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MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'

November 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Khaleda Hussain	SECAS
Kev Duddy	SECAS
Mike Fenn	SECAS
Joey Manners	SECAS
Anik Abdullah	SECAS
Andrew Firth	AltHANCo
David Jones	AltHANCo
David Walsh	DCC
Robin Seaby	DCC
Easton Brown	DCC
Sarah-Jane Russell	British Gas
Julie Geary	E.ON
Alex Hurcombe	EDF Energy
Daniel Davis	ESG Global
Terry Jefferson	EUA
Alastair Cobb	Landis + Gyr
Ralph Baxter	Octopus Energy
Michael Walls	Ofgem
James Doyle	Outfox the Market
Emslie Law	Ovo Energy
Mafs Rahman	Scottish Power
Eric Taylor	SLS Corp
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Robert Johnstone	Utilita
Gemma Slaney	WPD
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified and the proposed next steps.

Issue

- Consumers have the right to refuse a smart meter.
- Suppliers have a Licence Obligation to install smart meters and further Smart Energy Code (SEC) Obligations to ensure they are communicating with the Data Communications Company (DCC).

Working Group Discussion

SECAS (AB) described the issue whereby consumers could refuse a smart meter, but Suppliers have a Licence obligation to install smart meters specifically where meters need replacing and when a new meter is installed for example in a new build.

All Reasonable Steps

SECAS highlighted that the Licence requirement is to undertake 'All Reasonable Steps' (ARS) to install a smart meter. This would include attempting to contact the consumer and the Department of Business, Energy and Industrial Strategy (BEIS)/Ofgem would decide if this complied with the ARS.

The Ofgem representative (MW) confirmed that currently Suppliers are required to report these figures to Ofgem who determine if the steps taken comply with ARS.

SECAS (AB) highlighted that there was an opt in/opt out DCC User Interface Specifications (DUIS) command but there was no functionality behind this and therefore it would require significant DCC System changes to implement. It was also highlighted by the Ofgem Representative that this would undermine the Licence requirement.

One member of the Working Group said this should continue to be considered until a better solution is identified.

The Ofgem representative (MW) said that it would not be appropriate to try to codify those exceptional circumstances where a smart meter was not wanted. He requested that the modification be Authority Determined to allow Ofgem to ensure that all legal and Licence requirements were being treated as paramount and not being undermined.

It was highlighted that some consumer websites were suggesting that consumers could have smart meters installed in 'dumb' mode however the Proposer highlighted that there was no 'standard' for this, and they weren't sure what was required in these situations as the Licence and SEC requirements remain.

The Ofgem representative re-iterated that the Licence required Suppliers to install smart meters and that these operate in smart mode and ARS should be used to ensure this was taking place. Any codification of 'exceptions' would undermine Ofgem's ability to determine whether ARS was being complied with.

One Working Group member (ET) asked what might be acceptable if a smart meter was installed but not commissioned so as not to have out of date information being provided.

The Working Group questioned what this might look like operationally – is it a standard smart meter, with no ZigBee noise. The member questioned why Ofgem could not be clear on the requirements. They suggested an aeroplane mode might be an option.

The Ofgem representative replied saying that they want the Suppliers to make every attempt to install a communicating smart meter and it is up to the Supplier to determine what they think that should be. This is then discussed in bilateral Ofgem/Supplier meetings around Supplier rollout reports which are provided to Ofgem.

The Consumer Representative stated that they had checked their website and considered that the description was sufficiently vague to not mis-lead consumers but to encourage them to talk to their Supplier.

One Working Group member highlighted that they had received guidance from the Ombudsman to install a smart meter that was not communicating at the consumers request. They asked how this can be reconciled with Ofgem stating that there should not be any guidance on how to leave meters in a non-communicating state.

A Working Group member who is a Meter Asset Provider (MAP) said they were keen to find a solution as many meters appeared to be left in an installed and not commissioned state. They would like some way to identify these where there is a specific reason for leaving the meters in this state.

Heritage meters

Heritage meters were discussed. The proposer had highlighted that these were no longer in large scale production and therefore becoming scarce. In addition, the economics of producing them had increased and they were more expensive. Another Working Group member highlighted that traditional (heritage) meters were not able to provide information about repatriated microgeneration. It was also mentioned that the cost to serve would increase as meters became more expensive, the benefits to the network would not be realised and the next tenant would not be able to take advantage of smart tariffs until a new smart meter had been installed.

Radio-Teleswitched (RTS) sites

This has been identified by the Proposer as an issue where RTS sites have no access to the Wide Area Network (WAN). The Working Group agreed that this is an issue.

Meter Reads and Change of Mode

It was highlighted that where smart functionality is not available meters need to be read manually. Also any requirement to change the meter mode from Credit to Prepayment cannot be done remotely and will need a site visit. This will also increase the cost to serve. One Working Group member (SJR) asked who would pay for those costs, would they be expected to be covered across all consumers or only those who refuse a smart meter?

Current Smart Metering Inventory (SMI) data issues

A Working Group member (GS) stated that there are currently thousands of commissioned ESMEs in the SMI, but they are not with commissioned Communications Hubs therefore there are no communications with those Devices. She questioned if this was deliberate or a problem with the SMI and that it would be helpful to know.

The Proposer said the aim was to install a smart meter but allay consumer fears, not break the smart metering system, and identify where there are issues that may be resolved in the future. This would allow better education pieces and conversations with consumers, more accurate and informative industry data and knowing what the issue is when the next consumer moves in.

It was suggested that there could be an industry flag for consumer preferences rather than the state of the meter.

Next Steps

The following actions were recorded from the meeting:

- SECAS to table this for further discussion at the next working Group meeting.