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MP169 ‘Managing SEC Obligations and the Consumer's Right to Refuse a Smart Meter’

February 2022 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Elizabeth Woods	SECAS
Kev Duddy	SECAS
Mike Fenn	SECAS
Joey Manners	SECAS
Tim Newton	SECAS
David Walsh	DCC
Easton Brown	DCC
Emma Johnson	British Gas
Lynne Hargrave	Calvin Capital
Alex Hurcombe	EDF Energy
Daniel Davies	ESG Global
Carrie Coles	Good Energy
Peter Hoare	Kaifa Metering
Ralph Baxter	Octopus Energy
Michael Walls	Ofgem
Audrey Smith-Keary	OVO Energy
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Christie Thomson	SSE
Robert Johnstone	Utilita
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the modification, the draft business requirements, and proposed next steps.

Overview

Suppliers have a license obligation to take all reasonable steps to install a Smart meter and to ensure the Smart meter is communicating via the DCC System. However, consumers have a right to refuse the installation of a Smart meter.

Information on the Citizens Advice website states that Suppliers may be able to install Smart meters in a 'dumb' mode, with Smart functionality disabled. While this is technically true, it cannot be achieved without contravening best practice and causing numerous technical issues. The Proposer's concern is that this advice has a negative impact on Suppliers' customer relations, as they could be seen to not be doing everything in their power to comply with consumer choice.

Proposed Solution

SECAS (MF) provided an overview of the discussions that have previously taken place on this modification, and summarised three types of solution:

- a change to the Citizens Advice guidance;
- fully defining and codifying Ofgem's 'All Reasonable Steps (ARS)'; and
- a technical solution to allow consumers a degree of choice in the Smart functionality of their meter.

SECAS advised that it is investigating a technical solution following discussions with the Proposer. SECAS noted that representatives from the Department for Business, Energy and Industrial Strategy (BEIS) and the Authority (Ofgem) have previously expressed concern that allowing a consumer to 'opt out' of DCC Services could undermine the Supplier's licence obligations. However, SECAS's view is that the Proposed Solution is worth exploring to draw out the technical implications and potential costs with the aim of reaching a valid compromise.

Business requirements

SECAS (MF) presented the following draft business requirements:

- 1) Suppliers will be able to send Service Reference Variants (SRVs) to notify the DCC of the customer's preference for Smart functionality.
- 2) Smart meters will have a flag indicating if they are non-communicating due to customer choice.
- 3) Critical, Security and Safety Alerts will still be sent when a Smart meter has been 'opted out' of DCC Services.

Requirements Workshop discussion

SECAS (MF) noted points raised at January's Requirements Workshop meeting:

- SRVs to 'opt in' or 'opt out' of the DCC Service ((SRVs 8.5 and 8.6) are present in the DCC User Interface Specification (DUIS) but are not currently allocated to any User Roles and therefore cannot be used. Despite not being allocated to Users, SRVs 8.5 and 8.6 have a designated purpose which doesn't fit these business requirements. However, the DCC

acknowledged there could be cost benefits to repurposing the existing SRVs rather than creating new ones.

- If the solution is for the DCC to prevent Suppliers from sending and receiving certain messages to/from 'opted out' Smart meters, then it could make sense for the 'flag' to cause relevant Service Requests (SRs) to be rejected.

Working Group Discussion

A Working Group member queried what the aim of the modification was. SECAS (MF) noted that at present the modification is concerned with exploring all solution options to determine what is possible, practical, and can both improve consumer experience and provide benefits to industry.

A Working Group member (AH) queried the business case, expressing the belief that the Proposed Solution will only affect a small subsection of consumers. SECAS (MF) noted this concern and advised that it would be considered in the development of a valid business case.

A Working Group member (EH) expressed concern that any solution which involved reductions in Smart functionality would require quite fundamental changes to Smart Metering Technical Specifications (SMETS). SECAS (MF) noted this concern and agreed this would be considered in technical discussions on solution development.

Two Working Group members expressed support for the modification. One (CC) noted the potential for giving consumers more control over the use of their data. The other (LH) specifically noted the benefits of Business Requirement 2, as there is currently no database view of premises which have refused a Smart meter, therefore increasing the number of negative customer interactions.

An Ofgem representative (MW) clarified that unless the solution could be designed in such a way so as not to undercut the Supplier licence obligations, then Ofgem would not approve its implementation.

Next Steps

The following actions were recorded from the meeting:

- SECAS to further develop the solution with the Proposer and relevant sub-committees.
- SECAS to work with the Proposer and Citizens Advice to draft amendments to the consumer guidance and present to Ofgem.