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Dear Neil,

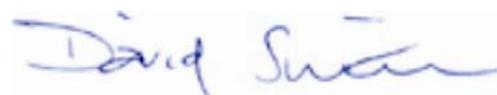
**SMART METERING IMPLEMENTATION PROGRAMME – ROLL OUT  
INFORMATION REQUEST**

Energy Networks Association (ENA) is the industry body representing the UK's electricity and gas transmission and distribution network companies. The following comments are provided by ENA on behalf of its members in response to the 'Smart Metering Implementation Programme – Roll Out Information Request'. These comments are submitted in addition to and in support of individual responses which may have been sent to you from ENA member companies.

In responding to this consultation ENA has taken into account that this information request is targeted specifically at Suppliers, Meter Operators and Meter Manufacturers. ENA would however like to take the opportunity through this process to raise a number of issues which are relevant to the smart metering roll out programme and which ENA believe need to be taken into account.

This response may raise issues which you will want to discuss in further detail, if so please contact Paul Smith at the ENA on by phoning 0207 706 5156 or emailing [paul.smith@energynetworks.org](mailto:paul.smith@energynetworks.org).

Yours sincerely



David Smith  
CEO Energy Networks Association

**Smart Metering Implementation Programme – Roll Out Information Request**  
**Response from the Energy Networks Association**

This consultation raises many issues including the potential for the acceleration of the smart metering roll out programme to achieve between 60% and 90% completion within 4 years.

ENA recognise the value from early realisation of smart metering benefits but would like to take this opportunity to highlight a number of points which may be helpful in your considerations as well as underlining the issues which will directly impact on our Member Companies.

The following points outline the issues ENA would like to highlight for further debate and consideration:

1. ENA believe that the deployment programme should be seen as an opportunity to improve the quality and safety of the electricity and gas service position in consumer's premises. This should not slow the delivery programme down and in fact with a coordinated approach of relevant organisations this should improve the efficiency of the gas and electricity smart metering installations.
2. Whatever the speed of the deployment ENA Member Companies will need to support Suppliers and their agents in correcting any current and latent network issues as they emerge. This could range from a short duration job to correct a simple issue to a more complex and therefore longer duration task such as a replacement of a gas or electricity service service, asbestos meter boards etc.
3. At a minimum specified roll out of 60% installation of smart meters within 4 years, ENA believe this will present significant resourcing challenges for ENA member companies in supporting installers in correcting current and legacy issues. These issues will generally become apparent during the first visit by the installer.
4. Any increase beyond 60% would place member companies in a more difficult position with regard to resourcing. The majority of member company personnel that would need to be available to correct these issues are existing highly trained people who are already currently directly employed or who work for associated industry contractors.
5. ENA estimate that this will be a significant additional burden on network businesses which has not been considered during the current gas and electricity distribution Price Reviews as it represents a body of work that would not have been previously necessary within such a compressed time period.

6. For the roll out programme to run smoothly it will require a coordinated approach to this work and available resources from ENA Member Companies to ensure that the customer has a positive experience from the smart metering installation.
7. ENA are currently working with Energy and Utility Skills/ National Skills Academy for Power, Suppliers, Association of Meter Operators, Meter Operators and the Health and Safety Executive in order to ensure that the issues and procedures are documented and that training and re-training of meter installers take into account the service position issues and how to deal with them.
8. An accelerated installation programme and productivity incentives may increase the likelihood of procedures not being completely followed at all properties. This risk has been identified by the ENA Smart Metering Operational Group - and through MOCOPA and MAMCOP will provide the governance arrangements associated with procedural compliance.
9. The early deployment by British Gas from October this year will assist by informing our understanding of the volume of properties where networks related remedial works is required.

ENA would welcome further and more detailed discussion on these topics and look forward to continuing this dialogue which ENA believe will contribute significantly towards a successful deployment of smart metering within Great Britain.