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**SMART METERING IMPLEMENTATION PROGRAMME**  
**Consultation on maximising interoperability for SMETS1 meters, including draft legal text**

**FINAL response from the Energy Saving Trust**

**23rd May 2018**

**Q1. Do you agree with the proposal that suppliers should be required to take all reasonable steps to enrol eligible SMETS1 meters in the DCC, or replace with SMETS2, within a specified timeframe?**

Yes, we agree with the proposal that suppliers should be required to take all reasonable steps to enrol eligible SMETS1 meters in the DCC, or replace with SMETS2, within a specified timeframe.

As noted in the consultation document, consumers who do not have enrolled smart meters will not have the same opportunities to benefit from third party services as those whose meters are enrolled in the DCC. Later this year, the Energy Saving Trust, on behalf of the Scottish Government, will launch a third party service (SMAP) which will use an individual's smart meter data (with that individual's consent) to enhance the impartial advice it delivers to householders through Home Energy Scotland. Each year Home Energy Scotland helps more than 90,000 households and the integration of smart meter data into the advice it provides will enable the provision of a more tailored, personalised and effective service. Given both the UK Government's and Scottish Government's climate change and fuel poverty targets and the well-recognised role that impartial advice can play in changing the way householders' use energy, it will be important that as many households as possible are able to benefit from this service. If this is to happen it will be essential that that eligible SMETS1 meters are enrolled in the DCC or, where this is not possible, suppliers move rapidly to replace these meters with SMETS2 meters.



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**Q2. Do you agree with the proposal that suppliers should have six months from the point at which a SMETS1 meter can be enrolled to either enrol it or replace with a SMETS2 meter? Please provide evidence for any differing views on widow length.**

Yes, we agree with the proposal that suppliers should have six months from the point at which a SMETS1 meter can be enrolled to either enrol it or replace it with a SMETS2 meter.

**Q3. Do you agree with the proposal that where a supplier gains a SMETS1 meter that can be enrolled but is unenrolled, it should either enrol it or replace with a SMETS2 meter within six months of the point at which it gains the meter?**

Yes, we agree with the proposal that where a supplier gains a SMETS1 meter that can be enrolled but is unenrolled, it should either enrol it or replace with a SMETS2 meter within six months of the point at which it gains the meter.

**Q4. Do you agree with our current expectation that energy suppliers would consider enrolment of eligible SMETS1 meters to be more desirable than replacing them with SMETS2? If you do not share this view, please provide evidence to support your response.**

No response.

**Q5. Do you agree with the proposal that any unenrolled SMETS1 meters should be replaced with SMETS2 meters by the end of 2020?**

Yes, we agree with the proposal that any unenrolled SMETS1 meters should be replaced with SMETS2 meters by the end of 2020. As noted above both the UK Government's and Scottish Government's climate change and fuel poverty targets mean that it is important that as many households as possible are able to benefit from smart meter data informed energy saving advice. It is also important that they do not have to wait beyond 2020 to benefit from this.

**Q6. Do you agree with the proposal that once a SMETS1 meter has been enrolled in the DCC it should not be possible for a supplier to withdraw it and operate it outside of the DCC?**

Yes, we agree with the proposal that once a SMETS1 meter has been enrolled in the DCC it should not be possible for a supplier to withdraw it and operate it outside of the DCC. This is because operating it outside of the DCC will mean that the associated householder will not be able to benefit from third party services.

**Q7. Do you have any comments on the government's views regarding the likely challenges of delivering the alternative option (Option 2) in a timely manner on a market-wide basis?**

No, we do not have any comments on the government's views regarding the likely challenges of delivering the alternative option (Option 2) in a timely manner on a market-wide basis.

If you have any questions about this response or would like any additional information please do not hesitate to contact Elaine Waterson ([Elaine.watson@est.org.uk](mailto:Elaine.watson@est.org.uk), 0131 555 7912)