



**Gaslink Response to Public Consultation CER10082: Consultation on Possible National Rollout Scenarios for the Smart Metering Cost Benefit Analysis**

30 July 2010

## **1. Introduction**

Gaslink welcome the CER's decision to consult with industry participants and other stakeholders on their Public Consultation Paper on Possible National Rollout Scenarios for the Smart Metering Cost Benefit Analysis and the opportunity to respond.

Bord Gáis Networks, in accordance with the Operating Agreement approved by the CER, has provided the CER with detailed feedback in response to this consultation paper, of which Gaslink is supportive. Gaslink therefore will only focus on a limited number of items at a high level in its response below.

## **2. Response**

Gaslink believes there are substantial benefits in implementing the Smart Metering Programme for both domestic and I/C gas customers. Considering the average domestic user's gas (kWh) consumption is approximately three times than that of electricity, it could be argued there are greater opportunities for energy unit savings with gas use than electricity in certain circumstances. In providing the dual fuel customer with a more vivid and immediate understanding of the cost differences between gas and electricity it could encourage the use of gas where there is an option of using either fuel for the same function to reduce their bills (e.g. heating water).

Gaslink recognises that there are advantages to be gained by considering the full suite of utilities and other functions that may benefit by the implementation of a sufficiently flexible communications infrastructure (e.g. water metering and demand management) and that the programme scope should provide for their inclusion.

Gaslink also suggests consideration should be given to the inclusion of remote meter locking functionality, with adequately robust, safe and secure technology. Cost savings could be gained by having the functionality to lock meters remotely where access to the meter is not provided.

Gaslink supports the CER's focus on data privacy issues and the requirement of robust safeguards to ensure privacy and the determination of how issues are governed.

Further consideration should also be given to whether or not there will be an opt-in / opt-out basis for different uses. For example, an end user may wish to have a Smart Meter installed but not the In-Home Display.

Under the 3<sup>rd</sup> Energy Directive consumers must be properly informed of actual energy consumption and costs frequently enough to enable them to regulate their own consumption. The EU Commission considers the receipt of this information on a monthly basis sufficient to allow a consumer to do this. Implementation of the Smart Metering Programme would allow Ireland to be progressive in meeting this requirement.

Finally, it needs to be considered that the implementation of a Smart Metering Programme will require changes to the Gas Network Code of Operation, Bord Gáis Network's Meter Data Services Procedures and service provider contracts. Further consultation may be useful to address these items.