



CONSULTATION ON THE SCOPE OF CONTROLLED ELECTRICAL  
WORKS IN RELATION TO LIFESTYLE CHOICE PREPAYMENT  
METERS

SSE AIRTRICITY RESPONSE TO  
THE COMMISSION FOR ENERGY REGULATION

2015

## INTRODUCTION

SSE Airtricity welcomes the opportunity to comment on the CER's paper "Consultation on the Scope of Controlled Electrical Works in relation to lifestyle choice prepayment meters

SSE Airtricity is the largest independent supplier operating in Ireland with over 800,000 customers served across both electricity and natural gas markets. SSE Airtricity is committed to the development of competition in energy markets in Ireland and to presenting its customers with quality customer services and choice such as lifestyle prepayment options. We continue to be supportive of measures that provide for an effective and safe installation of lifestyle meters that directly delivers benefits to our customers, both in terms of the customer experience and safe optimised energy usage.

## COMMENTS

SSE Airtricity would be unsupportive of CER's proposals on expanding the definition of the scope of Controlled Electrical Works so that the installation and/or removal of lifestyle choice prepayment meters fall within the scope of Controlled Electrical Works. Whilst we are generally supportive of any measures that provide for the installation of these devices to be conducted in a safe and secure manner, we do not believe that the proposals are appropriate to this particular scenario.

We understand that the installation of these meters would not alter anything on the distribution board itself and would only interrupt the main ESB feed. Therefore this would not create any additional safety concerns onto the distribution board. When installing these downstream lifestyle meters the biggest risk that can occur is "Reverse polarity". This can be hazardous if the "live" side of your electrical system gets connected to certain types of equipment and could cause the earth to become live if they were wired incorrectly.

SSE Airtricity believes that a more appropriate solution should be devised to address these issues. In this respect we would suggest that the concerns around reverse polarity could be better resolved using an appropriate testing device. Currently an agreement exists among all lifestyle meter suppliers to conduct this test both before and after installing the meter. Since this is still an informal arrangement among suppliers we would propose that the CER considers implementing this into a formal written agreement in its decision. For instance this process could be inscribed into the standards and requirements through the RECI/ECSSA and monitored effectively in order to establish compliance.

Furthermore SSE Airtricity would be of the opinion that expanding the definition of the scope of Controlled Electrical Works would add an extra unnecessary cost burden on the supplier. Ultimately these costs will feed back into the tariff rate which will greatly increase costs for all customers. In many cases customers availing of these meters are already having difficulty managing the cost of electricity and are potentially in hardship. Therefore we believe that careful consideration needs to be taken when making these changes.