

Smart Metering Implementation Programme  
Policy and Governance Team  
Department for Business, Energy and Industrial Strategy  
2nd Floor  
1, Victoria Street  
London, SW1H 0ET

08 November 2019

To whom it may concern,

**Consultation Title:** Delivering a Smart System: Consultation for a Smart Meter Policy Framework post 2020

Scottish Renewables is the voice of Scotland's renewable energy industry, working to grow the sector and sustain its position at the forefront of the global clean energy transition. We represent around 260 organisations across the full range of renewable energy technologies in Scotland and around the world, ranging from energy suppliers, operators and manufacturers to small developers, installers and community groups, as well as companies throughout the supply chain.

**Completing the smart meter rollout is an essential part of the transition to a smarter, more flexible energy system.** We welcome the clarity that the post-2020 rollout proposals will give to the industry and consumers.

Richer energy data from households and businesses, together with innovative new tariffs and home storage technologies, could help to maximise usage of Scotland's renewable resources.

However, we would make the following points in relation to the rollout and its interaction with the uptake in renewable technologies.

1. Households seeking payments under the new Smart Export Guarantee (SEG) are required to have a smart meter (or other export meter capable of half-hourly measurement) installed.

In our response to the SEG consultation, we expressed concern that the design of the new mechanism will be an insufficient incentive to drive new small-scale renewable installations, and anecdotal evidence also suggests that, unless resolved, ongoing technical problems around solar PV and smart meter installations will compound this, affecting both the uptake of smart meters and new installations of small-scale renewables.

**We urge BEIS to publish definitive guidance on smart meters and microgeneration.**

2. To ensure that Scotland's smart energy system is not held back, greater consideration needs to be given to how to speed up the rollout in Scotland's rural, and especially Highland & Island, communities.

These have seen a relatively low number of installations to date even though many of the most innovative local energy system projects (e.g. ReFLEX on Orkney) are in remote areas where smarter grid infrastructure (of which metering is an important part) could help with renewable constraints, as well as being a useful tool for tackling very high fuel poverty rates.

**To date, BEIS has not published any breakdown or regional statistics on the rollout, but we would like to see figures that reflect progress across Scotland in the annual milestones from 2021.**

3. Time-of-use tariffs have particular potential to address some of the challenges faced by constrained renewable generation, both at a local and national level.

Several Scottish projects have already trialled the use of local tariffs/billing linked to renewable supply (Shetland - NINES, Mull - ACCESS, Smart Fintry). Smart metering and half-hourly settlement are at the heart of bringing this to the wider consumer market.

In the context of the Scottish Government's ambitions on electric vehicles, smart charging also has an essential role to play in overcoming local network challenges.


**When developing policy and communications around smart time-of-use tariffs, we urge BEIS to consider how to maximise tariffs as a tool for supporting decarbonisation and smarter energy network.**

4. Access to smart meter data will be an important building block for new services and products in a smarter, greener energy system. While recognising that security and privacy are fundamental to the Data Communications Company (DCC) system, we've received feedback that interacting with the requirements of the DCC is seen as unduly onerous for potential users.

**We would urge BEIS to ensure that the DCC takes account of user feedback, so that smart meter data is made available efficiently to support innovative uses, and enables maximum benefits to consumers.**

Scottish Renewables would be keen to engage further with this agenda and would be happy to discuss our response in more detail.

Yours sincerely,



Ben Miller  
**Senior Policy Manager | Scottish Renewables**