



## **ACS Submission – Smart Metering Implementation Programme**

ACS (the Association of Convenience Stores) welcomes the opportunity to respond to the Department for Business, Energy and Industrial Strategy's consultation on the Smart Metering Implementation Programme. ACS is a trade association representing 33,500 convenience stores across the UK. Our members include One Stop, Spar UK, Costcutter and thousands of independent retailers.

The nature of convenience retail, with long operating hours, intrinsic use of refrigeration and other equipment, means that energy costs are a significant burden. The costs of energy are a critical factor in the viability of a convenience store business, and it is therefore crucial that convenience retailers receive accurate bills that smart meters provide.

We welcome the Department for Business, Energy and Industrial Strategy's proposals to increase engagement with microbusinesses to build their awareness and understanding of the use of smart meters. ACS' Voice of Local Shops survey of 1,210 independent convenience retailers in 2018, found that 29% of independent convenience retailers already had a smart meter installed in their business, 34% were aware of the government's smart meter roll out, and 32% were not aware that a smart meter was going to be installed in their business by 2020. Therefore, we welcome plans to extend Smart Energy GB's remit to apply to both domestic and microbusiness consumers equally.

Please see below for ACS' responses to the relevant questions in the consultation.

### **A.1 What do you think should be done about the low levels of microbusiness awareness of smart metering?**

We believe that the Department for Business, Energy and Industrial Strategy should introduce new obligations for Smart Energy GB to target microbusinesses. We agree that Smart Energy GB's objectives should be to build microbusinesses' confidence in the installation of smart meters, build microbusinesses' awareness and understanding of the use of smart meters, and increase the willingness of microbusinesses to use smart meters to change their behaviour.

To fulfil Smart Energy GB's first objective to build microbusiness' confidence in the installation of smart meters, we believe that it is important that communications to microbusinesses should address potential obstacles to installation. We believe a potential obstacle to microbusinesses adopting smart meters is the perception of the length of time it takes to install a smart meter. Convenience retailers are heavily reliant on refrigeration and other equipment and are consequently apprehensive about installation as it will result in downtime and in turn profit losses. We encourage Smart Energy GB to highlight the length of time it takes to install a smart meter to minimise perception that there it will result in a long period of down time as part of their communications to microbusinesses. Moreover, Smart

Energy GB's communications to microbusinesses should also clarify whether the installation of a smart meter changes an existing contract as perception amongst businesses is that it does, which could prevent uptake of smart meters.

When developing the communication programme to microbusinesses, we believe that Smart Energy GB should also consider the role of trade associations, including ACS, to disseminate communication materials to microbusinesses. Trade associations provide direct communication channels with microbusiness. Smart Energy GB should also consider utilising trade press of relevant business sectors to communicate directly to microbusinesses.

**A.2 Do you agree that targeting microbusinesses (as opposed to a wider range of nondomestic consumers) is the appropriate approach?**

Yes. Microbusinesses will have no greater resource or understanding of energy markets than domestic customers. Therefore, we believe it would be extremely valuable to focus on building microbusinesses' awareness and understanding of the use of smart meters.

**B.1 Do you agree that providing non-domestic consumers with free access to their energy consumption data would improve non-domestic consumers' engagement with their energy use?**

Yes. Ensuring that there are no barriers, such as fees, for non-domestic customers to access their energy consumption data is an appropriate step to help improve non-domestic customers' engagement with their energy use.

**B.2 What views do you have on the supplier-to-consumer energy consumption data offer? Do you see the need to set a common standard for the provision of information to encourage non-domestic consumers to engage in energy management, and if so, what data should it include, and what format should it be delivered in?**

The information provided to non-domestic customers should be clear and easy to understand. Energy suppliers could provide materials to non-domestic customers to help them understand how to interpret their energy consumption data which in turn could help increase engagement.

**B.3 If changes are made to data offer, which consumers should this apply to?**

Microbusinesses only, either with smart or advanced meters.

**B.4 Do you agree with the proposal to amend licence conditions to allow energy suppliers to access daily consumption data in circumstances where the supplier suspects theft, and for accurate billing purposes, including addressing consumer queries?**

We believe that the licence conditions should be consistent with the existing licence conditions for domestic premises, however, microbusinesses should still have the power to opt out if they wish.

**For more information on this submission, please contact Julie Byers, ACS Public Affairs Manager by emailing [Julie.Byers@acs.org.uk](mailto:Julie.Byers@acs.org.uk) or calling 01252 515001.**