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Excellency,

It has come to my attention that currently the implementation of various EU-directives on energy efficiency are being discussed in the Dutch Senate. During the parliamentary debate, focussing amongst others on smart metering, I understand that my organisation, BEUC, was mentioned. As you may be aware BEUC is the European umbrella organisation for consumer organisations: We currently represent 42 independent consumer organisations from 31 European countries. Consumentenbond in the Netherlands has been a founding member, participates in our General Assembly and sits on the Executive Board.

In the debate in the Senate, it has been reported to me that you would have stated that BEUC would favour a mandatory roll-out of smart meters. This statement must be based on wrong assumptions, because we are just now finalising a specific position on smart metering and have not communicated on it yet.

As you might well know, on the European level, questions surrounding the roll-out of smart meters have come to the foreground with the review of the internal electricity and gas directives. The European Commission had suggested that consumers *"...shall be properly informed every month of their actual electricity/gas consumption and costs. No additional costs can be charged to the consumer for this service."*¹

¹ COM(2007)0528

BEUC did support the right for consumers to be provided with actual consumption data, but did not comment on the technology to be used. We were nevertheless aware that the implementation of this right could entail a significant adaptation of the metering technology: *"In order to inform consumers, the metering equipment will have to be changed in most Member States, leading towards the installation of so-called "smart meters" which "communicate" actual consumption to the supplier and inform the consumer about the cost of the actual consumption. Consumer organizations and regulators should therefore discuss the roll-out of smart metering technology to ensure that consumers' interest in terms of clearness of the information provided, easiness to handle these systems, etc. is taken into account. Only if price increases of energy following environmental measures are fully understood by consumers could they bring about the desired efficiency increases in which they intend to result in."* (BEUC X/067/2007)

BEUC is fully aware of the potential of smart metering and the digitalisation of the electricity and gas market. It could lead to better informed and empowered consumers if feedback to consumers is ensured. Smart meters could be widely accepted if the privacy issue is well addressed, i.e. complying with EU and national privacy laws. BEUC is aware that smart meters could be beneficial for vulnerable consumers if they are well protected against disconnection. The debate on smart metering is rich and stimulating, but equally very much linked to the specificities of every country. At this stage, BEUC considers that the issue of introduction of a generalised system of smart metering system should be left to the discussions at a national level.

We were surprised to hear that BEUC had been quoted as being in favour of a mandatory, pan-European introduction of a smart metering system at a European level. This is certainly not the case. Nor are we in favour of a mandatory roll-out at national level. We deplore such statements which, as the previous quotations show, are clearly based on misinformation.

My experts are of course at the disposal of your services for any further information and comment.

Yours sincerely,



Monique Goyens
Director-general BEUC

CC: drs. B.R. Combée, President of the Consumentenbond