



**Commission de Régulation de l'Energie**  
**Consultations Publiques**  
15, rue Pasquier  
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**Interlocuteur** : Manuel CABANILLAS

**Objet** : Consultation publique de la CRE sur le projet de déploiement d'un système de comptage évolué par GrDF

Paris, le 23 juin 2011

Madame, Monsieur,

Veuillez trouver la contribution de Gas Natural Europe en réponse à la consultation publique de la CRE sur le projet de déploiement d'un système de comptage évolué par GrDF.

Nous restons à votre disposition pour clarifier ou développer nos commentaires sur ce sujet. Nous ne tenons pas à ce que le contenu de cette contribution reste confidentiel.

Veuillez agréer, Madame, Monsieur, l'expression de nos sincères salutations.

Joaquin MENDILUCE VILLANUEVA  
Directeur Général  
Gas Natural Europe

**Question 1 :**

**Pensez-vous que les fonctionnalités de base proposées par GrDF sont satisfaisantes et de nature à améliorer le fonctionnement du marché du gaz ?**

Gas Natural Europe is in favor of the basic services proposed by GrDF, especially with the monthly publication of daily consumption for every customers and publication of real index for each contractual change.

GrDF should pay attention to the following point: IT required to have access to the data, frequency and format of publications should be the same for all shippers. Those publications should be easily handled by shippers thanks to its format and freely accessible.

Those basic services will avoid lack of information in the current system which multiplies estimations due to the bi-annual frequency of meter readings and will be beneficial for both the customers and the suppliers in the billing process. Billing on real index is a widespread demand among customers.

Gas Natural Europe is also in favor of the publications of this data on a website accessible both for suppliers and customers, as this is of utmost importance in order to reach some MDE gains.

In order to keep a “single point of contact” with the customer, this website should not make reference to GrDF, and have a “common name”, so that it can be mentioned on the invoices sent to customers without disturbing him.

**Question 2 :**

**Pensez-vous que les fonctionnalités complémentaires proposées par GrDF sont satisfaisantes et de nature à améliorer le fonctionnement du marché du gaz ?**

The provision of an output on the metering to plug an additional device for local reading should allow suppliers or other companies specialized in energy savings to provide new functionalities. It could therefore foster the gas market by giving a modern image of this energy. However, as it was seen during the pilot project conducted by GrDF, the small customers do not want to pay more for limited energy savings.

A possible choice for a fix date for meter reading will create more flexibility in supply contract and is compliant with the request of billing with real index.

Gas Natural recommends to develop another service: systematic warning of the supplier for consumption above a predefined level (by SMS and/or email) so that he can warn the consumer. This service should implicate the customer in the control of his consumption.

**Question 3 :**

**Etes-vous favorable à ce que la redondance spatiale des concentrateurs soit retenue dans le périmètre du projet proposé par GrDF ?**

As it was explained in the consultation, the spatial redundancy of hubs significantly increases the performance of the global system.

Gas Natural Europe believes that this AMR project has to be based on the reliability of the index. Therefore, any mean which can increase this reliability is most welcome.

However, the additional costs of 42 M€ represents an increase of 4 % of the total investment which is not negligible.

Thus, Gas Natural Europe would like that GrDF study other solutions, and particularly the one mentioned by CRE.

**Question 4 :**

**A niveau de qualité équivalent, seriez-vous disposés à accepter une mise à disposition des données plus tardive permettant ainsi de limiter le nombre de concentrateurs posés ?**

With a same level of quality, Gas Natural Europe prefers the less expensive solution. The proposition of the CRE seems to be in the right direction as a delay of few days in the publication of data is not really penalizing for a customer who has bi-annual index in the current system.

Moreover, for billing purposes and knowledge of consumptions behavior, monthly publication of daily data is sufficient. For energy services and gains in MDE, a daily access to those data is more important, but 2 or 3 days of delay in the data publication of 23% of all the point of consumptions (77% of stability – 93% of reliability in average) seems acceptable.

Therefore if the cost of adding “memory” to those metering devices is lower than the spatial redundancy, this could be a good solution.

A study of this solution has to be done in order to estimate the impact on the reliability rate of the daily index. Without this feedback, Gas Natural Europe is not able to decide which solution would be better.

**Question 5 :**

**Selon vous le déploiement systématique d’un afficheur déporté est-il opportun ?**

The cost study of the “remote display” done by GrDF shows an increase of the total investment (at least 65€/device for each customer).

Gas Natural Europe agrees with GrDF and is not in favor of a massive development of remote displays. Indeed, the only information which could be accessible will be the real consumed volumes without GCV and it will not help customers to understand their bills.

However, it could be proposed to customers as an additional payable service.

**Question 6 :**

**Êtes-vous favorable à ce que la mise en place systématique d’une vanne de coupure à distance ne soit pas retenue dans le périmètre de la solution ?**

Gas Natural Europe is clearly opposed to the installation of a remote shut-off valve. Our opinion is mainly based on the possible lack of security with this kind of device. In addition, the extra cost for this equipment is too important compared to the possible benefits (due to actual regulation a human intervention will in any case be needed).

However, the installation of a remote shut-off valve could be:

- Decided and financed on its own by the distribution company if it thinks it is more efficient to manage certain customers
- Optional and payable by a supplier if he wants for instance to provide a service of prepaid deliveries

**Question 7 :**

**Êtes vous favorable aux modalités de déploiement envisagées dans le scénario de référence (durée, volume etc.) ?**

The economic analysis of this project shows that the scheduled deployment of the devices will have a huge impact on its profitability. Gas Natural Europe is in favor of the first phase of deployment of 100.000 meters in 2014 because it will give to the market a large scale feedback and it will be possible to readjust parameters, especially number of failed interventions because we think the pilot project is not sufficient to estimate it.

That is why we would like to have a presentation of several scenarios with various parameters to estimate the impact on the global profitability.

By default, we estimate that a deployment over 10 years should generate less economic impact than over 6 years.

**Question 8:**

**Quel est votre point de vue sur les opportunités permises par le développement des systèmes de comptage évolué en gaz?**

Gas Natural Europe believes that the AMR project will improve the image of gas in France thanks to the development of modern devices. It will become a necessity with the Linky project in power that will change consumer’s behavior in the management of their energy consumptions.

It will also facilitate the change of supplier and above all the invoicing process.

**Question 9 :**

**Quel est votre point de vue concernant l'appréciation des gains de MDE liés à la mise en œuvre du système de comptage évolué proposé par GrDF ?**

Feedbacks on the energy savings due to smart meters does not exist. Therefore, all the data we have are only expected figures from theoretical studies in foreign countries.

The profitability of the AMR project depends a lot on the predictable energy savings, we recommend to take very conservative hypothesis to be sure of the final result.

We estimate that energy savings due to gas smart meters will be very small, and insignificant in comparison to the energy savings obtained thanks to electricity smart metering.

**Question 10 :**

**Selon vous, l'envoi plus fréquent qu'actuellement de données de consommation réelle est-il nécessaire pour réaliser des gains de MDE ? Si oui, pouvez-vous en préciser les modalités (fréquence, support, coût, acteur responsable, etc.) ?**

Gas Natural Europe agrees with the fact that a high frequency of consumption may increase the possible energy savings, but we do not think these energy savings will be really significant.

Moreover, we recommend a service of systematic warning of the consumer and / or supplier for consumption above a predefined level (by SMS and/or email).

The provision of daily consumptions for small customers will lead to energy savings as soon as a customer will be able to compare his consumption each day, but also with an historical and/or reference consumption of similar houses in his region. This information should also be given to him.

Nevertheless, these energy savings due to gas smart metering will be very small.

We estimate that much greater savings could be obtained through a public campaign promoting thermal insulation, and/or encouraging domestic customers to install an electronic programmable thermostat in their house.

**Question 11 :**

**Etes-vous favorable à la mise à disposition gratuite par GrDF des données de consommation réelle sur un site internet dédié et sur des supports adaptés aux personnes ne disposant pas d'un accès internet ?**

As it was told in question 1, Gas Natural Europe is in favor of the publications of this data on a website accessible for both suppliers and customers, as this is of utmost importance in order to reach some MDE gains.

In order to keep a "single point of contact" with the customer, this website should not make reference to GrDF, and have a "common name", so that it can be mentioned on the invoices sent to customers without disturbing him.

**Question 12 :**

**Que pensez-vous de la mise en oeuvre d'un mécanisme de régulation incitative spécifique au projet de comptage évolué de GrDF ?**

The CRE proposition of a regulatory incentive is supported by Gas Natural Europe. Indeed, any change in the scheduled program will modify the profitability on the whole project. The suppliers and the final consumers do not have to support any additional costs due to the drift on the management of the project as soon as the parameters are well defined with accurate feedbacks.

Moreover, as part of the reward of this project comes from gains of productivity (less Opex due to easiest and automated collection of measures, for example) a "RPI – x% price cap" regulatory framework should be envisaged.

**Question 13 :**

**Que pensez-vous de la proposition de couverture des coûts échoués en cas de non déploiement généralisé du projet de comptage évolué ?**

Gas Natural Europe is not opposed to the covering of sunk cost of the first phase in case the project would be stopped due to external reasons for GrDF. We stress that sunk cost and a failure of the project would make gas industry less attractive and that this point should be taken into account when the decision will be taken by the Ministry.

**Question 14 :**

**Que pensez-vous de la proposition de rémunération des immobilisations en cours de la phase de construction de la solution pour le projet de comptage évolué ?**

Gas Natural Europe is not opposed to the covering of the cost of the debt dedicated to this project, should this cost reflect standard market conditions for the financing of regulated assets.

**Question 15 :**

**Que pensez-vous de la demande de GrDF relative à la couverture par le futur tarif ATRD4 des coûts d'exploitation engagés par l'opérateur au titre du projet lors de la période tarifaire actuelle ?**

Gas Natural Europe is not opposed to the covering of those OPEX within the regulatory framework mentioned above.

**Question 16 :**

**Etes-vous favorable au lancement de la phase de construction de la solution du projet de comptage évolué de GrDF dans les conditions de régulation envisagées ?**

Gas Natural Europe is in favor of this project, but as mentioned above other solutions should be studied before and other information (and scenarios) should be required before giving our advice.

**Question 17:**

**Avez-vous toute autre remarque sur le projet de comptage évolué de GrDF ?**

Gas Natural Europe would like to know when this kind of project will be studied and deployed on other French DSO's system.

Concerning all the additional services that suppliers would be able to develop and propose to their customers by plugging an "energy box" on the smart meters, we consider fundamental to guarantee that exchanged data, communication protocols, IT developments, etc ... will be discussed in the framework of Consultation Groups, and will be defined on non-discriminatory, objective, and transparent basis.