

request-607100-fa566ad6@whatdotheyknow.com

.Your ref

Our ref

RJC/EIR 8001738753

Date

21 October 2019

Contact

Tel 0330 303 1271

Dear Mr Tsigarides

**The Environmental Information Regulations 2004  
Request for Information Reference 8001738753**

Thank you for your correspondence received on 3 October 2019 requesting an internal review of your initial request for information received on 25 September 2019 and which was responded to pursuant to the Environmental Information Regulations 2004 (EIR regulations 2004). Southern Water is not a public sector body covered by the Freedom of Information Act 2000.

I am the Head of Legal Services at Southern Water and can confirm that I had no involvement in your original request. In undertaking this review, I have reviewed your original request and have had regard to the EIR regulations themselves, guidance published by the Information Commissioners Office and Defra, and the correspondence between you and Southern Water.

In your original request you posed three questions regarding constant radiation which you understand is being sent from Southern Water's 'Smart Meters'. In the reply from Southern Water of 2 October 2019, it was explained to you that the meters that Southern Water use are not 'Smart Meters' as they do not contain the AMI technology required for two-way communication between the meter and the billing system, but contain AMR technology only, with ISO 4064 accreditation. Although Southern Water has explained to you why the meters in question are not 'Smart meters', in your request for an Internal Review, you pose five further questions about these 'Smart Meters', consequently, I must draw your attention to, and reiterate, the explanation that has already been given to you as to why the meters in question are not 'Smart Meters'.

We will deal with your request of 3 October 2019 under the EIR Regulations 2004. This letter provides the response to your request, as follows:

**1. Please kindly confirm the section of the Act and / or legislation that confirms, once your water smart meters are installed, they cannot be uninstalled.**

As previously explained, Southern Water does not install 'Smart meters' for customers in its water supply area. The meters installed by Southern Water are meters containing Automatic Meter Reading (AMR) technology with ISO 4064 accreditation.

Our Charges Scheme made pursuant to Section 143 of the Water Industry Act 1991 and approved by the Industry Regulator, Ofwat, provides that charges payable shall be and remain measured charges where a meter is installed on a water supply to a household premises.



Please also see the answer to Question 4 below,

**2. Please kindly confirm the Act and / or legislation that confirms, you have the authority to install these water smart meters without safety tests being carried out beforehand.**

Please see the answer to Question1 in relation to the installation of water meters by Southern Water.

As previously explained, Southern Water does not install 'Smart meters' for customers in its water supply area. The meters installed by Southern Water are meters containing Automatic Meter Reading (AMR) technology with ISO 4064 accreditation.

Southern Water uses ARAD Dialog3G Gladiator AMR water meters which have received ISO 4064 accreditation by the British Standards Institute. The meter also complies with required British Standards requirements for water meters, BS-EN 14154. All aspects of performance, including safety and reliability, were considered as part of the selection process.

**3. Please kindly explain how you can deem your water smart meters safe and not harmful to people, when no safety tests have been conducted.**

As previously explained, Southern Water does not install 'Smart meters' for customers in its water supply area. The meters installed by Southern Water are meters containing Automatic Meter Reading (AMR) technology with ISO 4064 accreditation.

The water meters installed by Southern Water are considered to be safe on the following basis. Southern Water uses ARAD Dialog3G Gladiator AMR water meters which have received ISO 4064 accreditation by the British Standards Institute. The meter also complies with required British Standards requirements for water meters, BS-EN 14154. All aspects of performance, including safety and reliability, were considered as part of the selection process

**4. Please kindly confirm the Act and /or legislation that states that the installation of water smart meters are mandatory.**

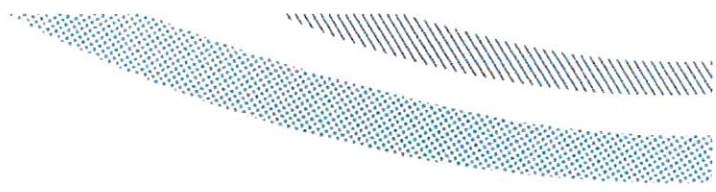
As previously explained, Southern Water does not install 'Smart meters' for customers in its water supply area. The meters installed by Southern Water are meters containing Automatic Meter Reading (AMR) technology with ISO 4064 accreditation.

Please also see the answer to Question1 above.

DEFRA, the Government department which is responsible for the water industry, has classed the Southern Water region as an area of serious water stress. Southern Water has a duty to protect its water supplies and to prevent leakage and wastage, and in fulfilment of that duty it created a Water Resource Management plan which promotes full metering in the region. The plan was approved by DEFRA, and Southern Waters' universal metering programme commenced in 2010.

The relevant legislation is The Water Industry (Prescribed Conditions) Regulations 1999 section 3(1) and the Water Industry (Prescribed Conditions) (Amendment) Regulations 2007 section 4(1). Both instruments enabled water companies to fix charges by reference to volume without a customers' consent in water stressed areas. Provided that Southern Water acts within the legal framework outlined above, customers cannot refuse the installation of a water meter under the universal metering programme.





**5. Please kindly confirm how many homes in your area are without your water smart meters, and why; especially as you have stated that these water smart meters are mandatory, and do not require our consent for their installations.**

As previously explained, Southern Water does not install 'Smart Meters' for customers in its water supply area. The meters installed by Southern Water are meters containing Automatic Meter Reading (AMR) technology with ISO 4064 accreditation.

There are a number of reasons why a property cannot have a water meter fitted. The overall number of properties without an AMR meter in the Southern Water region is 138,723 which are split into:


- 134,778 Assessed supplies
- 3,945 Unmetered supplies (charged on the rateable value of the property)

As a result of this Internal Review, I consider that Southern Water has provided you with the information that is held in relation to your request. If you are not content with the outcome of the Internal Review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office,  
Wycliffe House, Water Lane,  
Wilmslow, Cheshire, SK9 5AF.

You can find out more about how to do this, and about the EIR Regulations 2004 in general, on the Information Commissioner's website at: [www.ico.org.uk](http://www.ico.org.uk). Complaints to the Information Commissioner can be made via the "report a concern" section of the Information Commissioner's website.

Yours sincerely



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