

Smart Metering Implementation Programme  
Department of Energy and Climate Change  
Orchard 3, Lower Ground Floor  
1 Victoria Street  
London, SW1H 0ET

31 August 2015

**SMART ENERGY GB RESPONSE TO THE DECC CONSULTATION ON NEW SMART ENERGY CODE  
CONTENT AND RELATED SUPPLY LICENCE AMENDMENTS – JULY 2015**

**Smart Energy Consultation Responses**

We support the positions outlined in Questions 1, 2 and 21.

We provide no comment on the issues raised in questions: 3 - 20, and 22 - 33.

**Detailed Responses:**

1. **Question 1:** Do you agree with the legal drafting of the proposed amendment to the electricity and gas supply licence conditions?
  - a. Smart Energy GB fully supports the proposed principle and legal drafting behind this question. It has always been our position that the rollout of smart meters should be delivered by the creation of a market delivering communications within a single operational environment (the DCC), which provides the best and most cost effective method to maximise consumer benefits of smart meters. Therefore this proposed amendment to Licence Conditions seeking to require all licensees to take all reasonable steps to commission smart meters using DCC provided communications hubs into the DCC environment, and to ensure that no other arrangements are in place for communications is fully supported.
2. **Question 2:** Do you agree that this legal duty should take effect when DCC's enrolment service are first available?
  - a. It is the understanding of Smart Energy GB that where licensees are commissioning and enrolling DCC communications hubs and smart meters, they are configured such that they would not be compatible with their SMETS1 service provider systems. Therefore it is our belief that the legal duty should be applicable for all gas and electricity smart meter systems that provide communications via a DCC communications hub.
  - b. We would also recommend that the Communications Hub is defined in the proposed Electricity and Gas Licence Conditions. The legal text we would recommend is *'has the meaning given to it from time to time in the Smart Energy Code'*.



3. **Questions 3 - 20:** nil response.
4. **Question 21:** Do you agree with the proposals, and associated legal drafting (including the proposed changes to the CHIMSM at Annex D), which would permit Suppliers to re-use Communications Hubs that they have removed from consumer premises in certain circumstances?
- a. Smart Energy GB supports the principle that re-use of communications hubs in certain circumstances has the potential to minimise costs to the rollout, thus maximising the benefits case, and the on-going operational use of equipment.
  - b. Data security and the protection of personal data from access or scrutiny by any party without express customer consent is a fundamental principle that the Programme has promised to consumers throughout the development and deployment of smart meters. Recognising that the gas proxy holds personal data, held under consent from the consumer, we agree that it is an absolute requirement that this data must be deleted from the device prior to further re-use in another consumer premises, and therefore support this proposal.
5. **Question 22 - 33:** no response.

REDACTED REDACTED  
REDACTED REDACTED REDACTED REDACTED

Information provided in this response is not confidential