



SCOTTISHPOWER
The Energy People

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

18 February 2015

Dear Sir or Madam,

A Consultation on New Smart Energy Code Content January 2015.

Thank you for the opportunity to respond to the above consultation.

We are broadly supportive of the proposals set out in the document, and particularly welcome the Government's suggestion that the DCC be obliged to offer to provide Informal Testing services.

However, if Parties are to obtain real benefit from such a service, the DCC will need to enhance the capability of its pre-UIT environment. At the very least, these Informal Tests must be able to utilise a comprehensive set of Service Requests, rather than the subset currently being proposed, if they are to yield meaningful results.

Another area of concern is the approach proposed for managing any further revisions to test dates already set down in the SEC. As it stands, the proposal does not seem to allow for Parties to be consulted ahead of any relevant direction from the Secretary of State. This would be unsatisfactory, and could leave potential impacts undetected.

Our detailed responses to all of the questions may be found in the annex. Should you wish to discuss any aspect of this response please do not hesitate to contact

Yours faithfully, A

Annex

Notifying new commencement dates for SEC testing phases

Q1 Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing?

Please provide a rationale for your response.

Given that the SEC currently stipulates a start date for SIT that is no longer feasible, we agree there is little alternative but to substitute that date with one that is. We also agree that the Secretary of State should have the power to direct this change to the Code.

However, we are concerned that the proposals for the treatment of further revisions of test dates do not seem to allow for Parties to be consulted ahead of any relevant direction from the Secretary of State. Should the overall test window remain unchanged but the individual test phases be further allowed to overlap (as is already the case for SIT and IT), we could find that activities, such as regression testing, become polluted with unresolved issues.

While we recognise the benefit of more flexibility in this area, we also think the proposals could be misconstrued as suggestive that a laissez-faire approach will be adopted to any subsequent delays.

Informal Testing

Q2 Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views.

a) Whether you agree with the strength of the obligation on DCC to offer the service
b) Whether you agree that DCC can determine the detailed rules to apply to use of the service

a) Although we consider the DCC to have a natural incentive to offer such services initially (i.e. when it stands to learn as much from the tests as the other participants), we also think those incentives could weaken over time. We therefore welcome the Government's proposal to place a reasonable steps obligation on the DCC, which should help to reinforce the principle without creating too onerous a burden.

Nonetheless, with details now emerging of the likely limitations of the pre-UIT environment, we are growing concerned that the potential benefits of such Informal Testing might not be realised - especially if the test environment is not capable of comprehensively supporting all Service Requests, or of providing full SMKI functionality. Similarly, the GFI tool must be capable of providing the full complement of GBCS formatted messages if it is to be of any real value.

b) Given that the DCC is responsible for, and will look to protect, the formal testing schedule, it would seem appropriate that it should also be responsible for determining the rules for using the service.

Q3 Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction? Please provide a rationale for your views.

We agree that the SEC approach is sensible. However, we are slightly concerned that the definition of Testing Services, a phrase referred to throughout the sections designate, is given in H14.1, a section excluded from the direction.

DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

Q4 Do you agree with our proposals and legal text in relation to the DCCKI PMA Function? Please provide a rationale for your response.

Yes, these are in line with expectations.

Q5 Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State? Please provide a rationale for your response.

Yes; given that the operational SEC Modification processes are effectively switched off for the time being, it would seem necessary for some such alternative arrangements to be introduced.

Changes to when Communications Hubs can be ordered

Q6 Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?

We agree with the proposal, which brings more consistency to the approach.

Minor consequential change to electricity and gas supply licences

Q7 Do you agree with the consequential changes we are proposing to electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation?

We offer no objection to the change as proposed.

ScottishPower
February 2015