

Smart Metering Implementation Programme
Product Delivery Team DBEIS
3 Whitehall Place
London,
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Monday 17th October 2016
via Email to: smartmetering@beis.gov.uk

Dear Sirs,

In response to the open consultation with regards to the Smart Energy Code content and Electricity and Gas Supply Licence Conditions, please find our response. To assist, I have structured the letter against the questions posed within your request.

Question 1: Do you agree that the legal drafting implements reactive I&L policy as proposed? Please provide a rationale for your views.

We agree with the proposed amendment to the legal drafting of the reactive Install & Leave policy. We have come to this conclusion based on our assessment of the proposal and the unforeseen technical issues that may be apparent upon installation. This change allows practical arrangements to be made should the Wide Area Network (WAN) be unavailable at the time of installation.

Question 2: Do you agree with the proposed approach for the implementation of proactive I&L for new connections and replacement meters? Please provide a rationale for your views.

After considering the options presented within the consultation, whilst we agree that there will be instances where an install will be completed in the known absence of the WAN mandating that a second install visit is required will inevitably drive up costs. We would welcome practical flexibility, where the HAN has been established as part of the install, the In Home Display (IHD) can be dispatched via post once the WAN connection has been established. To fulfil the SMICoP requirements a video tutorial would be made available for customers to set up the IHD through our website. Should the need arise or where the customer isn't in a position to self-install we would of course return to the property. Our main concern is that the availability and stability of the WAN currently is not fully known, mandating a return visit on all would considerably increase costs and our carbon footprint – both which we want to avoid.

Question 3: Do you agree that the legal drafting implements proactive I&L policy as proposed? Please provide a rationale for your views.

We do agree in part and welcome legal drafting to support the scenario of the proactive install & leave, however given our previous response we would like to see that practicality is considered when drafting the text.



Question 4: Do you agree that the proposed legal drafting accurately reflects our policy intention on maintenance and replacement of smart metering systems? Please provide a rationale for your views.

Yes we agree that the proposal reflects the intention as laid out in terms of maintenance and replacement. There is a risk that if there is no governance around replacement components, a SMETS2 meter may become a hazardous and non-compliant system posing a danger to safety and the national DCC infrastructure.

Question 5: Do you agree with the legal drafting of the proposed amendment to the electricity supply licence condition 50 regarding change of suppliers? Please provide a rationale for your views.

In principle we agree with the proposed amendment, however we note that the Electricity data flow D0150 is entitled Non Half Hourly Meter technical details. We would therefore query, given SMART meters will be half hourly as to whether this is the correct data flow to be amended. Simplifying the change of supplier process is much welcomed as long as the governance of information exchange is protected. We would be interested as to whether this is being considered as part of the quicker switching programme?

Question 6: Do you agree with the proposal and associated legal drafting to introduce additional requirements to provide for appropriate testing when the Secretary of State proposes to introduce amendments to the SEC? Please provide a rationale for your views.

We support the proposals in terms of additional testing which would be required by the DCC following changes made by the Secretary of State. As an energy supplier we are unable to fully comment on the impact of this however we recognise the importance of thorough testing before implementation, and adequate timelines to enable testing to be completed.

Question 7: Do you agree with the proposal and associated legal drafting (amendments to Section D) to clarify when and how testing requirements should be considered, for SEC Modification Proposals? Please provide a rationale for your views.

As per our response to question 6, we support thorough testing being completed on all modifications which may impact consumers or the onward supply chain from the DCC.

Question 8: Do you agree with the proposal and associated legal drafting to provide enduring RDP Entry Process Tests? Please provide a rationale for your views.

As per our response to question 6, testing is of high importance in terms of the SMART metering infrastructure and data exchange. Given that MPAN & MPRN data has now become personal data under the General Data Protection Regulation it is imperative that any new RDP is tested for industry requirements and as part of 'privacy by design' requirements



Question 9: Do you think that is appropriate that new Electricity Distribution Licensee or Gas Transportation Licensee holders, who opt to use the services of an existing RDP (which has already successfully completed RDP Entry Process Tests) be permitted to use this testing service? Please provide a rationale for your views.

We would agree that new DNO's / GT's should be allowed to use existing testing infrastructure to ensure consistency of testing parameters used by others and to ensure the same high level of security & data governance is across all of the industry.

Question 10: Do you agree with the proposal and associated legal drafting to provide DCC with the ability to require a Testing Participant to remove its Devices from a DCC test laboratory, in accordance with the requirements set out in the ETAD? Please provide a rationale for your views.

The proposal to draft requirements in terms of devices being removed from the DCC testing lab seem appropriate until a full investigation has been concluded or the decision referred to the panel has been upheld.

Question 11: Do you agree with the proposal and associated legal drafting to clarify the requirements around Test Communications Hubs? Please provide a rationale for your views.

We agree, given there are proposed clauses to ensure the DCC have to publish the variant of test communication hub, with reasons for not being available and the provision of an appeals process to the panel and authority.

Question 12: Do you agree with the proposed changes and legal drafting in relation to Section N? Please provide any rationale.

We support enrolling SMETS 1 meters within the DCC as soon as possible and would cooperate with requests for information where they are appropriate.

Question 13: Do you agree that the legal drafting implements the changes to Ofgem's Significant Code Review powers contained in its Code Governance Review 3 Final Decision?

Yes, we agree given this proposal avoids any unnecessary duplication and effort to fulfil the same objective as managing in silo.

Question 14: Do you have any comments on the proposed changes to Section H and Section I?

Your consultation refers to the Data Protection Act 1989, we would question as to whether this consultation has been prepared considering the General Data Protection Regulations (EU-GDPR). The new data protection law expands the old in terms of data subjects and the requirement upon the data controller. We would therefore welcome clarification and a review of the proposal to ensure it is compliant against EU-GDPR and not the Data Protection Act (1989).



Question 15: Making certain transitional variations enduring

We agree that making the temporary variations enduring will support the future user entry requirements for the DCC. As a small supplier we have not yet completed this process and would therefore welcome guidance of the enduring variations which impact section G and section H3.22A of the SEC.

Question 16: Definition of Registration Data Provider Systems

We support the proposed change to the RDP systems, removing it as an 'in scope' item in terms of section G and the SMKI and DCCKI process.

Question 17: Do you agree with our proposals for how multiple Technical Specifications and GBCS should be managed within the Code and do you have any comments on the proposed changes to supply licence conditions, the DCC licence and the SEC in order to give effect to them?

We have no issue with this proposal or comments to provide in particular other than the supply licence, DCC licence & SEC must be aligned to ensure there is no conflict in policy.

Question 18: Do you agree with our proposed approach to facilitating multiple versions of DUIS (and associated versions of the Message Mapping Catalogue and Parse and Correlate software)?

We have no concern against multiple versions of DUIS provided that there is correlation between them to ensure there is no confusion against catalogues or software versions in circulation.

Question 19: Do you agree with the proposals to make the changes set out in the Minor Miscellaneous Changes chapter and do you agree with the associated legal drafting? Please provide a rationale for your view.

We support the minor changes listed as part of this consultation to policies and codes, ensuring there is an accurate reflection of the changing landscape in terms of the Smart Metering programme.

I trust that our response assists with your consultation upon the changes to the Smart Energy Code and supplier licence.
