



Response from E.ON; BEIS Smart Metering Implementation Programme Consultation on Smart Energy Code and Licence Amendments September 2016.

General Comments

We are comfortable with the majority of the proposals in this consultation.

Whilst there are still a number of outstanding questions with regards to the impacts from the proposed Install & Leave policy decision, e.g. obligations for parties on change of supplier, we believe the proposals are the right approach given the extremely compressed rollout timetable remaining.

We do not believe the changes proposed in section N will deliver the required intent. The contract for communication services may sit between the Smart Metering System Operator (SMSO) and the communication service provider. The supplier in this case is not a party to the contract, that it is being requested to provide the detail.

It therefore seems extremely unfair to penalise a supplier with the threat of non-enrolment of meter assets for not providing details of a contract to which they are not a party.

With regards to the proposals for versioning of technical specifications we agree with the majority, but suggest these could go further to ensure that clear unambiguous documentation is provided to all parties to ensure effective management of installations and firmware upgrades resulting from each release.

We propose that the Installation Validity Period should be set at 12 months as a minimum. A period of less than 12 months may result in potential additional costs, as there will not be enough time to manage complex processes for upgrading devices and applying Over the Air Firmware updates.



Answers to specific questions;

Install & Leave

***Q1. Do you agree that the legal drafting implements reactive I&L policy as proposed?
Please provide a rationale for your views.***

Yes.

Q2. 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.

This is a sensible approach that provides further opportunity for suppliers to install smart metering systems should they choose to do so. Customer expectations will however need careful management to ensure they are fully aware of the context of the installation and service they will receive.

Whilst we agree with the proposals to not create the HAN to avoid incorrect data being displayed on the devices and necessary revisits to update these for example when prices change, we propose that there are some actions that a supplier could take. We believe that suppliers should as a minimum be capable of executing some service requests e.g. commission device, update HAN and handover of DCC controlled device for the gas proxy. Carrying out these actions could reduce the time on site for a second visit and could result in a less technically skilled operative visiting, freeing up more skilled resource for other installations.

***Q3. Do you agree that the legal drafting implements proactive I&L policy as proposed?
Please provide a rationale for your views.***

Generally yes, however we propose for New Connections, proactive Install and Leave should be permitted where a site is not listed on the DCC coverage database. This is because many sites will not have a post code at the point the developer requests the meter installation. As currently drafted this would be excluded.

We believe New Connections should be permitted even where these are not listed on the DCC coverage database. Once the DCC coverage database is updated with the new post code data, the installation would be completed in line with the proposals.

Maintenance of Smart Metering Systems

Q4. 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, the proposed drafting is sensible. We however have concerns over the period of the Installation Validity Period (IVP). Our preference is that the IVP should be set at 12 months as a minimum, to



enable supply logistics to adjust to the change, in an appropriate and efficient manner. A period of less than 12 months may result in potential additional costs as equipment may be stranded as there will not be enough time to manage complex processes for upgrading devices and applying Over the Air Firmware updates.

Simplification of Change of Supplier Flows

Q5. 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.

Yes.

Testing required to implement changes to the SEC

Q6. 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.

Yes.

Q7. 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.

Whilst not currently explicitly referenced within the SEC modification process, working groups and SEC sub-committees have already had discussion about the need to test releases prior to implementation.

Formalising this process seems a pragmatic step.

Enduring Data Provider Entry Process Testing

Q8. Do you agree with the proposal and associated legal drafting to provide enduring RDP Entry Process Tests? Please provide a rationale for your views.

Yes.

Q9. 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.

Yes.



Changes to the Enduring Testing Approach Document (ETAD)

Q10. 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.

Yes.

Provision of variant Communications Hubs for testing

Q11. 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.

Yes.

Changes to Section N to support SMETS1 Enrolment and Adoption by the DCC

Q12. Do you agree with the proposed changes and legal drafting in relation to Section N? Please provide any rationale.

Whilst we understand the intent behind the proposals, we do not believe the drafting as proposed delivers this.

Our understanding is that the DCC requires detailed sight of communication contracts that suppliers have with mobile communication providers. The contract for such services may sit between the Smart Metering System Operator (SMSO) and the communication service provider. The supplier in this case is not a party to such contract.

It may therefore not be possible even with the obligation for the supplier to provide the level of detail the DCC requires. It therefore seems extremely unfair to penalise a supplier with the threat of non-enrolment of metering devices for a lack of ability to provide details of a contract to which they are not a party.

If the objective of this proposed obligation is to enable BEIS to make an informed decision about how enrolment could be delivered, e.g. via existing SMSOs or directly by DCC then an option could be to request confirmation of terms on which Comms would be provided to the DCC.

Amendments to the Ofgem Significant Code Review process

Q13. 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, these are sensible changes.



Privacy requirements

***Q14. Do you have any comments on the proposed changes to Section H and Section I?
Please provide a rationale for your views.***

Yes, these are sensible amendments to align Other User requirements with those of licensed entities.

Making certain transitional variations enduring

Q15. Do you agree with the proposals to make certain transitional variations described in Chapter 3.4 enduring? Please provide a rationale for your views.

Yes. These changes provide a useful clarification.

Definition of Registration Data Provider Systems

Q16. Do you agree with the proposal to revise the RDP Systems definition and the associated legal drafting? If not, please provide a rationale.

Yes. The approach is sensible.

Changes to the SEC to enable it to accommodate multiple versions of Technical Specifications

Q17. 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?

The proposals go a long way to providing industry with a process and baseline from which it can manage these complex requirements.

We suggest these should go further to ensure that clear unambiguous documentation is provided to all parties to ensure effective management of installations and firmware upgrades resulting from these releases. It may be helpful to include in the SEC or associated guidance document worked examples for each release to assist understanding.

We propose that the IVP should be set at 12 months as a minimum, to enable supply logistics to adjust to the change, in an appropriate and efficient manner. A period of less than 12 months may result in potential additional costs as equipment may be stranded as there will not be enough time to manage complex processes for upgrading devices and applying Over the Air Firmware updates.

If there is a scenario where less than 12 months is required before expiry of the IVP we propose that suppliers should be able to install a device provided that within 28 days of the physical installation that the firmware has been applied and the device made compliant with the new release version.



We disagree with the comments at paragraph 126 regarding an explicit obligation on the DCC to maintain compatibility of the Comms hub and IHD. Whilst we recognise that the risk is small there could be situations in future where a change by the DCC to a Comms hub results in the IHD no longer being able to receive updates. This would be extremely costly for suppliers to replace the IHD for affected customers and maybe ultimately a cost borne by consumers.

Q18. 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)?

Yes. Whilst theoretically this is logical, in practice this will require new internal supporting business processes for supplier's to manage these events effectively to ensure systems line up correctly. Suppliers must be afforded appropriate time to adjust their internal arrangement accordingly.

Minor Miscellaneous Changes

Q19. 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 agree with the proposals. We would like some clarity regarding the intent of the comments in clause 130 of the consultation document. Whilst we understand the rationale for not activating H3.27, the final sentence "Instead, DCC may raise one if it wishes" seems to be contrary to the intent. We note the DCC has provided industry notice via the Smart Metering Operations Group (SMOG) of intention to raise such a modification. It is unclear under what will happen in practice.