

SBGI Response
To
Smart Metering Implementation
Programme:
Consultation on Draft DDC Prohibition
Order

Ref: 11D/957

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Contact Information:

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The SBGI Response

SBGI Utility Networks is pleased to provide this response to DECC's response to the consultation as an important step in moving towards the UK's low carbon economy.

SBGI is a trade association representing over 240 UK-based companies in the energy and utilities sector supply chain. It has three operational divisions; Utility Networks, the Heating & Hotwater Industry Council (HHIC) and ICOM Energy Association and works in close cooperation with other trade associations within the sector.

Our Utility Networks Division represents distribution network owners and the products and services supply chain thereto, in particular meter manufacturers and installers and Data and Communication suppliers to the utility industry.

Many of our members may have responded separately to this consultation. The response below highlights views held common by our member companies. In cases where a common viewpoint has not been possible, this clearly stated and our members' range of views has been documented for information.

Annex 1: Digest of consultation questions.

	Questions	SBGI Answers
1	Do you think any party other than DCC would be captured by the Prohibition Order as set out? If you consider other parties would be captured please identify them and indicate whether you consider this a short term or long term issue.	SBGI are concerned that there may be some capture of other parts of the industry. Because the prohibition only references energy suppliers or users of DCC, it will be necessary to ensure that no other party, such as Prepayment system Operators, must use DCC long term
2	Do you have any views on the definition of the smart meter set out in the draft Order?	SBGI believe that the order may have captured prepayment devices and volume conversion devices with electronic communications.
3	Do you have any further comments of the approach being adopted to structuring the licensable activity?	It should include all DCC users or users of Smart Data.
4	Do you have any comments on the draft licensable activity as set out in article 4 of the draft Order (Annex2)?	Arrangements are also required to include other interested parties. The licensable activity only forces communication with suppliers, not networks and other parties, and could capture secondary meters in some circumstances.
5	Do you have any comments on the conclusions set out in respect of the proposed consequential amendments or on those assessed as unnecessary?	SBGI have no comment on this question.
6	Do you have any comments on the consequential amendments as set out in the draft Order?	SBGI have no comment on this question.
7	Do you think that the DCC should be included in the standards of performance framework? Do you have any general views on the regulation of DCC's relationship with consumers?	SBGI believe this is better covered in DCC license and the Smart Energy Code.
8	Do you consider it necessary for the DCC (or its service providers) to be considered a "statutory undertaker"? Please explain the reason for your answer.	SBGI do not believe that the DCC or any of its service providers should be considered a Statutory Undertaker.