

ESTA RESPONSE TO:



SMIP – Consultation on security risk assessments and audits in the period before the DCC provides services to smart meters
DECC

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ESTA Energy Services and Technology Association

ESTA is the UK Industry Body representing suppliers of products, systems and services for Energy Management. The 120 members cover energy consultants, aM&T providers, controls manufacturers through to full Energy Services/Contract Energy Management mainly working in the I&C sector.

ESTA is engaged with UK Government policies on Energy and Climate Change, The Green Deal, Energy Performance of Building Directive, Part L Building Regulations, Display Energy Certificates, Carbon Reduction Commitment, Energy Services Directive and the roll-out of smart and advanced meters. It also provides UK input to developing international energy management standards and Chairs several BSI committees.

ESTA members are key to the UK's realisation of a low carbon, secure and affordable energy future. Our members provide equipment, systems and services for energy management to reduce energy demand at source and including renewables.

Our response is a majority consensus of the members involved. Where ESTA members respond directly, they may offer differing opinions on some issues which we respect as expressing their own definitive view.

SMIP – Consultation on security risk assessments and audits

ESTA welcomes the opportunity to respond to this consultation and continues to provide its support for the smart meter implementation programme and its objectives.

We envisage that a number of non-domestic smart meters will be installed in opt-out mode and will need to be read by an independent data retriever. It is also possible that this could occur in domestic scenarios as part of a multi-site operation. Our concern with license conditions surrounding security is that support could be limited or withheld for the opt-out data retrieval process.

Whilst we understand the need for stringent and practical security measures, these should not be at the expense of a level playing field for all parties in the process. It is possible that such measures could be used in such a way to restrict the opportunity for existing market players to demonstrate to potential Communications Service Providers (CSPs) just what can be achieved through data retrieval.

Following on from the input ESTA gave to the SEC Governance process we believe that the foundation stage is critical in assessing what the market drivers and potential barriers to entry are for energy best practice to be realised.

Below are responses to the specific questions set out in the consultation.

Question 1: Do you consider that the draft licence conditions deliver the policy intention outlined in this document? Please provide comments on where the drafting could be amended or clarified.

The license condition should provide for ensuring that such opt out activity may continue, unfettered by security or other supplier procedures.

Question 2: Do you have any comments on the proposed approach that suppliers should carry out a number of good practice security disciplines and procedures as is set out in this document?

Yes. However, there is also the possibility to disable remote disconnect completely in the foundation stage. This would overcome many of the security issues.

Question 3: Do you have any further comments with regard to the issues raised in this document? We also welcome general comments around the approach to small suppliers, the processes expected of suppliers in general, and any related costs.

ESTA believes that such a license condition will incur unnecessary costs and will not serve the best interests of consumers. Security still remains an unknown (certainly publicly) and SMETS1 is by no means clear on what is required. Security is likely to be resolved in SMETS2 and ESTA see little benefit in requiring suppliers to do it on a temporary basis in foundation. It will be expensive and restrictive to those who already operate in the market.