

## **Smart Metering Implementation Programme: A consultation on the detailed policy design of the regulatory and commercial framework for DCC**

Northern Powergrid Holdings Company is the electricity distribution network operator (DNO) for the north east, Yorkshire and parts of northern Lincolnshire, operating through its two wholly-owned subsidiaries, Northern Powergrid (Northeast) Limited and Northern Powergrid (Yorkshire) plc. We welcome the opportunity to take part in this consultation. We have taken part already in a number of interactions with DECC and its consultants on the subject of smart metering and look forward to continuing to make a constructive contribution to this initiative.

Our detailed responses to the questions are included later in this response, but it may be helpful to summarise our views on the key issues below. On a general point, we believe it is important to find ways of continuing to move the programme forward even if available information is not sufficient to take firm decisions. Our comments below on smart grids are provided with this in mind.

Our key points are:

- The general objectives of the DCC and of the Smart Energy Code need to include the promotion of an efficient, co-ordinated and economical system of electricity distribution.
- The interests of non-licensees, such as meter asset providers, also need to be taken into account.
- Charges for the DCC should be cost-reflective and should be allocated so that those players driving a cost should pay an appropriate share of the charge. Because DNOs will be unable to make much use of DCC core services until there is significant coverage, DNOs should not therefore be charged for DCC internal costs pre “go-live” or in the early years of operation. In return, DNOs could provide relevant services to the DCC, such as the provision of start-up registration data, free of charge.
- If DNOs were, however, to be required to fund early costs, they would need to be given reassurance that these costs would be recoverable.
- It is not possible for DNOs to decide on the cost / benefit of the elements of the Minimum Core Service Requirements in the absence of knowledge of the costs involved. However, we do have some comments on our understanding of both the benefits and the costs:
  - On the one hand, the Energy Networks Association (ENA) has published a paper that documents the smart meter **benefits** to network operators. For these benefits to accrue, the functionality to be included in the meter, as defined in the Industry Draft Technical Specification and the communications system, need to have sufficient capability for messages to be transmitted between the meter and users. There are clearly difficulties in defining the core and elective services prescriptively at this stage, but it is essential that the communications infrastructure does not unduly limit the capability of the smart metering system. Accordingly, we consider that all the services included in the BPDG process flows should be classed as core services.

- On the other hand, there remain considerable uncertainties associated with communications **cost** drivers. This, coupled with the fact that the ENA benefit analysis is at a high level (on the basis that the smart metering system can generally gather data and facilitate active network management), makes it impossible to carry out a detailed cost/benefit analysis on individual components. An ill-informed assessment could result in requesting messages whose cost did not justify the network benefit as well as unnecessarily rejecting potentially valuable data flows that did not add materially to costs. If detailed costs are not available at this time, it would be helpful if some order of magnitude costs could be provided with some indication of the key cost drivers. Communications infrastructure providers could be asked to tender on a small range of alternative communication systems which offer different levels of service and also provide information as to how they could develop and expand the capability of their system to ensure that it meets the country's evolving future requirement.

We hope that you find these summary comments and the more detailed responses useful. Please make contact with \_\_\_\_\_ in the first instance if you would like to discuss further.

Contact details:

<b>Response to consultation questions</b>	
<b>Chapter 2: Proposed regulatory approach to DCC</b>	
<b>1.</b>	<b>Please provide views on the approach to basing the prohibition upon contracting with all licensed suppliers in respect of all domestic smart meters, and on the way in which the specific wording of the prohibition should be developed</b>
	<p>Northern Powergrid considers that the licensable activity is too narrowly drawn. Whilst we recognise that the licensable activity is based on a negative and does not therefore prevent the DCC from undertaking other activity, it makes that other activity optional and potentially less secure. The DCC is expected to provide a means of communication for data other than that required by suppliers. For example, DNOs require information on “last gasp” and meter registration. DNOs may need some types of information, for instance, information related to the development and implementation of smart grids, more frequently than that required by suppliers. The definition may also affect what are considered to be “core” services as opposed to “elective” services and hence the price associated with them. It would therefore be preferable for the activity to be cast in terms of information required by all supply, distribution and transmission licensees in pursuit of their regulatory duties, rather than just supply.</p> <p>Other key parties will also need to be able to obtain data managed by the DCC. For example, meter asset providers (MAPs) will need to be able to track their assets including on change of supplier and will therefore need meter registration and removal data independent of suppliers. Without such a facility, end-users may well end up paying more for the service unnecessarily because MAPs will have to price in risk. We see no evidence of important issues like this being currently considered.</p>
<b>2.</b>	<b>Do you think there will be any persons other than DCC who might inadvertently be captured by a definition structured in this way?</b>
	No. It is restricted to activities that will only be carried out by the DCC and in fact ensures that there is a single route for such information to be passed between all licensed bodies.
<b>3.</b>	<b>Do you have any other comments on the form of the licensable activity?</b>
	No.
<b>4.</b>	<b>Please provide comments on the proposed changes to legislation identified in Table 2.1 and Table 2.2 and any other possible changes that you consider might be appropriate.</b>
	Sections 7A and 8A of the Electricity Act may also need amendment (and as a consequence Section 33 of the Utilities Act would need adding to table 2.2). Since the prohibition on the same person holding both a distribution licence and a supply licence is dealt with in Section 6(2) of the Electricity Act, it is not clear why the prohibition on a DCC licensee holding another type of licence is to be dealt with in the DCC licence itself.
<b>5.</b>	<b>Do you agree with the proposal to have a single document with a single set of licence conditions that apply to both licences?</b>
	Yes. Otherwise, there could be potential conflict between the requirements of the two licences.
<b>6</b>	<b>Do you agree with, and have any comments on, the proposed approach to</b>

	<b>establish all of the DCC licence conditions as “special” conditions?</b>
	As paragraph 2.26 points out, the distinction is immaterial.
<b>7.</b>	<b>Do you have any comments on the scope and nature of the consequential licence changes that we propose to make?</b>
	No.
<b>8.</b>	<b>Are there any other consequential licence changes that you consider might be necessary as a result of the creation of the new licensable activity?</b>
	No.
<b>9.</b>	<b>Please provide any comments on the proposed approach in relation to geographic scope of the DCC licence and provisions relating to its duration.</b>
	We have no comment to make.
<b>Chapter 3: DCC licence conditions</b>	
<b>10.</b>	<b>Do you agree with the proposed general objectives of DCC set out above?</b>
	<p>The obligation on the DCC to carry out its business in a manner that promotes or facilitates competition in the supply of gas and electricity needs to be expanded, along the lines of s9 of the 1989 Electricity Act, to include the promotion of an efficient, co-ordinated and economical system of electricity distribution. This is needed in order to include activities relating to services to be provided to DNOs, including the development of a smart grid. The obligation to operate an efficient, co-ordinated and economical data and communications system is narrower than this and so the additional wording is needed.</p> <p>It would also be sensible to check whether the objectives need amending to ensure compatibility with the EU Third Internal Energy Package.</p>
<b>11.</b>	<b>Do you think it is necessary to include any statutory duties on DCC in the Gas and Electricity Acts or is it appropriate address these issues in the DCC licence alone? Please provide the rationale for your views.</b>
	We have no comment to make.
<b>12.</b>	<b>Do you agree that any obligation to facilitate competition in the area of distribution should be considered as part of the implementation of any future smart grids related arrangements?</b>
	We agree that, whilst in the future there may be a need specifically to address any competition issues associated with smart grid development, at the moment the smart grid debate is relatively immature and it would be premature to develop any specific arrangements.
<b>13.</b>	<b>Do you agree with the approach proposed in relation to the protection of consumers’ interests?</b>
	Yes.
<b>14.</b>	<b>Do you think DCC should have a separate objective to promote (or facilitate) energy efficiency?</b>
	Yes.

<b>15.</b>	<b>Do you agree that SEC licence condition should be drafted so as to provide flexibility over the future scope of the SEC, i.e. that the scope of the SEC in the DCC licence condition should be drafted in a permissive manner?</b>
	Yes, so long as there is an appropriate governance process for any changes. As we indicated in our response to the August consultation on the draft licence conditions and technical specification, we believe that it would be appropriate for the SMETS to be governed within the same governance process and for DNOs to be involved appropriately.
<b>16.</b>	<b>What are your views on the SEC Applicable Objectives set out above?</b>
	For the reasons given in answer to question 10 above, the objectives should be extended to include the promotion of an efficient, co-ordinated and economical system of electricity distribution.
<b>17.</b>	<b>Do you agree that the SEC should be designed to take into account consumers' interests by meeting its applicable objectives, rather than having an explicit objective related to the protection of the interests of consumers?</b>
	Yes.
<b>18.</b>	<b>Should there be a SEC objective related to promoting (or facilitating) efficiency of energy networks?</b>
	See the answer to question 10. The wording needs to relate to "efficient, co-ordinated and economical", as in the statutory duties of DNOs.
<b>19.</b>	<b>Do you think the SEC should have a separate objective of promoting (or facilitating) energy efficiency?</b>
	Yes.
<b>20.</b>	<b>Do you agree with the definitions of the services that DCC should be required or permitted to provide?</b>
	<p>Yes. We agree that there should be categories of service that include 'core' and 'elective' services and that the provision of core services to users is mandatory. We assume (since the document is not explicit on this point) that the price of core services will be regulated, while the price of elective services will be negotiated. As a DNO, therefore we have a keen interest in influencing which services fall into which category, since the definition in the summary table provides little clarity about what services are 'core' or 'elective'. We are keen to work with DECC to develop the schedule of core services, but, since it is essential that the communications infrastructure does not unduly limit the capability of the smart metering system, we consider that all the services included in the BPDG process flows should be classed as core services.</p> <p>We would make two further points. First, it would be prudent to test the definitions against the core processes being developed by the BPDG to ensure they encompass all the required services. Second, these definitions need to accommodate data services to those non-licensed industry parties including meter asset providers (MAPs) and meter operators (MOPs) who will be key players in delivering a smooth roll out.</p>
<b>21.</b>	<b>In relation to which non-compliant metering systems should DCC be required to offer services?</b>
	In general we would prefer the DCC to be the single conduit for all meter systems, following the roll-out.

<b>22.</b>	<b>In relation to which non-compliant metering systems associated with energy supply at consumer premises should DCC be permitted to offer services?</b>
	We have no comment to make.
<b>23.</b>	<b>What information should be made available to all users about:</b> <ul style="list-style-type: none"> <li>• <b>elective services;</b></li> <li>• <b>value-added services?</b></li> </ul> <b>Should information be restricted to that required to assess the impact on other users of DCC services or should there be full transparency? Should DCC be required to make available the detailed commercial terms and conditions of such services?</b>
	<p>Provided the DCC has obligations to ensure that, in the provision of services (whether they be core, elective or value-added), it sets charges on a cost-reflective and non-discriminatory basis and avoids cross subsidy between core and elective services / value-added services, we see no reason why full transparency is required for terms of elective and value added services. If such services are provided bilaterally we see no reason why the details of the commercial terms and conditions for specific contracts should be made available to other parties. However, it may helpful if example heads of terms are made available for parties considering requesting such services. These example heads of terms could be set out in the SEC.</p>
<b>24.</b>	<b>Do you think the detailed terms and conditions for elective and value-added services should be set out in the SEC or included in bilateral agreements between DCC and persons to whom it is providing services?</b>
	Please see our answer to question 23.
<b>25.</b>	<b>Are there any other matters that we have not addressed related to the nature of services provided by DCC? (Note that provisions addressing independence and non-discrimination in the provision of DCC services are covered in paragraphs 3.119 to 3.120).</b>
	Please see our response to question 20. DECC must ensure that those non-licensed parties who are key to ensuring a smooth roll out and smooth change of supplier processes, including meter asset providers and meter operators, have direct access to data and any other necessary DCC services.
<b>26.</b>	<b>Do you agree that DCC should be required to externally procure specific services and have principles that determine what other services it should externally procure?</b>
	It would seem reasonable for the DCC to procure all services apart from those it can reasonably demonstrate that it can do more efficiently in-house. We agree that there should be documented principles on which types of services are appropriate for outsourcing,
<b>27.</b>	<b>Do you agree with the procurement objectives for DCC identified above?</b>
	Yes. In addition to encouraging flexibility, the procurement objectives need to have regard to the achievement of scalability, particularly in relation to communications services.
<b>28.</b>	<b>Do you agree that DCC should be required to produce a procurement and contract management approach document?</b>

	Yes.
<b>29.</b>	<b>We seek your views as to whether the procurement and contract management approach document should be required to be submitted for approval by the Authority and/or the Secretary of State.</b>
	We have no view on this provided the document is appropriately approved and governed.
<b>30.</b>	<b>Is the scope of the proposed prohibition on discrimination, which is limited to undue discrimination between uses or classes of users, adequate?</b>
	Yes, it would seem to be adequate.
<b>31.</b>	<b>Are any specific provisions needed which require DCC not to discriminate between service providers? Or is it sufficient to rely on obligations on DCC to maintain and develop an economic system and, in the procurement of DCC services, to promote competition in the provision of such services?</b>
	We have no comment to make.
<b>32.</b>	<b>Do you agree that DCC should be independent of service providers? Do you agree that a de minimis level of affiliation between DCC and service providers should be permissible?</b>
	Whilst ownership is important we believe that it is more important for the DCC to be transparent regarding its procurement activities, so that decisions may be challenged if they are felt to be made on inappropriate grounds.
<b>33.</b>	<b>What level of affiliation do you consider should be set for the maximum level of shareholding or control of any individual service provider may have in DCC?</b>
	See response to question 32.
<b>34.</b>	<b>Do you agree with the business separation between DCC and users that is proposed? More specifically, do you agree that no DCC user that operates in a competitive environment should be permitted to have more than a 20% shareholding or control in DCC, and that DCC and its subsidiaries should not be permitted to have any shareholdings in users or service providers?</b>
	See response to question 32.
<b>35.</b>	<b>Do you agree that it is not necessary to explicitly require business separation between DCC users and DCC service providers?</b>
	We agree that it is unnecessary.
<b>36.</b>	<b>Should DCC be prohibited from using confidential information for any purpose other than the licensed DCC activity? Should DCC be obliged to impose this restriction on service providers contractually?</b>
	<p>There should be a general prohibition on both the DCC and service providers from any such use of confidential information, subject to the possibility of creating an exemption, under appropriate governance, if it is demonstrated that specific data could have wider benefits, for example in terms of environmental benefits or the promotion of smart grids.</p> <p>There should clearly be no such restrictions on the use of non-confidential data.</p>

<b>37.</b>	<b>To what extent do you believe that the existing financial ring fencing provisions (and those proposed by Ofgem in its recent consultation on this issue) should be included in DCC's licence?</b>
	We have no comment to make.
<b>38.</b>	<b>Do you agree that a flexible approach to financial security should be adopted and, if a financial security is required, what level of financial security should be provided?</b>
	We have no comment to make.
<b>39.</b>	<b>What are your views on whether it would be appropriate to require DCC to pay for a proportion of the costs of appointing a new DCC in the event of an early licence revocation? Do you think that this potential liability should be reflected in the level of financial security required from DCC?</b>
	We agree that this potential liability should be reflected in the level of financial security required from DCC.
<b>40.</b>	<b>Are there any other conditions that you consider should be imposed in DCC's licence to ensure its continued financial viability?</b>
	We have no comment to make.
<b>41.</b>	<b>Would it be appropriate for a special administration scheme to apply to DCC?</b>
	Yes. Given the intrinsic nature of the DCC within the settlements process, it would be appropriate to ensure that special administration scheme applies to the DCC.
<b>42.</b>	<b>Do you agree with that DCC should be required to ensure business continuity of service providers and should monitor the provisions that they have in place to deliver business continuity?</b>
	Yes.
<b>43.</b>	<b>Do you believe that DCC needs to include in its service provider contracts any further protections which help to secure against, or mitigate the consequences of, a financial failure of a major service provider? Please provide examples of any additional protections you consider suitable.</b>
	Yes, but we are not close enough to the potential service provider contracts to offer specific examples.
<b>44.</b>	<b>Do you agree that it is appropriate to grant the initial DCC licence for a ten year period?</b>
	The DCC will need to have longevity in its planning and appointment of service providers, so 10 years seems an appropriate level of time.
<b>45.</b>	<b>Do you agree that flexibility for the Authority to decide to extend the initial DCC's licence by up to 5 years would be desirable?</b>
	Yes.
<b>46.</b>	<b>Do you agree with the approach described for the treatment of DCC internal costs for any extension period?</b>
	We have no comment to make.
<b>47.</b>	<b>Do you agree that DCC should be required to ensure that any critical services can</b>



	<b>be transferred to a successor?</b>
	Yes.
<b>48.</b>	<b>What scope of matters governing the handover to a successor do you think need to be included in DCC's licence?</b>
	One key item for inclusion should be an obligation to provide an adequate level of specialist resource to work with the DCC successor company for a predefined handover period to ensure business continuity.
<b>49.</b>	<b>Do you agree that DCC's licence should be capable of being revoked in the event of a repeated or material failure to meet service levels?</b>
	Yes.
<b>50.</b>	<b>Do you agree that the DCC licence should contain a condition which gives it a high-level obligation in relation to foundation and subsequent rollout, activities and that the detailed obligations can be dealt with as part of the development of the SEC?</b>
	Yes.
<b>51.</b>	<b>Do you agree that DCC should have a high-level obligation, albeit initially "switched off", relating to the provision of meter point/supplier registration services?</b>
	Yes. There also needs to be an explicit obligation to assist other licensees with the handover.
<b>52.</b>	<b>Do you agree that conditions should be introduced in other licences providing the ability to release other licensees from the requirement to provide meter point/supplier registration services at some point in the future?</b>
	Yes. Consideration also needs to be given to the transfer process for customer groups into the DCC registration and the licence requirements for this. The scope of the extent of the processes being transferred is important. If the DCC is only dealing with domestic customers, there is always going to be the need for other parties to have registration systems and processes for the different customer groups. The overall efficiency of the process may need to be considered by the appropriate regulatory bodies in order to ensure that customers do not pay more than they need to for services spread amongst multiple providers.
<b>53.</b>	<b>Do you agree that DCC and other relevant licensees should be subject to an obligation requiring the licensee to take steps to facilitate the transfer of meter point/supplier registration activities to DCC?</b>
	Yes, subject to the need to ensure that other licensees are satisfied with the robustness of the new arrangements.
<b>54.</b>	<b>What dispute mechanism would be appropriate to apply to disputes involving DCC and who should be enabled to determine such disputes?</b>
	We have no comment to make.
<b>55.</b>	<b>Do you believe that DCC should be required to operate its business in a way that ensures it does not restrict, prevent or distort competition in gas shipping, the generation of electricity and participation in the operation of an interconnector?</b>
	We have no comment to make.

<b>56.</b>	<b>Do you have views on the additional conditions discussed above?</b>
	No.
<b>57.</b>	<b>Are there any additional conditions that you would wish to see included?</b>
	No.
<b>58.</b>	<b>Is it appropriate to consider extending the Secretary of State's powers to provide equivalent powers to modify DCC's licence conditions as it does for other energy licences for the purposes of implementing smart metering?</b>
	We have no comment to make.
<b>Chapter 4: Revenue requirements</b>	
<b>59.</b>	<b>Do you consider that it is practicable for DCC licence applicants to provide costs for undertaking meter point/supplier registration? Or is it more appropriate to include a specific reopener for DCC's costs of undertaking meter point/supplier registration?</b>
	DNOs need to be assured of a high quality service with close attention to risk management as the registration process underpins the settlements process. Since the scope of what is required for meter point/supplier registration should be reasonably clear, applicants should be able to provide costs. The timing, however, is uncertain and so it makes sense to include a specific reopener to allow the DCC to recover costs at the appropriate time. The transfer of meter point registration to the DCC will also have an impact on DNO costs, but because of the likely timing the best way to deal with this impact would be to take this into account in discussion for RIIO-ED1 and pay reasonable net costs in respect of costs incurred by DNOs in DPCR5.
<b>60.</b>	<b>Do you have views on the relative benefits of the two options (cost pass through and volume drivers) for recovery of DCC internal costs associated with SEC modifications?</b>
	We would welcome more clarity on how each option would work in practice in relation to DCC internal costs before offering any views.
<b>61.</b>	<b>Do you have a view on the appropriate materiality threshold (trigger) for the revenue reopener?</b>
	We have no comment to make.
<b>62.</b>	<b>Do you consider that any other cost areas may require mechanisms to deal with uncertainty?</b>
	We have no comment to make.
<b>63.</b>	<b>Do you agree that market share should be based on MPANs and MPRNs that are mandated to receive smart metering systems, rather than all MPANs and MPRNs?</b>
	Yes, the former appears to be more cost reflective.
<b>64.</b>	<b>Do you have a view on whether suppliers of only larger non-domestic customers should be charged a proportion of DCC internal costs?</b>
	No.
<b>65.</b>	<b>We welcome views from stakeholders in regards to charges on network operators for DCC internal costs pre-"go-live" and whether they should charge DCC for</b>

	<b>services provided to DCC.</b>
	<p>Charges for the DCC should be cost-reflective and should be allocated so that those players driving a cost should pay an appropriate share of the charge. DNOs should therefore not be charged for DCC internal costs pre “go-live” or even in the early years of “go-live”. Initial DCC core service costs are likely to be driven by supplier activities including registering new smart metering systems, processing meter reads and consumption data and managing change of supplier processes. DNOs are unlikely to be able to make use of DCC services associated with such things as messages, alerts or half hourly data for network planning until later in the roll-out when there is a significant population of smart metering systems. We expect that suppliers will fund the DCC’s change of supplier activities as these support competition in supply. DNOs would expect to receive core industry data flows free of charge as notification outputs from such processes, where data flows are required to support regulatory obligations including facilitating use of system billing and trouble call management.</p> <p>DNOs could in return for receiving such data free of charge provide services to the DCC free of charge, including the provision of start-up registration data to assist “go-live”.</p> <p>If, however, DNOs were required to fund some of the DCC internal costs within the DPCR5 period, they would need to be able to recover these costs from customers. There would be a need to assess the magnitude of these internal costs and agree how they should be apportioned between suppliers and DNOs. Such arrangements could also be appropriate for the internal costs that DNOs will incur making changes to their systems to interface with the DCC. Providing reassurance that DNOs will be able to recover costs incurred pre “go-live” would encourage their involvement in the detailed design and implementation work which should help to streamline the development.</p>
<b>66.</b>	<b>Do you agree that DCC should only begin to charge users for communication service providers’ costs from “go-live”? Please provide reasons as to why this is or is not appropriate.</b>
	Please see our answer to question 65.
<b>67.</b>	<b>Do you have a view on whether the data service provider(s) should be treated differently from communication service providers and be allowed to recover its fixed costs evenly over the length of its contract from “go-live”? Please provide reasons why this is or is not appropriate.</b>
	We have no comment to make.
<b>68.</b>	<b>Is it appropriate that the allocation of costs on suppliers during rollout be based on the suppliers’ rollout plan for the year plus actual smart meters installed in preceding years? If so, how can this option for allocating costs during rollout be improved? If not, what is your preferred option and why?</b>
	Allocating costs based on a mechanism that takes account of roll-out plans and actual past performance would appear to be cost reflective.
<b>69.</b>	<b>Do you have a view on how any additional costs resulting from suppliers exceeding their rollout plans should be allocated? Should DCC be able to pass through to the relevant supplier any higher costs resulting from this (or should such costs be averaged across all users)?</b>
	No comment beyond our answer to question 68.

<b>70.</b>	<b>Do you agree that network operators should be charged in line with their market share?</b>
	No, please see our answer to question 65. If suppliers arrange their roll-out plans by region, a DNO might be faced with a disproportionate share of DCC costs where the roll-out was relatively low in its operating area. It would be more cost-reflective for DCC costs to be funded by suppliers based on their roll-out plans given the bulk of DCC core services in the early years will be mainly attributable to registering new smart meter systems and change of supplier activity.
<b>Chapter 5: Charging methodology</b>	
<b>71.</b>	<b>Do you agree that a standing charge should cover the service providers' fixed costs for providing core services, DCC's internal costs and the SEC management funding requirements?</b>
	It is difficult to comment on the details of charging methodologies in the absence of some visibility of cost estimates for the different elements of DCC and SEC funding requirements. However, this approach seems reasonable provided that the three elements (core service fixed costs, DCC internal cost and SEC management costs) are apportioned accordingly. For example allocation of the SEC cost should reflect the influence that different users have on the code.
<b>72.</b>	<b>Do you agree that a proportion of service providers' fixed operating expenditure should be converted to volumetric charges?</b>
	Please see our response to question 71. We agree that the charging structure should be such that it encourages greater efficiency in use of the DCC services and that there is transparency in the charging methodology to facilitate this. Given the experience of DNOs from their charging methodologies, we would suggest a peak pricing basis that encourages users to make efficient use of the capacity of the systems.
<b>73.</b>	<b>Do you agree that the proposal for postage stamp charging is consistent with the objectives of the smart metering programme?</b>
	Yes, as this approach would seem to allocate cost more fairly, particularly in relation to communication costs for hard-to-service geographical locations. But we would recommend that the structure of these charges should be adapted to ensure efficient use of DCC systems (possible through time-of-use tariffs).
<b>74.</b>	<b>Should postage stamp charging apply to all users including network operators?</b>
	<p>Please see our response to questions 65 and 70. In the later years of the roll-out when there is a sufficient population of smart meters to enable network operators to begin using data for more sophisticated purposes, a postage stamp approach may be appropriate.</p> <p>Postage stamp charging needs to be based on a DNO regional basis at least for the volumetric charges otherwise the DNO would not be incentivised to develop innovative methods of minimising the volume of data whilst maintaining the quality of information that can be extracted from that data.</p>
<b>75.</b>	<b>Do you agree with the proposed charging principles?</b>
	<p>Please see our response to question 71.</p> <p>In addition, there should be a general principle relating to fairly allocating fixed and volumetric charges to users, specifically between DNOs and suppliers. The allocation</p>

	probably should relate to the costs driven by the requirements or categories of users – at the moment it is unclear which components of the DCC / WAN service actually drives the costs.
<b>76.</b>	<b>Do you consider that an objective for the charging methodology should be to promote innovation in the supply of energy, provision of energy related services and energy distribution?</b>
	Yes, but the primary objective should always be to ensure efficient use of the DCC network.
<b>77.</b>	<b>Do stakeholders have views on whether DCC's internal costs should be allocated across the different types to users on the same basis as service provider fixed costs?</b>
	Please see our response to question 71.
<b>78.</b>	<b>Do you agree with the proposals to charge users for extensive assessment and design work in relation to AMRs? Should a similar approach be adopted for other elective services offered by DCC, regardless of the user accepting the service?</b>
	We have no comment to make.
<b>79.</b>	<b>Do you agree that “a second comer principle” can be applied?</b>
	We have no comment to make.
<b>Chapter 6: Core services – WAN requirements</b>	
<b>80.</b>	<b>Please indicate whether the Minimum Core Service Requirements (i.e. message size, frequency, response time and coverage) for each of the message flows in the above tables can be modified to reduce the potential impact on the WAN cost without compromising the corresponding benefits. Please quantify the additional Programme benefit that could be realised by including each of this message flows in the aggregate Minimum Core Service Requirements.</b>
	<p>Northern Powergrid is continuing to work with the other DNOs in order to review the network-related Core Services as presented in Tables 6.2 and 6.3. The current view is that these core services are broadly correct although there may be scope for relaxing some of the response times and messaging frequency. The emerging DNO view of these current core services is presented in the Appendix to this response, and we are in the process of arranging a meeting with the DECC team tasked with assessing the data requirements to discuss these changes.</p> <p>We have some general concerns about the size of the larger messages. It would be helpful if there was additional clarity on the data items that form part of the message and how they map onto to the data items as defined in the Industry Draft Technical Specification. There also seems to be duplication of some of the requirements between Tables 6.1 and 6.2. Whilst there are some items e.g. auxiliary switching, which are required by both suppliers and DNOs and could be implemented concurrently, in practice there would need to be co-ordination between DNOs and suppliers to avoid customer confusion. Hence when defining the communications requirements, synergies between the items should be considered.</p> <p>We have a number of concerns relating to the cost of the WAN infrastructure:</p> <ul style="list-style-type: none"> <li>• There is little visibility of the anticipated overall cost and it is difficult to assess the materiality of the communications infrastructure cost on the wider smart metering programme. Hence it is difficult to understand the magnitude and</li> </ul>

	<p>materiality of the problem we are seeking to address.</p> <ul style="list-style-type: none"> <li>• Further transparency on the communications infrastructure cost drivers would help to inform the debate, i.e. whether it is overall data volume, frequency of the message or response time that materially influence the costs, and whether the costs are different for the different type of communications solutions being considered.</li> <li>• It would be helpful if the high-level costs indications were available from DECC including estimated cost increases caused by some of the more onerous message requirements. Even more informative would be if the costs for different messages were presented as a menu. However, if this is not feasible at this stage, it might be possible to present these messages in a cost or size order (assuming that this order is the same for the various communications infrastructure under consideration) so that parties could see which are the major cost drivers. This is important as it would be unfortunate if any valuable messages were rejected on the basis that they were inaccurately considered too expensive only for it to emerge later that they did not drive significant costs.</li> <li>• It might be possible for communications infrastructure tenderers to submit tenders for a small range of differing requirements ranging from a minimalist solution to one with all the requirements included. This would allow a much more accurate evaluation and informed discussion of the costs involved.</li> <li>• In terms of managing the data traffic, time of day may be an important consideration. For example a mobile telephone operator may not want to carry some of the large downloads during the day, but could accommodate this overnight when customer demand on their networks is at its lowest.</li> <li>• Following on from this point, developing the communications requirements from a Service Level Agreement perspective might enable the communications provider to cost effectively manage peaks in the potential communications traffic e.g. in Table 6.2 Item 1, 98% of responses in 5 minutes 1% in 20 minutes and 1% within an hour. Such an approach would enable them to prioritise more critical data transfers.</li> </ul> <p>The higher cost message flows identified in Table 6.2 primarily relate to data collection from the smart metering system for improved network planning and operation, and the ability to issue controls to the smart metering system to actively manage the network. The analysis carried out by Imperial College for the ENA in April 2010 showed that the demand response benefit associated with smart meters, presented in terms of Net Present Value avoided distribution networks reinforcement costs, ranges between £0.5bn to around £10bn, depending on penetration scenarios of low carbon technologies. An implicit assumption is that the smart meter data is available and the control functionality is available. It may be theoretically possible to undertake additional modelling to assess the reduction in benefits if sub-optimal data sets or sub-optimal control were available from the smart metering system. But we are of the view that the financial benefits are sufficiently compelling that the core services as defined in Table 6.2 and the DNO services in Table 6.3, as refined by the DNOs as part of the consultation process, should be retained.</p> <p>The communication link between each smart meter and the DCC is an integral part of the smart metering system. We recognise that specifying the requirement of the communications infrastructure is particularly challenging as there are significant uncertainties about the overall data volumes, frequency and the speed with which data needs to be sent both during the roll out period and after 2019. It is essential that the communications system has sufficient capability to allow the benefits to be delivered to</p>
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	2019 and beyond and that the capability of the smart meters themselves is not constrained by a communications system. There is a need to ensure that there is sufficient flexibility in the communications infrastructure such that the future requirements can be accommodated without a major communication system replacement.
81.	<b>Please quantify the additional benefit, if any, that could be realised by using the ‘User Target’ rather than the ‘Minimum Core Service Requirement’ in table 6.1. as basis for the procurement of DCC communication services.</b>
	More information on costs is needed before this question can be realistically answered.
82.	<b>Please provide views on whether the Service Requirements described in the above table represent the Minimum Core Service Requirements. Please also indicate whether in your view there are any additional Minimum Core Service Requirements not identified in the above table, and for any such requirement please quantify the additional benefits, if any, that could be realised.</b>
	See answer to question 81.
<b>Chapter 7: Performance incentives</b>	
83.	<b>Please provide comments on the incentive regime proposed for DCC.</b>
	We have no comment to make.
84.	<b>Do you consider it appropriate and feasible for the SEC panel and DCC to negotiate KPI targets?</b>
	We have no comment to make.
85.	<b>Do you have views on the use of an independent audit of DCC performance? Should this be on a regular and/or ad hoc basis?</b>
	We have no comment to make.
86.	<b>Do you consider that a sharing mechanism should be in place for DCC internal costs? Should a sharing mechanism be included in the contracts with the service providers?</b>
	We have no comment to make.
87.	<b>Do you consider that it is appropriate to invite DCC licence applicants to propose KPIs?</b>
	We have no comment to make.
<b>Chapter 8: Adoption of Foundation Stage communication contracts</b>	
88.	<b>Are the criteria for adoption of contracts discussed in paragraphs 8.8 and 8.9 appropriate? Are there any additional criteria that should be included? Can quantitative thresholds for any or all of criterion be defined and, if so, how?</b>
	We have no comment to make.
89.	<b>Do you agree with our approach to identifying the guaranteed adoption volume of Foundation Stage smart metering systems? Are the factors we have identified the appropriate ones? What are your views as to the appropriate values of the various parameters identified in Table 8.1?</b>
	We have no comment to make.

90.	<b>Do you agree that DCC should be able to decide to adopt communication contracts associated with Foundation Stage smart metering systems in excess of the guaranteed adoption volume providing there is a net benefit to doing so? If so, does DCC need to be provided with additional obligations and incentives to encourage DCC to actively pursue such contracts and what factors should DCC take into account in making its assessments? Should we specifically provide for suppliers to compensate directly DCC for any costs incurred by DCC or its service providers in the adoption of additional contracts?</b>
	We have no comment to make.
91.	<b>What in your view is the most appropriate option for allocating the guaranteed adoption volume across energy suppliers and on the mechanism, including timing and frequency, by which any allocation unused by one supplier should be redistributed to other suppliers?</b>
	We have no comment to make.
92.	<b>Do you have views as to when Foundation Stage communication contracts should be adopted?</b>
	We have no comment to make.
<b>Chapter 9: Competitive licence application process</b>	
93.	<b>Do you agree that a four stage process as outlined in paragraph 9.10 is appropriate for appointment of DCC?</b>
	We have no comment to make.
94.	<b>Do you consider that applicants should commit to lodge a form of financial security at the invitation to apply stage that would take effect if the licence was granted to the applicant?</b>
	We have no comment to make.
95.	<b>Do you agree with the proposals for dealing with changes to consortia including allowing changes up to but not beyond submission of responses to the ITA?</b>
	We have no comment to make.
96.	<b>Do you agree with the proposal for one overarching confidentiality agreement for each applicant group rather than individual confidentiality agreements for each member of an applicant group?</b>
	We have no comment to make.
97.	<b>Do you have any comments on the approach to clarifications and dialogue with prospective applicants?</b>
	We have no comment to make.
98.	<b>Do you agree with the proposed approach to the pre-qualification stage including the timescale, the information required and the assessment methodology and criteria?</b>
	We have no comment to make.
99.	<b>Do you have any comment on the documentation to be provided by applicants for the DCC licence? Is there any other information that you think should be made available to applicants?</b>
	We have no comment to make.



<b>100.</b>	<b>Do you agree with the proposed approach to the Invitation to Apply stage including the timescales, the assessment criteria and their weightings?</b>
	We have no comment to make.
<b>101.</b>	<b>Do you agree with the proposals for appointing one or more preferred applicants as well as one or more reserve applicants to ensure that there are alternatives in the event that a preferred applicant withdraws or is disqualified?</b>
	We have no comment to make.
<b>102.</b>	<b>Do you agree with the proposal for an optional best and final offer stage in the event that two or more applicants have similar positions?</b>
	We have no comment to make.
<b>103.</b>	<b>Are there any other specific issues that you think should be considered before grant of the licence?</b>
	We have no comment to make.
<b>104.</b>	<b>Do you agree that in the event of DCC losing its licence the Authority should have the power to fast track the appointment of a temporary DCC? If so, is eighteen months an appropriate maximum time period for the temporary DCC to hold a licence before a new DCC can be appointed via a full competitive process? Which elements of the licence application process could be accelerated or eliminated to ensure rapid appointment of a temporary DCC?</b>
	We agree that this seems sensible.

Table 6.2 - Smart grid message flows having a high impact on WAN requirements

Comments from Energy Networks Association

ENA Use Cases are defined in: ENA Smart Metering System Use Cases, Engage Consulting Limited, April 2010  
Document Ref: ENA-CR007-002 -1.1

Consultation Document																
Ref	Message Flow	Description	Issue / Comments													
T6.2.1	<b>Electricity Quality Read (Programmed)</b>  <b>Required by:</b> Day 1 (2014)  <b>Service Users:</b> Distribution Network Operators	Periodically requested of a sample of the electricity meters by the DNOs, this flow comprises a single electricity quality reading performed received at 30 minute intervals.	1 This requirement is for a upload of data from the start, mid point and end of an LV feeder in close to real time for Active Network Management Purposes 2 4 quadrant power flow & rms voltage data. 3 ENA Use Case 07, 10, 11 4 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis 5 Review message size													
		<table><tr><td></td><td><b>Minimum Core Service Requirements</b></td></tr><tr><td><b>Message Size</b></td><td>300 bytes</td></tr><tr><td><b>Frequency</b></td><td>48 per day - upto</td></tr><tr><td><b>Response Time</b></td><td>300 seconds</td></tr><tr><td><b>Coverage (% meters)</b></td><td>10%</td></tr><tr><td><b>DNO revised frequency</b></td><td>up to 48 per day post 2019 but likely to be lower in 2014-19</td></tr><tr><td><b>DNO revised response time</b></td><td>300 seconds</td></tr><tr><td><b>DNO revised coverage</b></td><td>2014-19: &lt;1%, post 2019: 1-5%</td></tr></table>  For the Core requirement it is assumed that voltage quality can be monitored from a minimum of three measurement points per substation.			<b>Minimum Core Service Requirements</b>	<b>Message Size</b>	300 bytes	<b>Frequency</b>	48 per day - upto	<b>Response Time</b>	300 seconds	<b>Coverage (% meters)</b>	10%	<b>DNO revised frequency</b>	up to 48 per day post 2019 but likely to be lower in 2014-19	<b>DNO revised response time</b>
	<b>Minimum Core Service Requirements</b>															
<b>Message Size</b>	300 bytes															
<b>Frequency</b>	48 per day - upto															
<b>Response Time</b>	300 seconds															
<b>Coverage (% meters)</b>	10%															
<b>DNO revised frequency</b>	up to 48 per day post 2019 but likely to be lower in 2014-19															
<b>DNO revised response time</b>	300 seconds															
<b>DNO revised coverage</b>	2014-19: <1%, post 2019: 1-5%															
T6.2.2	<b>Electricity Quality Read (Programmed)</b>  <b>Required by:</b> Day 1 (2014)  <b>Service Users:</b> Distribution Network Operators	Periodically requested of all electricity meters by the DNOs for planning purposes. This flow comprises a half-hourly reads over a three month period.	1 This requirement is for a upload of data from power quality data from Smart Meters for Network Planning Purposes 2 4 quadrant power flow & rms voltage data. 3 ENA Use Case 01, 02, 03 4 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis 5 Review message size   Note There should b e flexibility in the in interptrettaion of this requirement e.g. 1) in the initial years the % coverage may be higher given that the installed meter volumes will be low, 2) 10% of the four quarterly data down load may be considered to be equivalent to, say one of the four quarterly data down load from 40% of the smart meter population													
		<table><tr><td></td><td><b>Minimum Core Service Requirements</b></td></tr><tr><td><b>Message Size</b></td><td>141,472 bytes</td></tr><tr><td><b>Frequency</b></td><td>4 per year</td></tr><tr><td><b>Response Time</b></td><td>12 hours</td></tr><tr><td><b>Coverage (% meters)</b></td><td>10%</td></tr><tr><td><b>DNO revised frequency</b></td><td>4 times per year</td></tr><tr><td><b>DNO revised response time</b></td><td>12 hours</td></tr><tr><td><b>DNO revised coverage</b></td><td>2014-19: 1-5%, post 2019: 5-10%</td></tr></table>			<b>Minimum Core Service Requirements</b>	<b>Message Size</b>	141,472 bytes	<b>Frequency</b>	4 per year	<b>Response Time</b>	12 hours	<b>Coverage (% meters)</b>	10%	<b>DNO revised frequency</b>	4 times per year	<b>DNO revised response time</b>
	<b>Minimum Core Service Requirements</b>															
<b>Message Size</b>	141,472 bytes															
<b>Frequency</b>	4 per year															
<b>Response Time</b>	12 hours															
<b>Coverage (% meters)</b>	10%															
<b>DNO revised frequency</b>	4 times per year															
<b>DNO revised response time</b>	12 hours															
<b>DNO revised coverage</b>	2014-19: 1-5%, post 2019: 5-10%															
T6.2.3	<b>SMETS ES12.3&amp;4 Load Limiting - Energy Consumption / MD Threshold</b>  <b>Required by:</b> After 2019  <b>Service Users:</b> Distribution Network Operators	To allow, for example, for operation of the supply switch in the event that pre-determined voltage load is exceeded.	1 This requirement is for switching rather than data collection. 2 ENA Use Case 08, 09 3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis													
		<table><tr><td></td><td><b>Minimum Core Service Requirements</b></td></tr><tr><td><b>Message Size</b></td><td>160 bytes</td></tr><tr><td><b>Frequency</b></td><td>4 per day</td></tr><tr><td><b>Response Time</b></td><td>600 seconds</td></tr><tr><td><b>Coverage (% meters)</b></td><td>100%</td></tr><tr><td><b>DNO revised frequency</b></td><td>2 per day</td></tr><tr><td><b>DNO revised response time</b></td><td>600 seconds</td></tr><tr><td><b>DNO revised coverage</b></td><td>5%</td></tr></table>			<b>Minimum Core Service Requirements</b>	<b>Message Size</b>	160 bytes	<b>Frequency</b>	4 per day	<b>Response Time</b>	600 seconds	<b>Coverage (% meters)</b>	100%	<b>DNO revised frequency</b>	2 per day	<b>DNO revised response time</b>
	<b>Minimum Core Service Requirements</b>															
<b>Message Size</b>	160 bytes															
<b>Frequency</b>	4 per day															
<b>Response Time</b>	600 seconds															
<b>Coverage (% meters)</b>	100%															
<b>DNO revised frequency</b>	2 per day															
<b>DNO revised response time</b>	600 seconds															
<b>DNO revised coverage</b>	5%															

T6.2.4	<div><div><div><div>SMTS ES13 Aux switch #1 operation e.g. electric heating</div></div><div><div>Required by: Day 1 (2014)</div><div>Service Users: Distribution Network Operators</div></div></div><div><div><div>Minimum Core Service Requirements</div><div>160 bytes</div><div>4 per day</div><div>600 seconds</div><div>20%</div></div><div><div>DNO revised frequency</div><div>2014-19: 4 per year, post 2019: up to 4 per day</div></div><div><div>DNO revised response time</div><div>600 seconds</div></div><div><div>DNO revised coverage</div><div>20%</div></div></div></div> <div><div>Message flow to support auxiliary switching and load control messages from Network Operators (central heating).</div></div>	<div><div>1 This requirement is for switching rather than data collection.</div><div>2 ENA Use Case 08, 09</div><div>3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis</div><div>4 Clarification required whether each message is for an on and off signal, or a single message only constitutes on or off DNO view that this is for Economy 7 like tariffs which will be predominantly managed by suppliers at least in the short term . Supplier should be specifying this if it is to be used</div><div>5 to dynamically control electric heating under E7 Requirements shown is only for when the DNO requires to take action to change demand due to system issue. Post 2019 this could form part of an Active Network</div><div>6 Management toolkit managed by Network Operators</div></div>
T6.2.5	<div><div><div><div>SMTS ES13 Aux switch #2 operation e.g. water heating</div></div><div><div>Required by: Day 1 (2014)</div><div>Service Users: Distribution Network Operators</div></div></div><div><div><div>Minimum Core Service Requirements</div><div>160 bytes</div><div>4 per day</div><div>600 seconds</div><div>20%</div></div><div><div>DNO revised frequency</div><div>4 per year</div></div><div><div>DNO revised response time</div><div>600 seconds</div></div><div><div>DNO revised coverage</div><div>20%</div></div></div></div> <div><div>Message flow to support auxiliary switching and load control messages from Network Operators (water heating).</div></div>	<div><div>1 This requirement is for switching rather than data collection.</div><div>2 ENA Use Case 08, 09</div><div>3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis</div><div>4 Clarification required whether each message is for an on and off signal, or a single message only constitutes on or off DNO view that this is for Economy 7 like tariffs which will be predominantly managed by suppliers at least in the short term . Supplier should be specifying this if it is to be used</div><div>5 to dynamically control electric heating under E7 Requirements shown is only for when the DNO requires to take action to change demand due to system issue. Post 2019 this could form part of an Active Network</div><div>6 Management toolkit managed by Network Operators</div></div>
T6.2.6	<div><div><div><div>SMTS ES13 Aux switch #3 operation e.g. EV Charging</div></div><div><div>Required by: After 2019</div><div>Service Users: Distribution Network Operators</div></div></div><div><div><div>Minimum Core Service Requirements</div><div>160 bytes</div><div>4 per day</div><div>600 seconds</div><div>5%</div></div><div><div>DNO revised frequency</div><div>4 per day post 2019</div></div><div><div>DNO revised response time</div><div>600 seconds</div></div><div><div>DNO revised coverage</div><div>5%</div></div></div></div> <div><div>Message flow to support auxiliary switching and load control messages from Network Operators (electric vehicle charging).</div></div>	<div><div>1 This requirement is for switching rather than data collection.</div><div>2 ENA Use Case 08, 09</div><div>3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis</div><div>4 Clarification required whether each message is for an on and off signal, or a single message only constitutes on or off</div><div>5 DNO view that EV charging tariffs will need to be developed by Suppliers and could well require DNO input to avoid overloading networks. Requirements shown is only for when the DNO requires to take action to change demand due to system issue. Post 2019 this could form part of an Active Network</div><div>6 Management toolkit managed by Network Operators</div></div>

T6.2.7	<div><div><div>SMTS ES13 Aux switch #4 operation e.g. Heat Pump</div><div>Required by: After 2019</div><div>Service Users: Distribution Network Operators</div></div><div><div>Minimum Core Service Requirements</div><div><div>Message Size</div><div>Frequency</div><div>Response Time</div><div>Coverage (% meters)</div><div>DNO revised frequency</div><div>DNO revised response time</div><div>DNO revised coverage</div><div>160 bytes</div><div>4 per day</div><div>600 seconds</div><div>5%</div><div>4 per day post 2019</div><div>600 seconds</div><div>5%</div></div></div></div>	<div>1 This requirement is for switching rather than data collection.</div> <div>2 ENA Use Case 08, 09</div> <div>3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis</div> <div>4 Clarification required whether each message is for an on and off signal, or a single message only constitutes on or off</div> <div>DNO view that this is for Economy 7 like tariffs which will be predominantly managed by suppliers at least in the short term . Supplier should be specifying this if it is to be used</div> <div>5 to dynamically control electric heating under E7</div> <div>Requirements shown is only for when the DNO requires to take action to change demand due to system issue. Post 2019 this could form part of an Active Network</div> <div>6 Management toolkit managed by Network Operators</div>
T6.2.8	<div><div><div>SMTS ES13 Aux switch #5 Microgeneration curtail / dispatch</div><div>Required by: After 2019</div><div>Service Users: Distribution Network Operators</div></div><div><div>Minimum Core Service Requirements</div><div><div>Message Size</div><div>Frequency</div><div>Response Time</div><div>Coverage (% meters)</div><div>DNO revised frequency</div><div>DNO revised response time</div><div>DNO revised coverage</div><div>160 bytes</div><div>4 per day</div><div>600 seconds</div><div>20%</div><div>4 per day post 2019</div><div>600 seconds</div><div>1-2%</div></div></div></div>	<div>1 This requirement is for switching rather than data collection.</div> <div>2 ENA Use Case 08, 09</div> <div>3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis</div> <div>4 Clarification required whether each message is for an on and off signal, or a single message only constitutes on or off</div> <div>5 Requirements show is only for when the DNO requires to take action to change export due to system issue</div>
T6.2.9	<div><div><div>Real-time rewards/penalties information</div><div>Required by: After 2019</div><div>Service Users: Distribution Network Operators</div></div><div><div>Minimum Core Service Requirements</div><div><div>Message Size</div><div>Frequency</div><div>Response Time</div><div>Coverage (% meters)</div><div>500 bytes</div><div>2 per day</div><div>600 seconds</div><div>20%</div></div></div></div>	<div>Remove - function not specified by ENA - duplication with T6.2.8?</div>

Table 6.3 - Core Service Requirements (with low / moderate potential impact on WAN cost/performance)

Comments by Energy Networks Association

ENA Use Cases are defined in: ENA Smart Metering System Use Cases, Engage Consulting Limited, April 2010  
Document Ref: ENA-CR007-002 -1.1

Additional items that are included in the Augusr IDTS, but not captured in this table, are shown in red

Consultation Document								
Ref	Message Flow	Coverage (% meters)	Message Size (bytes)	Response Time (seconds)	Frequency (per year)	Users	Required by	Issue / Comments
T6.3.1	Electricity Quality Read (on demand)  <i>DNO revision</i>	10%  <i>2014-19: &lt;1%, post 2019: 1-5%</i>	300	30  <i>60 seconds</i>	12	DNO	Day 1 (2014)	1 2 3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis 4 quadrant power flow & rms voltage data. ENA Use Case 07, 11
T6.3.2	Electricity Quality Read (DG)  <i>DNO revision</i>	1  <i>Functionality not required - see comments</i>	300	300	17520	DNO	Day 1 (2014)	1 2 3 5 This data set is not included in the IDTS If this relates to planning data it would be collected as part of T6.2.2.
T6.3.3	Smart Grid - localised weather forecast reports  <i>DNO revision</i>	20  <i>Functionality not required - requested by IET</i>	1024	600	1460	DNO	After 2019	1 2 This requirement was raised by the IET and it is not clear what functionality this is intended to deliver.
T6.3.4	Smart Grid - Over / under voltage alarm  <i>DNO revision</i>	100  <i>1-2%</i>	160	30  <i>600</i>	50	DNO	Day 1 (2014)	1 2 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis ENA Use Case 19
T6.3.5	Smart Grid -Re synchronisation of 'islands'  <i>DNO revision</i>	10  <i>Functionality not required - requested by IET</i>	160	30	12	DNO	After 2019	1 This requirement was raised by the IET and it is not clear what functionality this is intended to deliver.
T6.3.6	Smart Grid -Small-scale generation management  <i>DNO revision</i>	10  <i>Functionality not required - requested by IET</i>	160	30	1825	DNO	Day 1 (2014)	1 2 This requirement was raised by the IET and it is not clear what functionality this is intended to devover. further explanation Duplication of T6.2.8
T6.3.7	Smart Grid -V2G support (bids)  <i>DNO revision</i>	50  <i>Functionality not required - requested by IET</i>	160	30	2190	DNO	After 2019	1 This requirement was raised by the IET and it is not clear what functionality this is intended to deliver.
T6.3.8	13-month meter read upload	34	152,224	3600	1	N/A	Day 1 (2014)	Not DNO requirement
T6.3.9	Supply fault alarm triggered  <i>DNO revision</i>	100  <i>100</i>	160  <i>160</i>	600  <i>600</i>	50  <i>2</i>	N/A	Day 1 (2014)	1 2 3 User is DNO Issue relates to the management of the high volume of alarms in a short space of time in a small geographic area ENA Use Case 14
T6.3.10	Credit balance update					Supplier		Supplier Requirement

T6.3.11	Read distributed generation data	Other						Supplier Requirement
T6.3.12	IHD, meter or communications unit s/w upgrade	Supplier						Supplier Requirement
T6.3.13	Battery Status	Supplier						Supplier Requirement
T6.3.14	Consumer meter Interaction	Supplier						Supplier Requirement
T6.3.15	Diagnostics (low priority)	Supplier						Supplier Requirement
T6.3.16	Diagnostics (routine)	Supplier						Supplier Requirement
T6.3.17	Download / clear data from meter (on demand)	Supplier						Supplier Requirement
T6.3.18	Download / clear data from meter (scheduled demand)	Supplier						Supplier Requirement
T6.3.19	Energisation status check	100	160	120	1	Supplier	Day 1 (2014)	<ol style="list-style-type: none"> <li>1 Also required by DNO</li> <li>2 ENA Use Case 13</li> <li>3 Same requirements as supply fault alarm to check customer supply is restored. Also provides an alternative to supply fault alarm if it is decided that this is too expensive</li> </ol>
	<i>DNO revision</i>	100	160	120	2	DNO	Day 1 (2014)	
T6.3.20	Feed in Tariff update on demand (on demand)	Supplier						Supplier Requirement
T6.3.21	Feed in Tariff update on demand (scheduled)	Supplier						Supplier Requirement
T6.3.22	Gas Calorific value update (on demand)	Supplier						Supplier Requirement
T6.3.23	Gas Calorific value update (scheduled)	Supplier						Supplier Requirement
T6.3.24	Leak alarm	Supplier						Supplier Requirement
T6.3.25	Leakage performance report	Supplier						Supplier Requirement
T6.3.26	Maximum Demand Read	100	160	10800	12	Supplier	2014	<ol style="list-style-type: none"> <li>1 Also required by DNO - IDTS PC08 Part 3 Draft Max /min demand readings consulted upon as</li> <li>2 part of IDTS Requirements in PC08 Part 3: Import min/max in two periods, Export min/max in</li> <li>3 two periods ENA requirements are planning timescales ie 12 hour response</li> <li>4 Review data size</li> <li>5</li> </ol>
	<i>DNO revision</i>	50		10800	12	DNO	2014	
T6.3.27	Message to consumer via IHD (on demand)	100	256	120	12	Supplier/DNO		<ol style="list-style-type: none"> <li>1 May also required by DNO</li> <li>2 ENA Use Case 12</li> <li>3 Longer response time would be acceptable to DNO (hours)</li> </ol>
T6.3.28	Message to consumer via IHD (scheduled)	100	256	600	52	Supplier/DNO		<ol style="list-style-type: none"> <li>1 May also required by DNO</li> <li>2 ENA Use Case 12</li> <li>3 Longer response time would be acceptable to DNO (hours)</li> </ol>
T6.3.29	Meter fault alarm triggered	Supplier						Supplier Requirement

T6.3.30	New device added to SMHAN					Supplier			Supplier Requirement
T6.3.31	PAYG: Remote Top up Payment					Supplier			Supplier Requirement
T6.3.32	PAYG: Remote balance Adjustment (ex gratia payment)					Supplier			Supplier Requirement
T6.3.33	PAYG: Remote config non disc periods					Supplier			Supplier Requirement
T6.3.34	PAYG: Remote config non disc periods					Supplier			Supplier Requirement
T6.3.35	PAYG: Remote config of debt settingss					Supplier			Supplier Requirement
T6.3.36	PAYG: Remote config of debt settings					Supplier			Supplier Requirement
T6.3.37	PAYG: local credit top up applied at meter					Supplier			Supplier Requirement
T6.3.38	Query devices on HAN					Supplier			Supplier Requirement
T6.3.39	Remote configuration of settings (on demand)	100	1,100	120	4	Supplier			1 Also required by DNOs 2 ENA Use Case 20 3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis
	DNO revision	10		900	4	DNO	2014		
T6.3.40	Remote configuration of settings (scheduled)	100	1,100	600	36	Supplier			1 Also required by DNOs 2 ENA Use Case 20 3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis 4 DNO message size TBC but unlikely to be more than supplier requirements
	DNO revision	10		43200	12	DNO	2014		
T6.3.41	Remote dis/enablement of supply (scheduled)	100	160	600	1	Supplier	2014		1 Also required by DNOs 2 ENA Use Case 09 3 Functionality required in all SMs but only the percentage shown will be accessed on a regular basis 4 Application during the restoration of faults as an example - see ENA use case
	DNO revision	10%	160	600	1	DNO	2014		
T6.3.42	Security or software patch					Supplier			Supplier Requirement
T6.3.43	Self registration on installation					Supplier			Supplier Requirement
T6.3.44	Switch between credit and PAYG (on demand)					Supplier			Supplier Requirement
T6.3.45	Switch between credit and PAYG (scheduled)					Supplier			Supplier Requirement
T6.3.46	Tamper alarm triggered (and reset)					Supplier			Supplier Requirement
T6.3.47	Tariff update (on demand)					Supplier			Supplier Requirement
T6.3.48	Tariff update (scheduled)					Supplier			Supplier Requirement

T6.3.49	Smart Grid - Over / under voltage - returned to normal limits	1-2%	160	600	50	DNO	Day 1 (2014)	1 2 3 4	Not included in table 6.3 but previously specified Functionality required in all SMs but only the percentage shown will be accessed on a regular basis ENA Use Case 19 Indicates that the Elec Meter has detected that voltage levels have returned to a level within the configurable thresholds
T6.3.50	Incoming Supply Failure Restored	100	160	600	2	DNO	Day 1 (2014)	1 2	Not included in table 6.3 but previously specified ENA Use Case 15 Indicates that the Elec Meter has detected that the Incoming Supply has been Restored following an Incoming Supply Failure
T6.3.51	Voltage sag / swell detected	1-2%	160	43200	50	DNO	Day 1 (2014)	1 2	Not included in table 6.3 but previously specified ENA Use Case 06 Planning data
T6.3.52	Supply Disabled	10	160	600	1	DNO	Day 1 (2014)	1 2 3	ENA Use Case 09 Alarm / Event associated with T6.3.41 to confirm that outage is due to disablement and not fault Indicates that the supply has been restored i.e the contactor is opened
T6.3.53	Supply Restored	10	160	600	1	DNO	Day 1 (2014)	1 2 3	ENA Use Case 09 Alarm / Event associated with T6.3.41 Indicates that the supply has been restored i.e the contactor is closed
T6.3.54	Network Max Demand in a 30min period exceeds threshold	5	160	600	12	DNO	After 2019	1 2 3	ENA Use Case 09 Alarm / Event Indicates that the Elec Meter has detected a threshold set by Networks has been exceeded - this could lead to the supply being disabled.
T6.3.55	Network Energy Limiting Threwhold kWh over a definable period exceeded	5	160	600	12	DNO	After 2019	1 2 3	ENA Use Case 09 Alarm / Event The kWh consumption over a definable period has exceeded the threshold set
T6.3.56	Energy and Consumption returned to below Threshold limits	5	160	600	12	DNO	After 2019	1 2 3	ENA Use Case 09 Alarm / Event Indicates that the Max Demands / Consumption measured by the Elec Meter has reduced to a level below the threshold