



**WALES&WEST  
UTILITIES**

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### **Consultation on the Smart Energy code April 2012**

Wales & West Utilities (WWU) is a licensed Gas Distribution Network (GDN) providing Gas Transportation services for all major shippers in the UK. We cover 1/6<sup>th</sup> of the UK land mass and deliver to over 2.4 million supply points. WWU is the only company that focuses solely on Gas Distribution in Great Britain.

WWU recognise that the move to a SEC is a significant exercise requiring a host of different practical and organisational issues to be captured and addressed. We trust our thoughts below assist in the ongoing development of this area of work

### **PARTICIPATION IN THE SEC**

#### **Q1 Please provide any comments that you have on the classification of party categories under the SEC.**

The six categories (inc Gas transporter) are viewed as the appropriate category of parties under the Smart Energy Code (SEC).

It is key that consideration is given to the role that these parties are anticipated to deliver as SEC signatories. While gas transporters can opt to take services from the DCC, (an elective proposition), we also understand that gas transporters will be mandated to provide some data items to set up and maintain the access control filter, (an obligated proposition).

We may of course elect to take services from the DCC, however having an obligation to provide data is effectively mandated service provision to the DCC. With such an obligation, gas transporters will require certainty as to what funding arrangements are to operate to deliver such obligations. The data sets referred to, may be held and managed by Xoserve. Any licence / SEC obligations will have to lie with the gas transporter though, because Xoserve cannot be mandated by licence.

Consideration must be given as to how these costs can be met through the regulatory funding mechanisms available, as they have not been built into RIIO-GD1. The SEC / Licence modification analysis would therefore be best placed to advance this issue.

## INVOLVEMENT OF THE METER SERVICES COMMUNITY

**Q3 Do you support the Government's preferred solution to implement a simple variant of Option b whereby the registration of the a meter operator in the existing electricity and gas registration systems would be deem to constitute a nomination by the supplier of that meter operator to act as its agent to perform a specific set of commands?**

In principle WWU supports this solution, however we believe there is merit in reconsidering the current proposals which do not allow the meter owner (Meter Asset Provider MAP) to be separately identified and that it does not allow the MAP rights of access to the database.

**Q4 Should meter operators be given limited participation rights in SEC governance under Options B and C and if so what rights are appropriate?**

We are aware that the interests of Meter Operators and perhaps more particularly Meter Asset Providers are not necessarily aligned to the interests of suppliers particularly where there is some disagreement over the ownership or location of meters. WWU notes concerns over compromising the supplier hub principle. We also note that Meter Operators and Meter Asset Providers, unlike suppliers are not licensed and therefore we do have concerns about them being given equal governance rights to other SEC members.

It is logical only to give governance rights where the party contributes to the funding of the organisation and since under Option B these parties will not fund the SEC it seems logical that they should not have governance rights; however some form of non-voting observer status may be appropriate and suppliers should perhaps have an obligation to take the requirements of Meter Operators and Meter Asset Providers into account.

**Q5 Would you support the tracking of assets being included within the future system requirements for the new registration systems, which are proposed to be provided by the DCC**

We can understand why Meter Operators and Meter Asset Providers would wish to have tracking included. Tracking could mean:-

- Tracking meters that are on the wall somewhere.
- Tracking meters over their whole life including when they have been removed and are in store or being refurbished and where they are in this process.

While the first may be in scope, the second is not and should be managed by the Meter Operator and/or Meter Asset Provider.

Since the Meter Operators and Meter Asset Providers will benefit from this functionality they should be the parties that fund its development and operation, though we realise that this raises issues if Option B is adopted.

We note that Meter Operators wish to ensure that they can use their hand held devices to interrogate meters. WWU is equally concerned that we can use our systems to interact with smart meters in the course of our day to day operations. This can include emergencies where we may need to change meters and download data from smart meters in prepayment mode under our Post Emergency Metering Services as well as when we perform customer requested service alterations to re-locate meters and when we replace metallic mains and services that can in some cases result in the need to move meters. In all these cases having to call out the



supplier to re-activate the meters or download information will greatly inconvenience customers as well as add cost.

#### **ACCESSION TO THE SEC**

##### **Q6. Do you agree with the process proposed for accession and the accession time limit?**

The proposed six month timeframe requiring organisations to take a DCC service prior to potential expulsion from SEC (if they do not) seems short given that organisations may require additional lead time to fully consider their requirements.

#### **ESTABLISHING READINESS TO RECEIVE THE DCC's COMMUNICATION SERVICES**

**Q9 Do you consider that Government should not mandate a specific solution for the DCC User Gateway and that the Data Service Provider (DSP) bidders should be invited to propose the solution which they consider to be the most effective (such proposals could include the option of extending an existing industry network)?**

DSP bidders should be encouraged to propose solutions that satisfy the DCC requirements

#### **ENROLLING SMART METERING SYSTEMS**

**13 Do you agree that the SEC should require, as a condition of enrolment, that the supplier grants the right to the DCC to access its smart metering system for specified purposes?**

Network Operators will need the surety that any smart metering system is linked and enrolled onto the DCC. Providing the purposes for DCC's access are specified we believe it is appropriate that DCC should be able to access suppliers smart metering systems.

It is important to remember that for gas only meters complying with Smart Metering Equipment Technical Specification 2 (SMETS2) will have to be enrolled with the DCC. There will therefore be a population of meters comprising:-

- Non smart meters (these will decline but probably not to zero as we do not believe that all non smart meters in the target population will be replaced)
- Advanced Domestic Meters (pre SMETS1 meters)
- SMETS1 compliant meters

that will not be enrolled in the DCC.

While we accept that this is known by parties it is important, when considering the responses that even after the end of rollout the DCC will not hold the entirety of the meters in the target rollout groups (U6 meters only for gas) and that all the other meters will be held in the legacy systems.

#### **DCC CHARGES**

##### **Q24 Do you think that the proposed approach for DCC charging is reasonable?**

We acknowledge the charging principles set out but require more detail before confirming our view. The proposed volume charge refers to the volumes of services received, dictated by the

