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Smart Metering Implementation Programme
Regulation Team
Department of Energy and Climate Change
3 Whitehall Place
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Dear Sirs

**Smart Metering Implementation Programme:
Consultation on Smart Energy Code Draft Legal Text**

Thank you for the opportunity to respond to the Smart Metering Implementation Programme ("SMIP") consultation in respect of the Smart Energy Code Draft Legal Text. We have set out below the key points of our response, and the Appendix to this letter provides detailed responses to specific questions as set out in the consultation document.

Xoserve is not an entity regulated by Licence, nor is it a signatory to any GB energy industry Codes. We have, however, been appointed by the principal Gas Transporters ("the GTs") as their common Agent ("the GT Agent"), responsible for discharging the GTs' Licence and Uniform Network Code ("UNC") obligations in respect of transportation transactional services, defined collectively as "Transporter Agency Services" in the GTs' UNC.

Summary

Our response is concerned with the proposed obligations on Parties to the Smart Energy Code ("SEC") to provide registration information to the DCC. We are satisfied that the relevant draft SEC provisions reflect the outcome of detailed discussions that have taken place in the various SMIP Working Groups in which we have participated and, in respect of obligations on the GTs to provide registration data, are generally consistent with the proposed changes to the UNC that will create the necessary GT permissions. Minor exceptions and mismatches are noted in our detailed response.

**SMART METERING IMPLEMENTATION PROGRAMME
CONSULTATION ON SMART ENERGY CODE DRAFT LEGAL TEXT**

APPENDIX: DETAILED RESPONSES TO QUESTIONS

Question 12: Do you agree that the proposed legal drafting for the SEC covering obligations on SEC Parties to pass registration information to the DCC is appropriate? Please provide a rationale for your views.

Context

Xoserve's prevailing responsibilities in its capacity as the GT Agent include the provision of services that discharge GT obligations as set out in Condition 31 of the GT Licence. Services include the maintenance of the GT Supply Point Register that records a number of data attributes for each Supply Point, including the identity of the registered Gas Supplier and Gas Shipper at each Supply Point. The identities of both the registered Gas Supplier and the registered Gas Shipper are updated as part of the Supplier switching process, and Xoserve facilitates this process through the provision of Supply Point information to both the incumbent and proposing Gas Supplier.

In this capacity, Xoserve holds a number of the gas industry "Registration Data" items that will be required by the DCC to perform the services and activities as set out in Section E1.2 of the draft Smart Energy Code ("SEC").

For the avoidance of doubt, the scope of registration data held by Xoserve does not extend to that for Supply Points on Networks operated by independent Gas Transporters ("iGTs"). However, Xoserve is working closely with the industry to define requirements for the future introduction of iGT Agency Services.

Obligation on GTs to Provide Registration Data

Xoserve is working closely with both GTs and Gas Shippers in the development of UNC Modification Proposal 430 "Inclusion of data items relevant to smart metering into existing industry systems" ("Mod 430"), which creates the necessary permissions in UNC for the GTs to make registration data available to the DCC and includes a detailed definition of the relevant data items. The majority of these data items are already held on the GT Supply Point Register, although a small number are required to be created as a consequence of the introduction of the GB smart metering market.

We have reviewed the list of proposed data items as set out in SEC E2.2 and have noted that these are consistent with those set out in Mod 430 and the relevant UNC defined terms, with the following exceptions.

Meter Operator

Items (h) and (i) in SEC E2.2 refer to "Meter Operator" ("the MOP"), whereas the Mod 430 documentation refers to "Meter Asset Manager" ("the MAM"). We have also established that "Meter Operator" is not a UNC defined term.

We recognise the MOP and the MAM as separate entities with differing interests and responsibilities. The SMIP Working Groups in which we have participated have consistently identified a requirement to provide information about the MAM rather than the MOP, so we think that the draft SEC should be amended accordingly.

Premises / Consumer Type

Item (m) in SEC E2.2 refers to "Premises / Consumer Type", whereas the corresponding UNC defined term is "Market Sector Code" that is used to identify whether the premises at which a Supply Point is located are "Domestic" or "Non-domestic".

Obligation on Suppliers to Provide Registration Data

We have noted the proposed requirement as set out in SEC E2.4 for Suppliers to provide information about the nature of the premises associated with each MPRN and would make two observations, namely that:

- (a) The proposed requirement on Suppliers would appear to replicate the proposed obligation on GTs to provide information about "Premises / Consumer Type", and would create both an unnecessary regulatory burden on GTs and Suppliers because of the duplicate provision of information and a risk to the robustness of DCC and industry processes in the event that the data received from different sources does not match; and
- (b) Gas Shippers are already obligated under the GTs' UNC to provide Market Sector Code data to the GTs.

Obligation on DCC to provide Data

We have reviewed the proposed requirement as set out in SEC E2.6 for the DCC to provide information to the GTs about the existence of a Smart Metering System at each MPRN, and consider this to be consistent with the relevant information set out in Mod 430.

Variations

We have reviewed the proposed variations with regard to the provision of registration data as set out in SEC Section L1.4. We understand that the impact of these variations would be to limit the scope of registration data that is required to be made available with effect from the SEC commencement date until such time as the DCC takes on obligations for the provision of Energy Registration Services as set out in Condition 15 of the draft DCC Licence.

We are satisfied that these variations reflect the reduced scope of requirements for data provision as agreed by the relevant Smart Metering Working Group.

Next Steps

We have already participated extensively in a number of Smart Metering Working Groups, and are keen to continue to support the SMIP going forward, particularly as we move towards detailed analysis and subsequent development of essential changes to gas industry central systems to enable both Foundation and Day 1 solutions. We would be happy to meet with members of the DECC Smart Metering Team to discuss in more depth any of the matters raised in our response.

We are happy for you to publish this letter and the supporting Appendix. If you would like to discuss further any aspect of our response, please contact
or

Yours faithfully