



## ***Response to Consultation – Second version of Smart Metering Technical Specification***

### ***General Comments***

We are very supportive of most of the proposals and pleased to see progress that has been made so far which is necessary to enable completion of roll out of smart meters by 2019. We see this as the next step of an evolving specification that will, overtime have a number of iterations as customer requirements are better understood and technology advances facilitate delivery resulting in v3, v4, v5 for the meter specification. We are particularly pleased that the consultation goes a long way to provide greater certainty over early investment and enables scale up of activity in preparation for Data Communication Company (DCC) go live.

We are concerned that recent uncertainty over security system architecture may radically change the landscape in which we have responded to this consultation. We expect that a pragmatic solution to the issues will be found that balances the needs of system security versus rollout timescales and delivery of the central business case assumptions. This issue has highlighted a really essential requirement that a firm baseline position is provided for industry to work from in order that we can move forward with no areas of ambiguity.

We welcome the pragmatic solution for Home Area Network (HAN). This enables roll out to commence and also encourages introduction of a wireless HAN solution that will enable greater installation efficiency, which suppliers have natural incentive to drive for early implementation. It is also important that a wired solution is determined early to enable rollout to all customers allowing the maximum possible operational efficiencies within a supplier led model. It is vital that interoperability is supported and this is best delivered by dual-band communication hubs. It should be expected that the additional unit costs should reduce if this approach is mandated.

The proposal that the communications hub is owned by the Communication Service Provider (CSP) is welcomed as it provides end to end certainty over delivery of Wide Area Network (WAN) communication links. We are concerned however that this decision does not mean that suppliers should be responsible for all costs of maintaining and or replacing/upgrading the communication hubs. For example decisions to replace communications hubs may be made as a result of innovation by the CSP (a technology refresh) or required as a result of faulty equipment neither of which are the fault of the energy supplier. It is therefore not appropriate for all costs to "lie where they fall" as suppliers do not have overall control in this area.

We view an intimate communications hub solution as an essential element of the smart metering solutions available for suppliers to install. Our experience of installing with an intimate solution has resulted in far less aborted jobs (due to space constraints at the meter position) and improved connectivity (effectively a plc connection between the comms hub and the electricity meter).



We are not clear how this is going to be taken forward with the SMIP and urge government to resolve this uncertainty and ensure any necessary approvals from Europe are granted quickly. We would also expect that the specification for the intimate solution would be duplicated by the stand alone solution with the power source attachments included.

The assurance regime is sensible and provides necessary confidence in equipment which may be inherited following change of supplier.

We are supportive of the majority of the governance arrangements and encourage that security governance should extend to operational arrangements that enable immediate response to security incidents where required.

We also have concerns over the suggestion that suppliers should be responsible through Licence conditions for establishment of communications links for both WAN and HAN. It is not clear at this stage that both the WAN (DCC responsible for delivery) and HAN services will be available to all customers in all situations. Therefore suppliers would not be in a position to comply with the Licence conditions suggested in the draft.



**Responses to specific questions**  
**Chapter Four - SMETS 2 Development**

**Q1. Do you have any comments on the criteria used in the evaluation of the application layer standards?**

We support the criteria used for evaluation.

**Q2. Do you agree with the proposal to adopt ZigBee SEP / DLMS as the HAN application layer standards for GB?**

Yes. These are pragmatic solutions.

**Q3. Do you agree that equipment should be required to comply with SMETS and a GB Companion specification for ZigBee SEP / DLMS?**

Yes. Industry needs assurance that products being installed can be trusted and are being sourced from trusted organisations in order that the market can function correctly. Compliance is required to deliver interoperability.

**Q4. Do you agree with the overall approach proposed in relation to the HAN physical layer? If not, please provide a rationale and evidence for your position.**

Yes.

**Q5. Do you have any comments on the criteria used in the evaluation of the physical layer of the HAN?**

We consider the approach to HAN trials and the criteria used to be right and welcome the selection of two wireless solutions. We urge government to complete the last area of testing with a swift conclusion on a standard for a wired HAN. We would also like to see a clear timeline set out as to how and when a solution at 868 MHz will be made available for suppliers. Having a working HAN solution in all premises where smart metering will be installed is absolutely essential to the success of the rollout.

**Q6. What are your views on the compatibility of the reserved spectrum 870-876MHz with 868 MHz and the value of considering the use of this band?**

We agree it is sensible to include a reserved bandwidth capability to avoid risks of interference with spectrum. If the technical experts have identified this as a risk and retention of spectrum does not carry a significant downside, we would encourage government to secure this bandwidth. It is not clear if there would be any costs involved in



securing this spectrum but the longer a decision takes the greater risk the spectrum could be subject to auction which may cause further complication, add cost and delays.

There is also a need to swiftly decide on this issue as despite securing the spectrum there may be long lead times (c.2-3 years?) for products to be tested and made readily available on the market for suppliers to utilise.

**Q7. Do you consider that additional measures should be taken to encourage the development of an 868 MHz solution?**

Yes additional help to encourage development of 868MHz or the 870-876 spectrum, and wired HAN should be provided to ensure we have a solution for 100% of properties in order to ensure a successful rollout and avoid costly aborted visits or incomplete jobs.

We understand that 3-4 manufacturers of chips operating at 868 MHz have already indicated that silicon would be available for this spectrum and that this would be enough for the Zigbee Alliance to commence its certification process. A swift government declaration of intent to utilise these spectrums will also add weight and assist moving forward in this area quickly. A further option is via the DCC contracts that an obligation is placed on the service provider to make available comms hub with 868 MHz solutions as soon as they are available. Suppliers have a natural incentive to urge delivery through meter manufacturers and to utilise these once made available to deliver rollout efficiently.

**Q8. Do you agree with the approach to allow the market to determine the balance between 2.4 GHz and 868 MHz? If not, please provide rationale and evidence.**

Yes. As per our answer to Q7, once the devices are made available, suppliers have a natural incentive to utilise these to deliver rollout efficiencies.

**Q9. Redrafted question emailed by DECC 13.08.12. What are your views on the costs and benefits of the three options identified for deploying wireless solutions (i.e. 2.4 GHz as the default; dual-band communications hubs; or market led)?'**

We consider the dual band communications hub as the most appropriate solution.

The costs of having to abort visits either as a first installing supplier or a second because we are unable to get a HAN solution to work and are unable to connect to the existing HAN, would, far exceed the additional costs to the communication hub. Customer satisfaction with the SMIP would also be severely undermined if a significant percentage of customers cannot have a completed installation at the first visit. In addition we would expect the price assumed for the additional chip to be considerably lower than suggested in view of the level of demand.



**Q10. Do you agree with the proposal for a 'fit for purpose' installation obligation on suppliers?**

No, there is a natural incentive on suppliers to encourage early delivery of an 868 solution to facilitate an efficient rollout. We consider that any obligation should sit on the communication service provider to make the communications hubs available with both frequencies as soon as possible.

**Q11. Do you have any views on the proposed approach to developing a wired HAN solution?**

We believe development of a wired HAN solution is critical to the overall success of the programme. We are very pleased to offer support for a technology trial that would determine a solution for G.B. We would urge government to move quickly in this area such that the outcomes can be understood and decisions made as soon as possible and thereby optimise operational efficiencies in roll-out and enhance customer experience.

**Q12. Do you agree with the proposed scope of functional requirements for a communications hub? Are there any other functions that should be included and what would be your rationale for including those functions (including estimated costs and benefits)?**

Yes. Functionality of the comms hub will need to account for potential multiple HAN solutions and bridging between them. Our preference has always been for an intimate solution. Our experience of installing with an intimate solution has resulted in far less aborted jobs and improved connectivity (effectively a plc connection between the comms hub and the electricity meter). We see significant advantage in specifying a standard size and connection for the hub to support interoperability.

The intimate solution also assists with physical security as this reduces the attack surface of the Comms Hub if fitted inside the meter casing.

**Q13. Do you have views on the specification for an 'intimate' interface between electricity meters and communications hubs?**

An intimate solution would require a standard fit and size for any meter type such that the comms hub could be installed with any electricity smart meter. Our preference has always been for an intimate solution. Our experience of installing with an intimate solution has resulted in far less aborted jobs (due to space constraints at the meter position) and improved connectivity (effectively a plc connection between the comms hub and the electricity meter).

We are not clear how this is going to be taken forward with the SMIP and urge government to resolve this uncertainty and ensure any necessary approvals from Europe are granted quickly. We would also expect that the specification for the intimate solution would be



duplicated by the stand alone solution with the power source attachments included. We also assume that the communication protocols to be used in the intimate solution will be DLMS & Zigbee.

**Q14. Do you agree with the Government's marginal preference for the CSP-led model for communications hub responsibilities, or do you prefer the supplier-led model? Please provide clear rationale for the advantages and risks associated with your preferred option.**

Yes. It would make sense for the Communication Service Provider (CSP) to own the asset. The alternative places a burden and responsibility on suppliers for technology updates where the decision will be taken by CSP and therefore is outside of supplier's control and financial planning. It also provides single end to end responsibility for delivery of wide area communications to the meter point. Uncertainty over responsibility could lead to disputes in fault situations resulting in bad experiences for customers. Energy UK has provided information to demonstrate a business case for CSP ownership. This proposes the following;

- CSP owns the assets and charges an annual rental. The CSP may choose to fund the assets themselves or via a third party e.g. bank.
- An element of the annual CSP rental includes an anticipated installation, maintenance and replacement cost. The CSP or its appointed finance provider charges the DCC the rental as either a separate or part of transactional communication charges. The DCC would likely pass these costs through to suppliers.
- The CSP appoints the suppliers as its installation and maintenance agent and provides the assets to the supplier free of charge.

Such an approach removes any issues over compliant equipment and installation issues where gas and electricity meters are fitted at different times by two suppliers for example if the communication module is owned by the 1<sup>st</sup> supplier there is little incentive on that supplier to fix a problem that is only affecting the second.

**Q15. Do you agree with the proposal that a CHTS-compliant communications hub should not be mandated for opted out non-domestic sites and that suppliers should be free to use whatever type of communications equipment best supports their processes and WAN service?**

It has always been our intention to use the DCC for all our non domestic metering requirements (including profile class 5-8 advanced meters) if technically and economically viable. If this was the standard arrangement for non domestic customers, change of supplier would be much simpler. However we recognise that optionality has been provided by government and non domestic suppliers will be given choice to develop in discussion with customers the most appropriate solution for their needs.

This may mean that for some metering systems, on change of supplier, work maybe required to up-grade the meter to a DCC/SMETS compliant set to enable this to be enrolled into DCC operations and worse case exchanged for a compliant meter. In such circumstances customers should be made fully aware of the implications of the choices made.



**Q16. Do you agree that the gaining supplier should bear the costs of installing an appropriate communications hub if they decide to switch between opted in and opted out?**

Yes. However, whilst we understand rationale to not require an opted out supplier to fit a Communication Hub Technical Specification (CHTS) compliant communication hub, we do not expect these to be removed if one has already been fitted. To continually have communication hubs replaced and additional visits made each time customers change supply could potentially become a barrier to switching.

Gaining suppliers inheriting non compliant metering systems may through discussion with DCC be able to enrol the technology deployed. However we recognise that in situations where this may not be possible, it would seem appropriate that the costs of any upgrade of opted out metering systems should be borne by the gaining supplier requiring the change in discussion with the customer.

**Q17. Do you agree that the design and implementation of outage reporting functionality should be assigned to CSPs, documented in the communications hub technical specification?**

This should be delivered through the most cost effective solution but should not require changes to any compliant meters that may have already been installed extant at the time with the version of SMETS.

**Q18. Do you agree that it would be inappropriate to require meters operated outside DCC to be required to implement outage reporting? Please provide rationale to support your views**

This is not really a question for suppliers to answer. Ideally all sites should be connected via the same communications network however given the decision early in the programme to enable opt out for non domestic sites, there may need to be further cost benefit analysis to answer this question with certainty. Network operators maybe best placed to respond to such an information request. Any decision needs to be mindful for future smart grid implications.

As detailed in our answer to Q15, it is our intent to use the DCC for all our non domestic metering communications.

**Q19. Do you agree that maximum demand registers should be included in SMETS? Please provide evidence to support your position and provide evidence on the cost implications of delivering this functionality via back office systems or via the meter.**

This is for the DNO's to establish their business case for the requirement. If the business case is positive for customer benefit, the requirement should not then be retrospectively applied to compliant meters already installed.



**Q20. Do you agree with the proposal not to include the capability to generate additional voltage alerts based on counter thresholds in SMETS 2? Do you have any evidence that could justify including this functionality in SMETS 2?**

This is for the DNO's to establish their business case for the requirement. If the business case is positive for customer benefit, the requirement should not then be retrospectively applied to compliant meters already installed.

**Q21. If DNOs were permitted to access remote disablement functions, should control logic be built into DCC systems or meters? If the logic should be built into meters, should the logic be specified in SMETS 2? Please provide rationale to support your position including estimates of the cost of delivering this functionality under the different options being considered and any evidence relating to safety issues associated with each option.**

To avoid customer confusion communications should be via the suppliers rather than DNO. We are not convinced that Distribution Network Operators (DNO) need the functionality and it should be for DNO's to make the case for the requirement. We would not wish to pay for functionality in metering systems for which there may ultimately be no benefit for suppliers and more importantly for customers. On balance therefore, it would seem sensible to have this functionality introduced through the DCC when its benefit and application in a smart grid scenario is fully understood.

The issue for DNO remote disablement is further clouded at present whilst debates on security architecture are concluded.

**Q22. Do you agree that variant smart electricity meters should be specified in SMETS 2 and that the cost uplift for variant smart meters is similar to that for variant traditional meters? Please provide evidence of costs to support your views on cost uplifts.**

Yes.

**Q23. Do you agree that randomisation offset capability should be included for auxiliary load control switches and registers as described above? Do you have views on the proposed range of the randomisation offset (i.e. 0 - 1799 seconds)? Please provide evidence on the cost of introducing this functionality.**

Yes.



**Q24. Do you support Option 1 or Option 2 for 'pairing' a CAD to the HAN? Please present the rationale for your choice and your views on the implications that these options have for the technical design of the solution.**

We do not consider either option to be necessarily satisfactory. There are disadvantages with both option 1 and 2 but of the two we consider option 2 preferable. We consider there should be limited supplier involvement in the pairing of these devices and therefore suggest an alternative approach as outlined in our response to Q.26.

**Q25. If Option 2 were adopted, do you agree that obligations should be placed on energy suppliers to support this process by submitting 'pairing requests' to the DCC on request from their consumers?**

We do not consider placing an obligation on suppliers to be the right approach.

**Q26. Do you consider that other CAD installation options should be pursued? If yes, please explain the approach you favour and your reasons.**

Yes.

- A customer could purchase a CAD from a retailer outlet. Part of the product may include a link to a web portal provided by the DCC.
- On connecting to the link the customer would enter key details about the product for verification and also enter current meter readings to verify the premise and metering system HAN they wish to join.
- The DCC could verify the details of the device i.e. it is a secure and approved device also verify the meter readings to ensure it's is going to be connected to the correct metering system at the premise.
- Once verification by DCC is complete a code is provided to the customer to enter via the meter to securely bind the devices.

We acknowledge there maybe some limitation in this approach for customers who may have out side meter boxes open to general public view and therefore potentially open to abuse. However, we consider on balance the probability of the risks occurring to be at worst very minimal.

In considering the requirements to pair or bind securely the CAD, an outstanding issue remains concerning the process that any third party undertakes, to verify that services that have been requested have been made by an individual living at the premises in question. This was a question raised in the Data Privacy consultation earlier this year and we have provided and updated our alternate view here once again to highlight that options do exist. The current Detailed Design Specification for SMETS v1 and SMETS v2 does not include functionality or capability for an IHD to display an identification number. More work is required in this area before the SMIP is able to make any firm decisions and we request clarification that there are no additional requirements in the SMETS for Customer Identification Numbers/Personal Identification Numbers to be introduced.



**Q27. Do you agree with the proposal to include in SMETS 2 a specification for a PPMID, connected via the HAN, as described above?**

Yes. It is necessary to widen the access for customers to prepayment / PAYG products and to improve customer experience by carrying out transactions with greater comfort and convenience.

**Q28. Would including the capability to enable gas and electricity supply through a PPMID connected via (a) a wireless HAN or (b) a wired HAN meet GB safety requirements? What impact would including this capability have on the cost of smart metering equipment? Please provide evidence to support your answers.**

Yes, we consider that provided the customer is at the premise and carries out the necessary safety checks we see no reason why a concurrent reconnection should not be permitted on the PPMID rather than at the meter. We would consider that a safety issue could arise if the enhanced functionality of the IHD were capable of being used away from the premise e.g. on a mobile app so this function should only be permissible from the customers premises.

**Q29. Do you agree with the proposal that the communications hub should be specified such that it can support multiple smart electricity meters? How many smart electricity meters should be supported by each communications hub?**

Yes. The communication hub should be able to support multiple devices for example to support generation meters for micro generation. The exact number or maximum of such devices that may be supported may depend on the constraints of the HAN. For example there may be differences between the numbers supported at 2.4Ghz versus 868 MHz.

**Q30. Do you agree that a specification for a HHT interface to the HAN should be defined? If yes, please identify the functions that this interface would need to support and the scenarios in which such functionality could be required.**

We understand there is an SSAG sub group looking at this area and it is therefore unfortunate that this consultation is running in parallel with the sub group. However this is a critical piece of kit for installers and therefore decisions need to be made quickly such that suppliers and their agents can start to procure these devices with certainty.

Our expectation of the group is that it will answer questions such as what does the HHT do, what should it be permitted to do and in what circumstances? For example, we do not consider it appropriate for the HHT to be permitted to execute any write commands to the metering system such as adding credit to meters, but it may be appropriate in some circumstances to be used for installing and commissioning metering systems but this should not be the only means by which this activity is undertaken.

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Other questions the group needs to answer are what areas of the smart metering system maybe accessed via the HHT HAN connectivity? Clear and unambiguous answers to these questions will help suppliers define their approaches with regards to the use of these devices.



## **Chapter 5 Governance and Assurance of Security and Interoperability**

**Q31. Do you agree with the proposed approach to the governance of security requirements? If you propose alternative arrangements please provide evidence to support your views.**

We are comfortable with the proposed approach. In order for this to be a success however, it will be really important that the terms of reference for the new technical sub committee address operational as well as policy issues. It is important that the group is geared up to respond immediately to any security threats.

We note the comments with regards to risk assessments and believe it is critically important that from the start, that this new group has ownership of the existing programme risk assessment.

**Q32. Do you agree with the proposal to establish independent assurance procedures for DCC and DCC users? Please explain your views and provide evidence, including cost estimates where applicable, to support your position. Comments would also be welcome in relation to the impacts and benefits of the proposed approach with regard to small suppliers.**

Yes. Independent assurance is vital for building trust. It is therefore important that trust is not compromised through the incorporation of differing standards for different participants. All DCC users should be subject to the same base lined set of security requirements and a means of assuring this is to set out a common standard to which all DCC users should adhere. This could be achieved by placing a requirement for all DCC users to be certified with a recognised standard such as the ISO 27k suite with the additional requirements from the GB Companion specification.

We do not consider achieving certification with such a scheme to be onerous and consider that c.99% of the effort would already have been undertaken to reach compliance, the costs to the supplier is therefore only c.1-2% of its overall programme for security compliance.

**Q33. Do you agree with the proposal that re-testing should occur at least at set intervals and more frequently when significant changes to systems or security requirements are introduced? Please explain your views.**

Yes. Furthermore by ensuring certification with a recognised standard such as the ISO27k standard, users will have independent verification of their systems and processes and will also be subject to regular monitoring and audits through the ISO scheme. This ensures DCC users systems and processes remain compliant and trust worthy with the standard. In addition it would useful to understand what the programme considers to be significant



changes that would require a further audit. This may be a role for the proposed technical sub committee.

**Q34. Do you agree with the proposal to establish an independent security certification scheme for smart metering equipment? Do you have any views on the proposed approach to establishing a certification scheme or evidence of the costs or timelines for setting up such a scheme or submitting products for certification?**

Yes. A security certification scheme is urgently required for products, to provide confidence to industry to invest in Smart Metering Equipment Technical Specification (SMETS) meters. Such a scheme will help to build trust and assurance between industry parties and DCC. We have anticipated this requirement in our SMETS1 procurement and have utilised an independent test house to assure the product against the current known industry standards.

**Q35. Do you agree that sanctions for non-compliance with security requirements should be included in the SEC? Do you have views on the nature of the sanctions that might be imposed?**

Any sanction applied should be proportionate with the level of risk incurred by the participant and the wider programme.

The SEC assurance framework needs to be robust enough to ensure it is not simply ignored but at the same time mindful that risks and issues will occur from time to time and will therefore need to be managed effectively.

A framework therefore needs to have a clear policy for dealing with failure by industry participants with an emphasis on quickly correcting any issues as they occur and learning from these through exploration of the root causes to avoid repetition. For example the framework should consider how and why the event occurred, how quickly the supplier has responded to the event, how often events have occurred previously with the same supplier, has the supplier made other parties aware and how quickly the problem has been rectified.

**Q36. Do you agree with the proposal to, in effect, extend the arrangements already proposed for SMETS installations prior to DCC operation, to all installations being operated outside DCC? Please provide evidence of the costs that might be incurred and the impact of this approach on small suppliers.**

Yes.

In order for suppliers and meter asset providers to have confidence that the assets they deploy will remain in situ for their economic lives there needs to be an agreed level of assurance.

All suppliers should be subject to the same base lined set of security requirements and a means of assuring this is to set out a common standard to which all users of DCC services should adhere. A means of achieving this would be to place a requirement for all users to be



certified with a recognised standard such as the ISO 27k suite with the additional requirements from the GB Companion specification.

We do not consider achieving certification with such a scheme to be onerous and consider that c.99% would already have been undertaken, the costs to the supplier is therefore only c.1-2% of its programme costs for compliance.

**Q37. Do you agree that interoperability is central to the development of a successful smart metering solution and that activities related to the assurance of SMETS equipment should be governed by SEC? Please provide views on the governance arrangements that would be appropriate for assuring interoperability of smart metering equipment.**

Yes.

**Q38. Do you agree with the creation of an 'approved products' list and the requirement on suppliers and CSPs to obtain, retain and provide evidence of appropriate certification should apply regardless of whether they intend to enrol the equipment in DCC?**

Yes.

**Q39. Do you agree that protocol certification (against a GB Companion Specification) should provide adequate assurance that a product will meet interoperability requirements? Please explain your views and identify any additional assurance testing that you consider to be necessary and the rationale for including such testing**

Yes. Industry needs assurance that products being installed can be trusted and are being sourced from trusted organisations in order that the market can function correctly.



## **Chapter 6 Operational Licence Conditions**

**Q40. Do you agree with the Government's proposals to require energy suppliers to operate specific aspects of smart metering equipment functionality for domestic consumers? Please provide rationale to support your position.**

We understand the rationale that Government are suggesting for implementing these new set of obligations on Suppliers to ensure that smart metering equipment functions for the benefit of consumers.

**Q41. What are your views on the Government's proposals to require energy suppliers to operate specific aspects of smart meter equipment functionality for micro-business, but not other non-domestic, customers?**

This would seem a proportionate measure as market forces will drive Supplier's or 3<sup>rd</sup> parties to deliver the requirements of large businesses.

**Q42. Do you agree that the licence conditions as drafted effectively underpin the Government's policy intentions for consumer operational requirements?**

No, we have concerns with regard to the obligation upon Suppliers to establish Communications Links both at a WAN and at a HAN level. It is not clear at this stage that the WAN and HAN services will be available to all customers in all situations. Therefore Suppliers would not be in a position to comply with the Licence conditions suggested in the draft.

We believe it is not appropriate at this point in time to include these types obligation and that these should either be left for inclusion within the SEC or be a more generic obligation to facilitate the DCC's role in the provision of an operating communication module for the smart meter.

**Q43. What are your views on the Government's proposals for obligations to be included in the SEC for information to be made available to Network Operators and ESCOs via the DCC?**

Using the SEC as the governance mechanism to oversee the required configuration of smart meters is sensible. The SEC governance can evolve and respond to the needs to stakeholders in a flexible manner. It will provide clarity and visibility of what changes are being proposed, what requirements there are for Suppliers and what other stakeholders can expect from a smart meter.

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**Q44. Do you agree with the Government's proposals for the timing of the introduction of operational requirements? Please explain your reasoning.**

Yes the timing of the requirements seems to compliment the associated timescales for the implementation of SMETS1 & SMETS2 compliant meters, the DCC and associated consumer protection regulations for advanced meters.



## **Chapter 7 Next Steps**

**Q45. Do you agree with the proposed changes to the smart metering regulatory framework to reflect the CSP-led model for communications hub responsibilities? Are any other changes necessary?**

Yes, provisions within the DCC Licence are a robust manner in which to ensure the CSP led model for communication hub responsibilities are governed and regulated. Detailed requirements regarding the interactions between Suppliers and the DCC regarding the CSP can be accommodated for within the SEC.

**Q46. Do you agree that the equipment development and availability timelines are realistic? Please give evidence.**

We are comfortable with the proposed timelines subject to no substantive changes arising from security requirements.

**Q47. Do you agree that SMETS 2 should only be designated when the Government has confidence that equipment to satisfy the new requirements is available at scale? Should a further period of notice be applied to ensure suppliers can manage their transition from SMETS 1 to SMETS 2 meters?**

Yes. However, government needs to define what is meant by "at scale" this could for instance mean that a single supplier is able to procure enough assets to install themselves. Government should perhaps consider that meters are available from a number of providers. We also agree that it would be sensible that a reasonable notice period is provided to suppliers to enable them to manage their metering stock appropriately. We would suggest this could be 6 months from when fully accredited SMETS2 meters are available from at least two manufacturers.

**Q48. What are your views on when responsibility for the SMETS modifications process should transfer from the Government to the SEC?**

This should happen as soon as the SEC is established and operational.

**Q49. Which of the options (standing sub-committee or non-standing sub-committee) would you prefer in relation to modifications to the SMETS?**

A specific SEC sub-committee to assess changes to the SMETS seems logical as it would allow appropriately interested and informed stakeholders a platform to meet and discuss changes.



Whether this is a standing group or one that meets on a more ad-hoc basis is difficult to ascertain at this point as it's not clear what level of change is likely to be made to the SMETS.

This is not a great concern however as the only practical difference between a standing group and an ad-hoc group would be the underlying administrative costs incurred by the SEC Administrator. These are not considered material and should be something that is left for the SEC code governance to determine.

**50. Are there any particular areas of expertise that the sub-committee will need to fulfil its role, in terms of membership composition?**

We do not think so. Government may want to consider appropriate representation of DSP and CSP service providers to such a group to enable any issues potentially impacting these areas to be quickly and easily dealt with.