
From:
Sent: 09 October 2012 08:40
To: Energy Billing and Metering Consultation
Cc:
Subject: Consultation on the Second Version of the Smart Metering Equipment Technical Specifications

Dear Sirs

- Name:
- Organisation name: Network Rail
- Email:

Network Rail owns and operates Britain's railway infrastructure in England, Wales and Scotland and is a major user of electricity both for traction and non-traction purposes. Our response to the consultation on the above paper therefore relates to railway infrastructure and premises. Some railway premises are also operated by our customers and tenants who would normally be responsible for utility costs during their respective tenures.

We would like to make the following points with regard to the above consultation:

1. The programme to roll out SMART meters should prioritise meters that are life expired, in the first instance, along side new meter installations to minimise disruption and cost to the customer.
2. Meter technology should be required to report outages as standard and the DNOs should be able to 'ping' information back to the meter / end user to notify of planned power outages.
3. The design and implementation of outage reporting functionality should be assigned to Communication Service Providers (CSPs) and documented in the communications hub technical specification.
4. We agree that the maintenance of smart meter security requirements would be best achieved through a technical sub-committee to the Smart Energy Code (SEC) panel. This should include a representative from Network Rail as well as other interested parties, thus drawing on input from risk assessments that are produced.
5. We agree with the establishment of independent assurance procedures for Data and Communications Companies (DCCs) and that DCC users are required to assure that the system works. There would be minimal costs involved in establishing such procedures (high costs at the start) and the benefits would far outweigh any risk to small suppliers. Without assurance procedures in place the financial risk may outweigh the cost benefits in the longer term.

We thank you for the opportunity to comment and hope that the above provides useful points for your consideration.

Best regards

Network Rail
