



In Section H4.8, the title above has a typographical error, instead of "obligations of the User" should be "Obligations of Users", to be consistent with other titles.

In Section H4.9, sub-paragraph (e), we believe there is a typographical error with 'data range' and this should be 'date range'.

In Section H4.14, we note that the title above, "CoS Update Security Credentials" needs a definition under Section A1.

In Section H4.15, sub-paragraph (b), we believe "whose right to send", should be redrafted as "who has the right".

In Section H4.17, sub-paragraph (a), we believe "is failed" should be redrafted as "fails".

In Section H4.19, the obligation should stipulate that "...following receipt of the Successful Service Response on which such Sequenced Service is dependent." We would not want an unsuccessful response to initiate the start of the next Service Request in the sequence.

Parsing and Correlation

7. Do you agree with our proposed text for the SEC with respect to Parsing and Correlation? Please provide a rationale for your views.

We agree with the principle of the proposed text with respect to Parsing and Correlation. We note that whilst the detailed design is in progress, that there may be further drafting changes to accommodate and reflect the base lined design.

We believe that there should be an obligation placed on the DCC to ensure that the Parse and Correlate Software will be maintained in line with modifications to the relevant Technical Specifications, such as GBCS and DUGIS. It is essential that no new versions of those specifications may be implemented without an updated Parse and Correlate product being available. Without such control, the situation could arise where meters might be manufactured (or firmware updates released) with messaging that is incompatible with the Parse and Correlate Software. This could leave meters partially or wholly inoperable.

Enrolment in the Smart Metering Inventory

8. Do you agree with our proposed text for the SEC with respect to Enrolment in the Smart Metering Inventory and other associated processes? Please provide a rationale for your views.

We agree with the principle of the proposed text however we note that whilst the detailed design is in progress, that there may be further drafting changes to accommodate and reflect the base lined design.

In Section H5.29, we note that there is a typographical error, "Where the SMI Status of a Device that has been changed to 'pending' in accordance with Section H5.27 remains..." This should reference Section H5.28.

Since the drafting in section "H5 - SM Inventory and Enrolment Service" is only for all Type 1 Devices, it seems clearer in the drafting to state this, instead of using the term "Devices (other than a Type 2 Device)". This would enable specific clauses for "Type 2 Devices" or "x Devices" to be drafted at such a time that these can be articulated and fully defined.

In Section H5.12, we note that there are references to SMKI, this needs to be defined in Section A1 Definitions.



Intimate Communications Hub Interface

9. Do you agree with our proposed text for the SEC with respect to the Communications Hub: Intimate Physical Interface? Please provide a rationale for your views.

We are pleased to see that the provisions that DECC are proposing, with regard to the ICHITS recognise that the development and roll-out of Smart Meters for the UK, is not a short term project delivery, based on a single simple solution (which will suit, at DECC's estimate, around 70% of the relevant properties) but will involve some significant developments with regards to HAN technologies to achieve the objectives that DECC have set.

The good work that BEAMA have completed in this area, prior to appointment of the DCC, has delivered an outline specification which addresses the need for PLC links and the need to optimise traffic management and radio performance for Sub-GHz ZigBee implementations.

It is important that any early modifications from BEAMA's proposed specification recognise the following points:

- 1 Our investigations, based on DECC's published radio propagation model and Siemens collation of available Multi-Dwelling Unit (MDU) meter positions indicate that Point-to-Point PLC links are likely to be required for at least 1.1-1.3m MDU properties in GB and for a significant proportion of the 1.25m largest rural properties.
- 2 The same investigations show that at least 0.6m MDU properties will need Sub-GHz ZigBee and many non-MDU properties will also require this technology. The latest feedback from the EUK work on Sub-GHz ZigBee suggests that efforts to optimise coverage are still very important to maximise the benefits of that solution for the GB Smart Meter roll-out.
- 3 Shared PLC bridge solutions, covering both CH-IHD and CH-GM links are likely to be needed for at least 0.4-1.1m properties depending on the effectiveness and delivery timescale of the Sub-GHz ZigBee solution.

These points reinforce the need to ensure that DCCs redesign of this physical interface do not remove the provisions made by BEAMA for measures which are intended to support these features - unless DECC is prepared to accept large numbers of 'Dark Gas Meters' or WAN connected Gas meters.

We remain concerned regarding the long term operation and maintenance of "hot shoe" connected communications hubs. In order to manage these devices safely appropriate governance is required, especially as operational responsibility will change between parties upon change of supplier. Rules are required to determine how the power consumption associated with all Communications Hubs is to be treated. Given that some properties may have multiple communications hubs as an enduring solution. Clarification is required whether this is to be included in the SEC or via other appropriate industry governance.

We would be happy to discuss these points further with DECC and the DCC if so required.

DCC Service Management

10. Do you agree with our proposed text for the SEC with respect to DCC Service Management? Please provide a rationale for your views.



We support the proposed text with respect to DCC Service Management subject to clarification of Paragraph 215 of the Consultation Document which requires that the DCC must provide advance notice of the implementation of the proposed change; we cannot find this notice period within the current drafting.

Incident Management

11. Do you agree with our proposed text for the SEC with respect to Incident Management? Please provide a rationale for your views.

In Section H9.2, sub-paragraph (c), we are not in a position to resolve incidents beyond acting upon instruction of the DCC to replace a Communications Hub. We would expect full financial compensation for any such task.

In Section H9.2, sub-paragraph (d) we believe it is not cost effective for Users to employ technical resource to remotely diagnose faults. The DCC has such resource and we would expect the DCC via its system/SLA monitoring activity, to be aware of any incident before us. Parties are paying for a comprehensive service and upon failure of that service we would expect the DCC to carry out a thorough investigation and if a site visit is required to instruct us accordingly.

For example: DCC do not receive a gas meter reading - they ascertain that; their WAN and Communications Hub are working correctly, the Gas Proxy is present and the HAN is established, therefore the gas meter is no longer visible to the HAN and a site visit is required. DCC therefore instructs us to attend site and investigate reconnection to the HAN or exchange of the Gas Meter.

In Section H9.11, We are concerned that the requirement of this Section could not reasonably be met within 2 working days. It would be more appropriate for an initial report to be provided within this timescale and a further 'final' detailed report required within a reasonable (to be determined) timescale.

We note that Section H9.13 referenced in Section H9.11, does not exist.

Self-Service Interface

12. Do you agree with our proposed text for the SEC with respect to the Self-Service Interface? Please provide a rationale for your views.

We agree with the principle of the proposed text with respect to the Self-Service Interface. We note that whilst the detailed design and DCC Design Forum for Self-Service Interface is in progress, that there may be further drafting changes to accommodate and reflect the base lined design.

In Section H8.15, sub-paragraph (a), we are concerned about the access controls that will be applied to Users to authenticate their right to retrieve and extract data. We would like to seek clarification that there will be appropriate processes and controls in place to restrict the possibility of data mining. We believe that Meter Serial Number should be a reference that can be searched on by Users, in addition to those specified in the current drafting. This piece of data is a key item used for triangulation purposes and would further assist in Users being able to tie up DCC data with other Industry data.

We believe it would be useful for network operators to have visibility of information primarily designed for suppliers, especially for details such as meter type, meter model, firmware version installed and issues/ configurations associated with auxiliary load control.

We would require current and archive information to be searchable and available via the Self-Service Interface.



Security Requirements

17. Do you have any comments on the security obligations set out in Section G of the SEC drafting or the way they are expressed?

From an Information Security perspective the obligations are very clear and are in line with the work that has been carried out in the programmes' Risk Assessments and discussions in various Security Groups.

We are concerned by the apparent duplication, and conflict, between the Security Requirements, where the drafting does not consistently reflect the intent of discussions. We would like to seek clarification from DECC to resolve these differences, and therefore the differing mandated obligations on Suppliers. In particular, the definitions used within the documents:

- "FSG"
- "Security Architecture v0.6.2" Document
- "SEC2" drafting (E.g. anomaly detection in SEC v 0.6.2)

We cannot accept the current SEC2 drafted definition for "User Systems" and we would seek further drafting. In particular part (b), the intent is far further reaching than the discussions outlined. The discussions during DECCs recent Section G read through suggests that DECC understand the issue and its resolution.

We agree with Section G 1 General Provisions, where a differentiation has been set out between those "User Roles" capable of requesting consumption data and further and those who have very limited capability, e.g. the Export Electricity Supplier.

We support the substantive 7 clause obligations on DCC, though we would look for Section G2.3 to be more specific in its obligation to ensure resolution.

We would question the current drafted route for these Disputes (Section G1.5), as we would have expected that the SSC would play a role in some arbitration before needing to go to the Panel for final resolution?

We are concerned about the Risk surrounding the gap between DCC developing systems and the obligations in Section G being designated and enforceable. Though we would seek DCC to engage in further discussion with the TSEG to ensure the gap can be bridged.

In Section G2.14, we question why this has not been drafted as "DCC Total System".

We believe DECC have captured the intent of discussions, in the current ON Users (Section G3) and Organisational Security: Obligations on DCC and Users (Section G4), unless otherwise stated in this consultation response separately. See our response to the definition of "User Systems", the End to End Security requirements and the current apparent BS7858:2012 security screening.

In Section G3.13, sub-paragraph (b), we would seek for this to be redrafted, as it is the companion clause for (a) around the Supplier Parties obligation to detect an Anomalous Event, to ensure our obligation on reporting is only "on the detection of an occurrence of any Anomalous Event..."

We have a concern with the current SEC2 drafting around the Organisational Security Obligations on Users. We support the reordering of section G4.1 and 4.2, suggested at the recent DECC Section G discussions. This would ensure the obligations, to apply relevant security screening on individuals, are appropriately placed on the right Users Personnel.

We would look for all incidents to be reported in some form, the current wording in this section might lead the DCC to determine which incidents are significant to be recorded and reported on. Whereas



we believe it would be helpful for details of all incidents to be recorded, for relevant reporting at the end of the year, and statistics in the years to come, to help the DCC, SEC Panel and SSC to appropriately carry out all their duties of care.

18. Do you have any comments on the appropriateness and / or the proportionality of the security obligations in relation to particular types of DCC Service Users and their role?

We believe from an Information Security prospective the security obligations are appropriate and proportionate and having reviewed them against our current vetting and HR processes there is no major impact on the company. Other areas of High risk such as user within the DCC have to have a higher level of vetting and accreditations in proportion to their roles.

We remain concerned regarding the high costs associated with Network Operators managing critical commands with no access to functionality that could potentially deliver significant benefits to our customers. This is not supportive of obligations to maintain efficient, economic networks.

Communications Hub Financing

19. Do you agree that the four additional provisions are proportionate responses to providing reliable and economic third party financing options for Communications Hubs?

We are surprised that such additional provisions are necessary given that the DCC and its majority Users are licensed undertakings. This arrangement must virtually eliminate any possibility of bad debt and on this understanding we would have expected financiers to offer extremely attractive rates.

We remain to be convinced that these additional provisions would offer 'substantial' savings as claimed within Paragraph 308 of the Consultation Document, and look to DECC to provide information to support this claim.

If the claim is substantiated we are reasonably content with the provisions but have the following comments:

- In the definition of a 'Communications Hub Finance Acceleration Event' it makes it clear that the DCC may become liable for the unamortised asset value of the Communications Hubs. We need to understand the situations that may trigger this event as this could be a very substantial sum for which, under these arrangements, Parties would be liable; and
- Any income accrued by use of the 3 month float must be treated as regulated income for the DCC and thereby reduce their User charges.

Communications Hub Servicing

20. Views are invited on the proposals in relation to Communications Hub asset charges and maintenance charges. This includes:

- Monthly Communications Hub Charge
- HAN Variant Pricing
- Monthly Maintenance Charge

We believe that communication hub charges should be bundled into the overall DCC charging since it is an integral part of providing the service. This approach would greatly simplify charging arrangements.

Monthly Communications Hub Charge (from delivery to installation of Communications Hub)

We do not support an explicit charge in advance of commissioning. However to encourage both first-in first-out usage and a reasonable stock holding, we would support the levying of flat charge per communications hub applied 3 months from the date of delivery, for any communications hubs that have not been commissioned.



In Condoc Paragraph 314, we note these assets will transfer to the new CSP on future contract award, we would expect the charge to remain based upon a 10 year life and not increase from Sept '18 as this clause provides.

Monthly Communications Hub Charge (from installation of the Communications Hub)

We support DECC's minded position i.e. smear the Monthly Communications Hub Charges across Suppliers, based on a market share of enrolled Smart Metering Systems.

HAN Variant Pricing

We do not believe that the material cost differential of the variants will be sufficient to warrant the complexity of differential charging. On this basis we would support a single smeared charge for the Communications Hubs.

Monthly Maintenance Charge following Communications Hub Function commissioning

We support DECC's minded position i.e. smear the Monthly Maintenance Charge across Suppliers, based on a market share of enrolled Smart Metering Systems.

21. Views are invited on the proposals in relation to charges following removal of a Communications Hub. In particular, views are invited on the proposals for no fault removals in split fuel households. Do you agree that any outstanding asset costs should be smeared across all users rather than being charged to the installing or removing Supplier when Communications Hubs that do not serve the second installer's equipment are removed from split fuel households? Please provide a rationale for your views.

Exception 1: No Fault Removals – Non-Domestic Opt out

We remain firmly of the view that all costs arising as a result of a supplier opting-out and causing a compliant communications hub to be removed must bear these costs. The supplier's choice must not impact other suppliers' costs that are utilising DCC services.

Exception 2: No Fault Removals – Split Fuel Premise

We support DECC's proposal that the remaining asset cost of that Communications Hub should be smeared across a market share of commissioned Communications Hub Functions.

Exception 3: No Fault Removals - Early Technology Refresh

We support DECC's proposal that the CSP is responsible for covering site visit costs in this circumstance,

Fault Removals - Type Fault Compensation

We have always argued that the DCC should be liable for the full cost of all site visits required for communication hub exchanges that are not our fault – this we believe would incentivise the correct procurement actions rather than delivering a result where a 0.5% failure rate is seen as acceptable. It must be appreciated that the current approach leaves us liable for some £1.25M per annum as a result of the 0.5% threshold.

Given the current understanding of the actions required to complete a Communications Hub exchange we are supportive of the £50 liquidated damage payment. We also appreciate that there is an opportunity to revise this sum in the light of experience via the SEC modification process.

Fault Removals - Batch Fault Compensation

We do not believe that it will be technically possible for us to quality check deliveries beyond evidence of physical damage. We have difficulty in understanding why the batch fault rate should be any higher than the type fault rate.