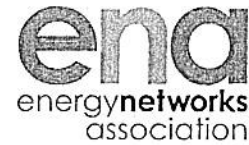Smart Metering Implementation Programme Regulation
Department of Energy & Climate Change,
Orchard 3, Lower Ground Floor,
1 Victoria Street
London SW1H 0ET
Tel: 0300 068 5953
Email: smartmetering@decc.gsi.gov.uk

ena
energy**networks**
association

6th Floor
Dean Bradley House
52 Horseferry Road
London SW1P 2AF
T
F
info@energynetworks.org
www.energynetworks.org
Registered Office as above

29 November 2013

Dear Sir/Madam,

Energy Networks Association Response to the Smart Metering Implementation Programme Consultation on New Smart Energy Code Content (Stage 2)

Thank you for the opportunity to respond to your consultation on the proposals for the smart metering system and equipment testing.

As you are aware Energy Networks Association (ENA) is the industry body representing the UK's electricity and gas transmission and distribution network operators. The following comments are provided by ENA on behalf of its member companies in response to the DECC consultation which was published on 17 October 2013.

Most ENA member companies have responded individually to the consultation. The comments in the appendix accompanying this letter are submitted in support of the individual submissions provided by our member companies.

If you require further information or you wish to discuss any of the content of this reply please contact

Yours faithfully

Energy Networks Association

APPENDIX
Energy Networks Association Response to:
Smart Metering Implementation Programme Consultation on New Smart Energy Code
Content (Stage 2)

General Comments

Our members are generally aligned in their views on DECC's proposals and share the concerns highlighted below.

- Our members have concerns regarding the proposals for Registration Data Provider obligations regarding the provision of refresh data;
- DCC should continue to use profile class as a proxy to estimate the number of non-domestic meter points;
- Our members do not agree that it is sensible to measure provision of the DCC with a 'data refresh' within a set number of calendar days. The majority view is that the refresh process should remain in line with current MRA obligations;
- Our members are concerned about the differences between Annex 5 of the consultation document (User Gateway Services Schedule) and the individual documents that define these services e.g. SMETS, CHTS, DUGC, GBCS especially as these source documents are still under development. There is a need to ensure that the SEC is aligned with these documents. The 'User Gateway Services Schedule' is referenced several times in the consultation document, yet it's status and governance arrangements are unclear; it is not a document included in the list of Technical Specifications in Annex 3;
- It is essential that Electricity Network Operator's schedules should not be removed from the meter as part of the Change of Supplier process;
- Our member recommend that the Smart Meter Inventory contains a reference between DEVICE ID with MPXN ID; this data could possibly be contained with new D350 flow from the DCC;
- Given the significant uncertainties associated with estimating the volume of User Gateway services, some of our members do not agree with the proposed text for the SEC in respect of managing demand and believe that 110% is a potentially flawed measure that could encourage overinvestment in the CSP's /DSP's infrastructure;
- Our members are surprised and concerned about the implications of paragraph 400. (All Services listed in this Schedule (including Alerts) will attract an Explicit Charge pursuant to K7.5(b)). We were unaware of there being any discussions on separate charging for alerts (outside of the fixed charges) and had assumed that costs for that alerts would be included in the fixed charges; this assumption being based on charging discussions earlier in the year indicating that alerts did not affect the sizing or capacity (and hence the cost) of the communication infrastructure when compared to other DCC services. If the fixed cost will not include the sending of alerts, then our members would expect to see a reduction in the fixed cost to reflect this. It would also be helpful if the DCC could advise our members on what other services will be charged outside of fixed charges;
- Some of our members have expressed concerns about the proposed communications hub funding arrangements and the potential for some costs, e.g. those relating to communication hubs removed from service, to be smeared across all DCC users including DNOs, particularly as these items of hardware will be transported, installed, removed, stored and potentially disposed of by Suppliers. Some further details of these concerns are set out below.

Communication Hub Funding

Whilst the communication hubs will be initially financed by the Approved Finance Party our members assume that the day-to-day physical management of these hardware assets will be managed by suppliers in similar ways to how meter assets are managed by suppliers today (meter assets funded by Meter Asset Providers (MAPs)). There are issues in the way that

meter assets are managed now, including how meters are handled and transported; unnecessary premature asset replacement; asset stranding and assets reported as faulty which are found to be sound upon testing. The application and recovery of charges to remunerate the Approve Finance Party should therefore carry appropriate signals and incentives for suppliers to manage communication hubs appropriately.

In relation to charges following removal of a Communications Hub, including for 'no fault' removals, The majority of our members do not agree that any outstanding asset costs should be smeared across all DCC Users. We believe that such costs should be borne by suppliers to provide signals for appropriate behaviours, specifically to encourage efficient use and re-use of communications hubs.

ENA members support DECC's 'minded to position' to reflect the Monthly Asset Charges as an Explicit Charge in the SEC which the Supplier is required to pay to the DCC on a monthly basis, from the point they take delivery of each Communications Hub. We agree that this should ensure that Suppliers have the appropriate set of incentives at that stage in the installation process. The majority of our members do not support the alternative of smearing a Monthly Communications Hub Charge within the DCC's fixed cost base and allocation across all DCC Service Users as we believe this could drive inappropriate installation market behaviours.

Our members are uncomfortable with the provisions as drafted in Section M of the SEC stage 2 in relation to Third Party Rights. We would welcome clarification on whether the intention was that the Approved Finance Party should have the ability to pursue all DCC Users or only Supplier Parties. If the intention is the latter then the drafting should make reference to Supplier Parties or include a new defined term of 'Supplier User'.

ENA Response to Consultation Questions

Technical Governance and Change Control
Q1	Do you agree with our proposed text for the SEC with respect to Technical Governance and Change Control? Please provide a rationale for your views.

ENA members agree with the proposal for Technical Governance and Change Control. This provides additional technical expertise with regards to change proposals, modifications and reviews of the Technical Specifications and End to End Technical Architecture of the Smart Metering Systems. However, ENA members seek reassurance that this body will have sufficient resource to enable it to carry out its responsibilities without becoming a bottleneck for technical changes. Our members suggest that the SEC Panel should consider selecting Technical Sub-committee members such that there are representatives from all key stakeholders so that the impact of any changes can be assessed against all Users requirements.

Some of our members suggest that it would be more appropriate for the first version of the End to End Technical Architecture to be produced as a Technical Specification to the SEC as part of the design phase, rather than later on, at the refinement phase. The major opportunity for this document to add value (by fostering understanding of the solution) will have passed before the refinement phase.

Our members would like to see a stronger definition of the interaction between a Panel Working Group and the Technical Sub-Committee. This would provide a robust Governance and Change Control model in respect of technical considerations. They are also concerned that the membership of the TSC is to be determined by the SEC Panel and question how the Panel will be able to do this. Determining the skills required and the appropriate level of expertise appears to be onerous and possibly outside the experience of the Panel. Our members would therefore seek a definition of the membership and areas of expertise required to meet the duties of the TSC.

Registration Data	
Q2	Do you agree with our proposed text for the SEC with respect to Registration Data? Please provide a rationale for your views.

The vast majority of our members are in general agreement with the principle of the proposed text with respect to the Registration Data. Whilst the detailed design and DCC Design Forum for Registration Interface is in progress, our members expect that there may be further drafting changes to accommodate and reflect the base lined design. However, one of our members does not agree with the proposed text with respect to Registration, and they have provided their rationale in their individual response to the consultation.

ENA members are pleased that the Data and Communications Company (DCC) and the Registration Data Providers (RDPs) have already started to meet to agree the details of the Registration Interface Specification and Code of Connection. We support this approach as a way of finding the optimal solution.

Our members expect that the ability to easily match MPANs/ MPRN's to UPRN data will evolve over time. Members consider that matching 80% of MPAN's/ MPRN's to UPRN's would be a reasonable initial target. Reasonable endeavours should then follow to populate UPRN data over time.

The proposed text at E2.4 (provision of data to DCC) lists the specific data items to be provided by the Registration Data Provider, and this seems suitable. However, the proposed text at E2.5 (provision of data by DCC) does not list the specific data items to be provided by the DCC. Therefore, at this stage we are unable to confirm that the overall solution will work properly. This is dependent on the design completion process.

Some of our members question why, when DECC have drafted two Registration Interface Specifications (for Electricity and Gas), the specific data items remain duplicated within Section E. Experience from other codes shows that this can become problematic to manage. In Sections E2.1 and E2.2, the data items are very specific without acknowledging the life of that data. Some items may be optional or empty for valid reasons under specific reasons set out under the relevant Code. To avoid issues of non-compliance or in getting the list amended on change to the relevant Codes, it would seem more appropriate for the required data items to reside in the Technical Specifications.

Q3	The DCC currently uses profile class data as a proxy to estimate the number of non-domestic meter points registered to users. Should this be replaced with a new data item which accurately reflects non-domestic meter registration, or should the DCC continue to use profile calls as a proxy? If you think it should be replaced, should the DCC rely on Suppliers providing this information separately, or should a change be sought to electricity registration systems to collect this data? Please provide a rationale for your views.

All ENA members are of the view that the Profile Class should be used as a proxy to estimate the number of non-domestic meter points registered to users. As the Suppliers are responsible for updating this data item within the registration systems it does not seem sensible for the Suppliers to provide any other information separately and would probably use the Profile Class to determine this data. To introduce a new data item would increase risk on data quality and additional costs for system changes with no benefit, the DCC could introduce this at a later stage should registration data form part of the DCC at that time.

Q4	The SEC will include a requirement for RDPs to provide the DCC with a 'data refresh' on request, within a set number of days. Do you agree that it is sensible to measure in calendar days? If so, what is the impact of providing data refreshes to the DCC within two calendar days? If this has too significant an impact, what should the correct value be? Alternatively, do you believe it should be a set number of working days? If so, how long should this period be?

All ENA members are of the view that any requests for data from the registration systems must be in working days as the service is operational on working days as per the MRA and amending this could bring significant costs to companies.

The impact of providing data refreshes to the DCC within two calendar days would result in significant investment and change being required to the existing registration systems. The processing capabilities of current registration systems would need to be significantly upgraded with fundamental redesign likely. Increased complexity and capability within the registration systems is likely to increase the cost of software maintenance, change and release services. In addition, irregular requests for data extraction during unsociable hours would substantially increase costs with our IT service provider. Planned activity over weekends could be compromised, e.g. maintenance leading to increased risk and therefore management overhead.

It should be noted that the majority of our members would not be able to provide a full refresh within two working days. The MRA currently states a full refresh is to be scheduled within 15 working days of the request and for our members this seems reasonable.

Selective refreshes could be provided in one working day if received before 15:00hrs providing there is a threshold on the number of selective refreshes to be provided. The MRA currently states the threshold is 50 requests and if this number is reached then 5 requests should be actioned for each party (as Suppliers and Data Aggregators can request refreshes) allocated in the order they have been received. As it is difficult to determine the volume of requests from the DCC then it would seem sensible to keep it to the MRA obligations until more information is available. Some of our members suggest that a sensible approach would be to align the SLA timescales with the MRA obligations until the destiny of the registration service is known.

DCC User Gateway	
Q5	Do you agree with our proposed text for the SEC with respect to the DCC User Gateway? Please provide a rationale for your views.

Most of our members agree with the proposed text for the SEC, with respect to the DCC User Gateway, as this sets out the provisions for established connections between Users and the DCC User Gateway. It also sets out the requirements regarding the installation, use and removal of DCC User Gateway equipment.

However, our members express some concern about the differences between Annex 5 of the consultation document (User Gateway Services Schedule) and the individual documents that define these services e.g. SMETS, CHTS, DUGC, GBCS especially as these source documents are still under development. Annex 5 as drafted includes some inconsistencies with the current version of these documents. There is a need to ensure that the SEC is aligned with these documents. The 'User Gateway Services Schedule' is referenced several times in the consultation document, yet it's status and governance arrangements are unclear; it is not a document included in the list of Technical Specifications in Annexe 3.

Some of our members observe that the proposed text for the SEC places no restrictions on single

users with multiple connections being able to disadvantage others due to cost smearing. Our members are concerned that the ability of a User to request as many connections to the DCC User Gateway as they wish could give rise to significant expense to Parties. It is noted that this will be dependent on the means of connection and the solution provided by DCC with associated costs, however, we would seek this section to have additional limits in place that reflect parties' forecast demand in that relevant period. It is therefore suggested that limitations on fair use and options for dispute resolution are included in the SEC.

DCC User Gateway Services and Service Request Processing

Q6	Do you agree with our proposed text for the SEC with respect to the DCC User Gateway Services and Service Request Processing? Please provide a rationale for your views.

The SEC text states that "Where the DCC executes a Change of Tenancy Service Request it will interrogate its schedules and remove those belonging to Other DCC Users as the permission of the customer can no longer be assumed". It is our current understanding that on a change of tenancy, schedules and data associated with Network Operator functionality will not be affected by Supplier processes. We would like to seek further clarification in the drafting of the SEC to confirm this requirement as we believe it essential that Electricity Distribution Network Operator's schedules should not be moved from the meter. This is because Electricity Distribution Network Operators' schedules relate to network specific data and exist for the benefit of the customer, e.g. triggering Guaranteed Standards payments, management of voltage variance from statutory limits

Although most of our members are generally in agreement with the proposed text with respect to the DCC User Gateway Services and Service request Processing, one of our members raises a number of concerns related to some of the sections, as follows:

- H3.4 – Does not include the provision of enrolment data (Device_id) unless this is to be covered by the Registrations Data Interface Specification?

- H3.24 – This clause states that all Service Requests; Future Dated Services and Scheduled Services will be cancelled after the DCC has received a Service Response to 'Restrict Access for Change of Tenancy' occurs. It may be applicable to cancel other Users requests however as the Network Operator will not change for the Smart Metering System there is no reason to cancel Network Operator requests.

- H3.38 & H3.43– with regards to the obligations of providing forecasts of the number of requests, six months in advance will not be achievable during the Supplier Smart Meter Rollout unless Network Operators are provided with accurate forecasts of the number of meter installations to be undertaken by the Suppliers.

Our members are also concerned that the maximum time for delivery of alerts is twice the time proposed for an On-Demand Service Request, despite the former having a need for less system processing. As some commands may directly impact distribution network loading, it is important that the target overall response times recognise the importance of the management of auxiliary load control for electricity Network Operators (even though delivery will initially be provided by suppliers).

Parsing and Correlation

Q7	Do you agree with our proposed text for the SEC with respect to Parsing and Correlation? Please provide a rationale for your views.
	Although most of our members are generally in agreement with the proposed text with respect to

Parsing and Correlation, some members raise the following concerns:

1. Our members suggest 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.

2. There should be additional detail to cover the User obligations and timescales for implementing new versions of the Parse and Correlate software into their systems. This is to maintain compatibility and enable Users to effectively plan and manage version upgrades of their systems.

3. The DCC should support at least two version releases of Parse and Correlate software save for exceptional; circumstances e.g. a significant security flaw/risk which would otherwise require all Users to update at the same time. However, further clarification/clarity is required on the action to be taken by the DCC in the event of problems being experienced by users in the operation of the Parse & Correlate software.

4. Paragraph 158 describes the arrangements where Alerts are generated by Smart Metering Devices. Do the same arrangements apply where an Alert is generated via a CSP solution e.g. in the case of a Power outage alert. In addition what are the arrangements for alerts associated with CSP infrastructure e.g. alerts associated with a fault in part of a CSPs network?

Enrolment in The Smart Metering Inventory	
Q8	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.

With one exception, ENA members are generally in agreement with the principle of the proposed text. We appreciate that whilst the detailed design is in progress, that there may be further drafting changes to accommodate and reflect the base lined design.

ENA members make the following points that should be considered for the next drafting of the proposed text for the SEC with respect to Enrolment in the Smart Metering Inventory:

- One of our members recommends that the Smart Meter Inventory contains a reference between DEVICE ID with MPXN ID; this data could possibly be contained with new D350 flow from the DCC. The SEC text only covers half the exchange, it specifies the data from the DNO to DCC and then generalises the data coming back the other way so we can only comment on the partially complete wording. There are assumptions around the use of UPRN and the possibility of matching with MPXN ID from Registration Data. These may be flawed assumptions.

- Enrolment also needs to cover the DCC responsibilities to notify DCC Services Users of enrolled systems including a mechanism to notify the relevant Device_id(s) to Users. Furthermore, where a DCC User does not participate at initial DCC go-live then there needs to be a method for the DCC to provide all relevant Device_id's at such time as the User commences participation.

- It is preferable to have a defined timescale for the DCC to notify Network Operators or Gas