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Smart Metering Implementation Programme – Regulation
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London, SW1H 0ET

28th November 2013

Re: Consultation on New Smart Energy Code Content (Stage 2) ref: URN 13D/273

Dear Sir,

The MRA Executive Committee (MEC) is pleased to provide a response to the above consultation on behalf of the Master Registration Agreement (MRA). MEC welcomes the opportunity to comment on the additional content to the Smart Energy Code (SEC) on areas that may affect the operation of and interaction with the MRA.

Of particular note are the proposals pertaining to Registration Data. The consultation outlines that any disputes between Registration Data Providers (RDPs) and the Data Communications Company (DCC), will be determined by the SEC Panel, whose decision will be final and binding.

Whilst MEC support the principle of a governance entity having a role in the settlement of disputes between Code parties, it is worth drawing attention to the potential for cross-Code issues arising from this approach, particularly if the remedy to the dispute lies in actions to be undertaken in accordance with the MRA rules. MEC therefore recommend that DECC acknowledge that such disputes may have cross-cutting implications for Codes other than the SEC, and accordingly require that resolution of any dispute takes these into account in reaching any resolution.

MEC note the suggested requirements for the provision of data refreshes to the DCC from time to time. The MRA already makes provision for either partial (Selective) or complete (Full) refreshes to be provided from an MPAS System on request from a duly recognised source. In this regard, MEC are pleased to confirm that the recent MRA changes introduced to support the requirements of SMRG WG4, included the DCC as a valid source and recipient of a Selective or Full Refresh. However, the timescales for fulfilling such requests are explicit within the MRA, as is the processing order. The proposals within this consultation are not commensurate with those rules and MEC confirm to DECC that, in the event that the

proposal is to be implemented, any such requirement will require a consequential change to the MRA. MEC expect MRA parties to provide their own views on the potential impacts of such a change in their responses to the consultation, which it is hoped will be taken into account when considering the approach to the provision of data refreshes to the DCC.

As DECC will be aware, MEC approved an amendment to the MPAN liability processing reports to include profile class to provide the information to the DCC to apportion market share for use in its billing. The consultation outlines an option to create a new data item that specifies where a site is a non-domestic site. MEC would support this option but would note that the development, consultation and implementation of this new data item may take in excess of six months based on our experience of the MRA change process and feedback from stakeholders on previous changes.

MEC note the requirements for the security obligations for the RDPs and also the responsibility for the DCC in the design and development of the Registration Data Interface. We consider both requirements as acceptable inclusions within the SEC and look forward to understanding the detail of these requirements and any impacts that they may have on the MRA.

If DECC require any further information please contact the Secretariat, Gemserv, who MEC understand have already provided information on the MRA rules to DECC, but would be happy to produce a written record of these requirements if that would assist DECC. Indeed, MEC would recommend that DECC consider the existing provisions of the MRA which provide examples of how Refreshes can be managed without undue disruption to other MPAS users, including the use of an annual 'refresh' which can be used for ratification purposes.

Please do not hesitate to contact me if you require any further clarification or detail regarding the points made above.

Yours faithfully