



Smart Metering Implementation Programme - Regulation  
Department of Energy and Climate Change  
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REDACTED, Tuesday, 17

**WINGAS UK Ltd Consultation Response to the Second Tranche of the Legal Text for the Smart Energy Code**

To whom it may concern,

WINGAS UK Ltd is pleased to have the opportunity to deliver feedback on this matter to DECC and hopes that DECC will take the opportunity to carefully consider WINGAS UK's response

This consultation response is written to deliver feedback on a number of key elements on the present draft of the Smart Energy Code.

Our initial observation is that the legal text does not seem to differentiate between domestic and non-domestic suppliers. According to DECC's statistical release on smart meters in Q2 2013; data on installed numbers of AMR devices has been gathered only from larger suppliers. WINGAS UK as with other I&C suppliers has been actively installing AMR devices for a number of years. There are no Smart Meters in our portfolio and we estimate that there are few to no Smart Meters in the portfolios of our competitors in our segment of the market.

Under WINGAS UK's current business plan it is highly unlikely that there will be a significant portion of our portfolio with Smart Metering equipment installed for the foreseeable future. Because of this it has been WINGAS UK's intention to opt out of dealings with the DCC wherever possible. The proposed licence conditions however, state that all suppliers of relevant premises (regardless of the nature of installed equipment) must be a party to the Smart Energy Code regardless of the relevance of Smart Metering to WINGAS UK Ltd as the supplier. It is clear in the current drafting of the SEC that no adequate provision has been made for suppliers who have a portfolio composition that is not typical of a large supplier.

In addition to the points above, under the current proposals it would seem that we are obligated to become a SEC signatory even if WINGAS UK Ltd would never interact with the DCC. Furthermore lack of interaction with the DCC has its own penalties via the default process. Combining the obligation to join and the default process would mean that as a supplier with no Smart Meters WINGAS UK Ltd would permanently be transitioning in and out of the SEC. Furthermore we find the use of the word "Default" in this context highly misleading.

Whilst we agree that the SEC should determine the minutiae for the requirements of the Gas Supply Licenses for security arrangements WINGAS feels that the SEC as currently drafted goes much further than necessary. Section G of the Smart Energy Code exceeds and adds to the obligations set out in the current license conditions, for instance, new obligations include the requirement to vet all staff who use DCC related systems even if the tasks they perform are unconnected to Smart Metering Equipment.

Further new obligations include implementation of a risk management system, an incident management system and the implementation of an Information Security Management system and a User Data Retention Policy.

In the context that WINGAS UK will not use the DCC to any great degree these additional standards seem to be particularly and unduly onerous. WINGAS UK also feels that the costs associated to implementing these measures are not proportionate to market share and so put smaller suppliers such as WINGAS UK Ltd at a competitive disadvantage.

In summary, WINGAS recommends that a number of points in the consultation are revisited in particular the issues laid out above.

We look forward to reviewing DECC's reactions to these consultation responses.

Yours Faithfully,

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