

Smart Metering Implementation Programme
A Consultation on New Smart Energy Code Content (Stage 2) TMA Data
Management Data Limited's response.

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.
TMA's response: Yes, we agree but would suggest the following correction in F1.4 c) replace the word Notification by the word Modification.	

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.
TMA's response: Yes, we agree.	
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.
TMA's response: The DCC should continue to use the Profile classes as a proxy to determine the number of non-domestic meter registration until more changes are introduced to the Registration Data and the DCC takes full responsibility for managing Registration data.	
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?

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	Alternatively, do you believe it should be a set number of working days? If so, how long should this period be?
TMA's response: Working days should be used, the number of working days should be driven by the criticality of the refresh for the DCC and the effort involved by the RDP's in producing the refresh, a value between 2 and 5 working days would be appropriate.	

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.
TMA's response: Yes.	

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.
TMA's response: We would suggest the following changes: H3.4 No Party may use the DCC User Gateway for any other purpose other than to meet the requirements of Section H3.2. (b) confirm that the User ID used to send the Service Request is that of a User with an Eligible User Role for that Service Request;	

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
TMA's response: Yes, the proposed text relating to Parsing and Correlation clearly sets out the obligations put on the DCC for that matter and provides the right to appeal from Parties on the platform chosen, with a final decision by the SEC Panel.	

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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.
TMA's response: Yes, the proposed text on Enrolment in the Smart Metering Inventory and other associated processes clearly identifies the responsibilities of the Users and the DCC.	

Intimate Communications Hub Interface

Q9	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.
TMA's response: Yes, the proposed text on the Communications Hub Intimate Physical Interface ensures that parties are consulted prior to any change being made and clearly states the obligations.	

DCC Service Management

Q10	Do you agree with our proposed text for the SEC with respect to DCC Service Management? Please provide a rationale for your views.
TMA's response: Yes, the proposed text on the DCC Service Management provides clear obligations on the DCC and the SEC Panel.	

Incident Management

Q11	Do you agree with our proposed text for the SEC with respect to Incident Management? Please provide a rationale for your views.
TMA's response: Yes, the proposed text on Incident Management provides a good framework, including a dispute process to raise, report and resolve Incidents.	

Self-Service Interface

Q12	Do you agree with our proposed text for the SEC with respect to the Self-Service Interface? Please provide a rationale for your views.
TMA's response: Yes, the proposed text on Self-Service Interface ensures that the Self-Service Interface provides an appropriate level of granularity to the Service users and clearly defines what should be included, how it should be used and maintained.	

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DCC Service Desk	
Q13	Do you agree with our proposed text for the SEC with respect to the DCC Service Desk? Please provide a rationale for your views.
TMA's response: Yes, the text on the DCC Service Desk ensures that the Service Desk is available to Service Users and SEC parties and clarifies under what circumstance the Service Desk should be contacted.	

Service Level Agreements for Testing	
Q14	Do you agree with our proposed text for the SEC with respect to the Service Level Agreements for Testing? Please provide a rationale for your views.
TMA's response: We suggest the following correction: H13.5 d) any anticipated reductions in the DCC's External Costs (as defined in the DCC Licence) arising as a consequence of the DCC Service Providers failing to achieve the Target Service Levels in respect of the Service Provider	
Q15	Does the inclusion of DCC aggregate performance measures in the SEC, and the consequential reduction in future service charges, appropriately balance the need for the DCC to manage its Service Providers flexibly with the need for DCC Service Users to have a say regarding performance targets? Please give reasons for your answer
TMA's response: The arrangements for Smart Metering are complex with many different parties involved. DCC performance monitoring is crucial in ensuring that the process works and that the DCC fulfils its obligations; that includes managing its Service Providers. The proposed text does strike a balance, ensuring that the flexibility to manage its Service Providers does not take precedent over the DCC Service Users involvement. The inclusion of DCC aggregate performance ensures a necessary level of transparency.	

Managing Demand	
Q16	Do you agree with our proposed text for the SEC with respect to Managing Demand? Please provide a rationale for your views.
TMA's response: Yes, the proposed text on Managing Demand ensures that the DCC gets visibility of the planned Service requests for the following 6 months with a quarterly update from Service Users and also mandates a yearly review from the DCC as to whether the measure of Service Requests remains relevant.	

Security Requirements

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Q17	Do you have any comments on the security obligations set out in Section G of the SEC drafting or the way they are expressed?
TMA's response: Yes. Most of the proposed requirements are already in existence within the Electricity Industry for parties under the Balancing and Settlement Code.	
Q18	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?
TMA's response: The proposed requirements are appropriate and balanced to the different DCC Services Users and their role.	

Communications Hub Financing

Q19	Do you agree that the four additional provisions are proportionate responses to providing reliable and economic third party financing options for Communications Hubs?
TMA's response: Yes. Ofgem is best placed to determine whether the DCC had been unable or unwilling to fulfil its role in pursuing the liabilities due by Suppliers in respect of Communication Hubs Finance Charges.	

Communications Hub Services

Q20	Views are invited on the proposals in relation to Communications Hub asset charges and maintenance charges. This includes: <ul style="list-style-type: none"> <input type="checkbox"/> Monthly Communications Hub Charge <input type="checkbox"/> HAN Variant Pricing <input type="checkbox"/> Monthly Maintenance Charge
<p>TMA's response:</p> <p>We agree that the Monthly Communications Hub Charge should be smeared on market share basis as it is both cost reflective and easier to implement than the exact cost recharge to each registered Supplier option.</p> <p>The HAN Variant pricing should be allocated to the installing Supplier to be cost reflective.</p> <p>The Communication Hub Maintenance charge should be smeared based on market share.</p>	

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Q21	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.
<p>TMA's response:</p> <p>If there is any asset cost remaining at the point of removal of the Communication Hub for DCC User faults, it should be allocated to the removing Supplier except in the 3 situations identified in the SEC2 consultation paper.</p> <p>For non-fault removal in non-domestic opt out, we agree that the remaining asset cost should be smeared across non domestic sector enrolled in the DCC.</p> <p>For non-fault removal in split fuel premise, if the second Supplier removes a Communication hub because it cannot serve its smart metering, to install a dual band communication Hub, we also agree that the remaining asset cost should be smeared across a market share of commissioned communication hubs functions. It would be near impossible to assess where the cause of the replacement lies, the first Supplier might not have had all the relevant information at the time of installation and the second Supplier cannot be held responsible for changing the Communication Hub to ensure that its Smart Meter is served. This solution is the most cost effective and easiest to implement.</p> <p>For non-fault removal for Early Technology refresh, we agree that the CSP should be responsible for the site visit costs.</p>	