



Smart Metering Implementation Programme
Regulation Team
Department of Energy and Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
LONDON SW1H 0ET
smartmetering@decc.gsi.gov.uk

Wales & West House
Spooner Close
Celtic Springs
Coedkernew
Newport NP10 8FZ

Tŷ Wales & West
Spooner Close
Celtic Springs
Coedcynyw
Casnewydd NP10 8FZ

T
F
www.wwutilities.co.uk

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**Smart Metering Implementation Programme:
Consultation on additional Smart Energy Code content (Stage 4)**

Dear Sir or Madam,

Wales & West Utilities (WWU) transports gas to 2.4M supply points in Wales and south west England.

We want to raise two issues, first the additional security requirements for registration data and second, the provision of Post Emergency Metering Services for smart meters.

Additional security requirements

WWU, together with other gas transporters, will use Xoserve as our Registration Data Provider ("RDP").

We recognise that the proposals set out in Section 12.3 to bring the provision of registration data into the scope of the Smart Metering Key Infrastructure ("SMKI") can deliver benefits to the SMIP in the form of enhanced data security. We are concerned that a decision to change the RDP security requirements at a relatively late stage in the SMIP lifecycle may require Xoserve to undertake a solution re-design and incur additional expenditure. Xoserve are seeking to mitigate this risk through early engagement with the DCC, particularly to clarify the correct protocol for the VPN Transfer Layer Security and we are keen that there is an early resolution of this matter.

The SMKI is governed by a number of SEC Subsidiary Documents and the proposed drafting amendments at paragraphs E2.14 – E2.17 of the SEC would place additional security obligations on RDPs. Xoserve have not yet had the opportunity to study these items in detail, and they would welcome continued support from the DCC and the wider SMKI community as they assess the impacts on their systems and processes.



We support the proposal that any RDP acting on behalf of more than one Network Party will not be required to subscribe to more than one Organisation Certificate.

Post Emergency Metering Services (PEMS)

Currently gas transporters provide Post Emergency Metering Services to gas suppliers. This provides the quickest response possible and enables a speedy restoration of supply to customers. We had assumed that the metering part of this service would have to cease with smart meter rollout owing to the security arrangements. We now understand that it may be possible for gas transporters to install a meter that is temporarily not allocated to a particular supplier. This will use the same process that enables a MAM to act for more than one supplier. WWU replaces only a few thousand meters under PEMS each year.

We wish to understand whether each gas transporter would have to be a DCC User to provide PEMS meter replacement services and what this would cost. As described above, gas transporters will use Xoserve as a Registration Data Provider. We also expect Xoserve to act as a DCC User for the purpose of extracting data from smart meters, fulfilling our licence obligation regarding anonymisation and aggregation and passing this data on to us. In view of our expected low usage of data this is efficient and reduces our cost and ultimately customers' charges. If each gas transporter had to become a DCC User to offer PEMS metering services this would make the cost which would be borne by gas suppliers and ultimately customers very high for a relatively small number of jobs.

We cannot determine whether the wording of H5.17 will require a gas transporter that installs a meter under PEMS to be a DCC User not least because H5.17 refers to the Responsible Supplier. It seems that the Responsible Supplier needs to provide updates before the meter is installed; however the nature of the PEMS process makes this impossible therefore it seems that the Gas Transporter may need to be a DCC User notwithstanding that it is not a Supplier. We would appreciate a clear statement on the implications of H5.17 for the provision of PEMS meter replacement services.

Yours sincerely