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Smart Metering Implementation Programme
Regulation Team
Department of Energy and Climate Change
Orchard 3, Lower Ground Floor
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23 December 2014

Dear Sirs

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

Thank you for the opportunity to respond to the latest Smart Metering Implementation Programme ("the SMIP") consultation in respect of the Smart Energy Code ("the SEC"). We are responding in our capacity as the Registration Data Provider ("RDP") to the principal Gas Transporters and the independent Gas Transporters, and have therefore focused our comments on the proposals as set out in Section 12.3 to bring the provision of registration data into the scope of the Smart Metering Key Infrastructure ("the SMKI").

We recognise that the proposals can deliver benefits to the SMIP in the form of enhanced data security. However, we are concerned that a decision to change the RDP security requirements at a relatively advanced stage in the SMIP lifecycle may require us to undertake a solution re-design and incur additional expenditure. We 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 to seek an early resolution of this matter.

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

As an RDP to multiple Network Operators, we support the proposal that any RDP acting on behalf of more than one Network Party would not be required to subscribe to more than one Organisation Certificate.

We are keen to continue to support the SMIP as it moves forward, and would be happy to meet with members of the DECC Smart Metering Team to discuss in more depth any of the matters raised in our response.

We are happy for you to publish this letter. If you would like to discuss further any aspect of our response, please contact

Yours faithfully