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*Response to DECC; Consultation on transitional arrangements in the Smart Energy Code*

*General Comments*

We are generally supportive of the proposals in this consultation. It is not clear what the plan is (or has been) to designate subsidiary documents under the SEC. It would appear that the situation that has led to this consultation and proposals for exceptional powers for the Secretary of State is potentially down to a lack of programme planning and understanding of timing of events.

In order to avoid similar issues arising elsewhere in the programme, DECC should provide a detailed plan of what is expected to be designated and when, so that participants responsible for delivery have a clear understanding of the road map ahead. For example a detailed plan including all milestones required to achieve Initial Live Operations and all elements to be delivered. This will provide all programme participants with a clear understanding of interdependencies, enabling potential pinch points to be truly managed across all parties. Having such a plan may have avoided issues we are currently experiencing with agreeing surveys for our connection to DCC.

The proposals to ensure communications hubs can be ordered from January 2015 appear to be a pragmatic approach. However, providing communication hub forecasts without a full Wide Area Network (WAN) checker in place from DCC, may impact the accuracy of these requests.

Given the constraints and additional risks that suppliers will be managing for this initial forecast and subsequent installation period, it would seem appropriate that the tolerance levels within the forecasts are reviewed and charges amended accordingly.

*Answers to specific questions*

*Question 1: Do you agree with the proposed transitional measures to support Communications Hubs forecasting for an interim period?*
*In particular: Do you agree that the proposal to submit forecasts via email for an interim period (until June 2015) is acceptable?*
*Do you agree that the DCC should provide certain WAN information via spreadsheet (CSV format) in advance of the full WAN information being available in June 2015?*
*If you do not agree, please explain your rationale.*

The proposals appear to be a pragmatic approach to the specific situation concerning communications hubs and orders. However, we are concerned that a general lack of planning within the DECC /DCC programme appears to have resulted in this situation occurring in the first place. We request that a granular view of the plan is provided to stakeholders so all programme participants are aware of what is needed by when to avoid any future issues.

Having to provide communication hub forecasts without a full Wide Area Network (WAN) checker and automated ordering system from DCC, may impact the accuracy of these requests. We have

received an initial version of the WAN coverage checker in .csv format, which provides a basic view of coverage. If a further improved view is available we request that DCC makes this available as soon as possible and that regular updates are provided up until the full checker becomes available in June 2015.

Under the proposals we will not be in a position in January 2015 to know what, if any, communication hub variants may be required and or auxiliary equipment needed at a location we may choose to deploy our initial SMETS2 installations.

Given the limitations and additional risks that suppliers will be taking on during this initial forecast and subsequent installation period, it would seem appropriate that the tolerance levels within the forecasts are reviewed to reflect this and charges amended accordingly.

Subject to the outcome of the detail of the communication hub forecasting process as detailed in the Smart Energy Code stage 4 (SEC4) Consultation, we agree that communication hub forecasts can be completed and submitted to DCC via email. However, we request that a secure email service is put in place. This will ensure this critical information is delivered safely and securely.

***Question 2: Do you agree with the proposed transitional measures to support transitional service management for those services that the DCC will be offering prior to the commencement of its full service management arrangements?***
***If you do not agree, please explain your rationale.***

Yes. Given the level of services to be provided this seems a sensible approach.

***Question 3: Do you agree that the DCC Licence and SEC should be modified so that updated versions of SEC subsidiary documents may be re-designated by the Secretary of State and incorporated into the SEC?***
***If you do not agree, please explain your rationale.***

We are sympathetic to the proposals. It is right that DECC should seek to find ways to avoid unnecessary bureaucracy to enable decisions to be made, that keep the programme moving forwards and on track.

It is however, not clear what the plan is (or has been) to get subsidiary documents designated under the SEC. In order to avoid similar issues arising elsewhere in the programme DECC should provide a detailed plan of what is expected to be designated and when, so that all programme participants responsible for delivery have a clear understanding of the road map ahead. For example a detailed plan including all milestones required to achieve Initial Live Operations and all elements to be delivered. This will provide all programme participants with a clear understanding of interdependencies, enabling potential pinch points to be truly managed across all parties.