



Smart Energy Code Administrator and Secretariat
Gemserve Ltd
8 Fenchurch Place
London, EC3M 4AJ

Smart Metering Implementation Programme - Regulation
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London, SW1H 0ET

31st October 2014

Dear Sir or Madam,

Re: Consultation on transitional arrangements in the Smart Energy Code

Gemserve, as the Smart Energy Code Administrator and Secretariat (SECAS), welcomes the opportunity to respond to DECC's consultation on the transitional arrangements in the Smart Energy Code (SEC).

As part of the transitional arrangements SECAS has worked closely with DECC, the DCC and industry participants to ensure that the Section T (Testing During Transition) requirements are met. We recognise and value the benefit brought about by clarity in the drafting of the SEC.

Through our discussions regarding the Systems Integration Testing Approach (SITA) and Interface Testing Approach (ITA) Documents we have considered that, whilst the relevant Testing Objectives refer in general to demonstrating that the DCC can comply with the relevant SEC sections, meeting the Objectives needs to take into account factors of good practice to ensure robust criteria are evidenced.

To this end, we would seek clarification that certain testing matters which may not be explicit within the SEC should be integrated into the Approach Documents and should form part of the exit criteria, particularly for the ITA Document; for example, acceptance testing, which would be expected as prudent release management.

We are not requesting that the SEC drafting is revised, only that DECC can confirm this is in keeping with the intent of the Objectives and the requirements for "Good Industry Practice methodology for determining whether or not the ... Testing Objective has been achieved". Providing this clarity will further enable the SEC Panel to discharge its responsibilities for overseeing testing in a manner that is consistent with DECC's intent and provides the appropriate degree of assurance for the SEC.

We look forward to continuing our engagement with DECC, the DCC and the industry and to support the transition of governance from DECC to the SEC Panel. If you would like to discuss this response, please contact

Yours faithfully,

