

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

Your Ref:

May 22, 2014

Dear Sirs

**Consultation on the changes to equipment installation requirements and the governance arrangements for technical specifications**

Northern Powergrid is the electricity distribution (DNO) business for the Northeast, Yorkshire and parts of Northern Lincolnshire, operating through its two licensed subsidiaries, Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc.

We are grateful to the Department of Energy and Climate Change (DECC) for the opportunity to comment on its consultation on the changes to equipment installation requirements and the governance arrangements for technical specifications. Our responses to the specific questions raised in the consultation are set out below along with the rationale that supports our views.

*Q1. Do you agree with our proposed approach and legal drafting for meeting our policy intention of requiring energy suppliers to install DCC provided communications hubs with SMETS 2 meters at domestic premises, and requiring the DCC to provide energy suppliers with CHTS-compliant communications hubs?*

Yes, we agree with the approach and the legal drafting seems fit for purpose. Placing an obligation on suppliers to install SMETS compliant communications hubs as part of an installation is essential to ensure that network operators will be able to access the information from smart meters required to deliver customer benefits. We also agree that it is important for all parties to understand the versions of devices are compatible with each other. When the specifications are revised new devices should be backwards compatible, wherever it is economic for this to be the case, in order to minimise the amount of equipment in a consumer's premises that may need to be replaced as a consequence of replacing one SMS component.

We would suggest a very minor drafting improvement for the definition of a 'Smart Metering System' to be included in Condition 1 of the Electricity Supply Licence, this suggestion is for inclusion of the word 'or' between 'categories' (a) and (b) as per the attached appendix to our letter.

**NORTHERN POWERGRID**

is the trading name of Northern Powergrid (Northeast) Ltd (Registered No: 2906593) and Northern Powergrid (Yorkshire) plc (Registered No: 4112320)

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*Q2. Do you agree with the proposed approach and legal drafting in relation to requirements to comply with the technical specifications for PPMIDs and HICALCS where such devices are installed?*

Yes, we agree with the approach and the legal drafting in Condition 52, 'Smart Metering Systems - Requirements for Specified Optional Equipment', seems fit for purpose in respect of ensuring continued compliance with clear specifications; i.e. compliance with the PPMID Technical Specification and HICALCS Technical Specification.

*Q3. Do you agree with the proposed approach and legal drafting to allow that more than one version of SMETS can be extant in the future? Please provide a rationale for your views.*

Yes, we agree with the approach and the legal drafting to allow for more than one version of SMETS to be in force at any point in time in the future; this seems a sensible way to facilitate a phased transition as new versions of SMETS are developed. We agree that it is important to retain the flexibility to be able to make retrospective changes to SMETS (where economic) particularly where this would help to increase the interoperability between new and already installed equipment.

We also consider that it would be appropriate to try to keep the overlap period, where multiple versions of SMETS are in force, as short as is reasonably possible. Whilst we recognise that Suppliers clearly need a reasonable period of time to transition to installing devices compatible with a new version of SMETS, we would like to see this overlap period minimised in order to ensure that the maximum industry support is given at all times to the latest SMETS versions and also to ensure that Suppliers transition as soon as possible to installing meters with the maximum DNO beneficial functionality.

*Q4. Do you agree with our proposed approach and legal drafting concerning the incorporation of the SMETS into the SEC?*

Yes, we agree with the incorporation of the SMETS into the SEC. We would also support plans for the governance of the GBCS to transfer to the SEC at the same time as that for SMETS.

Please be assured that Northern Powergrid remains committed to supporting the evolution of the technical specifications of the smart metering system, including the GBCS, and the smart Meter Implementation Programme as a whole.

Thank you for the opportunity to respond to this consultation.

Yours faithfully



## Appendix 1: Northern Powergrid's response to the consultation on the changes to equipment installation requirements and the governance arrangements for technical specifications

### Definitions to be added to Condition 1

#### Smart Metering System

means:

- (a) in respect of any Designated Premises, a system installed at such premises for the purposes of the supply of electricity to those premises which:
  - (i) consists of an Electricity Meter and any associated or ancillary devices identified in a version of the SME Technical Specification which is Valid on the Installation Date; and
  - (ii) as a minimum, has the functional capability specified by and complies with the other requirements of that version of the SME Technical Specification; or
- (b) in respect of any Domestic Premises, a system installed at such premises for the purposes of the supply of electricity to those premises which:
  - (i) consists of an Electricity Meter and any associated or ancillary devices identified in a version of the SME Technical Specification which is Valid on the Installation Date;
  - (ii) as a minimum, has the functional capability specified by, and complies with the other requirements of, that version of the SME Technical Specification; and
  - (iii) except where that version of the SME Technical Specification is the first version of that document which was designated on the Smart Metering Designated Date, includes a Relevant Communications Hub (as defined in paragraph 53.15 of standard condition 53 (Technical Specifications)).