



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

SSE
Langstone Technology Park
Building 5000
Havant
Hants
PO9 1SA

Dear sir/madam,

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

On behalf of SSE plc, we are pleased to provide comments on the above consultation. We welcome the ongoing engagement with the Smart Metering Implementation Team and have provided answers to the specific questions posed by DECC in the attached annex.

Please call me if you have any questions.
Yours faithfully



Annex 1: SSE response to consultation on changes to equipment installation requirements and the governance arrangements for technical specifications

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? Please provide a rationale for your views.

SSE agrees with the proposed approach and believes that this is reflected within the current drafting.

Q2 Do you agree with the proposed approach and legal drafting in relation to requirements to comply with the technical specifications for PPMIDs and HCALCS where such devices are installed? Please provide a rationale for your views.

SSE agrees with the proposed approach but has concerns regarding the obligation to maintain the HCALCS where it may no longer be required by the customer or the supplier. We believe this area requires further exploration.

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.

SSE agrees with the proposed approach and believes that this is reflected within the current drafting.

Q4 Do you agree with our proposed approach and legal drafting concerning the incorporation of the SMETS into the SEC? Please provide a rationale for your views.

SSE agrees with the proposed approach to the incorporation of Technical Specifications into the SEC, this aligns with our expectations of these Specifications forming part of the SEC Subsidiary documents. We broadly agree that the legal drafting for ESLC 53.6 and 53.7 and GSLC 47.6 and 47.7 does provide for the incorporation into SEC and the use of the SEC Modification Process. We are satisfied that the definition of Technical Specification will support the relevant documentation and makes explicit that this is reference to the following specifications:

- (a) the SME Technical Specification;
- (b) the IHD Technical Specification;
- (c) the CH Technical Specification;
- (d) the PPMID Technical Specification; and
- (e) the HCALCS Technical Specification.

We seek further clarification to the reference in paragraph 33 of the consultation document to a specific change being required to the roll-out licence conditions. The Proposed Approach and Summary of the Proposed Legal Text does not make reference to these conditions.

We are fully supportive of the use of the SEC Modification Process to manage the onward governance of new versions or amendments to the Technical Specifications. We look forward to early visibility of the associated SEC legal drafting that will enable the transfer of the Technical Specification into the SEC. We note with interest in paragraph 30 of the

consultation document that reference has been made of the amendments being subject to any transitional variations to the SEC Modification process set out in Section X of the SEC. We seek further clarification on the continuance of these variations and how this would support a robust Modification Process in respect of the Technical Specifications.

General comments on licence drafting

These comments reference the electricity supply licence condition numbering but are equally applicable to the equivalent gas supply licence conditions.

On reviewing the drafting of the Licence Conditions, and in particular the new conditions of SLC 53 Technical Specifications, SSE was surprised at the content and its detail, which we found to be overly prescriptive for the purpose of licence conditions. We would have expected the requirements for the Installation Validity Period, Identification by Reference and Maintenance to be set out in the SEC, as these relate to SEC Subsidiary Documents. Based on our experience with other Industry Codes we would have expected an overarching high level condition that would have provided the necessary hook into the Governance Code.

49.4 (c) SSE welcomes the clarification that the HAN must extend to at least one part of the relevant premises (as further defined).

49.4 (d) Mandates that we establish a connection to all requested Relevant Consumer Devices. We assume these must be located within the area defined in 49.4 (c) but suggest the drafting is extended to remove any ambiguity.

50.13 Definitions

Supplier Transfer has the meaning given to it in standard condition 14A (Customer transfer blocking). –

We believe this should read 'Customer Transfer', not 'Customer Transfer Blocking' (Condition 14A is 'Customer Transfer' and provides the definition of 'Supplier Transfer', whereas Condition 14 is 'Customer Transfer Blocking' and does not provide a definition of 'Supplier Transfer').