Data Communications Company

Smart Metering Implementation Programme

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

22 May 2014

1 Introduction

DCC is pleased to respond to the following SMIP consultation:

- ***Changes to equipment installation requirements and the governance arrangements for technical specifications.***

If you have any questions regarding these responses please address them to:

2 DCC Response

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*
A1	DCC agrees with the proposed approach. The needs of consumers and the Smart Meter Implementation Plan are best met by deployment of DCC-provided communications hubs. Allowing energy suppliers to widely deploy CHTS-compliant communications hubs that are not provided by DCC could have negative impacts, since these devices will not be capable of connecting to the SMWAN service. Non-SMWAN communications technologies may not meet security requirements. No current model exists for non-DCC distribution of firmware verification of critical Communications Hub commands, for example: • underlying communications service contracts for non-DCC hubs are unlikely to match coverage performance provided by DCC SMWAN; • high volumes of deployed, non-DCC hubs may actually erode DCC SMWAN coverage by precluding the CSPs from implementing coverage enhancing local solutions (mesh and 'buddy mode'); and • the process for managing and resolving non-DCC communications hub failures after a Change of Supplier is not defined and is likely to drive unnecessary hub replacement costs.
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.*
A2	DCC agrees with the proposed approach. Including the requirement for PPMIDs and HCALCS to comply with technical specifications will help to prevent unnecessary cost if such devices needed to be swapped out following a Change of Supplier. Adherence to technical standards should mean that they are capable of being deployed and managed in a consistent way. Such devices also need to comply with GBCS and the associated security model as their function is capable of impacting consumers' energy supply.
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.*
A3	DCC agrees with the proposed approach, with the reservations outlined below. At the start of Smart Mater deployment, there is a potential risk if multiple versions of SMETS can be extant for an extended period. Whilst some time should be given to energy suppliers to manage the run-down of stock of SMETS1 devices, the time allowed should be minimised. Otherwise, extended roll-out of equipment that does not include DCC communications hubs may lead to SMWAN coverage issues and would not support the otherwise stated intention to require SMETS2 meters to be installed wherever reasonably possible.

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.*
A4	Whilst DCC agrees with the approach in that SMETS should be incorporated into the SEC, it is with the caveat that this is done only once GBCS becomes a formally designated technical standard and has been proven through testing. This will mitigate the risks inherent in using the SEC modification process to resolve any issues that may arise either as a result of protocol testing or the EU notification process.