



Trilliant response to

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

Consultation Question 1.

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.

Trilliant agrees with the proposed approach

Consultation Question 2

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.

Trilliant agrees with the proposed approach

Consultation Question 3

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.

Trilliant mostly agrees with the proposed approach, as a phased move from SMETS1 to SMETS2 is favourable to an overnight switch, and the logistical challenge that presents.

In terms of the notice period given by the secretary of state before the effective date of SMETS1 installs no longer counting towards rollout totals, we would prefer this period to be as long as possible to ensure that pre-existing manufacturing commitments can be met, and that energy suppliers are subsequently able to effectively dispose of their SMETS1 stock through installation.

Paragraph 28 proposes that any version of a technical specification may be updated for maintenance reasons without giving rise to an entirely new version. New installations will have to comply with the updated version at the time that they are *installed*. This should be compliance with the specification at the time of *manufacture*. So long as there is not a full new version of the technical specification, Equipment is likely to be stored in-situ for a variable and possibly considerable length of time. By the time of installation, the technical specification to which it complied at manufacture may have changed. There is no effective way of updating equipment to the latest specifications whilst the equipment is being held in storage. Please take this process into account in your writing of the legal text.

Paragraph 29 proposes that any version of a technical specification which is already installed, may need to be reconfigured or modified in order to comply with the updated provisions, where necessary. This is not practical, as it could backdate a number of years to an older specification – compliance would have to be reviewed on a case by case basis, as it may not be possible to modify the old specification to a new requirement based on the available system knowledge, system resources and system capabilities.