

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

14 February 2014

Dear Sirs

**Smart Metering Implementation Programme:
Consultation on New Smart Energy Code Content (Stage 3)**

Thank you for the opportunity to respond to the Smart Metering Implementation Programme ("SMIP") consultation in respect of the Smart Energy Code ("the SEC"). The Appendix to this letter provides detailed responses to specific questions as set out in the consultation document.

Xoserve is not an entity regulated by Licence, nor is it a signatory to any GB energy industry Codes. We have, however, been appointed by the principal Gas Transporters ("the GTs") as their Central Agent, with responsibility for discharging the GTs' Licence and Uniform Network Code obligations in respect of transportation transactional services. We refer to these regulated services collectively as "Agency Services". In addition, we are expecting that the GTs and the independent Gas Transporters ("the iGTs") will formally nominate Xoserve as their Registration Data Provider ("RDP") under the SEC.

Our response is concerned with proposals in respect of the Smart Metering Key Infrastructure ("SMKI") (Chapter 3) and DCC Testing (Chapter 5). Whilst we largely support the proposals, we are particularly keen to ensure that there is greater clarity of the role and responsibilities of the RDPs, and that the requirements that are placed upon them are proportionate to their role in the Smart Metering regime.

We are continuing to participate extensively in a number of the SMIP design bodies within the SMIP Transition Governance Framework, including the Registration Data Provider Forum, in order to ensure that we understand fully the requirements on Xoserve in its future capacity as an RDP, and have in place a planned systems change programme that will ensure the on time delivery of robust solutions to support the establishment and operation of the DCC.

We are keen to continue to support the SMIP as it moves forward, and would be happy to meet with members of the DECC Smart Metering Team to discuss in more depth any of the matters raised in our response.

We are happy for you to publish this letter and the supporting Appendix. If you would like to discuss further any aspect of our response, please contact
on

Yours faithfully

**SMART METERING IMPLEMENTATION PROGRAMME
CONSULTATION ON NEW SMART ENERGY CODE CONTENT (STAGE 3)**

APPENDIX: DETAILED RESPONSES TO QUESTIONS

Question 3: Do you agree with our proposed approach and text for the SEC with respect to provision of the SMKI Service? Please provide a rationale for your views.

We broadly support the approach outlined in Section 3.3 of the consultation document that would require the DCC to provide an SMKI Service for both Organisations and Devices. However, we would propose that the SMKI provisions should not be made to apply in full to RDPs. In its capacity as an RDP, Xoserve does not expect to communicate directly with a Smart Meter, and would therefore propose that a tailored set of SMKI requirements that are applicable to RDPs only would be an appropriate and proportionate arrangement. This would also have the benefit of avoiding the need to commit financial and manpower resources to the development and implementation of a full SMKI solution into Xoserve systems and processes.

Question 21: Do you agree with our proposed text for the SEC with respect to Test Phasing, consistent with our decisions on testing arrangements detailed in our recent consultation response? Please provide a rationale for your views.

We broadly support the proposed DCC Testing approach, and we welcome the explicit inclusion of the RDPs within the scope of the planned testing phases, particularly Systems Integration Testing ("SIT") and Interface Testing ("IT").

We note that there would be particular requirements on the DCC to prepare SIT and IT Approach documents, the former being in direct consultation with the RDPs. We are fully supportive of this approach, and would welcome the opportunity to have early sight of draft documentation.

In relation to User Entry Process Testing, we would propose that the outlined requirements for DCC Users are tailored for RDPs. Without an appropriate customisation of requirements, Xoserve will be required to commit unnecessary financial and manpower resources to the development and execution of User Entry Process Tests.

Question 24: Do you agree with the need for an issue resolution process in testing? Does the proposed process meet that need? Please provide a rationale for your views.

We support the need for an issue resolution process during testing. We agree that it is appropriate to establish prior to the commencement of testing:

- a) The rights and responsibilities of Testing Participants;
- b) The role of the DCC in respect of support to Testing Participants;
- c) Arrangements for the communication of Testing Issues by the DCC to Testing Participants;
and
- d) Clearly defined routes for the escalation of Testing Issues.