**SP ENERGY NETWORKS**

Regulation & Commercial

By e-mail

Smart Metering Implementation
Programme
Department of Energy & Climate Change
3 Whitehall Place
London
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Your ref

Our Ref

Date
14<sup>th</sup> Feb 2014

Contact / Extension

Dear Colleague

**A Consultation on New Smart Energy Code Content (Stage 3)**

I am writing on behalf of SP Energy Networks in response to the above consultation paper issued on 16<sup>th</sup> December 2013. We welcome the opportunity to comment on the points raised.

I hope that this response is helpful, but please contact me if there are any queries

Yours sincerely

A Consultation on New Smart Energy Code Content (Stage 3)
Detailed comments by SP Energy Networks, February 2014

**Question 1: Do you agree with our proposed approach and text for the SEC with respect to the Policy Management Authority? Please provide a rationale for your views.**
- We would seek clarity on liabilities and actions if the PMA suspends access to the SMKI service. For example, should our regulatory reporting be dependent on smart meter information will Ofgem be required to take into account the actions of the PMA in suspending access to this information.
- In addition, we would seek further clarity on when the SMKI SEC document set will be available

**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 would seek some clarity on how we communicate with the SMKI service and repository i.e. is this over one of our existing RDP or user gateway interfaces. If this is over a new communications mechanisms when will this be defined.

**Question 4: Do you agree with our proposed approach and text for the SEC with respect to SMKI Assurance? Please provide a rationale for your views.**
- We would seek clarity on the scope and applicability of sanctions for non-compliance and hence, would like confirmation on the availability of the compliance policy
- We believe all SMKI users must be subject to the same requirements and that dispensations are not introduced based on organisation / customer-base size
- We would also express our concern at the short timescales for the appointment of the PMA and development of all supporting assurance documentation

**Question 8: Do you agree with our proposed approach for the SEC with respect to Liabilities, Warranties and Indemnities? Please provide a rationale for your views.**
- We agree with this approach providing recovery processes do not require site visits.

**Question 9: Do you agree with our proposed approach and text for the SEC with respect to the SMKI Repository? Please provide a rationale for your views.**
- The detail required to allow us to fully understand the operational practices and procedures that will support the SMKI Repository is not yet available
- Should some form of escrow be in force regarding the SMKI repository to recover from data loss or trading cessation?

**Question 11: Do you agree with our proposed approach and text for the SEC with respect to SMKI and Repository Testing? Please provide a rationale for your views.**
- We agree with the proposed approach. We would reiterate our concerns that sufficient time is made available between test and go-live to rectify issues.

**Question 16: Do you agree with our proposed approach and text for the SEC with respect to the Location of System Controls? Please provide a rationale for your views.**

- Whilst we agree with this principal we would seek clarity on whether DNO are considered to have access to supply-affecting service requests. We would consider this not to be the case.

**Question 18: Do you think that it is important that MOPs / MAMs are able to access DCC services directly? Please provide a rationale for your views.**

- We believe that fully opening DCC services to MOP/MAMs increases the risk footprint..

**Question 19: Do you have any views on the possible options identified for MOPs / MAMs to access DCC services? Please provide a rationale for your views.**

- Where a service can be provided by an existing connection this connection should be used. Option 1 is preferred

**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 would seek clarity on how the phasing and dependencies will work when testing is carried out by multiple parties in multiple regions i.e. different CSP.
- Whilst we agree it is prudent to ensure some form of network operator user interface testing, the current approach to the obligation for DNO to be ready for testing adds significant uncertainty to our plans and we would request clarity as to how and when this requirement on us can be activated
- We anticipate the production and approval of tests scripts may take a significant amount of time, particularly when carried out in parallel with other users. We would raise a concern that enough time is allocated to complete this process.
- Overall, we request more clarity on the specifics of timing i.e. how much notice is required to participate in testing, etc.

**Question 23: Do you agree with the proposed approach to include the Projected Operational Service Levels within the SEC? Please provide a rationale for your views.**

- We agree with this approach as we believe it will be beneficial for the ongoing operation of the system.

**Question 25: Do you agree with our proposed text for the SEC with respect to Issue Resolution? Please provide a rationale for your views.**

- We would question the security vulnerabilities of posting unresolved testing issues on a website
- We would question the lack of independent vetting of the appeals process