Smart Metering Implementation Programme
Regulation Team
Department of Energy and Climate Change
3 Whitehall Place
London
SW1A 2AW

Inveralmond House
200 Dunkeld Road
Perth
PH1 3AQ

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Consultation on further changes to the Smart Energy Code

We are pleased to provide comments on the above consultation on behalf of the following licensees:

- SSE Energy Supply Limited
- Southern Electric Gas Limited
- South Wales Electricity Limited
- SWALEC Gas Limited
- Scottish Hydro Electric Power Distribution plc
- Southern Electric Power Distribution plc

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.

We look forward to the timely conclusion and designation of content for the SEC Stage 4 Part B.

Please call me if you have any questions.

Yours sincerely

Annex – Consultation Questions

Additional Public Key Infrastructures and SMKI-related changes

1. Do you agree with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure?

We are in agreement with the approach and proposed legal drafting.

2. Do you agree with the proposed approach and legal drafting in relation to DCC Key Infrastructure?

We are in agreement with the approach and proposed legal drafting, given that not all the SMKI obligations are duplicated for DCCKI, in particular where the SEC Panel's role is that of reviewer not approver and where the DCC does not have to formally consult with SEC Parties for DCCKI documents.

We wonder whether the new DCCKI definition set out in Section A: Definitions needs to be moved between "DCC IT Testing and Training Systems" and "DCC Licence" to aid the reader.

3. Do you agree with the proposed approach and legal drafting in relation to allowing RDPs to become Authorised Subscribers for Organisation Certificates?

We agree with the principles that are being defined in the legal draft. However as RDP, we have concerns that the controls will be proportionate and relevant, as this covers an existing Industry Registration process.

DECC referenced the use of "RDP ID" in E2.15, however we cannot see the defined term being used in Section E: Registration Data. We therefore seek clarification that this does not affect the intent of obligations of the DCC towards the RDP.

4. Do you agree with the proposed approach and legal drafting in relation to the checks the DCC must apply when deciding if a Subscriber is an Eligible Subscriber?

We are in agreement with the approach and proposed legal drafting.

5. Do you agree with the proposed approach and legal drafting in relation to the size restrictions on a number of fields in Device and Organisation Certificates?

We are in agreement with the approach and proposed legal drafting, it would seem sensible to limit the field sizes on both Device and Organisation Certificates respectively to enable them to fit inside the Zigbee packet.

6. Do you agree with the proposed approach and legal drafting in relation to the clarified Independent SMKI Assurance Scheme?

We are in agreement with the approach and proposed legal drafting.

Security-Related requirements & Post Commissioning Obligations legal drafting

7. Do you agree that the proposed changes are necessary and proportionate to protect DCC systems?

We are in general agreement with the principles of the approach and proposed legal drafting however; we continue to have some concerns on the interpretation of these definitions and the subsequent assessments of Users Systems, based on the proportionality of risk.

As RDP, whilst we accept in principle the requirements for standardised security controls, RDPs already have an existing systems architecture that supports their role and meets the current industry requirements. The 'expansion' of controls and 'extension' of systems definitions will place additional requirements on RDPs, incurring costs and timescales for delivery to meet these requirements; RDPs are likely to incur substantial costs and timescales to achieve this.

8. Do you agree with the proposed changes to the post commissioning obligations and associated limitation of liabilities?

We believe that the heads of loss for a breach of clauses M2.7 and M2.8 should not be pre-determined and the losses for consequential and indirect loss should be excluded from the liabilities in M2.9. The drafting should therefore be amended to reflect this position. The standard liability cap should cover the losses in M2.8. SSE can not quantify what losses the other DCC parties may suffer and should not be held liable.

9. At what point should the Recovery Key on a meter be validated?

We believe that there should be opportunity to validate the Recovery Key on a meter either prior to or during installation.

Movement of some Technical Arrangements into Subsidiary Documents and Providing for Some SEC Milestones to be turned into Dates

10. Do you agree with the proposal to move four sections of the SEC (H4, H5, H6 and O3) from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this?

We are in agreement with the principle of the proposed approach and legal drafting. However we seek sight of the proposed legal text associated with O3, to ensure we are in agreement with the text for this section.

11. Do you agree with the proposed approach to amending the legal drafting to provide for the Secretary of State to direct that an activity is required to be carried out in advance of a specified date instead of a milestone?

We are in agreement with the principle of the proposed approach and legal drafting, as an actual date will clarify SEC Party obligations start date.

Test Services to Support System Providers and Shared Systems, and possible DCC Gateway Connection Requirements for Remote Testing

12. Do you agree with the approach and proposed legal drafting supporting Parties undertaking tests equivalent to UEPT and SREPT on their own account?

We are in agreement with the approach and proposed legal drafting.

13. Based on our understanding of the DCC's remote testing offering, it may be that a DCC Gateway Connection is required, which would mean that remote testing would only be available to SEC Parties. We welcome views from prospective testing participants on the impact this may have on their plans.

We are of the understanding from discussions with DCC that there are two different types of remote testing that can be undertaken, either by connection with the CSP or with the DSP.

We believe that it is clear that an organisation involved with testing would need to be a SEC Party to use its own remote test lab for metering devices; however a nano- or femto-cell may be required to get WAN coverage to the CSP.

As to the need for a Gateway Connection to the DCC, we note that the DCC describe in the End-to-End Test Approach document a *Service User Emulator*. We are of the understanding that this would allow Test Houses, such as those involved in SMDA, to send Service Requests without needing a DCC Gateway Connection. We believe that this would be acceptable, so long as this is available as expected to SMDA and its Test Houses.

This capability would need to be confirmed by DCC with clarification that the *Service User Emulator* is accessible without a DCC Gateway Connection, that any organisation using it would not have to be a SEC Party, and that it would be available to SMDA Test Houses.