

bringing energy to life



Smart Metering Implementation Programme -  
Regulation Department of Energy & Climate Change  
Orchard 3, Lower Ground Floor  
1 Victoria Street  
London,  
SW1H 0ET

Tuesday 30<sup>th</sup> December 2014

Dear Sir/Madam

Re: Consultation on additional Smart Energy Code  
(SEC) content.

I am writing in response to the transitional arrangements in the  
Smart Energy Code (SEC) and the additional SEC content.

Please see the table on the second page with responses to the questions  
from the consultation.

Warm regards

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Question		Spark Response
1	Do you agree with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure?	Spark agrees with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure.
2	Do you agree with the proposed approach and legal drafting in relation to DCC Key Infrastructure?	Spark support the proposed approach and legal drafting in relation to DCC Key Infrastructure.
3	Do you agree with the proposed approach and legal drafting in relation to allowing RDPs to become Authorised Subscribers for Organisation Certificates?	Spark agrees with the proposed approach and legal drafting in relation to allowing RDPs to become Authorised Subscribers for Organisation Certificates.
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?	Spark agrees 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
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?	Spark agrees with the proposed approach and legal drafting in relation to the size restrictions on a number of fields in Device and Organisation Certificates.
7	Do you agree that the proposed changes are necessary and proportionate to protect DCC Systems?	Spark supports that these proposed changes are necessary and proportionate to protect DCC Systems.
8	Do you agree with the proposed changes to the post commissioning obligations and associated limitation of liabilities?	Spark agrees with the proposed changes to the post commissioning obligations and associated limitation of liabilities.
9	At what point should the Recovery Key on a meter be validated?	No comment.
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	Spark agrees with the proposal to move four sections of the SEC from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this.

	accommodate this?	
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?	Spark agrees 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.
12	Do you agree with the approach and proposed legal drafting .	Spark agrees with the approach and the proposed legal drafting.