

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

22 May 2014

Dear Sirs

Consultation on Changes to Equipment Installation Requirements and the Governance Arrangements for Technical Specifications

Thank you for the invitation to respond to the above consultation. As you are aware, Good Energy is a unique small electricity and gas supplier, as we only supply customers with 100% renewable electricity predominantly purchased from decentralised generators, and gas which supports renewable heat. It is our mission to provide a blueprint for the UK to transform itself to a low carbon, 100% renewable economy through the work that we do and the actions of our customers and renewable generators.

For your ease, we reference the specific questions within the consultation to which we have responded.

Q1: 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.

Good Energy agrees with the proposal to obligate the DCC to make all communications hubs available to suppliers both compliant with the CHTS version in operation at the time and compatible with SMETS V2 devices.

Q2: 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.

Good Energy agrees with this in principle and from the customer experience perspective.

However, Good Energy has concerns regarding the cost implications of supporting such devices as specifications change over time, especially as we understand there is no DCC support for upgrading the firmware of such devices. Good Energy is of the opinion that the technical and cost implications of the obligations, as drafted, have not been fully considered.

Q3: 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.

Good Energy is of the opinion that this is a pragmatic approach and avoids the cost and operational implications of supporting a single version of SMETS. However, there will be significant complexity implications that must be taken into account in end-to-end processes. Good Energy proposes that such

complexities should be minimised, by avoiding changes to the SMETS specifications during the mass roll-out.

Q4: Do you agree with our proposed approach and legal drafting concerning the incorporation of the SMETS into the SEC? Please provide a rationale for your views.

Good Energy believes this proposal makes sense as it aligns change management between the SEC and SMETS.

Kind regards,