

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

By email only to: smartmetering@decc.qsi.gov.uk

21 August 2015

Dear Sirs

Smart Metering Implementation Programme – new Smart Energy Code content and related Supply Licence amendments

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three licensed distribution companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. The content of our response is not confidential and can be published on the DECC website.

We have provided answers to the consultation questions in the appendix to this letter and hope that you will find our comments helpful. If you have any questions, please do not hesitate to contact me.

Yours faithfully

Copy

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Appendix

Smart Metering Implementation Programme – new Smart Energy Code content and related Supply Licence amendments

DCC Enrolment Mandate

Question 1: Do you agree with the legal drafting of the proposed amendment to the electricity and gas supply licence conditions? Please provide a rationale for your views.

We have no comments on the legal drafting.

Question 2: Do you agree that this legal duty should take effect when DCC's enrolment services are first available?

Yes, we agree that this legal duty should take effect when DCC's enrolment services are first available. This will benefit:

- Network Operators who will be able to send and receive data to enhance customer service and incorporate into planning and smart grid models; and
- customers and their agents who will be able to access the full range of services set out in the Smart Energy Code (SEC).

It will also minimise the number of smart meters that need to be migrated to DCC services.

DCC Enrolment and Communication Services

Question 3: Do you have any comments on the proposed drafting in these new subsidiary documents?

We have no specific feedback at this stage, but would welcome the opportunity to comment on the final draft text, when available.

Question 4: Do you have any specific comments on the proposed revised approach to dealing with Post-Commissioning Obligations including the proposal to delete Sections M2.7 and M2.8?

We note that in the previous drafting, Parties suffering losses from any breach would be able to recover their costs without limitation. It is not clear from the revised drafting if a Network Party would be able to recover losses, for example, in the event that a Supplier persistently failed to put the correct Network Party certificate on a meter. We would appreciate clarity on this point.

Consent for joining and un-joining Consumer Access Devices

Question 5: Do you have any comments on the proposed approach?

We have no comments on the proposed approach as we do not perceive an impact on Network Parties.

Consequential changes to Sections F2, G, M2 and A

Question 6: Do you have any comments on the proposed drafting changes to Sections F2, G, M2 and A?

We have no comments on the proposed drafting changes.

Question 7: Do you agree with the proposal to move some of the technical details in F2 into a subsidiary document in line with the approach taken in relation to Sections H4, 5 and 6?

Yes, we agree with this proposal. We are supportive of the principle that technical details should be contained in SEC subsidiary documents rather than the SEC.

SEC amendments to support Smart Metering Testing

Question 8: Do you support the proposed changes to Section T to ensure that the testing objectives reflect a more up to date version of the SEC?

Yes. We are supportive of the proposed changes and of the ongoing work to develop the baseline documentation that will enable SEC Parties to finalise their testing plans and test documentation.

Question 9: Do you agree with the proposal that the DCC should offer a testing service for prospective Non-Gateway Suppliers?

We agree that the Non-Gateway Interface must be tested and therefore a test instance should be made available. The provision of such a service should be in proportion to the criticality of the service being offered, to ensure that additional industry costs remain under control.

Question 10: Do you intend to test only Devices (and not User Systems) against the DCC Systems? If so, how and when do you intend to do this? Is it your intention to: become a SEC Party and establish a DCC Gateway Connection; rely on other parties to interact with the DCC for the purposes of testing Devices; or another means (e.g. direct connection without being a SEC Party)?

As a SEC Party, UK Power Networks intends to test User Systems against the DCC Systems.

With regards to the participation in testing of non-SEC Parties, we are supportive of the proposal to remove the requirement on the DCC to provide testing services to these parties, as this will streamline the testing process. An organisation that intends to test only Devices may accede to the SEC or collaborate with a SEC Party.

Public Key Infrastructure

Question 11: Do you agree with the proposals, and associated legal drafting in relation to the SMKI Recovery Procedure Guidance document? Please provide a rationale for your view.

We agree that it may be beneficial to decide not to use the Contingency or Recovery Key. We also agree that the SMKI PMA is the correct governance body to make that decision. In the interests of an open approach to such a potentially costly decision, we agree with the proposals and legal drafting in relation to the SMKI Recovery Procedure Guidance document.

Question 12: Do you agree with the proposed drafting on how changes to the SMKI Recovery Key Guidance are managed, or do you think it should be a SEC Subsidiary Document and open to the SEC modification process? Please provide a rationale for your response.

We support the general principle that wherever possible, documents are subject to the SEC modification process. This provides visibility and encourages SEC Parties' engagement in change. However, for this type of document, we believe that the change process proposed in the consultation (see paragraph 73) provides a suitable level of governance.

Question 13: Do you agree with the proposals, and associated legal drafting in relation to the SMKI Recovery Procedure Liabilities? Please provide a rationale for your view.

Yes, we agree with DECC's proposal and the associated legal drafting. These provide clarity in respect of when costs may be recovered and the process to be followed.

Question 14: Do you agree with the proposals, and associated legal drafting to use IKI for communications over the NGI and in relation to TAD? Please provide a rationale for your view.

Yes, we agree with this change. The original intention of the IKI was to allow communications over the NGI and in relation to TAD.

Question 15: Do you agree that it is necessary for the PMA to be able to require Parties to nominate Key Custodians? Please provide a rationale for your response.

Yes, we agree that it is necessary for the PMA to be able to require Parties to nominate Key Custodians. There is a risk that Parties will not volunteer, as they may perceive the commitment to be too onerous.

Question 16: Do you agree with the proposals, and associated legal drafting to make clarificatory changes to the SMKI Certificate Policies? Please provide a rationale for your view.

We agree with the alignment of the Certificate specification with industry standards and with the other minor modifications to the policies. However, we would require additional expertise in certificate formatting specifications in order to comment on the accuracy of the specifications.

Question 17: Do you agree with the proposals, and associated legal drafting to allow the DCC to become an Eligible Subscriber for certain SMKI Organisation Certificates for the purpose of signing Registration Data? Please provide a rationale for your view.

Yes. We appreciate the need to provide secure communications for RDP data and the proposed approach is a sensible way to achieve this.

Question 18: Do you agree with the legal drafting to oblige Network Operators to establish their Organisation Certificates prior to DCC Live? Please provide a rationale for your view.

We support the intent of the legal drafting which requires Network Operators to establish Organisation Certificates prior to the start of Enrolment Services. However, it is not clear how far in advance of Enrolment Services the Organisation Certificates should be established. We would appreciate clarity on this point.

Question 19: Do you agree with the proposal and legal drafting in relation to the miscellaneous changes to the PKI content? Please provide a rationale for your view.

We broadly agree with the miscellaneous changes to the PKI content, on the basis that these align with the programme development. We have no comments on the amendments to provision L8.7, regarding Device Certificate Subscribers, as Network Operators do not expect to request Device Certificates.

Security Independence Requirements

Question 20: Do you have any comments on the proposed drafting regarding the CIO independence requirements?

We support the principle of the CIO demonstrating independence and the role of the SEC Panel. We also recognise that the SEC Panel may need to appoint another person to perform the role of the CIO. It is our view that the proposed drafting supports these requirements.

Re-use of previously installed Communications Hubs

Question 21: Do you agree with the proposals, and associated legal drafting (including the proposed changes to the CHISM at Annex D), which would permit Suppliers to re-use Communications Hubs that they have removed from consumer premises in certain circumstances?

We have no comments on the proposed change as Network Operators are not involved in this process.

Obligation for Energy Suppliers to engage with DCC queries on compliance with the Communications Hubs Support Materials

Question 22: Do you agree with the proposal, and associated legal drafting, for an obligation for Supplier Parties to respond to any reasonable request from the DCC for information pertaining to compliance with the CH Support Materials and for a reciprocal obligation to be placed on the DCC?

We have no comments on the proposed change as Network Operators are not involved in this process.

Question 23: Do you agree with the proposals, and associated legal drafting (including the proposed changes to the CHISM at Annex D, relating to visits by the DCC to consumer premises)?

We have no comments on the proposed change as Network Operators are not involved in this process.

Failure of Parties to accept delivery of Communications Hubs

Question 24: Do you agree with the proposal, and associated legal drafting, for Parties to be liable for all reasonable costs and expenses incurred by the DCC as a result of a delivery of Communications Hubs being prevented from taking place in accordance with the SEC, due to a breach of the SEC by that party?

We have no comments on the proposed change as Network Operators are not involved in this process.

Consequential changes to the SEC for alignment with the Communications Hub Support Materials

Question 25: Do you agree with the proposals and associated legal drafting for the consequential changes to the SEC arising from the Communications Hub Support Materials?

We have no comments on the proposed change as Network Operators are not involved in this process.

Miscellaneous Communications Hub Issues

Question 26: Do you agree with the proposals as described under the heading of "Miscellaneous Communications Hub Issues" above and the associated legal drafting?

We are supportive of the proposals as they clarify the issues addressed during the commissioning process.

Incident Management

Question 27: Do you agree with the proposed changes to Incident Management? Please provide a rationale for your views.

Yes, we agree with the proposed changes. A single Incident Management process should benefit all Incident Parties and the DCC.

Governance of Error Handling Strategy

Question 28: Do you agree with the proposed approach to provide more flexible governance for the Error Handling Strategy, set out above?

Yes, we agree with the proposed approach. Aligning the documentation will provide clarity for Parties on the activities they need to undertake when dealing with errors.

Further Activation of the SEC Modification Process

Question 29: Do you agree with the proposals in relation to the timing of the further activation of the SEC Modification Process? Please provide a rationale for your response.

Yes. The proposed approach moves in a controlled manner towards the point at which the SEC Panel takes full control of the modification process.

Question 30: Do you agree with the proposals and legal text in relation to the manner in which the SEC Modification Process is further activated, including the temporary performance of certain enduring Authority functions by the Secretary of State? Please provide a rationale for your response.

With the exception of one point (see below), we agree with the proposals and legal text in relation to the manner in which the SEC Modification Process is further activated. The changes provide clarity in respect of the Interim Modification Process. Furthermore, we support the temporary role assumed by the Secretary of State to prevent dual governance (by the Authority and the Secretary of State).

We propose that the Secretary of State should no longer have the powers to suspend or cancel Modification Proposals. The DCC should be suitably resourced to carry out impact assessments, and those impact assessments, together with reports from the SEC Panel, should allow the Secretary of State to reach an informed decision.

Scope of the Threshold Anomaly Detection Procedures document

Question 31: Do you have any comments on the proposed drafting regarding the scope of the Threshold Anomaly Detection Procedures?

We have no comments on the proposed change.

Appeals of Panel decisions relating to SMETS non-compliance

Question 32: Do you agree with the proposed additional text to F3 to provide affected Supplier Parties or the DCC with the ability to appeal (to Ofgem) SEC Panel decisions relating to device non-compliance with the Technical Specifications and any associated remedial plan?

Yes, we agree with the proposed additional text.

Section A Definitions

Question 33: Do you agree with the proposal, and associated legal drafting in relation to amending the definitions in preparation for the future introduction of technical specifications into the SEC? Please provide a rationale for your view.

Yes, we agree with the proposed change. This should improve the clarity of the SEC and related documents.