

Smart Energy Code SMKI PMA Chair
Smart Energy Code Company
8 Fenchurch Place
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Smart Metering Implementation Programme – Product Delivery
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
London, SW1H 0ET

11th August 2015

Dear DECC,

**RE: A Consultation on New Smart Energy Code Content and Related Supply Licence
Amendments – July 2015 - URN 15D/340**

The SMKI PMA welcomes the opportunity to respond to DECC's July 2015 consultation on new Smart Energy Code (SEC) content and related supply licence amendments. This response from the SMKI PMA is from the governance role of a SEC Panel Sub-Committee and assumes that SEC Parties will provide their own views on the specific requirements set out in the consultation document.

The SMKI PMA note the potential proposals for the SMKI Recovery Procedure Guidance document however, the members unanimously agree that its preferred position is to retain editorial control of the document rather than it be a SEC Subsidiary Document owned by industry. The members acknowledge the need for Parties to review the content of the document and propose that this would be achieved through consultation with the wider SEC community during its initial development and subsequent amendments.

The SMKI PMA also note the proposal that the SMKI PMA may require any Party to nominate Key Custodians for the construction of the Recovery and Contingency Keys. It may be more prudent for the SEC to contain an obligation for Parties to nominate Key Custodians. Members noted that Parties may find this obligation useful in internal discussions on the practicalities of nominating an individual, in terms of availability and remuneration.

With regards to the DCC using live certificates for the Operational Acceptance Testing, the SMKI PMA supports the suggestion of its involvement.

If you would like to discuss how the SMKI PMA may further contribute towards the development of this document, please contact smki@secc.co.uk alternatively,

Yours sincerely,

Accommodated by

