

17 October 2016

Smart Metering Implementation Programme
Product Delivery Team
Department for Business, Energy and Industrial Strategy
3 Whitehall Place
London,
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By email only

Dear BEIS colleague,

With regards to the recent consultation on Smart Energy Code and Licence Amendments (September 2016), Utilita Energy has reviewed the proposals and would like the following responses to be noted. As a predominantly prepayment smart energy supplier, we have identified certain areas within the following proposals that require further clarification by BEIS.

Q1) Do you agree that the legal drafting implements reactive I&L policy as proposed? Please provide a rationale for your views.

Broadly yes, however we feel that there should be a prioritisation of DCC SM WAN incident resolution for customers wishing to operate in prepayment mode. If the customer is left in credit mode until the SM WAN is available (DCC has a 90 day SLA to achieve this), they will potentially accrue energy bills which they may struggle to pay.

We feel that it would be advantageous to the success of the SMIP if there were customer focused literature available which explains in plain English the impact of no SM WAN availability upon installation. This could be a DCC authorised publication, ensuring that all energy suppliers are sending a uniform message to consumers. It could explain at the same level what the potential implications are of having a reactive install and leave installation in the case of SM WAN unavailability.

In addition to this, we would like to reiterate that we feel that the constraints of SMETS2 technology with regards to an installation carried out in a no SM WAN situation is of detriment to the end customer. UTRNs are only used in SMETS2 for top ups in a no SM WAN scenario, however currently our engineers are able to fully install a customer with a SMETS1 meter in a no WAN situation - using 40 and 60 digit UTRNs to provide a variety of functions, such as loading the tariff and pricing details. Ultimately this links back to our initial point, whereby customers wishing to operate in prepayment mode should be placed on a priority list by the DCC to obtain SM WAN at their property, thus

ensuring that the correct payment mode and tariffs can be applied to the meter, thus preventing potential accrual of debt.

It is also important to note that suppliers are required to load their SMKI credentials onto the meter within 7 days following a change of supply. If the customer has only recently been installed and was subject to reactive install and leave, potentially the customer could change supplier before the SM WAN is established (given that the DCC has a 90 day SLA to establish SM WAN once the incident is raised), thus meaning that the supplier has not had the opportunity to load their SMKI credentials onto the meter. This process would cause the losing supplier to not receive any payment for energy used within this time before the supply is lost to the gaining supplier.

Q2) Do you agree with the proposed approach for the implementation of proactive I&L for new connections and replacement meters? Please provide a rationale for your views.

Yes we agree this in principle. However we would like to highlight that as a smaller supplier, we are using an adaptor service to operate with the DCC. A consequence of this is that we have no direct access to the SSI (the Self Service Interface of the DCC), and as such feel that it would be fair to extend the validity period of the Coverage Checker date in order to provide a longer lead time to book in installations (3 months instead of 30 days – this would align to the SLA that DCC has to establish SM WAN in a no SM WAN situation).

With the increasing pressure to have completed the smart meter roll out by 2020, access to the coverage data with a longer timescale would enable suppliers to plan installations, including possible proactive install and leave installations, with greater accuracy.

Q3) Do you agree that the legal drafting implements proactive I&L policy as proposed? Please provide a rationale for your views.

Yes, however we also would like to reiterate that energy suppliers would benefit from the coverage checker being able to confirm SM WAN coverage for a 90 day window, rather than 30. This, in particular, would assist smaller suppliers who have no direct access (as they are using an adaptor service) to the SSI and coverage checker database. We understand from DCC that the CSV report that we can extract (via our adaptor service) is not updated as frequently as the coverage checker itself.

In continuation of the response provided for question 1, we feel that a DCC authorised publication explaining what proactive install and leave means in plain English would be beneficial to providing a consistent message to end customers, regardless of the energy supplier performing the installation.

Q4) Do you agree that the proposed legal drafting accurately reflects our policy intention on maintenance and replacement of smart metering systems? Please provide a rationale for your views.

Utilita understands the requirements supporting the maintenance of smart metering systems, and agrees that the legal text supports this requirement.

Q5) Do you agree with the legal drafting of the proposed amendment to the electricity supply licence condition 50 regarding change of suppliers? Please provide a rationale for your views.

Yes.

Q6) Do you agree with the proposal and associated legal drafting to introduce additional requirements to provide for appropriate testing when the Secretary of State proposes to introduce amendments to the SEC? Please provide a rationale for your views.

We are always in favour of the requirement to test when any changes are implemented, and agree that the proposal and associated legal drafting support this requirement. However, we would like to highlight here that testing requirements should be proportionate to the change in question, allowing sufficient time for testing *and* regression testing. These timescales should consider the level of demand on DCC / CSP test labs, ensuring that all suppliers have access to slots to successfully prove the changes.

Q7) Do you agree with the proposal and associated legal drafting (amendments to Section D) to clarify when and how testing requirements should be considered, for SEC Modification proposals? Please provide a rationale for your views.

Yes, however the testing of modifications should not be overly onerous as mentioned previously, only requiring the testing to be performed by impacted parties. Smaller suppliers may have difficulty in resourcing the amount of testing which may potentially be required (given the number of modifications open currently), therefore full testing should only be expected by impacted parties. It is also important that the CSP test labs have the ability to flex resource to meet the demand required when a modification proposal is implemented, and suppliers are required to test the changes.

Q8) Do you agree with the proposal and associated legal drafting to provide enduring RDP Entry Process Tests? Please provide a rationale for your views.

No comment.

Q9) Do you agree that it is appropriate that the new Electricity Distribution Licensee or Gas Transportation Licensee holders, who opt to use the services of an existing RDP (which has already successfully completed RDP Entry Process Tests) be permitted to use this testing service? Please provide a rationale for your views.

No comment.

Q10) Do you agree with the proposal and associated legal drafting to provide DCC with the ability to require a Testing Participant to remove its Devices from a DCC test laboratory, in accordance with the requirements set out in the ETAD? Please provide a rationale for your views.

Yes.

Q11) Do you agree with the proposal and associated legal drafting to clarify the requirements around Test Communications Hubs? Please provide a rationale for your views.

Yes.

Q12) Do you agree with the proposed changes and legal drafting in relation to Section N? Please provide any rationale.

We feel that the intention of the proposed changes and legal drafting look to be acceptable, however we would like BEIS to provide confirmation as to whether the new licence provisions encompass any original requests for information, or whether they apply solely to any newly placed requests for information? This is with respect of the protection afforded to suppliers by the intended drafting whereby suppliers are unable to disclose information due to the constraints of the commercial contracts which are in place.

Q13) Do you agree that the legal drafting implements the changes to Ofgem's Significant Code Review powers contained in its Code Governance Review 3 Final Decision?

No comment.

Q14) Do you have any comments on the proposed changes to Section H and Section I? Please provide a rationale for your views?

No comment.

Q15) Do you agree with the proposals to make certain transitional variations described in Chapter 3.4 enduring? Please provide a rationale for your views.

Yes.

Q16) Do you agree with the proposal to revise the RDP Systems definition and the associated legal drafting? If not, please provide a rationale.

No comment.

Q17) Do you agree with our proposals for how multiple Technical Specifications and GBCS should be managed within the Code and do you have any comments on the proposed changes to supply licence conditions, the DCC licence and the SEC in order to give effect to them?

Yes.

Q18) Do you agree with our proposed approach to facilitating multiple versions of DUIS (and associated versions of the Message Mapping Catalogue and Parse and Correlate software)?

Yes, however it is critical that any matrices relating to this and the interoperability of other technical specifications is updated regularly and maintained by the SEC to assist suppliers and manufacturers.

Q19) Do you agree with the proposals to make the changes set out in the Minor Miscellaneous Changes chapter and do you agree with the associated legal drafting? Please provide a rationale for your view.

With regards to the proposed changes to section H3.27, we do not understand why this section is not going to be activated at DCC live. We maintain that it is critical for the success of the programme and as a network as a whole, that DCC prioritises certain prepayment service requests over other non-critical commands (such as scheduled reads and so forth). Please provide an explanation as to why BEIS no longer deems this necessary.

Should you require any additional information, please do not hesitate to contact me.