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Smart Metering Implementation Programme – Product Delivery Team
Department for Business, Energy and Industrial Strategy
3 Whitehall Place,
London,
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17th October 2016

Dear Sir or Madam,

RE: Consultation on Smart Energy Code and Licence Amendments – September 2016

The SEC Panel welcomes the opportunity to respond to the Department for Business, Energy and Industrial Strategy (BEIS) consultation on Smart Energy Code and Licence Amendments. This response from the SEC Panel is from the perspective of the governance role of the SEC Panel and SEC Sub-Committees and assumes that SEC Parties will provide their own views on the specific requirements set out in the consultation document.

The Panel notes the proposed addition to SEC Section D: 'Modification Process', particularly the clarification that the DCC is to provide "robust testing solutions" as part of the modification process. The Panel Release Management Policy currently covers details around modification implementation testing and the consideration of testing requirements is given as each Modification Proposal progresses through the modification process. It is expected that the testing approach input from the DCC will focus on the DCC system testing. Any required User testing will be driven by the Working Group discussions during the Refinement Process and by the Panel when overseeing the implementation of releases as a whole. The Panel does note that, the specific additions around testing may increase the workload of Working Groups and SECAS, however this is expected to be minimal as it is in line with activities already undertaken.

The Panel also notes the inclusion of a new SEC Section A3: 'Technical Specifications, the GB Companion Specification and the Commercial Product Assurance (CPA) Security Characteristics'. The inclusion of this new section will provide useful clarification to industry on how multiple versions of these technical documents will be maintained.

However, while the examples provided in the consultation are straight forward, it should be noted that as multiple versions of each of the Smart Metering Equipment Technical Specification (SMETS), Communication Hub Technical Specification (CHTS) and Great Britain Companion Specification (GBCS) are introduced, the matrices will become progressively more complex.

The complexity matter equally applies to the proposed revisions to SEC Section F2.11 'Technical Specification Compatibility', in that once there is more than one version of the Technical Specifications and GBCS, the Technical Specification Compatibility matrix will become quite complex due to capturing the relationship between multiple versions.

We note that from an enduring governance perspective, whenever a new version of SMETS or CHTS is introduced, the relevant tables in the proposed new Section A3 will also require amendment. This will need to be considered as part of the Modification Process when any Modification Proposals will



amend the Technical Specifications, and will need to be captured in the Modification Reports associated with the respective modification to the Technical Specifications.