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14 October 2016

**September 2016 Consultation on Smart Energy Code and Licence Amendments**

Dear Sirs

Smart Meter Assets (SMA) is a funder of domestic smart meters in the UK supporting energy suppliers in delivering the smart meter implementation programme which, in turn, will allow the well-documented benefits from smart meter deployment to be realised. We are part of a group of companies which also operates widely in the UK utility sector which provides access to real life experience in interfacing with and delivering the programme.

We have specific interest in Chapters 1 and 3 of the consultation and have formulated our responses loosely around those key areas.

Should you wish to arrange a face to face meeting to discuss the points raised in more detail do not hesitate to let me know and we can convene at your convenience.

## Chapter 1

### *Install and Leave – Q2*

SMA support the efforts to allow “install and leave” as a pragmatic way to maximize ultimate deployment of smart meters to all in the UK. Practically, in the fullness of time, availability of dumb meters will not be guaranteed and, with decreasing volume requirements and the diseconomy of scale of production, the cost difference between dumb and smart meters will erode such that smart meters may as well be installed even if operating in dumb mode.

The point we would make in this area specific to the text being consulted on, which has been recognized by the relevant working group, is that we believe that before changing the code to require a look-up against the DCC WAN connectivity matrix it needs to be checked that the full postcode for New Connections is known as, without a postcode, it would not be possible to meet the criteria to allow install and leave. This part may need to be re-examined.

### *Maintenance of Smart Metering Systems - Q4*

It is essential, to avoid unnecessary diversion of scarce installation resource and waste of functional compliant meters, that the intent described is reflected in code and, as such, we are happy with the amendments subject to appropriate Maintenance Validity Periods being agreed.

### *Simplification of change of supplier information flows*

The specific clarification is intended to remove duplication of information flows which, on the face of it, appears sensible. A MAP is wholly reliant on receiving data from suppliers (or agents on their behalf) to ensure accurate rental invoicing for meters. There are significant issues currently where energy supplier agents (MAM//MOP) are not updating MAPs on change of supplier. We believe this issue (the movement of data associated with change of supplier) should be assessed in its entirety rather than removing one known duplication in isolation as it is important that **all** relevant parties are aware of change of supplier events. Any review should extend to gas data flows as the issue is more prevalent in gas than in electricity.

## Chapter 3

### *Changes to Section N to support SMETS1 Enrolment and Adoption by the DCC – Q12*

We do not believe these changes go nearly far enough.

With an expected 10m SMETS1 meters expected to be installed, SMA believe that clear timescales should be set directing the DCC to enroll and adopt SMETS1 meters rather than simply setting out what *may* be done *if* needed where directed by the Secretary of State.

There is sufficient evidence, which has been provided to Ofgem and can be discussed separately with the Department, of SMETS1 meters being removed as a result of change of supplier and a major contributor to this is lack of interoperability. Enrolment and adoption will resolve this issue and all parties we liaise with (meter manufacturers, energy suppliers, SMSO service providers) are supportive of enrolment and adoption. Despite this broad base of support there appears to be reticence to committing to a plan – the Secretary of State providing direction

now would, we believe, ensure the development of a firm plan to enroll and adopt SMETS1 meters.

**Failure to resolve this issue risks a high volume of poor customer experiences of Smart** whereby they need to have a meter change on change of supply or, at best, lose Smart functionality. With the associated costs of unnecessary meter changes ultimately being picked up by all UK consumers we see the risk associated with poor consumer experience and bad press having a high probability of developing into a major issue for the programme.

*Changes to the SEC to enable it to accommodate multiple versions of Technical Specifications – Q17*

As discussed above, SMA are supportive of this approach subject to MVPs being set at a duration commensurate with expected meter asset life.