



Department
of Energy &
Climate Change

Smart Metering Implementation Programme

Government response to the March 2015
consultation on non-domestic smart metering: the
DCC opt-out

21 April 2016

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General information

Purpose of this document:

This document sets out the Government's response to Part A of the March 2015 consultation on non-domestic smart metering (the DCC opt-out). A further consultation has been published alongside this response: <https://www.gov.uk/government/consultations/further-consultation-on-non-domestic-smart-metering-the-dcc-opt-out>

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Territorial extent:

This consultation applies to the gas and electricity markets in Great Britain. Responsibility for energy markets in Northern Ireland lies with the Northern Ireland Executive's Department of Enterprise, Trade and Investment.

Additional copies:

You may make copies of this document without seeking permission. An electronic version can be found at:

<https://www.gov.uk/government/consultations/consultation-on-non-domestic-smart-metering>.

Other versions of the document in Braille, large print or audio-cassette are available on request. This includes a Welsh version. Please contact us using the details above to request alternative versions.

Quality assurance:

This consultation has been carried out in accordance with the [Government's Consultation Principles](#).

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

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1. Introduction

Non-domestic smart metering

1. The Government is committed to ensuring that every home and small business in the country is offered a smart meter by the end of 2020, delivered as cost effectively as possible. The roll-out of smart meters is an important national modernisation programme that will bring major benefits to businesses and the nation as a whole. Smart meters will give all smaller non-domestic consumers the opportunity to engage with their energy use and make savings on the basis of better information about their consumption. Smart meters will bring an end to estimated billing. Robust interoperability is essential to support government objectives on easier and faster switching, ensuring that a competitive energy supply market can be fostered. Smart metering will underpin the transition towards a smarter energy system, for example by providing the functionality that supports time of use tariffs, and enabling non-domestic consumers to access the benefits this can provide them should they wish to.
2. Energy suppliers are responsible, under their standard licence conditions of electricity and gas supply (the 'Supply Licence Conditions'),¹ for rolling out smart meters. The Government's role is to provide the right framework and milestones against which they can plan.
3. The non-domestic roll-out covers around three million meter sites.² These sites are very varied: they include both private and public sector organisations, and range from small shops to chain stores, from small industrial units to schools. The Programme's economic impact assessment forecasts net benefits in the non-domestic sector of around £1.9 billion.³

Background to the DCC opt-out policy

4. In the late 1990s the Government required that metering should be capable of providing detailed information about energy use for the largest non-domestic sites; a roll-out of advanced metering to medium-sized sites⁴ was mandated between 2009 and 2014; and already many small sites have advanced metering. In recognition of this existing activity, which brings benefits to customers today, the Government has, so far, taken a slightly different approach to rolling out smart meters for the smaller non-domestic sector from that taken for the domestic market.

¹ See: www.ofgem.gov.uk/licences-codes-and-standards/licences/licence-conditions

² Licence conditions require energy suppliers to install smart metering (or in some circumstances, advanced metering) to gas sites where average annual consumption is below 732 MWh per year and all electricity sites in Profile Classes 1-4 (the majority of non-domestic electricity consumers are in profile classes 3 and 4).

³ DECC (2014) *Impact assessment: Smart meter roll-out for the domestic and small and medium non-domestic sectors (GB)*, available at: www.gov.uk/government/uploads/system/uploads/attachment_data/file/276656/smart_meter_roll_out_for_the_domestic_and_small_and_medium_and_non_domestic_sectors.pdf. Appraisal period 2013-2030.

⁴ Defined as gas non-domestic premises with an annual consumption of greater than 732 MWh and electricity non-domestic premises where the metering point falls within profile class 5 to 8.

5. One difference in approach has been to allow energy suppliers to use communications services other than those provided by the Data and Communications Company (DCC)⁵ for any SMETS2⁶ meters they install at non-domestic premises. This policy has generally been referred to as the “DCC opt-out”.
6. The DCC brings various benefits, in particular an interoperable solution which ensures that customers with smart meters can switch supplier easily without losing their smart metering services or requiring meter replacement; the ability for smart metering data to be shared with network companies, facilitating more efficient network management; and the ability for customers to give third parties access to their data, for example as part of an energy management or advice service, or to allow tariff comparisons.
7. In 2010 the Government proposed the DCC opt-out in its Smart Metering Prospectus Consultation⁷ and subsequently confirmed it as policy in its consultation response in 2011⁸. This decision was taken on the basis that a competitive market was already established for communications services in the non-domestic advanced metering market. However, the Government Response noted that the policy would be “kept under review and action may be taken if, for example, evidence emerges of serious interoperability issues or if the development of smart grids is being hampered”.
8. At the time the policy was established, it was envisaged that an energy supplier would be able to make a choice between operating a smart meter using the DCC’s services and using equivalent services from another provider (such as communications providers operating in the existing advanced metering market), and that meters would be interoperable between such providers. However, we have always envisaged that the majority of non-domestic suppliers would in any case choose to use the DCC communications services.

Subsequent developments

9. As key aspects of the smart metering system design were finalised, Government engaged with industry to establish how SMETS2 meters could be operated for non-domestic consumers outside of the DCC in smart mode. For this to work, an equivalent of the DCC’s communications hub would be needed to enable communications with the meter, and much of the DCC’s infrastructure would need to be replicated. For example, to ensure messages are protected in the way that is outlined in the Great Britain Companion Specification⁹, an alternative communications provider would need to have the technical capability to create messages in the GBCS format so that they can be read by a SMETS2 meter. The capability to support public key cryptography would also be

⁵ DECC granted Smart DCC Ltd a licence in September 2013 to establish and manage the data and communications network to connect smart meters to the business systems of energy suppliers, network operators and other authorised service users of the network.

⁶ Smart Metering Equipment Technical Specifications (SMETS) : the document brought into force by the Secretary of State to describe the minimum capabilities of equipment installed to satisfy the roll-out licence conditions. See:

<https://www.gov.uk/government/consultations/smart-metering-equipment-technical-specifications-second-version>

⁷ Smart Metering implementation Programme – Prospectus, DECC/Ofgem (July 2010): <https://www.ofgem.gov.uk/ofgem-publications/63541/smart-metering-prospectus.pdf>

⁸ Smart Metering implementation Programme – Response to Prospectus Consultation, DECC/Ofgem (March 2011): https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/42734/1475-smart-metering-imp-response-overview.pdf

⁹ See:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/367334/smip_finalising_the_gbcs_consultation.pdf

needed. DECC is not aware of any alternative provider that is already able, or is planning, to offer such services.

10. In light of these system developments and through consultation and engagement we understood that some stakeholders were concerned that the opt-out policy was no longer appropriate, whilst others called for further clarity on the policy position. Given these views and the original commitment to review the policy should issues emerge, the then Government made the decision to consult, seeking updated stakeholder views and evidence on the appropriateness of the opt-out policy position.

March 2015 consultation on non-domestic smart metering

11. The consultation, published in March 2015, was made up of two parts. Part B of the consultation related to the advanced metering exception, which the Government responded to on 17 December 2015. In the response we confirmed that the period in which advanced metering may be installed would be extended from 6 April 2016 to 28 April 2017 for large suppliers and 17 August 2017 for small suppliers. It was also confirmed that suppliers may continue to install advanced meters after the end-dates noted above, but only if a contractual agreement is in place prior to 6 April 2016.¹⁰ The regulatory amendments to give effect to these changes came into force in March 2016.
12. Part A of the consultation concerned the DCC opt-out. It noted that the Government was not aware of any alternative provider for the non-domestic sector planning to come forward to provide equivalent DCC services that enabled the satisfactory operation of SMETS2 meters if opted-out of the DCC. It also highlighted the Government's view, supported by some stakeholders, that the DCC opt-out would impact the ability to establish a fully interoperable solution when transferring meters between opted-in and opted-out suppliers.
13. This document sets out the Government's preliminary response to Part A of the consultation. The consultation responses received have lead us to a preliminary conclusion that the DCC opt-out policy is no longer appropriate, particularly as it appears opted-out meters cannot deliver the policy aims of interoperability and easier switching. Further, there was no firm evidence received of an alternative provider coming forward to deliver an equivalent service to the DCC. The Government's minded-to position is therefore to remove the opt-out subject to the results of a further consultation to test this provisional conclusion and to seek additional evidence. The further consultation is being published alongside this document¹¹ and is seeking evidence and views by 27th May 2016.

¹⁰ See:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/486136/AME_consultation_response_FIN_AL.pdf

¹¹ See: www.gov.uk/government/consultations/further-consultation-on-non-domestic-smart-metering-the-dcc-opt-out

2. Government response on removal of the DCC opt-out

Alternative Smart Metering Communication Services

Consultation Question	19 responses
1.	Do you envisage that smart metering communication services will be or are likely to become available from alternative providers to enable the satisfactory operation of SMETS2 meters if opted-out of the DCC?

Summary of issue under consideration

Following work undertaken to complete the end-to-end smart metering system design, we considered that it may be difficult to operate SMETS2 meters outside of the DCC in smart mode. For this to work, an equivalent of the DCC's communications hub would be needed to enable communications with the meter, and much of the DCC's infrastructure would need to be replicated. For example, to ensure messages are protected in the way that is outlined in the Great Britain Companion Specification (GBCS)¹² it is likely that functionality to enable message transformation and capability to support public key cryptography would be needed. DECC was not aware of any alternative provider planning to offer such services.

Summary of responses

14. Nineteen responses to Question 1 were received from a range of stakeholders including large and small suppliers, network operators, trade associations, data service providers, a consumer group, Ofgem and the DCC.¹³
15. Thirteen respondents, including large and small suppliers, said that they did not envisage smart metering communication services from alternative providers becoming available. Most of these respondents thought that providing such services would not be commercially viable and a number pointed out that any alternative provider must replicate DCC functionality and adhere to the required security credentials on opted-out meters. It was considered that this would introduce significant development cost and any alternative provider would not be able to achieve the same economies of scale as the DCC, given that it would have a smaller customer base.
16. Five respondents - including a small energy supplier, two energy services companies and a trade association - said that they did envisage an alternative communications service emerging, with some citing the role of consumer demand in encouraging the

¹² Government response to a consultation on the Great Britain Companion Specification, DECC, November 2014: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380429/SMIP_GBCS_consultation_response.pdf

¹³ See Annex A.

development of this market. One respondent was of the view that because advanced metering devices are not currently supported by the DCC there is a gap in the market for a non-DCC service provider to develop a solution which can serve both advanced and SMETS2 meters. Another respondent pointed to the success of the advanced meter market which now includes multiple service providers. Two respondents thought there would be significant competitive pressure which would lead to the development of alternatives. One energy services company thought that the DCC opt-out presented an opportunity for companies who provide meter reading software and services.

Government response

17. Whilst the views put forward by some respondents set out an expectation that an alternative communications service could emerge, the Government did not receive convincing evidence that communication services will be, or are likely to become available from alternative providers to enable the satisfactory operation of SMETS2 meters if opted-out of the DCC. No specific examples of initiatives to develop alternative communication services were identified, and no evidence was presented that would support the hypothesis that competitive pressures would lead to the development of such services. The responses to this question have been a key consideration for the Government in reaching its minded-to position on removing the DCC opt-out.

Interoperability of opted-out SMETS2 meters

Consultation Question		23 responses
2.	<p>a) We would welcome views on what challenges are likely to be faced on the transfer of meters between opted-in and opted-out suppliers.</p> <p>b) We also invite comments on what you consider to be the likely impacts on the interoperability of SMETS2 meters if some SMETS2 meters are opted-out.</p>	
Consultation Question		19 responses
3.	<p>Are the actions that the Programme would need to take (in conjunction with stakeholders) to facilitate an opt-out proportionate, given the possible numbers of meters that might be subject to an opt-out? In answering, please take into account your response to Question 2.</p>	

Summary of Issue under Consideration

The consultation explained that we anticipated that facilitating an effective opt-out would entail significant complexities for the DCC and other service providers. For example, it would be necessary for the Programme, working with the DCC and stakeholders, to specify detailed arrangements for meters on transfer between opted-out and opted-in suppliers. Key among these would be arrangements for maintaining security credentials on opted-out meters, so that opted-in suppliers could trust meters that transfer to them upon change of supplier. This could require a fundamental review of the arrangements already in place, including detailed review by stakeholders. There would be additional cost and complexity for the DCC to develop and manage systems for handling the churn of meters across opted-in

and opted-out suppliers.

We also anticipated impacts on the interoperability of opted-out SMETS2 meters. Site visits to change devices may be necessary under several scenarios involving customer switching between opted-out and opted-in suppliers.

Since the consultation concluded, we have further considered what changes to the regulatory framework and current requirements would be needed if an opt-out were to be facilitated and whether these are proportionate, given the possible numbers of meters that might be subject to the opt-out. Our current view of these issues is set out in paragraph 27 below.

Summary of responses

Transfer of meters between opted-in and opted-out suppliers and interoperability (question 2)

18. Twenty-one of the Twenty-three responses to Question 2 identified a wide range of challenges that are likely to be faced on the transfer of meters between opted-in and opted-out suppliers. These include:
 - difficulties for suppliers gaining new customers in identifying whether a meter is opted-out, which would be particularly complicated for meters operating in prepayment mode;
 - difficulties in maintaining security credentials on the meter and concerns about the ongoing security of the end to end system;
 - the supplier costs of site visits that respondents expected would be needed to change metering equipment, primarily because of security issues;
 - erroneous information on an In-Home Display (IHD) where provided, if the information related to a previous (opted-in) supplier;
 - the need for more complex industry systems and processes to achieve switching;
 - the potential need for dual fuel customers to have two communications hubs;
 - disconnection of downstream devices if a communications hub that is part of a mesh or “buddy mode” connection needs to be replaced; and
 - the safe and timely transfer of meter communication details and history from opted-in to opted-out meters.
19. One respondent noted that if the meter was able to interact with and be operated by both the DCC and the alternative communications service provider then site visits could potentially be avoided, but currently no such devices exist. It was noted that if such a device was to be developed this would be likely to affect the design, build and implementation of opted-in suppliers’ systems and processes.

20. Several respondents also noted that opted-out meters may not deliver the network operator benefits identified in the Impact Assessment.¹⁴
21. One respondent expressed the view that there are already effective solutions to manage change of supplier for advanced meters and that these processes avoid the need to exchange meters. It was suggested that this could be replicated to manage change of supplier between opted-in and opted-out suppliers. Other respondents thought that the Non Gateway Interface (NGI), which was expected to be used for domestic SMETS meters which churn from a DCC User supplier to a non-DCC User supplier, and had not yet completed accession testing, could be extended to serve the non-domestic sector.
22. A couple of respondents did not support the removal of the opt-out on the grounds that it would reduce competitiveness in the market. They were of the view that the advanced meter market demonstrates that a solution could be delivered and that the NGI may offer an economically viable solution. However, most respondents thought that to support the opt-out would disproportionately increase costs to the DCC and that the cost of retaining the NGI on an enduring basis may be significant.

Facilitating Opt-Out (question 3)

23. Of the nineteen responses received to Question 3, fourteen said that they did not think that the actions that the Programme would need to take to facilitate an opt-out would be proportionate. It was thought that since the majority of non-domestic premises are supplied by suppliers who also have domestic customers in their portfolios, and because it is mandatory to utilise the services of the DCC for domestic consumers, these suppliers would also use the DCC to serve their non-domestic customers. The numbers of SMETS2 meters being operated outside the DCC would therefore be so small that opt-out services would not be commercially viable. One respondent thought that opted-out suppliers would be likely to be small with limited resources and therefore the Programme would have to provide considerable support to this group. It was also noted that opt-out would mean complex developments for DCC and supplier systems and processes, as well as regulatory change to enable it.
24. Four respondents thought that the actions the Programme would need to take to facilitate opt-out would be proportionate. One thought such action would be proportionate in relation to the risk of not enabling a competitive market. One respondent pointed to the NGI as potentially offering a low cost solution.

Government response

25. The consultation responses provide further evidence to support the Government's view that the challenges faced on transfer of meters between opted-in and opted-out suppliers would be significant and that interoperability between opted-out and opted-in SMETS2 meters would be severely limited without substantial additional investment. However, we recognise that business-only suppliers could benefit from having the same provider to service both SMETS2 meters and advanced meters and which, under current plans, cannot be delivered by the DCC. We also note that some respondents were confident that alternative providers would emerge. We are therefore inviting further and specific evidence that smart metering communication services will be available from alternative

¹⁴ See:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/276656/smart_meter_roll_out_for_the_domestic_and_small_and_medium_and_non_domestic_sectors.pdf

providers to enable the satisfactory operation of SMETS2 meters outside the DCC. This question is set out in the further consultation document.¹⁵

26. Since the opt-out consultation was published in March 2015, DECC has decided, following consultation, not to require DCC to build an NGI. This is because it has become clear that, as a result of regulatory and operational changes, the interface would no longer represent value for money. Instead, in the event of a consumer moving from a supplier using the DCC (a User) to one not using it (a non-User), the outgoing User Supplier's Smart Metering Key Infrastructure (SMKI) credentials will remain on the SMETS2 Metering System until the new non-User Supplier has become a User. This decision is set out in the December 2015 Government response to Smart Energy Code consultations.¹⁶
27. We have also given further consideration to what action would be needed to facilitate the opt-out in light of the consultation responses received. This has confirmed the Government's view set out in the consultation document that facilitating an effective opt-out would entail significant complexities for the DCC and other service providers. We consider that the most significant and extensive changes required would be those needed to address security issues, particularly those associated with exchange of security certificates on meters. Even with substantial investment we do not consider that full interoperability between opted-in and opted-out meters (or opted-out and opted-out meters where there is more than one Smart Meter System Operator (SMSO)) would be achievable. This is because if an alternative SMSO were to operate SMETS2 meters outside the DCC, at the very least the DCC communications hub would need to be replaced on churn by the SMSO's communications hub as the former can only be operated by the DCC. Similarly a third party SMSO's equivalent communications hub may need to be replaced with a DCC communications hub on churn from an opted-out to an opted-in supplier. Furthermore, we consider that in order to obviate the need for replacement of meters on churn, it would be necessary for opting out suppliers (and/or their SMSOs) to participate in DCC's security key infrastructure.

Reviewing the opt-out policy

Consultation Question	25 responses
4.	Do you consider that the opt-out policy position remains appropriate or should it be removed? In particular, please include views on any specific issues you think the Government would need to consider if it were to remove the opt-out and require the enrolment in DCC of SMETS2 meters installed at non-domestic premises.

¹⁵ See: www.gov.uk/government/consultations/further-consultation-on-non-domestic-smart-metering-the-dcc-opt-out

¹⁶ See: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/484710/15_11_26_December_2015_SEC_Government_Response_final.pdf

Summary of issue under consideration

A significant majority of Programme benefits will be enabled through the installation, enrolment in DCC and operation of SMETS2 meters. Where meters are operated using the DCC's services, customers will be able to switch between suppliers easily without losing their smart meter services.

In light of the likely difficulties in operating SMETS2 meters satisfactorily outside the DCC, the March 2015 consultation was intended to gather evidence to inform a Government decision as to whether the non-domestic opt-out remains appropriate.

Summary of responses

28. Of the twenty-five responses to this question, eighteen supported removal of the opt-out policy. Reasons commonly cited included that it would ensure interoperability and easier switching, and that removal of the opt-out would also increase the number of meter end-points served by the DCC and therefore would maximise efficiencies. Removing the opt-out would ensure that smart meter benefits would be retained for customers as it would remove the risk that they would lose services when changing to an opted-out supplier. It would also ensure that network operator benefits are retained, and it would reduce costs including by maximising economies of scale for the DCC. It was also noted that removal of the policy would permit uniform charging arrangements for meter points under the DCC, which would be simpler. One respondent suggested that the removal of the opt-out policy would not impact the operation of advanced meters and therefore it would not affect the competitiveness of the market in this sector.
29. Seven respondents, including two energy services providers, two small suppliers, and three trade associations, thought that the opt-out policy position remained appropriate. Arguments for this position included that competition is fundamental to development of this sector and that, in the view of one respondent, the benefits are only achievable if consumer choice remains. Other views included that the opt-out should be retained since the DCC would be too expensive for energy service companies to access so the removal of the opt-out would distort the market for energy management services. Another concern raised was that suppliers with large advanced meter portfolios should be able to use a single communications supplier for advanced meters and SMETS2 meters so that they could benefit from similar economies of scale as DCC users. One respondent pointed to the importance for small suppliers of being able to differentiate services from those of larger suppliers, providing a competitive opportunity for customers.

Government response

30. No firm evidence was provided in response to the consultation to support the view that it was likely that alternative communications services capable of the satisfactory operation of SMETS2 meters outside the DCC would emerge. We consider that removing the opt-out would therefore substantially increase delivery of smart metering benefits to a wide range of non-domestic consumers, especially through ensuring interoperability and helping to put conditions in place for faster switching and a more competitive market among energy suppliers.

31. Government is therefore minded, subject to further evidence gathering and assessment, to remove the DCC opt-out for non-domestic premises. However, we are publishing a further consultation document¹⁷ alongside this response that invites further and specific evidence on whether services that would deliver interoperability between opted-in and opted-out SMETS2 meters are being developed.

Summary of further consultation.

32. We have considered concerns about the impact on competition in the communications services market in light of evidence presented in the Competition and Markets Authority's (CMA) provisional decision on remedies from their energy market investigation.¹⁸ The provisional decisions conclude that low levels of consumer engagement (especially among microbusinesses) acts as a barrier to driving effective energy supply competition. We considered this evidence in reaching the preliminary Government view that some restriction in competition in the smart metering communication services market may be needed to address the wider problems that contribute to a lack of effective competition in the energy supply market. The Government's vision (set out at paragraph 1 above) for the role of smart metering for smaller non-domestic consumers is that it should support our objectives on faster and easier switching. We believe this could play an important part in removing the barriers to microbusiness engagement in the non-domestic energy market.
33. Therefore, another area where we are seeking further evidence is on the issues that consumers with SMETS2 meters are likely to face when switching between opted-out and opted-in suppliers, how this would affect their willingness to switch suppliers, how this would affect their ability to realise smart meter benefits and the impact on the non-domestic market.
34. With regard to concerns about the costs for energy service companies to access DCC services, these will include costs associated with becoming a DCC 'Other User' and establishing and maintaining the communications link with the DCC¹⁹. Other Users will also need to ensure that their IT systems are capable of interfacing with the DCC and must meet specified security and privacy requirements, which will be subject to audit and the associated costs.
35. While the Government is minded-to remove the opt-out, we will reconsider this position if the further consultation finds either firm evidence that services equivalent to those provided by the DCC – including allowing full interoperability between opted-in and opted-out SMETS2 meters – will be forthcoming; or evidence that lack of interoperability would not reduce businesses' willingness to engage with the market and switch supplier, in comparison with a situation where there was full interoperability.
36. To implement the Government's minded-to position to remove the opt-out, the existing regulatory framework would need to be amended to ensure that it is consistent with the requirement for all SMETS2 meters to be enrolled in the DCC. We have undertaken a review of the framework to identify the modifications that would be needed to implement such a decision and to provide reassurance that there is sufficient protection against the DCC abusing its monopoly position should the opt-out be removed. The further

¹⁷ See: <https://www.gov.uk/government/consultations/further-consultation-on-non-domestic-smart-metering-the-dcc-opt-out>

¹⁸ See: https://assets.digital.cabinet-office.gov.uk/media/56efe79040f0b60385000016/EMI_provisional_decision_on_remedies.pdf

¹⁹ See <http://www.smartdcc.co.uk/dcc-users/> for further information on the costs of becoming a DCC user.

consultation identifies the main amendments that would be needed and invites views on DECC's approach.

Annex A: Responses Received

British Gas	IMServ
Citizens Advice	Institute of Directors
Corona Energy	Npower
DCC	Ofgem
Dong Energy	Opus Energy
EDF Energy	Pilot Systems
Electricity North West	Scottish Power
E.On	Siemens
ESTA	SSE
Good Energy	Wales & West Utilities
Haven Power	One confidential response
ICoSS	

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