



## **DECC Consultation – DCC Procurement Strategy and Statement of Service Exemptions**

**Response from E.ON**

### **DCC Procurement Strategy Document**

***Do you have any comments on the DCC's Procurement Strategy for Relevant Service Capability?***

The procurement strategy set out in the proposal from the DCC seems to conform to industry best practice and is appropriate for the activities undertaken.

As such we have no concerns with the proposals from the DCC regarding their Procurement Strategy document.

### **DCC Statement of Service Exemptions Document**

***Do you have any comments on the DCC's Statement of Service Exemptions?***

The document seems to lack the detail we would have expected to be seen in this document and as such we do not believe that it meets the requirements set out in the Licence.

In particular the document seems to lack detail as to why specific properties will not be able to receive smart metering wide area network (SMWAN) communications. It sets out only at very high general conditions as to why radio communication may not function.

As the DCC is expected to publish post code level information regarding the property areas where SMWAN will not be available we would expect this document to accompany that information.

We would expect to see a full explanation as to what areas of the country would not be expected to receive a SMWAN and why. From the information provided a reader could speculate as to the logic as to why the northern CSP area coverage increases. Probably as a result of new base station deployment, but this is not made clear in the document nor is supporting information provided.

Information regarding the central and southern CSP regions is even less clear for a reader to understand. No mention is made of the different types of technology deployed by the CSP in these regions and the affects that this may have on SMWAN coverage.



The table of coverage development is difficult to understand as it would appear SMWAN coverage remains static at 80% until November/December 2016. At this point the remaining 20% of the SMWAN coverage can suddenly be expected to materialise. No explanation for this is found in the Statement.

Descriptions of potential Category 2 properties are equally as vague. General issues that may affect radio signals reaching a meter are described but there is little evidence as to what modelling of actual properties has taken place by the DCC and the various CSP.

The level of detail in the Statement of Service Exemptions compared to the other documents recently prepared by the DCC is also notable. Whilst in general these have been thorough, comprehensive and useful documents this one is significantly lacking in sufficient detail and as such we would recommend that DECC does not approve it in its current form.

We also note that the DCC believes that this document will improve 'in time' as energy suppliers provide it with more information about the effectiveness of the SMWAN. This seems to miss the point that underlying value in this document is for energy Suppliers and consumers. To provide them with information about the service that is being provided for them and to help them with the deployment of the smart meters. In its current form it fails to deliver this.