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Smart Metering Implementation Programme -
Regulation
Department of Energy & Climate Change
Orchard 3
Lower Ground Floor
1 Victoria Street
London
SW1H 0ET

Our Ref:CJA

Your Ref: January 2015 SEC Consultation

19 February 2015

Dear Sirs

Consultation on Smart Energy Code Content

Northern Powergrid is the electricity distribution (DNO) business for the Northeast, Yorkshire and parts of northern Lincolnshire, operating through its two licensed subsidiaries, Northern Powergrid (Northeast) Ltd and Northern Powergrid (Yorkshire) plc.

We are grateful to the Department of Energy & Climate Change (DECC) for the opportunity to comment on its consultation on Smart Energy Code (SEC) Content and the accompanying proposed legal text.

Whilst we have no comments to make on the issues raised in the consultation document we would like to take the opportunity to raise an issue that we have been discussing with DECC for several months relating to access by DNOs to information about the smart meter Auxiliary Load Control Switches (ALCS).

Smart meters have the facility to switch significant load in customer's premises in accordance with tariffs agreed between the supplier and the customer; with the time bands for those tariffs being based on historic agreement between suppliers and DNOs. Traditionally such load switching has related to space and water heating but, as part of the move towards a low carbon economy, other loads e.g. electric vehicle charging, could also be switched by the ALCS.

In order to better understand the power flowing in DNOs' low voltage networks, DNOs need to know on an enduring basis what load is being switched by the ALCS and when that load is being switched. To access this information DNOs need to be able to read the ALCS description and the ALCS switching calendar. It is important to note that suppliers will set the description and the switching times (to replicate existing tariff switching times or switching times for newly agreed tariffs); DNOs only need to be able to read the description and switching times. The Energy Networks Association (ENA) has requested read access to these items in previous responses to Great Britain Companion Specification (GBCS) consultations, and DECC had

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indicated in its consultation responses that such access would be granted; however in the current version of the GBCS, DNOs do not have the access rights to read these data items.

We have discussed this issue with DECC and believe that the DNO requirement is understood and recognised. We have been advised that the provision of these access rights to DNOs would not have a material impact on the technical solution nor delivery timescales, and that there is simply a need to revise SEC Appendix E: Data Communication Company (DCC) User Gateway Service Schedule Item 7.7 'Read Auxiliary Load Control Switch Configuration' to include Electricity Distributors. Such a change would permit a change to GBCS to allow DNOs to access GBCS Use Case ESC61a and hence be able to read the ALCS description and switching schedule.

The purpose of this letter is to formally request a change to SEC Appendix E: DCC User Gateway Service Schedule item 7.7 'Read Auxiliary Load Control Switch Configuration', to add Electricity Distributors to the list of Eligible Users.

Whilst this letter is from Northern Powergrid, this issue has been widely discussed at the ENA Smart Metering Steering Group and in effect this request is made on behalf of all DNOs.

Please contact .. if you require any further information.

Yours faithfully