

Smart Metering Implementation Programme

Consultation on New Smart Energy Code Content

DCC response
23rd February 2015

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1 Executive Summary

1.1 Introduction and background

Smart DCC Ltd (DCC) was granted the Smart Meter Communication Licence and acceded to the Smart Energy Code (SEC) on 23rd September 2013.

DCC provides the shared communications infrastructure allowing energy suppliers, network operators and other authorised users to operate Smart Meters. The Smart Meter communication service will enable consumers to manage their energy usage with near to real-time information of their energy consumption. Consumers will benefit from energy savings and reduced emissions as a result of more accurate information, bringing an end to estimated billing.

1.2 DCC's response

This document sets out DCC's response to the consultation on proposed new SEC Content¹ that arises as result of previous SEC consultations (SEC4 and SEC4A) and DCC's consultation on its plan under Condition 13 of the Licence².

The consultation sought views on the following areas:

- Notifying new commencement dates for SEC testing phases
- Informal Testing
- DCC Key Infrastructure Policy Management Authority (DCC KI PMA)
- Changes to when Communications Hubs can be ordered
- Minor consequential changes to the gas and electricity supply licence conditions.

DCC welcomes the opportunity to respond to these proposals. We broadly agree with the proposals set out in the consultation, subject to specific areas for further consideration which we set out in the main body of this response.

DCC looks forward to continuing to work with DECC and stakeholders to build a fit for purpose regulatory framework within which the benefits of Smart Metering can be realised.

If you have any questions regarding any part of this response please address them to
publish this response on its website. DCC plans to

¹ <https://www.gov.uk/government/consultations/new-smart-energy-code-content-january-2015>

² http://www.smartdcc.co.uk/media/14108/141117_dcc_plan_and_im_consultation.pdf

2 Notifying new commencement dates of SEC testing phases

Notifying new commencement dates of SEC testing phases

Q1 Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing? Please provide a rationale for your response.

A1 DCC agrees with the proposal and legal drafting of the provisions for the Secretary of State to direct DCC to revise new dates for the commencement of System Integration Testing (SIT), Interface Testing (IT), End-to-End Testing (E2E) and SMKI Repository Testing (SRT).

3 Informal Testing

Informal Testing

Q2 Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views.

- a) Whether you agree with the strength of the obligation on DCC to offer the service
- b) Whether you agree that DCC can determine the detailed rules to apply to use of the service

A2 DCC broadly agrees with the strength of the obligation on DCC to offer an informal testing service as stated in Annex C 4(a). The applicable obligations ensure any informal testing services provided under H14.31 (a) and H14.31(b) will be conducted in accordance with good industry practice this agreement is subject to following observations:

- a) The requirement within Annex C 4(d) should be altered to reference the Guide for Testing Participants rather than the Enduring Testing Approach Document. DCC has been working with the industry to define the Pre-User Integration Testing (Pre-UIT) solution requirements and to set out the contents of the Guide for Testing Participants for Pre-UIT, including supplemental obligations. We have also discussed this approach with DECC and are proceeding on this basis for the following main reasons:
 - i. The requirements for informal testing are likely to differ from those applicable for formal testing and are likely to be transitional rather than enduring;
 - ii. The requirements to consult upon, and the approval process for, the Enduring Testing Approach Document are likely to delay the final publication of this document, such that it will only be available to Testing Participants shortly before we plan to make available the informal testing services. As such the value of the document would be reduced and the availability and / or usage of the informal testing services could be compromised; and
 - iii. Including the requirements within the Guide for Testing Participants provides a more agile approach to developing the documentation and related service. We believe this provides the necessary rigour and regulatory safeguards to ensure that the integrity and security of testing activities, DCC test systems and Testing Participants are protected.

- b) The requirement within H14.31(b) to test the interoperability of User Systems via the Self-Service Interface should not apply to the informal testing activities this is because the Self-Service Interface will not be available at the point at which Pre-UIT commences, the Self Service Interface cannot be delivered economically without any time and cost implications for the purpose of Pre-UIT.
- c) DCC agrees with the approach for DCC to determine the detailed rules to apply to the use of services stated in H14.31(a) and H14.31(b) as set out in Annex C 4(a), 4(b) and 4(c) of the consultation draft. Providing DCC with the flexibility to determine the detailed requirements for informal testing will ensure that any issues or risks that may arise as a result of informal testing are captured through additional or amended requirements for a more robust and secure informal testing process. For the avoidance of doubt DCC considers the provisions of informal testing to be a value added service therefore Test Participants would need to meet their own obligations aside from the provisions provided during informal testing.

Q3 Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction?

Please provide a rationale for your views

A3 DCC agrees with the proposed SEC amendments for informal testing as set out in Annex C 4(a) of the letter of direction stating that "DCC is obliged to take reasonable steps" to provide services as stated in H14.31(a) - testing the interoperability of User Systems to align with GFI and H14.31(b) - testing the interoperability of User Systems to align with Pre-UIT testing. The explicit obligation outlines the testing activities to provide confidence and reduce any uncertainties Testing Participants may have otherwise had prior to the commencement of informal testing. Although DCC aim to provide an informal testing service such provisions should not compromise the delivery of other critical testing activities such as SIT, IT and E2E to avoid further impact to timescales, resources and costs of the Smart Metering Implementation programme.

4 DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

Q4	<p>Do you agree with our proposals and legal text in relation to the DCCKI PMA Function?</p> <p>Please provide a rationale for your response.</p>
A4	<p>DCC broadly agrees with the proposals and legal drafting in relation to the DCCKI PMA functions subject to the following observation.</p> <p>L13.56 refers to the DCCKI PMA function to notify and provide any recommendations or any modification to the DCC in regards to the DCCKI Document Set. However the DCCKI Document Set includes the DCCKI Certification Practice Statement (DCCKI CPS document) the DCCKI CPS document is not a SEC Subsidiary document and should therefore not be subject to modifications by the Secretary of State as stated in L13.56. DCC suggest that any recommendations or modifications provided to the DCC in regards to the DCCKI CPS document is subject to the approval of the DCCKI PMA. The legal drafting should therefore be amended to reflect this.</p>
Q5	<p>Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State?</p> <p>Please provide a rationale for your response.</p>
A5	<p>DCC broadly agrees with the proposal and legal drafting for modifications of the SEC proposed by DCC in the interest of continuing to comply with the SEC Objectives and our obligations under Section G (Security) to be directed to the Secretary of State subject to the following observation.</p> <p><u>DCCKI CPS Document</u></p> <p>Section L13.56 proposes where an individual carrying out DCCKI PMA function notifies DCC of any recommendation for the modifications of the DCCKI Document Set, DCC may submit a Modification Proposals. However, the DCCKI Document set includes the DCCKI CPS document which is not a SEC Subsidiary document and should therefore not be subject to modification by the Secretary of State. DCC therefore suggest that reference to the DCCKI Document Set in L13.56 is amended to reflect only the DCCKI SEC Documents and recommendation for modifications to the DCCKI CPS document is modified by the DCC should this be required. In addition, sections X3.5 (b) which currently proposes the DCC to notify the Secretary of State of Modification Proposals under L13.56, should be amended to reflect the DCCKI SEC Documents which excludes the DCCKI CPS document.</p>

5 Changes to when Communication Hubs can be ordered

Changes to when Communication Hubs can be ordered

Q6 Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?

A6

DCC agrees that the initial forecast for submitting Communication Hub Orders by SEC Parties should be submitted by the 5th working day before the end of the month ending 10 months in advance of the relevant delivery month. This aligns with the terms of the CSP contract which require the CSP to fulfil Communications Hub Orders that were forecast 9 months in advance of the initial delivery month, allowing DCC 5 working days to process and consolidate forecasts.

Communications Hub Fault Diagnosis

Currently the CSP contracts allow for thirty (30) days after DCC receive the Fault Analysis Report from the CSP to notify the CSP whether DCC accepts the opinion of the CSP regarding the cause of the Fault.

However, F9.13 states that "Unless a Party notifies the DCC of the Party's objection of the DCC analysis within thirty five (35) days after receipt of a report in accordance with Section F9.11 the analysis set out in the report shall be deemed to be correct". This currently does not align with the CSP contract nor does it provide DCC with sufficient time to provide a report from the CSP to a Party and to collate a report to the CSP to inform the CSP as to whether the DCC accepts the opinions regarding the cause of the Fault. Therefore DCC suggest the legal draft is amended to read "Unless the Party notifies the DCC of the Party's objection to the DCC's analysis within 20 days after receipt of a report in accordance with Section F9.11, the analysis set out in the report shall be deemed to be correct". This would ensure that DCC has a sufficient lead time of 5 days to provide a Fault Analysis Report from the CSP to a Party and where a Party objects to the Fault Analysis Report within 20 days, DCC has an additional lead time of 5 days to report back to the CSP to accept or reject the Fault Analysis Report within the 30 days after receipt of a Fault Analysis Report as stated in the CSP contract.

6 Minor consequential change to electricity and gas supply licences

Minor consequential change to electricity and gas supply licences

Q7 Do you agree with the consequential changes we are proposing to electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation?

A7 DCC has no comment on this question.