



Smart Metering Implementation Programme
Regulation Team
Department of Energy and Climate Change
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Dear SMIP team

23rd February 2015

Smart Energy Code Stage 4 Consultation

Thanks for the opportunity to respond.

Informal testing – it would be most helpful if the detailed rules that apply to this service have appropriate interim and enduring testing approach documents fit for purpose for all market participants. The Test Design and Execution Group (TDEG) fora can help in this regard.

Consultation – we suggest that all impacted industry participants remain involved at all levels of Programme development. Any further movements in DCC test dates will impact suppliers' activities and would increase costs, that would ultimately flow to consumers. It seems fair and sensible that those who are having to fund the work should have a voice and participation in decision-making. We support the view that the SMDG should become the Programme Board moving forward with decision-making responsibility.

Timescales – as the programme settles and the roles of participants stabilises there should be greater capability to take a holistic view taken where timescales move and milestones slip. Then consequential impacts for other reliant industry parties can be most fully assessed and the situation and appropriate solutions developed.

This response is not confidential

Yours sincerely

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Notifying new commencement dates for 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?

Partially - We support the inclusion of the mechanism into the SEC, but believe that it should only be invoked after formal, industry consultation.

We agree that a mechanism should be introduced into the SEC for the Secretary of State to request from DCC a new commencement date for SIT, IT, E2E or SRT Testing. However, we believe that this mechanism should only be invoked and any date changes made after formal consultation with the Industry.

We understand that the dates for the above mentioned testing phases will need to be amended following the outcome of the Consultation on Changes to the DCC plan and Implementation Milestones, which the DCC issued during November 2014. However, these dates should be on the Joint Industry Plan (JIP) and therefore subject to IMF change management and governance processes. Any intervention by the Minister of State should be subject to normal governance. That noted, once this alignment has been completed and the testing dates communicated, we believe that any further date changes to these testing phases should only be done through a similar consultation process due to the impact on the whole industry rather than just the DCC.

Furthermore, we believe that the change in dates of the above mentioned test phases will also impact the readiness and execution dates for the SEC party involved activities, i.e. SREPT and UEPT. We recommend that this is clarified in the consultation/ legal text.

Informal Testing

Q2 Do you agree with the proposed provisions for informal testing in the SEC?

- 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**

Partially

We support provision in regard to the proposal that the DCC is obliged to take 'reasonable steps' to provide informal testing services. However, in terms of determining the detailed rules that apply to the service, we recommend that this is discussed and agreed via the TDEG forums and documented in the 'Informal testing guide'.

The testing services available within the Pre-UIT environment and GFI are currently under discussion at TDEG. We recommend that once these services are confirmed, they are documented in the 'Informal testing guide' and that the SEC mandates this documentation. The current understanding of the Pre-UIT environment and testing services is as follows:

- System components involved will be: SEC party; DUGIS gateway; DSP solution; CSP simulator, and no meters will be involved
- Solution will be in-line with DUIS 0.8.1, with 'code drops' and timelines to be confirmed;

- Service Requests will be validated except for the 'digital signature';
- For a pre-selected set of Service requests, the responses will contain a 'standard' payload and the correct signature. Signatures will be generated or 'pre-canned' by the 'CSP simulator'. Other responses will contain a 'zero' payload;
- DCC will provide the Organisation certificate and Device certificate for validating the Service Request response for these pre-selected Service Requests;
- Testing slots in the environment will not need to be pre-booked once initial 'connectivity testing' has been completed and 'unscheduled' access will be available; and
- The environment will be available '24/7', however support will only be required 'Mon-Fri 09:00 to 17:00'.

We agree that these requirements are enduring and hence should be documented in the 'Enduring Test approach document'. However, since there is currently no date indicated for issuing the 'Enduring test approach document' and that the document may not be effective until the completion of 'End to End testing', we recommend that the 'Informal testing guide' defines these requirements in the interim and is issued at least six months prior to the commencement of Informal Testing.

Finally, we do not agree that informal testing services have a limited life (as indicated by Consultation document section 4, paragraph 29) but believe that there will be an ongoing need for a "sandpit" environment to support future development of systems and/or processes.

Informal Testing

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

Yes, we agree with the proposed SEC amendment set out in the letter of direction, with a slight amendment to clause 4(d).

Clause 4(d) states that the DCC and the Testing Participants undertaking Device and User System Testing must each comply with the Enduring Testing Approach Document and such supplemental obligations as the DCC may determine from time to time. However, since the 'Device and User system testing' can now be commenced as part of 'Informal testing' and also be carried out as part of 'End to End testing', we recommend that the testing approach should also be set out in the 'Informal testing guide' and the 'End to End Approach document'.

DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

Q4 Do you agree with our proposals and legal text in relation to the DCCKI PMA Function?

Yes, in principle, and have some further points for clarification.

At this point in time we agree that the DCC should provide the PMA function for the DCCKI. However, we would wish to see this kept under periodic review to ensure that if the DCCKI scope were to change, then the policy could be reviewed.

Whilst there is a responsibility on both the PMA and the DCCKI PMA to review the DCCKI document set, there does not appear to be a process by which the PMA can gain access to any modifications before they are put into effect. We would like to see a process where the PMA are given an opportunity to review any changes before they are submitted for approval by the DCC PMA.

We would also like to raise the following specific points about the content of the licence conditions:

L13.55: we believe that "periodically" is a very subjective timeframe and we would like to see this specified in a more definitive manner in keeping with the rest of the SEC obligations. We would expect to see this document set reviewed on an annual basis in line with the other security documentation.

L13.57: It is unclear from the wording what the intention of this licence condition is. Is the notification a single request from the PMA to the DCC PMA, or is it a request for continuing notification of changes to the document set?

DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

Q5 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?

Yes

Changes to when Communications 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?

Yes

We understood that the original 9 month submission lead time that had been set was a pragmatic approach to dealing with (the then) time constraints that existed. However, since these restrictions no longer apply in light of whichever DCC Live date emerges from the current DCC re-planning exercise, we believe that there is benefit in aligning all Communication Hub Forecast submissions. This consistent approach should help to ensure that effective and efficient processes are established and clearly understood from the very beginning which should encourage transparency and consistency.

However, consideration should be given to the fact that monitoring portfolio volumes may show significant changes between suppliers that could be, in part, driven by Smart installation activities. In turn, this potential volatility could result in longer-term strategies being revisited on a more regular basis in order to ensure optimum roll-out. It should therefore be noted that a 10-month advance forecast in these cases may be more relevant for the short-term rather than the longer-term.

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?

Partially

Whilst we support the proposed changes and will continue to include these metering categories within our current reporting submissions, it is important to note that until smart solutions have been developed for sites currently requiring CT, AMR/ ADM and large gas meters that there can be no smart meter installation figures provided. Submissions going forward then will contain a mixture of 'traditional' and smart rollout statistics. This must be clearly understood and represented within any subsequent analysis so as not to develop and propagate any misleading or unrealistic assessments of success (or otherwise) for these customers.