

**A Consultation on New Smart Energy Code Content – January 2015**  
Siemens Response

**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.**

We agree that if there are changes to the delivery programme then the DCC should be obliged to provide transparency of the implications of these changes to the rest of the industry, particularly in relation to testing timetables. However, we believe that timetable revisions should be shared in a timely fashion to ensure better planning and resource management. The proposed changes to SEC make no safeguards in that there are no minimum notice periods which ensure that SEC parties are able to make suitable provision for changes in the start of 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

We welcome the provision of the Informal Testing environment to DCC Users. Given the testing approach this is an important step to de-risk the delivery of DCC user systems. We would adjust the requirement on the DCC to take all reasonable steps to assist DCC Users (and/or SEC parties) to de-risk their delivery and implementation projects through the provision of informal testing facilities. There is little point in delivering an environment that does not meaningfully mitigate risk. Discussions held in TDEG have on occasions suggested that the Informal Testing environment may not help to reduce delivery risk. We would like to see that this is indeed the objective of this work and that the DCC is measured against this objective. Subject to this we agree that the DCC should be able to set detailed rules.

**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**

No comment

**Q4 Do you agree with our proposals and legal text in relation to the DCCKI PMA Function? Please provide a rationale for your response.**

No comment

**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? Please provide a rationale for your response.**

No comment

**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?**

We agree with an approach which delivers alignment in relation to the timing of initial and subsequent communications hub forecasts.

**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?**

We agree with a requirement to ensure that the preparation of annual milestones includes a breakdown of different metering types and that progress is tracked against these categories.