

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

By email only to: smartmetering@decc.gsi.gov.uk

18 February 2015

Dear Sirs

New Smart Energy Code Content – January 2015

Thank you for the opportunity to respond to the above consultation. This letter should be treated as a consolidated response on behalf of UK Power Networks' three distribution licence holding companies: Eastern Power Networks plc, London Power Networks plc, and South Eastern Power Networks plc. It is not confidential and can be published via the DECC website.

Where appropriate, we have provided answers to the consultation questions in the appendix to this letter and we hope that you will find our comments helpful. If any part of our response requires further explanation or clarification, please do not hesitate to contact me.

Yours faithfully

Copy

Return Address:
Newington House
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London
SE1 6NP



Appendix

New Smart Energy Code Content – January 2015

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.

While we support the intent of DECC's proposal, we believe the legal drafting requires clarification. As currently worded, it is not clear if start dates could be notified to start in advance of any previously agreed dates. Should such a situation occur (for example, where DCC chooses not to use contingency), there may be implications for SEC Parties meeting SEC obligations sooner than anticipated (for example, the provision of registration data).

Q2: Do you agree with the proposed revisions 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.*

Yes, we agree with the proposed provisions as they recognise the less formal nature of informal testing. The strength of the obligation on DCC is appropriate to the type of service being provided and we agree that DCC can propose the detailed rules for the service.

We do however have one observation:

Manufacturers may interpret the GBCS differently to the GBCS Interface Testing (GIT) scripts and where there are differences in opinion the interpretation of the GBCS by the GIT may become the de-facto standards. We recommend that DECC clarifies the status GIT may or may not have in this process for resolving points of interpretation in the GBCS.

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.

The proposed amendments seem appropriate. They support good industry practice and are consistent with other testing set out in the SEC.

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

DECC's proposals and the legal text seem reasonable. They allow for a reasonable management of risk and provide a pathway to incorporate key items into the SEC at the appropriate point.

Q5: Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by 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.

Yes, we agree with this approach. Directing such modifications to the Secretary of State will ensure transparency of process.

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 believe that other SEC Parties (for example, electricity and gas suppliers) are better placed to answer this question.

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 have no specific comments in respect of this question.