

Smart Metering Implementation Programme – Regulation Team  
Department of Energy & Climate Change  
3 Whitehall Place  
London  
SW1A 2AW

10 January 2013

Dear Sir,

Re: **SMIP: Smart Energy Code – URN 12D/406**

Thank you for the opportunity to respond to the DECC consultation on the Smart Energy Code (SEC). Northern Gas Networks Ltd (NGN) operates as the Gas Transporter (GT) for the north of England and Yorkshire with approximately 2.4million domestic and small industrial and commercial businesses connected to 37,000km of pipeline.

NGN has been actively involved in the Smart Metering Regulation Group and specifically the workgroups relating to the Smart Energy Code (SEC) and consequential changes to existing codes. As such we have found the draft legal text to be consistent with expectations. There are two elements which we wish to make further comment upon, these being the obligation on the GTs to provide data to the Data Communications Company (DCC) and the charging elements of the DCC.

#### Data Provision

NGN has raised the Uniform Network Code (UNC) Modification that will permit the Gas Transporters to release data to the DCC. This Modification – UNC0430 – also facilitates the capture of new data items that the DCC will require from gas shippers. We believe that the draft SEC text is broadly consistent with UNC0430 although there are a couple of items where the definitions within the SEC E2.2 are not consistent with the existing UNC defined terms.

Meter Operator within the SEC is considered to be the equivalent of a Meter Asset Manager within the gas industry. The UNC expresses this as being the Registered Meter Applicant within its definitions. We believe that the SEC should be amended to ensure consistency of defined term for this data item.

The Premise/Consumer Type as noted in the SEC is contained with the GT Supply Point Register as the Market Sector Code. This is required to be populated by the gas shipper as either domestic or industrial & commercial. The definition within the SEC for gas purposes should be consistent with the existing UNC defined term.

#### DCC Funding

In our response to the April consultation we noted that any funding by GTs of the DCC should only be for services requested and not for standing charges. While we agree that we will be required to accede to the SEC in order to be obligated to provide registration data, NGN does not anticipate large benefits or demands on the services provided by the DCC. Data for use for demand estimation analysis requires a considerable concentration of smart meters to be rolled out. Furthermore, all costs incurred by GTs are ultimately borne by shippers and suppliers and these costs will be passed on through our transportations charges. As such we continue to believe that it would be more practical and transparent for suppliers to bear the costs of the DCC directly.

I hope you find these comments useful and please contact me should you require further information.

Yours sincerely,