



Department
of Energy &
Climate Change

Smart Metering Implementation Programme

**Government Response to the Consultation on New Smart Energy Code
Content (Stage 2)**

30 January 2014

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General information

Purpose of this document:

This document sets out the Government's response to the consultation on the content of the second stage of the Smart Energy Code, which governs the end-to-end management of Smart Metering in Great Britain.

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Territorial extent:

This consultation response applies to the gas and electricity markets in Great Britain. Responsibility for energy markets in Northern Ireland lies with the Northern Ireland Executive's Department of Enterprise, Trade and Investment.

Additional copies:

You may make copies of this document without seeking permission. An electronic version can be found at <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

Other versions of the document in Braille, large print or audio-cassette are available on request. This includes a Welsh version. Please contact us under the above details to request alternative versions.

Quality assurance:

This consultation has been carried out in accordance with the Government's Consultation Principles, which can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/60937/Consultation-Principles.pdf

If you have any complaints about the consultation process (as opposed to comments about the issues which are the subject of the consultation) please address them to:

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1 Introduction

1.1 The Smart Energy Code

- 1 Smart Meters are the next generation of gas and electricity meters. They will offer a range of intelligent functions and provide consumers with more accurate information, bringing an end to estimated billing. Consumers will have near-real time information on their energy consumption to help them control and manage their energy use, save money and reduce emissions.
- 2 On 23 September 2013, a new licensed entity, the Data and Communications Company (DCC), was established. Together with its sub-contractors, which include, the Data Service Provider (DSP) and Communications Service Providers (CSPs), the DCC will provide Smart Meter communications services through which suppliers, network operators and others can communicate remotely with Smart Meters in domestic premises in Great Britain.
- 3 Following the award of the DCC Licence, the Government designated the first stage of the Smart Energy Code (SEC), including the DCC's charging methodology, on 23 September 2013, which came into effect immediately.
- 4 The SEC is a multiparty contract, which sets out the terms for the provision of the DCC's Smart Meter communications services, and specifies other provisions to govern the end-to-end management of Smart Metering.
- 5 The DCC, suppliers and network operators are required, as a condition of their licences, to become a party to the SEC and comply with its provisions. Other bodies who wish to use the DCC's Services, such as energy efficiency and energy service companies, must accede to the SEC to do so.
- 6 Consistent with other industry codes, the SEC is self-governed, enabling participants to raise change proposals, debate issues, and resolve disputes without the need for day-to-day regulatory intervention. It is managed by a Panel of experts drawn from SEC Parties, with oversight where appropriate from Ofgem.

1.2 Development of the Smart Energy Code

- 7 Following its initial designation, further content for the SEC is being introduced in stages. Some of this content is contained in stage two of the SEC (SEC2), the legal text of which is the subject of this Conclusions Document.
- 8 SEC2 addresses a number of important areas required to aid design, build and test of systems in the run up to System Integration Testing (SIT). These include provisions relating to the provision of registration information, connection to and use of the DCC User Gateway, the enrolment of Smart Metering Systems, requesting the DCC's Services and rules for Service and Incident Management. They also include provisions for the establishment of a technical subcommittee and set out controls that each party will be required to implement to protect the security of the end-to-end Smart Metering arrangements.
- 9 A consultation on the legal text for further content for the SEC, stage three of the SEC (SEC3), opened on 16 December 2013 and closes on 14 February 2014. This addresses the introduction of a Smart Meter Key Infrastructure (SMKI), how companies that operate energy meters on behalf of Suppliers (Supplier Nominated Agents) could access the DCC's Services, and how the DCC and their service providers will be required

to test that their systems interoperate with each other, and that these systems operate together with other energy industry systems.

- 10 A fourth stage of SEC legal text (SEC4) is planned for consultation in summer 2014. We anticipate that this will cover rules related to foundation meters, the provision of Communications Hub Services and further arrangements related to security and SMKI.

1.3 Conclusions on legal text of Stage 2 of the Smart Energy Code

- 11 The Government Consultation on draft legal text for Stage 2 of the SEC was published on 17 October 2013 and closed on 29 November 2013. It set out 21 questions; these are set out in Annex 2, together with a summary of responses.

- 12 There were 24 responses to the consultation across a range of organisations, including:

- Large and small energy suppliers (serving both domestic and non-domestic customers)
- Electricity distribution and gas transportation networks (“network operators”)
- Trade bodies
- Energy data managers and energy code administrators
- Ofgem.

- 13 The full responses to this consultation can be found on the Government website¹.

- 14 Following analysis of comments received in response to questions 1 to 18 of the SEC2 Consultation, and further consideration, some revisions have been made to the SEC drafting which is explained in this conclusions document. Key changes to the legal text include:

- In **Section A (Definitions)** we have tightened the definition of ‘User System’ so that applicable security requirements more clearly focus on systems used to communicate directly with the DCC;
- In **Section E2 (Provision of Registration Data)** we have extended the time period in which Registration Data Providers (RDPs) should be required to provide the DCC with a full refresh of Registration Data to three working days or four calendar days, whichever is the shorter;
- In **Section G1 (General Security)** we have provided for a transitional period to be set, by the end of which parties must comply with updated or replacement security standards;
- In **Section G3 (System Security)** we have removed the requirement for network operators to undertake vulnerability analysis given their limited capability to impact the integrity of data held on Smart Metering devices;
- In **Section G4 (Organisational Security)** we have amended the personnel screening obligations so that they are focussed on User personnel who are authorised to carry out specific activities which have the potential to result in a disconnection of consumers’ energy supply;

¹ <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

- In **Section H3 (DCC User Gateway)** we have amended the months specified for DCC Users to provide forecasts of Service Requests to the DCC, and extended the forecast period from six months to eight months, and provided for reporting of under, as well as over-forecasting. We have also introduced provisions enabling DCC User Gateway Equipment to be relocated;
- In **Section H4 (Processing Service Requests)** we have clarified obligations on DCC in relation to processing service requests to replace DCC credentials on devices and have clarified the checks that need to be undertaken for particular service requests;
- In **Section H11 (Parse and Correlate Software)** we have clarified DCC's obligations to consult with DCC Users as part of the development process;
- In **Section H12 (ICHIS)** we have included a requirement for the DCC to provide a reasonable notice period for the implementation of changes to the ICHIS;
- This document does not conclude on or set out the provisions in **H13 (Service Performance and Reporting)**. This is to give us time to address commercial sensitivities that have been raised in relation to the reporting requirements. Consequently these provisions will be concluded on together with the SEC3 provisions currently under consultation.
- In **Section M8 (Suspension, Expulsion and Withdrawal)** we have amended the SEC1² description of an event of default relating to not taking or requesting DCC's Services so that it does not apply to licenced parties and have deleted a requirement for notices to be provided by post where they have successfully been delivered by fax or email.

- 15 Question 19 of the SEC2 Consultation consulted on four additional provisions intended to provide reliable and economic third party financing options for Communications Hubs. We published our conclusions on these provisions on 16 December 2013³.
- 16 Questions 20 and 21 of the SEC2 Consultation invited views on proposals in relation to Communications Hub asset charges, maintenance charges, and charges following removal of a Communications Hub. We will publish our conclusions on these proposals when we consult on the legal text for charging and provision of Communications Hubs later this year so that the read across to related policies and legal drafting can be more clearly set out and understood.
- 17 Some respondents commented on how the SEC provisions apply to smaller or non-domestic suppliers. Following the consultation we have discussed this further with representative trade bodies for non-domestic suppliers and through various fora designed to engage small suppliers.
- 18 Several of the changes highlighted in paragraph 14 address comments raised by smaller or non-domestic suppliers in relation to SEC2. We are continuing to work with stakeholders to further explore how best the SEC provisions can be designed to apply to non-domestic suppliers who wish to opt out from using the DCC's Services.
- 19 A common question from stakeholders was on how the SEC2 provisions relate to SEC arrangements that are still under development. The following section provides more information on the introduction of SEC2 text into the regulatory framework.

² <https://www.gov.uk/government/consultations/stage-1-of-the-smart-energy-code-conclusions-and-proposal>

³ <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

1.4 Introducing SEC content into the regulatory framework

- 20 We designated the initial SEC1 content into the regulatory framework shortly after concluding on it. However, as part of the SEC2 consultation we recognised that while some content would need to be laid in Parliament immediately, it may be more appropriate for other content to be introduced at a later date. Here we set out our intentions to carry out further work to determine the most appropriate approach for different sections of SEC2 content.
- 21 Having discussed these issues with stakeholders and considered them further, we have concluded that where we propose changes to SEC provisions that are already active, we should seek to implement these immediately. Consequently SEC Parties will not be required to comply with provisions which have been superseded.
- 22 We also recognise that the staged introduction of SEC content means that some SEC content drafted in earlier stages of consultation, may be amended or added to by SEC content drafted in later stages. Other content may be so dependent upon subsidiary documents being developed over a longer timescale that to introduce that content without the subsidiary documents would be of limited value. Consequently SEC2 sections that are closely related to, and in some cases amended by SEC3 sections will not be implemented immediately.
- 23 We continue to consider the staging of SEC development, the following table sets out the SEC2 content that is being implemented now and that which will be implemented subsequently. The table also captures the main topics anticipated for SEC3 and SEC4.

When	What
Introduced in January 2014	<ul style="list-style-type: none"> SEC2 amendments to sections of the SEC that are already designated and in force (changes to Sections A, C, D, E, J, K, M, X) New SEC2 provisions on Parse and Correlate (H11) and ICHIS (H12) as these are relatively 'stand-alone. Currently, we are not aware of any forthcoming changes to these sections as a result of outstanding SEC content. However although introduced into the SEC, these provisions will not be in effect (not 'switched on') as provisions in Section X currently disapply all Section H content.
Introduced subsequently	<ul style="list-style-type: none"> Further SEC2 provisions set out in Sections F, G and H that are closely related to, and in some cases amended by SEC3 provisions. SEC3 content required for Testing, PMA and SMKI. SEC 4 content anticipated to include SMETS1 specific (Foundation) , provision and financing of Communications Hubs

1.5 Guide to annexes of legal text

- 24 The staged introduction of SEC content means that at any point over the next year there could be multiple versions of SEC legal text publically available. The Annexes to this document are designed to address this and clearly demarcate status of individual provisions by showing:
- a version of the SEC which is being implemented in the regulatory framework. Annex 4 shows what the designated SEC1 text, together with the SEC2 changes that are being introduced immediately, will look like once in the

regulatory framework. Annex 5 shows that same text with the insertions, deletions and movements that are being made in change marked form

- a complete version of the SEC which shows all the content, including all SEC2 content, which has been finalised following consultation, but not implemented in the regulatory framework, and SEC3 content which is being consulted on. Annex 6 shows this complete draft in clean form. Annex 7 shows the complete draft SEC in a change marked form showing all the insertions, deletions and movements that have been made since the publication of the SEC3 consultation. It should be noted that the complete version of the SEC may be further amended as a result of conclusions made in response to the ongoing SEC3 consultation.

- 25 At any point in time the version of the SEC that is in legal effect will be that one that is available on the SEC website.⁴
- 26 Where summaries of changes to legal drafting are set out in the main body of this consultation response they refer to numbered provisions in the 'complete' version of the SEC (Annexes 6 and 7).
- 27 The legal drafting set out in the annexes includes a small number of corrections and clarifications to SEC1 text identified as necessary in the consultation document, or identified during the consultation process. These include amendments to Section K9 including a clarification of the debt allocation process in circumstances where two or more parties default in the same month. Two small amendments have also been made in Section M: the first to amend the default rules relating to lack of activity under the SEC (taking DCC's Services) to apply to unlicensed parties only, given that licensed parties are required by licence to be a party to the SEC; the second to clarify that where notices are successfully provided by fax or email, they do not need to be followed up with a postal copy.
- 28 Some amendments have been made to Section A (definitions) and explanations for these are provided in this document in the context of the SEC provisions to which they relate.
- 29 Every effort has been made to ensure the explanatory text in the main body of this consultation response reflects the legal text set out in the Annexes. However, whilst we have sought to ensure that the explanatory text provides a clear and simplified overview of our proposals, the legal drafting should be treated as the definitive text.
- 30 The remaining sections of this document summarises the responses to the SEC 2 consultation, our conclusions and any amendments made to the legal text.

⁴ <https://www.seccoltd.com/home>

2 Technical Governance and Change Control

Summary of Issue under Consideration

A Technical Sub-Committee (TSC) will be established by the SEC Panel to provide it, the Change Board and Working Groups with support and advice on technical matters. This will include advice on proposed modifications to the technical specifications and any other modifications to the SEC which are likely to affect the end-to-end technical architecture. The TSC will also have a responsibility for reviewing the effectiveness of the end-to-end technical architecture and support the SEC Panel in the technical aspects of its annual report. Where requested by the SEC Panel, it will advise Ofgem on technical aspects of any notification to the European Commission of changes relating to technical standards, and provide support to the SEC Panel on disputes concerning the technical specifications.

Question 1 sought views on the proposed SEC drafting for Technical Governance and Change Control.

Government Consideration of Issue

- 31 The majority of respondents to the consultation question on technical governance and change control confirmed their support for the creation of the TSC and broadly agreed with the proposed SEC legal drafting.
- 32 The key area of concern was the way in which the composition of the TSC would be determined. Some respondents questioned whether the SEC Panel would have the requisite expertise to determine the optimum balance of membership in terms of industry representation and relevant expertise. The need for members to act with impartiality and not as a delegate was also raised.
- 33 We have confidence that the SEC Panel will have the capability to identify the correct expertise for the TSC, both in terms of the SEC Panel membership's collective industry knowledge and experience and the extent of specialist advice to which it will have access. Furthermore, the SEC sets out general provisions for sub-committees, which will provide minimum standards for the membership and operation of TSC. This will include a requirement for sub-committee members to act independently.
- 34 The Code Administrator, SECAS, will monitor modification proposals, making the TSC aware of any that are likely to affect the end-to-end Technical Architecture. Some respondents questioned whether SECAS would have the technical ability to determine which modifications should be brought to the attention of the TSC. The proposed SEC drafting will require the TSC to establish a process whereby the SECAS identifies which modification proposals should be considered by the TSC. We believe that the TSC will be best placed to decide what form this process should take.
- 35 The SEC Panel will also establish Working Groups to consider modification proposals relating to technical specifications. Clarification was sought on the relationship between these and the TSC. We agree that the relationship between these bodies will be an important one. We have therefore added clarification that Working Groups should not duplicate the experience and expertise available in the TSC.
- 36 One respondent commented that it was important that the views of the TSC on modification proposals are properly taken into account in the SEC modification process. We agree and have added a requirement for the Modification Report to include a summary of any views provided by the TSC in respect of the modification proposal.

- 37 Clarification was also sought on the obligation to maintain the Technical Architecture Document (TAD). It was noted that the SEC drafting did not explicitly provide for this document to be created. The obligation will therefore be amended for the TSC to develop and thereafter maintain the TAD.

Summary of Government Conclusion

The majority of respondents agreed with our proposed SEC drafting for Technical Governance and Change Control. Minor adjustments to the SEC drafting however will be made. The SEC Panel will be required to take account of the existence of the TSC when establishing Working Groups, which are to consider modification proposals relating to technical specifications. The modification report will have to note and reflect any advice from the TSC and the TSC will also be obliged to develop and maintain the TAD.

Summary of Changes to Legal Drafting

SEC Section	Content
D: Modification Process	<ul style="list-style-type: none"> • Any Working Group that is established to consider a Modification Proposal should not duplicate the experience and expertise available to it via the TSC (section D6.3). • A requirement has been added (section D7.3) for the Modification Report to include a summary of any views provided by the TSC in respect of the Modification Proposal pursuant to Section D6.8(e).
F: Smart Metering System Requirements	<ul style="list-style-type: none"> • A requirement has been added for the TSC to develop and thereafter maintain the Technical Architecture Document (section F1.4) • A requirement has been added for the TSC to provide the Panel with support and advice in respect of any other matter concerned with the End-to-End Technical Architecture which was not previously expressly referred to (section F1.4).

3 Registration Data

Summary of Issue under Consideration

The SEC includes high level obligations on the DCC and the Registration Data Providers (RDPs) for Registration Data exchange. The DCC uses Registration Data to confirm that a DCC User is authorised to take specified services in relation to a particular device, and to calculate charges for the use of its services.

SEC2 legal drafting contains additional detail to support these high level obligations, including the requirements for a Registration Data Interface Specification, and associated Code of Connection. Together, these documents will provide both a technical specification for the interface, and set out its operational aspects, the frequency, format and method of Registration Data exchange, and procedures for exception handling.

Question 2 sought views on the proposed SEC drafting for Registration Data. In addition, Question 3 sought views on the way in which the DCC should estimate the number of non-domestic meter points registered to DCC Users as a basis for calculating charges, and Question 4 sought views on the time period in which RDPs should be required to provide the DCC with Registration Data refreshes.

Government Consideration of Issue

- 38 Of those responding to Question 2, the large majority agreed that the SEC drafting was appropriate with respect to Registration Data. Respondents proposing alterations tended to focus on the need to ensure the SEC drafting is consistent with, or takes into account, other relevant codes.
- 39 In particular, respondents highlighted some inconsistencies in the terms used in the SEC drafting under consideration, and those that appear in the Master Registration Agreement (MRA). We acknowledge the importance of ensuring the SEC and other energy codes are consistent in setting out requirements relating to Registration Data. We intend to review the relevant sections of the SEC (E2.1 and E2.2) to ensure they are consistent with other codes. We will work with the DCC, RDPs and other stakeholders to incorporate any amendments in subsequent revisions of the SEC, alongside the consideration of the Registration Data Interface documents that are currently under development.
- 40 We recognise that further consequential changes to align the SEC and other energy codes may be needed as the operational requirements for the management of Registration Data are finalised. The SMIP Transitional Regulation Group will be utilised to support industry in considering how and when any changes to other codes will be delivered.
- 41 Several respondents suggested that disputes may need to be resolved through cross-code liaison or joint code working in order to achieve an efficient resolution. There is currently no specific obligation on the SEC Panel to work together with other panels, committees and administrators to resolve disputes.
- 42 We agree with the suggestion that disputes (on registration and other matters) may be resolved more efficiently through joint working or cross-code liaison. The SEC drafting has therefore been updated to include a new obligation on the SEC Panel to work with other code governing bodies, when resolving a dispute which relates to one or more disputes under other energy codes (section C2.3).

- 43 The majority of respondents to Question 3 supported the use of profile class data as a proxy to estimate the number of non-domestic meter points registered to users.
- 44 We recognise that the use of any proxy in calculating charges for the DCC's fixed costs is not ideal. An accurate data item capturing whether a meter point was domestic or non-domestic, would be the most appropriate mechanism by which to allow the DCC to do this. However, we also recognise that there are implementation and cost challenges that would accompany any action by industry to develop a change to registration systems to enable such a data item.
- 45 In addition, and as noted by one small-supplier, there is scope for suppliers to alter profile class for a meter point where it does not accurately reflect the type of usage at a meter point. This would improve the data-quality of profile class as an indicator of use.
- 46 Some respondents remarked on the potential impact of the use of profile class data, should the DCC use it for access control purposes. For clarity it should be noted that the DCC will not use profile class data for access control purposes. Profile class data will only be used by DCC for the purposes of calculating charges.
- 47 Therefore, we have concluded not to introduce a provision in the SEC, which would require industry parties to develop a new domestic or non-domestic indicator in Registration Data for the purposes of calculating DCC charges. We will additionally remove the requirement for the DCC to be provided with this information directly from suppliers. This is because the DCC does not currently have the capability to process this additional data, and it could therefore lead to a requirement to alter the DCC's Service Provider contracts (with corresponding costs) to support this.
- 48 The majority of respondents to Question 4 disagreed with the proposal that RDPs should provide a 'data refresh' request within two calendar days. Respondents offered a range of alternative suggestions for time periods, from one calendar day through to 15 working days for the provision of a full refresh of data.
- 49 Several respondents noted that shorter times may be possible for partial refreshes of data, compared to full data refreshes. Those stakeholders suggesting a longer time period for a full data refresh (defined either as calendar days or working days), noted that such a time period would be more reflective of the capability of current industry systems. However, those who agreed with the consultation proposal or suggested a shorter timeframe, noted that access to correct registration data is an essential component of the DCC's service provision.
- 50 Limited quantitative information was provided in responses to enable a thorough analysis of a timeframe under which a full refresh could be provided. Although one electricity network operator did note that on average a full refresh would take 56 hours to generate (i.e. in excess of the two calendar day window suggested). In addition respondents did not provide any quantitative information on the cost of the system changes that would be necessary to allow a full refresh to be provided within two calendar days, nor details of what the system changes would involve.
- 51 It should be stressed that the rapid requirement for a full refresh would be an exceptional event, to be called in the very unlikely scenario whereby the DCC's business-as-usual processes have failed and their other available data recovery mechanisms have also failed. In determining the correct approach for the rapid provision of a full data refresh, it is also important to consider that the DCC is expected to take on the management of

Registration Data across both gas and electricity in due course⁵. Any significant changes to systems to support the rapid provision of a full data refresh may therefore only be applicable for a limited amount of time, which has a bearing on the cost-effectiveness of an obligation which would necessitate systems development. Coupled to this, in terms of continuity of service delivery, the SEC drafting (E2.12) enables the DCC to use data it holds prior to the identification of any errors or omissions should errors arise. We have clarified the drafting in this area.

- 52 Balanced against these considerations, a period that is unnecessarily long poses a risk to the DCC being able to offer services based on correct information. Consequently, this could risk a positive consumer experience, and ultimately affect the business case for Smart Metering delivery.
- 53 We have therefore sought to deliver an outcome where the DCC can access the data it needs in the quickest time possible, but without needing costly changes to existing registration systems to respond to Incidents that are likely to be rare occurrences, and only apply for a limited period. We have also noted the comments highlighting the potential for a selective or partial refreshes as a quicker solution to ensuring that DCC data is aligned.
- 54 We have therefore amended the SEC to require that RDPs, when requested, use all reasonable endeavours to provide a full refresh of data as soon as is reasonably practicable. We have additionally included a backstop provision for this data to be provided within, whichever is the shorter, of three working days or four calendar days.
- 55 This reflects the evidence we received on the technical feasibility of providing the necessary data without requiring changes to systems, and should not therefore involve significant upfront costs for industry. However, we recognise that limited evidence was received in response to this consultation. Industry may bring forward further evidence via the SEC modification process and Ofgem's active involvement in these considerations will be important, given their responsibility for wider cross-code issues and role in the SEC modification process.
- 56 We have also amended the SEC to require that the Registration Data Incident Management Policy⁶ document should include the details of the processes and timetables for requesting and providing data refreshes where Incidents occur, including the approach to selective or partial refreshes in light of views expressed that they may provide a quicker solution to full data refreshes. This is in order to allow RDPs flexibility to provide the most appropriate data to resolve the issue (be that via full or selective refreshes, or some other means). The DCC is currently preparing a draft of this document and should this require further changes to Section E we will consult upon those in due course.

Summary of Government Conclusion

On Question 2: The majority of respondents agreed with our proposed SEC drafting for Registration Data. However, as a result of comments received, we have obliged the SEC Panel to work with other code governing bodies when resolving a dispute which relates to other energy codes.

⁵ This matter is currently being considered by Ofgem as part of their Smarter Markets Programme

⁶ The DCC will be required under the SEC (Section X2.4 (g)) to develop the Registration Data Incident Management Policy, in consultation with RDPs and SEC Parties

On Question 3: The majority of respondents wanted the DCC to continue to use profile class data as a proxy to estimate the number of non-domestic meter points registered to Users. We will therefore not be requiring that a new data item is provided to the DCC. We will be deleting the obligation placed on electricity suppliers to provide data on non-domestic premises.

On Question 4: The majority of respondents disagreed on the length of the 'data refresh' request period. We have amended the SEC to require RDPs to undertake all reasonable endeavors to provide the DCC with data as soon as is reasonably practicable, with a backstop of whichever is the shorter of three working days or four calendar days. We have also included a requirement that the Registration Incident Management Policy includes further details on the management of data refreshes.

Summary of Changes to Legal Drafting

SEC Section	Content
C: SEC Panel	<ul style="list-style-type: none"> A new obligation to require the Panel to work with other code governing bodies when resolving one or more disputes which also relate to other Energy Codes (section C2.3).
E: Registration	<ul style="list-style-type: none"> Electricity suppliers will not be required to provide information on Import and Export suppliers for a Non-Domestic Premises (section E2.3 has been deleted from the SEC and consequential changes have been made in E2.7) A minor amendment to section E2.6 has been made for clarity. Section E2.8 has been revised to specify that where a full refresh is requested, RPDs must use all reasonable endeavors to provide this data to the DCC. As a backstop this should be provided within whichever is the shorter of three working days or four calendar days. An amendment has also been made to note that processes to raise and resolve Incidents where refreshes are required will be set out in the Registration Data Incident Management Policy. A minor amendment to E2.12 has been made for clarity. An obligation for the Registration Data Incident Management Policy has been included to set out a timescale and process for providing a selective or partial refresh of data. (Section E2.12)

4 DCC's Services

4.1 DCC User Gateway

Summary of Issue under Consideration

All Service Requests and other communications passing between the DCC User and Smart Metering Devices will transfer through the DCC User Gateway. SEC2 legal drafting sets out the proposed operation of the DCC User Gateway, and the manner in which DCC Users will connect to it. The DCC is required to document the technical and operational details in (respectively) the DCC User Gateway Interface Specification (DUGIS) and the DCC User Gateway Code of Connection.

Question 5 sought views on the proposed SEC drafting for the DCC User Gateway.

Government Consideration of Issue

- 57 The majority of respondents to this question were in agreement with the SEC drafting set out in the consultation. We have therefore concluded that the SEC drafting with regards to the User Gateway is appropriate and clearly sets out the rights and obligations of the DCC and the DCC Users.
- 58 A number of respondents felt that there should be arrangements in place that enable the Gas Transporters (GTs) to interface with the DCC via an agent acting on their behalf. We have held initial discussion with GTs on this issue and have asked for further information in relation to the proposal to be provided. On receipt of this information we will consider this issue further.
- 59 The DCC is currently developing its proposals for the User Gateway Code of Connection. It is likely that, as a result of those proposals, further changes will need to be made to Section H of the SEC. We will consider whether such changes are required following the production of the draft of the User Gateway Code of Connection subsidiary document.
- 60 Minor changes have been made to section H1- User Entry Process, with respect User Role Eligibility, User Role IDs and DCC IDs. These changes were mainly clarify the process.

Summary of Government Conclusion

The majority of respondents were supportive of the DCC User Gateway obligations set out in the consultation. The proposals in this area remain unchanged, subject to some minor drafting amendments.

Summary of Changes to Legal Drafting

SEC Section	Content
H1: User Entry Process	<ul style="list-style-type: none"> Minor changes to the User Entry Process (section H1).
H3: User Gateway	<ul style="list-style-type: none"> New provisions have been added to deal with circumstances in which DCC Users need to relocate equipment (section H3). There are a few minor changes in relation to the User Gateway (section H3.20).

4.2 DCC User Gateway Services and Service Request Processing

Summary of Issue under Consideration

The SEC sets out the services which the DCC is required to provide through the User Gateway, and the eligibility of DCC User Roles to send particular Service Requests. The format for Service Requests will be set out in the DCC User Gateway Interface Specification (DUGIS).

The SEC also sets out how DCC Users may schedule and sequence Services Requests; the steps that the DCC and the DCC User requesting the service must follow to process Service Requests; the response times for both 'on demand' and 'future dated' Service Requests; and the eligibility and security checks that the DCC and the DCC User must carry out; Finally, the SEC also sets out the interim procedures for replacing the relevant Supplier's Security Credentials on Devices when there is a Change of Supplier related Service Request.

Question 6 sought views on the proposed SEC drafting for the DCC User Gateway Services and Service Request Processing.

Government Consideration of Issue

- 61 Respondents were generally supportive of the proposed SEC drafting. Save for a few minor textual changes, we have therefore concluded that the SEC drafting proposed for DCC User Gateway Services, will be adopted and form part of the future SEC regulatory framework.
- 62 In addition to a few minor textual changes to reflect respondents' suggestions to Service Request Processing, we introduced additional provisions to clarify further how the processing of Service Requests that result in the replacement of credentials on Devices should be carried out by the DCC. It is important to highlight that these additional provisions do not result in additional DCC obligations, but merely clarify what checks the DCC should perform on receipt of such Service Requests.
- 63 These additional provisions are relevant to the following Service Requests: 'CoS Update Security Credentials', 'Update Security Credentials' and 'Request Handover of DCC Controlled Device'. Appropriate control of these Service Requests by the DCC is paramount in ensuring the security of communication. This is because these Service Requests are all 'Critical' and all may result in the sending of a Command to a Device which is signed by a person who is not the originator of the initial Service Request.
- 64 One respondent stated that access to the DCC's Smart Metering Inventory data should be restricted to DCC Users that have an interest in a particular meter point, as unconstrained access could have negative consequences. It is our view that unfettered access to the Inventory by all DCC Users will support a number of aspects of Smart Metering. It will facilitate the change of supplier process, by enabling the incoming supplier to know what equipment is already installed at particular premises. The current access arrangements will support energy efficiency by enabling companies to tailor their services to consumers with Smart Meters.
- 65 Further, it is our current understanding is that a DCC User will need to send a separate Service Requests to obtain data on each individual meter point. Therefore, if a DCC User wanted data on 20 meter points it would have to submit 20 separate service requests, which will each attract a charge. Based on this we consider that there will be limited risk of negative consequences should all DCC Users have access to the inventory.

- 66 In order to enable all DCC Users to provide tailored services, in particular energy efficiency services to consumers, they will need to know whether a Smart Meter (and associated devices) had been installed. Therefore, this arrangement could promote competition in providing a range of services to consumers. Additionally, this arrangement will underpin an efficient installation process, especially in premises where the gas and electricity are provided by different Suppliers, as the second Supplier will be able to determine whether a functioning Communications Hub and/or In Home Device (IHD) is already present at the premises.
- 67 The DCC is currently developing its proposals for the DUGIS. Following the production of the draft of the DUGIS subsidiary document, we will consider whether any changes are required to Section H of the SEC and the most appropriate process for amending it.
- 68 An explanation of the DCC User Gateway Services Schedule was provided as part of the SEC2 consultation document. A revised draft of this Schedule is attached to Annex 3. This draft Schedule will need to be updated to align with the further development of the GB Companion Specification and the User Gateway Interface Specification. A further draft will be published along with the Government response document on the SEC3 consultation.
- 69 The SEC3 consultation document discussed the treatment of MOPs and MAMs under the SEC. This version of the Schedule includes services that would be available to a new category of User Role, Supplier Nominated Agent (SNA), if the third option outlined in the SEC3 consultation paper is adopted (i.e. if MOPs and MAMs become SEC parties and take services in this new User Role).
- 70 In addition, it has now been clarified that the costs associated with the management of device and DCC Alerts will be included in the DCC's fixed costs.

Summary of Government Conclusion

Respondents generally agreed with our proposed SEC drafting for DCC User Gateway Services and Service Request Processing. Save for a few minor changes and the addition of text explaining the treatment of Service Requests that result in the replacement of security credentials held on Devices, the SEC drafting proposed will be adopted.

Summary of Changes to Legal Drafting

SEC Section	Content
H3: User Gateway	<ul style="list-style-type: none"> There are a few minor changes to User Gateway (section H3D)
H4: Processing Service Request	<ul style="list-style-type: none"> H4.18 to H4.24 set out the steps to be taken by the DCC in processing a 'CoS Update Security Credentials' Service Request following receipt of a valid Service Request from a DCC User. H4.25 to H4.27 set out the steps to be taken by the DCC in processing a 'Handover of DCC Controlled Device' Service Request following receipt of a valid Service Request from a DCC User. H4.30 sets out the timings for processing of , a 'CoS Update Security Credentials' Service Request.

4.3 Parse and Correlate

Summary of Issue under Consideration

All Service Requests, associated Responses and other communications passing between the DCC User Gateway and the DCC User will need to be in a standard, easily interpreted format. However, messages to and from Smart Metering Devices will be in 'HAN Ready' format. Parse and Correlate Software will be required to facilitate translation and checking between the two formats.

SEC provisions will oblige the DCC to provide the Parse and Correlate Software to all DCC Users, offer support services and address any Incidents associated with this service provision as part of its Incident Management regime.

Question 7 sought views on the proposed SEC drafting for Parse and Correlate.

Government Consideration of Issue

- 71 The majority of respondents to this question agreed with the proposed SEC drafting, although approximately half of them caveated their response. The key concern raised regarded the continuing interoperability of the Parse and Correlate Software with the DCC User Gateway Interface. Respondents highlighted the need to ensure the Parse and Correlate Software aligned with any subsequent versions of the DUGIS.
- 72 The SEC (section H11.5) will require the DCC to ensure at all times that the software it provides to DCC Users is able to convert (Parse) Responses and Alerts into the agreed format and compare (Correlate) Pre-Commands received from the DCC against the corresponding Service Request. If the software is not capable of doing so, for example because it is not aligned with the most recent version of the DUGIS, the DCC will be in breach of this obligation. Therefore it is the DCC's responsibility to ensure that the Parse and Correlate Software is interoperable with the DUGIS at all times.
- 73 Respondents were also concerned about the lack of a release management process in relation to the Parse and Correlate Software. Other issues raised by respondents included:
- the cost of the DCC supporting a large number of software versions;
 - the continuous need to upgrade, particularly at short notice (e.g. in the case of emergency changes); and
 - the internal cost associated with frequent upgrading.
- 74 Notwithstanding an obligation on the DCC to develop and provide new versions of the Parse and Correlate Software when it is necessary to do so, the DCC is required by its licence to provide an efficient, economical, co-ordinated, and secure system in offering services under the SEC. This includes identifying when it is appropriate to develop and release another version of the Parse and Correlate Software. To further address stakeholders' concerns regarding identifying the need to upgrade, DCC obligations in relation to having a consultation process with DCC Users when the software is developed will be extended to require the DCC to consult with DCC Users on the need for a new version of the Parse and Correlate Software. This extension to the DCC obligations will ensure that the interests of all SEC Parties are represented in this process.
- 75 Versions of Parse and Correlate Software will naturally become redundant when they are no longer aligned with the DUGIS. At this point they would not be able to be used for converting Service Responses and Alerts into the agreed format and comparing Pre-

Commands received from the DCC with the corresponding Service Requests. This coupled with a robust process for identifying the need for a new version, means that the DCC is not expected to:

- support a large number of versions at any point in time; and
- provide DCC Users with new versions without a confirmed need for one.

- 76 It is worth noting that DCC Users will not be compelled to upgrade every time the DCC releases a new version of the Parse and Correlate Software. However, DCC Users will need to satisfy themselves that by not upgrading they are able to continue to receive DCC's Services and remain compliant with their obligations.
- 77 In response to concerns raised about the need for a robust release mechanism, including in relation to emergency releases, DCC obligations in respect of planning, scheduling and controlling of releases will be extended to include the Parse and Correlate Software. This will ensure that the DCC is subject to uniform obligations in respect of any IT update it releases to DCC Users.
- 78 Security related considerations were commented on by several respondents. These included:
- whether providing the software to 'any persons' introduced an unnecessary risk to the software provided by the DCC; and
 - requirements on the DCC to investigate any vulnerability identified.
- 79 Constraining the availability of the Parse and Correlate Software to just SEC Parties may limit the ability of third parties (such as software developers) to provide market based software services benefiting DCC Users. Any risks associated with the wide availability of the software (e.g. in relation to it being tampered with in transit), will be offset by the DCC providing recipients of the Parse and Correlate Software with a means to verify the software's authenticity and integrity on receipt. Any DCC User taking advantage of the market based software services will separately need to consider any risks associated with taking these services on the Parse and Correlate Software held on its systems and its systems more generally.
- 80 DCC obligations in respect of managing Incidents already extend to services associated with the provision of the Parse and Correlate Software (see H9). In addition to these obligations, the DCC will be required to notify DCC Users and the developer of the software when it is made aware of a security vulnerability. This will ensure that DCC User systems are not inadvertently exposed to security vulnerabilities.
- 81 Clarification on the level of independent assurance that the Parse and Correlate Software will be subject to during testing was also requested. In addition to the DCC ensuring that the Parse and Correlate Software is adequately tested, it also needs to provide opportunities for Acceptance Testing to DCC Users, as well as ensure that the software is subject to a software code review. These provisions are aligned with industry good practice.
- 82 Respondents also sought clarity on costs associated with usage of protocols. Costs associated with the Parse and Correlate Software (with the exception of 'Further Assistance' see H11.9 – H11.13) are fixed in the DCC charging model. These are shared across DCC Users based on a per meter point market share. Currently no royalties are due for use of ZigBee or DLMS. If this changes and results in such royalties being passed through by the DCC to DCC Users, the DCC will notify the SEC Panel.

- 83 The lack of an Escrow related obligation on the DCC for the Parse and Correlate Software source code was raised by one respondent. The respondent enquired why the DCC was not obligated to establish a third party arrangement between the DCC and DCC Users governing storage and distribution of the Parse and Correlate Software source code. DCC Business Continuity arrangements, including any appropriate Escrow arrangements, are currently being considered. This includes whether the Parse and Correlate Software source code should be subject to any Escrow arrangements. We will consult on all Business Continuity arrangements, including Escrow, in future SEC consultations.

Summary of Government Conclusion

All respondents were largely supportive of the Parse and Correlate obligations set out in the consultation. As a result we will retain the SEC drafting as proposed bar some minor alterations.

Summary of Changes to Legal Drafting

SEC Section	Content
G: Security	<ul style="list-style-type: none"> The DCC now has Additional obligations to notify Users and the developer of the Parse and Correlate Software when the DCC becomes aware of a security vulnerability in respect of the software (section G2.30 and G2.31)
H: Parse and Correlate Software	<ul style="list-style-type: none"> The DCC now has additional obligations to consult with DCC Users on the need for a new version of the software and the impact that new version will have on the security of the DCC and User Systems; and following the consultation, confirm to DCC Users what the software design will be (section H11.6 and H11.7). H11.8 requires the DCC to ensure that the version of the Parse and Correlate Software is adequately tested to ensure that it meets the design specification.
H: Service Management, Self-Service Interface and Service Desk	<ul style="list-style-type: none"> The DCC now has an additional obligation to manage the Parse and Correlate Software release (section H8.9).

4.4 Enrolment, Withdrawal and the Smart Metering Inventory

Summary of Issue under Consideration

The DCC will maintain a Smart Metering Inventory, which will list all Devices that are Commissioned⁷, or intended to be Commissioned, in the DCC as part of an Enrolled Smart Metering System, or which have subsequently been withdrawn or decommissioned. The DCC will only be able to communicate with Devices that have been commissioned with it (other than communications specifically for the purposes of commissioning).

SEC2 legal drafting requires the DCC to establish and maintain the Smart Metering Inventory. It sets out the requirements for pre-notification and commissioning of Devices the associated Enrolment of Smart Metering Systems and also for withdrawal and decommissioning. Under some (limited) circumstances, the DCC will not be obliged to commission a Device.

SEC2 legal drafting also provides for Local Command Services, to allow Commands to be returned to DCC Users for downloading onto a Hand Held Terminal (HHT).

Question 8 sought views on the proposed SEC drafting for Enrolment and the Smart Metering Inventory.

Government Consideration of Issue

- 84 All respondents were largely supportive of the Enrolment and the Smart Meter Inventory obligations set out in the consultation. Several respondents highlighted that the detailed solution design is being developed concurrently and that SEC drafting may need amendment in future to align with the solution.
- 85 A respondent commented that provisions had been included in the SEC in relation to the 'install and leave' process (i.e. the capability for Devices to have a status of 'installed not commissioned'⁸ in the Smart Metering Inventory), but that industry discussions on the use of the install and leave process were ongoing. We will likely to set out our views on the operation of install and leave later this year.
- 86 In the meantime an inventory status of 'installed not commissioned' has been provided to allow for instances where the DCC's SM WAN may not be available (either temporarily or permanently). NB this status of 'installed not commissioned' applies only to the stage between a device first being installed and prior to first establishing WAN connectivity.

⁷ Section H5 of the SEC sets out the process for Commissioning Devices, such that they are capable of sending and receiving communications to and from DCC. A Smart Metering System is "Enrolled" when the Devices that form part of it are all Commissioned and their inter-relationships recorded in the Smart Metering Inventory. An Enrolled Gas Smart Metering System comprises a Communications Hub Function, a Gas Smart Meter, a Gas Proxy Device and any Type 1 Devices associated with the meter, whereas an Enrolled Electricity Smart Metering System comprises a Communications Hub Function, an Electricity Smart Meter and any associated Type 1 Devices.

⁸ When the meter and communications hub are installed, they will automatically be commissioned via a signal from the meter to DCC. However, where the metering system is installed, but the WAN cannot be connected, a supplier deciding to proceed with the installation will advise the DCC that the metering system has a status of "installed not commissioned". When WAN coverage becomes available, the meter will be able to communicate with DCC and the enrolment process will take place.

Summary of Government Conclusion

All respondents were largely supportive of the Enrolment and the Smart Meter Inventory obligations set out in the consultation. As a result we will retain the SEC drafting as proposed, subject to some minor clarifications. We will set out our views on the operation of install and leave later this year as appropriate.

Summary of Changes to Legal Drafting

SEC Section	Content
H5: Smart Metering Inventory and Enrolment Services and H6: Decommissioning and, Withdrawal and Suspension of Devices	<ul style="list-style-type: none"> • Additional drafting has been added to require that network operators are informed where changes to inventory data that affect the relationship of a device ID and MPXN are made (H5.11 and H5.20(e)). • Provision has been made to require that the Gas supplier is informed, where it is reasonable to do so, prior to the replacement of a Communications Hub (H6.15). • Minor clarifications to the text elsewhere.

4.5 Communications Hub: Intimate Physical Interface

Summary of Issue under Consideration

As set out in the Communications Hub Technical Specifications (CHTS), the DCC is required to procure a Communications Hub, which is powered via an Intimate Physical Interface. The interface will either connect directly to the Smart Meter, or (in a small number of circumstances where this is not possible), via a 'hot shoe' to an unmetered power supply. The interface will be specified in the Intimate Communications Hub Interface Specification (ICHIS).

SEC2 legal drafting sets out the requirements that ICHIS must meet. It also places an obligation on the DCC to maintain the document on an ongoing basis, consulting with SEC Parties in doing so, to publish it on its website and to make it freely available.

Question 9 sought views on the proposed SEC drafting for the Intimate Physical Interface and ICHIS.

Government Consideration of Issue

- 87 The majority of the respondents agreed that the proposed approach is appropriate, as interested parties will be provided with the opportunity to input into the development and maintenance of the ICHIS.
- 88 Some respondents argued that the SEC should require that appropriate notice is provided before new versions of the ICHIS are implemented. This has been reflected in the revised drafting.
- 89 Others suggested that the ICHIS should not be made freely available as they think this could present a security risk. We do not agree with this assessment as the ICHIS should not include any information that would compromise the security of the end-to-end system. In addition, we believe that in order to encourage an open and competitive market it is important that the ICHIS to be freely available on the DCC website.
- 90 Two respondents suggested that it was not necessary for the ICHIS to define an interface between the Communications Hub and a Smart Gas Meter. These respondents also suggested that the requirement for ICHIS to 'define the data interface' should be amended to 'define the physical data connectors', as it is not intended that the ICHIS defines the communications standards used in Smart Metering Systems.
- 91 Our understanding is that none of the currently available Smart Gas Meters could be used to power the Communications Hub. However, the requirement that the ICHIS defines the interface with Smart Gas Meters, as well as Smart Electricity Meters, is intended to allow innovation in the market. We agree that the ICHIS should define the data connectors rather than the data interface and will amend the SEC to reflect this. It should be noted that the SEC does not provide a detailed description of the functionality included in the ICHIS. However should it be considered appropriate for this to be the case in the future, the SEC modifications process will allow SEC Parties to propose modification to the SEC to include a description of the functionality for inclusion in the ICHIS.
- 92 Two respondents suggested that the SEC should define the operational arrangements for the hot-shoe, especially at change of supplier. However, no evidence was provided to suggest that existing industry practices, that support operational arrangements relating to meters upon change of supplier, were inadequate in the context of the hot-shoe. On this

basis, we do not consider that the issue requires further regulation to address it. However should existing practices prove inadequate in the future, modifications to the SEC can be proposed at that time.

Summary of Government Conclusion

All respondents were largely supportive of the ICHIS obligations set out in the consultation. With the addition of some minor clarifications and a requirement to provide reasonable notice of the implementation of a revised ICHIS, we consider the proposed ICHIS requirements appropriate.

Summary of Changes to Legal Drafting

SEC Section	Content
H: ICHIS	<ul style="list-style-type: none"> • Minor amendments to reflect that the ICHIS will define the physical data connectors rather than the data interface (section H12.2). • Amendments to require DCC to consult on the implementation timeline and to provide reasonable notice before a new version of the ICHIS is brought into force (section H12.6, H12.7, H12.8 and H12.9). • Removal of reference to DCC Licence to avoid duplication of requirements (sections H12.7, H12.8 and H12.9).

4.6 DCC Service Management

Summary of Issue under Consideration

The DCC will be required to undertake Service Management, in line with the principles of the IT Infrastructure Library® (ITIL), to ensure its systems and processes continue to operate effectively and efficiently. This will include a requirement to undertake maintenance activity from time to time.

Changes to the DCC's Systems will be driven either by SEC modifications, or by the DCC's need to update or maintain its internal systems. The SEC Panel will be required to prepare a Panel Release Management Policy to deal with the former, and the DCC, a Release Management Policy to deal with the latter. DCC Users must be consulted in the preparation of both documents, which will include the mechanism for setting priorities for different types of releases, periods of change-freeze, and notice periods to DCC Users of any release.

Question 10 sought views on the proposed SEC drafting for DCC Service Management.

Government Consideration of Issue

- 93 Those that responded to this question all agreed with the approach to Service Management set out in the SEC drafting, with some expressing explicit support for the alignment with ITIL. With the addition of some minor clarifications, we consider the proposed SEC drafting for Service Management is appropriate.
- 94 There were a number of comments concerning Planned Maintenance. This area will be amended, to add an obligation on the DCC to consider requests to reschedule Planned Maintenance in times of severe weather. The total allowable downtime for maintenance will be increased to reflect the fact that the DCC will need to schedule downtime for multiple Service Providers. The SEC drafting will also be amended to specify the threshold below which the DCC may carry out Planned Maintenance without including it in the Planned Maintenance schedule.

Summary of Government Conclusion

All respondents were largely supportive of the DCC Service Management obligations set out in the consultation. With the addition of some minor clarifications, we consider the proposed SEC drafting for Service Management is appropriate.

Summary of Changes to Legal Drafting

SEC Section	Content
A: Maintenance	<ul style="list-style-type: none"> The definitions of Planned Maintenance and UnPlanned Maintenance have been extended to specify 'disruption' for the purposes of maintenance (section A1.1), which aligns with the DCC's Service Provider contracts.
H: DCC Service Management	<ul style="list-style-type: none"> H8.3 has been revised to increase the limit on Planned Maintenance. H8.4 has been expanded to allow the Panel to request rescheduling of Planned Maintenance to allow for severe weather.

4.7 Incident Management

Summary of Issue under Consideration

An Incident is any event which has caused, or may cause, a reduction in service provision and/or quality.

SEC2 legal drafting requires that the DCC develop an Incident Management Policy, in conjunction with SEC Parties, to reduce the risk of, and manage any lack of continuity in service provision. The Incident Management Policy will set out roles, responsibilities, and management processes for both service and security Incidents, in line with ITIL[®]. It will also set out the target times for Incident resolution, in line with performance measures for target and minimum service levels included in the SEC (Section H). The DCC is required to produce a draft of the Incident Management policy, and is in the process of doing so.

Question 11 sought views on the proposed SEC drafting with respect to Incident Management.

Government Consideration of Issue

- 95 The majority of those that responded to this question supported the approach to Incident Management set out in the SEC. In general, with some minor additions, the proposed SEC drafting for the Incident Management is considered appropriate.
- 96 One respondent commented that, in addition to Incident records, Service Users should have access to problem records to enable them to monitor progress towards the solution of the underlying problem. We agree with this point, but as problem management is an area on which we have not previously consulted, the changes will be consulted on in a future stage of the SEC.
- 97 Some respondents were concerned that two days was insufficient time to prepare a Major Incident Report. We agree with this point. The SEC drafting will be amended to require a summary report within two days and a full analysis within four weeks.

Summary of Government Conclusion

All respondents were largely supportive of the Incident Management obligations set out in the consultation. With the addition of some minor clarifications, we consider the proposed SEC drafting is appropriate. Obligations for problem management will be consulted on as part of a future stage of the SEC.

Summary of Changes to Legal Drafting

SEC Section	Content
H: Incident Management	<ul style="list-style-type: none"> An obligation to update the Incident Management log has been added (section H9.1) The use of the Self Service Interface to resolve Issues has been included (section H9.2 and H9.5). Section H9.11 has been split into two sections to require the production of both a summary and a report following a Major Incident.

4.8 Self-Service Interface

Summary of Issue under Consideration

The Self-Service Interface (SSI) will allow DCC Users to search for information on DCC's Services, and to enter details of updates that facilitate their engagement with the DCC. The SSI should provide a first point of contact for DCC Users, and is designed to reduce the volume of queries raised directly with the DCC Service Desk.

Under its Licence, the DCC is required to prepare an SSI Design Specification (including the information to be provided via the SSI, and the mechanisms to ensure security of the interface), and a Code of Connection setting out how DCC Users can use the SSI (including any constraints on usage).

SEC2 legal drafting requires the DCC to make the SSI available in line with the Specification and Code of Connection, on a 24/7 basis, 365 days per annum. It also requires DCC Users to take all reasonable steps to resolve any queries and Incidents through the SSI, before contacting the DCC Service Desk.

Question 12 sought views on the proposed SEC drafting with respect to the Self-Service Interface.

Government Consideration of Issue

- 98 Over half of respondents to this question agreed with the proposed text for the SEC. The majority of issues raised by respondents relate to the design of the systems that implement the SEC obligations. As such we would encourage respondents to raise these issues in the appropriate design forum managed by the DCC. We have therefore concluded that our proposals and associated SEC legal drafting are appropriate.
- 99 We have noted the concern raised by one respondent in relation to access to the SSI only being available to DCC Users. We understand that the added complexity (and cost) of designing and managing access control for non-DCC Users to the SSI could outweigh the benefit of changing the proposed access rights.
- 100 Additionally, any non-DCC User will have access to information via the Service Desk. We believe this arrangement would accommodate the needs of these industry participants, for example an energy Supplier that is not a DCC User.
- 101 The DCC is currently developing its proposals for the Self Service Interface Specification and Code of Connection. As a result of those proposals, further changes may need to be made to Section H of the SEC. Should this be the case, we will consider the most appropriate process for amending Section H following the production of these draft subsidiary documents.

Summary of Government Conclusion

The majority of respondents supported our proposed SEC drafting. We have therefore concluded that our proposals and associated SEC drafting will remain unchanged, bar some minor clarifications to the text.

Summary of Changes to Legal Drafting

SEC Section	Content
H: Self-service Interface	<ul style="list-style-type: none"> Minor clarifications have been made to the text.

4.9 DCC Service Desk

Summary of Issue under Consideration

SEC2 legal drafting requires the DCC to provide a Service Desk, which can be accessed by all DCC Users and SEC Parties via telephone, email or the SSI, and is available a 24/7 basis, 365 days a year.

Question 13 sought views on the proposed SEC drafting with respect to the DCC Service Desk.

Government Consideration of Issue

102 All those who responded to this question agreed with the Service Desk approach set out in the SEC. The DCC requested that the SSI be included as a method of contact for the Service Desk. We agree and the proposed SEC drafting will be amended to reflect this.

Summary of Government Conclusion

All respondents were supportive of the DCC Service Desk obligations set out in the consultation. With the addition of some minor clarifications, the SEC drafting for the Service Desk is considered appropriate.

Summary of Changes to Legal Drafting

SEC Section	Content
H: Service Desk	<ul style="list-style-type: none"> H8.18 has been expanded to include access to the Service Desk via the Self-service Interface.

4.10 DCC Service Performance Reporting

Summary of Issue under Consideration

The DCC's Service Provider contracts include provisions for the DCC to monitor service performance. In addition, the DCC Licence places obligations on the DCC to monitor its own levels of service performance.

SEC2 legal drafting reflects these provisions, to ensure that overall service performance can be reported to DCC Users, and that performance standards are maintained. Five aggregate performance measures are set out for the DCC, together with a target, and a minimum, service level for each. The DCC must report these, and its Service Provider performance levels, on a monthly basis. Whilst the DCC can adjust the detailed performance measures of its Service Providers following consultation, it will only be able to change the aggregate performance measures against which it reports through the SEC modifications process.

Question 14 sought views on the proposed SEC drafting with respect to the proposed approach to DCC Service Performance Reporting.

Question 15 explored whether the proposed approach balanced the need for the DCC to manage its Service Providers flexibly, whilst allowing DCC Users a say regarding overall performance targets.

Government Consideration of Issue

- 103 The majority of respondents to Question 14 supported the approach to Service Level Performance set out in the SEC drafting and a range of detailed comments were provided.
- 104 There was confusion over whether the obligations on performance standards and reporting related to testing only, or to Performance Measures more generally. We would like to clarify that the obligations set out are intended to apply in the enduring regime, and not just to testing. We recognise that Question 14 could have been more clearly phrased to reflect this, and the reference to Service Levels for Testing has confused a small number of respondents.
- 105 The DCC (on behalf of the Service Providers) raised material concerns about public reporting of Service Provider Performance Measures, given that some indicators contain commercially sensitive information relevant to each Service Provider (which varies depending on the Service Provider's technical solution. As an alternative, it was proposed by DCC that reporting should be limited to SEC Parties only and potential new entrants under appropriate confidentiality arrangements.
- 106 It was also suggested that, in place of Service Provider Performance Measures, the list of Code Performance Measures in H13.1 ought to be expanded to include a longer list of indicators to provide DCC Users insight into the standard of service being provided. Other respondents proposed that the DCC ought to be given an obligation to obtain explicit SEC Panel approval prior to amending Service Provider Performance Measures.
- 107 We remain in favour of a transparent approach for performance reporting. However, we recognise that there may be genuine issues regarding confidentiality of commercially sensitive issues for certain indicators within the Service Provider Performance Measures. We consider that further work should be undertaken to finalise the appropriate performance reporting for inclusion in the SEC, taking into account respondents' support for a transparent reporting regime and issues of commercial sensitivity. An amended

Section H13 reflecting the final position reached on this issue, as well as the conclusions in this document, is expected to be introduced as part of the SEC3 consultation response later in 2014.

- 108 We have reached conclusions on other performance reporting issues forming part of the SEC2 consultation. We believe that the tiered obligations on the DCC to explain the reasons for missing a Target Service Level, and to provide commentary on steps proposed to be taken to achieve the Minimum Service Level over the next reporting period remains appropriate.
- 109 The majority of respondents to Question 15 supported the inclusion of aggregate service performance metrics reporting within the regime. Most respondents also agreed in principle that DCC Users ought to have a say regarding performance targets.
- 110 Several respondents rejected the inclusion of aggregate service performance metrics within the regime and stressed their preference for reporting of disaggregated performance i.e. by DCC Users. As noted above, the Government will continue to work to include appropriate performance reporting measures in the SEC.
- 111 However, it is noted that the current system design within the DCC Service Provider contracts is such that the DCC is not able to provide disaggregated performance reporting without significant additional expenditure in enhanced reporting systems. This is not considered to be cost effective.
- 112 Finally, we consider the current proposed method for providing compensation or service credits associated with service level performance is appropriate. However it is able to evolve if it appears, after a period of operation, that a Supplier or a region is disproportionately affected.

Summary of Government Conclusion

On Question 14: The majority of respondents supported the envisaged approach to service level performance within the SEC. We agree that further work needs to be undertaken to finalise an appropriate level of Code Performance Measure and Service Provider Performance Measure reporting. This and other related issues will be included in SEC3 Consultation response.

On Question 15: The majority of respondents were supportive of the drafting, allowing the DCC to manage its Service Providers flexibly, whilst allowing DCC Users a say regarding overall performance targets. As noted above, our response to this will be included in SEC3.

Summary of Changes to Legal Drafting

SEC Section	Content
H: Performance reporting	Changes to section H13 are still under consideration.

4.11 Managing Demand for DCC's Services

Summary of Issue under Consideration

The DCC's Service Providers are contracted to provide a finite monthly capability to process Service Requests. In the light of this, we have identified a specific subset of User Gateway Services where unfettered demand could breach the DCC's total monthly capability, related to the processing of frequent small messages (half hourly profile data) and high capacity messages (firmware upgrades). Monthly limits will be set out in the User Gateways Services Schedule for such Services, and the DCC will be required to report against these.

Question 16 sought views on the proposed SEC drafting with respect to the proposed approach to Managing Demand.

Government Consideration of Issue

- 113 The large majority of respondents to Question 16 supported the proposed approach, allowing the DCC to manage demand for services over time.
- 114 We would like to clarify that the obligations set out in Managing Demand for User Gateway Services (H3.38 to H3.43) will apply to cover the period of Initial Live Operations onwards. Some testing of Service Request demand may take place earlier.
- 115 The DCC indicated that it requires forecast data over a slightly longer period than six months to facilitate its own demand forecasting with the DCC Service Providers. In line with DCC's request, we will amend the SEC drafting to require DCC Users to provide eight month forecasts on a quarterly basis. This is considered to be a preferable to the DCC's alternative suggestion of requiring DCC Users to provide six month forecasts on a monthly basis. The months specified for providing these forecasts will also be amended to avoid a potential forecasting conflict noted by one respondent.
- 116 We agree that reporting of under-usage of forecast demand ought to take place. This will assist in encouraging DCC Users to be as accurate as possible in forecasting usage. Accordingly, we will amend SEC drafting to require the DCC to report to the SEC Panel and Parties where a DCC User's monthly usage for any Service Request is greater than or equal to 110%, or less than or equal to 90%, of their monthly forecast.
- 117 We recognise that providing accurate Service Requests forecasts will be particularly challenging in the initial roll-out phase. We do not agree, as some respondents suggested, that the threshold band on reporting on Parties exceeding their demand forecasting should be increased from 110% to 120%. However, we do propose to amend the SEC drafting to give the SEC Panel the discretion not to publish a report on DCC Users who are not within their forecast demand in certain circumstances. These circumstances would include if the over- or under-forecasting was due to reasonable forecasting errors (such as a small sample size during the period immediately following Initial Live Operations, inaccurate information being provided from suppliers to networks, or due to another reason beyond the DCC User's control).
- 118 Respondents queried whether there would be any charge for alerts. Section K7.5(b) allows for charging of Services which are identified as attracting an Explicit Charge in the User Gateway Services Schedule. The DCC has confirmed that it does not intend to charge for alerts at this stage as there are currently no incremental costs from the service providers related to processing each alert. Accordingly the current draft User Gateway Services Schedule, which will be published as part of SEC3, does not identify alerts as

attracting an Explicit Charge. When finalised, the User Gateway Services Schedule will be designated and form part of the SEC.

119 In response to other points raised by respondents:

- we agree that it will be important for the DCC to procure sufficient capacity and consider that this matter is addressed by conditions in the DCC's Licence; and
- we consider that 'entitlement' trading of allocated Service Requests would be overly complex to implement and is unnecessary. Entitlement trading would require a clear definition of each entitlement fully reflective of the nature of the system constraint and the DCC would need a trading platform to facilitate this. There would also need to be 'Use It or Lose It' or 'Use It or Sell It' provisions.

Summary of Government Conclusion

The large majority of respondents supported the proposed approach to Managing Demand. In line with the suggestion from one respondent, we will amend the SEC to require DCC Users to provide eight month forecasts on a quarterly basis. We will now be requiring the DCC to report on Parties under usage of their demand forecast (less than or equal to 90%) as well as over usage (equal to or greater than 110%). Based on comments received we will also

be giving the SEC Panel the discretion not to publish the report on DCC Users who are not within their forecast demand in certain circumstances.

Summary of Changes to Legal Drafting

SEC Section	Content
H: DCC's Services	<ul style="list-style-type: none"> • Amendment to the months specified for DCC Users to provide forecasts of Service Requests to the DCC and a further amendment which requires DCC Users to send in forecasts for 8 months instead 6 months (section H3.38) • Addition to require reporting where a User's forecast is less than or equal to 90% of the User's monthly forecast Service Requests. Amendments to drafting to allow the Panel the discretion to publish a report or a section of a report regarding a User's over- or under-forecasting of Service Requests, where it considers the incorrect forecasting was a reasonable forecasting error or due to a reason beyond the User's control (section H3.40)

5 Security Requirements

Summary of Issue under Consideration

Consumers are dependent on the secure operation of the Smart Metering processes and systems of both the DCC and DCC Users. Obligations will therefore be placed on the DCC and DCC Users to ensure the overall security of their systems, and the data held on them. The DCC will only be allowed to provide services to DCC Users who have completed the User Entry Processes, which amongst other things, will demonstrate compliance with their security obligations. The SEC will also place obligations on the DCC and DCC Users relating to general organisational security.

The DCC and all DCC Users will be required to establish a process for security risk identification and management. This obligation will extend to the RDPs, given the importance of registration data in Smart Meter operations. Obligations will also be placed on the DCC, DCC Users and the RDPs for information security management, although these will be proportionate to the role and capability of each SEC Party.

Question 17 sought views on the proposed SEC drafting for the security obligations. Question 18 asked about the appropriateness and proportionality of the security obligations in relation to the different types of DCC Users and their roles.

Government Consideration of Issue

- 120 The majority of the respondents to Question 17 were supportive of the proposed SEC drafting, although the respondents did clarify their general approval with of the following caveats:
- respondents suggested that DCC User system and information security obligations should not apply to DCC User back office and support systems; and
 - respondents also thought that energy supplier and network operator call centre and other support staff should not be subject to security screening in accordance with British Standard 7858.
- 121 To address respondents' concerns about the broad scope of DCC User system and information security obligations, these will now predominantly apply to those energy control systems that are used to communicate directly with the DCC. However to ensure that DCC Users give security consideration to their back office and support systems, the scope of their risk management processes (to be carried out in accordance with ISO 27005) will be extended to capture back office and support systems.
- 122 In response to respondents' views about the scope of BS 7858, the SEC will only require personnel screening of individuals with access privileges to energy control systems that directly communicate with the DCC that, if misused, could directly or indirectly cause an impact on the supply of energy within the home of a consumer.
- 123 Some respondents queried how their regulatory compliance would be affected when various standards were updated or replaced.
- 124 The SEC will provide for a grace period by the end of which all SEC Parties will be required to comply with an updated industry standard. A default grace period is usually

recommended by the relevant standards body but the Security Sub-Committee⁹ will have the ability to extend this period using its judgement which is likely to be influenced by reference to the criticality of the update and the degree of difficulty attached to its implementation.

- 125 Some respondents asked for clarity on what constitutes ‘compliance’ with security standards, in particular with ISO 27001. All standards, including ISO 27001, require the establishment, implementation and periodic reviews of the policies and procedures outlined in the standard. All SEC Parties are expected to follow the requirements of each standard to secure compliance in proportion to the scale of their DCC operations and their own risk assessment. SEC Parties are also expected to retain evidence of this such that it would support a subsequent assurance assessment if required.
- 126 A slim majority of respondents to Question 18 disagreed with the proposed SEC drafting. Those agreeing and disagreeing were split by sector and scale of organisation:
- large energy suppliers were broadly supportive of the security framework as presented;
 - domestic and non-domestic small (i.e. likely to have fewer meters enrolled with the DCC) energy suppliers argued that the cost of attaining compliance with the security standards specified in the SEC was relatively fixed in relation to the number of customers served by an energy supplier. As such, the cost would fall disproportionately on energy suppliers with very low numbers of enrolled meters; and
 - network operators asserted that the obligations proposed were too stringent, considering the relatively limited functionality which these DCC Users have access to.
- 127 In developing security obligations consideration has been given to the role, responsibilities and capabilities of a particular User, the type of controls that each User would implement and the support of market based solutions. For example, it is reasonably expected that, through complying with ISO 27001 and ISO 27005, larger energy suppliers will find it necessary to implement a more robust and thus more costly set of security controls, when compared with a smaller energy supplier with fewer enrolled meters; thus proportionality is inherent in complying with these standards.
- 128 Some small energy suppliers may also choose to take advantage of market based services in relation to the design, build and test of their systems, rather than operating these in-house. We anticipate that service providers will have the capability to contract with a number of customers, with the corresponding economies of scale being passed on to the energy supplier.
- 129 However in recognition of small energy suppliers’ concerns we plan to undertake further analysis to consider arrangements for energy suppliers with very low numbers of enrolled meters; for example, non-domestic energy suppliers who inherit single or low numbers of DCC enrolled meters, or energy suppliers who inherit enrolled meters before they might otherwise have begun their own roll-out. We will continue to consider whether any changes are required in a future consultation.

⁹ Security Sub-Committee’s role in keeping the security obligations under review and advising the SEC Panel on security governance matters was outlined in the Government response to the SMETS 2 consultation. Its detailed responsibilities will be subject to future consultation.

- 130 In response to the network operators' concerns, this group of DCC Users will not be subject to vulnerability assessment and personnel screening obligations at this point in time. However should network operators be provided with future capability to impact upon the supply of energy to a consumer, we anticipate that their security obligations under the SEC will be modified to align with those of energy suppliers.
- 131 Non-domestic energy suppliers also questioned why there was a need to specify adherence to security standards (e.g. ISO 27001 and ISO 27005) when they are not already required to do so under energy supply licence conditions.
- 132 We note that the existing supply licence obligations outline arrangements necessary during the period ahead of DCC providing services. Given the flexibility energy suppliers are afforded in determining how to securely communicate with their meters installed during this period, the licence condition is drafted at a necessarily high level to allow energy suppliers to apply appropriate security controls to their communications infrastructure as well as their own systems.
- 133 In the enduring phase the licence condition that will be placed on energy suppliers to govern the security of their systems¹⁰ will also be set at a high level. Because the SEC governs the detailed contractual arrangements between the DCC and DCC Users there is a need to be very specific in relation to the responsibilities of each SEC Party, including in relation to security, in case of a breach by a SEC Party and arising liabilities.

Summary of Government Conclusion

On Question 17: The majority of respondents supported our proposed SEC drafting for security obligations, although some requested some amendments. The SEC drafting will be amended in relation to the scope of DCC User system and information security obligations, staff screening and the timing of compliance with updated security standards to address the concerns.

On Question 18: Respondents were split on this issue, with large energy suppliers supportive and network operators and small energy suppliers less so. While network operators will be subject to less obligations, given their limited capability to impact the integrity of data held on Smart Metering devices, obligations placed on energy suppliers and other DCC Users are considered to be proportionate and adaptable to different levels of security risk. We will continue to consider whether any changes are required in relation to energy suppliers with a very small number of enrolled meters in a future consultation.

Summary of Changes to Legal Drafting

SEC Section	Content
G: Security	<ul style="list-style-type: none"> New provisions set out a process for securing compliance with updated or replacement security standards. They provide for a transitional period to be set by the Security Sub-Committee, by the end of which parties must comply with updated or replacement security standards (sections G1.2 to G1.4). Network operators are no longer subject to these provisions, which require vulnerability monitoring to be performed on DCC user systems (section G3.7 to G3.9). New provisions now require screening of the User personnel that have access to systems directly communicating with the DCC and that is capable of affecting the

¹⁰ The content of this licence condition is subject to future consultation.

quantity of gas or electricity to a premises. At this point in time only suppliers are subject to these provisions (section G4.2 to G4.4).

- The scope of these provisions, which relate to compliance with ISO 27005, is extended to include back office and support system in addition to systems directly communicating with the DCC (section G5.14 to G5.16).
- The scope of this provision, which relates to compliance with ISO 27001, is limited to systems directly communicating with the DCC (section G5.17).

6 Glossary

This section provides a glossary of the principal terms used in this document.

A complete set of definitions and interpretations of terms used in the SEC can be found in Section A of that document.

The definitions in this glossary are not intended to be legally precise, but instead to assist in understanding the consultation document.

Alert

A message from a Device or from DCC and sent to a DCC User across the User Gateway.

Command

A message sent by DCC to a Device over the SMWAN (or to a DCC User over the User Gateway to be executed locally) in order to instruct the Device to carry out an action.

Commissioned

A Device status recorded in the Smart Metering Inventory. The steps a Device must go through to be Commissioned vary by Device type, but essentially this status is achieved when: the Device has been added to the Smart Metering Inventory; it has been demonstrated that DCC can communicate with it (and vice versa) over the SMWAN; and its relationship with either the Communications Hub Function or a Smart Meter has been established.

Communications Hub

A device which complies with the requirements of CHTS and which contains two, logically separate Devices; the Communications Hub Function and the Gas Proxy Function.

Communications Hub Function

A Device forming part of each Smart Metering System which sends and receives communications to and from the DCC over the SMWAN, and to and from Devices over the HAN.

Communications Hub Technical Specifications (CHTS)

A document (which is to form part of the SEC) which sets out the minimum physical, functional, interface and data requirements that will apply to a Communications Hub.

Communications Service Provider (CSP)

Bodies awarded a contract to be a Service Provider of communications services to DCC as part of DCC's Relevant Services Capability. Arqiva Limited and Telefónica UK Limited have been appointed to provide these services.

Core Communication Services

The services associated with processing a specific set of Service Requests set out in the DCC User Gateway Services Schedule in a manner that involves communication via the SMWAN, but excluding the Enrolment Services.

Correlate

A check, to be carried out by DCC Users, to ensure that the Pre-Command created by DCC after transforming a Critical Service Request is substantively identical to the original Service Request.

CoS Party

A separate part of the DCC, responsible for signing critical Commands to update a Supplier's Security Credentials on a Device following the submission of a 'CoS Update Security Credentials' Service Request by an incoming Supplier to the DCC.

Data and Communications Company (DCC)

The holder of the Smart Meter communication licence, Smart DCC Ltd.

Data Service Provider (DSP)

The company awarded a contract to be a Service Provider of data services to DCC as part of DCC's Relevant Services Capability. CGI IT UK Limited has been appointed to provide these services.

DCC Licence

The licence awarded under section 7AB of the Gas Act 1986, and the licence awarded under section 5 of the Electricity Act, each allowing Smart DCC Ltd to undertake the activity of providing a Smart Meter communication service.

DCC Service Providers

Companies or persons from whom DCC procures Relevant Services Capability; principally the DSP and the CSPs.

DCC Systems

The systems used by the DCC and its DCC Service Providers in relation to the Services and / or the SEC, including the SMWAN but excluding the Communications Hub Functions.

DCC Total System

All DCC Systems and Communications Hub Functions.

DCC User

A SEC Party who has completed the User Entry Processes and is therefore able to use DCC's Services in a particular User Role.

DCC User Gateway

The communications interface designed to allow appropriate Smart Metering communications to be sent between DCC Users and the DCC.

Device

One of the following: (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Interface; (f) an Auxiliary Load Control; or (g) any Type 2 Device (e.g. IHD).

Distribution network operators (DNOs)

Holders of electricity Distribution Licences.

Elective Communications Services

The services associated with processing of Service Requests that are (or are to be) defined in a Bilateral Agreement (rather than the DCC User Gateway Services Schedule) in a manner that involves communication via the SMWAN (provided that such Service Requests must relate solely to the Supply of Energy or its use).

Electricity Smart Meter

A Device meeting the requirements placed on Electricity Smart Metering Equipment in the SMETS.

Eligible User

A DCC User who, acting in a particular User Role, is eligible to receive particular DCC's Services, including in relation to a particular Device.

End-to-End Smart Metering System

Any DCC System, Smart Metering System, User System or RDP System.

Enrolled

The status of a Smart Metering System when the Devices which form part of it have all been Commissioned.

Enrolment Services

Services associated with the processing of Service Requests that are involved in the commissioning of Devices in the Smart Metering Inventory, and establishing their inter-relationships, and which ultimately result in the Enrolment of Smart Metering Systems ready for communication via DCC over the SMWAN.

Foundation stage

The period prior to the start of the Mass roll-out stage.

Gas Proxy Device

A Device which stores and communicates gas-related metering information, required in order to reduce the necessary battery life of Gas Meters, and which forms part of the Communications Hub. The Gas Proxy Device is treated as a separate logical Device for the purposes of Smart Meter communications.

Gas Smart Meter

A Device meeting the requirements placed on Gas Smart Metering Equipment in the SMETS.

GB Companion Specification (GBCS)

A document setting out amongst other things, the detailed arrangements for communications between the DCC and Devices and the behaviour required of Devices in processing such communications.

Hand Held Terminal (HHT)

A HAN-connected Device used by authorised personnel for meter installation and maintenance purposes.

Home Area Network (HAN)

The means by which communication between Devices forming part of Smart Metering System takes place within a premises and which is created by the Communications Hub Function.

Initial Live Operations

The expectation that the DCC will have built and tested its systems for SMETS2 equipment and be operationally ready; all of the Large suppliers will be ready to use the DCC's Services, start installing SMETS2 meters and offer basic services to both credit and pre-payment customers; the DNOs will be ready to support Smart Meter installation; and the Electricity DNOs ready to

use the DCC Service to improve network management. Currently, this is planned to be September 2015.

In-Home Display (IHD)

An electronic Device, linked to Smart Meter, which provides information on a consumer's energy consumption and ambient feedback.

Mass roll-out stage

The period between the date at which the DCC starts providing Core Communications Services and the fulfilment of the roll-out obligation as specified in the roll-out licence conditions.

MPAN

The Meter Point Administration Number, being a unique reference number for each metering point on the electricity distribution network and allocated under the Master Registration Agreement.

MPRN

The Meter Point Reference Number, being a unique reference number for each metering point on the gas distribution network and allocated under the Uniform Network Codes.

MPxN

A collective reference to the MPAN and MPRN.

Network operators

A collective term for holders of electricity distribution licences and gas transportation licences.

Outage detection

The ability for an electricity supply interruption to be identified and communicated to the SMWAN.

Parse

The conversion of Service Responses and Alerts received from DCC over the User Gateway into a more user-friendly format.

Parse and Correlate Software

Software to be provided by the DCC which enables users to carry out the Parse and Correlate activities.

Pre-Command

A message generated as part of the processes of converting of Service Requests into Commands, i.e. after Transformation by DCC. For Critical Service Requests Pre-Commands are returned to the DCC User for correlation and signing after DCC has transformed the Service Request.

RDP System

The systems used by, or on behalf of a network operator for the collection storage, back-up, processing, or communication of Registration Data prior to being sent to DCC.

Registration Data Provider (RDP)

A person nominated by a network operator to provide Registration Data to DCC under the SEC.

Release Management

The process adopted for planning, scheduling and controlling the build, test and deployment of releases of IT updates procedures and processes.

Relevant Services Capability

The internal and external resources which the DCC relies upon in order to provide services to DCC Users.

Smart Meter

A Gas Smart Meter or an Electricity Smart Meter.

SECAS

The company appointed and contracted to SECCo to carry out the functions of the Code administrator and the Code Secretariat - Gemserv.

SECCo

A company established under the SEC, owned by SEC Parties and which acts as a contracting body for the SEC Panel.

SEC Subsidiary Documents

Documents that are referenced by and forming part of the SEC, and thus subject to the SEC Modifications Process

Service Request

A communication to the DCC over the User Gateway (and in a form set out in the User Gateway Interface Specification) that requests one of the Services identified in the User Gateway Services Schedule (or, in future an Elective Communications Service).

Service Response

A message sent from DCC to a DCC User over the User Gateway (and in a form set out in the User Gateway Interfaced Specification) in response to a Service Request.

Smart Energy Code (SEC)

The Code designated by the Secretary of State pursuant to Condition 22 of the DCC licence and setting out, amongst other things, the contractual arrangements by which DCC provides services to DCC Users as part of its Authorised Business.

Smart Metering Inventory

An inventory of Devices which comprise Smart Metering Systems which are (or are to be) Enrolled with DCC. The Smart Metering Inventory also holds information about Devices and their inter-relationships.

Smart Metering Equipment Technical Specifications (SMETS)

A specification (which is to form part of the SEC) of the minimum technical requirements of Smart Metering equipment (other than Communications Hubs which are separately dealt with in CHTS).

Smart Metering System (SMS)

A particular collection of Commissioned Devices installed in a premises:

- a Gas SMS comprises a Communications Hub Function, a Gas Smart Meter, a Gas Proxy Device and any additional Type 1 Devices; and
- an Electricity SMS comprises a Communications Hub Function, an Electricity Smart Meter and any additional Type 1 Devices.

Smart Metering Wide Area Network (SMWAN)

The network that is used for two way communication between Communications Hub Functions and the DCC.

Solution Architecture

The overall Technical Architecture of the DCC's Solution (including its Service Providers), comprising a description of the individual components of the Solution (including all Systems, Hardware and Software) and interfaces with the Systems of other DCC Eco-System Entities

Supplier

The holder of a gas supply licence or an electricity supply licence.

Technical Architecture

The DCC Systems and the Smart Metering Systems together, including as documented in the Technical Specifications.

Transformation

The conversion, by DCC, of a Service Request into the format required in order for the Command to be executed by a Device.

User Role

One of a number of different capacities in which a DCC Party may (if appropriately authorised and having gone through the necessary User Entry Processes) act, including: Import Supplier; Export Supplier; Gas Supplier, Electricity Distributor, Gas Transporter or Other User.

User System

Any Systems (excluding any Devices) which are operated by or on behalf of a User and used in whole or in part for:

- constructing Service Requests;
- sending Service Requests over the DCC User Gateway;
- receiving, sending, storing, using or otherwise carrying out any processing in respect of any Pre-Command or Signed Pre-Command;
- receiving Service Responses or alerts over the DCC User Gateway; and
- generating or receiving Data communicated by means of the Self-Service Interface.

Annex 1: Responses received

SEC Panel	ICOSS
MRA Executive Committee	Good Energy
DCC	Haven Power
Xoserve	Opus Energy
TMA Data Management Limited	Wingas
Energy Networks Association (ENA)	Ofgem
UK Power Networks	
SP Energy Networks	
Electricity North West	
Northern Power Grid	
ESP Utilities	
SGN (joint with SSE)	
Energy UK	
British Gas	
EDF	
EON	
Npower	
Scottish Power	
SSE (joint with SGN)	

Annex 2: Summary of responses to Consultation Questions

Technical Governance and Change Control

Q1 Do you agree with our proposed text for the SEC with respect to Technical Governance and Change Control? Please provide a rationale for your views.

A majority of respondents to this question confirmed their support for the creation of the TSC and agreed broadly with the proposed legal drafting, with little variation between industry sectors.

The most frequently raised area of concern was how the composition of the TSC would be determined. Points included:

- whether the SEC Panel would be capable of identifying the right balance of membership, in terms of industry representation and relevant expertise;
- whether assurance would be given that the membership would be representative and suitably qualified; and
- the need for TSC to have impartiality.

The TSC will establish a process for the SECAS to monitor modification proposals in order to ensure that the TSC is made aware of any modification proposals that are likely to affect the end-to-end Technical Architecture. Concern was expressed at the ability of SECAS to determine which modifications could have an impact on technical specifications. It was suggested that the TSC should be involved in considering all change proposals. Although one respondent recognised that in practice they will have to rely on SECAS to decide which modifications should be resolved by TSC.

A respondent suggested that the role of the TSC in the SEC modification process could be strengthened by requiring that any advice or recommendations from the TSC should be formally noted and reported upon as part of this process, due to the importance of the TSC's views being taken into account in decisions on relevant modification proposals.

Respondents also requested that the relationship between the TSC and Working Groups to be better defined. The need for the TSC to be adequately resourced in order for it to fulfil its duties was highlighted, although it was also noted that it was important for its costs to be monitored. It was pointed out by one respondent that an obligation had not been included in the SEC drafting for the creation of the TAD which the TSC will be required to maintain.

Registration Data

Q2 Do you agree with our proposed text for the SEC with respect to Registration Data? Please provide a rationale for your views.

The majority of respondents to this question agreed that the proposed text for the SEC with respect to Registration Data was appropriate. Although many still provided suggestions as to how the SEC drafting could be refined.

There was support for the DCC being responsible for the design and development of the Registration Data Interface, in cooperation with Registration Data Providers. The importance of having access to accurate Registration Data was generally

	<p>emphasised. Several respondents noted with approval, that meetings to agree the detail of the Registration Interface were already taking place.</p> <p>The key theme to emerge from those respondents proposing alterations was the need to ensure SEC legal drafting is consistent with or takes into account other relevant codes. The potential for misalignment of data items between codes was strongly emphasised. One energy network highlighted a number of issues concerning in specific clauses in another code and offering detailed amendments to seek to address these issues.</p> <p>Code administrators acknowledged that there needed to be a clearly defined disputes process involving the SEC Panel and noted that other relevant codes contain provisions relating to disputes, duties and rights relating to registration data. Accordingly, it was suggested that disputes may need to be resolved through cross-code liaison or joint code working in order to achieve an efficient resolution. One large energy Supplier also noted that the SEC Panel's determination of disputes would need to take into account by other codes.</p>
<p>Q3</p>	<p>The DCC currently uses profile class data as a proxy to estimate the number of non-domestic meter points registered to users. Should this be replaced with a new data item which accurately reflects non-domestic meter registration, or should the DCC continue to use profile calls as a proxy? If you think it should be replaced, should the DCC rely on suppliers providing this information separately, or should a change be sought to electricity registration systems to collect this data? Please provide a rationale for your views.</p> <p>The majority of respondents to this question supported the uses profile class data as a proxy to estimate the number of non-domestic meter points registered to users. All large energy suppliers, the distribution network operators and one small energy Supplier supported the continued use of profile class (with one noting the limitation of profile class as a proxy) for the time being. They made the following points:</p> <ul style="list-style-type: none"> • the introduction of a new data item would incur considerable additional costs for system changes which would yield very little or no benefit to industry; • any change would be unlikely to deliver material variations to charges especially while there were no meters enrolled with the DCC; • proposed changes to the way the registration is managed would mean new changes to data items, which may only last a short time, resulting in unnecessary costs; • there are benefits in considering the bigger picture regarding approach to registration data management, noting these proposed changes to registration data management, with the option of delivering a market sector indicator at that time; and • it's possible for suppliers to amend profile class of meter points to be more reflective of its market sector. <p>The DCC supported the switch, as did one code administrator's executive committee and two small energy suppliers. Several of these respondents also highlighted the time it would take to implement. Those who supported the inclusion of a new data item noted that the use of profile class as a proxy is an over-simplification which</p>

	would lead to considerable error.
Q4	<p>The SEC will include a requirement for RDPs to provide the DCC with a ‘data refresh’ on request, within a set number of days. Do you agree that it is sensible to measure in calendar days? If so, what is the impact of providing data refreshes to the DCC within two calendar days? If this has too significant an impact, what should the correct value be? Alternatively, do you believe it should be a set number of working days? If so, how long should this period be?</p> <p>The majority of respondents disagreed with the proposed timings by which RDPs should provide full refreshes to the DCC. Alternative preferences varied from one calendar day through to 15 days.</p> <p>The DCC supported the provision of data refreshes on a calendar day basis, noting that its services would be provided on a 24/7/365 basis. It highlighted the potential risks to its service delivery should the registration data it held become misaligned, as it would do if the refresh period were longer than one calendar day. It noted that, should an Incident where DCC require a full registration data refresh be categorised as a priority one Incident, it would have a target resolution time of four hours. This target could not be met if a full registration data refresh took days to be provided.</p> <p>One large energy Supplier supported the view that data should be provided within a two calendar day timescale, with another large Supplier noting that this was not unreasonable. The MRA Executive committee also noted that a two calendar day period, if included in the SEC, would not be commensurate with the rules in the MRA, and that a consequential change to the MRA would be required.</p> <p>A potential gas registration provider accepted the importance of a calendar day arrangement, given the DCC’s operation on every day of the week. However, they suggested a five calendar day period for RDPs to provide a full data refresh to the DCC, to be kept under review in light of evolving capabilities of parties’ systems. Five large energy suppliers also supported a five day, working or calendar, refresh period.</p> <p>All distribution networks expressed a preference for a working day approach: one suggesting a three working day period, and all others referring to a clause in the MRA which sets out that a full refresh of MPAN data should be provided within 15 working days from a request being made. Several distribution networks noted that the MRA provided for selective (i.e. not full) data refreshes to be provided overnight if requested before 3pm. One Distribution Network noted that providing a full data refresh to other parties would be impossible within two calendar days, given that the process for providing a full refresh in its systems takes 56 hours to run.</p>
DCC User Gateway	
Q5	<p>Do you agree with our proposed text for the SEC with respect to the DCC User Gateway? Please provide a rationale for your views.</p> <p>The majority of respondents to this question were in agreement with the SEC legal drafting as set out in the consultation. This included support from the majority of energy Suppliers and network operators. However, it was noted that on-going alignment would be needed to maintain the DCC User Gateway Services Schedule as the development of key technical documents including the CHTS, SMETS and GBCS continued.</p>

Questions were raised about the charging arrangements for connecting to the DCC User Gateway.

DCC User Gateway Services and Service Request Processing

Q6 Do you agree with our proposed text for the SEC with respect to the DCC User Gateway Services and Service Request Processing? Please provide a rationale for your views.

Respondents to this question were generally supportive of the proposed SEC legal drafting. One respondent supported the proposal, however with a few caveats, and the remainder were neutral in their support. The neutral respondents raised the issue relating to the 'Restrict Access for Change of Tenancy' Service Request (H3.24). They thought that this activity was applicable to network operators which is not the case.

One respondent indicated that the text referring to the obligations of the DCC: Processing Service Requests (H4.9) could have implications for the design of the system. It was also asked whether sufficient safeguards were in place to prevent access to the information available within the DCC's Inventory.

Parsing and Correlation

Q7 Do you agree with our proposed text for the SEC with respect to Parsing and Correlation? Please provide a rationale for your views.

The majority of respondents to this question were largely supportive of the Parse and Correlate obligations as stated in the SEC. Although most had specific drafting issues or clarifications to be addressed. There were a handful of consistent themes, none of which were specific to a category of respondent.

A key issue raised by a number of respondents, related to the need to ensure that the Parse and Correlate Software continues to align with any subsequent versions of the DCC's User Gateway Interfaces. This is in order to ensure continued interoperability. Points included:

- DCC expressed concerns about supporting a large number of software versions, while Service Users wished to avoid regular upgrading or upgrading at short notice;
- several respondents requested a mandatory notice of the release schedule, so that Service Users could effectively plan and manage upgrades to their IT estates; and
- it was also pointed out that the release mechanism must accommodate emergency changes to the software.

Security related concerns were raised by two respondents. Firstly as to whether providing the software to 'any persons' introduced an unnecessary risk, and secondly to oblige the DCC to resolve any identified software vulnerability.

A range of other issues were also raised. These included:

- a request for clarification on the level of independent assurance that the Parse and Correlate Software will be subject to as part of the DCC's testing;

- clarity was sought on the charging mechanisms and how these would be applied fairly, including any subsequent costs following the initial procurement. Confirmation of any charges associated with ZigBee or DLMS use was also requested; and
- One responder questioned the removal of Escrow arrangements, which would have been for the safekeeping of Parse and Correlate source code. There was concern as to how this may affect business continuity.

Enrolment in The Smart Metering Inventory

Q8 Do you agree with our proposed text for the SEC with respect to Enrolment in the Smart Metering Inventory and other associated processes? Please provide a rationale for your views.

The majority of respondents to this question agreed with the SEC2 legal drafting for enrolment. Where respondents had caveats it was often to request greater clarity in the drafting. Some respondents identified that the detailed solution design is being developed concurrently and that SEC drafting may need amendment in future to align with the solution. This included a specific question around the policy on 'install and leave'

Intimate Communications Hub Interface

Q9 Do you agree with our proposed text for the SEC with respect to the Communications Hub: Intimate Physical Interface? Please provide a rationale for your views.

The majority of respondents to this question agreed with the proposed ICHIS text in the SEC, with only one respondent stating they disagreed with the drafting.

A number of respondents noted that the SEC legal drafting and the underlying approach would ensure that the ICHIS is kept under review and that stakeholders are consulted before any changes are made. Other suggestions included:

- that the ICHIS should be included in the SEC;
- that an annual review of the ICHIS should be mandated and a Right of Appeal to Ofgem on ICHIS changes that have a material impact on parties should be made available; and
- that provisions were made to ensure the DCC provides reasonable notice before confirming the introduction of a new version of the ICHIS (for example, to allow supply chain management).

Two respondents proposed that it was not necessary for the ICHIS to define an interface between the Communications Hub and a Smart Gas Meter. These respondents also suggested that the requirement that that ICHIS 'define the data interface' should be amended to 'define the physical data connectors' as it is not intended that the ICHIS defines the communications standards used in Smart Metering Systems.

Other issues raised around ICHIS included:

- two respondents felt that the ICHIS should not be made freely available as they

believe this could present a security risk;

- one respondent thought that the ICHIS should allow for the replacement of the Communications Hub without the need to disconnect the electricity supply to the premises; and
- two respondents suggested that the SEC should define operational arrangements for the hot-shoe, especially at CoS.

DCC Service Management

Q10 Do you agree with our proposed text for the SEC with respect to DCC Service Management? Please provide a rationale for your views.

Those that responded to this question agreed with the approach to Service Management set out in the SEC, with some expressing explicit support for the alignment with ITIL. One respondent suggested that the SEC should be extended to include all of the ITIL processes. Most respondents included caveats in their responses. Comments were clustered around Planned Maintenance and Change Management. On Planned Maintenance respondents said:

- periods of severe weather needed to be taken into account, when DCC Systems would be needed to support restoration of service;
- allowable downtime and scheduling periods should vary depending on the components (e.g. network masts cannot be maintained in the dark for health and safety reasons); and,
- DCC Users impacted should be compensated in the case of over running maintenance.

On Change Management it was suggested:

- that all DCC impact assessments should go to the TSC;
- that Internal change to be impact assessed by DCC Users;
- that the SEC Panel and DCC Release Management policies should be merged to ensure consistency; and,
- that only 'urgent' changes should be allowed during the Transition period.

Incident Management

Q11 Do you agree with our proposed text for the SEC with respect to Incident Management? Please provide a rationale for your views.

The majority of those that responded to this question supported the approach to Incident Management set out in the SEC with others expressing no opinion. Two respondents were pleased that the approach is based on ITIL.

One energy Supplier stated that they would not be in a position to diagnose Communications Hub faults and that the DCC should take responsibility. Further, the Supplier should be compensated financially for replacing Communications Hubs. Whilst accepting that the electricity Supplier should take the lead in replacing Communications Hub, another Supplier suggested that the costs should be shared by

gas suppliers.

Other points included:

- one respondent was keen that DCC Users should use diagnostic tools and support materials before raising an Incident;
- an energy Supplier thought that Incident Categories should take into account the type of consumer impacted, not just numbers. They cited the example of pre-payment customers where a relatively small number of failures could have a big impact; and,
- two energy suppliers stated that 2 days was insufficient time to prepare a Major Incident Report.

Self-Service Interface

Q12 Do you agree with our proposed text for the SEC with respect to the Self-Service Interface? Please provide a rationale for your views.

Over half of respondents to this question agreed with the proposed text for the SEC. Generally, respondents felt the arrangements provided the appropriate framework for dealing with the general queries that will support the on-going relationship between the DCC and DCC Users.

About one third of respondents provided qualified support for the SSI arrangements, subject to a few additional requirements. One view promoted by energy Suppliers, was that the interface should be a machine to machine arrangement to facilitate bulk queries. However, the network operators generally had the opposing view i.e. to prevent over burdening, the SSI access should be a on a person to machine basis.

A small energy Supplier commented that if only DCC Users were able to access the SSI, this could cause issues for the wider Smart Meter market. For example, if a customer of an opted-in Supplier is transferred to an opted-out Supplier, the opted out Supplier would have a legitimate interest in the SSI.

DCC Service Desk

Q13 Do you agree with our proposed text for the SEC with respect to the DCC Service Desk? Please provide a rationale for your views.

All those who responded to this question agreed with the Service Desk approach set out in the SEC. Some respondents explicitly supported the need for 24/7 access to the Service Desk. One large Supplier suggested that costs could be reduced by tailoring availability to the volume and priority of DCC User interactions. Clarification was requested on the alternate access arrangements.

One respondent felt that the access channels list (telephone, email or the SSI should explicitly include the Self Service Interface. The channels should be set out in priority order to encourage use of the SSI.

It was noted that the detail of interaction between DCC Users and Service Desk will be influenced by the service design and process development. Further details about what enquiries can be made by SEC Parties who are not DCC Users and what restrictions will be put on their access were also requested.

Service Level Agreements for Testing

Q14 Do you agree with our proposed text for the SEC with respect to the Service Level Agreements for Testing? Please provide a rationale for your views.

The large majority of respondents to this question supported the envisaged approach to service level agreements within the SEC. One respondent disagreed with the proposed approach. However this disagreement appears to have mainly resulted from a misunderstanding over performance standards and reporting obligations (section H13) related to testing only, or to Code Performance Measures more generally.

Points that were raised in relation to the drafted text included:

- the Minimum Service level of 85% for Category 1 Incidents within the DCC performance measures was too low, proposing a figure of 95% instead;
- the Minimum Service Level for Category 2 Incidents also ought to be 95%; and,
- the DCC Service Provider performance information should be considered as commercially sensitive information and thus not published by the DCC.

It was pointed out that failure to meet Target Service Levels could impede testing progress. It was suggested that the DCC ought to be required to provide commentary on what they expect to do in order to achieve the Target Service Level over the next reporting period.

Two energy networks and one large Supplier suggested that the approach whereby the DCC consults on changes to the DCC Service Provider performance metrics is insufficient. Rather they thought the DCC should be required to either obtain explicit SEC Panel approval prior to amending the DCC Service Provider performance metrics in the SEC, or to submit proposed changes to the SEC Panel for review.

A few respondents found the reference to testing in the title box preceding questions 14 and 15 confusing ('Service Level Agreements for Testing') and also in the text of Question 14. The service level performance related provisions are required to support system testing by DCC and the DCC Service Providers, so this working title reflected this. However, it should have been updated to 'DCC Service Level Performance' on publication. Notwithstanding this, the majority of respondents appeared to understand the consultation question was intended to relate to monitoring and reporting on DCC Service Level Performance in the enduring regime and comments were framed accordingly.

Q15 Does the inclusion of DCC aggregate performance measures in the SEC, and the consequential reduction in future service charges, appropriately balance the need for the DCC to manage its Service Providers flexibly with the need for DCC Service Users to have a say regarding performance targets? Please give reasons for your answer.

The majority of respondents to this question supported the inclusion of aggregate service performance metrics within the regime. However, several respondents rejected this approach and stressed their preference for reporting of disaggregated performance i.e. by DCC Users. Most respondents agreed in principle that DCC

Users ought to have a say regarding performance targets.

Those supporting the approach generally emphasised the requirement for careful monitoring during roll-out. It was also noted that performance metrics may need to change once systems are operational.

Those rejecting the proposed approach noted that aggregated service performance metrics may mask issues relating to one particular region (perhaps with weaker WAN coverage) or poor performance by a DCC Service Provider. It was pointed out that this could prevent stakeholders from identifying individual DCC Service Provider issues early.

On the consequential reduction in future service charges, one respondent was not convinced of the new position outlined in the consultation.

Managing Demand

Q16 Do you agree with our proposed text for the SEC with respect to Managing Demand? Please provide a rationale for your views.

The vast majority of respondents to this question supported the envisaged approach, allowing the DCC to manage demand for services over time. Of the respondents in favour of the proposed text, it was noted that forecasting demand, particularly in the initial roll-out stage and at certain times of year, will be difficult. Other points raised included:

- the ability for DCC Users to forecast the demand for Alert services as these are outside their direct control;
- the scope for explicit charges for Alerts;
- the importance for the DCC to procure sufficient capacity to meet demand;
- amending the SEC so it requires the DCC to explicitly link any failure to achieve Target Response Times with the exceedance of forecasted Service Requests and providing further reporting on breaches; and,
- that the 110% threshold band for reporting on exceedance of monthly forecast Service Requests should be widened to 120% and reviewed annually.

The DCC indicated that it requires forecast data over a slightly longer period than 6 months, to facilitate its own demand forecasting with the DCC Service Providers. It proposed an 8 month period, or suggested alternatively that 6 month forecasts are provided monthly instead of quarterly.

Two respondents disagreed with the proposed approach. One respondent rejected the suggestion that there should be financial rewards for accurate demand forecasts. Another respondent raised a series of objections, highlighting difficulties they envisage in forecasting. This respondent also suggested that there should be the scope for DCC Users with spare capacity (under usage) to trade with others who needed more capacity.

Security Requirements

Q17 Do you have any comments on the security obligations set out in Section G of the SEC drafting or the way they are expressed?

The majority of respondents to this question were in favour of the security obligations set out in Section G of the SEC drafting. However, most of them also offered their support with caveats.

The majority of respondents' key area of concern was around the definition of 'User System'. They suggested that the current drafting was too broad.

The applicability of the requirement for DCC User personnel to undergo personnel vetting in accordance with British Standard 7858 was also called into question. Although there was support for the intent of the obligation, many felt that its scope, as currently drafted, was too broad.

Clarification was also sought on when parties would be required to be compliant with security standards. It was felt the current drafting could be interpreted as suggesting that updates to standards would render parties potentially non-compliant overnight.

Q18 Do you have any comments on the appropriateness and / or the proportionality of the security obligations in relation to particular types of DCC Service Users and their role?

The majority of respondents disagreed with the proposals laid out in the consultation. Those who supported and did not support the proposal were split by organisations type and size. Large energy suppliers were generally supportive of the current position, whilst small energy suppliers and network operators were either not supportive or of the view that an alternative approach would be more suitable.

Respondents supporting the current position noted that the division of security requirements had been subject to considerable discussion with stakeholders already. They posited that it was appropriate that all energy suppliers should be treated equally, regardless of the size of the organisations.

network operators were generally disapproving of the current position. They asserted that the requirements imposed were too stringent in comparison to the relatively limited functionality which these DCC Users have access to.

Small energy suppliers voiced their concern over the cost implications of the security requirements on smaller organisations. They also questioned why there was a need to specify adherence to new, additional security standards not already referenced in supply licence conditions. In particular standards for personnel vetting. Some of these respondents argued that the cost of attaining compliance with such standards was relatively fixed in relation to the number of customers served by a Supplier, and as such the cost of such measures would fall disproportionately on small energy suppliers.

Question 19 of the SEC2 Consultation consulted on four additional provisions intended to provide reliable and economic third party financing options for Communications Hubs. We published our conclusions on these provisions on 16 December 2013.

Questions 20 and 21 of the SEC2 Consultation invited views on proposals in relation to Communications Hub asset charges, maintenance charges, and charges following removal of a Communications Hub. We will publish our conclusions on these proposals when we consult on the legal text for charging and provision of Communications Hubs later this year so that the read across to related policies and legal drafting can be more clearly set out and understood.

Annex 3: User Gateway Services Schedule

Interpretation

The following interpretation applies to this draft User Gateway Services Schedule:

- when a User sends in a Service Request for any of the Services listed in the Schedule, H4 of the SEC describes the steps that the DCC must follow, including the provision of a Service Response to the Service User;
- the 'specified Device' or 'specified meter' is identified by specifying a Device ID in the Service Request;
- 'meter' means the Gas Smart Meter or Electricity Smart Meter as applicable;
- where not defined in Section A of the SEC, capitalised terms are defined either in SMETS, CHTS or the GBCS;
- where the table below includes 'N/A' this indicates that the category of Service is not available; and
- where a time value (e.g. 24hrs, 30secs) is included in the table below, this represents the 'Target Response Time' for the relevant activity associated with the processing of the Service Request or Service Response as set out in H3.20 of the SEC.

Further Development of the UGIS

This draft Schedule will need to be updated to align with the further development of the GB Companion Specification and the User Gateway Interface Specification. A further draft will be published along with the Government response document on the SEC3 consultation.

Currently certain Services are identified as available in relation to a number of Users Roles, however once the UGIS has been developed it is expected that some Services will need to be redefined into variants of the Service that are available to an individual User Role. For example, Service 6.2 'Read Device Configuration' is currently available to multiple User Roles but is likely to be further amended so that some elements of the Device Configuration can only be read by the Electricity Import Supplier or Gas Import Supplier, as the case may be.

The SEC3 consultation document discussed the treatment of MOPs and MAMs under the SEC. This version of the Schedule includes services that would be available to a new category of User Role, Supplier Nominated Agent, if the third option outlined in the SEC3 consultation paper is adopted (i.e. if MOPs and MAMs become SEC parties and take services in this new User Role).

All Services listed in this Schedule will attract an Explicit Charge pursuant to K7.5 (b). Device Alerts and DCC Alerts will not attract an Explicit Charge.

The list of Services now follows and this is in two parts:

- Table 5.1: those Services that result in a Command being sent to a Device ('Device Services'); and
- Table 5.2: those Services that require the DCC to undertake an activity ('Non-Device Services').

Table 5.3 provides the Monthly Service Metrics and associated Monthly Service Thresholds in relation to certain Service Request Types.

Role Reference Key							
<i>Role Reference</i>	EIS	EES	GIS	SNA	ENO	GNO	OU
<i>Description</i>	Electricity Import Supplier	Electricity Export Supplier	Gas Import Supplier	Supplier Nominated Agent	Electricity Network Operator	Gas Network Operator	Other User

Table 5.1: Service Requests that send commands to Devices

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
1.1	Update Import Tariff	Update the import tariff on a specified meter.	24hrs	30secs	EIS GIS
1.2	Update Price	Update the import price on a specified meter.	24hrs	N/A	EIS GIS
1.5	Adjust Meter Balance	Adjust the meter balance on a specified meter.	24hrs	30secs	EIS GIS
1.6	Update Payment Mode	Update the payment mode on a specified meter.	24hrs	30secs	EIS GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
1.7	Reset Tariff Block Counter Matrix	Reset the Tariff Block Counter Matrix on a specified meter.	24hrs	30secs	EIS
2.1	Update Prepay configuration	Update the prepayment configuration on a specified meter.	24hrs	30secs	EIS GIS
2.2	Top Up Device	Add prepayment credit to a specified meter.	N/A	30secs	EIS GIS
2.3	Update debt	Update debt values on a specified meter.	N/A	30secs	EIS GIS
2.5	Activate emergency credit	Activate emergency credit on a specified meter.	N/A	30secs	EIS GIS
3.1	Display Message	Display a message on a specified meter.	24hrs	30secs	EIS GIS
3.2	Restrict Access For Change Of Tenancy	Set the Restrict Data flag on a specified Device.	24hrs	30secs	EIS GIS
3.3	Clear Event Log	Clear the event log on a specified Device.	N/A	30secs	EIS GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
3.4	Update Supplier Name	Update the Supplier name on a specified meter.	24hrs	N/A	EIS GIS
3.5	Reset Customer PIN	Service to set or disable privacy pin on a specified meter.	N/A	30secs	EIS GIS
4.1	Read Instantaneous Import Registers	Read the specified import register or matrix on a specified meter as soon as the Command is received by the meter.	N/A	30secs	EIS GIS ENO GNO
4.2	Read Instantaneous Export Registers	Read the specified registers on a specified meter as soon as the Command is received by the meter.	N/A	30secs	EES ENO
4.3	Read Instantaneous Prepay Values	Read the specified prepayment registers on a specified meter as soon as the Command is received by the meter.	N/A	30secs	EIS GIS
4.4	Retrieve Billing Data Log	Return the specified billing data log entry on a specified meter.	24hrs	30secs	EIS GIS
4.6	Retrieve Daily Read Log	Return the specified daily read log entry for a specified meter.	24hrs	30secs	EIS GIS EES

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
4.8	Read Profile Data	Return the specified date range of profile data from the profile data log for a specified meter.	24hrs	30secs	EIS EES GIS ENO GNO OU
4.10	Read Network Data	Retrieve stored power quality data from a Device for a specified Device ID.	24hrs	30secs	EIS GIS ENO GNO
4.11	Read Tariff	Read the current tariff settings (including price, time of use matrix and time of use blocks) that are in use on a specified meter, in addition to the payment mode status.	N/A	30secs	EIS GIS OU
4.12	Read Maximum Demand Registers	Retrieve the maximum demand register values recorded on a specified meter.	24hrs	N/A	EIS EES ENO
4.13	Read Prepayment Configuration	Read the specified meter's prepayment configuration settings	24hrs	30secs	EIS GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
4.14	Read Prepayment Daily Read Log	Retrieve the specified Daily Read Log entry on the specified meter.	24hrs	30secs	EIS GIS
4.15	Read Load Limit Counter	Retrieve the specified Load Limit Counter data on the specified meter.	24hrs	N/A	EIS ENO
4.16	Read Active Power Import	Retrieve the specified Active Power Import values on the specified meter.	N/A	30secs	EIS ENO
4.17	Retrieve Daily Consumption Log	Retrieve the specified Daily Consumption Log entry(s) on the specified meter.	24hrs	30secs	EIS GIS ENO GNO OU

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
6.2	Read Device Configuration	Retrieve the configuration data values for a specified meter.	N/A	30secs	EIS EES GIS SNA ENO GNO OU
6.4	Update Device Configuration (Load Limiting)	Configure the load limiting functionality on a specified meter, including, where specified, reset of the Load Limit Counter.	24hrs	30secs	EIS
6.5	Update Device Configuration (Voltage)	Configure the voltage thresholds on a specified meter.	24hrs	30secs	ENO
6.6	Update Device Configuration (Gas Conversion)	Configure the gas conversion values on a specified meter.	24hrs	N/A	GIS
6.7	Update Device Configuration (Gas Flow)	Configure the behaviour of the valve within a specified meter under specified conditions.	24hrs	N/A	GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
6.8	Update Device Configuration (Billing Calendar)	Configure the billing calendar for a specified meter and to subsequently provide the billing data in accordance with the billing calendar that has been set up.	24hrs for billing data	30secs for Device configuration	EIS GIS
6.11	Synchronise Clock	Synchronise a specified meter's clock with the time used by the Associated Communication Hub Function.	24hrs	30secs	EIS GIS
6.12	Update Device Configuration (Instantaneous Power Threshold)	Configure the ambient power thresholds on a specified meter for display on an IHD.	24hrs	30secs	EIS
6.13	Read Event Or Security Log	Retrieve the Event and/or Security logs for a specified meter.	N/A	30secs	EIS GIS ENO DNO SNA
6.14	Update Device Configuration (Auxiliary Load Control)	Configure the Auxiliary Load Control calendar and/or description for a specified Device.	24hrs	N/A	EIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
6.15	Update Security Credentials	Replace the Security Credentials held on the specified Device with the credentials contained with the Service Request.	24hrs	30secs	EIS GIS ENO GNO
6.17	Issue Security Credentials	Instruct a specified Device to generate a new Key Pair and issue a corresponding Certificate Signing Request	24hrs	N/A	EIS GIS
6.18	Set Maximum Demand Registers	To set the maximum demand register value(s) and timeframe on a specified meter.	24hrs	N/A	ENO
6.19	Set Device Configuration(Local Time Change Calendar)	Configure the Local Time Change Calendar for a specified meter.	24hrs	30secs	EIS GIS
6.20	Set Device Configuration(MPxN)	Configure the MPxN value for display on the specified meter.	24hrs	30secs	EIS EES GIS
6.21	Request Handover of DCC controlled Device	To replace the DCC's Security Credentials on a specified Device with the Security Credentials contained within the Service Request.	24hrs	30secs	EIS GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
6.23	Update Security Credentials (CoS)	To replace the supplier Security Credentials on a specified Device with the Security Credentials contained within the Service Request.	24hrs	30secs	EIS GIS
6.24	Retrieve Device Security Credentials	Retrieve the public Security Credentials from a specified Device.	24hrs	30secs	EIS GIS ENO GNO
7.1	Enable Supply	Enable electricity supply through a specified meter.	24hrs	30secs	EIS
7.2	Disable Supply	Disable electricity/gas supply through a specified meter.	N/A	30secs	EIS GIS
7.3	Arm Supply	Arm the supply on a specified meter such that it can be enabled by local interaction through that meter.	N/A	30secs	EIS GIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
7.4	Read Supply Status	Return the current supply status at a specified meter.	N/A	30secs	EIS EES GIS SNA ENO GNO
7.5	Activate Auxiliary Load	Activate the specified Auxiliary Load Control Switch (ALCS) for a specified Device.	N/A	30secs	EIS
7.6	Deactivate Auxiliary Load	Deactivate the specified Auxiliary Load Control Switch (ALCS) for a specified Device.	N/A	30secs	EIS
7.7	Read Auxiliary Load Control Switch Configuration	Retrieve the configuration information of a specified Auxiliary Load Control Switch (ALCS) for a specified Device.	24hrs	30secs	EIS ENO OU
7.8	Reset Auxiliary Load	To reset the specified Auxiliary Load Control Switch for a specified Device.	N/A	30secs	EIS
7.9	Add Auxiliary Load To Boost Button	Place the Auxiliary Load Control Switch under the control of the Boost button on a specified meter	24hrs	N/A	EIS
7.10	Remove Auxiliary Load From Boost Button	Remove the specified Auxiliary Load Control Switch from the control of the Boost Button on a specified meter	24hrs	30secs	EIS

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
7.11	Read Boost Button Details	Retrieve the details of the Boost Button on a specified Device.	24hrs	30secs	EIS OU
7.12	Set Randomised Offset Limit	Set the Randomised Offset limit on a specified meter	24hrs	N/A	EIS
8.1	Commission Device	Where relevant set time and display MPxN on a Device and, in any event, send commissioning message to the specified Device	N/A	30secs	EIS GIS
8.5	Service Opt Out	To replace the Security Credentials held on the Device with the Security Credentials contained within the Service Request and Withdraw the Device.	24hrs	N/A	EIS GIS
8.7	Join Service (Type 1 Devices)	To allow specified Devices to communicate with each other via the Home Area Network (HAN)	N/A	30secs	EIS GIS
8.7	Join Service (Type 2 Devices)	To allow a Type 2 device to receive data via the Home Area Network (HAN) ¹¹ .	N/A	30secs	EIS GIS OU

¹¹ To be reviewed once the rules on Consumer Access Devices have been further developed.

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
8.8	Un Join Service	To instruct specified Devices to cease communicating with each other via the Home Area Network (HAN).	24hrs	30secs	EIS GIS
8.8	Un Join Service (Type 2 Devices)	To stop a Type 2 Device receiving data via the HAN ¹²	24hrs	30secs	EIS GIS OU
8.9	Read Device Log	To retrieve Device IDs and Security Credentials for specified Devices on the Home Area Network (HAN)	24hrs	30secs	EIS GIS OU
8.11	Update HAN Device Log	To update the Communications Hub Function Device Log with details of Devices to either be added or removed from it.	24hrs	30secs	EIS EES GIS OU
8.12	Restore HAN Device Log	To replace the Device log of a specified CHF with the Device Log of a specified CHF.	24hrs	30secs	EIS EES GIS

¹² To be reviewed once the rules on Consumer Access Devices have been further developed.

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
9.1	Request Customer Identification Number	To generate and send a Customer Identification Number (CIN) to a specified meter and return the generated CIN to the sender of the Service Request.	N/A	30secs	OU
11.1	Update Firmware	To send a firmware image to a specified Device for storage on the Device.	5 days	N/A	EIS GIS
11.2	Read Firmware Version	To retrieve the firmware details that currently exists on a specified Device.	24hrs	30secs	EIS EES GIS SNA ENO GNO OU
11.3	Activate Firmware	Activate the specified firmware image stored on a specified Device	24hrs	30secs	EIS GIS
14.1	Record Network Data (GAS)	Record on a specified Device the gas consumption data at 6 minute intervals over a four hour period.	N/A	30secs	GNO

New SEC Content (Stage 2)

Service Ref	Service Name	User Gateway Service	Categories of Service Available		User Role
			Future dated	On Demand	
A1	Device Alert	To send the details of an event generated by a Device to a defined Known Remote Party in the message.	N/A	60secs	EIS GIS ENO GNO
A2	DCC Alert	To send the details of an event in relation to one or more CHF's generated by the DCC to the relevant User.	N/A	60secs	EIS EES GIS ENO DNO

Notes:

Scheduled Services:

4.6, 4.8, 4.10, 4.12, 4.14, 4.15, 4.16, 4.17 can also be requested as a Scheduled Service but where so requested, have a Target Response Time of 24 hours from the time and date for execution specified in the Service Request.

Type 2 Devices: Only the following Services are available in relation to Type 2 Devices:

- 8.7 Join Service (Type 2);
- 8.8 Unjoin Service (Type 2); and
- 8.11 Update HAN Device Log.

Local Command Services:

- Where Devices have a status in the Smart Metering Inventory of “Pending”, “Installed Not Commissioned” or “Commissioned” all Services, available to the EIS, EES , GIS or SNAs can be requested such that the resulting Command(s) is sent to the requestor via the DCC User Gateway (‘Local Command Services’); and
- where Devices have a status of “Installed Not Commissioned” or “Commissioned” in the Smart Metering Inventory, all Services available to the ENO, GNO or OU can be requested such that the resulting Command(s) is sent to the requestor via the DCC User Gateway (‘Local Command Services’).

Table 5.2: Service Requests that instruct the DCC to undertake an activity

UGC Ref	Activity	User Gateway Service Description	Categories of Service		Eligible User
			Future dated	On Demand	
5.1	Create Schedule	To create a schedule to provide the specified Service on a recurring basis where the Service is identified as available as a Scheduled Service.	N/A	24hrs	EIS EES GIS ENO GNO OU
5.2	Read Schedule	To return details of the requester’s schedule held by the DCC for a specified meter.	N/A	24hrs	EIS EES GIS ENO GNO OU

New SEC Content (Stage 2)

UGC Ref	Activity	User Gateway Service Description	Categories of Service		Eligible User
			Future dated	On Demand	
5.3	Delete Schedule	To delete all of the details stored by the DCC for the specified schedule to prevent any future recurring commands to the specified Device.	N/A	24hrs	EIS EES GIS ENO GNO OU
8.2	Read Inventory	To obtain Device details held within the DCC inventory by reference to: the Device ID, in which case the User should be able to extract all information held in the inventory in relation to (I) that Device, (II) any other Device Associated with the first Device, (III) any device associated with any other such Device; and (IV) any Device with which any of the Devices in (I), (II) or (III) is Associated; the MPAN or MPRN, in which case the User should be able to extract all information held in the inventory in relation to the Smart Meter to which that MPAN or MPRN relates, or in relation to any Device Associated with that Smart Meter or with which it is Associated; post code and premises number or name, in which case the User should be able to extract all information held in the inventory in relation to the Smart Meters for the MPAN(s) and / or MPRN linked to that postcode and premises number or name, or in relation to any Device Associated with those Smart Meters or with which they are Associated; the UPRN (where this has been provided as part of the Registration Data), in which case the User should be able to extract all information held in the inventory in relation to the Smart Meters for the MPAN(s) and/or MPRN linked by that UPRN, or in relation to any Device	N/A	30secs	EIS EES GIS SNA ENO GNO OU

New SEC Content (Stage 2)

UGC Ref	Activity	User Gateway Service Description	Categories of Service		Eligible User
			Future dated	On Demand	
		Associated with those Smart Meters or with which they are Associated; provided that there is no requirement for the DCC to provide information held on the inventory in respect of Type 2 Devices.			
8.3	Decommission Device	To update the SMI status of a specified Device to 'Decommissioned'.	N/A	30secs	EIS EES GIS
8.4	Update Inventory	To update the SMI status of a specified Device held within the SMI to a new status as specified within the Service Request	N/A	30secs	EIS EES GIS OU
8.6	Service Option	To provide the DCC Security Credentials to the requestor.	24hrs	N/A	EIS GIS
8.13	Return Local Command Response	To return to the DCC the response from a Device obtained as a result of a locally executed Command.	24hrs	30secs	EIS EES GIS
12.1	Request WAN Matrix	To obtain details stored in the DCC about Wide Area Network (WAN) technology availability for a specified area/address	N/A	30secs	EIS EES GIS SNA

New SEC Content (Stage 2)

UGC Ref	Activity	User Gateway Service Description	Categories of Service		Eligible User
			Future dated	On Demand	
12.2	Device Pre-notification	To provide the DCC with details of Devices that are intended to be installed and commissioned which are stored in the DCC Inventory with a status of Pending	N/A	30secs	EIS EES GIS

Table 5.3: Monthly Service Metrics

The following table sets out the Monthly Service Metrics and associated Monthly Service Thresholds in relation to certain Services.

Eligible User	Service Ref	Monthly Service Metric (measurement for each User and determined in relation to each month, m)	Monthly Service Threshold (Service Requests and Responses sent per smart metering system)
EIS GIS	3.1 Display Message	The total over month m and the previous eleven months of the number of Service Requests*; divided by the User ASMS _m .	24
EIS EES GIS	4.8 Read Profile Data	The number of Service Requests* in month m, divided by the number of Smart Metering Systems Enrolled by that User on 15th day of month m.	Number of calendar days in the month
EIS GIS	11.1 Send Firmware	The total over month m and the previous eleven months of the number of Service Requests*; divided by the User ASMS _m .	6
ENO GNO	4.8 Read Profile Data	The number of Service Requests* in month m divided the numbers of Enrolled Smart Metering Systems on 15th day of month m for which the User is the Electricity Distributor or Gas Transporter (as the case may be).	$10^{-3} \times 48 \times$ number of calendar days in month m
ENO GNO	4.8 Read Profile Data	The total over month m and the previous eleven months of the number of Service Requests*; divided by the User ASMS _m .	4
ENO	4.10 Read Network Data	The number of Service Requests* in month m divided the numbers of Enrolled Smart Metering Systems on 15th day of month m for which the User is the Electricity Distributor or Gas Transporter (as the case may be).	$10^{-3} \times$ number of Calendar days in month m

Eligible User	Service Ref	Monthly Service Metric (measurement for each User and determined in relation to each month, m)	Monthly Service Threshold (Service Requests and Responses sent per smart metering system)
ENO	4.10 Read Network Data	The total over month m and the previous eleven months of the number of Service Requests*; divided by the User ASMS _m .	4

* In each case, Service Requests of the relevant type sent by that User.

The User ASMS_m is determined in relation to each relevant month m as:

- for each Supplier, the mean of the numbers of Smart Metering Systems Enrolled by that Supplier on 15th day of month m and each of the previous 11 months; and
- for each Network Operator Party, the mean of the numbers of Enrolled Smart Metering Systems on 15th day of month m and each of the previous 11 months for which it is the Electricity Distributor or Gas Transporter (as the case may be).

For each User, the First Service Month shall be the month following the month in which that User first sends a Service Request (of any type).

No Monthly Service Metric shall be determined for a User in relation to any month prior to that User's First Service Month.

Where a Monthly Service Metric is to be determined for a User which includes a requirement to determine the number of Service Requests of a particular type sent over a time period which includes any time prior to that User's First Service Month then:

- the Monthly Service Metric for that User shall be the value determined in accordance with the table above, multiplied by twelve and divided by number of month in that time period prior to the First Service Month; and
- for the purposes of determining ASMS_m any months prior to the First Service Month shall be disregarded.

Annex 4: SEC1 with SEC2 amendments laid in Parliament immediately (Clean)

This legal text is available separately from: <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

Annex 5: SEC1 with SEC2 amendments laid in Parliament immediately (Change marked)

This legal text is available separately from: <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

Annex 6: SEC3 with SEC2 amendments set out in this Government Response (Clean)

This legal text is available separately from: <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

Annex 7: SEC3 with SEC2 amendments set out in this Government Response (Change marked)

This legal text is available separately from: <https://www.gov.uk/government/consultations/new-smart-energy-code-content-stage-2>

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