

Smart Metering Implementation Programme -  
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29<sup>th</sup> November 2013

Dear Sir/Madam,

**Response to Smart Metering Implementation Programme, a Consultation on New Smart Energy Code Content (Stage 2)**

Electricity North West, as a signatory to the Smart Energy Code (SEC), has an interest in the proposals associated with the consultation on New Smart Energy Code (Stage 2). We understand there is a need for change and to consider how information is obtained between industry parties (including registration agents) but we are concerned that the obligations are in addition to those current in place under the Master Registration Agreement (MRA).

When you consider that the ownership of registration services (amongst other services) is currently being debated by Ofgem under the smart markets initiative with a recent request for information, received from the Change of Supplier Expert Group entitled 'Change of Supplier Implementation Options', under industry review, we believe that such additional obligations should not be considered until the outcome of such a review is known. There are no long term benefits, in delivering an improvement where costs are expended, with the resulting increase in consumer bills, which are then, disbanded due to centralisation.

We are concerned over the level of security proposed in the consultation, we have been operating and handling communication flows between industry parties for many years without such a strict and high level regime. The impact of such is once again, increased costs for little if no benefit to consumers who ultimately pick up such costs with increased fuel bills.

We are also concerned over the modification to K7.5A which now refers explicitly to the DCC User Gateway Services thereby making them part of core services as stated in the Core Communication Services definition. We do not believe that the likes of 'first breath' and 'last gasp' alerts should be included as an Explicit Charge. We believe this a fundamental change to our understanding of the charges relating to the DCC.

In relation to DECC seeking views on this consultation please find enclosed our response to the questions raised.

Yours sincerely,

## Responses to Consultation

### 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.**

Electricity North West agrees with the proposed text for SEC with regards to Governance and Change control as it sets out the requirements to establish a Technical Sub-Committee (TSC). This provides additional technical expertise with regards to change proposals, modifications and reviews of the Technical Specifications and End to End Technical Architecture of the Smart Metering Systems.

### Registration Data

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

Electricity North West does not agree with the proposed text with respect to Registration, and the rationale has been documented against each relevant clause number.

E1.1 – the inclusion of 'three hours' does not give anyone confidence that the system is up to date. There should be a defined time of day that the refresh is undertaken by so that each party is aware of the status of the system.

E2.1 – Not all the data items listed in this section are available, nor should they be made available) within the registration system neither are they capitalised expressions, these are; Source Registration System ID, Network Operator ID, Network Operator ID effective from date. Also:

(e) Supplier ID effective to date – this is not being sent on any daily file. It only shows who the current supplier is.

(m) Profile Class ID – why are we not also sending the effective from date as this is being provided for the other mentioned data items and is available in the registration system.

(o) Objection Details - we need to be more definitive. This should state which ones that are required from the registration system.

E2.3 – we can understand the data being provided for export Metering Point Administration Numbers (MPANs) as the Profile Class for export is 8 for Domestic and 0 for non-domestic and therefore will require differentiating from the import MPANs, but not required for import MPANs since this will be known from the data sent by the Metering Point Administration Service.

E2.5 – Electricity North West believes in this section that the actual data items to be sent to the registration systems from the DCC should be defined and listed in the SEC together with their effective from and to dates.

E2.6 – We read this to say after the initial take up, updates will be incremental. We believe the reference to E2.6 should only reference E.2

E2.7 - The current registration systems are operational on working days only as per the MRA. If the DCC expectation is to have daily updates 7 days a week then there will be a change to the MRA and a cost impact on registration providers to operate a daily service. This seems to be adding costs for what may be seen as a limited shelf life should registration services ultimately

form part of the DCC in the next few years. Until the home of registration services is known there should be minimal changes to the service offered.

**E2.8 –** Currently the MRA states that if a party (including DCC) requests a full refresh then the registration provider will respond within one working day of receipt indicating a schedule date for the full refresh which will be within 15 working days of the request, if this is to change then the MRA and the SEC need to be aligned. The registration data providers operate on working days only; therefore the timescale for providing the full refresh should be in working days. It takes approximately 56 hours to run a full refresh on the registration system therefore the timescale of two days with the current infrastructure would not be achievable. The MRA would need to change to accommodate this and, as indicated earlier, will be an additional cost to the registration service providers. If the registration service is ultimately to be within the DCC it is a wasted cost incurred by the industry for a limited benefit. We should be seeking minimal change to the MRA and the DCC should live with the current industry arrangements until the home for the registration process is known.

**E2.14 –** Registration providers have to comply with the security obligations set out within the MRA therefore the MRA and SEC security obligations and compliance should be aligned.

**Q3 –** 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 new data item which accurately reflects non-domestic meter registration, or should the DCC continue to use profile class 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.

Electricity North West believes that the Profile Class should be used as a proxy to estimate the number of non-domestic meter points registered to users. As the Suppliers are responsible for updating this data item within the registration systems it does not seem sensible for the Suppliers to provide any other information separately and would probably use the Profile Class to determine this data. To introduce a new data item would increase risk on data quality and additional costs for system changes with no benefit, the DCC could introduce this at a later stage should registration data form part of the DCC at that time.

**Q4 –** 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?

Electricity North West believes any requests for data from the registration systems should be in working days as the service is operational on working days as per the MRA and amending this could bring significant costs to companies. Electricity North West could not provide a full refresh within two working days as this takes approximately 56 hours to run. The MRA currently states a full refresh is to be scheduled within 15 working days of the request which is reasonable.

Selective refreshes could be provided in one working day if received before 15:00hrs providing there is a threshold on the number of selective refreshes to be provided. The MRA currently states the threshold is 50 requests and if this number is reached then 5 requests should be actioned for each party (as Suppliers and Data Aggregators can request refreshes) allocated in the order they have been received. As it is difficult to determine the volume of requests from the DCC then it would seem sensible to keep it to the MRA obligations until more information is

available. In summary it is sensible to align with the MRA obligations until the destiny of the registration service is known.

#### **DCC User Gateway**

**Q5 – Do you agree with our proposed text for the SEC with respect to the DCC User Gateway? Please provide rationale for your views.**

Electricity North West agree with the proposed text for the SEC with respect to the DCC User Gateway as this sets out the provisions for established connections between Users and the DCC User Gateway. It also sets out the requirements regarding the installation, use and removal of DCC User Gateway equipment.

#### **DCC User Gateway Service 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 rationale to your views.**

Electricity North West does not agree with the some of the proposed text with respect to the DCC User Gateway Services and Service request Processing.

**H3.4 – Does not include the provision of enrolment data (Device\_id) unless this is to be covered by the Registrations Data Interface Specification?**

**H3.24 – This clause states that all Service Requests; Future Dated Services and Scheduled Services will be cancelled after the DCC has received a Service Response to 'Restrict Access for Change of Tenancy' occurs. It may be applicable to cancel other Users requests however as the Network Operator will not change for the Smart Metering System there is no reason to cancel Network Operator requests.**

**H3.38 & H3.43– with regards to the obligations of providing forecasts of the number of requests, six months in advance will not be achievable during the Supplier Smart Meter Rollout unless Network Operators are provided with accurate forecasts of the number of meter installations to be undertaken by the Suppliers.**

#### **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.**

Electricity North West does not agree with some of the proposed text for the SEC with respect to Parsing and Correlation.

**H11.5 – There should be additional detail to cover the User obligations and timescales for implementing new versions of the Parse and Correlate software into their systems. This is to maintain compatibility and enable Users to effectively plan and manage version upgrades of their systems. The DCC should support at least two version releases of Parse and Correlate**

software save for exceptional; circumstances e.g. a significant security flaw/risk which would otherwise require all Users to update at the same time.

#### **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 to your views.**

Electricity North West does not agree with some of the proposed text for SEC with respect to Enrolment in the Smart Metering Inventory and other associated processes. Enrolment also needs to cover the DCC responsibilities to notify DCC Services Users of enrolled systems including a mechanism to notify the relevant Device\_id(s) to Users. Furthermore where a DCC User does not participate at initial DCC go-live then there needs to be a method for the DCC to provide all relevant Device\_id's at such time as the User commences participation.

H6.10 – It is preferable to have a defined timescale for the DCC to notify Network Operators or Gas Transporter on the withdrawal or decommissioning of a smart metering system, rather than 'reasonably practical'.

#### **Intimate Communications Hub Interface**

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

Electricity North West has concerns regarding the ICHIS being freely available on the DCC Website, and believe it is a security risk. The ICHIS should be in a section of the DCC Website which requires a password as with other industry code websites.

#### **DCC Service Management**

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

Electricity North West agrees with the proposed text for the SEC with regards to DCC Service Management as it follows the ITIL principles and sets out the provisions relating to implementation timetables for modification proposals, Release Management and maintenance of DCC systems.

#### **Incident Management**

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

Electricity North West agrees with the proposed text for the SEC with regards to Incident Management as it follows the principles of ITIL. It also includes content and responsibilities of the Incident Management Policy, development, maintenance and access to an Incident Management Control Log, concepts of a Major Incident and that the SEC panel will determine any disputes relating to Incident Management.



### **Self-Service Interface**

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

Electricity North West agrees with the proposed text for the SEC with regards to the Self Service Interface as it sets out the provisions for use and maintenance of the Self-Service interface.

### **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.**

Electricity North West agrees with the proposed text for the SEC with regards to the DCC Service Desk as it provides a contact for Users 24/7 365 per annum which can be accessed by SEC parties and Users via telephone, e-mail or Self Service Interface.

### **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.**

Electricity North West agrees with the proposed text for the SEC with regards to the Service Level Agreements for Testing as it sets out the measures for the performance of the DCC. The DCC will have to explain if it is under target and if it fails to meet the minimum requirement report on the steps taken to rectify.

**Q15 – Does the inclusion of DCC aggregate performance measures in the SEC, and the consequential reduction in future service charges, appropriately balance and 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 provide a rationale for your views.**

Electricity North West does not believe the inclusion of DCC aggregate performance measures in the SEC are sufficient for the DCC to manage its Service Providers flexibly. There should be a breakdown to each DCC Service provider to aid transparency and ensure individual Users are not being disproportionately disadvantaged.

### **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.**

Electricity North West agrees with the proposed text for SEC with regards to Managing Demand as it enables the DCC to manage the service capability by the Users providing six monthly forecasts. The DCC will provide a monthly comparison report for each User on the actual number of requests against the forecast which will show if the User has reached or exceeded the threshold.

It should be noted that Network Operators will have difficulty providing Demand Forecasts during the Suppliers meter rollout unless the Suppliers themselves provide an accurate number of smart meter installations to be undertaken.

## **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?**

Electricity North West does have some comments regarding the Security Obligations set out in Section G and the definition of Security Check;

G4.1 – this clause states that Users should be vetted to BS7858:2012 which includes financial status checks such as CCJ and credit checking which Electricity North West do not currently carry out. Is this level of financial checking applicable to Network Operators engineering operations?

G5.13 – this clause states that Users information and security must comply with ISO27001:2013, in previous Smart Meter documentation (presumably written prior to 2013) refers to ISO27001:2005. Is ISO27001:2013 the definitive standard to follow?

Security Check definition – UK Government vetting procedures can only be applied if you work on a Government contract or need access to Government classified information and have a sponsor. Electricity North West employees do not normally have UK Government clearance. As a private company, Electricity North West can do similar checks to the UK Government Baseline Personnel Security Standard (BPSS) which is to ensure Users hold valid Photo ID, have a valid NI number and have the right to work in the UK (work permit or residency status) Is this level of checking sufficient?

### **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?**

Please see comment on clause G4.1 in question 17.