

Smart Metering Implementation Programme

A Consultation on New Smart Energy Code Content (Stage 2) Response

29th November 2013

Introduction

Smart DCC Ltd, the Data Communications Company (DCC) was granted the Smart Meter Communication Licence and acceded to the Smart Energy Code (SEC) on 23rd September 2013.

The Department of Energy & Climate Change (DECC) subsequently issued 'A Consultation on New Smart Energy Code Content (Stage 2)' on 17th October 2013 and invited responses from interested parties by 29th November 2013.

This document provides a set of responses from DCC to the questions set out in the consultation document.

Where appropriate, DCC has invited comments from its Service Providers. The resulting response has been informed by this input, however this response is from DCC. The Service Providers are:

Data Service Provider – CGI IT UK Ltd

Communications Service Provider (North) – Arqiva Smart Metering Ltd

Communications Service Provider (Central and South) – Telefónica Ltd.

DCC broadly agrees with the proposed drafting, with any comments or concerns provided against individual questions within Section 2.

Alignment with Service Provider contracts

DCC notes that in the main, the proposed drafting is reflective of the Service Provider contracts. Where this is the case, if this consultation results in a change to the proposed SEC drafting, changes to the Service Provider contracts may be required, potentially leading to increases in DCC's External Costs.

Misalignment with Service Provider contracts

DCC has identified some differences between the Service Provider contracts and the proposed SEC drafting. There are two scenarios:

Where DCC believes the SEC drafting needs to be changed, an explanation of these changes has been included in our response

Where DCC believes that the proposed SEC drafting is correct and changes are required to the Service Provider contracts. These instances have not been identified in this response. DCC needs to have a degree of clarity prior to incurring any further cost of change. However, these changes will be required prior to the likely date by which DECC will issue the outcome of the consultation to enable DCC to meet its design milestones up to the end of February 2014. DCC will engage with DECC outside the consultation process to ensure that short term design decisions are made against the most likely outcome.

If you have any questions regarding these responses please address them to:

REDACTED REDACTED
REDACTED REDACTED

DCC Response

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.
A1	DCC agrees with the proposed text for the SEC with respect to Technical Governance and Change Control.
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.
A2	<p>DCC agrees with the proposed text for the SEC with respect to Registration Data with the exception of the following:</p> <p>(i) DCC Data Systems will rely on the Registration Data provided as per Section E for the purpose of access control. DCC recognises that under MRA where there has been a change of supplier followed by an objection, the temporarily gaining supplier is considered to have never had responsibility for that MPAN. In this scenario, for DCC to apply the same principle, the Registration Data outlined within E2.1 would also require the addition of 'objection details effective date'.</p>
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 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.
A3	<p>DCC's preferred solution would be that industry creates a new data item in meter registration data that specifies whether a meter is domestic or non-domestic, and that this data is provided by the Registration Service Providers. This approach would provide a more reliable data source and by adding it to existing Registration Data, processing will be simplified in both the short and long term.</p> <p>This will require the addition of this data item to E2.1 and E2.2.</p> <p>Currently the definition for Mandated Smart Metering System in K11.1 is "each MPAN or MPRN associated with a Domestic Premises (regardless of whether or not a Smart Metering System has been installed or Enrolled), but excluding those MPANs and MPRNs associated with premises in respect of which the DCC is exempted from the requirement to Enrol Smart Metering Systems in accordance with the Statement of Service Exemptions." DCC notes that as drafted, where an MPAN exists but has not been energised or disconnected MPANs, the drafting</p>

	<p>could be interpreted to suggest that a Monthly Fixed Charge should be applied to that MPAN for the Network Provider. DCC would suggest that this definition is amended to provide clarity on the MPAN status to which a Mandated Smart Metering System applies. In addition, to support this and any future amendments to the Charging Methodology, DCC proposes the addition of the following fields:</p> <p>Within E2.1:</p> <ul style="list-style-type: none"> MPAN status MPAN status effective date <p>Within E2.2:</p> <ul style="list-style-type: none"> The equivalent fields for MPRN status.
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>
A4	<p>DCC Services are provided 24/7/365 and as such DCC requires a low latency for external data. A 'data refresh' would only be requested from RDPs by DCC on occasions where there is significant corruption or misalignment of registration data, and DCC is unable to roll back the data. As such DCC anticipates this being a very infrequent occurrence.</p> <p>However, where this scenario occurs, it is likely to be categorised as a Major Incident, and may affect tens of millions of Smart Metering Systems. As such the resolution time would require the provision of a 'data refresh' as quickly as possible.</p> <p>A Priority 1 incident will have a resolution time of 4 hours. To meet this timescale, DCC would require a 'data refresh' within 3 hours to have any chance of meeting the 4 hour timeline.</p> <p>DCC recognises that this may be a challenge to the RDPs. If the measure is 2 calendar days, then the incident resolution time would need to be amended to allow for this, leading to degradation of service to all Service Users. This may mean that either:</p> <ul style="list-style-type: none"> (i) some Service Requests are processed against potentially incorrect registration data and may reduce the accuracy of DCC Access Control for up to 48 hours until the refresh is completed or (ii) some Service Requests can not be processed for up to 48 hours.

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>
A5	<p>DCC agrees with the proposed text for the SEC with respect to the User Gateway, with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) DCC notes that in H1.11d there has been a change from 'Party' to 'person'. Is this correct? The term 'Party' is used in all other paragraphs of this section and DCC believes this would be the correct term. (ii) In H3.5 it would be helpful to clarify that whilst the DCC will provide the equipment required for the DCC User Gateway Means of Communication, there will be an Explicit Charge (which needs to be added to K7.5) for this.

- (iii) DCC anticipates that the equipment required for the DCC User Gateway Means of Communication would need to be ordered and installed in advance of User Integration Testing. As such, the relevant clauses within Section H would need to be made effective earlier than currently anticipated through an amendment to Section X2. Further consideration will be given by DCC to all parts of Section H and the point in time that they need to become effective.
- (iv) H3 refers to the DCC User Gateway Code of Connection. The definition for this in Section A suggests that there is a standard Code of Connection provided as a SEC Subsidiary Document. In practice, DCC anticipates a standard Code of Connection, with a number of Annexes that contain tables that are specific to the individual User covering, for example, specific anomaly detection thresholds and volume profiles. The definition in Section A should be amended to reflect this.

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.
A6	<p>DCC agrees with the proposed text for the SEC with respect to the DCC User Gateway Services and Service Request, with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) H3.16 makes reference to Eligible Users. The definition of Eligible User in Section A refers to Section H3.13. DCC believes this should refer to Section H3.14. (ii) H3.22 makes reference to CHTS. Section A does not include a definition for CHTS. DCC believes this definition (and the definition of SMETS) should make reference to the version in effect at the time of installation (this concept is reflected in the definition of Smart Metering System in the Licence, however this is not aligned with the definition in the SEC). (iii) The introductory text to H4.9 includes the phrase “the DCC shall provide an Acknowledgement to the User, and then apply the following checks:”. This is implying a specific technical solution and the proposed DSP design solution is delivered through web services as the interface message solution. As a result, all the checks are still carried out but not after sending an Acknowledgement to the Users. Instead, some of the checks are performed in line as part of a synchronous web service call. As a result DCC suggests that the drafting is amended so that it states that the DCC will carry out all the checks required, but does not put a dependency on the Acknowledgement being provided prior to the checks being made.

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.
A7	<p>DCC agrees with the proposed text for the SEC with respect to Parsing and Correlation, with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) H11.4 (a) (i) states that the Parse and Correlate software must not ‘adversely

	<p>affect the operation of other software deployed within the same system environment'. Any software may have an adverse effect on other software if there is no change in memory or processing capacity. As such DCC suggests that this drafting is amended to state that the software must not 'materially adversely affect the operation of other software'.</p> <p>(ii) H11.7b) states that DCC will need to 'provide suitable opportunities for Acceptance Testing' to any person. H11.7c) states that DCC will need to 'use reasonable endeavours to ensure that any User who wishes to participate in that Acceptance Testing is able to do so'. DCC agrees with the drafting of H11.7c), however H11.7b) may lead to unnecessary costs to supporting Acceptance Testing for any person, providing no constraint on the potential costs involved in supporting non-SEC Parties. DCC propose that H11.7b) is deleted.</p> <p>(iii) DCC recognises the intent that Users would pay an Explicit Charge for the assistance outlined in H11.12 (a). However, DCC believes that a constraint is required on the number of historic versions of the Java Virtual Machine/Runtime Environment for which this assistance can be provided. This is because legacy support will become increasingly complicated and expensive over time.</p>
--	--

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.
Q8	<p>DCC agrees with the proposed text for the SEC with respect to Enrolment in the Smart Metering Inventory and other associated processes, with the exception of the following comment:</p> <p>(i) H5.29 refers to H5.27. DCC believes that this should refer to H5.28.</p>

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.
A9	<p>DCC agrees with the proposed text for the SEC with respect to the Communications Hub Intimate Physical Interface with the exception of the following comments:</p> <p>(i) H12.2 states that the 'ICHIS describes a specification for the physical, electrical and data interface' between the Communications Hub and a Smart Meter or a Communications Hub Hot Shoe. With respect to the 'data interface', DCC intends that the ICHIS will describe the physical data connectors. DCC suggests that 'data interface' is changed to 'physical data connectors' for the avoidance of doubt as the ICHIS will not define the 'data interface' in its broadest sense (i.e. the data standards, etc).</p> <p>(ii) H12.2b) refers to the connection to a Smart Meter. As the ICHIS can only apply to an Electricity Smart Meter, DCC believes this should be amended to avoid any doubt.</p>

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.
A10	<p>DCC agrees with the proposed text for the SEC with respect to DCC Service Management, however DCC disagrees with the current drafting of H8.3.</p> <p>H8.3 limits the Planned Maintenance of the DCC Systems by the DCC to between 20:00 and 08:00, and to no more than 4 hours in any month.</p> <p>DCC Systems are broadly defined as “the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code, including the SM WAN but excluding the Communications Hub Functions.” DCC Systems therefore include a wide range of types of systems and components, provided by a range of providers with their own contractual obligations related to planned maintenance.</p> <p>The optimal maintenance window for each component will be different. For example, applying a new release to a core component such as the DCC User Gateway Interface would most logically be applied between 20:00 and 08:00. However, repositioning an aerial on the edge of the SM WAN would need to be applied during daylight hours for health and safety reasons.</p> <p>Additionally, for the Central and South region, the Service Provider Contract only recognises Severity Level 4 Incidents or above (affecting 30,000 or more end points) as the trigger threshold for the planned maintenance process.</p> <p>As a result, DCC believes that the drafting needs to be amended to reflect the above points. DCC proposes that:</p> <ul style="list-style-type: none"> (i) In H8.3 Planned Maintenance obligations should only apply when DCC expects the impact of any maintenance to have an impact to services of a Severity Level 4 Incident or above. (ii) In Section A the definition of material disruption within the definition of Material Risk is clarified to mean a service outage (rather than service degradation). (iii) In H8.3 the period is increased from 4 hours to reflect that there are multiple Service Provider Contracts with a 4 hour period and DCC will not necessarily be able to ensure that these periods are fully aligned across all Service Providers.

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.
A11	<p>DCC agrees with the proposed text for the SEC with respect to Incident Management with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) DCC anticipates that, in practice, on identification of an incident, a User should attempt to resolve the incident by either A) sending a Service Request

	<p>as outlined in H9.2a), B) using diagnostic tools provided through the Self Service Interface, C) ensuring that all steps outlined in the relevant Support Materials have been followed or D) undertake any other steps in their gift. The current drafting only allows for the User to send a Request to resolve the incident.</p> <p>(ii) Following on from point (i) above, only once all these steps have been undertaken should a User raise an incident to DCC. DCC believes that there should be an additional clause inserted between H9.2a) and H9.2b) that makes this explicitly clear. This would make it clearer that Users must first attempt to resolve the incident themselves before raising it as a DCC Incident.</p> <p>(iii) H9.7a) refers to Incidents for which a User is responsible. DCC believes that the intent is that where a User raises an Incident for which the resolution resides with a User (e.g. need to replace the Communications Hub), the User responsible for the resolution will be the User who first raised the incident, unless this User can not resolve the incident (e.g. if this is a Network Operator), in which case it would be the responsibility of the Lead Supplier. If this interpretation is correct, the drafting of H9.7 would benefit from this being made clear.</p>
--	---

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.
A12	<p>DCC agrees with the proposed text for the SEC with respect to the DCC Self Service Interface with the exception of the following comments:</p> <p>(i) H8.15d)ii) refers to the date by which coverage will be available. DCC notes that this date may not be known. In a small number of very specific situations it may even have been decided that, until a further review of Service Exemptions has been conducted, this date may essentially be 'never'. For the avoidance of doubt, the drafting could make it clearer that this is a possible scenario.</p> <p>(ii) DCC believes that the drafting of H8.5e)iii) is prescriptive with respect to a design that has not yet been finalised by the DCC. For example, under (A), whilst the DCC may provide Supplier Parties with acknowledgement of receipt of an order, it will not be able to accept or reject an order until all Supplier Party orders have been received for the month, and the aggregate order can be compared by the DCC against the aggregate forecast for each Communications Hub variant. If this level of detail is required in the SEC drafting, the status options under (A) should be 'acknowledged and pending', 'fully accepted', 'partially accepted' and 'rejected'.</p>

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.
A13	<p>DCC agrees with the proposed text for the SEC with respect to the Service Desk with the exception of the following comment:</p> <p>(i) DCC believes that there are three channels for contacting the DCC Service</p>

Desk. These are (in order of preference of use) A) raising an incident over the Self Service Interface B) email C) telephone. DCC believes H8.18 needs to recognise the Self Service Interface channel and that it would best be restructured to make it clear that this is the preferred form of engagement for Service Users. This will provide clarity, will minimise DCC Service Management costs for the benefit of all Parties and allow the DCC to respond to major incidents in a controlled manner.

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.
A14	DCC agrees with the proposed text for the SEC with respect to the Service Level Agreements, with the exception of the following comment: (i) With regard to SEC conditions H13.4 and H13.5, it is the view of DCC that the Service Levels achieved in respect of each Performance Measure by each Service Provider will be considered as Commercially Sensitive Information by the Service Providers. Therefore, in line with the Service Provider contracts the DCC would be prevented from publishing such information on its web site.
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.
A15	DCC agrees that the approach provides the appropriate level of balance.

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.
A16	DCC agrees with the proposed text for the SEC with respect to Managing Demand with the exception of the following comment: (ii) H3.38 obliges Users to provide 6 month forecasts on a quarterly basis. The Service Provider contracts require the DCC to provide the Service Providers with 3 months of forecast transactions and a further 3 months of anticipated transactions. If H3.38 required Users to provide 8 months of forecast data on a quarterly basis, the data would be available for the DCC to provide the data required to its Service Providers. Alternatively, Users could provide 6 month forecasts on a monthly basis.

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?
A17	<p>DCC agrees with the security obligations set out in Section G of the SEC drafting and the way they are expressed with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) Within Section G the term 'User Information Security Management' is used. This is not defined within Section A. (ii) G2.9(b) requires the DCC to detect any instance in which it has been compromised. DCC believes that, as with G2.9(a), this should be on a best endeavours basis as it is not possible to guarantee any compromise is detected. (iii) Following on from (ii) above, G2.10 states the steps the DCC must undertake on the 'occurrence' of events. DCC believes this should be steps undertaken on the 'detection' of the same events. (iv) G2.20 refers to the separation of DCC IT Testing and Training System from Live Systems. DCC would also anticipate the separation of any Development Environments, which are not currently explicitly included in any of the related defined terms.
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?
A18	DCC has no comments on the appropriateness and / or the proportionality of the security obligations in relation to particular types of DCC Service Users and their role.

Communications Hub Financing

Q19	Do you agree that the four additional provisions are proportionate responses to providing reliable and economic third party financing options for Communications Hubs?
A19	<p>DCC broadly agrees that the four additional provisions are proportionate responses to providing reliable and economic third party financing options for Communications Hubs with the exception of the following comments:</p> <ul style="list-style-type: none"> (i) J1.6 (DCC Account, direct payment to the CHuRP) – This condition states that 'payments shall be made in pounds sterling by transfer of funds to the credit of the account or accounts of the DCC.....' This needs to be amended to allow for payment to a specific account (or accounts) of the CHuRP. The rationale for this proposed amendment is to ensure that the SEC conditions are in line with the conditions of the Direct Agreement for the financing of the CSP Communications Hubs. (ii) Smart Meter Communication Licence (DCC Account) - In order for the Licence Conditions to be compatible with the direct payment process, there will also need to be an amendment to Annex 1 of Schedule 5 of the Licence so that a bank account may be set up in the name of the CHuRP. The rationale for this proposed amendment is that the current Licence Conditions only allow for Licensee revenues to be paid into a bank account in the Licensee's name.

- (iii) M11.5(b)(i) – the reference to ‘that event’ should be replaced with a reference to ‘a Communications Hub Finance Acceleration Event’.
The rationale for this proposed amendment is to provide clarity with respect to the type of event which would trigger the rights of the Approved Finance Party.
- (iv) Section A – Definitions – It is proposed that the following definitions are amended:
- a. ‘Approved Finance Party’ – Please replace ‘the person’ with ‘each person’
The rationale for this proposed amendment is that as more tranches of finance are entered into, there is a possibility that there may be further Direct Agreements in the future.
 - b. ‘Communications Hub Finance Acceleration Event’ – This definition would benefit from making it explicit that in such an event the DCC would be liable under the Direct Agreement for the unamortised asset value and finance charges and costs as specified in the definition of the Base Termination Amount.
The rationale for this proposed amendment is to provide clarity regarding DCC’s liability for the Base Termination Amount under the circumstances of a communications Hub Finance Acceleration Event as detailed in the Service Provider contract.
 - c. ‘Communications Hub Finance Facility’ – Please replace ‘exclusively’ with ‘primarily’.
The rationale for this proposed amendment is that the relative facility will be primarily for the purchase of the Communications Hubs but may also be used for CHuRP administration costs.

Communications Hub Services

Q20	<p>Views are invited on the proposals in relation to Communications Hub asset charges and maintenance charges. This includes:</p> <p>Monthly Communications Hub Charge HAN Variant Pricing Monthly Maintenance Charge</p>
A20	<p>DCC has the following comments on the proposed approach:</p> <ul style="list-style-type: none"> (i) Monthly Communications Hub Charge <ul style="list-style-type: none"> a. It should be recognised that between Delivery and Installation DCC will not be able to determine whether a Communications Hub is for Domestic or Non-Domestic use. As a result DCC will only be able to apply a single charging principle for the Monthly Communications Hub Charge. DCC proposes that this should be a single ‘blended’ charge across all three regions to meet the First Relevant Policy Objective. This approach is supported by the fact that the majority of Communications Hubs will be for Domestic premises. b. DCC proposes that the calculation of the Monthly Communications Hub Charge between Delivery and Installation should be based on a monthly snapshot of the number of Communications Hubs with an appropriate status in the Smart Metering Inventory. DCC proposes that this snapshot is taken at the beginning of the month. The choice of timing of the

	<p>snapshot reflects the timing of charges to DCC from the CSPs. This approach meets part (d) of the Second Relevant Policy Objective to reflect costs incurred and to minimise the cost of implementation of the Charging Methodology.</p> <ul style="list-style-type: none"> c. Following Installation it will be possible to differentiate between Communications Hubs in Domestic or Non-Domestic premises. Therefore DCC will set differential Explicit Charges for each region for the Monthly Communications Hub Charge. d. DCC proposes that the calculation of the Monthly Communications Hub Charge following Installation is based on a monthly snapshot. DCC proposes that the same snapshot is used as for the period prior to Installation (i.e. at the beginning of the month). DCC will therefore define installed Smart Metering Systems as those with a Smart Metering Inventory status on the date of the snapshot as either (A) 'Installed not Commissioned' or (B) 'Commissioned'. e. Paragraph 319 suggests that the Monthly Communications Hub Charge would apply until the Communications Hub has been removed or the asset cost has been paid off. DCC believes that the asset cost should continue to be smeared across all enrolled Smart Metering Systems. This would support part (a) of the Second Relevant Policy Objective as this approach would avoid there being any differential costs incurred by the receiving supplier between a customer with a recently installed Communications Hub or one installed 10 years previously. This approach would also be simpler to implement by DCC. <p>(ii) HAN Variant Pricing</p> <ul style="list-style-type: none"> a. DCC agrees with splitting out the HAN variant charge, however this is subject to understanding the size of the differential cost to DCC of the HAN variant Communications Hub. If this differential cost is relatively low, DCC believes that this differential cost should be applied as a one time Explicit Charge to the Supplier on Delivery of the variant Communications Hub. b. As outlined in (i) a. above, DCC will not be able to ascertain on delivery whether a Communications Hub will be for Domestic or Non-Domestic use. As such DCC proposes that this one time Explicit Charge is standardised for all three regions. <p>(iii) Monthly Maintenance Charge</p> <ul style="list-style-type: none"> a. As outlined in (i) above, DCC proposes that the Monthly Maintenance Charge is applied based on a snapshot within the month of enrolled Smart Metering Systems. DCC proposes that this is the beginning of the month to remain consistent with the Monthly Communications Hub Charge. DCC will therefore apply the Monthly Maintenance Charge to those Smart Metering Systems with a Smart Metering Inventory status on the date of the snapshot as 'Commissioned'. b. For Non-Domestic Smart Metering Systems DCC proposes separate Explicit Charges for each region.
Q21	<p>Views are invited on the proposals in relation to charges following removal of a Communications Hub. In particular, views are invited on the proposals for no fault removals in split fuel households. Do you agree that any outstanding asset costs should be smeared across all users rather than being charged to the installing or removing Supplier when Communications Hubs that do not serve the second installer's equipment are removed from split fuel households? Please provide a rationale for your views.</p>
A21	<p>DCC has the following comments on the proposed approach:</p> <ul style="list-style-type: none"> (i) For Exception 1 (paragraph 341) DCC would anticipate this being applied as

- an Explicit Charge to all Non-Domestic Smart Metering Systems (as opposed to trying to include this within the Monthly Fixed Charge).
- (ii) For Exception 2 (paragraph 346) DCC would anticipate this being applied as an Explicit Charge and smeared across commissioned Smart Metering Systems (rather than Communications Hub Functions) as other smeared charges are proposed to be allocated based on Smart Metering Systems.
 - (iii) Paragraphs 354 and 356 both refer to 'successfully installed Communications Hubs'. DCC is not clear whether this is intended to reflect those Communications Hubs notified as installed by a Service Request in an Install and Leave scenario, plus those immediately commissioned on installation, or only those commissioned on installation. DCC proposes that it is based only on those commissioned.
 - (iv) It would be useful to limit the definition of faults in this scenario to those faults that actually require a site visit, as approved by DCC on the DCC Service Management System (i.e. so that Suppliers can not undertake a visit without the DCC having the opportunity to resolve an Incident remotely).

Other comments

- a)
- It is the view of DCC that there is some ambiguity in SEC Condition M10.4 regarding the deemed receipt of notices and communications sent by fax or email. It would appear that in both cases in order for the communication to be deemed as received, a successfully sent fax or email must be followed up by a copy of the notice being sent by personal or courier delivery or by first class prepaid post.
- DCC proposes replacing M10.4 (c) and M10.4 (d) with the following:
- (c) if sent by fax, upon production by the sender's equipment of a transmission report indicating that the fax was sent to the fax number of the recipient in full without error and if an error is reported the sender shall re-send the notice by an alternative means in accordance with Section M10.4 within 1 Working Day after the fax is sent; and
- (d) if sent by email, one hour after being sent, unless an error message is received by the sender in respect of that email before that hour has elapsed in which case the sender shall re-send the notice by an alternative means in accordance with Section M10.4-within 1 Working Day after the email is sent.