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Smart Metering Implementation Programme  
Regulation Team  
Department of Energy and Climate Change  
Orchard 3, Lower Ground Floor  
1 Victoria Street  
LONDON  
SW1H 0ET

29 November 2013

Dear Sirs

**Smart Metering Implementation Programme:  
Consultation on New Smart Energy Code Content (Stage 2)**

Thank you for the opportunity to respond to the Smart Metering Implementation Programme ("SMIP") consultation in respect of the Smart Energy Code ("the SEC"). We have set out below the key points of our response, and the Appendix to this letter provides detailed responses to specific questions as set out in the consultation document.

Xoserve is not an entity regulated by Licence, nor is it a signatory to any GB energy industry Codes. We have, however, been appointed by the principal Gas Transporters ("the GTs") as their Central Agent, with responsibility for discharging the GTs' Licence and Uniform Network Code obligations in respect of transportation transactional services. We refer to these regulated services collectively as "Agency Services". In addition, we are expecting that the GTs and the independent Gas Transporters ("the iGTs") will formally nominate Xoserve as their Registration Data Provider ("RDP") under the SEC.

**Summary**

Our response is concerned with the proposed SEC text in respect of Registration Data, including the provision of data refreshes, with the need for clarification in respect of the appointment of a GT Agent who would act as a DCC Service User, and with the effectiveness of certain aspects of the Self-Service interface provisions. Our comments seek to ensure an appropriate level of integration with existing gas industry arrangements so as to deliver effective and efficient processes as the Smart Metering market is implemented.

## **Next Steps**

We are continuing to participate extensively in a number of the SMIP design bodies within the SMIP Transition Governance Framework, including the Registration Data Provider Forum, in order to ensure that we understand fully the requirements on Xoserve in its future capacity as an RDP, and have in place a planned systems change programme that will ensure the on time delivery of robust solutions to support the establishment and operation of the DCC. We are also continuing to engage with the DCC and other stakeholders to work through the practical implications of the Service Management and Incident Management arrangements as set out in the SEC.

We are keen to continue to support the SMIP as it moves forward, and would be happy to meet with members of the DECC Smart Metering Team to discuss in more depth any of the matters raised in our response.

We are happy for you to publish this letter and the supporting Appendix. If you would like to discuss further any aspect of our response, please contact

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Yours faithfully

**SMART METERING IMPLEMENTATION PROGRAMME  
CONSULTATION ON NEW SMART ENERGY CODE CONTENT (STAGE 2)**

**APPENDIX: DETAILED RESPONSES TO QUESTIONS**

**Question 2:** Do you agree with our proposed text for the SEC with respect to Registration Data? Please provide a rationale for your views.

**Question 4:** 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?

We broadly support the proposed text for the SEC with respect to Registration Data, although we would welcome clarification on a small number of associated matters that have arisen during industry discussions in the period since the publication of the consultation, namely:

- a) The nature of any commercial relationship that might exist between the DCC and RDPs;
- b) Terms and conditions relating to the installation and use by the RDPs of communications equipment; and
- c) The purposes for which the DCC would be able to use data provided by the RDPs.

We would like to comment in particular on the requirements of paragraph E2.9 that is concerned with the provision of data refreshes to the DCC by RDPs.

We support the principle that the SEC should provide the DCC and RDPs with certainty of the timescales for the provision of data refreshes, and agree that timescales should be defined by reference to calendar days, recognising that this is appropriate to a business that will be operating and running processes on every day of the week.

However, we consider that a requirement in SEC to provide a data refresh to the DCC within two calendar days would be unduly onerous on the RDPs. For Xoserve, there is a risk that the demand on system resources for carrying out a full data refresh for approximately 23 million Supply Points would have an adverse impact on the timely completion of other industry critical processes that we operate in support of the delivery of Agency Services, and on the timely implementation of changes in functionality in support of future changes to the UNC.

We would propose that a more appropriate target timescale for the provision of a data refresh should be five calendar days, and that this should be kept under review by both the DCC and the RDPs in light of actual experience in response to refresh requests and as the systems capabilities of individual parties evolve over time. We note that the DCC would incur penalties in the event that it made excessive use of the data refresh facility.

**Question 5:** Do you agree with our proposed text for the SEC with respect to the DCC User Gateway? Please provide a rationale for your views.

**Question 6:** 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.

We are concerned that the proposed text for the SEC with respect to the DCC User Gateway does not make specific provision for the GTs to appoint an Agent who would be a recognised DCC Service User with the ability to connect to the DCC User Gateway and to request and receive DCC User Gateway Services. Whilst we have not identified any provisions in the proposed text that would appear to bar the appointment of GT Agent with defined rights and responsibilities in respect of the DCC User Gateway and DCC User Gateway Services, we would welcome an amendment to the SEC that would bring clarity to such an arrangement, including the nature of any commercial relationship that might exist between the DCC and the GT Agent.

**Question 8:** Do you agree with our proposed text for the SEC with respect to the Enrolment in the Smart Metering Inventory and other associated processes? Please provide a rationale for your views.

There is a risk that the uncertainties in respect of the GT Agent role that we have outlined in our response to Question 5 and 6 would impact adversely on our ability to contribute to the establishment and maintenance of the Smart Metering Inventory as discussed in Section 5.4 of the consultation document.

The proposed new SEC provisions in respect of Enrolment in the Smart Metering Inventory include post-commissioning obligations in respect of the validation and maintenance of Security Credentials and re-generation of Private Keys (paragraph H5.27 refers). We anticipate that Xoserve could have an important role to play in these activities on behalf of the GTs, and would welcome greater clarification of security requirements, noting that this aspect of the SEC has been identified for inclusion in a future consultation.

**Question 12:** Do you agree with our proposed text for the SEC with respect to the Self-Service Interface? Please provide a rationale for your views.

We broadly support the proposed text for the SEC with respect to the Self-Service Interface. However, we would like DECC to be aware that the data items held on the GT Supply Point Register that is maintained by Xoserve do not currently include UPRN data, potentially limiting the effectiveness of the provisions in paragraphs H8.15(a)(iv) of the SEC.

UNC Modification Proposal 468 was raised in October 2013 and, if implemented, will require the GTs to include UPRN data in the Supply Point Register, thereby making it available for transfer to the DCC by Xoserve. Similarly, iGT UNC Modification Proposal 056 was also raised in October 2013 and, if implemented, will require the iGTs to include UPRN data within the scope of the Supply Point data that they make available to Xoserve, which can then in turn be made available by Xoserve to the DCC.