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| Q1 | Do you agree with the requirement for the DCC to consult SEC Parties on future tranches of Communications Hubs procurement? Yes we agree with the future consultation of any tranches, however completely disagree with the core logistical need for this. We are also concerned that the hubs being used by DCC will not be able to cope with the immediate roll out of SMETS (such as no roaming sim capabilities) and being able to consult and feed in to future tranches is a necessity to ensure suppliers get what is needed should the hubs not meet requirements. We would question why DCC need to be involved in the procurement of HUBs. The obligation should be on the supplier to procure HUBs that meet SMETS thereby allowing some level of competition. |
| Q2 | Do you agree with the proposed approach to allow SEC Parties (which will include MOPs) to forecast, order, take delivery and return uninstalled Communications Hubs? We agree. The supplier should be able to determine what is ordered, delivered and returned as they are the people who manage the customer and the installations however we would take this one step further and again state that DCC should not be involved in HUB procurement. This will only unnecessarily complicate the supply chain which therefore increases cost to suppliers and further down the line a cost to consumers.<br>It should also be possible for people to purchase hubs without having a supplier already attached. Both of these changes would allow some competition (which seems to be lacking from every other part of these documents). |

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| Q3 | Do you agree with the proposed approach and legal drafting in relation to the development of the Communications Hub Support Materials? Following on from our answers to Q1/Q2 we would disagree that this is even necessary as we believe this is fundamentally the wrong decision. Procurement of HUBs should sit with the suppliers and not DCC. |

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| Q4 | Do you agree with the proposed approach and legal drafting in relation to forecasting of Communications Hubs? We completely disagree with the drafting due to the unneeded complication of logistics. For a document that is stating that 'ordering Communications Hubs should be clear as possible and aim to maximise efficiency', the proposed legal drafting continuously disagrees with this core aim and looks to introduce complexity. |
| Q5 | Do you agree that forecasts that are submitted from the tenth month before a delivery month should include the numbers of Device Models to be delivered in that month in each region, and these should be subject to the specified tolerance thresholds outlined below. Again, this seems to be introducing further unnecessary complexity to the logistics of ordering Hubs. As a small supplier we are able to order our own stock currently and have no issues. There should be no extra difficulties for the DCC to incorporate how suppliers already order stock. The DCC is a supplier of Comms Hubs and the Users are the customer therefore this relationship should not be completely defined by the supplier in this regard. There is also no mention of what will happen if we deviate outside of tolerances? |

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| Q6 | Do you agree with the proposed approach and legal drafting in relation to ordering of Communications Hubs? No. For the reasons mentioned in the previous answers we fundamentally disagree with this proposal. There should be no need for this detail to be included in SEC. DCC need to be flexible to suppliers differing abilities and their current processes that work. The increasing amount of logistics involved from this question and |

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| | previous are leading to additional costs for suppliers. The knock on effect of this on small suppliers requires to be considered.<br>Additionally suppliers should be able to cancel orders within reasonable contract terms that for ease would be similar to supplier's current contracts that they have with meter manufacturers. Again, the question of why are we moving so far from existing arrangements needs to be looked at. |

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| Q7 | Do you agree with the proposed approach and legal drafting in relation to delivery and handover of Communications Hubs? No – there is too much regulation and not enough flexibility for the supplier to determine how they want to run their own business and installations. This is crucial to having a free market which ultimately leads to better outcome for the end consumer. Unless the end goal here is to re-nationalise the energy industry many of these steps provided thus far in the consultation are counterproductive to improving the industry as a whole. |

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| Q8 | Do you agree with the proposed approach and legal drafting in relation to installation and maintenance of Communications Hubs? We disagree with the proposal for a supplier to have a reliance on DCC to complete any install. Install should be wholly supplier's responsibility. Again this feeds into previous answers given as part of this consultation. Also where a supplier is unable to commission a Comms Hub due to no WAN being established during that time this should be circumnavigated with the use of a No WAN install UTRN. This allows for a far smoother customer experience, reduces cost on DCC and allows the meter time to establish WAN later without the need for overly complex solutions to remedy the issue. As a supplier that is already rolling out SMETS1 on mass our experience suggests that this will be a larger than expected and should be considered in more detail now. |

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| Q9 | Do you agree with the proposed approach and legal drafting in relation to removal and returns of Communications Hubs? No. The detailed requirements state that 'costs involved are going to be difficult to calculate due to the 'DCC's supply chain complexity.' This explicitly underlines the main failing of SEC 4. The unneeded complexity of supply chain is only going to increase costs across the board.<br>This drafting also suggests that there could be an unknown amount of times the DCC would order a supplier to remove kit from premises at no fault of the supplier. This will cause added expense to the suppliers which smaller suppliers are unable to absorb in the way Big 6 can.<br>We believe that suppliers should be able to return no fault Comms Hubs before installation as small suppliers may struggle to correctly store large quantities of stock if they have over forecast the amount they required. |
| Q10 | Do you agree that there should be an obligation for the first installing supplier in a dual fuel premises to take all reasonable steps to install a communications Hubs that would work with both the smart meter that it is installing and the smart meter of the other fuel type? No. The previous supplier cannot have obligation to ensure that any supplier that may take a supply on has the correct equipment in place for their meter. This is the responsibility of the gaining supplier. |

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| Q11 | Do you agree with the Governments proposals in relation to the processes to determine the reasons for early return of Communications Hubs? No. Further unneeded logistics. Experienced meter operators will remove Hubs as faulty and supply a reason for doing so currently. If the fault requires for the HUB to be removed at site and it rectifies itself before it reaches the DCC this may mean the suppliers are incorrectly penalised for returning a 'non-faulty' Hub. This may lead to the need for suppliers to check the returned faulty meters before sending due to potential charges. Further unnecessary cost and complexity. |

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| Q12 | Do you agree with the proposed approach and legal drafting in relation to the transitional requirements for Communications Hubs forecasts and orders? We agree with this however we believe that it should be taken into consideration that for a small supplier to forecast this accurately. This is to ensure that growth and therefore competition is not penalised due to a over/under forecast by a supplier. |

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| Q13 | Question: do you agree with our proposed changes to the DCC licence to require the DCC to offer services to non-SEC Parties where required to do so under the SEC? We agree as long as non-SEC parties would be required to pay the same base level costs that SEC parties must. |

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| Q14 | Do you agree with the proposed approach and legal drafting in relation to the provision of Communications Hubs for testing?Yes |

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| Q15 | Do you agree with the **legal drafting** in relation to Security Governance? Yes |

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| QX | Do you agree with the Governments proposals in relation to Security Assurance? In particular on:<br>• the proposal for the SEC Panel to procure a central CIO on an initial basis;-We are concerned by monopolisation of every aspect of the smart metering roll out. We would disagree that decisions being taken on suppliers behalf and all being governed centrally lead to a healthy competitive market place.<br>• the proposal for Users to meet the costs of security assessments that are undertaken at their organisation; Again concerned that the centrally procured CIO is leading to an unhealthy position for costs. We are aware of the potential benefits of a monopoly however there are clear disadvantages that may well lead to a position where the service is poor, prices are high and no ability for users to choose a different organisation to complete the security audits. The benefits of a free and competitive market must be greater and would lead to small supplier being able to ensure costs stay down. This would also then be each suppliers own responsibility.<br>• the proposal for a three year rolling cycle of security assessments to be used to provide assurance on Users; We agree that for the first 3 years a yearly assessment is sensible. We would urge that during these first few years that some leniency is allowed |

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| | as it should be used as an opportunity to help suppliers to implement the correct processes where necessary and not penalise unnecessarily.<br>• the process for identifying and managing non-compliance-We would like more information on what the consequences of an Event of Default would be in this context.<br>• the assessment arrangements proposed for DCC. We agree that DCC need to undergo assessments and these should be more stringent than anything that suppliers undergo as the DCC underpin the security of all smart meters. |

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| Q16 | Do you agree with our proposed approach and legal text for SEC in relation to Privacy Assessments? We disagree for the need to explicitly obtain consent form the customer. Would we be able to do this as part of the consumer's contract which they could opt in or out of? We would like more clarity on what is meant by 'Explicit Consent'.<br>Equally we agree that the customer should be able to later opt out however to continuously remind the customer that they may opt out will surely only raise suspicions toward smart meters. Being continually reminded they can opt out will mean the customer will begin to think about what issues there could potentially be and this will only lead to lessening the positive impact of smart metering.<br>We agree with the need of assessments but would repeat all of our previous concerns regarding security audits. Our concern that there is belief within this document that having a monopoly completing the assessments would lead to 'increased quality and consistency,' and 'help minimise costs'. A monopoly often leads to complacency and increased costs. What protections are being put in place to ensure that his does not happen?<br>We also are worried by the tone of this document that seems to suggest that harsh penalties may be dealt out so early in the smart metering roll out when all suppliers will be looking to learn. |
| Q17 | Do you agree with the specific proposals for undertaking random sample compliance assessments? We are happy to accommodate these as long as a protection is put in place to ensure the cost/time incurred from these is kept to a minimum. For example a number of these per year is defined. |
| Q18 | Do you agree with the proposal for Users to meet the costs of the privacy assessments that are undertaken at their organisation? Further understanding required. |
| Q19 | What are your views on potential future changes to the SEC to provide for reporting the results of privacy assurance assessments bodies such as Ofgem, DECC, ICO and Parties generally? It seems sensible for these to be reported to Ofgem, DECC however what is the need for the results of an audit to be shared with other parties, particularly other suppliers? |

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| Q20 | Do you agree that the proposed legal drafting reflects the position reached in the SMETS2 consultation response, that Users should be required obtain consent and to verify the identity of the energy consumer from whom they have obtained the consent prior to pairing a CAD? Yes we agree that consent should be required to pair any CAD to the meters as this should only be done on customer request. We agree with this being applied to other types of CADs e.g laptops for the same reason. |

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| Q21 | Do you agree with the proposed updates to the Security Requirements and the associated legal drafting? Indifferent |
| Q22 | Do you agree that we should also include in the SEC obligations on the DCC and Users which limit the future dating of commands to 30 days? We believe that restricting the future dated commands to 30days restricts innovation. It will also reduce supplier's ability to ensure readiness for large bulk events such as price change. In these instances it may also mean heavy amounts of traffic on the network as the potential period for sending these commands is reduced. There must be a way of allowing future dated commands without affecting the ability to detect anomalies. |

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| Q23 | Do you agree with the proposed approach and legal drafting in relation to which parties are eligible to subscribe for specific Organisation Certificates? Yes. |

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| Q24 | Do you agree with the proposed approach and legal drafting in relation to the Organisation Certificates the DCC must subscribe for in order to support installation of Devices?Yes |
| Q25 | Do you agree with the proposed approach and legal drafting in relation to the date on which the DCC must start providing live certificates, in particular the proposal to turn off the DCC's response time obligations until the Stage 2 Assurance Report (see section 6.6) has been produced? Yes |

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| Q26 | Do you agree with the proposed approach for all Network Parties to have established SMKI Organisation certificates? Yes |
| Q27 | Do you agree with the proposed approach for Non-User Suppliers to have established SMKI Organisation certificates? This would need to be an extremely easy task for a non-user supplier otherwise being a non-user, which in itself indicates non-readiness, will have too much responsibility placed on it. |
| Q28 | Do you agree with the proposed approach and legal drafting in relation to specific SMKI Organisation Certificates placed on specific Devices? Yes |

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| Q29 | Do you agree with our proposal to require DCC to provide Test Certificates to Test Participants (who, in the case of non-SEC parties, will have to be bound by an agreement entered into with the DCC) only for the purposes of Test Services and testing pursuant to Section T of the SEC, and to not require DCC to provide a Test Repository? Please provide a |

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| | rationale for your view. This is sensible as long as gaining access to test certificates is not an onerous process. |

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| Q30 | Do you agree with the proposed approach and legal drafting in relation to the DCC User Gateway Services Schedule? We believe the use case for UTRNs should be expanded as it is currently in SMETS1. There are many areas where UTRNS would be useful<br>as we believe 'no WAN' to be a reality in the new world. Our current experience of installing SMETS1 meters with roaming sims would suggest the quoted levels of coverage are going to be difficult to achieve. This is not to say the coverage is not there as we know it is as all of our installs are completed via a mobile phone device. This does NOT guarantee WAN coverage to, for example, a meter under the sink. Additionally to this Intermittant WAN is a real issue that can mean meters lose WAN for days and engineer visits to change prices on any meter that is in No WAN really does put us back in the realms of token meters.<br>As a company that has pushed on with an early roll out of pre-payment SMETS1 meters we are happy to share statistics and experience of issues we have faced to ensure DUGIS allows for any and all issues we have come across. In regards to this we are hoping to help make the smart meter roll out better for suppliers and consumers. This is a concern for us as a company. |

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| Q31 | Do you agree with the proposed approach to centrally procure a EUI-64 Registry Entry? We see no issue with this although the need to centrally procure this and build in complexity seems counterproductive to the £500 it would cost for each supplier to procure their own I.D. |

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| Q32 | Do you agree with the intention to create a 'Party ID', enabling access to the Self Service Interface at a Party level? If the Party ID is simply a reflection of the User ID and requires no complex mapping then this seems sensible. |

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| Q33 | Do you agree that the proposed legal drafting accurately reflects the process by which the DCC will provider connection the DCC User Gateway? As the high volume connection will we assume provide a better level of service/speed and the cost is being charged to individual suppliers we would require for the higher volume connection not to be cost prohibitive and therefore give an unfair competitive advantage to larger suppliers who are able to absorb the cost. |
| Q34 | Do you agree that the drafting meets the needs of both DCC and its Users in establishing, maintaining and terminating connections? Please provide a rationale for your views and include any supporting evidence. It is quite straightforward that if a supplier wishes to upgrade from a low volume connection to a high volume connection some cost should be involved. Again this requires to not be cost prohibitive to small suppliers who wish to remain competitive. Without knowing the specified length of time for the agreement is difficult to suggest whether the early termination charge is fair. |

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| Q35 | Do you agree with the proposed approach and legal drafting in relation to Processing Service Requests? Yes we agree that this seems sensible approach. |

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| Q36 | Do you agree with the proposed changes to the approach and legal drafting in relation to Smart Metering Inventory and Enrolment Services? In the situation where there is No WAN at install and the meter is manually added to the Comms Hub and it is set as 'installed not commissioned' we believe there should be the ability to commission the meter with No WAN UTRN. This is due to statistics we have from our installs that suggest No WAN at install is far more prevalent than expected. This would allow the customer to have the correct price set on the meter. This means that the meter is not fully commissioned but the consumer is benefiting from the correct price from the outset allowing for a far smoother customer journey. Other than that we are happy with the approach. |

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| Q37 | Do you agree with the proposed approach and legal drafting in relation to Problem Management? We agree that it makes sense for users to have visibility of any problems identified so that all can prepare correctly until a permanent solution is found. |

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| Q38 | Do you agree with the proposed approach and legal drafting in facilitating provision of a service to consumers to allow them to find out which Users have accessed consumption data from their meters? We need further explanation of what is required as 'explicit consent' to gain access to a consumer's consumption data. We are concerned that this could lessen the positive affect of smart metering. For example if 'explicit consent' is required each and every time we require to gain consumption data then the consumer must wait while we query the meter each time they have an issue and contact their supplier. Depending on the quality of WAN this could substantially lengthen the time it takes to service that consumer. This could be hours or days as intermittent WAN is a real issue to be aware of. If we have instead gained explicit consent at the point of sale for example then the consumer can be serviced in a majority of cases within minutes if not seconds as the data will have been queried at specified times before the consumer issue was raised and gives the supplier far more information at hand to deal with any particular issues and the consumer experience is far more positive regardless of intermittent WAN at that point in time.<br><br>In regards to allowing the suppliers a facility to provide data to consumers of who has historically accessed their data there is one issue we can foresee which is where there is an anomalous User that has accessed the consumers data then the consumer will ask their current supplier why this has occurred. The current supplier will have no way of answering this question and may end up with no resolution for the consumer. An exceptions process would need to be designed which describes the process in how these instances can be resolved. |
| Q39 | Do you agree with the proposed approach of not requiring any User to offer a transparency service to consumers at this stage? We agree this should not be a requirement at this stage |

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| Q40 | Do you agree with the proposal to provide for a date in the SEC when any assessment of whether a supplier is large/ small for testing purposes is made? If not, please provide evidence for why this approach would not work and what alternatives should be used. We agree that setting a date for when suppliers are considered large/small for these purposes does provide clarity and drawing the line in the sand at this stage is acceptable. |

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| Q41 | Do you agree with the proposed approach and legal drafting in relation to registration data text alignment? Yes |

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| Q42 | Do you agree with the proposed approach and legal drafting in relation to provision of market share information to the CDB including Ofgem determining disputes between the CDB and the DCC? This seems sensible and cost effective as DCC already holds this information however there needs to be a clear dispute of market share process as all exceptions must be accounted for. We cannot have a situation where the centralised monopoly has final say over all decisions with no route of escalation. This is true of every process via DCC. |

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| Q43 | Do you agree with the proposed approach to RDP/DCC connections and the associated legal drafting? No comment |
| Q44 | Do you agree that Network Parties using the same RDP should be jointly and severally liable for failure of that RDP to comply with provisions relating to the RDP's use of the connection provided to it by the DCC? No comment |

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| Q45 | Do you agree with the proposed approach and legal drafting in relation to provision of Explicit Charges for Certain Other Enabling Services? Could an estimate of these costs be given? We are concerned that these enabling services that for example ' Parse & Correlate – further assistance for users' will be most useful to smaller suppliers that may not have the technical experts required for this and the costs associated could then be prohibitive to small suppliers. However we do agree that 'second comers' should not get a 'free ride'. |
| Q46 | Do you agree with broadening the scope of DCC Licence Condition 20 to include the Other Enabling Services which attract an explicit charge? We agree this should be expanded so that disputes can be escalated to Ofgem. As stated before this should be duplicated across the board due to the centralised aspect of DCC. |

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| Q47 | Do you agree with the proposed amendments to the legal drafting which introduce a new controlled category of DCC data, set out guidelines for types of data which may be marked as confidential or controlled and limit liability for breach of the latter category? Yes |
| Q48 | Do you agree that liability for disclosure of controlled information should be limited to £1 million per event (or series of events) for direct losses? Yes, as long as this is not the amount that is defaulted to and all punishments are proportionate. |

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| Q49 | Do you think that SEC Parties other than the DCC may have a need to mark data 'controlled'? If so, please outline what, if any, parameters ought to apply? Suppliers should be able to mark as controlled within the same criteria that DCC have but applied to their own company. |
| Q50 | Do you agree that liabilities if these controls are breached should be limited to £1 million (excluding consequential losses)? The liability should be proportionate. |

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| Q51 | Do you agree with the proposed approach and legal drafting in relation to the consequential changes to align the SEC with the proposed changes to the DCC and Supply Licences? Yes it seems sensible to align in all documents. |

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| Q52 | Do you agree with the proposed approach and legal drafting in relation to the invoicing threshold? Yes |
| Q53 | Do you agree with the proposed approach and legal drafting in relation to the credit cover threshold? No comment |
| Q54 | Do you agree with the proposed approach and legal drafting in relation to scope for an explicit charge related to Services within the DCC User Gateway Services Schedule of zero? Yes |

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| Q55 | Do you agree with the proposed amendment to the definition of 'Mandated Smart Metering System'? Views would be welcome whether this change has a material impact. No comment |
| Q56 | Do you agree with the proposed approach and legal drafting regarding power outage alerts? These alerts most definitely need to be reported to suppliers. Further to this all alerts that each supplier wish to be informed of should be provided to suppliers on a real time basis so that they can react to these accordingly. |

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| Q57 | Do you agree with the proposed approach and legal drafting in relation to the testing of shared systems? Yes |

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| Q58 | Do you consider the costs of remote access to the test SMWAN should be socialised across all Users or charged directly to those test participants who use the service? Please provide an explanation for your answer.No comment |

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| Q59 | Do you agree with the proposed legal drafting in relation to Communications Hub Asset and Maintenance Charges? Nothing to add |

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| Q60 | Do you agree with the proposed legal drafting on Communications Hubs Charging following removal and/or return? Nothing to add |

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| Q61 | Do you have any views on the operation of SMETS 2 meters that are opted out of DCC services in light of:<br>• the conclusions on SMKI set out above; and<br>• any other matters, including GBCS, that may affect two-way communications with an opted-out meter?Nothing to add |

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| Q62 | Do you agree with the proposed legal text with respect to the DCC's, Subscriber and Relying Party obligations and associated liabilities? Nothing to add |

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| Q63 | Do you agree with proposed legal text in relation to the Initial Enrolment Project for SMETS1 meters installed during Foundation? Yes. Once more details are received on what is a 'reasonable' process for enrolling all meters it will need further consultation. |
| Q64 | Does the contents list for the Initial Enrolment Project Feasibility Report (para 406) cover the required issues for the DCC to address? Are there any additional areas which you consider the DCC should be specifically required to include? No there is nothing additional to cover. |

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| Q65 | Do you agree with the proposed legal text in relation to charging arrangements for the ongoing communications costs of Foundation Meters enrolled in the DCC? Yes we agree however would like to add to it and state that if a User has established a communication contract that is cheaper than the charge for a SMETS2 meter operated through the CSP communications this should also be reflected in that Users costs. |

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| Q66 | Do you agree with the proposed approach and legal drafting in relation to User supplier to Non-User supplier churn? We agree that non users need an easy and low cost process of partaking in change of supply. If an enrolled SMETS2 meter is flagged up in the national databases so that it can be easily incorporated into existing supplier process then we do not object to that. The portal would require to be an automated service and the process around it needs to be as seamless as possible. Any non-user cannot be expected to perform any onerous task with the DCC. |