



Smart Metering Implementation Programme
Regulation Team
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DECC Consultation on transitional arrangements in the Smart Energy Code

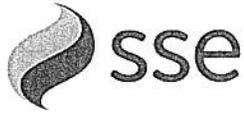
We are pleased to provide comments on the above consultation on behalf of the following licensees:

- SSE Energy Supply Limited
- Southern Electric Gas Limited
- South Wales Electricity Limited
- SWALEC Gas Limited
- Scottish Hydro Electric Power Distribution plc
- Southern Electric Power Distribution plc

We welcome the ongoing engagement with the Smart Metering Implementation Team and have provided answers to the specific questions posed by DECC in the attached annex.

Please call me if you have any questions.

Yours sincerely,



Annex 1 – SSE response to consultation on transitional arrangements in the Smart Energy Code

1. Do you agree with the proposed transitional measures to support Communications Hubs forecasting for an interim period?

In particular:

- Do you agree that the proposal to submit forecasts via email for an interim period (until June 2015) is acceptable?
- Do you agree that the DCC should provide certain WAN information via spreadsheet (CSV format) in advance of the full WAN information being available in June 2015?

If you do not agree, please explain your rationale.

As a Supplier, whilst we are disappointed that the CH Ordering System will not be available in January 2015, we agree that the proposed Interim Communications Hubs forecasting process seems a reasonable and pragmatic approach. We seek clarification on the ongoing approach to update SEC Parties on the progress and implementation of the enduring arrangements for the CH Ordering System, and an assured plan for moving from the interim to enduring for future submissions of CH forecasting.

We fully support the provision of the full extent of WAN information that is available from the DCC, in advance of the full WAN coverage checker being provided in June 2015.

We seek further clarification on the formatting of the proposed CSV file in relation to:

- Size of the file and number of entries
- Structure of the file, such that there can be efficient analysis of data through use of pivot tables

On the basis of the interim WAN coverage information that has been proposed, we have concerns regarding the tolerance levels set out in SEC for the initial forecasts. In particular, that by not receiving information on the use of a particular WAN variant or issues in relation to specific geographical areas, there is a risk that a forecast may be submitted that is not accurate with the thresholds set out.

We propose that consideration should be given to an associated review of the threshold levels that are applicable for the interim period. This could consider that only the upper limit applies during this interim period. Alternatively, consideration could be given to whether there should even be identification of WAN variants during this phase.



2. Do you agree with the proposed transitional measures to support transitional service management for those services that the DCC will be offering prior to the commencement of its full service management arrangements?
If you do not agree, please explain your rationale.

We are in general agreement that there needs to be transitional measures for service management. As a Supplier and Registration Data Provider, we seek further clarification on specific elements to ensure that the interim process is as robust as possible.

Comments relating to paragraph 29 in the Condoc:

In bullet point 2, we suggest that Parties provide at least one authorised and agreed representatives with alternative(s), to ensure that timely action of updates can be managed.

In bullet point 4, we seek clarification on the channel to raise and send incidents to DCC. We infer from the information set out, that this will be via email and in this event, we suggest that this is achieved with the use of standardised templates.

In bullet point 5, we recommend that the prioritisation criteria needs to be defined in conjunction with SEC Parties, and published by the DCC. This ensures that there are transparent processes and Parties can determine whether the prioritisation applied is appropriate to the incident. Further, and in respect of bullet point 4, we would suggest that SEC Parties should have the right to assign an indicative priority to an incident when it is being raised.

In bullet point 9, with regard to the 3 days notification of an incident being resolved, we would suggest that this should be manageable within one working day by DCC. We seek clarification that the reference to user(s) will be inclusive of Registration Data Providers.

3. Do you agree that the DCC Licence and SEC should be modified so that updated versions of SEC subsidiary documents may be re-designated by the Secretary of State and incorporated into the SEC?
If you do not agree, please explain your rationale.

We are unclear on the rationale for this approach, rather than ensuring the SEC Modification Process has application to the SMETS and CHTS once designated. We would seek for this to be re-assessed following evaluation on the DCC Re-planning Consultation and the implications for transitional arrangements.

We seek clarification on the date of implementation, and we ask that this be reconsidered. We suggest that this should be a reference to a specific milestone, with an applicable implementation duration added to this milestone date.