

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

30 December 2014

Dear Sirs

SEC Stage 4 Consultation on additional SEC content

Thank you for the invitation to respond to the above document. Good Energy is a fast-growing 100% renewable electricity supply company, offering value for money and award-winning customer service. An AIM-listed PLC, and founder member of the Social Stock Exchange, our mission is to support change in the energy market, address climate change and boost energy security. Good Energy matches over the course of a year all the electricity its customers use with power from renewable sources. For the last three years, Good Energy has topped the Which? energy company customer satisfaction survey.

For your ease, we reference the specific questions within the consultation to which we have responded.

Q1: Do you agree with the proposed approach and legal drafting in relation to Infrastructure Key Infrastructure?

Good Energy agrees with the proposed approach.

Q2: Do you agree with the proposed approach and legal drafting in relation to DCC Key Infrastructure?

The proposed approach seems reasonable.

Q3: Do you agree with the proposed approach and legal drafting in relation to allowing RDPs to become Authorised Subscribers for Organisation Certificates?

Good Energy agrees with the proposal.

Q4: Do you agree with the proposed approach and legal drafting in relation to the checks the DCC must apply when deciding if a Subscriber is an Eligible Subscriber?

Good Energy agrees with the proposal.

Q5: Do you agree with the proposed approach and legal drafting in relation to the size restrictions on a number of fields in Device and Organisation Certificates?

Good Energy agrees with the proposal.

Q6 Do you agree with the proposed approach and legal drafting in relation to the clarified Independent SMKI Assurance Scheme?

Good Energy agrees with the proposal.

Q7: Do you agree that the proposed changes are necessary and proportionate to protect DCC Systems?

The proposed changes seem necessary and proportionate.

Q8: Do you agree with the proposed changes to the post commissioning obligations and associated limitation of liabilities?

Good Energy agrees with the proposed changes to post commissioning obligations.

Q9: At what point should the Recovery Key on a meter be validated?

Good Energy is of the opinion that the Recovery Key should be validated as soon as the meter is commissioned and prior to it being configured.

Q10: Do you agree with the proposal to move four sections of the SEC (H4, H5, H6 and O3) from the SEC into SEC subsidiary documents, and the proposed changes to the legal drafting accommodate this?

The proposal to move sections H4, H5, H6 and O3 into SEC subsidiary documents seems reasonable.

Q11: Do you agree with the proposed approach to amending the legal drafting to provide for the Secretary of State to direct that an activity is required to be carried out in advance of a specified date instead of a milestone?

Good Energy agrees that this is a valid approach in certain circumstances; however, where dependencies exist, the milestone approach remains valid.

Q12: Do you agree with the approach and proposed legal drafting supporting Parties undertaking tests equivalent to UEPT and SREPT on their own account?

Good Energy agrees with the approach supporting Parties undertaking tests equivalent to UEPT and SREP on their own account.

Q13: Based on our understanding of the DCC's remote testing offering, it may be that a DCC Gateway Connection is required, which would mean that remote testing would only be available to SEC Parties. We welcome views from prospective testing participants on the impact this may have on their plans.

While Good Energy's plans for testing are not finalised, Good Energy is of the opinion that DCC Gateway connectivity in support of testing is perfectly reasonable (whether direct or through a service provider) and that such provisions should be planned by all parties seeking to test their interaction with the DCC. Ensuring that Gateway costs are minimised (e.g. enabling support for test and live operations through the same physical DCC Gateway components) will be important in encouraging the right behaviours of testing participants.

Kind regards,