

## Consultation on New Smart Energy Code Content (Stage 4a) **Response from Siemens**

## **Statement of Interest**

We welcome the latest consultation response on the Smart Energy Code and are pleased to see the extension of the code to address many of the developing areas associated with Smart Metering communications. Siemens expects to operate across a number of different aspects relating to Smart Metering, so it is important to have early clarity on the enduring operational environment.

We have a long standing operation providing managed services to Energy Suppliers and so welcome the recognition of Managed Service Providers. We firmly believe that many SEC parties will not be able leverage Smart Metering communications without the use of shared services.

We look forward to on-going collaboration with all parties in the coming months.

## Questions and Answers

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

We agree

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

We agree

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

We have no comment

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?

We agree

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?

We have no comment

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

We have no comment

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

We partially agree. Whilst we would expect that the outgoing supplier ensures that the metering equipment is fully functional and verified at the point of churn, there must be a "reasonableness" test on any incurred costs. We would expect the SEC Panel to arbitrate on this matter.

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

We would suggest that the wording is such that the Recovery Key is validated on or before the end of the seven day period. This allows flexibility in how this is implemented. We would also like clarity on the evidence required to demonstrate that this check is complete.

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?

We have no comment

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?

We agree

Q12 Do you agree with the approach and proposed legal drafting?

We agree.

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.

We agree with the proposal that parties wishing to utilize DCC test systems should accede to SEC. Given that testing will require access to sensitive systems and information this step provides appropriate safeguards which are by their nature aligned to existing policies and principles. In practice it is our understanding that many of the organisations looking to undertake testing as described in the consultation document are already SEC members so any increased burden on the industry is minimal. Siemens will be providing such services to other SEC parties and we can confirm that as we are already a SEC member this requirement will have no effect on our plans.

**For any questions or further information on Siemens response to this consultation please contact:**

### **About Siemens in the UK**

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