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Smart Metering Implementation Programme - Regulation
Department of Energy & Climate Change
Orchard 3, Lower Ground Floor
1 Victoria Street
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23rd February 2015

Dear Sir / Madam,

British Gas response to DECC's consultation on "New Smart Energy Content – January 2015" (URN 15D/014)

Thank you for the opportunity to respond to this consultation on new Smart Energy Code (SEC) content.

We are in broad agreement with the principles of the proposals set out in this consultation but have highlighted a small number of concerns in our responses to the consultation questions which we would be happy to discuss with you further.

Most notably, we believe further clarity is required over the governance of informal testing and the intended use of the Enduring Test Approach Document (ETAD). The DCC are not required to produce the ETAD until after the informal testing phase has commenced and these proposals do not create any formal governance to resolve this. Whilst we accept that informal testing may not warrant the same governance rigour as the other testing phases, test participants will need to understand, well in advance, any requirements that might be placed upon them for informal testing.

We believe this matter, and a few other minor issues, require further consideration and would welcome a discussion with DECC about this.

Our detailed responses to DECC's questions are attached in the Appendix. Please do not
hesitate to
further detail on our response. if you require any

Yours sincerely

(by email)

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Question 1. Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing? Please provide a rationale for your response?

- 1.1 Yes, we support the proposal to introduce legal text that will allow for the Secretary of State (SoS) to request the DCC to issue a revised commencement date for any of the testing phases.
- 1.2 Whilst we believe the proposed legal text delivers the intent of this proposal we do not believe it makes it very clear. The proposed text, for each testing phase, follows on from the existing SEC provision that allows the SoS to shorten a notice period. This therefore appears to link the two provisions which we do not believe is the intent of this proposal.
- 1.3 We would therefore suggest that the legal text is amended, and possibly separated from the existing SoS provision, to make it clear that the SoS can direct the DCC to issue a new start date under circumstances such as the DCC re-plan.

Question 2. Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views.

- a) Whether you agree with the strength of the obligation on DCC to offer the service.
 - b) Whether you agree that DCC can determine the detailed rules to apply to use of the service.
- 2.1. We are satisfied that an all reasonable steps obligation should be sufficient for the provision of informal testing services from the DCC. However, we do not believe that the DCC is as reliant on third party manufacturers for the provision of informal testing as suggested in the consultation document. The GBCS interface testing facility will simply be a tool that can be developed to send and receive GBCS commands without prototype meters. Communication Hubs may well be involved in informal testing but, via the CSPs, those manufacturers are DCC service providers and therefore should not be an issue.
 - 2.2. It is unclear from the proposals whether informal testing will exist in the enduring phase. Our understanding is that informal testing will be required and offered in the

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- enduring phase and therefore enduring governance provisions will be required. Whilst these transitional proposals amend the enduring requirements within Section H this will only be possible during the transitional phase. We would therefore suggest that, maybe at a later date, enduring provision and obligations for informal testing will need to be produced.
- 2.3. We are concerned that the Enduring Test Approach Document (ETAD) will be used for Informal Testing provisions. It is acknowledged in the consultation document that the ETAD will not be produced and approved in time to be used for informal testing. A 'first version' of ETAD has been referred to in the consultation document but there is no associated obligation on the DCC to produce this in a suitable timescale or any proposed governance arrangements for it.
- 2.4. We would hope that the DCC would produce any detailed rules for informal testing in consultation with users at an appropriate forum (e.g. TDEG). We do not believe it is in the DCC's interest to place onerous or unachievable requirements on to users for informal testing. However, with uncertainties on the timing and governance of ETAD it would seem more sensible for the DCC to produce a separate test approach document specifically for informal testing and seek agreement on its content via TDEG members. Any enduring elements of the informal testing regime that will remain and be required in the ETAD could be developed in parallel.

Question 3. Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction? Please provide a rationale for your views?

- 3.1. We are broadly supportive of the text within the direction. However, please see our comments in our response to question 2 in relation to the use of ETAD for informal testing.

Question 4. Do you agree with our proposals and legal text in relation to the DCCKI PMA Function? Please provide a rationale for your response?

- 4.1 Yes, we agree with the proposals and legal text in relation to the DCCKI PMA Function.
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Question 5. Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State? Please provide a rationale for your response?

- 5.1. Yes, we agree with the proposal that any such modification should be directed to the SoS. We would also suggest that the DCCKI PMA should be required to notify the PMA, for information purposes only, of any such proposed modification.

Question 6. Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?

- 6.1. Yes, we agree that the first forecasts of communications hubs orders should be aligned with those for subsequent forecast and therefore be submitted 10 months in advance of the relevant delivery month.

Question 7. Do you agree with the consequential changes we are proposing to electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation?

- 7.1. Yes, we agree that the proposed changes to both the gas and electricity supply licences are appropriate.
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