

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

17 February 2015

Dear Sirs

A Consultation on New Smart Energy Code Content – January 2015

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. Good Energy has consistently been ranked first or second in Which? energy company customer satisfaction surveys in each of the past four years.

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

Q1: 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.

Good Energy agrees with the proposal; this will provide necessary flexibility and ensure that plans are reflective of reality.

Q2: 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.

Good Energy agrees with the proposed provisions for informal testing in the SEC.

The proposals seem pragmatic both in terms of the strength of obligation on DCC and enabling the DCC to establish the detailed rules. However, it may make sense to further strengthen the obligation to ensure that the detailed rules do not present unnecessary / unreasonable barriers to participating in informal testing.

Q3: Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction?

Good Energy agrees with the proposed SEC amendments for informal testing as set out in the letter of direction.

Q4: Do you agree with our proposals and legal text in relation to the DCCKI PMA Function?

Good Energy agrees with the proposals in relation to the DCCKI PMA function.

Q5: 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?

Good Energy agrees that while the programme is in transition that any proposed modification to the SEC, related to DCCKI and security, should be directed to the Secretary of State.

Q6: 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?

Good Energy remains of the opinion set out in its response to the original question in the SEC Stage 4 Consultation; "Good Energy understands the reasons why forecasts must be refined during the lead-up to a delivery; however, 10 months is excessive; 6 months would be more appropriate."

Q7: 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?

Good Energy is unsupportive of any changes that further increase the reporting burdens on energy suppliers unless absolutely necessary.

Good Energy questions the materiality of the exceptions when compared to the additional burden and increased complexity of reporting requirements.

I hope you find these answers useful, should you require further clarification do not hesitate to contact me.

Kind regards,