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Smart Metering Implementation Programme –  
Product Delivery  
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# **Smart Metering Implementation Programme – A Consultation on New Smart Energy Code Content and Related Supply Licence Amendments**

Thank you for the opportunity to comment on your further thinking on the development of the Smart Energy Code.

In relation to your questions:

<b>DCC Enrolment Mandate – Chapter 3</b>		
Q1	Do you agree with the legal drafting of the proposed amendment to the electricity and gas supply licence conditions? Please provide a rationale for your views.	Agree. Requiring Suppliers to take all reasonable steps to commission SMETS2 meters will drive the interoperability of the market and help ensure that maximum costs and consumer benefits can be realised.
Q2	Do you agree that this legal duty should take effect when DCC's enrolment services are first available? Please provide rationale for your views.	Agree. As above
<b>DCC Enrolment and Communication Services – Chapter 4</b>		
Q3	Do you have any comments on the proposed drafting in these new subsidiary documents?	No comments
Q4	Do you have any specific comments on the proposed revised approach to dealing with Post-Commissioning Obligations including the proposal to delete Sections M2.7 and M2.8?	No comments
<b>Consent for joining and un-joining Consumer Access Devices – Chapter 4</b>		
Q5	Do you have any comments on the proposed approach?	No comments – not relevant to Network Operator role
<b>Consequential Changes to Sections F2, G, M2 and A – Chapter 4</b>		
Q6	Do you have any comments on the proposed drafting changes to Sections F2, G, M2 and A?	No comments
Q7	Do you agree with the proposal to move some of the technical details in F2 into a subsidiary document in line with the approach taken in relation to Sections H4.5	Agree

	&6?	
<b>SEC amendments to support Smart Metering Testing – Chapter 5</b>		
Q8	Do you support the proposed changes to Section T to ensure that the testing objectives reflect a more up to date version of the SEC?	Yes
Q9	Do you agree with the proposal that the DCC should offer a testing service for prospective Non-Gateway Suppliers?	Agree
Q10	Do you intend to test only Devices (and not User Systems) against the DCC Systems? If so, how and when do you intend to do this? Is it your intention to: become a SEC Party and establish a DCC Gateway Connection; rely on other parties to interact with the DCC for the purposes of testing Devices; or another means (e.g. direct connection without being a SEC Party)?	<p>We will test Devices and User Systems against the DCC systems in order to ensure that the systems we are procuring from our service providers are fully compliant with DCC process/specifications and to ensure our operational readiness for the commencement of 'DCC Live' or as soon thereafter as is possible. It is our intention to test against DCC systems such that we are ready for 'DCC Live' however it is not possible to give definitive dates at this time as our procurement of our User Systems is not complete and as such are still subject to OJEU regulations.</p> <p>As Network Operator we are already a SEC party and we will establish a gateway connection as is required.</p>
<b>Public Key Infrastructure – Chapter 6</b>		
Q11	Do you agree with the proposals, and associated legal drafting in relation to the SMKI Recovery Procedure Guidance document? Please provide a rationale for your view.	Agree. The drafting provides the flexibility for the SMKI PMA to make a decision on how to proceed in the event of a compromise of probate keys taking into account the appropriate factors of time, cost and impact on affected parties.
Q12	Do you agree with the proposed drafting on how changes to the SMKI Recovery Key Guidance are managed, or do you think it should be a SEC Subsidiary Document and open to the SEC modification process? Please provide a rationale for your response.	Agree. The document is a guidance document only. The changes to SEC impose a requirement for the SMKI PMA to consult DCC, the security Subcommittee and Parties upon any amendments; ensuring the view of all participants are appropriately considered.
Q13	Do you agree with the proposals, and associated legal drafting in relation to the SMKI Recovery Procedure Liabilities? Please provide a rationale for your view.	Agree. It is reasonable that if DCC has to pay out Recovery costs in accordance with L.10, this amendment permits recovery from the breaching party up to £1m per event. We assume that £1m is a reasonable cap on liability and that it is unlikely a recovery event would exceed this limit.
Q14	Do you agree with the proposals, and associated legal drafting to use IKI for communications over the NGI and in relation to TAD? Please provide a rationale for your view.	Agree. The proposal allow for all data interfaces (whether systems based or manual) to be secured via the same standard approach.
Q15	Do you agree that it is necessary for the	Agree. The approach will ensure enough

	PMA to be able to require Parties to nominate Key Custodians? Please provide a rationale for your response.	custodians exist to the support the recovery process.
Q16	Do you agree with the proposals, and associated legal drafting to make clarificatory changes to the SMKI Certificate Policies? Please provide a rationale for your view.	Agree. The changes allow for the easy identification of the RFC 5280 terms within the SMKI Certificate Policies to provide greater clarity.
Q17	Do you agree with the proposals, and associated legal drafting to allow the DCC to become an Eligible Subscriber for certain SMKI Organisation Certificates for the purpose of signing Registration Data? Please provide a rationale for your view.	Agree. It is necessary for DCC to sign Registration Data but prevents the DCC from anonymously acting upon Devices in the role of 'Other user'.
Q18	Do you agree with the legal drafting to oblige Network Operators to establish their Organisation Certificates prior to DCC Live? Please provide a rationale for your view.	<p>We disagree with the legal drafting.</p> <p>We agree with the intent of the amendment in so far as it seeking to ensure that Network Operators are ready and able to provide the necessary public key certificates to enable Suppliers to complete their post commissioning obligations.</p> <p>The accompanying consultation document refers to an 'obligation for Network Operators to establish their SMKI Organisation Certificates by DCC Live' however the obligation as drafted in section X11.1 of SEC refers to Network Operators being ready 'Prior to the commencement of the provision of Enrolment Services by the DCC'. There is however no such clear milestone within the industry Joint Implementation Plan (JIP).</p> <p>Within the JIP there are three milestones which may equally be interpreted as being relevant to the obligation contained within X11.1:</p> <ul style="list-style-type: none"> <li>• JM_2015 SMKI and Repository Go-Live (February 2016),</li> <li>• JM_2016 DCC Live (April 2016); and</li> <li>• JM_4052 Central Planning Assumption for DCC Live (August 2016).</li> </ul> <p>A clarification received from DECC on the 1<sup>st</sup> May recommended that parties use the central planning assumption of August 2016 to be ready for 'DCC Live' but it is unclear whether this is the milestone to which the proposed SEC change relates. Note further that in order to become a subscriber for Organisation Certificates it will be necessary for a Network Operator to complete the SMKI and Repository Entry Process Testing (SREPT). As per DCC process this requires a minimum of 60 working days notice from the Network Operator before</p>

		<p>testing may commence and this may therefore have an impact on the ability of Network Parties to comply with both the SEC and DCC</p> <p>We believe therefore that the legal drafting is ambiguous as to the point at which 'commencement of the provision of Enrolment Services by the DCC' actually occurs.</p>
Q19	Do you agree with the proposal and legal drafting in relation to the miscellaneous changes to the PKI content? Please provide a rationale for your view.	Agree. The proposal reduces the administrative complexity of registering SRO and ARO roles with the SMKI RAPP and allows DCC to manage volumes of certificate signing requests
<b>Security Independence Requirements – Chapter 7</b>		
Q20	Do you have any comments on the proposed drafting regarding the CIO independence requirements?	No comment.
<b>Re-use of previously installed Communications Hubs – Chapter 8</b>		
Q21	Do you agree with the proposals, and associated legal drafting (including the proposed changes to the CHIMSM at Annex D), which would permit Suppliers to re-use Communications Hubs that they have removed from consumer premises in certain circumstances?	We agree but note that the DCC must ensure a robust mechanism to avoid the possibility of a re-installed Comms Hub being simultaneously assigned in an 'active' state against more than one Meter device within the inventory.
<b>Obligation for Energy Suppliers to engage with DCC queries on compliance with the Communications Hub Support Materials – Chapter 8</b>		
Q22	Do you agree with the proposal, and associated legal drafting, for an obligation for Supplier Parties to respond to any to any reasonable request from the DCC for information pertaining to compliance with the CH Support Materials and for a reciprocal obligation to be placed on the DCC?	Not applicable to Network Operator role
Q23	Do you agree with the proposals, and associated legal drafting (including the proposed changes to the CHIMSM at Annex D), relating to visits by the DCC to consumer premises?	Not applicable to Network Operator role
<b>Failure of Parties to accept delivery of Communications Hubs – Chapter 8</b>		
Q24	Do you agree with the proposal, and associated legal drafting, for Parties to be liable for all reasonable costs and expenses incurred by the DCC as a result of a delivery of Communications Hubs being prevented from taking place in accordance with the SEC, due to a breach of the SEC by that Party?	Not applicable to Network Operator role
<b>Consequential changes to the SEC for alignment with the Communications Hub Support Materials – Chapter 8</b>		
Q25	Do you agree with the proposals and associated legal drafting for the consequential changes to the SEC arising from the Communications Hub Support	Not applicable to Network Operator role

	Materials?	
<b>Miscellaneous Communications Hub issues – Chapter 8</b>		
Q26	Do you agree with the proposals as described under the heading of "Miscellaneous Communications Hub issues" above and the associated legal drafting?	<p>The legal text does not specify the mechanism by which DCC will identify the region into which a premise will be allocated however the accompanying consultation document refers to DCC identifying the region by PostCode. For Electricity Smart Meters we do not consider the PostCode to be suitable. Instead the Supplier/DCC should in the first instance always use the 'Distributor Identifier Code' of the MPAN number to determine the CSP region.</p> <p>The MPAN number should normally always be available prior to a Supplier needing to install a metering system. This approach will better ensure alignment between the Distributor regions and CSP regions and reduce the potential impact of the wrong Network Operator credentials being installed on devices in addition to mitigating the potential cost impacts of Network Operators having to cope with differing CSP Power Outage solutions (as is currently understood).</p>
<b>Incident Management – Chapter 9</b>		
Q27	Do you agree with the proposed changes to Incident Management? Please provide a rationale for your views.	<p>Agree. It is sensible to have generic requirements covered by a single incident management policy.</p> <p>The changes allow the appropriate Parties to view or update incidents and require Parties to work co-operatively to resolve incidents when they occur.</p>
<b>Governance of Error Handling Strategy – Chapter 9</b>		
Q28	Do you agree with the proposed approach to provide a more flexible governance for the Error Handling Strategy, set out above?	Agree
<b>Further Activation of the SEC Modification Process – Chapter 10</b>		
Q29	Do you agree with the proposals in relation to the timing of the further activation of the SEC Modification Process? Please provide a rationale for your response.	Agree. It will allow SEC Parties the opportunity to contribute directly the specification requirements for future releases of IT updates, procedures and processes beyond DCC Live.
Q30	Do you agree with the proposals and legal text in relation to the manner in which the SEC Modification Process is further activated, including the temporary performance of certain enduring Authority functions by the Secretary of State? Please provide a rationale for your response.	Agree. It will provide clarity and code version control while the Government performs the function (that the Authority will subsequently perform in enduring governance).
<b>Scope of the Threshold Anomaly Detection Procedures document – Chapter 11</b>		
Q31	Do you have any comments on the proposed drafting regarding the scope of the Threshold Anomaly Detection Procedures?	No comments
<b>Appeals of Panel Decisions relating to SMETS non-compliance – Chapter 11</b>		