BEAMA Response to the Government Consultation on New Smart Energy Code Content and Related Licence Amendments - February 2016

BEAMA is the trade association for British manufacturers of electrotechnical products. It represents manufacturers across the supply chain of smart products and devices.

Q14: Please provide your views on the draft direction for the insertion of a new X9 and the proposal to:

- **bring the new X9 into effect on 18 April 2016 (or as soon as possible thereafter),**
- **require the provision of the Pre-UEPT service from the date that X9 is effective,**
- **require the provision of the GFI service as soon as reasonably practicable, but in any event no later than the start of End-to-End testing,**
- **provide that the Pre-UEPT and GFI service will end when Section X ends, noting that the Secretary of State has the ability to direct an earlier end date?**

Please provide a rationale for your views.

We note with concern that this proposal assumes that provision and support for GFI will not be required after transition. BEAMA's position is that industry needs a reference tool for the DCC environment that gives certainty that products developed for the smart market against existing technical specifications will interoperate within the smart system, and confidence that changes to that environment or to the specifications will be manageable for all parties. The best way to ensure this is continued support for and provision of a tool that replicates exactly the DCC environment. Currently that tool is GFI. Thus far significant resource has been directed towards developing this reference tool for the smart DCC environment, and it has been essential for the development plans of all major stakeholders in the Programme. Removing the reference tool will add risk to the Programme and could be detrimental to the market and to the consumer experience, especially in the context of expected new iterations of technical specifications.

There is currently no certainty about whether GFI will be required after the expiration of Section X. BEAMA strongly urges the Government to retain in the SEC a provision enabling the Secretary of State to extend requirements on the DCC to support GFI beyond Section X, should that be deemed in the best interests of the Programme.

Q23: In relation to the removal of Manufacturer Release Notes from the CPL and the associated requirements for secure storage, do you agree with the proposed approach and legal drafting?

BEAMA supports the secure storage of Manufacturer Release Notes and accepts the proposed legal drafting. However, BEAMA has a clear position on proposals for a Central Firmware Library, which is that its members will not support it in its proposed form and will not provide images to it. We urge DECC to remove references to it in future publications. We are engaging with other industry stakeholders to agree an alternative solution that provides retailers and asset owners with the confidence they require but also protects manufacturer interests while maintaining the security of the smart metering system.

BEAMA understands the need for retailers to know the correct, most current version of firmware. We also understand that retailers need to know how to request access to the current version, often to tight timescales. But this requirement is best met using existing contractual architecture.

BEAMA is willing to consider supporting changes to the CPL that would ensure that retailers and asset owners know how to liaise with manufacturers to access the correct firmware versions. BEAMA would not support any change, in particular the provision of new information on the CPL, that risks compromising or adversely affecting the security of the system.