Smart Metering Implementation Programme
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Consultation Response: A Consultation on New Smart Energy Code Content and Related Licence Amendments - February 2016

Introduction

CMAP has considered the set of proposals in this consultation and the majority of policy positions in the consultation are not directly relevant to MAPs. However, we believe that there is merit in revisiting the proposals for ongoing support to GFI described in Section 8, therefore we provide a response to Questions 13 & 14 below.

Q13 Do you agree with the proposal and associated legal drafting to set a mandatory requirement on the DCC to provide a Pre-UEPT service and a GFI service?
Please provide a rationale for your views.

GFI is an extremely useful tool that has been used extensively by the meter manufacturer community to test and gain assurance of the compliance of meter assets.

This testing has had a knock-on effect of increasing confidence of MAPs to fund meters.

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 on18 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 agree with the stated rationale in making the provision of the informal testing services mandatory to de-risk device and system integration activities as well as future DCC test phases.

GFI does allow device manufacturers and other interested parties to test their smart meters with GBCS messages without the need to connect to the DCC via a DCC Gateway Connection and this is very important in de-risking device integration and compliance activities.

We support that early provision of both of these testing services is considered necessary in order to achieve the Transition Objective and therefore agree with the proposal to amend Section X of the SEC to introduce a new Section (X9) to require the provision of these GFI and Pre-UEPT testing services.

However, we do not support that GFI service provision should cease when Section X itself ceases to apply (as set out in X1.5) or that the Secretary of State can (pursuant to X6.3 of the SEC) specify an earlier end date by issuing a direction.

SMETS specifications are likely to continue to develop over time, as recognised by DECC in planning a Release Strategy for Technical Specifications Groupings. Whenever SMETS specifications change, there will be testing required to provide assurance and de-risk the integration of assets. GFI will be a powerful and useful tool in this process and CMAP believes that the continued provision and maintenance of GFI from DCC will be an economic and efficient way to provide this tool and de-risk asset integration in perpetuity.

Removing the GFI tool would add significant risk to the deployment of compliant smart meters and may require the Industry to develop its own alternative or leave individual participants in the meter supply chain to individually develop alternatives (which may be inconsistent). This would be inefficient, potentially expensive, and may not have the same reliability as GFI.

As such, CMAP strongly recommends that the requirement on DCC to provide GFI is extended beyond the end of the transitional arrangements or at the very least that there is a mechanism for the SoS to extend it (and not just finish it at the end of Section X provisions as currently proposed).