E.ON Response DECC; Consultation on New Smart Energy Code Content and Related Licence Amendments – February 2016

General Comments

We agree with many of the Smart Energy Code (SEC) changes and proposals in this latest consultation. However, we set out below a summary of the key areas where we disagree with the proposals.

Special Installation Mesh Communication Hubs

We are not convinced that the proposals for the Special Installation Mesh Communication Hub have been completely thought through from an operational and customer impact porspective. It is not clear what the customer journey would be like to achieve a successful installation of this equipment or what training is to be provided for our meter technicians. We are not in favour of these as drafted. We suggest that this area needs further work before the proposed changes can be taken forward and put into practice by industry parties.

Network Enhancement Plans

We do not agree with the proposals for Network Enhancement plan in the Central and Southern regions. This is the first we have heard of these and we have been provided with little information as to the impact that these will have on managing the services that we provide to our customers. As drafted the proposal seems to provide an indefinite period for the Communication Service Provider (CSP) to deliver its Wide Area Network (WAN). This creates uncertainty for suppliers as they try to manage customer expectations as there is no indication when the Network Enhancement will be completed. There is also no indication provided as to how many premises maybe impacted by a Network Enhancement plan which leads to supplier issues when trying to plan rollout resource and making customer appointments.

Enduring Change of Supplier

We are unconvinced that a case has been made to develop an Enduring Change of Supplier (ECoS) model. There is no detail in the consultation that sets out why DECC are concerned that the existing arrangements would be unsuitable in the longer term. DECC should set out its rationale for the need to further develop the ECoS model so that parties have a full understanding of the business impacts and potential costs and benefits of making the change or if in fact there is a do nothing option.

Manufacturer Release Notes

We do not believe it is a sensible proposal for individual suppliers to hold manufacturer release notes. The proposals as drafted have the potential to make the process less secure and less efficient as information will be held in multiple places. Having these notes stored and version controlled

centrally would in our view be a far more efficient and secure overall process for the industry to work with on a daily basis.

Device Status Change

We do not agree with the proposals to remove the requirement for the DCC to modify the SMI status of a device. This leads to a potential mismatch between supplier systems and the DCC. The impacts of this will mean that suppliers issuing service request commands may have these rejected by the DCC, (due to the mismatch in the status held between the parties).

Responses to Questions

Early Rollout Obligations

Q1. Do you agree that the proposed legal drafting implements the policy to introduce an Early Rollout Obligation on large suppliers by 17 February 2017? Please provide a rationale for your views.

Yes.

DCC User Mandate

Q2. Do you agree that the proposed legal drafting implements the policy to introduce an obligation for domestic energy suppliers to become DCC users by 17 August 2017 and for new entrants to become a DCC User before supplying gas or electricity? If you disagree please provide a rationale for your views.

Yes.

Q3. Do you agree that the proposed legal drafting implements the policy to introduce an obligation for DNOs to become DCC users by 28 April 2017? If you disagree please provide a rationale for your views.

Yes. As a supplier, we are more concerned as to the impacts of all suppliers becoming DCC Users. From this perspective we would not be concerned if DNOs started to take DCC services at a later date.

Special Installation Mesh Communications Hubs

Q4. Do you agree with the proposal and associated legal drafting to reflect matters related to the installation and maintenance of Special Installation Mesh Communications Hubs in the SEC? Please provide a rationale for your views.

No.

We are not convinced that the proposals for the Special Installation Mesh Communication Hub have been completely thought through from an operational and customer impact perspective. It is not clear what the customer journey would be like to achieve a successful installation of this equipment. We are not in favour of these changes as drafted and suggest that this area needs further work before the proposals can be taken forward and put into practice by industry parties. A number of significant questions remain outstanding as to how this would work in practice, for example,

What do customers get told about these devices and what choices do they have? It would seem

necessary to have customer consent prior to the installation of this sort of equipment, and may in some instances require planning permission. It is not clear how this would be agreed with either the customer or local planning authorities or how long this may take.
It is also completely unclear as to what training is being provided by the Communication Service Provider to meter installers, when and how will this be delivered.

Network Enhancement Plans

Q5. Do you agree with the proposal and associated legal drafting to reflect matters related to Network Enhancement Plans in the SEC? Please provide a rationale for your views.

No.

We do not agree with the proposal which appears to provide the Communication Service Provider (CSP) with a means to indefinitely put off delivering its WAN network. There is no means by which suppliers can plan their rollout or manage customer expectation when the supposed certainty of coverage is being removed as there is no indication when the Network Enhancement will be completed by.

If this change is progressed it has the potential to deliver a really poor customer experience which may have a lasting damage on the programme and a supplier's ability to install meters.

This consultation is the first we have heard of Network Enhancement Plans. There is no current reference to these in the SEC or any of its subsidiary documents. Until further information is available to provide more detail we are not able to support these changes. For example, there is no indication of the volumes of premises that may be affected at any time by such events and the impact to the end customer has been ignored.

User to Non User Churn

Q6. Do you agree with our approach that no changes are required to the Supply Licence Conditions as a result of churn of SMETS2 SMSs from DCC Users to non-DCC Users?

From a Supply Licence perspective this seems a sensible approach. As a supplier who is intending to be a DCC User for Non Domestic customers this will not directly impact us. However, we are still awaiting confirmation on the previously consulted policy opt out of Non Domestic suppliers (consulted March 2015). We also note the recently changed date on the Joint Industry Plan (CR048) relating to the Non Domestic response. We are concerned at the time the consultation response is taking, as we have to make design assumptions now, which may need to be changed depending on the final DECC response, for which there is no time available.

Enduring Change of Supplier

Q7. Do you agree with the 'minded to' position to align the start of the feasibility and design of the ECoS process with the Blueprint phase of CRS with the aim of linking the

design and build of the ECoS system with CRS development? Please provide a rationale for your views.

No.
We are unconvinced that a case has been made to develop an Enduring Change of Supplier (ECoS) model. There is no detail in the consultation that sets out why DECC are concerned that the existing arrangements would be unsuitable in the longer term. It would be helpful if DECC were to set out its rationale for the need to further develop the ECoS model so that parties have a better understanding of the business impacts and potential costs of both making the changes or if in fact there is a do nothing option.

Q8. Do you agree with the 'minded to' proposal for suppliers to take reasonable steps' to start to use ECoS from the point at which it becomes available?
Please provide a rationale for your views.

No. We would only support this once the case has unequivocally been made for the need to change from the current arrangements.

Q9. Do you agree with the principle of suppliers completing the move to ECoS within 6 months of the end of roll out i.e. 2020 or earlier? Please provide a rationale for your views.

No. It is not possible to determine how long is needed to make the necessary changes from the details in the consultation.
We would only support this once the case has been made for the need to change from the current arrangements.

Q10. Do you agree with the proposal for DECC to establish an industry working group under the transitional arrangements that will subsequently transfer to industry at a point to be agreed as part of the wider transitional arrangements? Please provide a rationale for your views.

Yes. The first task for this group should be to determine the need for any change, including a full cost benefit analysis to support the requirements.

DCC Additional Support
Q11. Do you agree with the proposal to extend the scope of H14.33 to allow the DCC to also provide Testing Participants with assistance with issues related to User Systems and Devices and allowing this assistance to be provided during or after testing?

Yes, we agree with the principle that the DCC should extend the offer to provide testing participants with assistance for User System related issues and devices.

Q12. Do you have any views on how Additional Support services should be charged for?

We do not agree with having to pay explicit charges for support that really should be provided as part of the service that DCC provides its customers.

Further Requirements on Testing

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.

Yes. We have previously advocated that a way to mitigate some of the risks to the programme that could arise in testing would be through the use of a pre EUPT environment and GFI service.

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 would like to see these services provided as soon as possible. We therefore agree with the proposed timing of the new X9 coming into effect on 18 April 2016 (or as soon as possible thereafter) and the provision of GFI services as soon as practicable.
We agree that these services could end when section X is no longer applicable.

Q15. What are the benefits of providing Pre-UEPT services beyond the go live date for Release 1.3 functionality? Please provide a rationale for your views.

We believe the reference here should be Pre UIT and not UEPT. As such, we do not see benefit extending these services beyond the 1.3 release. We believe the provision in the Common Test Scenarios Document for connectivity testing prior to UEPT provides sufficient testing requirements.

Q16. Do you agree with our proposed amendments for additional SIT, Interface Testing

and SRT Testing? Please provide a rationale for your views.

Yes this is sensible.

Q17. Do you agree with our proposed amendments for the length of the End to End Testing Period? Please provide a rationale for your views.

Yes.

Q18. Do you agree with our proposed amendments for additional phases of Service Request testing? Please provide a rationale for your views.

Yes. This is a sensible approach.

Q19. Do you agree with our proposed amendments to the relevant versions of the SEC for testing purposes? Please provide a rationale for your views.

Yes.

SEC Panel and DCC Live Criteria Assessment
Q20. Do you agree with the proposal and associated legal drafting? Please provide a rationale for your views.

Yes. It is sensible that oversight of the performance of the DCC in reaching "DCC Live" is undertaken by Users. The use of the SEC Panel to do this is a useful addition to the assurance techniques available to the SMIP.

Security
Q21. Do you agree with the proposed approach and legal drafting that seeks to ensure that only disputes associated directly with the issue of compliance with Section G are determined by us, with other disputes following the "normal" path for resolution?

Yes.

Q22. In relation to the need for DCC to test and monitor the security of Cryptographic Credential Tokens, do you agree with the proposed approach and legal drafting?

Yes.

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?

No. We are concerned that the proposals as drafted may make the process less secure and less efficient.
The proposals suggest information will be held in multiple places as individual suppliers will need to hold copies for every manufacturer's device Release Notes. This introduces a risk, that the set of notes one supplier holds in its possession, becomes out of line with that of another, as these may be edited by parties and not notified to all.
In addition, the proposal infers that suppliers and manufacturers will have to have arrangements for ensuring that notes are provided to all parties as a result of change of supplier events, where a device will transfer from the supplier who originally procured and installed the device to another supplier.

Having these notes stored and version controlled centrally would in our view be a far more efficient and secure overall process for the industry to manage. This should be a separate, secure area from the Central Firmware Library.

Q24. In relation to the inclusion of systems used to generate a UTRN within the scope of the User System, do you agree with the proposed approach and legal drafting?

Yes.

Privacy and Explicit Consent
Q25. Do you agree with the proposal to include a definition of Explicit Consent and do you have any comments on the proposed drafting? Please provide a rationale for your views.

Yes we agree with the principle, to ensure that customers have explicitly set out to the User their requirements. However, it is not clear in the drafting how such Explicit Consent should be obtained and or recorded by the User.

Changes to Section H (DCC Services)
Q26. Do you agree with the proposal and associated legal drafting to consult with Parties and Registration Data Providers prior to changes to DCC Internal Systems or the Release Management Strategy? Please provide a rationale for your views.

Yes this seems a sensible approach.

Q27. Do you agree with the proposed change to remove the requirement on RDPs to raise an incident where the issue can be resolved by the transmission of an unsolicited registration data refresh file? Please provide a rationale for your views.

n/a – RDPs to answer

Q28. Do you agree with the proposals and associated legal drafting to the recovery and data loss obligations in regard to a Disaster? Please provide a rationale for your views.

This seems reasonable.

Rectifying Errors in Relation to Device Credentials
Q29. Do you agree with the proposal to clarify that Users are permitted to send the relevant Service Requests? Please provide a rationale for your views.

Yes this seems reasonable.

Panel/IKI Subscribers
Q30. Do you agree with the proposal and associated legal drafting to permit SECCo to become a Subscriber for IKI File Signing Certificates for the purposes of Digitally Signing the CPL as set out above? Please provide a rationale for your views.

Yes.

Status of Associated Devices
Q31. Do you agree with the proposals to remove the requirement for DCC to modify the SMI Status of a Device in circumstances where the status of a Device with which is associated changes, and to clarify by when suppliers must ensure that the appropriate Device Security Credentials are placed on a Device? Please provide a rationale for your views.

No.

Without the inventory being correctly updated mismatches between supplier systems and the DCC may occur. This will mean that that suppliers issuing Service Requests, may have these requests rejected by the DCC, due to the mismatch in the status held between either of the parties (supplier and the DCC). For example a set of commands could be issued with the following outcome;

- A No WAN installation occurs and devices at the premise are set to "Installed not commissioned" status
- WAN then becomes available, but device status is not updated to "commissioned".
- A supplier then wishes to uninstall an asset; the DCC rejects the request as it is not possible to uninstall a device that has not got a status of "commissioned".

Whilst there is potential for these issues to be resolved the timescales are potentially long

(hours), if this occurs at the time meters are being installed, this would greatly increase the installation time for suppliers and customers potentially making the installation impractical leading to reputational programme issues, complaints and an up lift in costs for suppliers and the wider rollout.

Post Commissioning Reporting

Q32. Do you agree with the proposal to change the reporting obligations on DCC in relation to Devices Commissioned between DCC Live and Release 1.3? Please provide a rationale for your views.

Yes. This would seem reasonable on the assumption that the period between R1.2 and R1.3 is limited to a number of weeks. If this were for some reason to be extended into months, this would need to be reviewed.

Subscriber Obligations for certain IKI FILE Signing Certificates

Q33 Do you agree with the proposals to modify the subscriber obligations in relation to Certificate Signing Requests generated by DCC-provided software and to place an additional obligation on DCC in relation to these in Section G?

Yes this seems reasonable.

RDP IDs and DCC Reporting under Section E

Q34. Do you agree with the proposal not to make transitional changes to the SEC to deal with these matters and instead to rely upon RDPs and the Panel to work with DCC within the confines of its Systems Capability on a transitional basis?

n/a - for RDP to respond

Miscellaneous Issues and Minor Amendments to Drafting

Q35. Do you agree with the proposal legal drafting amendment to C3.13? Please provide a rationale for your view.

Yes this is sensible

Q36. Do you agree with the proposed legal drafting amendments to Section E2? Please provide a rationale for your view.

Yes this is sensible.

Changes to provide flexibility to accommodate changes arising during testing?

Q37. Do you agree with the proposal to remove these documents from the SEC and to

re-introduce them (including any enduring changes made using Section X) by designation under Condition 22/Section X5 of the SEC?

Yes this seems a sensible approach.

Test Communications Hubs

Q38. Do you agree with our proposal and legal drafting in relation to Test Communications Hubs? Please provide a rationale for your response.

Yes. We are supportive of the provision of these devices at the earliest opportunity.

Consistent terminology on "all reasonable steps"

Q39. Do you agree with the proposal and associated legal drafting to align the wording of obligations throughout the SEC?

Yes. Aligning these elements should assist the DCC and DCC Users with their understanding of these obligations through a consistent approach.

Incident Management Policy

Q40. Do you agree with the proposed changes to the Incident Management Policy? Please give reasons to support your answer.

Yes, these appear to be sensible clarifications.