



E.ON Response to the statutory consultation on a proposal to modify the conditions of the smart meter communication licence

E.ON has no concerns with the proposed legal drafting itself, however, its introduction does cause us concern on wider issues that we take the opportunity to bring to Ofgem's attention.

Firstly, one interpretation of the requirement that the *"Licensee shall comply with the obligations expressed to apply to it [in the] Balancing and Settlement Code"* could well mean that the DCC becomes conflicted in the services that it delivers/operates. If the requirements of the BSC and SEC conflict either immediately or over time, how does the DCC resolve this without detrimentally impacting its service to users either through late programme delivery, sub-optimal service operation, or additional costs? We would expect strong oversight and governance from Ofgem in ensuring that conflicts are resolved and that the DCC delivers to time, specification and cost.

Secondly, it is reasonable to assume that the MWHHS introduction will result in changes to the end-to-end smart metering infrastructure. Some of these changes will be in the control of the DCC, while others (e.g. impacting the SMETS meters) will be outside of their control. In the event that the MWHHS solution relies on meter configuration or firmware changes, these could be lengthy and complex to implement, especially if there is a lack of clarity on the requirements or solution. To ensure the MWHHS solution is workable and stable, the DCC will have to rely on activities by other parties who may be pulling in other directions, even if there are other Licence Conditions applied to these other parties. We therefore believe further consideration is required on this by Ofgem.

Thirdly, we believe there should be a greater consumer focus at the forefront of MWHHS, protecting the interaction and experience of the consumer and safeguarding access to smart services at all times, and thus by extension services to the supplier.