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**Re: Consultation on Licence Modifications for Switching Programme**

Dear Rachel,

Thank you for the opportunity to respond to your consultation on the Smart Meter Communication Licence amendments required for the Switching Programme.

The proposed amendments to the Licence revolve around the solution for the Central Switching Service as being defined under the Retail Energy Code. These amendments do not impact the services currently required of the DCC under the Smart Meter Communication licence. As such we do not have any specific comments on the drafting provided, noting it predominantly reflects that which we have reviewed previously.

However, there are two key points that we would like to flag. Firstly, whilst the SEC changes required to deliver faster switching are relatively minor, we have concerns regarding the wider programme impact on the DCC. When taken in isolation the smart systems change from a SEC perspective are limited. In essence, the DSP now receives data from the CSS rather than networks. However, outside of the SEC specific changes there is a significant impact on the DCC and the systems it is responsible for as part of this Programme. On top of that the DCC systems are to be used for Market Wide Half Hourly Settlement. It has always been a concern of the SEC Panel that there should be no degradation of service to the smart metering systems as the DCC takes on further roles. Can you advise to what extent the operational impacts of faster switching (timings, capacity) on the DCC services/infrastructure have been surveyed so far? We would like to mitigate the risk that apparently small SEC changes could conceivably have significant operational impacts.

Secondly, whilst we appreciate the reasons the Smart Meter Communication licence has been used to capture the new governance and regulation on the Central Switching Service, we believe some consideration should be given to where this governance is most appropriate. If the role of the CSS is not a licensable activity then it seems more appropriate to place the regulation under the REC rather than in a licence. As such we also believe that the detail of the communication standards set out in the consultation should sit within the REC.

If you have any questions or would like to discuss further, please don't hesitate to contact myself on 0207 770 6921

Yours sincerely,

Adam Lattimore  
SECAS