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Dear Margaret,

ENERGY NETWORKS ASSOCIATION RESPONSE TO THE SMART METERING PROSPECTUS (JULY 2010) – PART 2

Thank you for the opportunity to comment on the second set of questions within the prospectus and associated documents released in July 2010. This response supports the previous ENA response dated 28th September 2010.

ENA is fully represented at the SMDG and DCG Expert Groups and associated sub-groups and is engaged in detailed discussions within these groups. ENA's responses to the Prospectus which are contained in this document supports the points currently being made within these detailed consultation discussions.

Specific responses to the prospectus questions requiring a response by 28th October 2010 are detailed in Appendix 1. These comments are submitted in addition to and in support of individual responses which may have been sent to you from ENA member companies.

Yours sincerely,

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Appendix 1 – Smart Metering Implementation Programme: Prospectus (27 July 2010)

PROSPECTUS GENERAL (28/10)

CHAPTER 2

Question 1: Do you have any comments on the proposed minimum functional requirements and arrangements for provision of the in-home display device?

ENA supports the additional functionality required to send and display messages on the IHD. As an example Network Companies will use this facility to notify consumers of 'planned outages'.

Question 2: Do you have any comments on our overall approach to data privacy?

Network companies will require non-customer specific data from smart metering for network planning and operational purposes. The design and governance of the smart metering system and network related data flows will need to ensure customer data privacy is maintained.

Question 4: Have we identified the full range of consumer protection issues related to remote disconnection and switching to prepayment?

No response

Question 5: Do you have any comments on the proposed approach to smaller non-domestic consumers (in particular on exceptions and access to data)?

ENA supports the view that non-domestic metering should be connected to the DCC and network companies should have access to network related data.

CHAPTER 3

Question 8: Do you have any comments on the proposals that energy suppliers should be responsible for purchasing, installing and, where appropriate, maintaining all customer premises equipment?

Gas and Electricity service termination equipment is owned and maintained by the network companies. The ENA smart metering working group through MOCOPA and MAMCoP are establishing procedures for roll-out inspection and defect reporting.

Question 9: Do you have any comments on the proposal that the scope of activities of the central data and communications function should be limited initially to those functions that are essential for the effective transfer of smart metering data, such as data access and scheduled data retrieval?

ENA agrees that the scope of the DCC should, at least initially, be limited to the functions that are essential for the effective utilisation of smart metering facilities. Provision of the centralised communications service to enable the effective transfer of smart metering data will deliver the vast majority of the benefits that smart meters offer including initial smart grid requirements. This will include the provision of networks related data to network companies.

Whilst it will be a relatively simple change for DNOs to make registration data available to the DCC for user authentication purposes, the overall delivery of the service will be a major

undertaking covering many areas and organisations and which has to be delivered in a relatively short timescale.

As stated in the prospectus and supporting documents, the introduction of smart meters will provide opportunities to streamline and improve various existing industry processes. This would include improvements to registration.

However the magnitude of re-engineering the existing gas and electricity change of supplier activities into one common process should not be underestimated. In particular, this could be happening in parallel with the overall smart meter implementation programme.

Such an approach would add significant scope and complexity to the overall programme. This work is not essential for the provision of the smart meter service and could put at risk the anticipated delivery schedule for the DCC.

As mentioned in the Prospectus and supporting documentation the extension of DCC scope to include further functions would require a robust cost/benefit analysis. ENA agrees with this approach but in addition believe such a process should also be mindful of the risks to the programme of increasing the scope of work to be undertaken.

ENA's preferred approach would be:

1. Implement the minimum functions that are essential for the effective utilisation of smart metering facilities within the current timescales. Early realisation of network benefits from the availability of networks related smart metering data is a key requirement.
2. Subject to a proven business case, extend the scope of DCC through an achievable implementation schedule bearing in mind the requirement to bed in the initial service.

Question 10: Do you have any comments on the proposal to establish DCC as a procurement and contract management entity that will procure communications and data services competitively?

This approach works well in other areas, such as the provision of the Electricity Data Transfer Network, and should therefore ensure the industry is initially provided with a valued service.

Question 11: Do you have any comments on the proposed approach for establishing DCC (through a licence awarded through a competitive licence application process with DCC then subject also to the new Smart Energy Code)?

No specific comments here.

Question 12: Does the proposal that suppliers of smaller non-domestic customers should not be obliged to use DCC services but may elect to use them cause any substantive problems?

If use of the DCC is optional there is a danger that this information may not be made available or in a format that is consistent and customers could lose the opportunity to benefit. Therefore ENA would support the suppliers of these consumers being obliged to use DCC services.

Network operators will require information from all consumer types that are connected to their networks in order to manage and operate future smart grid technologies. It is important that no consumer groups are omitted and that there is a single means of accessing the necessary information/data. Mandating suppliers to use the DCC for non domestic

customers would provide an essential element for the development of smart grid opportunities in this important sector. The domestic sector only accounts for 30% of total system use; the remaining 70% comes from the industrial and commercial sector. There are significant benefits to be achieved by applying smart grid technologies across the SME element of the Industrial and Commercial sector.

Use of the DCC would facilitate the most cost effective means of data provision for future smart grids and ensure that multiple interfaces with many different suppliers are avoided.

The proposed approach of not mandating DCC use in the non domestic sector will severely limit future smart grid opportunities and the potential benefits that could be achieved by application to these high consuming customers. It will be difficult for network operators to be able to get data on demand, unless separate systems are developed. These will inevitably be over complex and expensive to develop/operate. If the DCC is not mandated for non domestic customers network operators may need to develop alternative (duplicate) systems, including the possibility of needing to install additional equipment in the customers' premises.

Question 13: Do you agree with the proposal for a Smart Energy Code to govern the operation of smart metering?

ENA supports the creation of the Smart Energy Code and believes that it should be at the heart of the new commercial and regulatory framework for smart metering.

The Smart Energy Code (SEC) will need to define the relationships between all industry parties and their obligations to each other and customers. It should address all aspects of central governance, including Change Control, Design Authority, Accreditation Agent, Commercial Framework, Interoperability, Network Requirements and Installation. It is here that any interim pre-smart mandate arrangements/obligations should be set out including the commercial and technical interoperability framework post smart mandate, pre-DCC (if applicable) and post DCC. The SEC scope will need to be agreed and implemented as a priority in order to take ownership of the smart metering system commercial interoperability and design requirements.

ENA believes that the structure of the SEC should take the form of an SEC Co owned by the signatories to the SEC itself. All licensed parties – domestic and non-domestic suppliers, DNOs, IDNOs, GDNs and IGTs should be signatories.

Consideration should also be given to extending the scope to include a standard multilateral default Meter Asset Provision (MAP) agreement, signed up to by all suppliers and Meter Asset Providers (covering both gas and electricity meters).

Question 14: Have we identified all the wider impacts of smart metering on the energy sector?

ENA is pleased to note that the link between smart metering and smart grids is well established within the Prospectus. The DCG expert groups is considering how to future proof the DCC to allow the flexibility for additional services to be added including where appropriate, future smart grid services.

Question 15: Is there anything further we need to be doing in terms of our ensuring the security of the smart metering system?

ENA is supporting the proposed Ofgem E-Serve security group and will positively contribute to these considerations. There will be a need to consider the security issues for smart metering as part of the wider cyber security work for the energy systems.

CUSTOMER PROTECTION (28/10)

CHAPTER 2

Question 1: Do you have any views on our proposed approach for addressing potential tariff confusion? What specific steps can be taken to safeguard the consumer from tariff confusion while maintaining the benefit of tariff choices?

ENA is working jointly with ERA members in considering the implications of 'demand response' for network management purposes and how that can be incentivised through tariffs and individual supply contracts with consumers and 'prosumers' (producer/consumers).

ENA believes that as smart grids are developed to enable exporting renewable micro-generation and changing energy usage patterns significant changes in tariffs will develop over time. How this is communicated to consumers will be essentially important to realise the energy efficiency benefits from smart metering and smart grids.

Question 2: Do you agree with our proposed approach for addressing unwelcome sales activities during visits for meter installation?

It is important to maintain a positive customer experience during the smart metering roll-out. ENA would not support unwelcome sales activities as part of the smart metering roll-out.

Question 3: What do you consider as acceptable and unacceptable uses of the installation visit and why?

The installation visit allows the chance to view all domestic installations in the UK, and this should be seen as a opportunity for suppliers and networks businesses. Apart from the installation work necessary, the installer at the time of the visit should ensure a quick examination is conducted of the service position and its associated relationship with the customer's electrical and gas installation.

ENA member companies are currently working with suppliers, meter operators, HSE, consumer groups and other agencies to identify the issues which may be apparent in an installation and define what checks should be undertaken by the installer at the point of installation. If conducted appropriately, this will help to provide an improvement in the safety of the service position post smart meter roll out.

This opportunity depends highly on the training and competency of the installer and again ENA member companies are working with Meter Operators, the AMO, industry training centres and the National Skills Academy for Power to ensure this is achieved.

This once in a lifetime opportunity to rectify latent service position issues and identify possible consumer equipment issues should be a real focus of the roll out programme. ENA member companies are working together to be ready to support the roll out and indeed members are currently working directly with one supplier who has taken the opportunity to begin the roll out early.

It should be recognised however that whilst installers will have the competence to identify service position issues they will not necessarily have the electrical competence to identify consumer issues other than obvious damage to consumer units etc. This will however still be of benefit to the consumer and dual fuel or gas only installers will have the technical knowledge to identify gas equipment issues during the purging and reconnection of appliances on site.

In general terms, customer installation issues may also be identified during the installation and if unsafe or unsound installation issues are identified by the installer, this should be flagged up to the customer. This however should not be seen as an opportunity to sell services at the point of meter installation.

There are a wide range of other issues which should be considered as unacceptable during the installation visit (selling of additional services etc), but as we believe these will be adequately covered by consumer groups' responses it would be inappropriate for ENA to comment on these issues.

Question 4: Do you agree with our proposed approach to ensuring that the IHD is not used to transmit unwelcome marketing messages?

No response

Question 5: Do you agree that consumers should be able to obtain consumption information free of charge at a useful level of detail and format? How could this be achieved in practice?

ENA agrees that consumers should be able to obtain consumption information. This could be facilitated through the IHD from data stored in the meter and/or through a web based application connected to the supplier or DCC.

CHAPTER 3

Question 6: Do you consider that existing protections in the licence are sufficient to ensure that consumers are not remotely switched to prepayment mode inappropriately?

No response

Question 7: Could provision of an appropriate IHD help overcome meter accessibility issues to facilitate prepayment usage?

This would avoid service position alteration costs – needs to be subject to a cost benefit analysis. This is not a new problem but a technical solution would reduce barriers for customers to switch to prepayment arrangements.

Question 8: What notification should suppliers be required to provide before switching a customer to prepayment mode? 46 Consumer Protection 27 July 2010 Appendices.

No response

Question 9: Do you believe that suppliers should be required to provide emergency credit and „friendly credit“ periods to prepayment customers or whether, as now, this can be left to suppliers?

No response

Question 10: Do you consider that an obligation similar to Prepayment Meter Infrastructure Provision (PPMIP) may be required?

No response

Question 11: Is the obligation which Ofgem is proposing to introduce on suppliers to take all reasonable steps to check whether the customer is vulnerable ahead of disconnection sufficient? If not, what else is needed?

No response

Question 12: What notification should suppliers be required to provide before disconnecting a customer?

No response

Question 13: Do you have any views on the acceptability of new approaches to partial disconnection and how they might be used as an incentive to pay bills?

The question relates to Supplier arrangements and therefore ENA does not have a response.

ENA has included a smart metering requirement for load limiting functionality that can be applied to limit load capacity to a predetermined level. This is for network considerations and to identify load increases beyond agreed capacity agreements.

Question 14: Do you agree with our approach for addressing issues related to remote disconnection and switching to prepayment?

No response

Question 15: Have we identified the full range of consumer protection issues associated with the capability to conduct remote disconnection or switching from credit to prepayment terms? If not, please identify any additional such issues.

No response

CHAPTER 4

Question 16: What information, advice and support might be provided for vulnerable consumers (e.g. a dedicated help scheme)? Who should it be provided to?

No response

CHAPTER: 5

Question 17: Do you have any comments on our proposals to prevent upfront charging for the basic model of smart meters and IHDs?

No response

IN HOME DISPLAY (28/10)

CHAPTER 2

Question 1: We welcome views on the level of accuracy which can be achieved and which customers would expect, in particular in relation to consumption in pounds and pence.

No response

Question 2: We welcome evidence on whether information on carbon dioxide emissions is a useful indicator in encouraging behaviour change, and if so, how it might be best represented to consumers.

ENA would support the provision of information on CO₂ emissions through the IHD.

Question 3: We welcome views on the issues with establishing the settings for ambient feedback.

No response

Question 4: Do you think that there is a case for a supply licence obligation around the need for appropriately designed IHDs to be provided to customers with special requirements, and/or for best practice to be identified and shared once suppliers start to roll out IHDs?

No response

Question 5: We welcome evidence on whether portability of IHDs has a significant impact on consumer behavioural change.

No response

Question 6: Do you agree with the proposed minimum functional requirements for the IHD?

ENA supports the additional functionality required to send and display messages on the IHD. As an example Network Companies will use this facility to notify consumers of 'planned outages'.

CHAPTER 3

Question 7: Do you have any views or evidence relating to whether innovation could be hampered by requiring all displays to be capable of displaying the minimum information set for both fuels?

No response

Question 8: Do you agree with the proposals covering the roles of and obligations on suppliers in relation to the IHD?

No response

COMMUNICATIONS BUSINESS MODEL (28/10)

CHAPTER 2

Question 1: Do you agree that access control to secure centrally-coordinated communications, translation services and scheduled data retrieval are essential as part of the initial scope of DCC?

ENA believes that these functions are necessary to deliver the initial and main benefits of smart metering.

ENA notes that section 2.44 of the consultation documents makes specific reference to Suppliers requiring ad-hoc readings, in addition to scheduled reads. This facility should also be available to other authorised parties such as Network Operators.

ENA believes that there should be an aspiration to apply the scope of the DCC to the entire electricity and gas smart meter market, rather than allowing exclusions for certain sectors, for example for non-domestic customers. This is particularly important for network operators who will require networks related smart metering data from all consumer profile classes in order to plan and operate smart grids.

Question 2: Do you agree that meter registration should be included within DCC's scope and, if so, when?

The meter registration service is not a "core business" for Network Operators so ENA has no fundamental objection to extending the scope of the DCC to include it.

However, at this time, ENA questions whether there is sufficient information on which to base a decision as to whether or not registration should be included within DCC's scope. No detailed proposals have been tabled as to how any new registration and change of supplier processes will work if they are placed within the DCC.

ENA members have concerns that the information requests may at best generate high level estimates with assumptions that will not be consistent across respondents. Therefore it is difficult to see how an informed decision can be made as to whether the scope of the DCC should be expanded from the initial scope in the prospectus.

Once detailed proposals are produced then a formal review can be undertaken to establish a resilient cost-benefit analysis. As a matter of principle, the registration service should only be included within the scope of the DCC activities if and when a robust cost-benefit analysis proves the case.

ENA agrees that it would not be prudent for DCC to take responsibility for this at system start-up as the additional industry changes required, which are likely to be significant, have the potential to delay the DCC implementation.

Irrespective of where the registration system is placed, the generation of the MPAN/MPRN and ownership of the address should remain with the Network Operator. These functions are fundamental to distribution systems & processes such as New Connections, Asset Management, Fault Reporting, the Customer Enquiry Service and Network System Mapping.

Any changes in this area are likely to have significant impacts on the ENA members and would require further in depth analysis.

ENA is fully engaged in the DCG expert group and associated sub-groups and the ENA representatives on these groups are providing detailed comments into this consultation process.

Question 3: Should data processing, aggregation and storage be included in DCC's scope and, if so, when?

ENA is unable to form a view on this as the costs and benefits have not been sufficiently analysed. In line with previous responses ENA's view is that implementation of these services should not be considered at DCC start up.

Network Companies will require early realisation of networks related smart metering benefits so access to this data will be required at DCC start up and possibly during the interim pre DCC arrangements.

Extension of the DCC scope from the initial essential activities should be subject to a cost-benefit analysis and a decision made based on that analysis.

The existing industry codes contain tried and tested change procedures and should be used so that an open and balanced assessment of proposed changes can be made.

This change process should ensure that Network Companies existing requirements in respect to receipt of settlement data will continue to be met and that service levels are maintained.

Question 4: Do any measures need to be put in place to facilitate rollout in the period before DCC service availability and the transition to provision of services by DCC, for example requiring DCC to take on communications contracts meeting certain pre-defined criteria?

ENA is currently not convinced on the need for a staggered smart metering roll-out and DCC start date. The amount of effort and expense to establish an interim arrangement for a short period of time is becoming increasingly questionable. ENA would support an earlier date for the establishment of DCC initial services as this will reduce the amount of rework to connect installed smart metering to the DCC.

This would also facilitate the early realisation of network benefits through the availability of networks related smart metering data being made available to network companies by the DCC.

CHAPTER 3

Question 5: Do you agree that the licensable activity for DCC should cover procurement and management of contracts for the provision of central services for the communication and management of smart metering data?

ENA agrees that this is reasonable.

Question 6: Do you consider that DCC should be an independent company from energy suppliers and/or other users of its services and, if so, how should this be defined?

ENA agrees that the DCC should be an independent company from energy suppliers and/or other users of its services subject to similar separation obligations to those in DNO licences.

Question 7: Do you have any comments on the steps DCC would need to take to be in a position to provide its services and the likely timescales involved?

ENA supports the acceleration of the establishment of the DCC to reduce the need for interim arrangements to be put in place. ENA believes that a staged implementation of DCC will deliver the necessary early benefits, providing more time to implement the wider design requirements of the fully operational DCC.

Question 8: Do you have any comments on the proposed approach to cost recovery and incentivisation for DCC?

ENA assumes that the DCC will be largely funded by suppliers. As a general principle, charges should be cost reflective and not act as a barrier to entry for small users.

DATA PRIVACY AND SECURITY (28/10)

CHAPTER 3

Question 1: Do you have any comments on our overall approach to data privacy?

Network companies will require non-customer specific data from smart metering for network planning and operational purposes. The design and governance of the smart metering system and network related data flows will need to ensure customer data privacy is maintained.

Question 2: We seek views from stakeholders on what level of data aggregation and frequency of access to smart metering data is necessary in order for industry to fulfil regulated duties.

Networks related smart metering data will be required upon request and in general on an ad-hoc basis.

Question 3: Do you support the proposal to develop a privacy charter?

No response

Question 4: What issues should be covered in a privacy charter?

No response

CHAPTER 4

Question 5: Do you agree with our approach for ensuring the end-to-end smart metering system is appropriately secure?

ENA is supporting the proposed Ofgem E-Serve security group and will positively contribute to these considerations. There will be a need to consider the security issues for smart metering as part of the wider cyber security work for the energy systems.

REGULATORY AND COMMERCIAL (28/10)

CHAPTER 2

Question 1: Have we identified all of the key elements that you would expect to see as part of the Smart Metering Regulatory Regime?

ENA believes that the key elements have been covered and are currently being discussed within the working groups.

CHAPTER 3

Question 2: Do you agree with the proposal to establish a Smart Energy Code?

ENA agrees that this is likely to be more effective and simpler to manage than the alternative option of inserting new requirements in to existing industry codes. We believe that a new Smart Energy Code should be at the heart of the new commercial and regulatory framework for smart metering.

Question 3: Do you have any comments on the indicative table of contents for the Smart Energy Code as set out in Appendix 3?

The table of contents for the proposed new code appears to cover the key areas where governance is required.

Question 4: Do you have any comments on the most appropriate governance arrangements for the Smart Energy Code?

It is important to take account of the expected Significant Code Review in 2011 and this is likely to have an impact on the most appropriate governance arrangements for the Smart Energy Code.

The structure of the SEC should take the form of an SEC Co owned by the signatories to the SEC itself. All licensed parties – domestic and non-domestic suppliers, DNOs, IDNOs, GDNs and IGTs should be signatories.

At the highest level, the Code should only contain the main rules and principles for the operations carried out under the Code.

These high level requirements should be overseen by a small, elected and representative panel of industry experts, supplemented as necessary by the Code Administrator, an independent chairman, and representatives from the regulatory body and customer groups. Changes to the high level requirements should be subject to a modification process similar to the existing BSC modification process, where industry and other parties can propose changes which are developed by working groups and passed to the Panel for decision. All detailed requirements should be contained in subsidiary documents which, subject to there being no impact on the high level Code requirements, can be developed and amended by a simpler process.

This also has similarities to the BSC change process but we would prefer less involvement from Code administrators and more involvement from industry.

Unlike the BSC, decisions on accepting or rejecting these changes should be made by a representative industry group, including Network Operators. The MRA change process offers a good model for managing the detailed issues of the code.

CHAPTER 4

Question 5: Do you agree with the proposals concerning the roles and obligations of suppliers in relation to the WAN communications module?

No response

Question 6: We welcome views as to which other additional data items should be included in the mandated HAN data set beyond the list for the IHD.

No response

Question 7: Do you agree with the proposal that the WAN and the HAN in customer premises should be shared infrastructure, with the installing supplier retaining responsibility for ongoing maintenance? If not, would you prefer to have an arrangement by which if the gas supplier is the first to install, responsibilities for the common equipment is transferred to the electricity supplier when the electricity smart meter is installed? 47 Regulatory and Commercial Framework 27 July 2010 Appendices

No response

CHAPTER 5

Question 8: Are there additional measures that should be put in place to reduce the risks to the programme generated by early movers?

ENA supports early movers as this will provide a level of experience in the installation of smart metering and communication systems.

Question 9: What is needed to help ensure commercial interoperability?

No response

Question 10: Can current arrangements for delivering technical assurance be developed to gain cost effective technical assurance for the smart metering system? If so, how would these procedures be developed and governed?

ENA is supporting the SMDG SG2 sub-group on governance for delivering technical assurance.

Question 11: Are there any other regulatory and commercial issues that the programme should be addressing?

ENA members will need to be reassured that any extra networks expenditure incurred supporting the accelerated smart meter roll-out will be acknowledged within their respective price controls.

CHAPTER 6

Question 12: What evolution do you expect in the development of innovative time-of-use tariffs? Are there any barriers to their introduction that need to be addressed?

ENA is working jointly with ERA members in considering the implications of 'demand response' for network management purposes and how that can be incentivised through

tariffs and individual supply contracts with consumers and 'prosumers' (producer/consumers).

Ofgem has encouraged increasing standardisation of electricity distribution tariffs. This may not be sustainable if networks need to send price signals to encourage demand response.

Question 13: Are there changes to settlement arrangements in the electricity or gas sectors that are needed to realise the benefits of smart metering?

ENA believes that this will need to be considered of the Significant Code Review for smart metering which is expected to take place in 2011.

Question 14: What arrangements would need to be put in place to ensure that customers located on independent networks have access to the same benefits of smart metering as all other customers?

ENA supports the view of their independent network members that no additional arrangements will need to be put in place.

Question 15: Are there any other industry processes that will be affected by smart metering and which the programme needs to take into account?

ENA is aware that the Government Green Deal proposals which are expected to take effect by the end of 2012 will impact upon networks registration systems.

NON DOMESTIC SECTOR (28/10)

CHAPTER 3

Question 1: Are there any technical circumstances where only advanced rather than smart metering would be technically feasible? How many smaller non-domestic customers have U16 or CT meters and what scope is there for full smart meter functionality to be added in these cases?

No response

Question 2: Do you agree with our proposed approach to exceptions in the smaller non-domestic sector?

ENA supports the view that non-domestic metering should be connected to the DCC and network companies should have access to network related data.

Question 3: Are there technical circumstances that we have not considered that would justify further flexibility around installation of either smart or advanced meters?

Refer to answer provided under question 2 of this question set.

CHAPTER 4

Question 4: Do you agree with the proposed approach that use of DCC should be optional for non-domestic participants in the sector?

Refer to answer provided under question 2 of this question set.

Question 5: If use of DCC is not mandated for non-domestic customers, do you agree with the proposed approach as to how it offers its services and the controls around such offers?

Refer to answer provided under question 2 of this question set.

Question 6: To what extent does our proposed approach to the use of DCC for non-domestic customers present any significant potential limitations for smart grids?

Refer to answer provided under question 2 of this question set.

Question 7: Is a specific licence condition required to ensure that metering data for non-domestic customers can be provided to network operators or DCC, and should any provision be made for charging network operators for the costs of delivering such data?

Refer to answer provided under question 2 of this question set.

Question 8: How can interoperability best be secured in the smaller non-domestic sector?

Refer to answer provided under question 2 of this question set.

CHAPTER 5

Question 9: What steps are needed to ensure that customers can access their data, and should the level of data provision and the means through which it is provided to individual customers or premises be a matter for contract between the customer and the supplier or should minimum requirements be put in place?

No response

Question 10: Do you agree with our approach to data privacy and security for non-domestic customers?

No response

Question 11: Is the proposed approach to rollout (for example in terms of targets and a requirement for an installation code of practice) appropriate for the non-domestic sector?

In general terms ENA member companies believe that the approach to the roll out programme and installation practices should be the same as for domestic installations. There will of course be differences of approach necessary in these types of installation (i.e. approach to multiple retail outlets, isolation to allow installation, retailers etc with multiple outlets).

ENA members are currently considering electricity and gas network issues in these commercial environments which may be different to domestic installations. As commented on elsewhere these points will be collected, documented and issued to training centres etc for use in training installers.

On consideration, whilst a number of issues will be relevant to both domestic and non domestic sectors, ENA believes there should be at least two different installation and

customer codes of practice. This difference should recognise the commercial constraints and installation differences which exist.

ENA member companies will ensure that current, well proven approaches to work conducted on commercial premises are followed, and therefore where network related issues are identified by installers, these should follow the currently agreed process of categorisation for the roll out programme, i.e.:

- Cat A Emergency (contact network operator by phone immediately from site)
- Cat B Non emergency but an issue which prevents the installation from continuing (contact network operator by phone or through existing data flow options – action dependant on site identified risk)
- Cat C Low priority issues or network asset information (Inform network operator through existing data flow options).

Whilst we believe the categories identified above will be appropriate for commercial environments, it is likely that there may be different issues which may prove more difficult to rectify as quickly as would be the case in individual domestic installations.