



Making a positive difference
for energy consumers

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Programme
Department of Energy and
Climate Change

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Dear Jane,

Response to DECC consultation on the arrangements for the adoption, enrolment and churn of foundation meters

We would like to respond to DECC's proposals for SMETS 1 meters to be enrolled into the Data and Communications Company (DCC).

Your consultation seeks views on the proposal that the Secretary of State (SoS) should determine whether to authorise the DCC to proceed with the initial enrolment project based on the findings of the Enrolment Project Feasibility Report (EPFR).

We support the approach for the DCC to prepare an EPFR and for the SoS to take the decision to initiate the process to commence work on the EPFR and to authorise the DCC to implement the enrolment project.

We note that the detailed arrangements to support this will be incorporated into the Smart Energy Code and we look forward to responding to those proposals. In particular we consider that:

- 1) The scope for the EPFR must cover the necessary economic, commercial, technical, security and operational impacts arising from the enrolment of SMETS 1 meters;
- 2) The form of the compliance statement to be provided by the supplier stating that the meter complies with SMETS will be significant as it will be the basis for any future disputes or claims. We support the incorporation into the SEC of the requirement signalled in the original consultation "*The supplier should retain evidence that supports this compliance statement, which must be made available upon request to the SEC Panel and/or Ofgem.*"
- 3) The consultation document described the need for an Enrolled Products List to be maintained by the DCC that will list the meters that suppliers have confirmed as being SMETS 1 compliant and have been enrolled into the DCC. We support this and consider that the Enrolled Products List will have an ongoing function to track firmware management of SMETS 1 equipment.

We also support the proposals that any subsequent enrolment projects for SMETS 1 meters should be considered as SEC modifications.

We welcome DECC's consideration of the issues arising from the churn of enrolled metering systems to non-DCC users. This is a complex issue that will impact consumer during the initial period of live operations. We note that further consultation is planned on whether there is a need for regulation of smart installations after the commencement of live operations by the DCC.

We look forward to continuing our engagement with DECC on developing the regulatory framework to support these arrangements.

If you would like to discuss this response, please contact Laura Nell, laura.nell@ofgem.gov.uk or Nigel Nash, nigel.nash@ofgem.gov.uk.

Yours sincerely,

Rob Church
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