

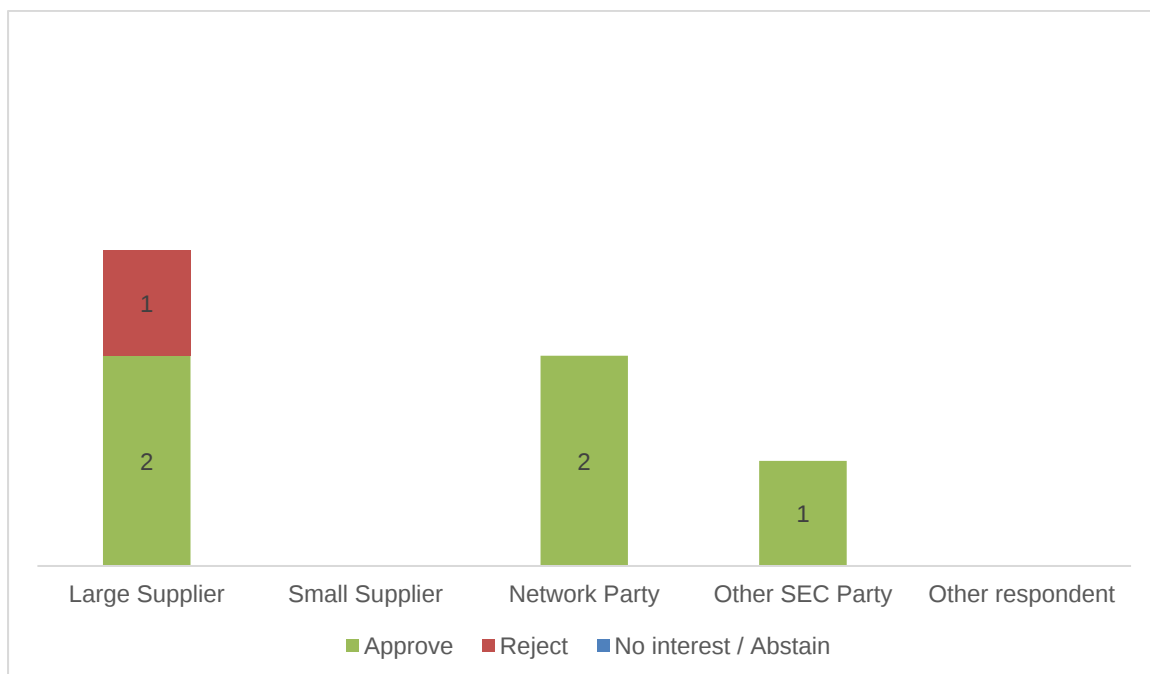
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MP264 ‘Updating Independence of SMDA Testing Provisions’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP264 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP264 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Approve	It makes sense to allow a wider number of parties to bid for the service, especially if that results in lower costs, provided that any potential conflict of interest can be addressed. We agree it better supports General SEC Objective (d).	-
Octopus Energy	Large Supplier	Approve	This modification would facilitate additional options for potentially cost effective and efficient means of providing the assurance needed under the SMDA scheme (facilitating SEC objective A)	-
E.ON Limited	Large Supplier	Reject	We do not agree with the proposal in its current form, as we do not believe it has addressed all the relevant risks. We believe there is a risk of compromising testing of devices, as the modification proposal doesn't outline how robust controls would be applied. For example, there is a possibility that the DCC could test its own comms hubs, or an asset manufacturer could test its own devices under the proposed revision to the SMDA. The modification doesn't detail how key risks have been considered and addressed.	These risks will be considered and included in a competitive procurement process. Party representatives at the SMDA Sub-Committee will be part of the procurement process and the setting out of procurement requirements. It would not be feasible to include the procurement criteria as part of the modification without prior consultation.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Approve	-	-
Scottish and Southern Electricity Networks	Network Party	Approve	This modification will better facilitate SEC objective(d)1 as it will widen the scope of competition and better support the interoperability and interchangeability of SMETS2 Devices.	-
Data Communications Company	Other SEC Party	Approve	DCC believe that by utilising our test laboratories at Brabazon House we could offer a significantly enhanced and cheaper SMDA service that would benefit Smart Meter manufacturers. The test labs at Brabazon can support the testing of Smart Metering technology probably more comprehensively than most facilities in the UK. Should this Modification be approved DCC would be able to present SEC parties the scope of test tools, capabilities e.g. robotics and cost efficiencies, offering advantages to all SMDA parties. DCC believe that they could retain independence and competition between manufacturers and would be keen to further discuss contractual delivery options with SECAS.	-

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	The mod report mentions that one SEC member raised the risk of a conflict of interest if the DCC were to be awarded the contract. We also think there might be a conflict of interest if a Manufacturer were to be awarded to contract. We don't see this as a deal breaker, but the independence of any Testing Provision would need to be assured under the SMDASC.	Any Party bidding into the process that has other conflicting commercial objectives will have to demonstrate their independence to be considered. This will form part of the selection criteria.
Octopus Energy	Large Supplier	-	-
E.ON Limited	Large Supplier	-	-
National Grid Electricity Distribution	Network Party	-	-
Scottish and Southern Electricity Networks	Network Party	-	-
Data Communications Company	Other SEC Party	DCC believe they can offer a compelling bid that could be assessed for cost and quality alongside other providers.	-