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MP270 ‘Enabling DCC to provide SMDA Test House services’

Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

SECAS received four responses to the Modification Report Consultation. Two respondents believed that the modification should be approved, whilst two believed the modification should be rejected. The respondents who believed the modification should be approved did not provide any views on which SEC objective this modification would better facilitate. The Proposer believes this better facilitates¹, however this may change when the Change Board provide its own views.

¹ facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy

Modification Report Consultation responses

Summary of responses

Four responses were received as part of this Modification Report Consultation. Two responses were in favour of the modification being approved. One favourable respondent (Large Supplier) highlighted that the legal text changes proposed would better facilitate the DCC's ability to carry out Smart Metering Device Assurance (SMDA) Testing, if the Service contract is awarded to the organisation.

One respondent (Other SEC Party) highlighted that the legal text, in its current form was not robust enough and raised a number of concerns. One such concern relates to the testing of Communications Hubs, which would be a conflict of interest, should the DCC be awarded the contract. This concern was highlighted by the DCC when the modification was raised, and the organisation was transparent about this in its own tender response. How the DCC will mitigate against this possible conflict of interest has been described in the tender, and the Smart Metering Device Assurance Sub-Committee (SMDASC) will have a clear view of how the company will remain independent.

Another concern raised related to the policy that the DCC will draft as part of its SMDA Testing Service. It is worth noting that this policy would be drafted in liaison with the SMDASC and will be subject to the Sub-Committee's approval. The scope of SMDA Testing will also be defined as per the SMDA.

A final concern was raised by this respondent around terminology – Testing Participants are mentioned within the SEC at various points, and there is a concern that it would add unintentional requirements on SMDA Testing Participants. The legal text drafting was discussed with the SMDASC Chair, and the redlined proposed changes specifically mention 'Testing Participants in respect of SMDA DCC Testing' and therefore do not apply to Testing Participants outside of SMDA DCC Testing.

A further comment was made by a respondent (Large Supplier), expressing that SMDA Testing should be non-biased, and testers should have distance and independence from the Devices that they are assessing. The independent aspect of DCC SMDA Testing has been detailed in the DCC's tender response for the SMDASC to review.