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Paper Reference:	SECP_128_2805_10
Action:	For Decision
<u>Acronyms and Defined Terms SEC Glossary</u>	

DENSNZ Consultation – Smart Secure Electricity System Implementation

1. Purpose

A response to the DENSNZ consultation on Smart Secure Electricity System Implementation, is contained in the Annex to this paper.

We request the Panel review and approve the draft response. A copy of the consultation document can be found [here](#).

The consultation closes 11 June 2024.

2. Recommendations

The Panel is requested to:

- **NOTE** the contents of this paper; and
- **AGREE** the draft Panel response be submitted to DENSNZ subject to any final comments to be received by 4 June 2024, and final agreement with the Panel Chair.

Tim Newton

SECAS Team

20 May 2024

Attachments

Annex 1: Draft SEC Panel Response – Smart Secure Electricity System Implementation

Annex 1 – Draft Panel Response

Angela Love SEC Panel Chair
Smart Energy Code Company Limited
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DESNZ via email
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XX June 2024

DESNZ Consultation – Smart Secure Electricity System Implementation

Dear Sir / Madam,

The Smart Energy Code (SEC) Panel is pleased to respond to the recent consultation on the proposals for the Smart Secure Electricity System Implementation. Whilst the proposals in the consultation do not directly impact the SEC, there are issues the consultation raises that we have commented upon to provide insight and we hope assist development.

As noted in our response to the July 2022 consultation, we are supportive of the proposals to introduce standards to deliver interoperability and provide consumer confidence to engage with this growing market. We agree with the proposals to introduce standards for Energy Smart Appliances (ESA) and the proposals to introduce licensing of organisations undertaking load control activities. This seems a sensible step, in relation to the potential risks.

The proposal to establish a working group to develop the tariff data standard, is a pragmatic approach.

The proposals for the scope of the arrangements proposed for Technical and Security governance seem broadly sensible. Our response to the July 2022 consultation, called for further clarity on the scope of the requirements, which these proposals provide. We note the similarities to the Smart Metering Implementation Programme, (SMIP) governance, that Government will initially manage the Technical and Security Forums before handing over to industry. The parallel activity across government and Ofgem Code Reform transition timelines, may provide an opportunity to align that handover.

Following the Ofgem Code Reform implementation consultation earlier this year, we understand there will be changes in the way the new Code Managers undertake engagement with their stakeholders. We expect this approach to be applied in the development of the arrangements for Technical and Security governance.

We remain committed to ensuring the substantial consumer investment in the DCC and support for exploitation of the Smart Energy governance framework to extract maximum value for consumers. As a result, there are questions as to potential impacts the operations of load control and ESA may have in future to the SEC and or DCC services. For example, how the control of ESA appliances continues to align with the operation of the smart meter, any potential impacts to overall network traffic and whether there may be a move to record consumption at less than 30-minute intervals to support the evolution of load controller and ESA service providers. We would be happy to discuss this area further and how learning and experience from smart metering Technical and Security Governance frameworks may be applicable.

If you would like to discuss any of the issues discussed further, please do not hesitate to contact me at SECAS@gemserv.com.

Yours faithfully,

Angela Love
SEC Panel Chair

DRAFT