

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

MP111 ‘SMDA Budget Amendments’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP111 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	Bringing SMDA under the SEC will allow for a more effective delivery of device interoperability assurance through the inducement of full cross-market participation.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	SMDA provides a service to the industry testing interoperability. It's critical to all industry parties and consumers that devices are interoperable and continue to be after firmware upgrades.
NMi Certin	Other SEC Party	Yes	Provides the most economic and equitable option to ensure the objectives and benefits of the SMDA are maintained on an enduring and independent basis.
Calvin Capital	Other SEC Party	Yes	We see this as the best way to ensure that the SDMA scheme is funded into the future and can provide an independent assurance scheme for smart devices, as set out as a key recommendation from the National Audit Office testing review.
CMAPI representing Meter Asset Providers	Trade Association	Yes	We see this as the best way to ensure that the SDMA scheme is funded into the future and can provide an independent assurance scheme for smart devices, as set out as a key recommendation from the National Audit Office testing review.
BUUK Infrastructure Limited	Networks Party	Yes	Resolving the funding issues with the SMDA scheme will help ensure that smart meters meet the required specification and perform as intended. This will ensure that the functionality that is expected from smart meters and outlined within the SEC can be achieved. Not including the SMDA scheme within the SEC governance arrangements from the outset was a mistake that has risked the initial phase of the smart meter deployment. The logic for the current funding mechanism of the SMDA is flawed as there are insufficient devices to test to make it viable. Addressing this shortcoming with a scheme that is otherwise useful and beneficial to the industry is therefore something that we support.

Question 1			
Respondent	Category	Response	Rationale
EUA	Other SEC Party	Yes	This solution will provide long term financial stability for the scheme while also providing the appropriate governance through the SEC Panel / sub group to allow the scheme to adapt and meet the future requirements as they develop.
EDF	Large Supplier	Yes	SMDA will benefit all SEC Parties, so we agree that the fixed costs should be fairly shared across SEC Parties. In addition, Parties will have the option to provide guidance and contribute to the running of the scheme in order to ensure it is cost effective and fit for purpose.
OVO	Large Supplier	Yes	OVO fully support and feel the solution best addresses the issue raised.
EON	Large Supplier	Yes	This is the best way to ensure the long term funding of SMDA so that the SMDA scheme can continue to provide independent assurance on Smart Devices, and enable the scheme to be at the forefront of asset testing, as opposed to awaiting funding to arrive before testing can begin.
Utilita	Large Supplier	Yes	<p>Changing the funding and governance of SMDA Smart Metering Device Assurance is a step in the right direction towards achieving all the necessary testing around interoperability and interchangeability.</p> <p>This solution is expected to have a clear benefit for Energy Consumers by resolving device or firmware issues efficiently for more devices/device combinations; ideally this happens before these devices enter Consumers' premises. Preventing the inconvenience of site-visits, exchanges, and the distress of experiencing issues with their Smart Metering device is a high priority for Utilita.</p> <p>We agree with the solution to bring the SMDA Scheme under the SEC Panel.</p> <p>Bringing SMDA management under the SEC offers the potential to:</p>

Question 1			
Respondent	Category	Response	Rationale
			<ol style="list-style-type: none"> 1. Provide for the wider Smart Energy arrangements thereby increases the possibilities for in depth and full testing on devices interoperability (especially further testing of prepayment) to ascertain if devices (and firmware) are fit for purpose. 2. Further funding options to support the work of SMDA which as a result can increase the longevity of this Scheme. 3. Increase the potential for SEC Parties to work together on addressing concerns around device and firmware especially for gaining suppliers. This is important to reach a higher level of confidence that devices are working as they should. 4. Increases awareness and party involvement in the scheme. <p>An opportunity to consider including testing other devices within SMDA e.g. CHs devices.</p>
UK Power Networks	Network Party	Yes	<p>The proposed solution for the SMDAco Board to become a SEC panel Sub-Committee and the SMDA Management Panel (SMDAMP) to become a sub-group of the SMDASC will provide oversight and governance through SEC and ensure suitable funding is available for their work.</p> <p>Consideration should be given to reviewing the group structure for overseeing/managing the testing regimes to include an input from Network Operators especially if they become liable to contribute to the SMDA through SEC.</p>
Centrica	Large Supplier	Yes	We believe that the solution is an appropriate and proportionate solution to the issue presented.
DCC		No	Whilst recognising that the proposed solution amends the SMDA funding model as per the NAO's recommendations, DCC questions whether the current scheme operated by SMDA fully meets the needs of industry. Whilst it is the assurance solution developed and

Question 1			
Respondent	Category	Response	Rationale
			<p>operated by larger SEC Parties and their Device Manufacturers and financiers, it has not achieved significant engagement for Energy Suppliers, Device Manufacturers or Meter Asset Providers. DCC notes that criticism of aspects of the design and operation of the scheme has been expressed by a number of stakeholders and considers that a broader debate may be needed to ensure the long-term assurance solution meets the needs of the industry prior to the changes proposed being implemented.</p> <p>The proposed solution also does not address the issue of the SMDA being voluntary. Current assurance (notwithstanding that it is only partial) covers a small subset of Devices in production. Failure to consider the variable cost element, which DCC consider to be a barrier to participation, means that a fundamental issue of the SMDA is not adequately addressed.</p> <p>DCC is concerned that addressing the funding challenges of a competitive service that is not currently economically sustainable may obviate the need to address the reasons why the scheme has failed to deliver. Therefore, DCC believe that further rationale is required to evaluate why the original funding model has failed, in order to ensure that any fundamental issues do not perpetuate should mandatory funding for all Suppliers be introduced.</p> <p>DCC also notes that the proposed structures (SMDASC and SMDAMP) do not address one of the current issues with the scheme in that the representation does not cover the whole industry. The SMIP has objectives that are broader than supplier and asset provider related, and the proposed solution limits representation to Energy Suppliers, Meter Manufacturers and Meter Asset Providers. One of the roles of the Sub-Committee is to manage the risks and issues associated with the delivery of SMDA. DCC considers that the interests of SEC Parties not represented by the SMDASC or SMDAMP (e.g. Other SEC Parties (such as DCC or other DCC Users) or Network Parties) are not considered in the decisions made by the groups.</p>

Question 1			
Respondent	Category	Response	Rationale
			DCC also considers that the market design intended for device assurance is to be a competitive service, and notes that alternative options are emerging, however, this proposal seeks to embed SMDA as the only option for device assurance. Furthermore, DCC requests further information on the proposed solution in relation to the charging model. More detail can be found in the responses to the questions below.
SSEN	Network Party	No	SSEN understand the need to change the funding model and agree with the NAO report conclusion, that the funding model needs to change to support the ongoing viability of the scheme. The current scope of SMDA testing however does not adequately cover/test, the key issues SSEN are seeing in the live environment. SSEN believe that the scope of testing needs to change if Network Parties are to be included in DCC Charges moving forward as part of this modification being approved.
WPD	Network Party	No	We agree with the NAO report findings that identified the SMDA funding model requires addressing, and the intent of this modification to do just that. However, we do not agree that the scheme currently addresses the issues that Western Power Distribution are seeing in the live environment. As a result we do not agree that DNOs should be expected to be representatives on the Sub-Committee, or be required to pay for a scheme that doesn't benefit them.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	No	We believe a thorough review of the SMDA Scheme is needed before considering an alternative funding model. The concept of the Scheme is good and there are potential benefits if used properly. However, both awareness and use of the Scheme do not seem widespread. Without extensive coverage the Scheme's benefits are limited and this is unlikely to be improved by changing the funding model and governance alone.

Question 1			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	No	<p>Whilst we are supportive of moves to ensure devices are properly tested before being installed in customers premises there are some significant considerations:</p> <ol style="list-style-type: none"> 1) The energy suppliers have a licence obligation to install meter devices which “has the functional capability specified by and complies with the other requirements of that Version of the SME Technical Specification”. Incorporating the funding of the SMDA in the SEC means that DNO’s are then contributing 6% of the annual cost of the SMDA funding (6% of estimated £700k per annum based on current SMDA scope). We request that these charges are ring fenced for the Supplier Party Category only. 2) The SMDA is currently a voluntary scheme and has no ‘teeth’ to prevent a Supplier installing a meter which has not fully passed all testing. The consultation moves the funding arrangements under the SEC but does not provide any additional powers to the SMDA – perhaps it should do? 3) The SMDA remit has been to “provide assurance testing of smart metering equipment covering both interoperability and interchangeability of the Devices”. This does not however mean that the SMDA tests all of the device functionality only that the device can properly switch on a Change of Supplier. <p>If the scope of the SMDA testing were to be widened there would be less device issues encountered in ‘Live’ but the costs of providing the assurance would likely rise exponentially. Refer back to our consideration under bullet point 1).</p>

Question 2: Will there be any impact on your organisation to implement MP111?

Question 2			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	No	We already participate fully with the scheme
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	We've supported SMDA over a number of years. SMDA's financial security is important to us. We will have a small impact in accessing the SMDA services.
NMi Certin	Other SEC Party	Yes	Confidential response provided
Calvin Capital	Other SEC Party	No	-
CMAP representing Meter Asset Providers	Trade Association	No	-
BUUK Infrastructure Limited	Networks Party	Yes	The costs our electricity licenced businesses incur via the DCC will increase.
EUA	Other SEC Party	Yes	EUA members include Meter Installers, MAPs, Device Manufacturers and Suppliers and therefore utilise SMDA to a greater or lesser amount for Device Assurance, but all the comments to date from our members are supportive of the proposed modification.
EDF	Large Supplier	Yes	Manufacturers should see reduced test fees due to the removal of fixed costs, which should then reduce the barriers to their using the scheme. As this evolves, we anticipate this have a positive impact on suppliers own testing requirements.
OVO	Large Supplier	No	As an existing full SMDA member, any potential impact, currently thought to be none, will be positive and to our overall benefit.

Managed by



Question 2			
Respondent	Category	Response	Rationale
EON	Large Supplier	Yes	Confidential response provided
Utilita	Large Supplier	Yes	<p>A positive impact of implementing MP111 is that it creates opportunities for testing interoperability in more devices and firmware; this is currently restricted for reasons of cost and limited coordination while SMDA is outside the SEC. As a result, we expect to see increased testing and output from these devices/firmware tests. This will be useful towards providing substantial evidence around potential device issues, helping to manage or prevent the release of devices into live production prematurely.</p> <p>The impact of having SMDA under the SEC could mean there are less issues with firmware and devices in DCC's live systems in the near future and will likely lead to a greater understanding of CoS gained devices which have not been procured and installed by the Energy Supplier. Most suppliers focus on testing their own devices but we are in a market where the testing of other meters CoS gained is unknown to the gaining supplier.</p>
UK Power Networks	Network Party	Yes	<p>UK Power Networks is currently a joint subscribing member of the SMDA through the industry body ENA representing Network Operators. Membership of the SMDA is not a requirement for Network Operators but this proposal will result in an obligation on UK Power Networks to contribute towards the funding of the ongoing fixed costs of the SMDA scheme where individual membership costs may increase for Network Operators.</p> <p>At this point, there is no foreseeable impact on implementation effort impact beyond the increased costs stated above.</p>
Centrica	Large Supplier	Yes	<p>British Gas is one of the few supplier members of the SMDA scheme and has, over the years, have made a significant financial commitment to the scheme. This has ensured that the scheme has remained operational / viable, that meter manufacturers have been able to obtain SMDA assurance and subsequently all suppliers have benefited from this. Implementation will help to ensure that all supplier parties are able to be involved in SMDA</p>

Question 2			
Respondent	Category	Response	Rationale
			governance arrangements and that the fixed cost element of the scheme is equitably recovered.
DCC		Yes	<p>We publish annual Charging Statements which set out the charges that are applicable for the effective Regulatory Year. The proposed solution seeks to introduce a new Explicit Charge to be payable to DCC (set out in Annex C of the modification report). It is important to note that it can take some months to set up processes internally to introduce new chargeable services and to make the necessary changes to the Charging Statement in accordance with our Licence.</p> <p>The Modification Report does not include details on whether the proposed new Explicit Charge would be “set” annually, or “indicative” based on a quote from SMDA at the time of ordering. We also note that this proposal is not set out in this consultation summary document and implies nil impact on DCC.</p> <p>By way of context and background “set” Explicit Charges are levied as and when those products/services are used and are predefined in the Charging Statement. “Indicative” Explicit Charges are for products/services which depend on a number of variables which are only known at the point of ordering. To assist customers, DCC sets indicative ranges of these charges in the Charging Statement.</p> <p>DCC also notes that the proposed solution does not detail which DCC Users will be required to pay the new Explicit Charge and how this Explicit Charge will be determined. I.e. will all DCC Users pay this charge or will only DCC Users using the SMDA service be charged and is the charge variable for each customer or set? The proposed solution also does not specify when the charges are incurred. I.e. at the beginning of the RY or upon ordering of the service.</p> <p>DCC therefore requests that further information is provided on the charging requirements in order to understand the full impacts to DCC.</p>

Question 2			
Respondent	Category	Response	Rationale
SSEN	Network Party	Yes	New DCC charges to assist in the ongoing funding of SMDA.
WPD	Network Party	Yes	If this modification is approved there will be impact with DNOs needing to be representatives on the Sub Committee. As yet we do not understand how this would work and therefore cannot confirm the specific impacts to Western Power Distribution.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	Yes	Currently neither Haven Power nor Opus Energy are members of the SMDA Scheme and therefore Drax Group is not incurring charges. Should MP111 be implemented, all suppliers will be required to fund the ongoing fixed costs of the SMDA Scheme regardless of whether they use or benefit from it.
Electricity North West	Network Party	-	-

Question 3: Will your organisation incur any costs in implementing MP111?

Question 3			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	No	We have already incurred significant cost as a result of our participation in the scheme since its inception. We do not expect these costs to increase further as a result of the implementation of MP111.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	If this modification isn't implemented, we will have to look at how we can achieve the same assurance elsewhere which is likely to have a financial impact.
NMi Certin	Other SEC Party	Yes	Confidential response provided
Calvin Capital	Other SEC Party	No	-
CMAP representing Meter Asset Providers	Trade Association	Potentially	Those MAPs who are currently members of the SMDA scheme will no longer pay the membership fee for the scheme and therefore there will be a cost saving for those particular companies that will no longer be inequitably passed into the supply chain.
BUUK Infrastructure Limited	Networks Party		<p>These will depend upon the split of costs between suppliers and network operators for fixed costs within each year. Our costs will be in line with our market share as an electricity network operator.</p> <p>We would challenge the logic of electricity distribution network operators funding the SMDA scheme. Ensuring metering device compliance with SMETS, GBCS and SEC obligations is the requirement of the supplier and not the electricity distributor. Funding for the scheme therefore should be applied to the party responsible. Funding via network operators will eventually be passed onto suppliers via Use of System charging so the logic of splitting these costs and not allowing suppliers see the full cost of the scheme is not unclear. Network providers are not involved in the current SMDA scheme and are unlikely to be</p>

Question 3			
Respondent	Category	Response	Rationale
			going forward, therefore the logic of funding incentivising representation in the governance arrangements would not seem to be valid
EUA	Other SEC Party	-	N/A
EDF	Large Supplier	No	As mentioned in the question apart from our central share, and the transition period where we will still be testing at the same rate as in the past 4 to 5 years, we anticipate no additional costs.
OVO	Large Supplier	No	We already pay for SMDA outside of the proposed solution.
EON	Large Supplier	Yes	Confidential response provided
Utilita	Large Supplier	Yes	Utilita will incur costs, the exact amount is currently unknown, as the estimated costs are based on the defined scope of testing and the facilities for testing available (e.g. use of different test labs). But the potential benefits of developing the SMDA Scheme are likely to outweighs costs (assuming costs remain reasonable, fair and proportionate for SEC Parties). This should instead be seen as an opportunity to improve cost control through the support of stronger governance.
UK Power Networks	Network Party	Yes	Further to our response to question 2, the proposal document advises of estimated costs of £500K to £700K to cover fixed costs, System Operator Costs and Test House Costs. There is no indication of the level of fixed ongoing costs that will be charged to Network Operators so we are unable at this stage to provide feedback to this question. If the proposed solution is approved then charges should be fair and proportionate as the solution is addressing Supplier Licence Obligations.
Centrica	Large Supplier	No	We will not incur any implementation costs. The ongoing fixed costs of running the scheme will be recovered through DCC charges so we will incur our relevant proportion of these cost (in a fair and equitable way).

Question 3			
Respondent	Category	Response	Rationale
DCC			As previously mentioned, in order to implement MP111 DCC will be required to re-issue the Charging Statement. Whilst this is undertaken on an annual basis, if the Modification Proposal is implemented following the publication of the Charging Statement on 1 April 2021, then DCC will need to re-open the Charging Statement in-year during RY 2021/22. This requires a formal 3-month notice period and engagement with industry on the proposed new charges in accordance with the Licence. Further to the above DCC will also need to amend its billing system and monthly charging process to accommodate this change. Further details are required to impact assess appropriately and DCC requests that a DCC Preliminary Assessment is requested once the requirements have been agreed.
SSEN	Network Party	Yes	SSEN are unable to provide estimated costs for this modification as the breakdown of costs that would be applicable to each Network Party are not clear at this time.
WPD	Network Party	Yes	We are unable to confirm exactly what costs we might incur as the modification is unclear on what the charges will be and how they are split. Also it is not yet fully understood how the DNO representation will be decided so there is potentially resource required for this.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	Other than our share of the central costs, we do not expect to incur additional costs as a result of MP111.	MP111 is not seeking to review the Scheme to see how it can be enhanced to drive greater value. We therefore do not anticipate any cost savings to our organisation as a result of this modification,

Question 3			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	-

Question 4: Do you believe that MP111 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	We agree with the report that this will better facilitate SEC Objective (a), because assurance of device interoperability is an essential aspect of the efficient and effective rollout of smart meters to deliver the intended consumer benefits.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	We agree with the proposer, as set out in the Modification Report, that the Modification better facilitates SEC Objective (e) as it will ensure Device manufacturers innovate to ensure the development of Devices makes them interoperable and interchangeable.
NMi Certin	Other SEC Party	Yes	The recommendation seeks to implement the key output from the independent study of the SMDA arrangements following the NAO report. These are noted as being necessary to embed interchangeability and interoperability into smart metering arrangements governed by SEC.
Calvin Capital	Other SEC Party	Yes	This modification better facilitates SEC Objective (a) as it will ensure Devices are compatible with each other to prevent communication problems and device replacement. We also agree with the proposer, as set out in the Modification Report, that the Modification better facilitates SEC Objective (e) as it will ensure Device manufacturers innovate to ensure the development of Devices makes them interoperable and interchangeable.
CMAA representing Meter Asset Providers	Trade Association	Yes	This modification better facilitates SEC Objective (a) as it will ensure Devices are compatible with each other to prevent communication problems and device replacement. We also agree with the proposer, as set out in the Modification Report, that the Modification better facilitates SEC Objective (e) as it will ensure Device manufacturers innovate to ensure the development of Devices makes them interoperable and interchangeable.

Question 4			
Respondent	Category	Response	Rationale
BUUK Infrastructure Limited	Networks Party	Yes	<p>A resilient, robust and functioning SMDA scheme should ensure meters are compliant with the requirements of the SEC. Therefore we believe that this modification will better facilitate:</p> <ul style="list-style-type: none"> a The efficient operation and interoperability of smart metering systems c Facilitate energy consumers management of their use of electricity and gas by providing confidence that the smart meter is functioning correctly d Help facilitate competition between suppliers by providing confidence that smart meters gained via a change of supplier will function correctly and not need replacement
EUA	Other SEC Party	Yes	<p>If MP111 is progressed, with the associated stabilisation of the scheme more devices will move through the process and become assured and therefore SMDA will directly supports a number of General SEC Objective (1,3 and to a degree 2). As the number of meter manufacturers/meter models increase within SMETS2 and with the levels of churn of customers between Suppliers, having a singular independent scheme to validate interoperability and interchangeability is will be efficient and cost effective</p>
EDF	Large Supplier	No	<p>We agree that this change would better facilitate SEC Objective (a) as it would support the interoperability of smart metering systems.</p> <p>We do not agree with the proposer that this change better facilitates SEC Objective (e) as SMDA and device has no direct impact on energy (i.e. gas and electricity) networks.</p>
OVO	Large Supplier	Yes	<p>We believe this proposal will meet SEC Objectives (a) and (e) as set out in the Modification Report.</p>
EON	Large Supplier	Yes	<p>This facilitates:</p> <ul style="list-style-type: none"> a) As it will ensure and demonstrate that devices are interoperable with each other to avoid any interoperability issues. e) ensures device manufacturers innovate to ensure the development of new devices also means that they are interoperable and interchangeable.

Question 4			
Respondent	Category	Response	Rationale
Utilita	Large Supplier	Yes	MP111 better facilitates SEC Objective (a) as increased funding should lead to more robust testing and longevity of the SMDA Scheme. By SEC supporting the work of SMDA this will lead to efficient operations and interoperability of Energy Consumers Smart Metering Systems.
UK Power Networks	Network Party	Yes	In general, this proposal will support the SEC objectives requiring device manufacturers to ensure devices are compatible with each other and to be interoperable and interchangeable.
Centrica	Large Supplier	Yes	<p>We agree with the Proposer in that this modification better facilitates SEC Objective (a), to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain, as it will ensure Devices are compatible with the Total System (interoperable) and each other (interchangeable) and this will help to prevent operational issues with installed devices. We also agree with the Proposer that this modification better facilitates SEC Objective (e), as it will ensure Device manufacturers innovate to ensure the development of Devices makes them interoperable and interchangeable.</p> <p>In addition, we believe that implementation of this modification proposal would better facilitate SEC Objective (d), to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy, by ensuring that all supplier parties have access to the SMDA governance arrangements and that fixed costs are shared in a fair and equitable manner between all suppliers. This will avoid SMDA supplier members effectively cross subsidising non-SMDA supplier members and therefore facilitate effective competition.</p>
DCC		No	DCC considers that the proposed solution does not better facilitate the General SEC Objectives because it does not address those issues highlighted in DCC's response to question 1 of this consultation.

Question 4			
Respondent	Category	Response	Rationale
			DCC also notes that the modification may be inconsistent with SEC General Objective (d). The objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy. DCC considers that subsuming the SMDA into the SEC would not directly prevent competition, but since SEC Parties will effectively be funding the SMDA through the SEC, there may be limited value in considering any competitive service.
SSEN	Network Party	No	A change in the funding of the model will allow a continuation of the scheme. Without a change in the scope of testing along with the level of compliance required to pass when testing devices, SSEN do not believe this will improve the output of the SMDA and better facilitate general SEC Objectives.
WPD	Network Party	No	We agree that a change in funding for the scheme is required and would allow the scheme to continue. However, as there is no proposed change to the scope, then we don't believe that the modification as it currently stands better facilitates any of the SEC Objectives.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	No	There are issues that need to be tackled, as part of a wider review, to secure an enduring Scheme that delivers the necessary test assurance. MP111 seeks only to change the funding and governance of the SDMA Scheme. We do not believe this alone will better facilitate the General SEC Objectives.
Electricity North West	Network Party	No	See our response to Q1

Question 5: Noting the costs and benefits of this modification, do you believe MP111 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	Implementing this modification will actually make the scheme more cost effective.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	This will ensure the ongoing viability of the SMDA scheme that was recognised as an essential element of the overall testing arrangements for smart metering within the National Audit Office review. It is also essential to MAPs and Suppliers to ensure that their obligations are met.
NMi Certin	Other SEC Party	Yes	Confidential response provided
Calvin Capital	Other SEC Party	Yes	This will ensure the ongoing viability of the SMDA scheme that was recognised as an essential element of the overall testing arrangements for smart metering within the National Audit Office review into testing. It meets SEC Objectives.
CMAPI representing Meter Asset Providers	Trade Association	Yes	This will ensure the ongoing viability of the SMDA scheme that was recognised as an essential element of the overall testing arrangements for smart metering within the National Audit Office review into testing. It meets SEC Objectives.
BUUK Infrastructure Limited	Networks Party	Yes	The change will help ensure that smart meters meet the required specifications and work as expected. This will benefit, suppliers, network operators, other users and consumers. We would like to see the funding arrangements for SMDA re-visited and costs only applied to suppliers.
EUA	Other SEC Party	Yes	SMDA has been set up to provide assurance across the industry that smart meter equipment will work effectively in the smart environment. There is an increasing variety of meter manufacturers/meter models within SMETS2 and with the levels of churn of

Question 5			
Respondent	Category	Response	Rationale
			customers between Suppliers, having a singular independent scheme to validate interoperability and interchangeability is important (and cost effective).It is noted that the scheme is a voluntary scheme, but as observed within the independent report conducted by BEIS (following the NOA report), the Large and Small Suppliers contacted along with the MAPs, stated they utilise the scheme to provides assurance of both interoperability and interchangeability of those Devices they are accountable for. The current SMDA funding model was developed for the scheme based on a number of assumptions, which have not all materialised (they included the DCC systems, comms hubs and end to end solution would be fundamentally stable and work as specified, comms hub functionality would be identical across regions/variants, there would be a number/volume of devices through the scheme, etc) and therefore this modification proposal will provide the financial security required for the scheme to progress and support the industry requirements.
EDF	Large Supplier	Yes	We are currently one of the lead contributors in terms of time and effort to set up and run the SMDA scheme, as well as providing considerable financial support to the scheme to date. This investment has benefited the industry as a whole. This modification would ensure that the costs of the SMDA scheme, which benefits all SEC Parties, will be more fairly distributed across SEC Parties. In addition, this approach also helps to ensure longevity of the scheme, which we hope will provide additional parties with the incentive to use it to test smart metering devices.
OVO	Large Supplier	Yes	The benefits of including this under the SEC Panel far outweigh any costs.
EON	Large Supplier	Yes	This will ensure the continued funding and operation of the SMDA scheme that is essential for the testing of smart metering equipment. This is also the view of the National Audit Office from their review into testing.

Question 5			
Respondent	Category	Response	Rationale
Utilita	Large Supplier	Yes	Please see Question 1 for a list of the benefits.
UK Power Networks	Network Party	No	<p>In considering the costs and benefits point alone, we believe this proposal should not be approved because network customers will ultimately become liable for the SMDA fixed ongoing costs charged to Network Operators that are associated with a requirement for Energy Suppliers meeting their own Licence Obligations.</p> <p>Alternatively, other funding models should be considered that do not result in network customers being impacted with a Supplier cost.</p>
Centrica	Large Supplier	Yes	Implementation will ensure that the SMDA scheme remains viable and delivers a benefit to the smart programme. Costs of the scheme will be appropriately covered by benefiting parties, such as suppliers, whilst test fees remain with those organisations that submit devices for testing. The scheme will also support all suppliers in compliance with their testing obligations set out in the SEC (e.g. SEC Section F4).
DCC		No	DCC considers there to be minimal benefits unless the issues identified in DCC's response to question 1 of this consultation are addressed.
SSEN	Network Party	No	<p>Whilst we understand the reasons for changing the funding model for SMDA, paying/incurred any of these costs whilst the scope doesn't provide any benefits to Network Parties and its customers, we do not believe this modification should be approved.</p> <p>SSEN would be happy to evaluate this in the future to include Network Parties in the funding model if the scope can be extended to include SMDA testing that would provide DNO compliance testing which would benefit its customers.</p>
WPD	Network Party	No	Whilst we understand the reason for needing to change the funding, Western Power Distribution believe that the scope of the scheme needs to be extended to benefit both the DNOs and their customers.

Question 5			
Respondent	Category	Response	Rationale
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	No	If SMDA funding received to date has not been enough to cover the costs of running the Scheme, we would question whether the costs of the Scheme outweigh the benefits. As such, the Scheme should be reviewed to see how it can be enhanced to drive greater value and awareness, and therefore more uptake. Until that happens, the charges should not be arbitrarily levied on the wider industry who make little or no use of it.
Electricity North West	Network Party	No	See our response to Q1

Question 6: How long from the point of approval would your organisation need to implement MP111?

Question 6			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Immediate	Implementation has no impact on our SMDA-related activities.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Immediate activation	We can adapt quickly to any new ways of working with SMDA and see this as minimal change to our organisation.
NMi Certin	Other SEC Party	As swiftly as possible	Confidential response provided
Calvin Capital	Other SEC Party	No lead time required	-
CMAF representing Meter Asset Providers	Trade Association	No lead time required	There may be a minimal time to administer the membership activities highlighted in Q2, but it is expected that any changes can be applied in advance of or retrospectively to the Implementation Date.
BUUK Infrastructure Limited	Networks Party	None	This change will not require any system or process changes for us. It only amends the costs we will incur from the DCC.
EUA	Other SEC Party	-	N/A
EDF	Large Supplier	We would not need any lead time for this	No changes required

Question 6			
Respondent	Category	Response	Rationale
		change to be implemented.	
OVO	Large Supplier	No lead time required.	No work is required by us, as a DCC User, or SMDA Member, for this Mod to be implemented.
EON	Large Supplier	No lead time.	It is not to be implemented by a supplier.
Utilita	Large Supplier	N/A	-
UK Power Networks	Network Party	Immediate	The proposed structure and governing body membership of the SMDA sub-committee does not include Network Operators so if this proposal was to be approved we do envisage activities that we would need to complete for this change. We already have a process in place for managing payment of contributions to the SEC and DCC so do not expect to see any changes with that other than an increase in our contribution payments, however internal approval is likely to be required for the increased level of funding.
Centrica	Large Supplier	No lead time required	There is no implementation effort for supplier parties.
DCC		TBC	For the reasons outlined in response to questions 2 and 3, DCC is unable to confirm the lead times associated with MP111. DCC requests further information on the charging requirement prior to providing an Impact Assessment.
SSEN	Network Party	Unknown	Not knowing the true costs at this point, SSEN are unable to estimate the implementation timeframes.
WPD	Network Party	N/A	-

Question 6			
Respondent	Category	Response	Rationale
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	We agree with the timescales proposed.	MP111 will not impact us from a resource perspective or require system changes.
Electricity North West	Network Party	-	-

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	-
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	SMDA Board and Management Panel would become another subgroup of SEC Panel. The model has worked successfully for other groups and we expect the integration to be relatively easy to implement.
NMi Certin	Other SEC Party	Yes	Confidential response provided
Calvin Capital	Other SEC Party	Yes	-
CMAP representing Meter Asset Providers	Trade Association	Yes	-
BUUK Infrastructure Limited	Networks Party	No	<p>The proposed governance arrangements for the SMDA seem overly complex and to be a simple carry over from the current arrangements. These arrangements are necessary as SMDA is a separate legal entity and therefore requires a company Board. In the proposal this would cease and the corporate functions of SMDA would be subsumed into SECCo.</p> <p>Therefore, the governance arrangements should be amended to become more efficient and representative of SEC parties.</p> <p>The SMDA sub-committee should be disbanded and its functions of overseeing the test house contract taken on by the SECCo Board.</p> <p>The SMDA Management Panel should report directly to the SEC Panel and be responsible for the performance of the SMDA scheme. Membership of this group should be reviewed and reflect those SEC parties that may be interested in the scheme. The current</p>

Managed by

Question 7			
Respondent	Category	Response	Rationale
			<p>membership of this group is determined by who funds the SMDA, this should be changed take account of all SEC parties.</p> <p>The roles of the SEC Panel and SEC Board did not also seem accurate from the consultation. The SEC Panel should be responsible for the performance of the SMDA scheme and use the SMDA Management Panel to help deliver this.</p> <p>The SECCo Board should be responsible for contracting with the SMDA test house.</p>
EUA	Other SEC Party	Yes	As outlined above, particularly Q5
EDF	Large Supplier	Yes	We agree that, if approved, this change should be implemented one working day after decision as part of an ad-hoc SEC release.
OVO	Large Supplier	Yes	N/A
EON	Large Supplier	No	<p>While we agree with the vast majority of the proposal, it (in its current form) omits MAPS from access to the SMDA output, and MAPS are a large contributor and beneficiary of the scheme as it is currently.</p> <p>The solution needs to account costs in proportion across suppliers and MAPs, so that all contribute fairly and benefit.</p>
Utilita	Large Supplier	Yes	Utilita appreciates the decision towards the creation of an ad-hoc release for January 2021, this should best enable SMDA to progress in further testing and work towards a new budget as soon as possible.
UK Power Networks	Network Party	Yes	Approval of the SEC budget in January 2021 to include running costs for the SMDA scheme is agreeable. However, we believe Network Operators should not be contributing to the SMDA which addresses Supplier Licence Obligations, and would mean the end customer's network portion of their bill incorrectly increasing.

Question 7			
Respondent	Category	Response	Rationale
Centrica	Large Supplier	Yes	As a text and governance only change, we believe the implementation approach is appropriate.
DCC		TBC	For the reasons outlined in response to questions 2 and 3, DCC is unable to agree or disagree with the proposed implementation approach. DCC requests further information on the charging requirement prior to providing an Impact Assessment.
SSEN	Network Party	Yes	SSEN agree with the implementation approach with regards to the requirement for funding for the 2021/22 financial year.
WPD	Network Party	Yes	We agree that the funding for the scheme should be changed sooner rather than later.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	Yes	If MP111 is approved, it is appropriate that costs for running the SMDA Scheme are included in the January 2021 SEC budget consultation for clarity and to afford SEC parties an opportunity to scrutinise the funding.
Electricity North West	Network Party	-	-

Question 8: Do you agree that the legal text will deliver MP111?

Question 8			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	The changes largely meet the requirements but may need refining.
NMi Certin	Other SEC Party	N/A	The legal text should be reviewed and confirmed by independent legal advisors.
Calvin Capital	Other SEC Party	No – some minor changes and clarification required	<p>Further refinement of the proposed legal drafting may be required for the following reasons:</p> <p>F12.5 – states that the SMDASC will shall procure the services of an independent testing organisation to provide interoperability and interchangeability testing services. There has never been a restriction on the scheme employing a single test house and this clause should be redrafted to enable the SMDASC to employ more than one test house in the future if it is deemed economic.</p> <p>Under the current SMDA scheme, meter asset providers can be scheme members and this provides them with independent access to the Device Assurance Register so that a MAP can ensure that the devices it purchases have been assured by the SMDA. It is unclear from the drafting if and how MAPs will be able to access the DAR under this proposal and the drafting of F12.9 appears to potentially preclude any direct MAP access to the DAR. Please can you clarify what the scheme access proposed for MAPs is? We would propose that the current access to the DAR is provided to all meter asset providers, rather than just the subset of existing scheme members it is provided to now. We suggest that the drafting includes a statement along the lines of: “Access to the Device Assurance Register will be provided without charge to any meter asset provider registered to Smart Metering</p>

Question 8			
Respondent	Category	Response	Rationale
			<p>Equipment”. We recognise that MAPs could gain access to the DAR via manufacturers, but we believe that direct independent access to the DAR provides a better solution for MAPs.</p> <p>The current drafting relating to the SMDA Charges is complicated and, whilst we believe that it reflects the intentions set out in the Modification Proposal, we would like further clarification that this is indeed the case. We expect that the fixed costs of the SMDA scheme will be recovered via SEC charges whilst the variable costs of testing will continue to be met by device manufacturers as and when a device is submitted for testing.</p>
CMAF representing Meter Asset Providers	Trade Association	No	<p>Further refinement of the proposed legal drafting may be required for the following reasons:</p> <p>F12.5 – states that the SMDASC will shall procure the services of an independent testing organisation to provide interoperability and interchangeability testing services. There has never been a restriction on the scheme employing a single test house and this clause should be redrafted to enable the SMDASC to employ more than one test house in the future if it is deemed economic.</p> <p>Under the current SMDA scheme, meter asset providers can be scheme members and this provides them with independent access to the Device Assurance Register so that a MAP can ensure that the devices it purchases have been assured by the SMDA. It is unclear from the drafting if and how MAPs will be able to access the DAR under this proposal and the drafting of F12.9 appears to potentially preclude any direct MAP access to the DAR. Please can you clarify what the scheme access proposed for MAPs is? We would propose that the current access to the DAR is provided to all meter asset providers, rather than just the subset of existing scheme members it is provided to now. We suggest that the drafting includes a statement along the lines of: “Access to the Device Assurance Register will be provided without charge to any meter asset provider registered to Smart Metering Equipment”. We recognise that MAPs could gain access to the DAR via manufacturers, but we believe that direct independent access to the DAR provides a better solution for MAPs.</p>

Question 8			
Respondent	Category	Response	Rationale
			<p>Under the current drafting, we believe that K7.6(a) creates the need for the test fees to be published as DCC Explicit Charges and we believe that the place for this to be published is the DCC Charging Statement. We would suggest that these charges should be agreed before implementation of the Modification Proposal (it would seem sensible to set these at the current level of testing fees) and that a revised version of the DCC Charging Statement should probably be published including these new Explicit Charges at the time of implementation of the Modification Proposal for transparency.</p> <p>We have run through the legal drafting as is and we believe that it allocates costs in accordance with the principles of the Modification Proposal. However, it is difficult to interpret and we would like to ensure that our interpretation is accurate. Please can you confirm our interpretation as below. We would suggest that this worked example (or equivalent) is published in the final Modification Proposal to demonstrate to stakeholders that the charges are allocated appropriately:</p> <ul style="list-style-type: none"> • The procurement activity by the SMDA Committee automatically puts the cost of the contract into SECCo Ltd and this would then form part of the costs that go into the SEC Panel budget. The approved SEC Panel budget is wholly recovered via DCC Charges to Users so the fixed costs of the scheme will simply flow through to suppliers and network operators based on the existing charging arrangements (e.g. DNOs pay [3%] and suppliers pay [97%] – split between both groups on market share (MPxNs). • F12.7 brings in the obligation on Parties to pay the variable testing costs in accordance with the SEC charging arrangements in Section J and as billed by DCC. • F12.8 gives the job of working out the variable testing costs to the SMDA Sub-Committee. This seems appropriate given that there may be non-testing variable costs within SMDA that should be recovered via the DCC 'fixed' charges (e.g.

Question 8			
Respondent	Category	Response	Rationale
			<p>updates to reflect industry change or retesting not at the fault of the manufacturer). We believe that these variable testing charges should be agreed in advance of the implementation date, as noted above.</p> <ul style="list-style-type: none"> F12.9 ensures equitable variable testing costs for any testing party that isn't a SEC Party and payment up-front as they are not subject to the same SEC obligations for payment as SEC Parties. K7.5(m) creates 'SMDA services' so that DCC are able to invoice for variable testing costs. This is consistent with the way in which security assessments are carried out / paid for (covered in K7.5(a)) <p>K7.6(a) creates the need for the test fees to be published as DCC Explicit Charges. We believe that this should result in a new publication of the DCC Charging Statement, as above, for transparency to stakeholders.</p>
BUUK Infrastructure Limited	Networks Party	Yes	No comments
EUA	Other SEC Party	Yes	-
EDF	Large Supplier	No	<p>SEC Legal Text</p> <ul style="list-style-type: none"> F12.4 - should this section refer specifically to SMETS2+ Smart Meters and other Devices? The SEC covers SMETS1 but SMDA doesn't so it might be useful to make this explicit. F12.5 - This says that the SMDA Sub-Committee 'shall procure the services of an independent testing organisation to provide interoperability and interchangeability testing services' - what level of engagement will other SEC Parties have in this procurement process, will this process need involvement or approval from the Panel? We don't believe any of the other Sub-Committees have any specific procurement

Question 8			
Respondent	Category	Response	Rationale
			<p>power so clarity on how this would work and be overseen would be useful. It would be good know how this would work even if it isn't spelt out in the SEC; it might be useful to include details in the Modification report. It is worth noting that responsibility for procurement is not mentioned in the draft ToR for the SMDA Sub-Committee either.</p> <ul style="list-style-type: none"> F12.5 – This section refers to an 'independent' testing organisation, it needs to be clearer who or what it needs to be independent from. In the case of the User Independent Security Assurance Service Provider the independence criteria are set out in section G of the SEC, something similar may be required here. <p>Terms of Reference</p> <ul style="list-style-type: none"> 3.4 SMDA Sub-Committee Chair - there seems to be a numbering issue - this should be 4.4 SMDA Sub-Committee Chair 3.6 Membership - there seems to be a numbering issue - this should be '4.6 Membership' 3.10 Conflict of Interest - there seems to be a numbering issue - this should be 4.10 Conflict of Interest 6 - 'The membership shall comprise the SMDA Co Board' should probably say 'The initial membership shall comprise the SMDA Co Board' for clarity. <p>6 - The reference to section 3.8 should be to section 4.8</p>
OVO	Large Supplier	Yes	The legal text aligns to the delivery set out
EON	Large Supplier	No	F12.5 implies that the SMDASC can only contract with a single test house for carrying out it's testing. This should be redrafted to allow for more than one test house if there was demand and economic benefit in doing so.

Question 8			
Respondent	Category	Response	Rationale
			There is ambiguity on who has access to the Digital Access Register (DAR), as it implies that MAPs may not have access to this if approved in its current form. We suggest legal drafting in line with our response to question 7
Utilita	Large Supplier	Yes	-
UK Power Networks	Network Party	Yes	There are no legal objections to the proposal and therefore we agree that the legal text will not obstruct the proposal. The legal text addresses the issue of payment clearly and leaves no room for misinterpretation.
Centrica	Large Supplier	Yes	We agree that the legal text does deliver the intent of the proposal. However, we would like to raise one observation with the legal text: The proposed text in F12.5 is worded such that it limits the procurement to a single service provider – this is not an explicit requirement and we suggest that it is amended to not be so prescriptive and to allow for SMDA to be delivered by more than one service provider (if ever necessary). Although not necessarily a legal text matter, It is not clear how Meter Asset Providers (MAPs), that are currently members of the SMDA Scheme, will be able to participate in SMDA governance, and have access to the necessary documentation etc, unless they are a SEC Party (assuming that scheme documentation will be available to all SEC Parties). Whilst we do not believe this should part of the legal text, we do believe that it requires clarification. For example, the proposer, or working group, may well agree that any organisations that wish to participate will need to be a SEC Party. An alternative would be that the SMDA Sub-Committee agree to suitable alternative arrangements. We welcome clarity on this in the Final Modification Report.
DCC		Neutral	DCC would like to review the legal text following the clarifications made on the charging requirements as outlined in the responses to questions 2 and 3.

Question 8			
Respondent	Category	Response	Rationale
SSEN	Network Party	Yes	SSEN agree that the legal text will deliver the budget amendments required by this modification.
WPD	Network Party	No	Overall we agree that the legal text delivers the intent of the modification with regards to the SMDA Budget, however we feel it is unclear as to exactly what additional charges will be incurred. We note that the scope of the scheme is not included within this.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	Yes	We have no comment on the legal text.
Electricity North West	Network Party	-	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP111 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Chameleon Technology UK Ltd	Other SEC Party	Yes	Ensuring interoperability across deployed assets is fundamental to the successful delivery of a seamless and positive experience from smart meters.
Horizon Energy Infrastructure	Other SEC Party (MAP)	Yes	Consumers will benefit from MP111 by the existence of independent device assurance testing which will ensure a stable system for their smart meter systems to function as intended into the future. There is reduced risk that smart metering solutions will not be interoperable and interchangeable reducing the risk of increased cost of asset replacement, particularly where individual devices within the smart metering system can be individually replaced. As per the Modification Report: “Consumers will benefit as the SMDA Scheme provides independent assurance that Devices are interoperable and interchangeable. This will ensure compatibility of Devices in the field, fewer exchanges of Devices and fewer site visits, with their associated costs and inconvenience.”
NMi Certin	Other SEC Party	Yes	Positive benefits – consumers should benefit from enhanced confidence that their experience of smart metering is not impacted by smart metering devices not operating as required when exchanged or connected to the SMHAN.
Calvin Capital	Other SEC Party	Yes	Consumers will benefit from MP111 by the existence of independent device assurance testing which will ensure a stable system for their smart meter systems to function as intended into the future. There is reduced risk that smart metering solutions will not be interoperable and interchangeable reducing the risk of increased cost of asset replacement, particularly where individual devices within the smart metering system can be individually replaced. As per the Modification Report: “Consumers will benefit as the SMDA Scheme provides independent assurance that Devices are interoperable and interchangeable. This

Question 9			
Respondent	Category	Response	Rationale
			will ensure compatibility of Devices in the field, fewer exchanges of Devices and fewer site visits, with their associated costs and inconvenience.”
CMAF representing Meter Asset Providers	Trade Association	Yes	Consumers will benefit from MP111 by the existence of independent device assurance testing which will ensure a stable system for their smart meter systems to function as intended into the future. There is reduced risk that smart metering solutions will not be interoperable and interchangeable reducing the risk of increased cost of asset replacement, particularly where individual devices within the smart metering system can be individually replaced. As per the Modification Report: “Consumers will benefit as the SMDA Scheme provides independent assurance that Devices are interoperable and interchangeable. This will ensure compatibility of Devices in the field, fewer exchanges of Devices and fewer site visits, with their associated costs and inconvenience.”
BUUK Infrastructure Limited	Networks Party	Yes	There would be an indirect benefit in that smart meters will be more likely to function correctly and therefore confidence in them will increase. Reduced risk of meter exchanges because of a change of supplier event which will ultimately lead to lower overall programme costs. There will also be reduced inconvenience to individual customers from excessive meter exchanges.
EUA	Other SEC Party	Yes	As outlined above, the scheme has been set up to provide assurance across the industry that smart meter equipment will work effectively in a smart environment and therefore reducing the risks further of any issues through firmware updates which may impact consumers (e.g. incompatibilities identified with equipment through OTA process).
EDF	Large Supplier	Yes	At present multiple energy suppliers are testing the same devices, which lead to duplication of effort and unnecessary cost. Supplier integration testing will always be required to ensure that devices and the DCC Ecosystem interact with supplier back office systems and processes on an end to end basis. However, we would hope that the level of asset testing

Question 9			
Respondent	Category	Response	Rationale
			<p>carried out by suppliers will be reduced as a result of the SMDA outputs, therefore driving down costs to serve.</p> <p>In addition the scheme aims to ensure 'interchangeability', which can only be a good thing for the consumer when it comes to exchanging individual devices, as only a single device will need to be replaced rather than the whole smart metering system.</p>
OVO	Large Supplier	Yes	Yes, the increased take up and use of the scheme will greatly benefit all elements of the SMiP. This will all benefit consumers.
EON	Large Supplier	Yes	Consumers will benefit from a stable smart system due to the SMDA being able to conduct it's independent interoperable and interchangeable testing on the smart devices available to the industry. This funding change to the SEC will enable SMDA to get itself ahead by being able to test new devices and technology straight away, meaning more consumers will be able to access to benefits of smart metering (such as Polyphase and twin element)
Utilita	Large Supplier	Yes	We believe there will be an indirect benefit for Energy Consumers. The sooner SEC Parties can be notified of device interoperability and interchangeability issues (preferably before devices are installed in consumers premises) the faster we can find a solution. This should reduce impact that device/firmware issues have on Energy Consumers, as well as reducing the need for a site-visit and/or exchange which can cause inconvenience.
UK Power Networks	Network Party	Yes	Network Operators will incur the additional SMDA membership charges levied by SEC through the DCC charges that will ultimately result in Network Operator customers being liable for costs associated with a requirement for Energy Suppliers meeting their own Licence Obligations.
Centrica	Large Supplier	Yes	Implementation will help to ensure smart metering devices are interoperable and interchangeable, helping to ensure that they are fit for purpose and remain operational for

Question 9			
Respondent	Category	Response	Rationale
			their asset life. This will avoid any unnecessary disruption or inconvenience that may otherwise be experienced by customers due to devices that are no longer functioning correctly as part of their Smart Metering System and require replacement.
DCC		Yes	Whilst funding from all SEC Parties may result in benefits for consumers, DCC considers that benefits will be minimal unless the wider issues outline in response to question 1 are addressed.
SSEN	Network Party	No	From the previous consultation, as the scope of testing is remaining unchanged, SSEN believe there will be minimal consumer benefit from this Modification.
WPD	Network Party	No	Western Power Distribution feel that because the scope of the scheme is remaining unchanged then consumers will not see any benefits as a result of this modification. Although we accept that the change would allow the scheme to continue, we are not convinced that the current scope is providing any assurance on devices that are being installed and is therefore not providing any benefits to consumers.
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	No	As highlighted in our response to Q1. It is our view that a full review is needed in order for consumers and the wider market to benefit from a value for money, enduring SMDA Scheme. Until this is undertaken, we do not agree with fixed costs being levied on all parties through the SEC.
Electricity North West	Network Party	-	-

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
Chameleon Technology UK Ltd	Other SEC Party	None
Horizon Energy Infrastructure	Other SEC Party (MAP)	-
NMi Certin	Other SEC Party	Confidential response provided
Calvin Capital	Other SEC Party	-
CMAP representing Meter Asset Providers	Trade Association	-
BUUK Infrastructure Limited	Networks Party	It would seem logical to include DCC communications hub within the SMDA scheme and now that it is within the SEC there should be no impediment to this being progressed.
EUA	Other SEC Party	-
EDF	Large Supplier	-
OVO	Large Supplier	Nothing further to add at this time.
EON	Large Supplier	-
Utilita	Large Supplier	-
UK Power Networks	Network Party	Testing of devices under SMDA services will support the SEC objectives for all devices to meet with the SMETS specification.

Managed by



Question 10		
Respondent	Category	Comments
		<p>Supplier Licence Obligations stipulate that devices installed by them are to be compliant with the SMETS specification, therefore the SMDA testing regimes should include testing to ensure that all Network Operator specific requirements are being met and are to a standard acceptable to DNOs.</p> <p>The proposal advises that the SEC Panel would oversee the SMDASC and be responsible for the contract with the Test House but there should also be oversight of testing standards and outputs to ensure compliance.</p>
Centrica	Large Supplier	N/A
DCC		N/A
SSEN	Network Party	<p>SSEN agree with the findings of the NAO, that the current funding mechanism is not sustainable. However, SSEN as a Networks Party are not accountable or responsible for ensuring compliant meters are released into production. SSEN believe the new funding scheme should take this into account. As documented in question 5, SSEN would be happy to evaluate in the future on including Network Parties in the funding model as currently we would have concerns if forced into a scheme and associated costs that did not add value for its customers or its business</p>
WPD	Network Party	<p>We believe that there is an error in the consultation report, under 'Summary of the responses'. The final bullet on page nine states:</p> <ul style="list-style-type: none"> 21 respondents believed the SMDA fixed costs should be covered under the SEC, answering 'strongly agree' (12) or 'agree' (nine); <p>The first bullet point on page ten states:</p> <ul style="list-style-type: none"> 21 respondents believed the SMDA fixed costs should not be covered under the SEC, answering 'strongly agree' (nine) or 'agree' (12); <p>We believe that the second bullet is actually meant to refer to 'variable' costs.</p>

Question 10		
Respondent	Category	Comments
Drax Group (Haven Power Limited and Opus Energy Limited.)	Small Supplier	The SMDA Scheme would be valuable if it delivered full assurance on interoperability. The reasons the current Scheme has failed to deliver need to be addressed as part of a wider review to secure long-term validity and value for money.
Electricity North West	Network Party	-

CMAF representing Meter Asset Providers

CMAF Members:

- Calvin Asset Management Limited
- National Grid Smart Ltd
- Smart Meter Assets 1 Limited
- Scotia Gas Networks
- EON
- Northern Powergrid Metering Limited
- Horizon Energy Infrastructure Limited
- Macquarie
- Smart Meter Assets Ltd
- Smart Meter Systems plc