

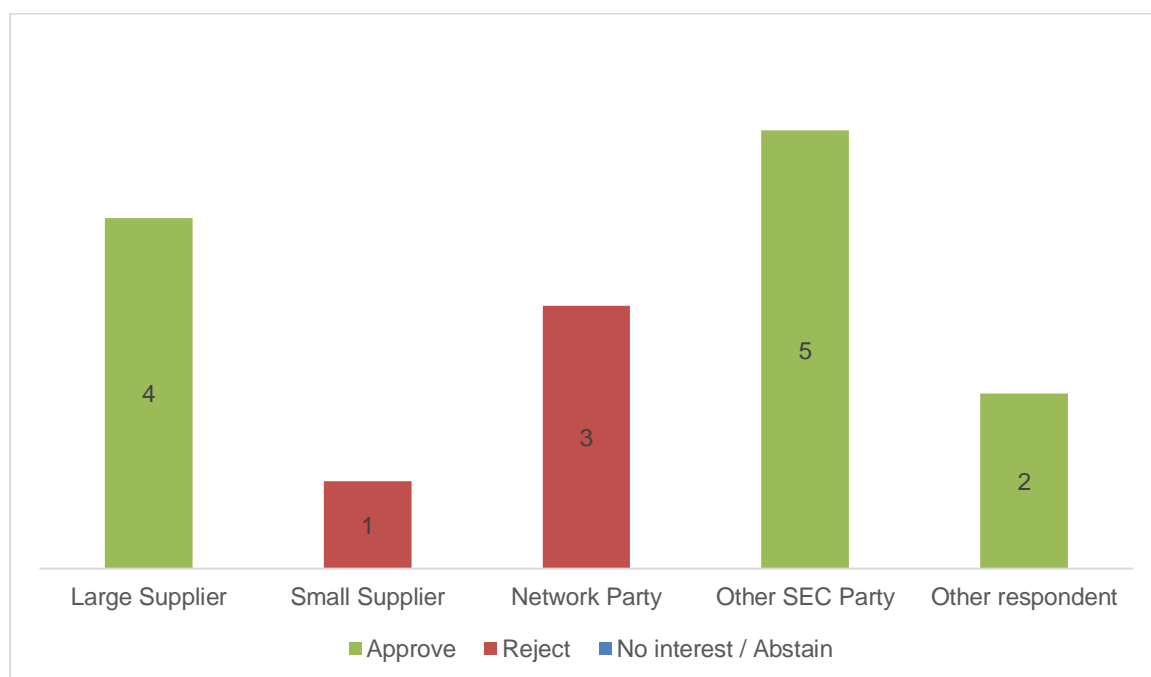
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MP111 'SMDA Budget Amendments' Modification Report Consultation responses (White)

About this document

This document contains the collated responses received to the MP111 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP111 should be approved?

Question 1				
Respondent	Category	Response	Rationale	Comments from SMDA
OVO Energy	Large Supplier	Approve	OVO fully supports the SMDA Scheme and has worked very closely with Energy UK in their response and has actively input into it. Please refer to that for our rationale.	
EDF	Large Supplier	Approve	<p>EDF supports this modification which will enable the SMDA scheme to have reasonable funding and robust governance, involving parties that benefit as well as pay for the scheme fixed costs. SMDA is the main vehicle available to meet the recommendations from the NAO report.</p> <p>We believe that incorporating SMDA funding into the SEC will eventually make a considerable contribution to several SEC Objectives.</p> <p>In the short term we agree that this change will better facilitate general SEC Objective (a) and <i>'facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.'</i></p>	
CMAA representing Meter Asset Providers	Trade Association (Other SEC Parties)	Approve	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. It is consistent with the SEC Objectives.	

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Calvin Capital	Other SEC Party	Approve	<p>We believe that this modification provides the best way to ensure that the SDMA scheme is funded into the future and can continue to provide an independent assurance scheme for smart devices, as set out as a key recommendation from the National Audit Office testing review.</p> <p>The proposal will better facilitate several SEC objectives and specifically SEC Objective (a) as the existence of the SMDA scheme and the testing it provides will ensure that the smart devices installed are interoperable with both each other and with the DCC system.</p>	
WPD	Network Party	Reject	<p>Whilst we understand the intent of this modification and believe that the SMDA Scheme is a good initiative, we challenge how much Network Operators are and will benefit from the scheme. Network Operators rely on the supplier obligation to install compliant smart meters and the scheme is designed to ensure interoperability on a change of supplier, rather than provide assurance that devices are compliant.</p> <p>There are currently issues that we are seeing in production where devices are not compliant, and we have to implement workarounds to allow for this. As the modification does not require mandatory SMDA assurance we are unsure exactly how much benefit the Network Operators might achieve from the implementation of this modification as it stands.</p> <p>Currently the scope of the SMDA testing does not meet the needs of the Network Operators, and we have engaged with the Scheme to try and address this, unsuccessfully. As this modification is not looking to amend the scope at present, we do not feel that the modification</p>	<p>SMDA agrees that a mandatory Scheme may be of benefit for the industry. SMDA is committed to reviewing the scope of the Scheme should this modification be accepted. It has been unable to do this to date as a result of the current funding arrangements.</p> <p>SMDA has previously engaged with DNOs to ensure around 90% of the Service Requests tests that they sought to include were covered by the Scheme. SMDA has reached out for DNO representatives but none have taken up the offer. SMDA would welcome the feedback referenced by</p>

Question 1				
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			<p>should be approved as it stands as we don't believe that Network Operators should be incurring any costs for the scheme.</p> <p>We understand that in time the scope of the testing could be extended to include testing that Network Operators would benefit from and at this point the funding could be reviewed.</p> <p>In summary, based on the above, we question whether this modification, as it is written, will actually facilitate any of the SEC Objectives.</p>	WPD for its consideration and would again offer WPD and other DNOs to nominate a DNO representative to attend future meetings.
Energy and Utilities Alliance (EUA)	Other SEC Party	Approve	<p>The SMDA Scheme was originally created by Suppliers, Device Manufacturers and funders of the Smart Metering Programme, who identified a common benefit in establishing a central assurance regime, with the prime objective of providing independent assurance (and therefore confidence for Industry) of interoperability of those devices.</p> <p>These overall objectives and needs continue, and this modification provides the required long term financial stability for the scheme which is essential for it moving into the future. The Modification is also providing the appropriate governance through the SEC Panel / sub group to allow the scheme to adapt and meet the continued challenges / future requirements as the Smart Metering Programme develops, in order to support its objective and the work required of meeting the challenges for Net Zero.</p>	
Horizon Energy Infrastructure	Other SEC Party	Approve	<p>This modification will enable SMDA to continue supporting the industry through testing the interoperability of devices into the future. Independent assurance is key for all SEC parties and fulfils the</p>	

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			recommendations in the NAO reports as well as supporting SEC Objectives.	
BEAMA	Other SEC Party	Approve	To facilitate the interoperability of Smart Metering Systems by ensuring the continuation of testing for interoperability of smart metering devices, including on change. By ensuring that while the costs of testing individual devices lie with the manufacturer, the costs of maintaining the test system and structures lie with the SEC Parties receiving the benefits of interoperability.	
ENWL	Network Party	Reject	<p>Whilst we are supportive of moves to ensure devices are properly tested before being installed in customers premises the following are areas on which this solution would benefit from further development:</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 fixed cost funding to deliver a supplier licence obligation as part of a supplier led smart meter rollout. We request that these charges are ring fenced for the Supplier Party Category only. Whilst the Panel stated DNOs “<i>would still benefit from the current testing and assurance.</i>”, it is our view that SMDA is aimed at ensuring that a meter fitted by Supplier-A can be successfully churned and operated by Supplier-B and does not: 	<p>1) SMDA is already working with BEIS and the DCC to develop proposals to introduce Communications Hubs (CHs) into the scheme. This work will help to support the interoperability of Devices and help to identify areas where changes in CH firmware can be picked up prior to entering the live production environment. This work, together with the fact that approximately 90% of the service request tests that DNOs sought to include within SMDA are already covered, demonstrates that SMDA is not only a benefit to Suppliers, but extends to the wider industry</p>

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			<p>a) guarantee that a meter is compliant with SMETS nor that it fully operates seamlessly with Communications Hubs. An example being known issues with multiple versions of meters which DNOs don't receive Power Restoration Alerts from because the meter 'sends' them before the Communications Hub has rebooted and is awake following a power outage..</p> <p>b) test every SMETS2 function/alert and it also doesn't prevent non-compliant meters from being fitted into customer premises. ENWL have come across scenarios where some non-compliant device issues cannot be resolved with Over the Air (OTA) firmware updates and as such we have non-compliant devices connected to our network until they reach end of life and are replaced, resulting in complex workarounds or vital DNO functionality being undermined.</p> <p>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. Could it become mandatory for Manufacturers to submit devices/firmware to SMDA? Should it be mandatory that Suppliers can only fit devices/firmware that have been passed by SMDA? Whilst the Panel stated "the inability for the SMDA Scheme to increase its scope has come from a lack of funding", even with extending resource if the SMDA remains voluntary how can it ever be effective.</p> <p>3) The SMDA remit has been to "provide assurance testing of smart metering equipment covering both interoperability and</p>	<p>too. The 6% allocation is further broken down by market share to each of the DNOs</p> <p>SMDA has committed to reviewing its scope as a matter of course should this SEC modification be accepted, as such the issues raised here in (a) and (b) can be further addressed as part of the scope review.</p> <p>2) SMDA would welcome the Scheme becoming mandatory however neither SMDA nor the SEC have the authority to implement this. In its current voluntary status, it has sought agreement from many Suppliers to include the need for SMDA assured Devices for their portfolio. This has successfully led to changes to agreements between Suppliers and Device manufacturers, however SMDA accepts that more work is</p>

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			<p>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> <p>4) 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> <p>Increase transparency on the issues for different meter and hub combinations.</p>	<p>needed here from industry to support this.</p> <p>3) Whilst it is correct that SMDA does not test all of the Device functionality, it does test a significant proportion (circa 67%) of the current SMETS2 requirements. The remaining elements are focussed predominantly on security of Devices, and are covered by other schemes, such as CPL.</p> <p>4) It is correct that costs would need to be considered as part of any changes in scope of the Scheme. The impact of any changes to accommodate an increase in scope of the scheme will need to be considered at that time. It will be requisite on finding a balance between cost and benefits and will be then subject to SEC Panel scrutiny.</p>
Energy UK	Trade Association	Approve	Energy UK strongly supports the SMDA Scheme and its objectives, given its importance to the smart metering rollout in providing independent assurance that devices operating within the smart	

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			<p>metering ecosystem are both interoperable and interchangeable. Energy UK therefore fully supports the approval of MP111; we believe MP111 better facilitates the SEC Objectives as outlined below.</p> <p>SEC Objective “a” (<i>Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers’ premises within Great Britain</i>) is better facilitated by:</p> <ul style="list-style-type: none"> • Having SMDA providing independent assurance of devices in respect of interoperability and interchangeability (interoperability on change), while also supporting overall compliance with the SEC Technical Specifications. <p>the efficient and effective operation of the SEC and the overall rollout to ensure consumer benefits are realised and any issues relating to device interoperability and incompatibility are identified or avoided, whether it is in relation to device functionality and/or devices communicating with each other on the HAN.</p> <ul style="list-style-type: none"> • Helping reduce duplication of testing effort and significant costs across Energy Suppliers by having independent SMDA assurance. Furthermore, supporting Energy Suppliers’ testing during the formal “User Interface Testing” phase by ensuring that these testing activities are focused on the interoperability of Energy Suppliers’ systems with DCC systems – rather than additionally testing DCC’s Comms Hubs for interoperability with other devices (as is currently the case for Energy Suppliers). 	

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			<p>SEC Objective “c” (<i>Facilitate energy consumers’ management of their use of electricity and gas through the provision of appropriate information via smart metering systems</i>) is better facilitated by:</p> <ul style="list-style-type: none"> Helping ensure that the smart metering system provides consumers with accurate, timely and fit for purpose information thus giving confidence to consumers that devices installed in their premises are functioning correctly. Supporting identification and resolution of issues affecting communications between devices within the consumer’s HAN thus enhancing the consumer experience and confidence on the overall smart metering system. <p>SEC Objective “d” (<i>Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy</i>) is better facilitated by:</p> <ul style="list-style-type: none"> Providing confidence (and assurance) to Energy Suppliers during the Change of Supply process that the smart metering system is functioning as expected and in line with the SEC Technical Specifications. Helping minimise costs for Energy Suppliers of any potential Meter Asset Provider early termination charges, where the gaining Energy Supplier sees a need to replace an existing installation. Helping ensure a fair and equitable sharing of costs between SEC Parties (especially Energy Suppliers) for the fixed cost 	

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			<p>element of the Scheme, and avoids the situation whereby only a subset of Energy Suppliers are paying for the Scheme (and effectively subsidising other non-contributing Energy Suppliers).</p> <p>SEC Objective “e” (<i>Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy</i>) is better facilitated by:</p> <ul style="list-style-type: none"> Providing confidence (and assurance) to Distribution Network Operators that the majority of Network Operator functionality specified in the SEC Technical Specifications have been independently assured by the Scheme, and therefore supporting Network Operators’ use of the smart metering system to help realise Network Operator benefits. 	
Utilita	Large Supplier	Approve	<p>Bringing the SMDA under the SEC, and thereby the SMDA budget, will lead to improved interoperability and interchangeability of SMETS2 devices. In doing so Utilita believes this will best facilitate SEC Objectives “a” and “c”.</p> <p>Changing the governance of the SMDA will add greater independent assurance to the operation of smart metering systems. This will be achieved through better access of long-term funding possibilities, leading to greater stability of the scheme. Stable funding is likely to enable development of the scope of SMDA to further improve interoperability (through increased testing), thereby aligning with SEC Objective “a”.</p>	

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			<p>Incorporating SMDA into the SEC should lead to an improved smart metering system experience for Energy Consumers by increasing the possibilities and opportunities of testing across various devices and firmware. It also increases the potential for SEC Parties to work together on addressing concerns around devices and firmware. In turn this should lead to SEC Parties reaching a higher level of confidence that all devices released into the market are working as they should, and resolve issues being brought into live production.</p> <p>Detection and resolution of issues before devices enter Consumers' premises allows Consumers to have greater confidence in the smart metering system, reducing the likelihood of possible inconvenience e.g. site visits. This is important for all Consumers especially pre-payment customers, many of whom are vulnerable and have a 'live' relationship with their meter. This is in line with SEC Objective "c" as the smart meter remains fit for purpose.</p>	
Scottish and Southern Electricity Networks	Network Party	Reject	<p>As noted in previous consultation responses, whilst we understand the reasons for changing the funding model for SMDA. SSEN paying/incurred any of these costs whilst the scope doesn't provide key benefits to Network Parties and its customers, SSEN do not believe this modification should be approved.</p> <p>In the responses to our previous consultation questions, regarding the scope, it was confirmed that "SMDA intends to review this following the approval of this modification". It was also noted from modification workshops, that there is no guarantee that an increase of scope will be reviewed/approved. also noting that there could be a significant increase in costs if scope was changed that would also need to be</p>	<p>As noted in our response to ENWL, SMDA is committing to reviewing the scope of the Scheme as a matter of course should this modification be accepted. SMDA would work with DNOs and other Parties to review its scope to ensure further views from DNOs are covered. We have not had any DNOs taken up the offer to be represented to date but would welcome their input.</p>

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Respondent	Category	Response	Rationale	Comments from SMDA
			approved. As this modification in its current state does not address current key issues Network Parties are observing in the live environment, we have concerns if forced into a scheme and associated costs that do not add value for its customers or its business.	
Drax Group (Haven Power and Opus Energy)	Small Supplier	Reject	We believe a thorough review of the SMDA Scheme is needed before considering an alternative funding model. MP111 seeks only to change the funding and governance of the Scheme. We do not believe this alone will better facilitate the General SEC Objectives. 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.	<p>SMDA understands that this modification supports the 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.</p> <p>In addition, there are a number of items on the SEC, Technical Architecture and Business Architecture Sub-Committee (TABASC) risk register which are focussed on the interoperability of Devices, something that SMDA is focussed on and which will continue to benefit the whole industry.</p> <p>SMDA has indicated previously that it will review its scope as a matter of</p>

Question 1				
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				course should this SEC modification be accepted.
British Gas	Large Supplier	Approve	<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:</p> <ul style="list-style-type: none"> • 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. • Although SMDA testing is not proposed to be mandatory, there is a general expectation from parties (e.g. suppliers and Meter Asset Providers (MAP)) that devices require such testing and only devices that have had such testing will be allowed (or funded) into the supply chain. Having the scheme within the SEC provides greater transparency to all on the testing arrangements, allow equal access to the testing and allows parties to be involved with the governance of the scheme, if they choose to do so. • Implementation, and inclusion within the SEC, will also act as a stepping-stone for future development of the SMDA scheme. This will allow for initiatives such as the inclusion of all DCC communications hub variants in the scheme as test reference devices and/or as devices to be tested. Such initiatives will allow parties to more easily identify any interoperability issues sooner in the process – thus allowing 	

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			<p>rectification earlier and ultimately getting devices assured and in the supply chain quicker.</p> <p>We also agree with the Proposer that this modification better facilitates SEC Objective (e), the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy, as:</p> <ul style="list-style-type: none"> It will provide greater confidence and assurance to Distribution Network Operators (DNOs) that the Network Operator functionality specified in the SEC Technical Specifications have been independently assured by the Scheme, and therefore supporting Network Operators' use of the smart metering system to help realise Network Operator benefits. By extending the governance arrangements to all parties, by inclusion in the SEC, will also allow DNOs to play a part in determining future test specification and scope to ensure that areas where there is the greatest benefit to DNOs can be given the necessary scrutiny to ensure efficient delivery of such benefits. <p>We also believe that implementation will better facilitate SEC Objective (c), energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems, by:</p> <ul style="list-style-type: none"> Helping to ensure that the smart metering system provides consumers with accurate, timely and fit for purpose 	

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Question 1				
Respondent	Category	Response	Rationale	Comments from SMDA
			<p>information thus giving confidence to consumers that devices installed in their premises are functioning correctly.</p> <ul style="list-style-type: none"> Supporting identification and resolution of issues affecting communications between devices within the consumer's HAN thus enhancing the consumer experience and confidence on the overall smart metering system <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:</p> <ul style="list-style-type: none"> 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 current SMDA supplier members effectively cross subsidising non-SMDA supplier members and therefore facilitates effective competition. Greater centralised testing, through a testing regime available to all via the SEC, will also help to reduce the reliance on supplier testing to identify issues. This will help in avoiding duplication of test effort for those suppliers that are actively testing new versions of devices / firmware and therefore offers more equitable arrangements for all suppliers. 	
NMi Certin B.V.	Other SEC Party	Approve	NMi supports the findings and conclusions of the MP111 impact assessment and related consultation outcomes.	

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	
OVO Energy	Large Supplier	We are aware there is still considerable other work being undertaken on the scope of the scheme and the work it undertakes, none of which is subject to this Modification and should not hinder this progressing accordingly.	
EDF	Large Supplier	No further comment	
CMAF representing Meter Asset Providers	Other SEC Party	We appreciate the response provided in the Final Modification Report to the comments raised by CMAF and others to the previous consultation. The funding arrangements are now clear and the proposed access to the SMDA Scheme and the DAR has been confirmed for all MAPs and with payment of a nominal administrative fee for non-SEC Party MAPs. SECAS has confirmed that this will be part of the responsibilities in the ToR of the SMDA Sub-Committee in the absence of any explicit legal text elsewhere and that the Modification Report acts as the official record that MAP access will be implemented in this way.	
Calvin Capital	Other SEC Party	<p>The proposal has addressed the comments we made to in response to the previous consultation. In particular that MAPs will have access to the SMDA Scheme and the DAR either directly as a SEC Party or via the payment of a nominal administrative fee for non-SEC Party MAPs.</p> <p>We acknowledge that MAP access to the SMDA scheme and DAR is not set out in the legal drafting but accept that this will be addressed via the ToR of the SMDA Sub-Committee in the absence of any explicit legal text.</p>	The terms of reference have been amended to include the setting of the SMDA membership fee for non-SEC Parties

Question 2			
Respondent	Category	Comments	
WPD	Network Party	<p>We would also like to challenge the detail in the modification regarding the SMDA Sub Committee. Page seven of the MRC states:</p> <p><i>Role of the SMDA Management Panel (which will become a sub-group of the SMDASC)</i></p> <p><i>Current structure and make up</i></p> <p><i>Nine members:</i></p> <ul style="list-style-type: none"> • <i>Two Supplier representatives</i> • <i>Two MAP representatives</i> • <i>Four Manufacturer representatives:</i> <ul style="list-style-type: none"> ○ <i>One Electricity Smart Metering Equipment (ESME) manufacturer (BEAMA)</i> ○ <i>One Gas Smart Metering Equipment (GSME) manufacturer (EUA)</i> ○ <i>One Prepayment Metering Interface Device (PPMID) / In-Home Display (IHD) manufacturer</i> ○ <i>One further member</i> • <i>One Electricity Network Party representative</i> <p><i>Guest attendees:</i></p>	The extract here is for membership of the Management Panel not the SMDASC.

Question 2											
Respondent	Category	Comments									
		<ul style="list-style-type: none">• <i>The Scheme Operator (Chair of the meeting)</i>• <i>The Test House</i>• <i>The DCC</i> <p><i>The Proposed Solution is that the structure remains the same.</i></p> <p>However the ToR detailed in the modification states:</p> <table><tr><th>Member Group</th><th>Numbers</th></tr><tr><td>Energy Suppliers</td><td>2</td></tr><tr><td>Device Manufacturers</td><td>2</td></tr><tr><td>Meter Asset Provider</td><td>1</td></tr></table> <p>We seek clarification regarding the differences.</p>	Member Group	Numbers	Energy Suppliers	2	Device Manufacturers	2	Meter Asset Provider	1	
Member Group	Numbers										
Energy Suppliers	2										
Device Manufacturers	2										
Meter Asset Provider	1										
Energy and Utilities Alliance (EUA)	Other SEC Party	This modification will move SMDA under the SEC, which allows the scheme to provide the most economic and equitable option to ensure that independent assurance of devices for the Industry (and consumers) is achieved. This provides confidence for the whole Industry that devices which have achieved SMDA assurance, will continue to be interoperable (and interchangeable) after CoS, firmware upgrades, etc.									
Horizon Energy Infrastructure	Other SEC Party	We are members of CMAP and fully support the CMAP response to this modification.									

Question 2			
Respondent	Category	Comments	
BEAMA	Other SEC Party	-	
ENWL	Network Party	None	
Energy UK	Trade Association	Energy UK suggests that further wider engagement with SEC Parties / Energy Suppliers is needed, especially those not currently members of the Scheme, to provide information on the benefits of the Scheme, outcome from the ongoing scope review and how things will move forward under the SEC (subject to the approval of MP111).	SMDA agree and will be able to do this once funding is secured.
Utilita	Large Supplier	-	
Scottish and Southern Electricity Networks	Network Party	-	
Drax Group (Haven Power and Opus Energy)	Small Supplier	<p>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 an enduring Scheme that delivers the necessary test assurance.</p> <p>The concept of the SMDA 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 benefits are limited, and this is unlikely to be improved by changing the funding model and governance alone. It is our view that a</p>	SMDA agree and will be able to do this once funding is secured.

Question 2			
Respondent	Category	Comments	
		full review is needed for consumers and the wider market to benefit from a value for money, enduring Scheme.	
British Gas	Large Supplier	<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 governance arrangements and that the fixed cost element of the scheme is equitably recovered.</p> <p>We have some additional comments to make on more specific aspects of the proposal:</p> <p>Proposed Governance</p> <p>We are supportive of the proposed initial governance structure and the continuity that maintaining existing SMDA Board and Management Panel representatives will bring. However, we expect that, once the scheme has successfully transferred, the SEC Panel will look to review the arrangements. For example, we would expect that smaller suppliers and Distribution Network Operators would want to be more involved. A greater level of industry representation will help to build the scheme further and ensure that it is as beneficial to all parties.</p> <p>Charging Arrangements</p> <p>We are supportive of the proposed arrangements for fixed costs and for test fees. The socialisation of fixed costs via DCC charges is aligned with general SEC activities and we see no reason for these costs to be treated any differently. The cost allocation is 'fair and proportionate' across the supplier community, as mostly based</p>	

Question 2			
Respondent	Category	Comments	
		<p>on market share, and the DNO allocation reflects the overall level of benefit that they are deemed to have from the smart programme. As device testing supports delivery of smart metering benefits, this is also an appropriate allocation.</p> <p>Implementation Costs</p> <p>As a supplier, we will not face any implementation costs for SECMP0111 other than those incurred by SECAS for administrative activities. We will receive our own allocation of the fixed costs via DCC charges on an ongoing basis but accept that those costs are being shared and allocated in an equitable manner.</p> <p>Implementation approach</p> <p>We are supportive of the short timescales for implementation following a decision by Ofgem.</p> <p>Legal Text</p> <p>Our comments during the refinement phase have all been successfully dealt with and we have no further comments to make on the legal text.</p>	
NMi Certin B.V.	Other SEC Party	Confidential comments provided	