

Representation

Draft Modification Report

0430: Inclusion of data items relevant to smart metering into existing industry systems

Consultation close out date: 07 February 2013

Respond to: enquiries@gasgovernance.co.uk

Organisation: ScottishPower Energy Management

Representative: David McCrone

Date of Representation: 08 February 2013

Do you support or oppose implementation?

Qualified Support

Please summarise (in one paragraph) the key reason(s) for your support/opposition.

This modification is similar in nature to the equivalent proposed data items for electricity (DTC CP 3362). ScottishPower originally rejected these changes on the basis that the security model for the programme had not been finalised. With no defined baseline for security, there is the possibility that the proposed models would impact the DCC's requirements for registration data. We understand that further discussions were to be had with DECC with a view to confirming that the data items proposed matched the underlying security model. As we are unable to confirm that these have been concluded and a baseline for the security model has been achieved, we are only able to provide qualified support on the condition that this is resolved as a matter of urgency.

Are there any new or additional issues that you believe should be recorded in the Modification Report?

As stated above we believe that the issues around the lack of a baselined security model need to be resolved. While there may have been discussions in the intervening period, we are not aware that any conclusion has been reached.

0430

Representation

08 February 2013

Version 1.0

Page 1 of 3

© 2013 all rights reserved

Relevant Objectives:

How would implementation of this modification impact the relevant objectives?

The modification will allow suppliers to accurately identify where there is a Smart Metering System installed at a property. This will ensure that customers at such properties can be offered the most relevant terms, as well as meaning that shippers/suppliers are able to act appropriately based on the type of meter installed at a property. This will help to facilitate the efficient operation of the market and therefore further effective competition between shippers and suppliers (relevant objective d).

Impacts and Costs:

What analysis, development and ongoing costs would you face if this modification were implemented?

As well as the costs identified within the ROM, we would need to make a number of changes to our internal systems and processes. We do not have a figure for these costs at this time.

Implementation:

What lead-time would you wish to see prior to this modification being implemented, and why?

We would require some lead time prior to this modification being implemented given the system and operational changes it will introduce as a result. The modification does not specify an implementation date but in an effort to be consistent with the electricity change, we believe this date should be set around the same time (November 2013). This would keep the two services aligned and ensure that the changes were in place across both fuels in preparation for industry testing.

Legal Text:

Are you satisfied that the legal text will deliver the intent of the modification?

Yes.

Is there anything further you wish to be taken into account?

Please provide any additional comments, supporting analysis, or other information that that you believe should be taken into account or you wish to emphasise.

The modification assumes that the SMSO Entity ID will have a field length of 3. We note that in the corresponding electricity change this is 4. We would suggest that if registration were to be centralised at a future date (as was the original intention for the DCC), it may be prudent to ensure these are aligned from the beginning.

0430

Representation

08 February 2013

Version 1.0

Page 3 of 3

© 2013 all rights reserved