



3rd Floor North
200 Aldersgate Street
London EC1A 4HD
Tel: 03000 231 231

citizensadvice.org.uk

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Dear Duncan,

Response to BEIS consultation on SEC changes to enable the provision of a SMETS1 service by the DCC

Thank you for providing us with an opportunity to comment on changes to SEC, which would enable SMETS1 services to be delivered by the DCC.

Operational functionality and access

We are in agreement with BEIS that, in the event of a split supply premises, the electricity supplier should have responsibility over the communications hub. This approach has the advantage of clearly defined responsibilities, whilst avoiding overly burdensome processes.

However, it is crucial that appropriate safeguards are put in place to avoid unauthorised access to personal data. Where possible, we would also expect energy suppliers to handle any problems, without using the consumer as an intermediary. If consumer engagement is required, the situation should be clearly and appropriately explained by energy suppliers to avoid confusion.

Security amendments

The amendments to security in Section G are necessary and welcomed. We suspect not all energy suppliers will need to be mindful of the additional requirements just yet. However, the inevitable churn of meters may mean that more will need to engage in the future. Clear guidance should be made available to these suppliers, detailing their obligations, when appropriate.

Elective communication services

Introducing elective communication services could bring some positive benefits to consumers. But it is important that these services do not result in duplication and multiple payments for the same request (thus causing an extra cost which is ultimately borne by consumers). It is also essential that the delivery of new elective communication services is carefully considered: existing DCC resource that has been committed to the rollout should not be compromised.

Transition

It seems appropriate to extend current SEC requirements, licence conditions and powers until 31 December 2020 or the Completion of Implementation (whichever is the earlier). We would encourage continued engagement with the SEC panel to ensure appropriate continuity, when the Secretary of State's powers cease.

Migration of SMETS1

We cautiously accept the scope of the Transition and Migration Approach Document (TMAD), provided there will be a thorough, robust and fair consultation process. This process should take into account the views of all parties and should pay heed to the costs of enrolment and potential ramifications to the final customer experience. We would also expect the document to stress that the customer experience should be consistent across all suppliers, as far as reasonably possibly.

We are more than happy to discuss any comments made in this letter, in person, should you wish to do so.

Yours sincerely,

Rajni Nair

Senior Policy Researcher