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Dear DCC team,

Proposed changes to DCC's Implementation Milestones

Thanks for the opportunity to respond to your consultation. Our responses to the questions are enclosed and we would like to raise the following overarching comments.

Consultation timing

Our understanding is that the DCC Licence as currently drafted only allows for the Implementation Milestones (IMs) to be reviewed on one occasion (see paragraph 49 of DECC's March 2015 New SEC Content Consultation). Given that Part B of the November 2014 DCC re-planning consultation contained a review of a number of Implementation Milestones we did not therefore expect to see any further changes of this nature. Whilst we acknowledge that DECC are considering amending the drafting of the DCC Licence to enable more than one Implementation Milestone review to be undertaken (see March 15 New SEC Content Consultation Question 8 and related text), we believe that it is premature of the DCC to issue this DCC Implementation Milestone consultation now. We believe that in effect this constitutes a second review of the Implementation Milestones, in advance of the publication of DECC's decision on this issue.

Rationale for changing IM titles and criteria

Whilst we understand that the Implementation Milestone Due Dates need reviewing and amending in order to align these with JIP v2.0, we note that within this consultation the DCC is also proposing to amend the Implementation Titles and Criteria at this time. Insufficient rationale and evidence for these proposed changes has been provided by the DCC within this consultation to allow assessment of the proposed solutions against defined issues with the current definitions.

Timing of the changes

We have a concern that further, and potentially repeated, amendments to be made to the Implementation Milestones will then inevitably lead to change or risk to the JIP. At this stage of the Programme, it is essential that all Parties have certainty and stability in terms of the scope and timing of implementation stages. Any changes and risks to milestones must therefore be centrally managed in the DECC Programme to allow a holistic, agreed view of impacts and mitigations.

Knock-on effects to other industry Parties

The proposed changes in this consultation imply risks on both scope and timing of delivery in each stage of the testing process and early rollout. At its most severe, the milestones relating to provision of early services for rollout have the potential to distort the competitive energy market and put Suppliers in breach of their Licence through no fault of their own. The consultation does not consider the impacts on the overall Programme and are risks to the JIP milestones which impact solutions,

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commercial contracts and implementation Programmes of industry Parties. As such, we believe this risks should be managed through DECC governance via the Implementation Managers Forum rather than pushed out via the mechanisms listed in this consultation.

Better achievement of principles

We note that DCC advise that in undertaking the general review of the Implementation Milestones that they have sought to follow the principles below:

- Maintaining the simplicity of the current Implementation Performance Regime;
- Aligning DCC incentives with key milestones in the JIP;
- Maintaining the risk profile agreed during the licence application process;
- Aligning DCC incentives with the provision of value to the consumer; and
- Ensuring IMs are unambiguous.

It must be noted however, that there is a lack of clarity within the consultation regarding how the implementation of each of the proposed IM amendments will better achieve these principles than the current arrangements.

As specified in our responses to the questions, we believe the proposals to potentially split the implementation stages into geographic regions significantly increases the complexity when these stages already involve dozens of Parties. In addition, the suggested time slips in the Tapering Model for each milestone drives risk and uncertainty into the industry, which will duplicate costs. We believe the proposals will duplicate risk in multiple industry Parties where the associated costs are ultimately borne by consumers. We therefore believe the proposals have an effect that directly opposes the principles above.

Proposals to split Implementation Milestones by Region

Within this consultation document, the DCC are proposing that a number of the IMs should be split down into regional categories with little justification for this recommendation. The potential for test stages to be split by region implies that Parties will have different areas of testing in different stages and potentially different solution maturities. When those test phases include industry Parties, it is not clear how this complexity would be managed over dozens of parties who will be at different stages of solution maturity. If the split region proposal is applied to early rollout, it could put Suppliers in breach of their Licences through inability to meet enforced rollout plans and could distort the market.

Amendments to the “Tapering Model”

The consultation lists suggested timescales in the “Tapering Model” for each Implementation Milestone. We are concerned that these specific timescales represent significant increases in the time period over which the Model applies. The consultation suggests that these represent possible late delivery but some are after the “backstop” of October 2016 as set by DECC following the recent re-plan. We therefore believe the Tapering Model should be representative of the risks to the JIP milestones so that they can be managed centrally so that impacts are assessed and valued holistically rather than constrained to the impact of lost margin. We therefore believe the mechanism of penalties and recovery sits with the Authority.

This response is not confidential.

Yours sincerely,

Elizabeth Kenny
Smart Industry & Compliance Manager

Q1 What are your views on the proposed recovery mechanism and the alternative approach set out above? Please provide rationale for your response.

We do not support the proposed recovery mechanism

Rationale for change

We note that DCC acknowledge that under the current model the recovery of margin for “catching up” would only be achieved if the proposed “go live” milestone (currently IM12 and proposed IM10) is achieved by the Implementation Due Date. In our view this current model provides the DCC with a clear incentive to ensure that they achieve the “go live” milestone.

Within this consultation, DCC are proposing some fundamental changes to this model however, for which very little explanation or justification has been provided. We are strongly of the view that any amendments to this agreed Recovery Model, which forms part of the current DCC Licence, fall under the remit of the Authority not the Licensee.

Regional split

We note that DCC are now proposing that the IMs should be sub-divided into two Region categories and that the Recovery Mechanism should be amended to reflect this regional split. We would like to point out that the Programme has been established and developed with a national rollout in mind and not a regional one. From an industry perspective then, it is the delivery of the overall solution at a national level that is important.

The timeline risks suggested by this consultation via the Tapering Model potentially conflict with central planning assumptions and re-plan decisions. Moving to a regional delivery model as is potentially being proposed by the DCC within this consultation, could have multiple knock-on effects, including increased risk, for all Users which have not been considered within this consultation. For example, not all suppliers’ portfolios are evenly spread across the country and so some may be disproportionately impacted by the late implementation of milestones in an area where they have a greater density of customers. In this regard further consideration is required for Network Operators who are geographically bound.

Tapering Model & Recovery mechanism

We have a number of concerns with regarding to the Tapering Model contained within section 3.2 of the consultation document, and refer you to our comments on this matter within our Executive Summary. Where we have concerns regarding the application of the Tapering Model to specific Implementation Milestones, we have addressed these in the relevant questions.

We note that the risks are expressed only in direct relation to the Implementation Milestones and the DCC margin that is at risk for each. The potential impacts of slippage to these milestones could be significant for the overall DECC Programme and GB plc. We would welcome the DCC’s recognition of these additional risks should milestones not be met by one or all of the organisations within the DCC ecosystem.

Question 2 – Do you agree with the proposal for the recovery of IM4, IM5, IM6 and IM7, where the Time Factor was greater than 0, to be proportionate to the tapering of the proposed IM10? Please provide rationale for your response

We do not agree with the proposal

Rationale for change

In our view, the proposals that change the conditions under which recovery of lost margin are significant amendments to the current terms of the DCC Licence and as such we believe falls within the remit of the Authority rather than the Licensee.

No rationale for the proposal has been provided other than DCC stating that they “consider that this approach would ensure that incentives steadily ramp up for recovery” and that “Furthermore, this approach would ensure that the incentive remains for DCC to achieve “go live” as soon as possible, even if it is later than the IM Due Date”. We require clarification as to why DCC does not believe that the mechanism currently in place is still appropriate, and ask that how a steady ramping up of incentives over time will ensure that milestones are met at the earliest opportunity?

Tapering Model & recovery mechanism

As we have stated within our Executive Summary we have a number of concerns regarding the Tapering Model information provided within Section 3.2 of the consultation which we believe need to be addressed. We have expressed concerns for the model against specific Implementation Milestones in the relevant questions.

Q3. Do you agree with the proposal for incentivising readiness for the start of Systems Integration Testing? Please provide rationale for your response.

We do not agree with the proposal

Rationale for change

DCC advise that they consulted upon IM8 and IM9 in the November 14 DCC Re-planning consultation, with IM8 and IM9 being as follows:

- IM8 - “DSP Ready for Systems Integration Testing with Licensee” and the due date is 31 Oct 2014
- IM9 - “DSP and CSP Ready for Systems Integration Testing” and the due date is 28 November 2014.

We note that DCC are now proposing that IM8 and IM9 should be replaced with new milestones IM8a and IM8b respectively, where:

- IM8a - “Licensee is ready for Systems Integration Testing in the North Region”. Proposed Implementation Due Date is 1 September 2015 (to align with JIP milestone); and
- IM8b - “Licensee is ready for Systems Integration Testing in the Central and South Regions”. Proposed Implementation Due Date is 1 September 2015 (to align with the JIP milestone).

As can be clearly seen from the above, the new IM8a and IM8b remove all reference to the DSP and the performance of the two CSPs needs separating. We are therefore asking for clarification as to why the DCC believes that such a change is required.

Regional split

We are concerned that the proposal to divide the Implementation Milestones into regional targets could have knock-on effects, which drives complexity and risk into all stages of test and implementation of the overall Programme.

For example, if one CSP misses the target IM and commences SIT at a later date, how is the “dual track” of testing that would be generated be managed? Would the later CSP have less time to test the solution or would the start of UIT be similarly staggered by default? In either instance, the DCC is providing a choice between solutions that have not been robustly tested and a more complex set of test conditions in UIT. We do not understand how this situation improves the principles listed by the DCC regarding simplicity.

Tapering Model & Recovery mechanism

The DCC states in section 5.6 that the Proposed Time Factors apply at 1st September 2015 (as per the JIP milestone JM_2036), October 2015, November 2015 and December 2015. These dates would represent significant slippage that could profoundly impact subsequent test phases and implementation stages. As such, these risks should be recorded against the JIP milestones so that the risks to all implementation Parties can be centrally managed.

Consultation accuracy

We would like to take this opportunity to ask for clarification around the information provided within the consultation with regard to the SIT Approach document dates. The Proposed Implementation Milestone criteria for IM8a and IM8b state that “The functionality to be tested in each phase of SIT has

been set out in an annex to the SIT Approach Document which has been approved by the SEC Panel **no later than 30WD prior to the commencement of SIT** (or a later date agreed by the SoS). However within paragraph 49 of the consultation document it clearly states that the “DCC is required to develop the SIT Approach Document in accordance with Section T2 of the SEC. The document is required to be approved by the SEC Panel and then published by DCC **no less than 3 months before the start of SIT**”. The proposed implementation milestone timescales with regard to the SIT Approach document (no less than three months) therefore do not appear to aligned with the SEC requirements (no less than 30 WD). It must be noted that JIP milestone JM_2036 SIT Commences is set at the 1st September 2015, which is less than 3 months from the date of this consultation response.

Finally, the statement in section 5.2 states that there was support for the proposed IM Criteria, we would like to point out that for clarification we were not supportive of this as part of our response to the DCC consultation in November 2014.

Q4 Do you agree with the proposal for incentivising the readiness for the start of Interface Testing? Please provide rationale for your response

We do not support the proposal

Rationale for change

DCC advise that currently IM10 and IM11 incentivise the completion of SIT and Interface Testing respectively. The DCC is now proposing that IM10 (Completion of SIT – Imp due date of 31 March 2014) should be amended to become:

- IM9a Licensee is ready for Interface Testing in the North Region; and
- IM9b Licensee is ready for Interface Testing in the Central and South region.

Both with a proposed Implementation Due date of 2 Feb 2016 (as per JIP milestone JM_2052).

DCC advise that the above will incentivise the start of Interface Testing as opposed to completion of SIT which is aligned to the new delivery strategy which introduced an overlap between SIT and IT. DCC believe that this change will increase alignment with the JIP and ensure that DCC's incentives are aligned with Large Supplier Obligations to be ready for the start of interface testing.

The definition of Licensee includes Trusted Service Provider as well. However, the TSP/SMKI solution elements need to be ready some time before IT in order to be able to start SREPT by 2nd November 2015. We therefore ask that clarification is provided on how this will be managed.

DCC advise that the Interface Testing Approach Document (which is referenced in the Implementation Milestone criteria) must be approved by the SEC Panel and published by the DCC no less than 6 months before the start of interface testing. DCC advise that their intention is to “move to Interface Testing with the functionality set out in Release 1 subject to any functional de-scoping decisions taken by the Programme’s transitional governance. DCC considers that the scope of Interface Testing could be set out and agreed as an annex to the Interface Test Approach Document. This annex could be agreed by the SEC Panel at an appropriate time before the commencement of Interface Testing”.

We consider the proposed approach to be too vague and leaves too much uncertainty for the industry and the Programme at a time when stability and certainty are essential. This aspect (paragraph 62) relates to scope rather than implementation dates and as such we believe should be ruled out of scope for an Implementation Milestones consultation.

Regional split

We do not believe there is sufficient rationale for the start of Interface Testing to be split into regions. If preceding phases are similarly split, there may be knock-on consequences for Interface Testing. Similarly there may be unresolved issues arising in SIT which require longer to resolve and regression test; this is an existing risk which could be mitigated by the use of contingency, centrally coordinated and governed.

The proposed approach could allow IT to start in a region where SIT is still in progress for the other region, allowing IT to commence on a solution that is not completely tested. Consequently, this could invalidate or cause rework to UEPT; We note that the proposal to overlap SIT and IT as per the re-plan was only to overlap the SIT-UAT element not SIT-Solution testing.

A delay to CSPs entering IT could also impact the suppliers’ ability to start end-to-end testing as this

could not be completed until the complete DCC solution is ready. Suppliers have already expressed the need to test with devices so that the risks of rolling out to consumers with immature solutions are minimised. This requires all CSPs to have devices and solutions available to support User testing in both UIT and End-to-End phases.

We believe there is a lack of consideration by the DCC within this consultation where splitting IMs by region will directly impact all parties needing to undertake Interface Testing. This is a significant shortcoming of the consultation which should be addressed.

Finally, we do not believe the proposals better achieve the principles of simplicity and cost efficiency. We would welcome clarification from the DCC on how testing would be managed in Interface Test phase where DCC solutions split by region could be at different stages of test maturity. This would create a natural split of tests at the same time as Suppliers and Electricity Networks are interfacing with the same environments. We believe this will drive complexity, confusion and cost into the test phase.

Tapering Model & Recovery mechanism

DCC are proposing that the percentage weighting for IM9a and IM9b should be set to 10% each (i.e. a total of 20% for IM9a + IM9b), but we have not seen any justification for this or any transparency of the assessment that the DCC may have undertaken. Further clarification is therefore required.

DCC are proposing that the "Tapered" Model for IM9a and IM9b should run from 2nd Feb 2016 (as per JIP milestone JM_2052) through to 2nd November 2016, an 8 - month period, with 2 stepped increments at 2nd May 2016 and 2nd August 2016.

We seek clarification as to why the stepped increments should be quarterly. We also note that the date of November 2016 falls beyond the "backstop" date for contingency, whereby DECC have already indicated a full Programme re-plan would be required. As the milestone in question indicates the start of Interface Test, we have significant concerns for the impacts of this to the overall Programme and rollout.

Q5 Do you agree with the proposal for incentivising the readiness for live Enrolment and Communication Services? Please provide rationale for your response

We do not support the proposal

Rationale for change

We do not believe that sufficient information has been provided to indicate the unsuitability of the existing milestone criteria. In addition, we do not believe that some of the criteria are appropriate for DCC Implementation Milestones.

The new proposal contained within this consultation is suggesting that this IM should be amended (in light of the DCC Re-planning consultation) to:

- IM10a “Licensee is ready for commencement of live Enrolment and Communication Services in the North Region”; and
- IM10b “Licensee is ready for commencement of live Enrolment and Communication Services in the Central and South region”

The proposed Implementation Due Date for both of these is proposed as being 1 April 2016 to align with the JIP milestone JM_2016 rather than the central planning assumption at August 2016 (JM_4052). The intervening period will allow Users to conduct End-to-End testing if they wish before rolling out to consumers.

DCC are proposing that the Implementation Milestones Criteria for IM10a and IM10b should be as follows:

- “All Exit Criteria as described in the Interface Testing Approach Document have been achieved. The Exit Criteria will have deemed to have been met by the SEC Panel in accordance with SEC T3.27”;
- “In relation to all compliant CH Orders for the month prior to DCC Live, a substantial majority of Parties have confirmed that Consignments of CH deliveries are compliant”; and
- “The Routine Live Enrolment and Communication Services Criteria have been met by the SEC Panel and the SEC Panel has approved that these have been met by the Communications Services Provider; the Trusted Service Provider; the P&C Provider and the Data Services Provider”.

The Exit Criteria as described in the Interface Testing Approach Document must include at least one Large Supplier to have completed IT successfully. This does not change in the IM criteria so is not clear why changes are required.

We cannot comment on the appropriateness of the Routine Live Enrolment and Communication Services Criteria as it is still to be drafted and released to the industry. The document must form part of the overall Programme where industry parties can review and comment, particularly if its intent is to provide the conditions by which the DCC will have to meet in order to prove its capability to provide the Live Enrolment and Communication Services.

We do not believe the criteria for compliant deliveries of Communications Hubs are appropriate in this milestone. Firstly, “substantial majority of Parties” requires further definition in light of the recent DECC consultation on Rollout Strategy, where only Large Suppliers are required to complete Interface Testing at this time.

Secondly, the milestone at April 2016 does not mark the central planning assumption for the start of mass rollout; this will commence at August 2016 following a period where Suppliers can choose to undertake End-to-End testing. As per the Smart Energy Code, Suppliers will take delivery of Comms

Hubs one month prior to installation. Therefore, delivery is not likely to take place until one month prior to the Central Planning Assumption, i.e. July 2016.

Regional split

As stated above, we believe the period between the DCC Live milestone in April 2016 (JM_2016) and the Central Planning Assumption for DCC Live in August 2016 (JM_4052) will facilitate Supplier End-to-End testing prior to rolling out the new technology to consumers.

It is not clear from the consultation whether End-to-End capabilities will be split during this time period, as suggested by the IM criteria. For example, if a CSP is not able to provide services at the target milestone date, would there be technology and solutions available in all regions in a stable enough form to facilitate multiple party testing? We would welcome clarification from the DCC on which functionality could be at risk so that the industry can assess the reciprocal risks of such an arrangement.

Tapering Model & recovery mechanism

DCC are proposing that the Tapered Model for IM10a/b should run as April 2016 (as per JIP milestone JM_2016) through to January 2017 with inflection points at August 2016 and October 2016. We note that the existing Implementation Milestone (IM12) sets the stages as 0-3 weeks, 3-6 weeks, 6-9 weeks and beyond 9 weeks. We would welcome clarification from the DCC of why this has changed from 9 weeks to 8 months and how this better incentivises timely delivery.

DECC have concluded that October 2016 represents a "backstop" to the use of contingency and the provision of Live Enrolment and Communication Services. Forecasted delivery after this point should be subject to a full Programme re-plan as prompted by the Senior Responsible Officer at DECC. We therefore invite clarity on why the timescales in this consultation extend to January 2017.

Any delays to delivery of full functionality of Live solutions directly impacts Supplier rollout plans. These are enforceable by Supplier Licence from January 2016 so certainty is imperative. Where provision of DCC Live services are delayed, it puts additional strain on Foundation stage solutions, which drives cost and risk into all Suppliers and GB plc. In addition, confidence in SMETS2 solutions could be undermined, particularly if timelines start to coincide with the delivery of 868MHz HAN and SMETS3.

DCC have proposed that the percentage weighting for IM10a/b should be set at 17.5% each. The IM12 weighting was 15% so the proposals represent a significant increase. We seek clarification for the rationale for this adjustment.

Q6 Do you agree with the proposal for incentivising implementation beyond live Enrolment and Communication Services? Please provide rationale for your response

We do not support the proposal

Rationale for Change

DCC advise that their proposed delivery strategy recognises the potential need to apply constraints to the provision of initial live Enrolment and Communication Services. To align with this DCC is proposing that a new IM11 (Initial Stabilisation Complete) should be developed, with the proposed implementation due date for IM11 being “3 to 6 months after IM10 is achieved”, which could be mid 2017. This will impact rollout plans that have to be submitted by suppliers by January 2016 that are backed by licence conditions. With these obligations being placed on suppliers it is therefore clear to see that certainty is required as soon as possible, to establish rollout plans which this proposal cannot provide.

DCC advise that the proposed new IM11 should “incentivise the DCC to work with Users to stabilise systems and processes in a timely manner, including the removal of constraints (if applied) at the earliest reasonable time”. DCC state that they believe that the work being undertaken with DECC and its stakeholders regarding the processes and governance required for the application of constraints needs to complete prior to IM11 being defined. Their initial thoughts with regard to IM11 criteria however are:

- DCC develops and publishes a document, in consultation with stakeholders, setting out the criteria for the removal of constraints, if applied;
- Any temporary constraints are removed through approval by the agreed governance forum; and
- If no constraints are proposed by DCC prior to the Implementation Due Date, the proposed IM11 would be considered to be achieved.

We require further information in order to better understand how the development of a document that develops IM11 criteria can itself be a criteria.

DCC state that they believe a percentage weighting of 5% for IM11 would be appropriate, recognising that the Operational Performance Regime will predominantly drive the performance of the DCC in this period. However again no supporting information has been provided to substantiate this view, we would therefore ask that further clarification is provided

Timescales

As per Question 5 of this response, DCC Live could be delayed in at least one Region to January 2017. This has a knock-on effect to IM11 as discussed in this question. As such, the Implementation Milestones could present a risk of constrained rollout for Suppliers into mid-2017. This presents a risk to Suppliers of being in breach of Rollout plans which are bound by Supplier Licence. In addition, the constraints could compress early rollout and moves volumes “to the right”. This effectively shortens the deployment period and presents a material risk to the rollout as a whole. We do not believe the percentage weighting of IM11 reflects the criticality of the milestone delivery to the overall achievement of the Smart Metering rollout.

Q7 Q7 What are your views on the proposal for the proposed IM11 to be sub-divided by two region categories and the alternative approach set out above? Please provide rationale for your response

We do not support the proposal

We do not agree with the DCCs view that by sub-dividing the proposed IM11 into two regions will strengthen the incentives to remove constraints as soon as possible. Further, we consider that the issue of constraints has still to be discussed and is therefore an assumption only; we do not believe it is appropriate for the DCC to change IM criteria based on that assumption at this stage.

Suppliers are developing national deployment plans that follow the central planning assumptions for timescales and baseline scope. The deployment plans become bound by Licence in January 2016 and certainty of timescales and scope must be known by then if later constraints are not to generate unavoidable Licence breaches.

We ask the DCC to note that Suppliers have national customer bases but may have regional bias. Release of constraints by region would affect the geographic spread of customer bases and therefore has the potential to distort the energy market. It is therefore imperative that decisions affecting the scope and timing of milestones must be discussed and agreed centrally under the appropriate Programme governance.

Q8 Do you agree with the proposal to remove the current IM14? Please provide rationale for your response.

We do not support the proposal

We disagree that the concepts of UIT and market entry phases no longer apply and consider these part of the exit criteria that are described in the Interface Testing Approach document that is referenced within section 7 of this consultation as part of the DCCs proposal to replace IM12 with IM10a and b. It is our understanding that it is only the terminology that has changed and therefore only alignment with the JIP is required. Again, we ask that further clarification is provided as to why the DCC wishes to remove this current milestone.

Q9 Do you agree with the proposal to introduce the recognition of external dependencies, and the concept of matters beyond DCC's reasonable control, in the Implementation Performance Regime (Schedule 3 of the Licence)? Do you have any views or suggested changes/additions to the provisional list of dependencies provided above? Please provide rationale for your response.

We do not support the proposal

We recognise the challenges faced by the DCC but would argue that these are also shared with all other parties that are currently engaged in developing the Smart Metering Implementation Programme. Issues such as stability and robustness of the design baseline, readiness of device manufacturers, test and audit clearances are common to both the DCC and Suppliers. Whilst the DCC lists dependencies on Suppliers as Prospective Users, Suppliers are equally dependent on the readiness of the DCC for timely delivery of agreed scope.

For example, the external dependencies outside of the DCC's control that have been cited include the completion and stability of DECC deliverables (e.g. GBCS, CHTS, SMETS and SEC). These specifications are required by all parties' in order to develop their systems and processes. In order to progress the Programme, Suppliers have been expected to develop their solutions based on incomplete versions of these key documents. As the incumbent, monopoly service provider for the Programme we would envisage that the same expectations should apply to the DCC.

It is the role of the DECC Governance groups to manage key milestone dependencies and the risks that arise from them. We do not believe it is appropriate for DCC Implementation Milestone criteria to seek to compensate for these outside of the correct Governance process. We would also expect any mitigating actions to be taken into account by the Authority when reviewing performance by the DCC and other industry Parties in their part of delivering the Programme and rollout.

Q10 Do you agree with the overall proposal to amend the Implementation Milestones? Please provide rationale for your response.

We do not support the proposal to amend the IM criteria but acknowledge the need for the existing dates to be reviewed post re-plan

We believe that the timing of this consultation is premature and will only serve to add uncertainty to the Programme at this stage. We do not see the package of change that is being proposed as benefiting the overall Programme and the progressions of the industry solutions that we are all trying to develop. We do not see how the range of proposals outlined within this consultation better achieve the principles that have been outlined in section 2 other than allowing the DCC to better manage its risk profile, that may provide some benefit to the Programme but this can only be established if a holistic view of the whole Programme is established.

We would welcome open discussion in an appropriate industry forum to address the issues raised in this consultation under the auspices of DECC's Programme governance.