

Department for Energy Security and Net Zero  
55 Whitehall  
London  
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United Kingdom

Via Email to: Funmi Brady & SSES Consultation Team

Cc: Martin Adams

05/02/2026

Dear Funmi,

We are pleased to attach this covering letter to BEAMA's response to the Smart Secure Electricity Systems (SSES) Programme: first phase energy smart appliances regulations consultation.

BEAMA is the UK trade association for manufacturers and providers of energy infrastructure technologies, systems and services. In the Energy Smart Appliance (ESA) space we represent the full range of manufacturers from heat pumps and smart heating controls to batteries and electric vehicle charging infrastructure for homes, the public and fleets. As the only trade association covering this breadth of technologies, we are uniquely placed to offer insight across the ecosystem and to support a joined-up approach to delivery for the SSES program.

In summary, BEAMA are highly supportive of the intent of the regulations to support a smart and secure electricity system, through increased consumer flexibility.

We however, on behalf of our member manufacturers must highlight below how the draft regulations as drafted will have unintended consequences that will result in significant non-compliance with the regulations when they come into force. The timelines given are not sufficient to match changes to product development and the manufacture of a new product or launch of an improved service and must therefore be extended. With the amendments and clarifications required we list below, and additional amendments listed in our full response our members anticipate that there will not be enough clarity by the most important deadline for our members, the new financial year to enable informed investment decisions and enable change to their products in time. Therefore, we outline below why we cannot support the current timelines set in their entirety.

**Randomised Delay:** randomised delay **should not** take effect for EV manufacturers 6 months after the regulations are laid. Given the changes in interpretation that conflict with existing industry understanding, there will be a need to change the product. In our response we also detail how there is a need for a **permanent override** as randomised delay is not suitable for all scenarios. The two exemptions listed by DESNZ in the

consultation are not sufficient or suitable for an evolving market. For example, as it stands every EV plugged in regardless of time of day, despite being inherently random will have a randomised delay. Or when charging an EV through roof top solar, optimising charging schedules for maximum solar power, a randomised delay may prevent a consumer maximising the amount of power they can take from their solar panels to charge their vehicle. For heat manufacturers there is also strong support for randomised delay to be redrafted to exclude EHA's, which will likely be on all the time, and therefore constantly at risk of randomised delay, which is highly likely to impact on consumer comfort.

**MIR Class B:** We are grateful for DESNZ answering our clarification questions ahead of the response deadline. However, with elements of MIR still to be decided by DBT, we cannot at present support MIR coming in to force in December 2027. There is now insufficient time for manufacturers to achieve MIR compliance and have their product tested for compliance. We understand there are only a handful of testing centres in the UK, who are not used to testing charge points, EHA's, etc and so will likely struggle with the increased demand, particularly from products that are less commonly if ever tested by them to date. A **voluntary period** is strongly suggested to be introduced from December 2027 for two years; this represents the worst-case scenario for manufacturers to build kit if they are yet to start their product cycle.

**ETSI EN 303 645:** BEAMA are supportive of ETSI EN 303 645 as one way of showing cyber resilient infrastructure. However, we believe there are equivalents that DESNZ must urgently clarify as equivalent. BEAMA's preferred method is EN 18031 which our members see as achieving the same result without the need for going through a completely new, costly process to establish the same levels of cyber security and resilience that they had already.

**Facilitating competitive, well-functioning markets:** The stated purpose of SSES is protecting the electricity grid, enabling consumer confidence and choice in demand-side response, and facilitating competitive, well-functioning markets. However, as it stands all the costs associated with the ESA regulations are on manufacturers of ESAs. Whereas Direct to Vehicle services are able to bypass the charge points inbuilt flexibility services, meaning an ESA manufacturer can no longer participate in the flexibility markets, a key incentive to operate in the UK market. As it stands, we estimate based off publicly available data that around 20% of EV's in the UK use a Direct to Vehicle Service and this market is likely to increase. With no cost burden on D2V operators in this space, the market will become immediately less competitive as future investment by ESA EVSCP manufacturers will be harder to forecast with declining market size despite increasing charge point sales, and decreased profitability. DESNZ must carefully consider how to redress this balance to maintain fair market conditions.

**Urgent clarity and guidance:** It is well understood and shared in our joint letter with a number of heat trade associations that manufacturers cannot begin making changes to the products until they see a final copy of the legislation, with draft legislation being subject to change, as we have seen in this consultation process. A number of questions have been raised through the process, BEAMA have responded to around 100 questions

from members on this consultation alone. It is therefore clear that additional guidance documents are urgently needed to provide guidance on compliance. For our heat manufacturers for example, the point around where to place tamper protection is still not clear enough for them to make an informed decision on building it into their products.

With the above taken into consideration **BEAMA urgently call for:**

- For December 31st ,2027, to mark the start of a two-year voluntary period for compliance, marking December 31st, 2029, as the first date that enforcement can begin.
- Alignment between all EV Charging and other ESA regulations to December 31<sup>st</sup>, 2027, at the earliest.
- For further clarifications and guidance to be published as soon as is feasible to ensure manufacturers can make informed judgements on investment in new product specifications ahead of the new financial year where budgets will be decided. To support effective and enforceable implementation, the final regulations should be issued together with full supporting guidance.
- Continued engagement on ensuring competitive markets for our members.

I'd value the opportunity to discuss the points raised further, as soon as possible after the deadline after this consultation closes to support DESNZ in implementing these regulations and timelines where feasible and ensure our members concerns are addressed ahead of implementation.

Kind regards

Yselkla Farmer

CEO – BEAMA

A handwritten signature in blue ink, appearing to read 'Yselkla Farmer'.