

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

MP239 ‘Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP239 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	The solution proposed looks to resolve the identified issue with the two scenarios highlighted on the modification report when this would not be possible. The five functional business requirements listed on Annex A Business Requirements detail this what is required of the solution.
E.ON Next Energy Limited	Large Supplier	Yes	The proposed solution will not prevent device certificate misalignment from happening and this was always unlikely due to the nature of how generation of device certificates works on devices. However, the solution does provide more timely and efficient mechanisms for remediation supporting delivery of services to energy consumers.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	It enables Suppliers to update Certificates via the SSI rather than relying on raising DCC service requests.
EDF Energy	Large Supplier	Yes	We agree the proposed modification will address the issue raised.
Octopus Energy Ltd	Large Supplier	Agree	The proposal sets out clear steps which allow for the certificate misalignment to be corrected more readily than the current system.

Question 2: Do you agree that the legal text will deliver MP239?

Question 2			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	The legal text clearly defines the requirements for error correction and user defined access.
E.ON Next Energy Limited	Large Supplier	Yes	While the legal text is updated to reflect the new way of working there are no changes to obligations.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	-	We have not reviewed the legal text.
EDF Energy	Large Supplier	Yes	The legal text appears to clearly state how the new process will be delivered.
Octopus Energy Ltd	Large Supplier	Yes	-

Question 3: Do you agree with the proposed implementation approach?

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	We've been fully involved in the development of the modification, and fully support planned approach, resolution and outcome.
Scottish and Southern Electricity Networks	Network Party	Yes	Recommended dates for implementation allow for assessment.
E.ON Next Energy Limited	Large Supplier	Yes	An ideal implementation would involve full automation, but in the absence of this an SSI portal for raising misalignment issues in bulk is a considerably better approach than the current arrangement and will result in substantial time savings for all DCC Users and DCC partners.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	We accept that the earliest possible implementation is June 2026 due to the requirement to amend the DUIS and the 12 month lead time for doing so.
EDF Energy	Large Supplier	Yes	The Implementation approach appears well thought out with delivery methodologies specified etc.
Octopus Energy Ltd	Large Supplier	Yes	The proposed implementation approach appears to cover the key issues initially introduced.

Question 4: Will there be any impact on your organisation to implement MP239?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	We do not need to make any changes.	-
Scottish and Southern Electricity Networks	Network Party	Unsure	We assume by the scenario highlighted by the SEC mod when the supplier updates the device certificates this scenario is also applicable for replacing slots 6 & 7 for DNO's, we would like to understand if this proposed change will have a positive impact on misaligned DNO device certificates. It would also be useful to understand how many devices are misaligned over and above the 140,000 detailed on this modification proposal.	MP239's focus is on the Device Certificate associated with credentials generated by the Devices, e.g. a Certificate belongs to a Device, not a Remote Party. Therefore, any Certificate in the Device Trust Anchor Cell belongs to Remote Party, not the Device itself. The scope of MP239 does not cover any Certificates held in the Trust Anchor Cells. The DCC has noted that as slots 6 & 7 holds certificates for DNOs, it is possible for the DNO to resolve the misalignment by triggering SR6.24.1. The number of Devices with misaligned Certificates fluctuates at any given time, due to ongoing manual corrections by the DCC. SECAS has requested the DCC to try quantifying historic manual corrections, which may provide clarity on the number of Devices impacted.
E.ON Next Energy Limited	Large Supplier	No	There is little impact other than rollout of training to demonstrate how to use the new SSI interface. The time and effort involved is going to be affected by how DCC elect to implement access to the new tool. i.e. what	The DCC has noted these details would only be expected to be defined during the detailed design stage, which would then be shared with customers at the Design Release Forum.

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			level of access is required? Will it work similarly to SMKI repo access? This has not been indicated at this time.	
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	Staff will need to be trained on the new process and we will have to ensure that the SSI interface is available to appropriate users who will carry out the process.	-
EDF Energy	Large Supplier	Yes	Minor retraining and amendments to BAU processes.	-
Octopus Energy Ltd	Large Supplier	No	It appears that the proposal for MP239 covers automatically resolving some of these issues and preventing them in future. Any manual requirement from us will likely be less onerous than the current process of manual correction.	-

Question 5: Will your organisation incur any costs in implementing MP239?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No costs	See above.
Scottish and Southern Electricity Networks	Network Party	No costs	N/A
E.ON Next Energy Limited	Large Supplier	No costs	Implementation of this SECMOD would result in a reduction in unnecessary site visits to exchange meters where gains are unable to be completed. Additional confidential rationale.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Less than £100k	We do not expect any material costs from implementing MP239.
EDF Energy	Large Supplier	No costs	No significant costs as no system changes required, all amendments are internal.
Octopus Energy Ltd	Large Supplier	No	Cost savings will be made where we are able to resolve certificate misalignment issues which sometimes end in meter replacement. By avoiding this unnecessary meter replacement and keeping the meter on the wall, there is a cost saving to be made.

Question 6: How long from the point of approval would your organisation need to implement MP239?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No time required	See above.
Scottish and Southern Electricity Networks	Network Party	N/A	N/A
E.ON Next Energy Limited	Large Supplier	Very little time	But does depend on who can access the new SSI tools. DCC's procurement activity to replace specific services providers (e.g. DSP) will need to be considered to ensure any MP239 solution is maintained over the longer term.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	3 months	This will provide long enough to prepare briefing materials and ensure the correct staff had access to the SSI.
EDF Energy	Large Supplier	Nominal / Less than a week	No system changes required for EDF. Training and process changes should be implemented quickly.
Octopus Energy Ltd	Large Supplier	No Time needed	-

Question 7: Do you believe that MP239 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	We agree it will better facilitate General SEC Objective (a).
Scottish and Southern Electricity Networks	Network Party	Yes	This modification should better facilitate SEC Objective (a), as it will ensure that Devices are functioning as intended without replacing the existing Smart Meter.
E.ON Next Energy Limited	Large Supplier	Yes	This change would benefit a number of SEC objectives, but particularly in relation to energy consumer management and the ongoing efficient operation of smart meters, this change should only be seen as a win for everyone from the customer through to SECAS.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	We agree with the Proposer's view "that MP239 will facilitate SEC Objectives (a)1 as it will ensure that Devices at a consumer's premises is functioning as intended without replacing the existing Smart Meter".
EDF Energy	Large Supplier	Yes	The modification should lead to an increase in healthy meters in line with the SEC objectives.
Octopus Energy Ltd	Large Supplier	Yes	The proposal meets SEC objectives: a) by ensuring the operation and interoperability of smart meters in consumers' premises which might currently be restricted due to certificate misalignment. c) by allowing working smart meters with aligned certificates d) by ensuring that after a COS certificates are able to be aligned allows for fair competition for the supply of energy as all have equal opportunities.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP239 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	The quicker we can get the device out of a mismatched state (non comms), the quicker the customer will see a return to a full Smart service.
Scottish and Southern Electricity Networks	Network Party	Yes	This modification will ensure efficiency and functionality of meters at consumers properties.
E.ON Next Energy Limited	Large Supplier	Yes	This change provides us with a better route to green for non-communicating smart meters where the underlying cause is certificate alignment without the need to inconvenience a customer with a site visit. The change will also result in faster resolution of cos gain failures, restoring smart functionality to meters. Non-operating and cos gain failures are a current focus area for both DESNZ and The Authority.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	Consumers will benefit as this will reduce the risk that meters are non-communicating for extended periods due to certificate mismatches.
EDF Energy	Large Supplier	Yes	The modification would support the efficient operation of smart meters in line with the first SEC objective.
Octopus Energy Ltd	Large Supplier	Yes	We believe there will be a positive impact on consumers if MP239 is implemented.

Question 8			
Respondent	Category	Response	Rationale
			By resolving or allowing a mechanism to more easily resolve certificate misalignment issues, as MP239 suggests, more consumers will have working smart meters allowing them to gain the benefits associated with a functioning smart meter.

Question 9: Noting the costs and benefits of this modification, do you believe MP239 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	We think this makes sense. Currently there is a very longwinded manual process which can lead to long-term non-comms on meters. This would really help, and will directly avoid meter replacements etc.
Scottish and Southern Electricity Networks	Network Party	Yes	This will ensure more communicable meters moving forward without the need to replace meters.
E.ON Next Energy Limited	Large Supplier	Yes	-
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	Yes	There are sufficient meters affected by the issue to justify the cost, there are clear benefits to consumers and the efficiency of the Smart metering arrangements will be increased.
EDF Energy	Large Supplier	Yes	As per above replies, the costs and time to implement are negligible however there will be benefits to customers and DCC users which will outweigh these.
Octopus Energy Ltd	Large Supplier	Yes	The costs indicated seem reasonable when considering the volume of meters which could have certificate issues resolved by this modification. We note however that indicative costs vary largely between £161,000-£360,000 with no understanding of what would cause this to be towards the lower or high end of the range. We will monitor the proposed costs throughout the stages of the proposal considering the large range currently proposed.

Question 10: Please provide any further comments you may have.

Question 10		
Respondent	Category	Comments
British Gas	Large Supplier	Fully supportive of this mod. It will bring clear benefits to the whole supplier community and other parties (network operators etc.).
Scottish and Southern Electricity Networks	Network Party	N/A
E.ON Next Energy Limited	Large Supplier	We have significant concerns at the proposed implementation date of 2026 and would like to take the opportunity to underscore why this change is needed sooner. We sponsored and drove this SECMOD because of the significant operational pain and cost associated with the existing method of dealing with device certificate misalignment. Particularly in relation to failures within the change of supplier process where device certificate status is opaque and self-help impossible, we are forced to inconvenience customers with site visits and replace meters unnecessarily. Additional confidential rationale.
ENGIE Power Limited, ENGIE Gas Limited	Small Supplier	No further comment.
EDF Energy	Large Supplier	N/A
Octopus Energy Ltd	Large Supplier	-