



# Smart Energy Code

## Modification Report Consultation Responses: SECMP0004 'Inclusion of Device Serial Number data item in the Smart Metering Inventory'

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This document contains the detailed responses for the SECMP0004 Modification Report Consultation.

A summary of the responses is contained within section 7 of the SECMP0004 Final Modification Report.

If you would like any further information, or if you have any questions, please do not hesitate to contact **Samuel Browne** on **020 7090 7755** or at **secas@gemserv.com**.

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## 1. Views of Large Suppliers

| Summary of Large Supplier views against the SEC Objectives                                                                                                                                            |             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| General SEC Objective                                                                                                                                                                                 | Proposed    |
| a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.                     | ✓ 5 Parties |
| b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.                             |             |
| c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.                        |             |
| d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.                                                                  | ✓ 4 Parties |
| e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy. |             |
| f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code                                                                                                |             |
| g) To facilitate the efficient and transparent administration and implementation of this Code.                                                                                                        |             |
| (h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.                                                                                    |             |

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### SECMP0004 Modification Report Consultation Responses

## Large Supplier Modification Report Consultation Responses

| SEC Voting Group | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Utilita          | Yes      | Despite the high costs provided by the DCC for implementing the Modification, we are fully supportive of this solution with the inclusion of the Device Serial Number within the Smart Metering Inventory. We believe the Modification will lead to better data quality and ensure consistency between market participants through creating a firm and central link between MSN and GUID. We also support the Proposers view that the Modification better facilitates SEC Objective (a) with improving the ability to accurately identify a device. Although we note that some Parties have developed their own system mapping between MSN and GUID we believe a centralised solution is much more cost efficient, particularly for smaller market participants. We also believe the DCC is the best place for holding a GUID and encourage the DCC to make cost savings wherever possible to reduce the overall cost of the solution i.e. with the testing/implementation of other Modifications at the same time. |
| EON              | Yes      | We agree with the modification proposal that this change will improve the baseline SEC in accordance with SEC objectives (a) and (d), facilitating an efficient process through P302 and thereby facilitating competition.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| EDF Energy       | Yes      | Our view is that this Modification better facilitates SEC Objective (a) because it will improve the efficiency and accuracy of the Change of Supplier process (i.e. interoperability) for DCC enrolled smart meters by ensuring that the metering data is available via the DCC is aligned with the data being sent on industry dataflows. We also believe that this Modification better facilitates SEC Objective (d) for a similar reason - an effective and accurate Change of Supplier process is fundamental to a competitive energy market - this Modification will benefit the data integrity of the data communicated in the Change of Supplier process, benefiting customer billing and settlement processes. We firmly believe that the benefits of making this change outweigh the drawbacks and costs associated with implementing it. We believe that the alternatives to progressing this change are: • Do nothing -                                                                                  |

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## Large Supplier Modification Report Consultation Responses

| SEC Voting Group | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|                  |          | <p>this would mean that there would be no direct relationship between the GUID and the MSN - it would have to be assumed that the meter that is being referred to on dataflow is the same as that for which information is being received via the DCC. Where the meter remains with the installing Supplier this will not be an issue - where a meter churns and the GUID and MSN do not relate to the same device then this will negatively impact billing and settlement processes. Not only is this likely to result in errors that have a direct cost to market participants, this will result in customer complaints which not only further increase the cost but negatively impact the reputation of smart metering. We believe that these risks are sufficient to justify the cost of this Modification.</p> <ul style="list-style-type: none"> <li>• Obtain MSN from other sources - The Modification report refers to obtaining the MSN from other sources such as ECOES or DES - this has the same issue as the 'Do Nothing' option above as this would infer that the data in ECOES/DES and the communications from the DCC relate to the same device. While it is possible to obtain the MSN from another source, there is nothing that ensures that this MSN/GUID relationship is correct. This option would have the same billing and settlement risk associated with it as the Do Nothing option, and believe that this risk is sufficient to justify the cost of this Modification.</li> <li>• Amend industry dataflows to use GUID – Amending the format of the MSN within industry flows to enable the GUID to be entered into this field is not an option as the costs would far exceed those of this Modification, and would impact parties who are not involved in smart metering (such as HH Suppliers and Agents). Changing a number of the industry dataflows to contain the GUID alongside the MSN would have a significant cost that is likely to be in the region as, and probably exceed, the cost of this Modification. This option would also only provide this GUID/MSN relationship on transactional basis, and errors are likely to occur as data is transferred between parties on churn. Unlike using a single point of reference (the DCC Inventory) this option has the risk that quality of the GUID/MSN relationships would degrade over time,</li> </ul> |

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## Large Supplier Modification Report Consultation Responses

| SEC Voting Group | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|                  |          | <p>creating a similar billing and settlement risk as the previous two options. • While the Modification Report infers that this Modification mainly impacts Suppliers it is worth noting that this Modification impacts (and benefits) not only Suppliers but also Distributors. Distributors will interact with smart meters via the DCC as well as receiving industry dataflows – they will also need to understand the relationship between the GUID and the MSN and will be impacted by any data quality issues. They would also be impacted by any changes to industry dataflows that might be made as an alternative to this Modification as they are recipients of meter technical details. We would also like to challenge the costs that have been provided for this Modification, and specifically the synergies that might be realised through implementing this change in the same release as SECMP0011. The Modification Reports for these changes show that the only synergies that would be gained from implementing these changes together would be in Testing and Implementation to Live. This does not seem to be correct. These two changes are essentially the same; they are each adding a data item to the DCC Inventory and a number of associated SRs (and other functions such as reporting). our expectation is that the cost increase of adding two data items rather than one would be incremental – we would definitely would not expect the design costs to remain unchanged if the two Modifications were implemented as part of single release as you would effectively have a single design covering both Modifications. Our expectation is that our own costs to implement both of these Modifications in a single release would be a 10% increase in our costs from implementing one of the changes, and we would expect the DCC costs to be in the same region. Instead this is showing that implementing both changes would only reduce the overall cost by less than 10%. We really don't understand how this can be the case. The cost information is obviously critical when considering these changes as in both cases the challenge that has been made is whether the benefits of making the changes outweigh the costs, even if people feel that the SEC</p> |

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|-----------------------------------------------------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SEC Voting Group                                          | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|                                                           | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                           |          | objectives are better facilitated by the changes. This bar becomes a lot harder to reach when the costs we are being provided are not only very high, but do not seem to be realistic. While we recognise that each Modification needs to stand on its own, the actual overall cost of implementing these changes as a release will be a consideration for Parties when deciding whether to approve or reject these changes – our concern is that these changes might be rejected, either by the Change Board or by BEIS in the role of the Authority, on the basis of inaccurate information.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| British Gas                                               | Yes      | We agree with the Proposer, that General SEC Objective (a) and (d) will be better facilitated by the approval of this modification, to ensure increased data integrity across the industry and specifically during Change of Supplier. However, we would like to clarify the process described in H3.29 to H3.31. We do not believe the current legal drafting allows for the DCC to provide necessary flexibility to account for Supplier processes and any churn that may arise due to change of suppliers. We do not believe the DCC should rigidly state the time we are permitted to send the Service Request, the principle of normal business / system hours should be applicable. "H3.30 (c) The time during which the User shall send the Service Requests - the time is to be determined by the DCC" Also the start date should not be a prescriptive start date for Users (i.e. there should be enough flexibility between the start date and end date to allow users to submit on chosen days (rather than having to submit max limit each day for the entire period). In addition; within the calculations used in H3.31 the maximum limit definition should be a maximum number (the text suggests it is fixed number). This change will help facilitate the BSC P302 change proposal ( <a href="https://www.elxon.co.uk/mod-proposal/p302/">https://www.elxon.co.uk/mod-proposal/p302/</a> ) as the process relies on the gaining supplier having the MSN. This will undoubtedly be resolved by the faster switching programme / centralised registration changes, but the date for delivery of that is uncertain. The implementation cost of this mod is high (for a single data item to be |

| Large Supplier Modification Report Consultation Responses |          |                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SEC Voting Group                                          | Response |                                                                                                                                                                                                                                                                                   |
|                                                           | Approve? | Rationale                                                                                                                                                                                                                                                                         |
|                                                           |          | added) and it is difficult to assess the benefits it will deliver (although not until late 2018 based on current release schedule) versus the cost of waiting for centralised registration.                                                                                       |
| First Utility                                             | Yes      | We somewhat reluctantly approve this modification; the benefits are significant, unfortunately so are the costs that we believe to be excessive and unjustifiable, the benefits marginally out-weigh the costs however.                                                           |
| ScottishPower Energy Retail Ltd.                          | Yes      | We believe the proposal better facilitates General SEC Objective (a) and SEC General SEC Objective (d). We are concerned at the high central costs to implement this change. Nonetheless, we are broadly satisfied with the Working Group's assessment of the costs and benefits. |

## 2. Views of Small Suppliers

No Small Suppliers responded to the Modification Report Consultation.

### 3. Views of Networks

| Summary of <b>Networks</b> views against the SEC Objectives                                                                                                                                           |                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| General SEC Objective                                                                                                                                                                                 | Proposed               |
| a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.                     | ✓ 1 Party<br>✗ 1 Party |
| b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.                             |                        |
| c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.                        |                        |
| d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.                                                                  |                        |
| e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy. |                        |
| f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code                                                                                                |                        |
| g) To facilitate the efficient and transparent administration and implementation of this Code.                                                                                                        |                        |
| (h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.                                                                                    |                        |

## Networks Modification Report Consultation Responses

| SEC Voting Group                           | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Western Power Distribution                 | Yes      | We approve of this modification and agree with the Working group's views that General SEC Objective (a) is better facilitated by this proposed modification because the inclusion of the Device Serial Number in the Smart Metering Inventory would provide additional confirmation when mapping MPAN information held in other industry systems used by Suppliers and other industry parties which will therefore be more efficient.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Scottish and Southern Electricity Networks | Abstain  | With the information provided in the change report we are not able to determine if this modification meets the SEC objectives. In particular we are concerned by the quoted DCC cost for providing this change.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Electricity North West                     | Reject   | <p>This is a sensible modification proposal and in principal we are supportive of the change. We agree with the Working Group's views against the SEC objectives outlined in section 6.1 of the original Consultation document. We believe having a link between the DCC Device ID and the Meter Serial number will help ensure consistency and data quality with existing industry (DTN) processes; and having the meter serial number in the DCC inventory will aid identification of the correct device and premise when dealing with any Supplier/DCC queries.</p> <p>However, on the basis of implementation costs, which we believe are inappropriately large for the change required, we are voting to reject this proposal as this does represent value for money for GB customers.</p> <p>We believe that the costs associated with implementation outweigh the benefits of the change. We are of the opinion that this is not a complex change, at the simplest level this is introducing a new</p> |

| Networks Modification Report Consultation Responses |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SEC Voting Group                                    | Response |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                     | Approve? | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                     |          | <p>data item into the DCC inventory (which the DCC will neither own nor need to validate), and whilst we appreciate that the change affects a number of interfaces for the DCC, those same interfaces are all XML based which inherently allows for a large degree of flexibility and change. We are of the understanding that the change does not introduce complexity or new business rules and it does not impact the framework of any existing DCC services.</p> <p>The high implementation cost has previously been challenged by us and other parties and whilst we appreciate that the DCC has referenced potential synergy savings by combining testing with other changes, the costs remain disproportionately high.</p> |

## 4. Views of Other SEC Parties

| Summary of Other SEC Parties views against the SEC Objectives                                                                                                                                         |           |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|
| General SEC Objective                                                                                                                                                                                 | Proposed  |
| a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.                     | ✓ 1 Party |
| b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.                             |           |
| c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.                        |           |
| d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.                                                                  | ✓ 1 Party |
| e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy. |           |
| f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code                                                                                                |           |
| g) To facilitate the efficient and transparent administration and implementation of this Code.                                                                                                        |           |
| (h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.                                                                                    |           |

| Other SEC Parties Modification Report Consultation Responses |          |                                                                                                                                             |
|--------------------------------------------------------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------|
| SEC Voting Group Name and represented SEC Parties            | Response |                                                                                                                                             |
|                                                              | Approve? | Rationale                                                                                                                                   |
| TMA                                                          | Yes      |                                                                                                                                             |
| National Grid Distribution                                   | Yes      |                                                                                                                                             |
| Chameleon                                                    | Yes      | Based on the Working Group unanimous view that this should be approved on the basis that it would better facilitate SEC Objectives a and d. |