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MP270 ‘Enabling DCC to provide SMDA Test House services’

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP270. It believed the modification better facilitated SEC Objective (d)¹, in line with the Modification Report.

Modification Report Consultation

SECAS received four responses to the Modification Report Consultation. Two respondents believed that the modification should be approved, whilst two believed the modification should be rejected. The respondents who believed the modification should be approved did not provide any views on which SEC objective this modification would better facilitate. The Proposer believes this better facilitates SEC Objective (d).

¹ facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy

Modification Report Consultation responses

Summary of responses

Four responses were received as part of this Modification Report Consultation. Two responses were in favour of the modification being approved. One favourable respondent (Large Supplier) highlighted that the legal text changes proposed would better facilitate the DCC's ability to carry out Smart Metering Device Assurance (SMDA) Testing, if the Service contract is awarded to the organisation.

One respondent (Other SEC Party) highlighted that the legal text, in its current form was not robust enough and raised a number of concerns. One such concern relates to the testing of Communications Hubs, which would be a conflict of interest, should the DCC be awarded the contract. This concern was highlighted by the DCC when the modification was raised, and the organisation was transparent about this in its own tender response. How the DCC will mitigate against this possible conflict of interest has been described in the tender, and the Smart Metering Device Assurance Sub-Committee (SMDASC) will have a clear view of how the company will remain independent.

Another concern raised related to the policy that the DCC will draft as part of its SMDA Testing Service. It is worth noting that this policy would be drafted in liaison with the SMDASC and will be subject to the Sub-Committee's approval. The scope of SMDA Testing will also be defined as per the SMDA.

A final concern was raised by this respondent around terminology – Testing Participants are mentioned within the SEC at various points, and there is a concern that it would add unintentional requirements on SMDA Testing Participants. The legal text drafting was discussed with the SMDASC Chair, and the redlined proposed changes specifically mention 'Testing Participants in respect of SMDA DCC Testing' and therefore do not apply to Testing Participants outside of SMDA DCC Testing.

A further comment was made by a respondent (Large Supplier), expressing that SMDA Testing should be non-biased, and testers should have distance and independence from the Devices that they are assessing. The independent aspect of DCC SMDA Testing has been detailed in the DCC's tender response for the SMDASC to review.

Change Board vote

Change Board vote

The Change Board voted to **approve** MP270 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	5	1	1	Approve
Small Suppliers	3	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	0	1	1	Reject

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Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

A Large Supplier representative as well as an Other SEC Party representative abstained from the vote, as they currently form part of the SMDA Sub-Committee and would like to maintain objectivity.

Views against the General SEC Objectives

Objective (d)²

The Modification Report Consultation respondents did not provide reasoning as to which SEC Objectives this modification would better facilitate.

The majority of the Change Board believed that MP270 will better facilitate SEC Objective (d) in line with the reasons outlined in the Modification Report.

Change Board discussions

A Network Party representative asked if this would mean that the DCC will take on a level of responsibility for the testing of Smart Meters. SECAS advised they will only have responsibility if they are awarded the SMDA contract. The Change Board Chair added that the DCC will have to bid alongside other interested parties. They noted that the DCC have testing facilities and therefore have the right to bid but highlighted that the SMDA will consider all interested parties equally. The Proposer (BB) advised that MP270 is a follow on from [MP264 'Updating Independence of SMDA Testing Provisions'](#), and that MP270 is to ensure that the DCC continue to be compliant with their licence. The Chair agreed, and advised MP264 was raised to allow Service Providers and any other SEC Parties to bid for the contract, as it was previously only open to parties who were independent of the SEC.

A Large Supplier representative asked if MP270 needs to be approved and implemented before the DCC bid for the SMDA contract. The Proposer advised this would be needed, as once the SMDA make their decision the new contract will be signed in November 2024. They stated that if the DCC are successful in their bid, these changes would need to be in place before they could sign the contract, which is why MP270 is to be implemented as part of the November 2024 SEC Release. They advised that this will still be useful even if the DCC are unsuccessful in their bid, as it will come into use if the DCC are awarded the contract in the future.

² facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy