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MP184 ‘Increase Smart capability of SMETS2 Twin Element ESME to support solar and storage use cases’

Annex C

Request for information responses

About this document

This document contains the full non-confidential collated responses received to the MP184 Request For Information.

Question 1: Do you believe there is an industry benefit for this Modification Proposal to be developed further?

Question 1			
Respondent	Category	Response	Rationale
Aclara	Other SEC Party	Yes	Twin element meters are currently under-utilised by the UK Energy Suppliers, despite them being commercially available since 2021. Maximising the benefits of the twin element meter by considering export applications on the secondary element can only be beneficial to support smart type applications such as microgeneration, battery charging, EV etc. This not only provides more accurate billing but also enables the consumer to be reimbursed for microgeneration applications more concisely.
Chameleon Technology	Other SEC Party	Yes	These additions enhance twin element meters to support both SMIP and SSES use cases in a standardised interoperable manner.
BEAMA Response 1	Other SEC Party	Yes	Will help in the ever-increasing demand for bi-directional energy and local generation
BEAMA Response 2	Other SEC Party	Yes	XXXX is supportive of this going forward as it is needed to meet various use case which would support a NetZero journey.
BEAMA Response 3	Other SEC Party	Yes	Maximising the benefits of the twin element meter by considering export applications on the secondary element can only be beneficial to support smart type applications such as microgeneration, battery charging, EV etc. This not only provides more accurate billing but also enables the consumer to be reimbursed for microgeneration applications more concisely.
EDF	Large Supplier	Yes	This seems like a broadly sensible change as it would enable any energy exported through the second element to be recorded, which is necessary for that energy to qualify for the SEG (and for it to be included in settlement). The alternative would be to install a separate smart meter just to record that export, which

Question 1			
Respondent	Category	Response	Rationale
			is not just expensive but technically challenging where a smart meter is used for export only, and therefore has no import supplier (who would usually be responsible for commissioning etc.).
British Gas	Large Supplier	No	

Question 2: Would your organisation incur any costs resulting from approval of this modification? Please provide your rationale.

Question 2			
Respondent	Category	Response	Rationale
Aclara	Other SEC Party	Yes	This response is confidential
Chameleon Technology	Other SEC Party	Yes	Costs may occur to develop and enhance products to take advantage of the new information made available over the HAN.
BEAMA Response 1	Other SEC Party	Yes	XXXX have no plans to develop a twin element meter at this time
BEAMA Response 2	Other SEC Party	Yes	I would estimate circa £250,000 to cover development, testing and certifications.
BEAMA Response 3	Other SEC Party	Yes	To support MP184, we would need to enhance the firmware to support the additional data items that are related to export data capture on the secondary element.
EDF	Large Supplier	Yes	The approval of this modification alone will not lead to any internal costs to EDF. If we wanted to utilise this functionality, there may be additional changes required to core systems that would require an additional cost benefit analysis to support.
British Gas	Large Supplier	No	

Question 3: Please provide any further comments you may have.

Question 3			
Respondent	Category	Comments	SECAS Response
Chameleon Technology	Other SEC Party	As per business requirement 5 all information listed in the modification must be made available over the ZigBee HAN. These additional items would be included in the GBCS 7.4 tables - An active Export Register on the Secondary Element - Four Time of Use (TOU) tariffs for Active Export on the secondary element - Profile Data Log for the Active Export Register on the secondary element. For some reason the following item is missing from the version 0.6 Business Requirements, it should also be included as a HAN data item: - Reading of an Export MPAN on the ESME Device for the secondary element	SECAS acknowledges that Reading of an Export MPAN on the ESME Device for the secondary element should have been included in Requirement 5 and has been amended in the Business Requirements.
BEAMA Response 2		I would recommend that this is made an optional feature / new variant with SMETS2 that will allow manufacturers to implement as per their own market drivers, rather than mandating it.	
EDF	Large Supplier	Given the SEG and the likely increase in export tariffs it seems sensible for smart meters to be able to store and use ToU data for export (in the same way that they do for import) and to show people how much they will get paid for the energy they are exporting – it just seems odd that the only place that this would be done would be on the second element of a twin element meter, which is likely to be an edge case. Unless there are any plans to look at ToU tariffs for export and how they work on smart meters more holistically, we would suggest that the requirement to include an Export Tariff TOU Price Matrix should probably be removed from this particular modification as it is likely to	The DCC are unable to verify the associated costs of including an Export Tariff TOU Price Matrix at this time.

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Question 3			
Respondent	Category	Comments	SECAS Response
		increase the cost and complexity of the changes required with no clear benefit, unless similar export ToU requirements are also going to be included for other meter variants as well.	
British Gas	Large Supplier	We note that the proposed solution only allows for four time of use tariffs for Active Export on the secondary element. Is this still appropriate, as we approach the introduction of MHHS? If there are use cases or customer propositions that would utilise this modification, why are they being restricted to just those needing four tariffs, not full HH availability?	SMETS Section 5.13.1.1 defines the “Secondary Tariff TOU Price Matrix [INFO]” as: “A 1 x 4 matrix containing Prices for Time-of-use Pricing Tariffs relating to Supply via the secondary measuring element of the Electricity Meter.” There is currently nothing defined in SMETS for the secondary Element relating to Export, MP184 mirrored the granularity of the existing Import TOU for Export. This is what the Proposer is seeking.