# MP077 'DCC Service Flagging' Modification Report Consultation responses

## About this document

This document contains the full non-confidential collated responses received to the MP077 Modification Report Consultation.

## Summary of responses

MP077 Modification Report
Consultation responses

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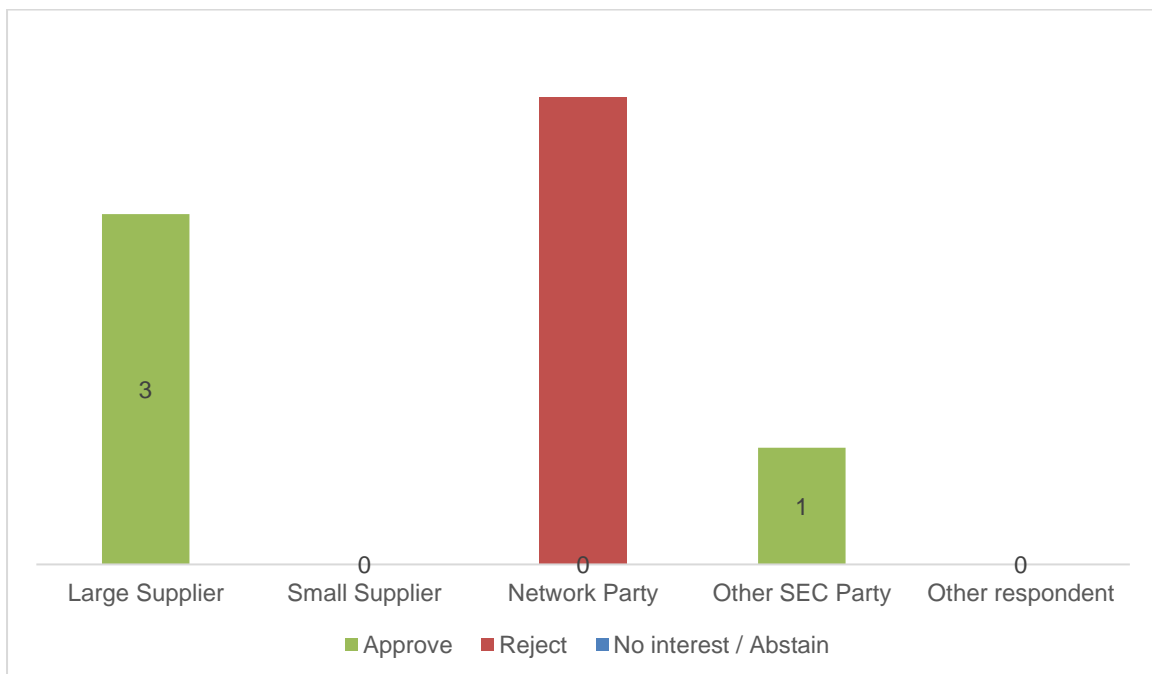
## Question 1: Do you believe that MP077 should be approved?

| Question 1 | | | |
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| **Respondent** | **Category** | **Response** | **Rationale** |
| **Western Power Distribution** | Electricity Network Party | Reject | We believe that this modification should be rejected, firstly because the implementation date is not achievable.  The DNOs had advised SECAS ahead of this Modification Report Consultation that a November 2021 implementation date would not be achievable without putting the Faster Switching Programme at risk, however this has not been addressed or even highlighted in the report.  The report suggests that as a result of all the discussions that November 2021 is achievable and this is misleading to other SEC Parties.  Ofgem had specifically stated they would support a November 2021 only if they had assurance that the Faster Switching Programme would not be put at risk.<br><br>The consequential change that is required to amend the D0350 flow, currently under the MRA, has not been raised, and therefore in accordance with the process that would normally be followed with other cross code changes, we are unable to approve without the associated changes being approved.  The change to the valid set in the DTC is required ahead of or simultaneously with SECMP077 and as it has not yet even been raised we are not able to support this modification.<br><br>Whilst we understand the intent of this modification we don't believe that in its current state that it resolves the issue and could potentially have a negative impact on SEC Objective (a) by causing additional confusion to the status of Smart Metering Systems. |

| Question 1 | | | |
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| **Respondent** | **Category** | **Response** | **Rationale** |
| **Calvin Capital Ltd.** | Other SEC Party | Approve | The modification better facilitated SEC Objective (a) due to better reliability of the information provided through service flags thus promoting a more efficient smart meter service to all suppliers and customers. |
| **OVO** | Large Supplier | Approve | SEC Objective (a) as called out in the Mod report. |
| **Electricity North West Ltd.** | Electricity Network Party | Reject | We reject the proposed implementation date of November 2021 and also query the estimated costs provided by the DCC.<br><br>We are disappointed DNOs concerns raised regarding this implementation date have not been included and addressed in the Modification report. Whilst the report states that Ofgem has agreed that a consequential change would be raised after MP077 is approved in order to carry out the changes to the REC needed to mirror the SEC changes, there is no mention of the operational risk to the delivery plan of the Switching Programme with the implementation of this modification prior to CSS go live in summer 2022. The risk being that the implementation of this modification in November 2021 would require another release of MPRS which would cut across several Switching test phases. DNO's have already made a strong recommendation that this is deferred until after Switching go-live. Energy Suppliers and Network Operators are obliged to co-operate with the delivery of this Significant Code Review under their licence which would take precedence over any SEC obligations inappropriately implemented via MCP077. We refer the DCC to the notice from Ofgem directing that no additional changes can be brought into the scope of the programme until June 2022. As the SEC modification would require a new version of MPRS the proposed implementation timescales are incompatible with the Ofgem notice. |

| Question 1 | | | |
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| **Respondent** | **Category** | **Response** | **Rationale** |
| | | | We note that the impact statement states" This information is necessary for Suppliers to establish whether there is an SMS they can communicate with at that location in order to accurately offer customers the correct tariff and service. It is also essential for Network Parties to correctly handle Alerts." There are other mechanisms for Suppliers to check if a smart meter is fitted including querying the DCC inventory through existing interfaces. The data is not essential for Network Parties to correctly handle Alerts.<br><br>Whilst the modification itself makes sense we would challenge the efficiencies of the DCC proposed costs. As we understand it the modification isn't introducing a new interface it is just changing the values that are populated in the interface based upon the DCC inventory status. We note in the breakdown of costs £132,000 is cited for the DSP build effort alone which we believe is over stated for a change of this type. We recommend the DCC undertake industry benchmarking of the costs overseen by SECAS. This is in keeping with Ofgems view in their recent DCC price control review consultation whereby Ofgem noted that the DCC continues to use the maximum market rate as the benchmark for contractor daily rates. Also we note the recent SEC Panel Budget consultation stated that BEIS and Ofgem are seeking oversight and assurance from the SEC Panel in relation to the DCC delivery of services. |
| **Utilita** | Large Supplier | Approve | The proposed DCC service flag status changes better align with what is written in the SEC.<br><br>These new definitions should lead to clear and more accurate information shared across industry. Therefore, we believe this modification better facilitates SEC Objective (a) allowing for a smoother operation of the Smart Metering Systems. |
| **EDF** | Large Supplier | Approve | We believe that MP077 will better facilitate General SEC Objective (a) by ensuring that suppliers are able to understand whether a consumer they are looking to acquire has an |

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| Question 1 | | | |
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| **Respondent** | **Category** | **Response** | **Rationale** |
| | | | active DCC enrolled smart meter as part of the sales/acquisition process, and therefore ensure they offer that consumer appropriate products and tariffs as a result. Making the DCC Service Flag more accurate will also make it more likely that a gaining supplier will be able to operate a smart meter that they gain as the result of a change of supplier, as they will have visibility of the capability at an early stage in the switching process. |
| **SSEN** | Electricity Network Party | Reject | Due to the faster switching programme, an implementation date of November 2021 does not allow time for the necessary changes required to be implemented without putting the switching programme at risk. This was highlighted through working groups; however, this has not been reflected within this consultation.<br><br>Looking into the costs of this modification, detailing the deletion of 2 flags and creation of 2 new flags, we would challenge the implementation cost of approximately £387,000.<br><br>Due to these points, whilst we understand and support the intent of this modification, we don't believe that in its current state it should be approved and would better facilitate General SEC Objective (a) by Facilitating the efficient operation and interoperability of smart metering systems at energy consumers' premises. |
| **UK Power Networks** | Electricity Network Party | Reject | The implementation date is not feasible for UK Power Networks.<br><br>The proposed implementation date of this modification presents a material risk to UK Power Networks' ability to meet the Switching Programme Stage of Transition Testing Stage 1 milestone. UK Power Networks have a number of preparatory activities to complete during September and October 2021 in order to meet the deadlines in the Switching Programme Plan. |

## Question 2: What impact will MP077 have on you as a SEC Party if approved?

| Question 2 | | | |
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| **Respondent** | **Category** | **Response** | **Rationale** |
| **Western Power Distribution** | Electricity Network Party | | Although there wouldn't be a direct impact to us as a result of SECMP077 being implemented, as an RDP we would need to make the consequential changes to MPRS. Due to the work involved under the Faster Switching Programme we are not in a position to do this in time for the proposed implementation date of November 2021. We feel that this change should be paused until after Faster Switching has gone live, currently targeted for mid 2022. |
| **Calvin Capital Ltd.** | Other SEC Party | Approve | The information will allow us to better manage the smart meters we own, understanding when SMETS1 meters migrate to the DCC and when SMETS2 meters are installed but not commissioned and require further action to complete commissioning. |
| **OVO** | Large Supplier | Approve | Unsure of the Response options provided. There will be an impact to Users as it is changing the way DCC processes Service Requests. It will also allow for the DCC Service Flag to updated in the Registration Data systems which is causing serious issues in identifying when a meter is held as being DCC Serviced when it is not. |
| **Electricity North West Ltd.** | Electricity Network Party | Reject | As per our rationale in response Question 2. |
| **Utilita** | Large Supplier | | |
| **EDF** | Large Supplier | | MP077 will enable us to more accurately identify whether a potential new customer has an DCC enrolled smart meter as part of the acquisition process, by improving the data made available in the data enquiry services (DES/ECOES) as well as the information received from the registration services (CDSP/MPAS) as part of the switching process. This will |

| Question 2 | | | |
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| | | | enable us to ensure that we offer the customer products that are appropriate for their metering and take them through an appropriate customer journey. We will need to make minor changes to our interfaces with the data enquiry and registration services as a result of MP077, these changes will be minor. |
| **SSEN** | Electricity Network Party | | We would require amendments to be made to internal systems based on these changes as we use the Smart Flags to correctly send requests, receive responses and handle device alerts to smart meters. |
| **UK Power Networks** | Electricity Network Party | Reject | UK Power Networks will not be able to deliver the required changes to the MPRS application and the onward DCC adaptor without impacting upon the parties' abilities to meet the Switching Programme milestones. This change will require system development to the MPRS application in addition to changes to our DCC Adaptor, which consumes a number of data items from the D0350 data flow and uses it to confirm that an N16 has been received. UK Power Networks is aware of the issues relating to the current DCC Service flag values which are not in use and can appreciate the merit for this change. UK Power Networks would like to propose a revised implementation in early 2022. |

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

| Question 3 | | |
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| **Respondent** | **Category** | **Comments** |
| **Western Power Distribution** | Electricity Network Party | In addition to the comments under the previous questions, we also wish to raise the following points:<br><br>1) The PIA stated costs of £50k for the solution of A, N and I and costs of £275k for the solution of A,N,I and S.  The FIA only looks at the first solution due to the costs, however the implementation cost of only having A, N and I flags is now showing at £380k.  We seek clarification as to why the significant increase.<br><br>2) We don't believe that there is a clear business case showing the benefits outweigh these costs.<br><br>3) In the legal text, we don't feel that the description for the service flags is accurate.  Under 'Active' and 'InstalledNotCommissioned' it refers to 'SMS, however the D0350 relates specifically to a Metering Point and not an SMS.  Under 'Non-Active' it states 'it' but doesn't clarify what 'it' is.<br><br>4) One of the requirements from the working group was for there to be detail added to specify exactly what triggers each flag and we don't feel that this has been addressed.  Is it only when a change in status is triggered by an SRV sent by a User?  What if there are data fixes required?  Will updating the inventory trigger the flags?<br><br>5) Although we understand that 'S' was being removed due to the costs, based on our first point above we question why this cannot be included.  A suspended device cannot provide Smart Services to a consumer in the way an active device can and therefore in order to address the intent of the modification we believe that the suspended flag should be included.<br><br>6) We also questioned previously the removal of the withdrawn flag and status, as although the option for opting out for non-domestic services was removed, the flag never referred specifically to this being its sole use and we feel that consumers could opt to withdraw from having smart services and |

| Question 3 | | |
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| **Respondent** | **Category** | **Comments** |
| | | this flag would accommodate this scenario, making Users aware of a situation where there is a Smart Meter installed but where a consumer doesn't want smart services.<br><br>7) Finally, at present 'N' is an invalid flag, however the DCC use it internally. Can we have confirmation that the DCC will only be using the new valid flags internally going forward? |
| **Calvin Capital Ltd.** | Other SEC Party | |
| **OVO** | Large Supplier | The external changes under the MRA and UNC should be explicitly linked to this Mod in any Cross Code works undertaken. This does not seem to be happening or visible. |
| **Electricity North West Ltd.** | Electricity Network Party | no |
| **Utilita** | Large Supplier | It's important to always seek ways to interact with different codes at an earlier stage where these codes interlink. Collaboration between other codes helps to create a rounded overview of each change. We believe this modification would have benefited from further input with SPAA and the MRA at an earlier stage. |
| **EDF** | Large Supplier | |
| **SSEN** | Electricity Network Party | |
| **UK Power Networks** | Electricity Network Party | No further comments |