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MP085B ‘Synchronisation of Smart Meter voltage measurement periods (meters currently installed)’ Refinement Consultation responses (CLEAR)

About this document

This document contains the full non-confidential responses received to the MP085B Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	Solution 4.	
BUUK	Network Party	Yes	While the bulk of the detail included in this modification is specific to meter manufacturers and so we are limited to the extent we can comment effectively, we do recognise the intent of the change and believe that it would be beneficial.	
Calisen Asset Management Ltd	Other SEC Party	No	Adding MVP dates to the TSAT table does not guarantee the complete implementation of a solution to fix the issue, because the solution will have to be completed via a firmware upgrade and there are a huge number of meters which do not communicate and therefore cannot be upgraded. It is unclear what the expectation would be for these meters – it should not be that they have to be removed once the MVP date passes as this would present huge costs to the industry and consumer if the meters have to be replaced. Any potential risk created around the need for meters to be removed prematurely creates a concern for Meter Asset Providers (MAPs) as investments are made on the basis of meters being installed for a set	If Devices cannot be upgraded via to ESMETS v5.2 via an OTA firmware upgrade they would need to be removed to ensure compliance with the TSAT.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			period of time and impacts to this potentially change the appetite of investors on future investments to smart metering. See also comments in Question 11 response re the introduction of MVP dates. It is unclear from the MOD report the actual extent of the issues the lack of having this consistent approach causes the DNOs – given smart meters have been installed and operating for a long time, the DNOs must have processes in place to manage this issue, so is this change a ‘nice to have’ for them as opposed to critical for their businesses.	
EON	Large Supplier	Yes	Whilst it will effectively resolve the identified issue, it may lead to industry costs for Suppliers (which are then passed on to energy consumers). We believe that as beneficiaries, the DNO’s should be fully justifying the tangible benefits realised on behalf of energy consumers, and the timescales when these will materialise.	
Landis and Gyr	Other SEC Party	Yes	Making alignment of voltage measurement periods mandatory in all deployed ESME would provide DNOs with the opportunity to accurately monitor grid voltage and take appropriate action in the face of mass Low Carbon technology adoption.	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We agree that the solution will effectively resolve the identified issue. The proposal to end-date pre ESMETS v5.2 versions' Maintenance Validity Period to November 2028 will mean that after that date all ESMES will record average rms voltage readings that are aligned to the hour and half hour. This will enable NGED to have the necessary data to help them comply with the terms of their distribution licences i.e. to develop economic, efficient and co-ordinated distribution systems.	
Northern Powergrid	Network Party	Yes	The proposal to end-date pre ESMETS v5.2 versions' Maintenance Validity Period to November 2028 will mean that after that date all ESMES will record average rms voltage readings that are aligned to the hour and half hour. This will enable Northern Powergrid to have the necessary data to help them comply with the terms of their distribution licences i.e. to develop economic, efficient and co-ordinated distribution systems.	
Northern Powergrid Metering Limited	Other SEC Party	No	Whilst Northern Powergrid Metering Limited (NPML) believes this solution will resolve the identified situation, NPML does not consider this solution to be effective. There are significant impacts that need to be addressed and the intent of the modification does not match the legal changes proposed.	SMETS1 ESME are outside the scope of both MP085A and MP085B. All of the legal text changes for this modification relate to the TSAT table "SMETS2+ Devices: ESMETS and Relevant Versions of GBCS", meaning SMETS1 are not in scope.

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			ESMETS as defined in the SEC does not specify whether a meter is a SMETS1 or SMETS2 meter, and this modification report suggests all versions of ESMETS prior to ESMETS version 5.2 would be ended, whilst the legal drafting only addresses SMETS2 devices. Not all assets are displaying the issue that this modification seeks to address, and using the MVP would mean that meters that are compliant to the requirements but have not received an update would also fall into the pot of meters that are to fall outside of a valid MVP.	
OVO	Large Supplier	No	We understand what the solution is trying to achieve, however, have concerns around the end dating of the pre-ESMETS v5.2 within the TSAT. There are a couple of reasons for this... Once the end date expires Suppliers must have updated the Firmware to v5.2 or later. This has already been noted, but Suppliers must purchase the firmware at a cost, but this firmware upgrade would only benefit Network Parties so why should this be funded via Suppliers? There is a risk that the firmware won't be updated by that time and therefore will result in devices being scrapped. We queried at the working group why the functionality was not codified in the original Technical Specifications to	SECAS acknowledges that the v5.2 firmware used in the proposed solution is not yet available. The Proposer has selected the end date for the Maintenance Validity Period as 2 November 2028 as they believe this will allow enough time for Manufacturers to develop the firmware and Suppliers to roll it out on their Devices.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			be advised that this was likely due to an oversight. We don't necessary feel that we should foot the bill for an oversight that won't actually benefit us. We don't have contracts with all Manufacturers so we don't get all the firmware we need to keep the estate up to date, so we can't guarantee that we can update all manufacturers' meters, that we've COS gained, for example.	
Scottish and Southern Electricity Networks	Network Party	Yes	Once devices have been updated to the appropriate SMETS version, SSEN will benefit from being able to collect RMS Voltage Measurements Periods starting at consistent time periods resulting in accurate and efficient data collation. The alignment will thus allow SSEN to identify issues by comparing aligned voltage data on LV feeders and have the ability to forecast future voltage issues.	
Scottish Power Energy Networks	Network Party	Yes	The proposal to end-date pre ESMETS v5.2 versions' Maintenance Validity Period to November 2028 will mean that after that date all ESMETS will record average rms voltage readings that are aligned to the hour and half hour.	
Smart Meter Assets1 Limited	Other SEC Party	No	We are concerned about the unintended consequence for the estate of meter already installed.	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
UK Power Networks	Network Party	Yes	The proposed solution will resolve the identified issue because the average Root Mean Square (RMS) voltage readings from smart meters will measure voltage across a consistent period synchronised in time for all meters measured across a 30-minute period starting on the hour and on the half hour, which is essential for voltage monitoring. This would also align with the half hour consumption profile data. This will support Network Parties to comply with their statutory obligation to ensure the voltage supplied to consumers' premises from Low Voltage electricity networks is always between specified limits, as defined in The Electricity Safety, Quality and Continuity Regulations 2002.	

Question 2: Do you agree that the proposed end date of pre-ESMETS v5.2 versions of 2 November 2028 provides enough time to allow relevant Parties to make the necessary preparations to update pre-ESMETS v5.2 ESME Devices to ESMETS v5.2 or later?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	However, we assume that the firmware upgrades will be available within a reasonable time frame, in order to achieve this. As Suppliers we can't update firmware until firmware updates are available from the manufacturers.	
BUUK	Network Party	-	Not something we are adequately informed enough to comment on.	
Calisen Asset Management Ltd	Other SEC Party	Yes	If you can get manufacturers to agree to include in future firmware. However, there is still the issue of non-communicating meters. It is unclear what would happen for meters removed and triaged, and then reinstalled, which may be an earlier SMETS version – if the MVP date had passed, would they be able to still be re-installed and then upgraded? This would need to be clarified as it could have a significant impact in future triage volumes.	If a meter is removed, triaged and re-installed at a premises where there is an existing Smart Metering System, then the "Standard Conditions of Electricity Supply Licence" Section 39.15 requires that the exchanged meter is within the Maintenance Validity Period. If the meter is installed at a premises where there is no Smart Metering System or a meter is exchanged then the ESME must be within its Installation Validity Period.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
				In general, the Installation Validity Period ends much earlier than the Maintenance Validity Period. If a removed meter is triaged and is outside of the Maintenance Validity Period then it is very likely to be outside of the Installation Validity Period. A removed meter would be could need to be upgraded at a triage facility to an ESMETS version which is within the Installation Validity Period and Maintenance Validity Period.
EON	Large Supplier	Potentially yes but with reservations	As of February 2024, ESMETS v5.2 compliant firmware versions are not yet readily available, even in TEST format, let alone production format. There is therefore an inherent risk in specifying a deadline when the solution is not currently available.	
Landis and Gyr	Other SEC Party	Yes	It's likely that 4 years will be enough time.	
National Grid Electricity Distribution	Network Party	Yes	We agree with the proposed end date of 2 November 2028, NGED have listened to concerns expressed from all involved parties and although we would have preferred an end date before 2 November 2028, understand that it will take time to develop and implement the firmware upgrades required for some ESMEs to implement the functionality set out in MP085A.	

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Northern Powergrid	Network Party	Yes	Ideally the end date would be before 2 November 2028, but as part of the development of this modification proposal Northern Powergrid has listened to the concerns expressed by manufacturers, BEAMA and suppliers and recognise that it will take time to develop and implement the firmware upgrades required for some ESMETs to implement the functionality set out in MP085A. Hence, Northern Powergrid agree with the proposed end-date of 2 November 2028.	
Northern Powergrid Metering Limited	Other SEC Party	No	No asset on the CPL has yet had a firmware release updating to ESMETs v5.2 and firmware roadmaps are still being adjusted to incorporate a change to the specification that was released in late 2022. It may be that the deadline provides more than enough time to transition to ESMETs v5.2, however it is too soon to tell. There are only three entries on the CPL with version 5.0 of ESMETs certification, and that version of SMETs has been present for three years. It is not unreasonable to assume that whilst firmware may be developed in time, there may not be adequate time to test and deploy the firmware prior to the deadline. NPML assets on average have been mainly on the N-1 firmware, to ensure that any issues identified when meters are updated in the live environment can be remedied prior to mass deployment. In recent times there	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			has been multiple firmware upgrades that have needed to be halted due to issues identified during deployment. Introducing an MVP end date too soon will force suppliers to take avoidable risks with NPML assets to remain compliant to this change.	
OVO	Large Supplier	Unable to say	Whether this can be delivered on time is a huge ask, and a lot will rely on the Manufacturers. This puts a lot of onus on Suppliers and there is every possibility that this will leave us as Suppliers rushing at the end to get the meters over the line. We also question what will happen to the ones that we are unable to upgrade? Who will pay for their scrappage? When that date comes, does any firmware pre 5.2 fall off the CPL and become suspended? We also don't yet know when we are getting the first 5.2 compliant firmware which will have to go through subsequent testing, pilot, etc. Without these dates we are unable to advise of our turn around times. Having said that, November 2028 does give us over four years to get compliant, but we're all dependent on what the Manufacturers give us and when. Theoretically it gives enough time for the Manufacturers to comply, but we are not accountable for them so can't give any guarantees.	Devices which could not be upgraded would be non-compliant and would need to be removed. Any firmware which is pre-ESMETS v5.2 must be marked as 'Removed' on the CPL. SMETS1 Devices are not governed by the GBCS and therefore the proposed solution to MP085B does not apply to them.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			We also question what will happen to SMETS1 E&A devices, as we don't believe that they will be able to accommodate 5.2, so what happens to those?	
Scottish and Southern Electricity Networks	Network Party	Yes	As noted on the Modification Report, the proposed date of 2 November 2028 will potentially delay benefits and require manual intervention when utilising voltage data. Although this date has been selected to allow manufacturers enough time to achieve this, we understand that some manufacturers will implement these changes before this date. Due to this we assume that we will be able to observe the implemented solution across a number of manufacturers before 2 November 2028.	
Scottish Power Energy Networks	Network Party	Yes	Scottish Power Energy Networks agree with the proposed end-date of 2 November 2028. While an earlier date would be preferable, it is recognised that time will be required to implement the upgrade to devices, there is a desire to have voltage readings collected in a consistent manner as soon as practicable.	
Smart Meter Assets1 Limited	Other SEC Party	No	-	
UK Power Networks	Network Party	Yes	We agree with the proposal to apply an end-date to pre-ESMETS v5.2 versions' maintenance validity period (MVP) as this will allow Suppliers to continue installing	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			pre-ESMETS v5.2 ESME devices, where this will require updating to v5.2 or later, once the respective ESMETS version's MVP reach their maintenance end date. This proposal will allow for pre-ESMETS v5.2 Devices still in supply chains to be installed and upgraded, reducing return and scrappage costs, as well as environmental impacts.	

Question 3: Do you agree that the legal text will deliver MP085B?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	-	
BUUK	Network Party	Yes	Subject to confirmation from meter manufacturers that this is achievable.	
Calisen Asset Management Ltd	Other SEC Party	Yes	But we do not agree that setting a date would fully implement the change.	
EON	Large Supplier	Yes	The change to the Maintenance End Dates in the SEC Schedule 11 'TS Applicability Tables' will make all installed pre-ESMETS v5.2 ESME devices invalid.	
Landis and Gyr	Other SEC Party	Yes	TSAT revisions will drive the introduction of MP085B.	
National Grid Electricity Distribution	Network Party	Yes	We agree with the proposed Legal Text, however we would have expected the Applicability Period End Dates for GBCS 1.1 through to 4.2 to similarly have been set to 2/11/28.	The Applicability Period End Date had not been populated as the modification does not seek to end date GBCS versions. End dating the Applicability Period End Date would End Date GBCS versions which are used with other technical specifications, which is not the purpose of this modification.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Northern Powergrid	Network Party	Yes	We agree that setting the Maintenance End Date to 2/11/28 in the Technical Standards Applicability Tables will deliver MP085B. However, we would have expected the Applicability Period End Dates for GBCS 1.1 through to 4.2 to similarly have been set to 2/11/28.	
Northern Powergrid Metering Limited	Other SEC Party	No	The intention of the modification is the phase out of SMETS2 electric meters prior to ESMETS v5.2. As clarified in the SECAS Guidance Notes: Technical Specifications and their interaction with the Central Product List (CPL) 'The MVP is the period during which a Device must be repaired, replaced, upgraded or modified in line with relevant Technical Specification.' If an MVP end date is in place, these requirements no longer apply. Closing the MVP removes the obligation to upgrade these meters, it does not mandate it. This would force an exchange for all meters not on SMETS2 v5.2. In areas with no WAN in order to remain compliant with this change, replacement of meters will not deliver the functionality to DNOs, the meters cannot communicate and the removed meter will not have received firmware updates to enable them to be triaged, increasing waste. Where meters have the functionality proposed in ESMETS v5.2 but have not received an update, they also	If the Device is outside of the Maintenance Validity Period, it should be upgraded or replaced by a compliant Device. The "Standard Conditions of the Electricity Supply Licence" Section 39 notes that an ESME should be "within its Maintenance Validity Period" and "satisfies the requirements of a particular version of the ESMETS technical specification. It further states that "the Licensee must ensure...the Smart Metering System is not subsequently maintained...so as to satisfy the requirements of an earlier version". This means that once a Device is on ESMETS V5.2 it cannot revert to a version earlier than ESMETS v5.2. The conditions in the aforementioned Licence mean that Parties must upgrade the Device if it is outside of the Maintenance Validity Period or replace it

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			would be at risk of being removed, purely as they do not present SMETS2 v5.2 in their inventory.	with another meter which is within the Maintenance Validity Period.
OVO	Large Supplier	Yes	-	
Scottish and Southern Electricity Networks	Network Party	Yes	The legal text has clearly stated the maintenance end date for pre 5.2 version ESMETS has been set as 2 November 2028.	
Scottish Power Energy Networks	Network Party	Yes	We agree that setting the Maintenance End Date to 02/11/28 in the Technical Standards Applicability Tables will deliver MP085B.	
Smart Meter Assets1 Limited	Other SEC Party	-	-	
UK Power Networks	Network Party	Yes	We agree with the legal text to update Schedule 11 'TS Applicability Tables' by adding a date of 2 November 2028 to ESMETS Version 5.2 because this will allow Manufacturers sufficient time to design and produce ESMETS v5.2 firmware updates and for Suppliers to roll them out across their Devices. In addition, for all future ESMETS Variants after version 5.2, a date should be determined and applied to "Maintenance End Date" and to the relevant "GBCS Applicability Period End Date" instead of remaining as "Not Determined" because this will ensure ESMEs remain fully operational with all current and future smart	Only the Maintenance Validity Period has been populated as the modification seeks to end date ESMETS versions. Providing an end date to the Applicability Period End Date would also mean Parties would be unable to use the associated GBCS version. This modification does not seek to end date any GBCS versions.

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			capabilities, whilst also minimising the number of ESMETS versions and therefore reducing complexity	

Question 4: Do you agree with the proposed implementation approach?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	We agree with Solution 4, which seems sensible.	
BUUK	Network Party	Yes	Subject to confirmation from meter manufacturers that this is achievable.	
Calisen Asset Management Ltd	Other SEC Party	No	Whilst the MOD report reflects the discussions previously held and feedback given, it seems that a lot of this was negative and the change was not agreed by the trade associations who work on behalf of the meter manufacturers – who would be impacted by the change and be subject to costs associated with making this change. It is unclear therefore why the MOD is still progressing. It's not clear how many manufacturers would need to make changes to their firmware to implement the change and therefore the potential volume of impacted meters. There is also no indication of cost versus benefit (see Question 10).	
EON	Large Supplier	No	Our reservation is that if the date is strictly enforced, Suppliers (and eventually their customers) will bear scrappage costs for meters that cannot be upgraded. E.g. visits to customer premises, premature replacement charges etc.	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Landis and Gyr	Other SEC Party	Yes	TSAT Maintenance End Dates would be the most effective mechanism to force this change.	
National Grid Electricity Distribution	Network Party	Yes	We agree with the implementation approach.	
Northern Powergrid	Network Party	Yes	Solution 4 is an evolutionary development of our proposed Solution 1, which allows suppliers to continue to install meters that do not meet the requirements of MP085A on the basis that they can be upgraded via firmware updates to have that functionality by 2 November 2028. We note that this will provide approximately four years for manufacturers to develop and test firmware updates and for suppliers to deploy that firmware. It should also allow for meters carried in stock to be deployed on site thus minimising scrappage. Northern Powergrid also recognise that there may be a small population of ESMEs that it would be impractical and/or uneconomic to upgrade to comply with ESMETS v5.2. Provided the volume of such ESMEs is low and their location on the network known, Northern Powergrid would support compliance exemptions being provided. It is not our intention to require significant volumes of ESMEs to be replaced prematurely.	SECAS notes the suggestion about compliance exemptions, however the TSAT is definitive and exemptions are not permitted.

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Northern Powergrid Metering Limited	Other SEC Party	No	The intention of this modification is to phase out older versions of SMETS2 ESMs and an installation validity period was designed to achieve just that. There are derogation clauses in place to prevent waste issues related to cliff edges, protections already in place to allow upgrades to later versions of SMETS and there are no restrictions on how a supplier maintains the device. Choosing to use the maintenance validity period would mean a degradation of smart services to some customers. These meters will need to be replaced, and the modification does not take into consideration the waste and cost of meter removals.	
OVO	Large Supplier	Yes	-	
Scottish and Southern Electricity Networks	Network Party	Yes	The proposed implementation approach allows suppliers / meter installers to continue to utilise existing stock thereby reducing scrappage costs whilst ensuring enough time for manufacturers to design and produce firmware updates for ESMETS v5.2 and for suppliers to roll this out across devices.	
Scottish Power Energy Networks	Network Party		Implementation of Solution 4 will allow suppliers to continue to install meters that do not meet the requirements of MP085A (pre-ESMETS v5.2) while minimising any necessary scrappage of devices.	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets1 Limited	Other SEC Party	No	We don't believe this should be implemented without thorough assessment of the business case considering the risk of stranding electricity meters (currently 100% of SMETS1 and SMETS2 electricity meters).	
UK Power Networks	Network Party	Yes	We agree with the proposed implementation solution under option 4 for the application of 2 November 2028 to the maintenance validity period because that provides four years for all pre-ESMETS v5.2 devices still in supply chains to be installed which reduces return and scrappage costs, as well as environmental impacts. The installed devices can then be upgraded to the newer firmware version once it becomes available providing benefit by reducing the overall number of technical specifications in service and ensuring that all devices remain fully operational with smart capabilities. We would also consider supporting compliance exemptions for those devices that are not able to technically be upgraded to ESMETS 5.2 if these volumes are low and their physical location on the network is known because it is not our intention to require a significant amount of devices to be prematurely replaced.	

Question 5: Will there be any impact on your organisation to implement MP085B?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	We assume the firmware update will be delivered as part of an ordinary firmware release. As Suppliers we can't do the testing (as we don't have access to the required Service Requests), but may be called on to support (ie applying the firmware updates for the DNOs to test).
BUUK	Network Party	Yes	Greater ability to monitor potential outages and proactively support our customers with this to minimise impact/duration.
Calisen Asset Management Ltd	Other SEC Party	Yes	There is a risk that installed meters become 'stranded' as a result of this change – where the firmware needs to be upgraded and can't be, or through the FW testing and implementation process there may be issues – all of these mean that meters could be removed prematurely which impacts Meter Asset Providers (MAPs). Premature removal of assets in volume potentially impacts the ability for MAP businesses to invest in smart metering infrastructure in the future.
EON	Large Supplier	Yes	There will be firmware testing and deployment required. However, it is reasonable to say that this will happen as BAU work to make available other features in ESMETS v5.2. There will also be meter replacement activity required for meters that cannot be upgraded.
Landis and Gyr	Other SEC Party	Yes	L_G will be impacted in having to deliver FW to the timetable determined by customers. This may or may not align to planned maintenance releases, and therefore may require a specific release with all the associated testing, CPA assessment and certification costs.
National Grid Electricity Distribution	Network Party	No	-

Question 5			
Respondent	Category	Response	Rationale
Northern Powergrid	Network Party	No	Northern Powergrid's customers will benefit from the implementation of MP085B. Our existing systems and processes will not need to be changed to utilise the higher quality data sets arising from this modification, hence no implementation costs will be incurred.
Northern Powergrid Metering Limited	Other SEC Party	Yes	All current NPML assets are not yet on ESMETS v5.2, the impact of this modification will be to disable smart functionality to NPML owned assets. Depending on firmware availability, and deployment rates, this will likely be between 5-60% of SMETS2 electricity meters. Triage functionality is still in the process of being produced, and all SMETS2 assets do not currently have a workable solution to enable redeployment. The assets that will not be upgraded to ESMETS v5.2 compliant firmware will be ones in areas of poor and no SMWAN and as such it is reasonable to expect that these meters will also not be updated to support the triage functionality if it is delivered in time. As this modification aims to implement a forced removal of meters on ESMETS versions prior to v5.2, it needs to consider the cost of removal for these devices. MAPs are directly impacted by this SEC Modification and will bear large costs for this change.
OVO	Large Supplier	Yes	This modification would require Suppliers to upgrade to a new version of firmware which would come at a huge cost in time, effort and firmware costs. A lot of the onus will be put on Suppliers when this modification does not directly benefit them.
Scottish and Southern Electricity Networks	Network Party	Yes	There will be a positive impact in that SSEN will be able to collect accurate and efficient data due to the additional functionality ability of the ESME devices.
Scottish Power Energy Networks	Network Party	No	Scottish Power Energy Networks gateway and systems will not require to be modified to collect the RMS voltage readings from devices. Current processes will remain in place. Use of current functionality to identify misaligned voltage readings will be reduced.

Question 5			
Respondent	Category	Response	Rationale
Smart Meter Assets1 Limited	Other SEC Party	No	-
UK Power Networks	Network Party	No	There will be no impact on UK Power Networks' systems from the implementation of MP085B as no changes will be required. Use of the improved data quality voltage information in our use-cases will benefit customers.

Question 6: Will your organisation incur any costs in implementing MP085B?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	Apart from potentially needing to support the testing, we expect the firmware update will just be delivered through our BAU firmware update processes.
BUUK	Network Party	No costs	
Calisen Asset Management Ltd	Other SEC Party	-	As question 5, we could potentially be impacted if the implementation of the change is not successful and meters are stranded and have to be removed.
EON	Large Supplier	-	Any installed meters where the manufacturer is unable to provide ESMETS v5.2 firmware will not be upgradable (e.g. if a manufacturer leaves the market). Where this risk materialises, the proposer (and beneficiaries) will need to explain the benefits to energy consumers, as the pre-v5.2 asset will continue to operationally function (e.g., accurately record and send consumption data). Assuming firmware does become available, actual deployment is never 100% successful due to “intermittent / unstable / lost” WAN or HAN comms or a non-upgradable meter. The result will be visits to remove ESMES that cannot be upgraded (which would be the main source of the costs of implementing MP085B). Where these visits occur after other site visit activities (e.g. replacement of CH with 4G enabled unit), this may result in considerable adverse consumer feedback. The proposer and beneficiaries must consider this factor.
Landis and Gyr	Other SEC Party	Approx. £300k	Cost for an ESME v5.2 specific release. There will be unquantifiable opportunity costs associated with diverting resource from other parts of the L+G device portfolio.

Question 6			
Respondent	Category	Response	Rationale
National Grid Electricity Distribution	Network Party	No costs	NGED's existing systems and processes will not need to be changed to utilise the higher quality data sets arising from this modification, hence no implementation costs will be incurred. The primary benefit of this modification for NGED is the availability of a consistent set of smart metering average rms voltage data that can be used alongside smart meter consumption data in our low voltage network models and also to validate data in those models. With increasing numbers of LCT technologies e.g. electric vehicles, heat pumps, PV and battery storage systems, being connected to our low voltage system, it is becoming increasingly important to have good visibility of network voltages to enable us to make the right investment decisions at the right time. To put some metrics round the potential benefits we would like to share two illustrative examples: 1 Boston Spa Energy Efficiency Trial. This innovation project is to optimise the voltage at our 33/11kV substations and hence at customers' supply terminals in the Boston Spa area of Yorkshire in order to deliver energy reduction benefits to those customers. This works by generally lowering the voltages on the distribution system and hence at the customers' supply terminals whilst ensuring that voltages remain within statutory limits at all times. Customer's voltage is controlled by tap changers on the 33/11kV transformers that are set using close-to-real-time voltage data from the smart meters in the premises of customers supplied via that transformer. The availability of reliable, accurate and synchronised voltage data is key to maximising the customer benefits. For a modest 1% reduction in voltage, the benefits to customers in the trial area are estimated to be £136k/annum increasing to £406k/annum if the voltage could be reduced by 3%. If the project was rolled out across GB, the benefits to GB consumers is estimated to be between £256m/annum and £770m/annum. 2. In 2019 Distribution Network Operators (DNOs) commissioned PA Consulting to assess the benefits to DNOs from smart meters. This report concluded that smart metering in general could be expected to deliver benefits in the region of £11m across all DNO between 2019 and 2030 associated with better informed load related investment decisions. This benefit arises from having more robust network models populated by better synchronised voltage and consumption data. If 10% of this

Question 6			
Respondent	Category	Response	Rationale
			benefit is associated with better voltage data, that would equate to a saving of £1.1m over the ten-year period. The same analysis also identified benefits of £43m associated with shifting load LCT demand. This benefit is also dependent upon having good network models populated with robust data. Assuming 10% of this benefit was attributed to better quality voltage data, this equates to a £4.3m saving over the ten-year period. These benefits would be shared with customers in accordance with the formula in our regulatory settlement with Ofgem.
Northern Powergrid	Network Party	No costs will be incurred implementing MP085B.	Northern Powergrid's existing systems and processes will not need to be changed to utilise the higher quality data sets arising from this modification, hence no implementation costs will be incurred. The primary benefit of this modification for Northern Powergrid is the availability of a consistent set of smart metering average rms voltage data that can be used alongside smart meter consumption data in our low voltage network models and also to validate data in those models. With increasing numbers of LCT technologies e.g. electric vehicles, heat pumps, PV and battery storage systems, being connected to our low voltage system, it is becoming increasingly important to have good visibility of network voltages to enable us to make the right investment decisions at the right time. To put some metrics round the potential benefits we would like to share two illustrative examples: 1. Boston Spa Energy Efficiency Trial. This innovation project is to optimise the voltage at our 33/11kV substations and hence at customers' supply terminals in the Boston Spa area of Yorkshire in order to deliver energy reduction benefits to those customers. This works by generally lowering the voltages on the distribution system and hence at the customers' supply terminals whilst ensuring that voltages remain within statutory limits at all times. Customer's voltage is controlled by tap changers on the 33/11kV transformers that are set using close-to-real-time voltage data from the smart meters in the premises of customers supplied via that transformer. The availability of reliable, accurate and synchronised voltage data is key to maximising the customer benefits. For a modest 1% reduction in voltage, the benefits to customers in the trial area are estimated to be £136k/annum increasing to

Question 6			
Respondent	Category	Response	Rationale
			£406k/annum if the voltage could be reduced by 3%. If the project was rolled out across GB, the benefits to GB consumers is estimated to be between £256m/annum and £770m/annum. 2. In 2019 Distribution Network Operators (DNOs) commissioned PA Consulting to assess the benefits to DNOs from smart meters. This report concluded that smart metering in general could be expected to deliver benefits in the region of £11m across all DNOs between 2019 and 2030 associated with better informed load related investment decisions. This benefit arises from having more robust network models populated by better synchronised voltage and consumption data. If 10% of this benefit is associated with better voltage data, that would equate to a saving of £1.1m over the ten-year period. The same analysis also identified benefits of £43m associated with load shifting LCT demand. This benefit is also dependent upon having good network models populated with robust data. Assuming 10% of this benefit was attributed to better quality voltage data, this equates to a £4.3m saving over the ten-year period. These benefits would be shared with customers in accordance with the formula in our regulatory settlement with Ofgem. We recognise that this analysis was carried out 5 years ago and the landscape has changed since then. For example, there is more LV monitoring on the distribution system than in 2019, and flexibility markets have evolved such that the benefits associated with load switching may have changed, however we feel that the values quoted are illustrative of the order of magnitude of the benefits.
Northern Powergrid Metering Limited	Other SEC Party	More than £1m	The premature removal of approximately 10% of NPML assets as a fallout from this modification will see significant costs incurred in logistics and scrappage costs. There is not a current workable way to ensure that these meters are redeployed to the field, and with the current limitations on the DCC to deliver a working solution for reinstallation of triaged meters from a new supplier, it is unlikely the changes necessary to mitigate this will be implemented prior to the November 2028 date.

Question 6			
Respondent	Category	Response	Rationale
OVO	Large Supplier	Yes	As above. Costs not yet determined. See questions around scrappage and who will pay for that in previous answers.
Scottish and Southern Electricity Networks	Network Party	No costs	Due to the enhanced level of data provided by this modification solution we expect less manual intervention when utilising voltage data.
Scottish Power Energy Networks	Network Party	No	Scottish Power Energy Networks gateway and systems will not require to be modified to collect the RMS voltage readings from devices. Current processes will remain in place, therefore, no costs will be incurred in implementing MP085B. Scottish Power Energy Networks will benefit from the provision of more consistent, accurate timing of voltage readings in their network fault and incident management processes. Combining this data with voltage alerts (under/over thresholds), other asset monitoring data and OMS detail will allow increased accuracy of proactive fault detection and network incident management.
Smart Meter Assets1 Limited	Other SEC Party	-	-
UK Power Networks	Network Party	No costs will be incurred from implementing MP085B	There will be no costs incurred by UK Power Networks from the implementation of MP085B as no changes will be required. Use of the improved data quality voltage information in our use-cases will benefit customers.

Question 7: How long from the point of approval would your organisation need to implement MP085B?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	We note the proposed November 2028 date for all meters to be updated to a post- 5.2 version. However, there isn't a date by which this update will have been made available by the manufacturers.
BUUK	Network Party	N/A	-
Calisen Asset Management Ltd	Other SEC Party	-	Whilst not directly applicable to us, meter manufacturers would need sufficient time to develop, test and implement new firmware and suppliers would also need time to test firmware before they roll out to their installed portfolio.
EON	Large Supplier	3 – 6 years	It will take approximately 1-2 years to obtain proven production firmware at ESMETS v5.2 suitable for deployment to all meter cohorts. It will then take another 1-2 years for this firmware to be deployed to a high percentage of installed meters (e.g. to c.95% depending on cohort). The above assumes that infrastructure can handle the required firmware deployment volumes, especially when VMO2 commence operating on 2G only. It may then take a further 1-2 years to visit premises to exchange pre-ESMETS v5.2 meters that could not be upgraded.
Landis and Gyr	Other SEC Party	4 years – from approval to implementation to allow for Energy	This allows for the move through the various SEC changes from our current latest FW to v5.2 and maintain focus on maintenance and code improvement and features requested by our customers

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Question 7			
Respondent	Category	Response	Rationale
		Suppliers who need the FW up to 12 months ahead of the deadline for deployment	
National Grid Electricity Distribution	Network Party	No implementation time required.	
Northern Powergrid	Network Party	No implementation time required	Northern Powergrid's existing systems and processes will not need to be changed to utilise the higher quality data sets arising from this modification, hence no implementation time will be required.
Northern Powergrid Metering Limited	Other SEC Party	-	As NPML is a MAP, the lead time to implement any changes will be dependant on meter manufacturers provision of firmware and energy supplier's testing, acceptance, and deployment of firmware.
OVO	Large Supplier	-	Unknown, see previous answers
Scottish and Southern Electricity Networks	Network Party	N/A	As our systems already utilise date no changes are required.

Question 7			
Respondent	Category	Response	Rationale
Scottish Power Energy Networks	Network Party	No implementation time required.	Scottish Power Energy Networks gateway and systems will not require to be modified to collect the RMS voltage readings from devices. Current processes will remain in place. No implementation time required.
Smart Meter Assets1 Limited	Other SEC Party	-	-
UK Power Networks	Network Party	No implementation time will be required	UK Power Networks' existing smart metering system and processes will not need to be changed to utilise the higher quality data sets arising from this modification.

Question 8: Do you believe that MP085B would better facilitate the General SEC Objectives?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	General SEC Objectives (a) and (e).
BUUK	Network Party	Yes	General SEC Objective 5 - facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy; Greater visibility of voltage measurement will facilitate security and sustainability of supply by providing opportunities to minimise impact of fluctuations of voltage.
Calisen Asset Management Ltd	Other SEC Party	No	-
EON	Large Supplier	-	-
Landis and Gyr	Other SEC Party	Yes	Better facilitates SEC objectives a) and e).
National Grid Electricity Distribution	Network Party	Yes	We believe this modification will better facilitate General SEC Objectives (a) and (e).
Northern Powergrid	Network Party	Yes	As indicated in the Modification Report, Northern Powergrid believes that MP085B's implementation will better facilitate SEC Objectives a) - Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain, and e) Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

Question 8			
Respondent	Category	Response	Rationale
			Objective a) is better facilitated as the proposed solution will provide a consistent approach for all installed ESMEs in relation to Average RMS Voltage Measurement Periods. The modification will bring improvements to the operation and interoperability of smart meters while also providing DNOs with more robust data for them to better manage their networks. Objective e) is better facilitated as it will improve the recording of voltage information in such a way that it can more usefully be used in the development of novel techniques for the management of voltage on high voltage and low voltage distribution networks. The Boston Spa Energy Efficiency Trial is an example of a relevant innovation project.
Northern Powergrid Metering Limited	Other SEC Party	Yes	The intent of the modification would better facilitate the SEC objectives, however the proposed solution has too many negative impacts to be implemented without amendment.
OVO	Large Supplier	Potentially (A) at a push	
Scottish and Southern Electricity Networks	Network Party	Yes	As per modification report we believe this will better facilitate SEC objective A and E.
Scottish Power Energy Networks	Network Party	Yes	Scottish Power Energy Networks believe MP085B would better facilitate SEC Objectives: a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain. This modification will provide a more consistent approach to voltage measurement readings in line with consumption readings; and e) Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy. Provision of consistent, accurate data allows Scottish Power

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Question 8			
Respondent	Category	Response	Rationale
			Energy Networks to continue to develop processes to enhance fault and incident management functions for better management of the network overall.
Smart Meter Assets1 Limited	Other SEC Party	No	The distributed costs haven't been fully considered (i.e. the risk of stranded assets, meter manufacturer costs, and supplier costs to manage firmware upgrades).
UK Power Networks	Network Party	Yes	We believe that MP085B would better facilitate provisions of the General SEC Objectives, in particular Section C1 • Paragraph (a), the first General SEC Objective to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain, and. • Paragraph (e), the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks as will best contribute to the delivery of a secure and sustainable Supply of Energy. Implementation of MP085B will ensure Electricity Network Parties are provided with accurate data in the granularity they require to enable their networks to operate more reliably and to become more efficient as the improved quality of data is collated. Alignment of timings to the hour and half-hour of the Average RMS Voltage Measurement Periods across ESMEs will allow Electricity Network Parties to identify issues on Low Voltage feeders and forecast future voltage issues resulting in Electricity Network Parties providing a higher level of service to consumers through improved management of their networks. The aligned voltage data will become even more important with the increased uptake of Low Carbon Technologies (LCT) such as electric vehicles and heat pumps being installed at consumers' premises with consequential increased load, together with solar panels and battery storage potentially affecting the supply voltage to customers on the distribution network.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP085B is implemented?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
BUUK	Network Party	Yes	Greater opportunities for proactive responses to issues on the network will have a direct benefit to consumers.
Calisen Asset Management Ltd	Other SEC Party	Yes	See answers particularly to questions 10 and 11. There are a range of potential costs to consumers associated with the implementation of this change.
EON	Large Supplier	Yes	MP085B will allow DNOs to monitor voltages more accurately in a future world of low carbon technologies. However, energy consumers will ultimately bear the cost of any meter replacement activities.
Landis and Gyr	Other SEC Party	Yes	Consumers may be positively impacted if improved DNO voltage monitoring ensures that local grid integrity is protected where low carbon technologies are implemented , e.g. EV charging, V2G, load balancing. The change should give DNOs the information necessary to upgrade the local grid as required – although consumer benefit is delivered by DNO action, not this change itself.
National Grid Electricity Distribution	Network Party	Yes	Please see response to Question 6. It is important to note that proposed solution is to end-date all existing versions of ESMETS (pre v5.2) by November 2028. There have been numerous modifications to ESMETS since the first version of SMETS2 was implemented in 2016, and ESME's made to old versions of ESMETS are still permitted to be installed and operated; there is no obligation on manufacturers and/or suppliers to upgrade them even if this is possible. We expect that the majority of ESME's currently being installed will comply

Question 9			
Respondent	Category	Response	Rationale
			with the most recent standards, but it important to recognise that this modification, to require all ESMES to be compliant with ESMETS V5.2 by November 2028, in addition to delivering benefits associated with MP085B will also ensure that all the benefits from many other SEC modifications are also delivered. It would be helpful if SECAS could identify the earlier modifications that would benefit from end-dating together with their associated stakeholder benefits, so that these broader benefits could be better understood. We note the TABASC Chair's observation that it is desirable to have a lower number of ESMETS versions in circulation to reduce architectural and technical specification complexity. It is our view that the decision to implement MP085B should be based on not only those directly attributable to MP085B, but also those associated with end-dating i.e. ensuring that the benefits associated with other modifications and the benefits associated with having a smaller number of ESMETS versions in circulation are delivered.
Northern Powergrid	Network Party	Yes	Please see our response to Question 6, for the benefits directly associated with MP085B. It is important to note that proposed solution is to end-date all existing versions of ESMETS (pre v5.2) by November 2024. There have been numerous modifications to ESMETS since the first version of SMETS2 was implemented in 2016, and ESME's made to old versions of ESMETS are still permitted to be installed and operated; there is no obligation on manufacturers and/or suppliers to upgrade them even if this is possible. We expect that the majority of ESME's currently being installed will comply with the most recent standards, but it important to recognise that this modification, to require all ESMES to be compliant with ESMETS V5.2 by November 2028, in addition to delivering benefits associated with MP085B will also ensure that all the benefits from other SEC modifications are also delivered. It would be helpful if SECAS could identify the earlier modifications that would benefit from end-dating together with their associated stakeholder benefits, so that these broader benefits could be better understood.

Question 9			
Respondent	Category	Response	Rationale
			We note the TABASC Chair's observation that it is desirable to have a lower number of ESMETS versions in circulation to reduce architectural and technical specification complexity. It is our view that the decision to implement MP085B should be based on not only those directly attributable to MP085B, but also those associated with end-dating i.e. ensuring that the benefits associated with other modifications and the benefits associated with having a smaller number of ESMETS versions in circulation are delivered.
Northern Powergrid Metering Limited	Other SEC Party	Yes	The direct impact of this modification will be the required removal of devices where smart functionality is disabled and meters cannot be updated. This will see additional site visits to customer premises. Where meters are in poor and no-WAN areas, this will result in a non-communicating meter being required to be removed, and the subsequent meter will also be non-communicating. The indirect impact to consumers from the required removal, will be the associated costs of meters being removed prematurely being passed onto consumers via their energy bills. This modification needs to consider the stranded asset cost in it's documentation, as by design it seeks to strand all assets not a specific version of ESMETS. The changes in ESMETS v5.2 do introduce significant improvements to data capture and synchronisation, and the benefits this will bring to the electricity system will be significant. NPML agree that the need to move to ESMETS v5.2 exists and as an industry we should aim to get to this point as quickly as possible, however this modification is not introducing these changes, it is mandating the retirement of all assets without this functionality.
OVO	Large Supplier	Not immediately	If we are unable to update the firmware, there is every possibility this will leave the customer with a non-working smart meter that requires an exchange.
Scottish and Southern	Network Party	Yes	Consumers should ultimately see benefits once the Network is able to operate more reliably and efficiently due to the collation of accurate data.

Question 9			
Respondent	Category	Response	Rationale
Electricity Networks			
Scottish Power Energy Networks	Network Party	Yes	As mentioned above, more accurate use of consistent voltage readings in the detection of faults and incidents within the network ultimately leads to potential pre-emptive fault detection, lower call volumes, and a more stable network.
Smart Meter Assets1 Limited	Other SEC Party	No	-
UK Power Networks	Network Party	Yes	We believe there will be no adverse impacts to consumers from implementing MP085B, however, we do believe there will be a positive impact with benefits to consumers. MP085B will bring an improvement in the quality of voltage data that will support Network Parties to enhance their voltage management capabilities on the low voltage network to maintain quality of supply delivered to consumers. This will improve our response to voltage issues and therefore minimise any detrimental effect on consumers from the increasing uptake of LCTs moving towards the Governments' target of Net Zero.

Question 10: Noting the costs and benefits of this modification, do you believe MP085B should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	The only significant cost seems to be on the manufacturers.	
BUUK	Network Party	Yes		
Calisen Asset Management Ltd	Other SEC Party	No	The MOD does not reflect the costs of the implementation of this MOD – this needs to be provided from meter manufacturers who would need to develop firmware to address this issue, test the issue and produce firmware for suppliers. Suppliers will also need to complete testing of the new firmware version to ensure it does not impact functionality of the installed estate – this takes time and resource (at least) which has a cost. This information should then be assessed against the benefits the DNOs believe they will get from this change. It should also be noted that smart meters have been installed for a long time now and DNOs have managed thus far with workarounds and utilising the information they can obtain now – so continuing the as-is processes should be considered versus the cost of implementation.	SECAS is working with the Proposer to build the business case to determine the number of Devices impacted. Several other Parties have provided confidential responses about the cost implications of this modification which will be included in discussions at the Change Sub-Committee and Change Board. As Devices in 'Install and Leave' scenarios don't contribute to installation targets, SECAS notes that there is no upgrade obligation as it is not possible to communicate with the meter.

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
			There is also an issue with installed meters that do not communicate as these will not be able to have their firmware upgraded – what is the proposal for these? See question 11 for further points.	
EON	Large Supplier	No	The goal is laudable and will force a specification upgrade leading to a less complex SMART architecture. However, there are cost implications for Suppliers whilst not being in full control over the solution. Suppliers are dependent on manufacturers to provide the firmware and dependent on the infrastructure to deploy that firmware. The cost/benefit case is not clear. Please see alternative option in response to Question 11.	
Landis and Gyr	Other SEC Party	Yes	This has an overall positive impact on grid management and is the type of feature that the smart grid would be expected to deliver. L+G's only concern is the timescales for implementation – see response to Q2.	
National Grid Electricity Distribution	Network Party	Yes	It is difficult to respond properly to this question without a feel for the costs of implementing MP085A. We are of the view that MP085B should be approved on the basis that: •The costs would be less than the value of the benefits we have set out; •There are other, unquantified benefits associated with requiring all ESMES to meet the requirements of ESMETS v5.2 by November 2028;	

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Question 10				
Respondent	Category	Response	Rationale	SECAS Response
			•There are other, unquantified benefits associated with there being a reduced number of live ESMETS versions after November 2028; and •Ensuring that DNOs have access to robust consistent data relating to the LV distribution network is a necessary part of a transition to a smart energy system.	
Northern Powergrid	Network Party	Yes	We have provided an indication of the benefits to Northern Powergrid and our customers. There are statements in the Modification Report that the costs to industry to implement this modification would be 'high' but the Modification Report does not include any specific values or estimates. It is difficult to respond properly to this question without a feel for the costs of implementing MP085B. We are of the view that MP085B should be approved on the basis that: • The costs would be less than the value of the benefits we have set out; • There are other unquantified benefits associated with requiring all ESMES to meet the requirements of ESMETS v5.2 by November 2028; • There are other unquantified benefits associated with there being a reduced number of live ESMETS versions after November 2028; and	

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Question 10				
Respondent	Category	Response	Rationale	SECAS Response
			Ensuring that DNOs have access to robust consistent data relating to the LV distribution network is a necessary part of a transition to a smart energy system.	
Northern Powergrid Metering Limited	Other SEC Party	No	-	
OVO	Large Supplier	No	-	
Scottish and Southern Electricity Networks	Network Party	Yes	Any costs incurred would be offset by accurate data collation resulting in a reliable and more efficient Network. This will ultimately prove to be a benefit by being able to locate issues on LV feeders, forecast possible future voltage issues and understand increased load moving into the future with more low carbon tech installations.	
Scottish Power Energy Networks	Network Party	Yes	Having a consistent, accurate voltage reading dataset will provide benefit to Scottish Power Energy Networks current asset management processes and will allow further innovative development in this area. As noted in the Modification Report, implementation of MP085A and MP085B aligns voltage profile data with consumption profile data which is measured across a 30-minute period starting on the hour and half-hour. Aligning these measurement types removes this inconsistency and clarifies ongoing device design.	

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets1 Limited	Other SEC Party	No	Costs and risk of asset stranding have not been considered fully nor the benefits quantified.	
UK Power Networks	Network Party	Yes	We believe that MP08B should be implemented because of the benefits that will be delivered to consumers. It is important that all meters installed in consumers premises are fully operational and correctly functioning to deliver the necessary data for all parties providing a service to consumers. The proposed Solution 4 provides the following: • Neutral direct impact on the price of consumers bills • Minimises the number of installed ESME variants. • Enables all devices still in supply chains to be installed and upgraded. • Reduces return and scrappage costs, as well as environmental impacts. • Exceptions available for devices unable to accept updates to ESMET v5.2 or later.	

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	-	
BUUK	Network Party		
Calisen Asset Management Ltd	Other SEC Party	As referred to in multiple responses and set out in Question 1 – any potential changes which may cause stranded meters or result in meters needing to be removed prematurely raises concerns with MAPs. This is because investments are made based on meters being installed for a certain period of time and early removal in volume could limit investor appetite for future smart metering finance and this is another shift in risks from when MAPs considered the original investment. It is unclear from this MOD what the proposal would be if meters could not be upgraded to meet V5.2 requirements. The MOD report states: ‘Lower bills than would otherwise be the case This modification will have a neutral impact on the price of a consumer’s bills.’ Which is not correct – the changes required to firmware to implement this change will be passed to energy suppliers and in turn to consumers through the charges levied through bills. Furthermore, as mentioned elsewhere in this response, if there is a possibility meters will have to be removed that cannot be upgraded,	SECAS has updated the modification report with the comments from the Refinement Consultation regarding lower bills for consumers and environmental damage. This modification is applicable to SMETS2 Devices only as SMETS1 Devices are not governed by the GBCS.

Question 11			
Respondent	Category	Comments	SECAS Response
		this will have a cost to energy suppliers, which will be passed onto consumers. 'Reduced environmental damage This modification will have a neutral impact on environmental damage as existing ESME Devices will still be able to be installed.' As mentioned elsewhere in this response, if there is a possibility meters will have to be removed that cannot be upgraded, this will have an environmental impact. The implementation of MVP dates in the SEC raises questions around monitoring, reporting and compliance of said dates. Processes to complete these would need to be defined and documented as they are not in place currently. The responsibility for this would need to be defined – assume it would be with the DCC, but this would need to be confirmed. As mentioned in previous answers, there would need to be requirements determined where meters do not align to the MVP dates or cannot align as they do not communicate; what then happens? If the assumption is they would need to be removed once the proposed MVP date is passed, there could be a significant value associated with this. This would introduce additional cost and resources for the DCC, and in effect energy suppliers, which would then be passed down to consumers. The MOD does not identify if the change is relevant to SMETS1 and SMETS2 meters – as all are pre-v5.2. This needs to be defined and included in costing of the change.	

Question 11			
Respondent	Category	Comments	SECAS Response
EON	Large Supplier	At what saturation point do DNOs obtain the benefit of the voltage data e.g. would 95% of meters delivering synchronised voltage measurements be sufficient ? If that is the case, then there may not be a compelling requirement to exchange meters that cannot be upgraded. Also note that a proportion of the meters to be exchanged may already be commencing their voltage measurement periods on the required hour/half-hour. Other delivery options that are not so heavy-handed are: (1) Change the Installation Validity Periods so that all ESMES installed after e.g. 1st Jan 2027 need to be ESMETS v5.2 compliant. This will force current manufacturers to produce ESMETS v5.2 compliant firmware and will encourage the deployment of this firmware to already-installed meters without the hard deadline that an MVP termination enforces. (2) Industry/Ofgem to set targets for ESME v5.2 compliant portfolio % at various future dates.	
Landis and Gyr	Other SEC Party	None	
National Grid Electricity Distribution	Network Party	NGED has some concerns about the orchestration of the Refinement Consultation and, depending on the consultation response, there may be a need to re-run the consultation and pose some more targeted questions to establish the costs and benefits associated with implementing the proposed solution. Issues that we feel may need further consideration include:	

Question 11			
Respondent	Category	Comments	SECAS Response
		1. Clarity about the number of ESMES that would be affected; 2. Clarity on the proportion of ESMES currently being installed that are not compliant with the functionality introduced in MP085A; 3. Clarity on the number of ESMES that it would not be possible to upgrade and may need to be replaced; 4. Cost estimates associated with development and implementation of firmware updates; 5. Transparency of the benefits associated with ending the pre ESMETS v5.2 ESMES in terms of enforcing the implementation of earlier SEC modifications, hence ensuring delivery of the benefits associated with those modifications; and 6. Transparency of the benefits associated with having a reduced number of live ESMETS versions deployed in ESMES in terms of the potential to reduce the costs of firmware development and testing to ensure interoperability. There are some aspects of the Modification Report which we feel should be reviewed in its next iteration: 1. Probably due to the length of time since the modification was raised, there is information in the Modification Report that is not current, for example with the current DCC performance it's unlikely that the potential workaround (by collecting voltage data every minute) would be viable.	

Question 11			
Respondent	Category	Comments	SECAS Response
		2.The modification report includes some statements which could mislead the reader e.g. the benefits don't relate to the accuracy of the voltage data nor to faster fault restoration. There are comments workgroup members who don't support the proposal that are not counterbalanced by those stakeholders who do support the proposal – possibly because there were no DNOs at the meeting when the proposals were discussed.	
Northern Powergrid	Network Party	Northern Powergrid has some concerns about the orchestration of the Refinement Consultation and, depending on the consultation response, there may be a need to re-run the consultation and pose some more targeted questions to establish the costs and benefits associated with implementing the proposed solution. Issues that we feel may need further consideration include: 1. Clarity about the number of ESMES that would be affected; 2. Clarity on the proportion of ESMES currently being installed that are not compliant with the functionality introduced in MP085A; 3. Clarity on the number of ESMES that it would not be possible to upgrade and may need to be replaced; 4. Cost estimates associated with development and implementation of firmware updates; 5. Transparency of the benefits associated with end dating the pre ESMETS v5.2 ESMES in terms of enforcing the implementation of earlier SEC modifications, hence ensuring delivery of the benefits associated with those modifications; and	

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Question 11			
Respondent	Category	Comments	SECAS Response
		6. Transparency of the benefits associated with having a reduced number of live ESMETS versions deployed in ESMES in terms of the potential to reduce the costs of firmware development and testing to ensure interoperability. There are some aspects of the Modification Report which we feel should be reviewed in its next iteration: 1. Probably due to the length of time since the modification was raised, there is information in the Modification Report that is not current, for example with the current DCC performance it's unlikely that the potential workaround (by collecting voltage data every minute) would be viable. 2. The modification report includes some statements which could mislead the reader e.g. the benefits don't relate to the accuracy of the voltage data nor to faster fault restoration. 3. There are comments from workgroup members who don't support the proposal that are not counterbalanced by those stakeholders who do support the proposal – possibly because there were no DNOs at the meeting when the proposals were discussed.	
Northern Powergrid Metering Limited	Other SEC Party	The Installation Validity Period was made to handle changes of this nature, and trying to use the maintenance validity period as it currently is does not deliver the intent of the modification. Trying to change the MVP to facilitate this modification would also remove the ability for a drastic measure to be taken in the event it is needed.	
OVO	Large Supplier	N/A	

Question 11			
Respondent	Category	Comments	SECAS Response
Scottish and Southern Electricity Networks	Network Party	N/A	
Scottish Power Energy Networks	Network Party	N/A	
Smart Meter Assets1 Limited	Other SEC Party	We would prefer option 3 – which was ruled out. It is not clear from the report how big the issue is. In the explanation of the issue it states that “<u>some</u> electricity meter Manufacturers begin the measurement period on the hour or half hour” but it would be very helpful to know what % of the market is meters from manufacturers who do and don’t begin the period on the hour / half hour. This may be the proverbial sledgehammer to crack a nut and, if this issue impacts only a small % of meters it may inform peoples’ views differently than if a higher % are starting measurement (i.e. why not try, voluntarily, to work on the suppliers who do need to update their firmware without risking the costs of upgrading and stranding of lots of meters by changing an MVP when they may already be operating in line with the requirement).	SECAS is investigating the number of Devices which do not record on the hour/half hour.
UK Power Networks	Network Party	The modification report recognises there are synchronisation issues affecting ESMEs as a whole and it would be beneficial to look at all synchronisation issues to explore any efficiencies in a solution to a number of problems.	

Question 11			
Respondent	Category	Comments	SECAS Response
		Although this a valid concern it was felt that there is a separate issue to the one defined in MP085B proposal, therefore, the other synchronisation issues should be formally registered and progressed and not left as a statement in the modification report. In addition, MP085B highlights the need to have transparency of the firmware version applied to ESMEs and which devices do not have the most current firmware versions applied.	