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MP162 ‘SEC changes required to deliver MHHS’

Second Refinement Consultation responses

About this document

This document contains the full collated responses received to the second MP162 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
Smart DCC	DCC	Yes	Following extensive discussion within the MP162 workgroups, the proposed solution addresses the requirements that will allow both Suppliers and MDR parties to access half hourly data needed for MHHS. The timing will also allow the industry to move to a shorter settlement period if this is implemented at a later date. We note that the requirements of this modification depend upon alignment and engagement with the wider MHHS implementation programme design work, which is still ongoing.	
Electricity North West Limited	Network Party	No	We do not agree with the solution put forward for the following reasons: 1. Whilst the proposal will provide a mechanism for accessing Half Hour consumption data for Suppliers and Meter Data Retrieval Agents (MDRA) it does not adequately consider the whole system impact across DCC, DSP and CSP services of multiple parties attempting to retrieve consumption data from a consumers smart meter. Specifically, the modification report do not reference how this proposal would address	We note the points around whole system capacity. MP162 was raised to implement the changes needed for market-wide half-hourly settlement (MHHS), and as part of this the DCC has considered the additional capacity that would be needed to account for the extra traffic this will generate. We appreciate the concerns raised around the performance in the North region and agree that this needs to be resolved. However, investigating and developing

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			Network Operator requirements or known system/capacity constraints present in the Communication Service Provider-North Radio Access Network. As such we have to assume these areas have not been given due consideration as part of the preliminary assessment or in developing a solution. It has been acknowledged by the DCC, BEIS and Ofgem that there are under performance issues with the provision of the CSP North service when attempting to retrieve large payloads of data. Unless whole system requirements are considered as part of developing the solution for this proposal there is a high risk that contention for data and CSP network resources will result in further degradation of CSP North network performance. We raised these concerns in our response to the first consultation and we do not believe they have been adequately addressed in the latest modification report accompanying this consultation. 2. The scale of the DCC costs £29m to £59m for this modification proposal (which is unprecedented for SEC change control) requires a much greater level of scrutiny than a standard SEC modification	such a solution would be beyond the scope of this modification and should be resolved through a wider, more holistic approach. We will work with the DCC to provide further justification of its costs through the Impact Assessment and subsequent discussions. We will liaise with the DCC regarding the request to discuss this modification further with the Electricity Network Association Commercial Operations Group.

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			proposal. The solution is being developed at rapid speed but is lacking a detailed justification of the costs by the DCC to enable us to make an informed decision. 3. The consultation period was not sufficient to enable SEC parties to undergo due diligence in absence of a detailed justification of the costs. We request the DCC and SECAS work with the Electricity Network Association Commercial Operations Group to ensure the DCC are undertaking effective stakeholder engagement with its Network Party customers and for the DCC to explain their proposed solution and the rationale for the costs.	
British Gas	Large Supplier	Yes	We agree with the introduction of the User Role for Parties (other than Suppliers) who will be carrying out the Meter Data Retrieval (MDR) service. We are concerned about the impact on DCC capacity and function for the new SEC Parties in the new MDR User Role. We are also concerned about the cost of implementation if the MDR SEC parties are given 'real-time' access to data, i.e. the same TRTs as Suppliers.	There is no requirement from the MHHS Programme for a Target Response Time (TRT) of less than 24 hours to retrieve settlement data. MP162 is not introducing this requirement. If there is a need to change the TRT for Meter Data Retrievers (MDRs) this will need to be considered on its own merits as a separate modification.

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OVO	Large Supplier	No	The 'issue' itself is not clearly articulated anywhere, other than a request from Ofgem to DCC to raise a SEC Mod to ensure MHHS is progressed. There does not seem to be any statement(s) defined anywhere that details the issue the Mod is attempting to address. This should be clearly articulated. It seems that the requirements are listed in the solution but not the problem / issue itself. Is the 'Issue' that there needs to be another Role able to pull HH Profile Data as well as the Role afforded by Suppliers and Network Operators? Does this also need to include that the DCC Demand ability was never set up to include handling an undefined amount of requests for GBT sized message responses? There are Business Requirements and Design Principles. Are these the 'Identified Issues' as set out?	We acknowledge the points made about the issue and will clarify this within the Modification Report.
Northern Powergrid	Network Party	No	We are concerned that the proposal to increase the capacity of the DCC's system does not take into account, or indeed make any reference to, the current capacity issues in the CSP N region. We believe that consideration of the capacity needed to support MHHS must take account of the current constraints already being experienced by users. The opportunity should be taken therefore, to ensure that any changes to the CSP N system will cater for the future demand requirements of Network Parties and Suppliers as well as those of the proposed new Meter Data Retrieval service users. Given	Please see the response to Electricity North West Limited above.

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Question 1				
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			the very significant estimated implementation costs, which will ultimately be borne by consumers, we think that it is essential that a holistic view is taken when deciding whether to / how to increase DCC capacity. Furthermore we are also concerned that the ROM costs quoted by the DCC for this change are both very significant and differ greatly between the lower and upper ROMs (in terms of both absolute size (£) and relative size (%)). Consequently it is very difficult to agree with a solution where we have not had the opportunity to thoroughly scrutinise the basis on which these ROM cost estimates have been developed. It is particularly important that these costs are carefully scrutinised because the cost of this change will be borne by GB energy customers through DCC fixed charges being included in customers' energy bills. Given the significant inflationary pressures in the wider UK economy at the present time, and the extremely significant increases to customer energy bills, we have a duty to ensure that the cost of this change is minimised and that GB energy customers receive the best value for money possible.	
Western Power Distribution	Network Party	No	Whilst we support the intent of the modification we believe that there is still a lack of information and detail around the solution to be able to support it in its current state.	We do not expect the Target Operating model (TOM) to change at this stage of the programme and understand the underlying

Question 1				
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			We don't feel that there is enough recognition of the main MHHS Programme and the need to interact with that. This modification is all based off the TOM, however there is no provision or plan for what will happen if this TOM changes as the programme works through the design artefacts. Requirement 1 states 'This new mapping of MDR Party to MPAN Registration data is expected to be passed to the DCC to use via the new Central Switching Service (CSS) and Enduring Change of Supplier (ECoS) Interfaces. Relevant data extensions will be added to these interfaces. The expectation is that changes to the registration data needed for MHHS will be delivered through the MHHS programme.' There is not enough detail to understand how this will actually work, is it coming from RDP data, or where specifically is this being addressed? This also links to A8. We understand the intent of A8, however we believe that there needs to be further details around this. This is an assumption of an approved consequential change that sits outside the SEC. We wish to see the reference to the other code change that will mean that this assumption is valid. Is this a DTN flow? A CSS message? Who is obligated to send it to who etc. It has also been assumed that an ETD will be populated due to impact on the DSP if it is not but there is	requirements relating to the DCC's technical solution under MP162 are firm. We and the DCC are expecting all registration data for MHHS to come through the Central Switching Service (CSS), and this has been highlighted to the wider programme as the expectation. The changes to the other Codes are being developed through the Cross-Code Advisory Group (CCAG), and we will be working closely with the Codes whose changes relate to the SEC solution. The line in Requirement 4 is erroneous and should have been deleted following the discussions at the December 2021 Working Group meeting. We will correct this in the business requirements document. Section 2.6.5 of the business requirements document confirms there is no expectation on the DCC to validate the User is requesting the correct level of granularity. Consumer consent and the tracking of this does not fall under the SEC. Requirement 5 sets out the different levels of granularity

Question 1				
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			no detail or information about the potential impact to other systems and wider industry. Requirement 4 states 'Users shall inform the DCC where the Service Requests in Section 2.4 are sent for the purposes of retrieving data for MHHS purposes. Where this is identified, extended TRTs shall be operated to enable the DCC to manage the additional Service Request volumes arising from the introduction of the MHHS service.' Where is it detailed how the DCC will be notified that the request is for MHHS purposes? Requirement 5 states 'This will depend on the level of granularity the customer has consented to. It is assumed the level of granularity specified by the customer is the lowest level of granularity that can then be collected by the Import Supplier, Export Supplier or MDR User.' There are no details about how consumer consent is going to be obtained and this information shared, or if/how the DCC will be advised and monitor that the granularity level is correct. Whilst we understand that the PIA currently looks at MHHS completely independently of the Smart Metering infrastructure, we don't believe that it has clearly addressed the known issues around the CSP N issues.	that may be requested, to allow the DCC and Users to develop their solutions accordingly. Please see the response to Electricity North West Limited above.
Utilita Energy Limited	Large Supplier	-	Creation of a new MDR user role is required for the SEC to facilitate changes required for MHHS.	

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Question 1				
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Stark	Other SEC Party	Yes	However, we note the comments made in our response to the first refinement consultation around the requirement for a level-playing field between suppliers and independent MDRs. The MHHS Programme has adopted this as a design principle and thus the misalignment of TRTs between supplier and MDR is a competition issue that needs to be addressed. We understand that this is being resolved separately to MP162.	We note the adoption of the design principle under the programme. Please see the response to British Gas above.
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	No	It is not actually clear from the documentation provided what the scope of the issue and the change is, and therefore whether the solution is appropriate. The 'issue' as set out in the Modification Report is that a new MDRA role needs to be created in order to deliver the Target Operating Model (TOM) that has been approved by Ofgem as the basis for the MHHS Programme. This is reflected in the 'proposed solution' section on page 5 of the Modification Report, which only refers to the creation of the MDRA role as being required. All the changes to the legal text also relate specifically to the introduction of the MDRA role. However, the Modification Report states that the "variable costs are influenced by the MHHS requirements that increase or decrease Service Request volumes sent from	We acknowledge the points made about the issue and will clarify this within the Modification Report. We note your concerns over the DCC's inclusion of the additional capacity required for the anticipated traffic that MHHS will generate. We will request additional information around this from the DCC for inclusion in the modification. We also note your comments about the charging of these costs; this was discussed at the Working Group with the conclusion being that changing the charging methodology around who incurs the costs for change would be a significant

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			Users to the DCC". Those changes in volumes are not related to the introduction of the MDR role, or to any of the changes to the legal text. Those increases in volumes are occurring directly as a result of obligations that will be placed in the supply licences (and most likely in the BSC) to retrieve data from smart meters for the purposes of settlement – and would occur whether the MDR role was created or not. In fact, that increase in data volumes could potentially occur now without any regulatory changes being made; for example, suppliers could choose to settle large volumes of customers on an elective HH basis. This would result in a similar increase in data volumes that would need to be handled by the DCC, but without any changes being made to the SEC to prompt that. It is not clear why the solution for dealing with additional volumes of data (and the associated costs) is being included in this Modification. They are not directly related to the MDRA role, which is the real subject of the Modification, and could be incurred without the need for a Modification if supplier or customer behaviour were to change significantly. Our concern is that this Modification is being used as an incorrect mechanism for DCC to incur the costs associated with the MHHS Programme, by conflating the	piece of work that would be outside of the scope of MP162.

Question 1				
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			MDRA role changes and the volume increases, and seeking to recover costs via the Modification route. This is not the appropriate mechanism. The development and implementation of the solution to enable MDRAs to be able to access data via the DCC should be separated out (and borne by the MDRAs that will use it), with separate consideration given to the costs associated with any increased volume of data, how they should be recovered (and who from) and what impact this might have on the charging methodology being dealt with separately.	
EON Energy Services	Large Supplier	No	There is a statement on Page 7 of the modification report that 'The DCC will be free to schedule tasks within the subsequent 24-hour period' for any tasks that are scheduled, whether by the Supplier user role or the new MDR role. In practice, the window to collect read data and deliver it to Suppliers is much smaller than 24 hours to avoid impacting in day processes such as Install & Commission. Has this been taken in account in estimating the throughput/costs of the solution, or is it assumed that the entire 24-hour window can be used? This question was asked in working group but hasn't been adequately addressed in the updated solution	Further information on the DCC's proposed revisions to scheduling windows will be provided in the DCC Impact Assessment. We will confirm with the DCC that this point has been considered.

Question 2: Do you agree that the legal text will deliver MP162?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes, with caveats	The legal text for MP162 will largely deliver the modification, however the following points will need to be further discussed/addressed in future iterations of this legal text. 1. For the purposes of retrieving settlement data, the requirement for MDRs to use a Scheduled Service in the first instance should also extend to suppliers (for MHHS only, not other uses of HH data). This will support a more efficient use of the system. 2. The assumption is that changes to registration requirements, i.e. the introduction of a new MDR party, will be delivered via MP200 rather than this modification's legal text. 3. The legal text for MP162 will need to align to the wider code drafting of the MHHS programme. This has been raised to the programme forum CCAG.	We will clarify the proposed clause around requiring all Users to schedule Service Requests for MHHS. We note your other assumptions and are monitoring the related changes.
Electricity North West Limited	Network Party	No	See our response to Q1.	Please see the response to Electricity North West Limited in question 1.
British Gas	Large Supplier	Yes	Legal text looks ok	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	The Legal text is as we'd expect for a new Role to act in the capacity and function as set out in the discussions and aligning to the Modification itself. We would like to understand how the MHHSP Design Principles, that directly reference the SEC Legal Text, should be driven by that group. Leading to the wording being updated to meet the requirements set out by the Programme. There are elements being covered elsewhere that are stating the SEC legal updates need changing to meet requirements that, as things stand today, have no associated business case. Which seems to imply our agreement with the legal text may not be the deciding factor in what changes happen. We would like to understand more on the impacts to the SEC and the items being agreed via the SEC Mod Working Group.	Should the programme need to make further changes to the SEC to deliver MHHS then the provisions in Section C7.13 would apply.
Northern Powergrid	Network Party	-	We have no comment at this stage.	
Western Power Distribution	Network Party	No	As mentioned in our response, in relation to Q1, H1.6(f), we wish to understand if the identification in Registration Data is meant to be coming from the DNOs to the DCC? There has been conflicting messages as this modification suggests that it will be provide by the CSS, however we have also heard that the MHHS programme isn't meant to be impacting the CSS and this will need to be provided by	We are not expecting the registration data for MHHS to come via Electricity Network Parties or Registered Data Providers (RDPs), but to come through the CSS. We will clarify the proposed clause around requiring all Users to schedule Service Requests for MHHS.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			the RDPs. Clarification of this process or the consequential code change to implement it is required. We believe that the intent is that all SRVs sent for the purposes of MHHS need to use the same TRTs, however we do not believe that it is clearly defined or explained within the legal text. We believe that H3.13A is not explicit enough to ensure this behaviour. We believe that Appendix AD 3.8.28.1 should explicitly state 'new MDR' and 'old MDR' the same as we have for the supplier rather than just add 'MDR'.	We will add in the clarification around 'old' and 'new' MDRs.
Utilita Energy Limited	Large Supplier	Yes	The legal text allows MDR Users to provide an MDR service.	
Stark	Other SEC Party	No	Section H2A.3 This paragraph unnecessarily restricts the usage of data collected by the MDR and will result in avoidable duplication. It fails to recognise that the MDR could also be acting on behalf of the consumer, typically in the non-domestic sector, as well as the supplier. The MDR is obliged to retrieve data for billing and settlement for both but could have an additional obligation to the consumer, which is not contained in the supplier's licence, to make that data available to them for energy management or even to third parties for other purposes. As currently written, the MDR would have to collect the same data	The intention of the MDR User Role under MP162 is to allow relevant Supplier Agents to be able to collect data for use under MHHS. Further uses of this data are not in scope of this modification. Under the smart metering security framework, all Users with access to consumer data need to undergo the relevant assessments. This will apply equally to the new MDR User Role, who will be able to access consumers' consumption data.

Question 2				
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			once to satisfy the billing and settlement requirement and then a second time as OU to satisfy the other requirements. This is extremely inefficient, resulting in additional costs. It also makes it harder for consumers to access their consumption data and energy management products, which is not compatible with Net Zero nor open data commitments. This in turn will make it harder for the full benefits of MHHS to be realised. The legal text needs to be amended to recognise that data retrieved by the MDR could be required for other purposes. Section I2 We are not convinced of the requirement for MDRs to be subject to the same privacy assessment framework as OUs. Either the supplier or the consumer has nominated the MDRA, who then has an obligation to retrieve data. Consent granularity preferences will be available to the MDR and so they will know whether to collect HH data or register reads. Different approaches will probably be required for domestic and non-domestic to reflect the different opt-out policy approaches. Appendix E DUIS The new set of TRTs for the MDR party results in an uneven playing field, which contradicts agreed MHHS design principles. We understand this is being addressed outside of MP162.	We acknowledge the design principle but note that this has not yet been translated into specific requirements. We continue to engage closely with the programme on this area.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Callisto	Other SEC Party	No	We largely agree that the legal text can deliver MP162, however we have the following comments (all from Annex C): Page 2: Meter Data Retrieval Agent: We don't believe this term is currently proposed within the MHHS programmes design documents – we believe the term is Meter Data Retriever. We believe there has already been some confusion between the MHHS programme MDR and the DCC user role of MDR, do they need to be different to avoid this confusion? page 6 H1.6(f): we are not sure at the time this would happen the MDR would be appointed to any mpans. Although we are not clear on the exact meaning the text in this area we believe a party wishing to become a DCC MDR user would need to prove they could use DCC services before they would be able, in practice, to be appointed as an MDR to any mpan in Registration system. It appears (f) would require them to be appointed first. We also question if the and's in H1.6 should be or's? Page 7 H2 A.2: for clarity we expect the MDR to be appointed by the SDS (who is appointed by the Supplier) rather being appointed directly by the supplier. Page 10 H3.13A – although we may have missed it we do not see a similar requirement for a supplier to use	We will work with the CCAG to clarify the expected terminology that will be introduced under other Codes but will review the use of the 'Meter Data Retrieval Agent' term and see if we can reword the relevant legal text. For Section H1.6(f), we originally mirrored existing wording, but we will review your suggestion for this and amend as needed. For H2A.2, we will review the wording. For H3.13A, the intention was that this would apply to all Users and will review the wording to make this clear. We will review Section I1.2 for your comments and will make changes to this accordingly.

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			scheduled services where they are collect consumption data for MHHS proposes only. Page 11 I: we believe I1.2 also needs updating. We believe the MDR will not be required to have direct consent from the Energy Consumer. This consent will be collected by the Energy Supplier who will request the MDR (via the SDS) to only collect consumption data in line with this consent.	
EDF	Large Supplier	No	We have noted the following issues with the legal text: - There is no mention in the legal text of changes to the charging methodology so it is not clear how MDRA's will be charged for the use of DCC services once they are included in the SEC. It is not acceptable to progress the changes to create the MDRA role without having clarity on how charges will be allocated to that role for the use of DCC services. - H1.6 (f) –this clause appears to mean that an MDRA would need to be appointed before they could apply for a DCC User ID – in which case there will be delay between an MDRA first being appointed, and being able to access data via the DCC. This is not necessary and will lead to delays in data being obtained, it should be enough that they are shown in MDD as a qualified	We reviewed the Charging Methodology when preparing the legal text and considered no changes were needed, as this would align with existing non-Supplier, non-Network Party obligations in this section. As per our response to EDF in question 1, wider charging changes would be beyond the scope of this modification. For H1.6(f) we will review this wording and amend as needed. We will look into the final point and provide further clarity around this.

Question 2				
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			MDRA, rather than needing to be appointed to actual MPANs in order to obtain a DCC User ID. Service Requests and TRTs – it is not clear how a reading obtained by an MDRA using SRVs 4.1.1 and 4.2 could be regarded as being ‘instantaneous’ when it has a 24 hr TRT as noted in the table on page 7 of the Modification Report. When would the ‘instantaneous’ reading be taken on the meter in these circumstances? All the other SRVs noted are reading data that is stored on the meter, so it matters less when the data is retrieved than when it was captured and stored – these SRVs (4.1.1 and 4.2) are taking a reading ‘now’, so there needs to be more certainty on when ‘now’ actually is.	
EON Energy Services	Large Supplier	Yes	The legal text properly defines the new user role of Meter Data Retriever (MDR), the entry processes applicable to role and the rights and obligations of an MDR	

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	-	
Electricity North West Limited	Network Party	No	See our response to Q1. The proposed approach does not adequately consider the whole system impact across DCC, DSP and CSP services of multiple parties attempting to retrieve consumption data from a consumers smart meter – such as Network Operator requirements or recognised system/capacity constraints present in the CSP-North service.	Please see the response to Electricity North West Limited in question 1.
British Gas	Large Supplier	Yes	The implementation approach has been simplified since the First Refinement Consultation and seems sensible. However, as stated in our answer to Question 1, we are concerned on the impact on DCC . We are also concerned about the cost of implementation if the MDR SEC parties are given ‘real-time’ access to data, i.e. the same TRTs as Suppliers.	Please see the response to British Gas in question 1. Any changes to the TRTs for MDRs will be managed as a separate modification.
OVO	Large Supplier	Yes	We agree with the implementation approach but have huge, and material, concerns with the costs presented in doing so, especially for the SMETS1 solution as set out. What is missing in the approach is if ALL DCC Users will be required to uplift to the new version of DUIS at the same time or if this will be up to each User to decide. That then brings forth the issue of different Users being on	Only Users who wish to register in the ‘MDR’ User Role and/or make use of the Service Requests being made schedulable will need to uplift to the relevant version as part of MP162’s implementation. Otherwise, existing Users will not be mandated to uplift to the latest DUIS

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			different versions and how that will be managed. There has never been a requirement for all to uplift at the same time and may set a complex and challenging precedent. If Users can choose, then consider how different Users will manage churn and gaining these. None of which seems to be covered anywhere. Noting that Suppliers not looking to engage a MDR may not wish to uplift unless DCC is planning to put functionality only accessible for MHHS in that version of DUIS? As has been done for the likes of DBCHs and other SEC Mods? This needs to be drawn out and documented, including an envisioned transition approach.	version for MHHS, and can uplift at a later date. Suppliers do not need to register in the 'MDR' User Role if collecting MHHS data in-house.
Northern Powergrid	Network Party	No	The approach does not seem to take a holistic approach of providing DCC system capacity required by DCC Users.	Please see the response to Electricity North West Limited in question 1.
Western Power Distribution	Network Party	No	Whilst we understand that the SEC Modification needs to be implemented ahead of the programme go live date, we are concerned that timescales are tight and therefore solutions and refinement might be rushed through in order to meet the deadlines without necessarily being given appropriate consideration. We are also concerned that this modification is progressing quicker than the main programme and the design detail has yet to be published.	We acknowledge the concerns over the timescales, but are working to deliver MP162 in line with the wider MHHS timetable. We are in close contact with the programme over the wider design, and we understand the requirements relating to the MP162 technical solution are not expected to change at this stage.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	We agree with the timescale - a solution to allow MDR Users to offer an MDR service will need to be in place prior to MHHS go-live.	
Stark	Other SEC Party	Yes	We are concerned that there is not sufficient time between implementation (November 2023) and the start of the MHHS Programme Qualification phase (January 2024) for organisations to build MDR capability and then qualify in time for the start of the Migration phase (October/November 2024).	We note your concern, but highlight that November 2023 is the earliest SEC Release this modification can be included in.
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	No	Putting a deadline of June 2022 on the approval of this Modification is concerning when it is unlikely that the MHHS Programme will have issued a baselined end to end design by this point, and it is highly unlikely that parties will have had a chance to impact assess it. This creates a significant risk that the solution for MP162 will need to be re-worked as a result, adding additional cost to what are already very significant costs to industry parties. The baselining of the MHHS design will also lead to the MHHS Programme undertaking a re-plan for the rest of the programme, which could call into question the need to have these changes in place for April 2024 as originally required.	Please see the response to Western Power Distribution above. Should the implementation date need to change, the Change Sub-committee (CSC) can apply to the Authority in accordance with SEC Section D10.5. However, we understand that a delay to the wider programme would not affect the development costs for the DCC's technical solution.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			Should this Modification be approved it must be ensured that the implementation date can be moved, especially if that will result in more time to develop and test the solution, lower risk and lower overall cost.	
EON Energy Services	Large Supplier	Yes	The implementation dates are in line with the wider MHHS Programme delivery timescales	

Question 4: Will there be any impact on your organisation to implement MP162?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	DCC will work with its service providers to implement the required changes for MP162.	
Electricity North West Limited	Network Party	-	Unable to respond in the absence of a review on the wider impact to Network Parties See our response to Q1	
British Gas	Large Supplier	Yes	There will be impacts on our organisation to implement MP162, however we are not yet at a stage to estimate these. We are in the early stages of setting up our MHH team, and we have not made decisions on our approach and strategy towards the new MDR opportunities – i.e. is this role (and the associated infrastructure) something we would build in house, or outsource, or a combination of the two.	
OVO	Large Supplier	Yes	Technically, there is no impact as there are no changes we would need to make, other than uplifting to a new version of DUIS, MMC and the Schema. The main impact would be in paying the huge costs to enable a new Role to be implemented into the DCC and allow for the uncertainty defined in the Mod Report to allow DCC to manage the unknown demand requirements. Any and all	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			costs will, eventually, be passed down to our end consumers and it is unclear how this is justified when Suppliers can perform these functions today. The way this is charged does not factor this.	
Northern Powergrid	Network Party	No	No impact is envisaged at this juncture.	
Western Power Distribution	Network Party	Unknown	We are currently unable to answer this due to the points raised under Q1.	
Utilita Energy Limited	Large Supplier	Yes	This modification supports a wider change that impacts all Supplier and how they operate and settle electricity on a day-to-day basis. Our response is provided within the scope of <i>only</i> MP162 and does not cover the total impacts of implementing MHHS.	
Stark	Other SEC Party	Yes	We will seek to become an MDR. If the solution does not allow us to operate independently of the supplier, on the consumers behalf, then this will impact our ability to provide an optimal service for the Smart segment under MHHS.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	Yes	We assume that we will be impacted by MP162, however It is difficult to understand the impacts because, as noted	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			previously, it is not actually clear what the scope of MP162 is. As we have already noted, the key reason for MP162 being created, as set out in the Modification Report, is to create the MDRA role within SEC governance and the DCC systems. As a supplier, whether this will impact us will depend on whether we (or our customers) choose to use an MDRA for data retrieval or not. It is too early to be able to make this determination as there is not a baselined design for MHHS which we can use to make any assessment. We will be impacted by the obligation that will be set out in the supply licence to obtain HH data (subject to consumer consent) from all our smart meters for the purposes of settlement. This will have a significant impact on our systems and processes. However, it is not clear if these impacts are to be included in the scope of the changes resulting from MP162, as we would need to collect that additional data via the DCC whether MP162 was implemented or not, as that change in behaviour will be driven by the licence changes, not the changes to the SEC.	
EON Energy Services	Large Supplier	Yes	The precise impact is unknown at this stage as it has not been determined if EONs existing Supplier role will be used to collect HH data, or if an MDR agent will be	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			appointed for that purpose. That decision will determine the changes that EON will be required to deliver to support the MHHS implementation.	

Question 5: Will your organisation incur any costs in implementing MP162?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	DCC costs to the industry for implementing MP162 will be further refined within the upcoming Final Impact Assessment.	
Electricity North West Limited	Network Party	Yes	MP162 as drafted does not impact Network Operators but will have the effect of further and significantly increasing our contribution towards the DCCs fixed charges in order to implement a solution for which it is not clear the CSP infrastructure can support. Whilst we are asked that respondents exclude their share of the central costs from their responses, the proposed cost of this solution is unprecedented in SEC modification history and stands at £30-60 million and as such we must refer too it in our rationale.	
British Gas	Large Supplier	-	We will incur significant costs in implementing MP162, but we are not able to estimate these yet, as we have not yet decided our approach and strategy towards the new MDR opportunities. (See above answer to Question 4)	
OVO	Large Supplier	More than £1m	See Question 4 – the values chosen are based on worst case in the Modification and the potential for the costs to be far higher being they do not include all elements up to implementation. We would also like to understand any work being done to address the often repeated challenge	

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			of allocating costs to defining their requirements. The way SEC Mod costs are split are not reflective of who is asking for the changes, the business case for the change and the parties benefiting. The costs associated for this, that are not split out but need to be, are huge and totally unacceptable for a Role that Suppliers can carry out today. The costs for enabling DCC to handle the demand and the amount of data needed must be drawn out separately so that we can analyse which bits MUST happen to those to enable a function that others will have to pay for, being that the DCC was never designed, and neither was the SEC, via the SMiP, to allow any other Role that the Supplier to do many of the things included in the requirements. The overall demand model and scaling used by the DCC is a matter of many discussions over the years and never considered how MHHS will operate. It seems that is still very unclear and could change while the MHHS Design is still being debated and is, as yet, undecided. Due to that, the costs include variances and uncertainty percentages that push the amounts up to a level when the business case for change is defeated.	
Northern Powergrid	Network Party	No costs	Whilst DNOs will incur no direct costs, our apportioned DCC costs will increase.	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Unknown	Due to the fact that we are still missing details we are unable to confirm exactly what if any costs we will incur. Also we feel we have to highlight the fact that the PIA costs are estimated at £29.1m to £59m as this cost is so significant and will have an impact on all users.	
Utilita Energy Limited	Large Supplier	Up to £100k	Most of the costs associated with the total MHHS programme will arise as DCDA and wholesale costs. We have excluded these, as well as our share of the total cost of this modification from our response to this question. The specific costs with implementing MP162 will be on development and DBT costs associated with our CSS systems. We expect these changes to take around 3 months of DBT time, at a cost of ~75k.	
Stark	Other SEC Party	£500k-£750k	DCC Adapter design, build and test costs. UEPT, security and privacy assessments (if required) etc.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	More than £1m	We assume that we will incur costs as a result of MP162, however it is difficult if not impossible to estimate these costs because, as noted in our response to question 4, it is not actually clear what the scope of MP162 is. As with the DCC, the majority of suppliers' costs are likely to be associated with the overheads for retrieving and	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			processing additional volumes of HH data, however we do not regard these costs (for supplier or, more importantly, for the DCC) as actually being associated with MP162.	
EON Energy Services	Large Supplier	£500k-£1m	EON will incur costs to implement MP162, however they are impossible to estimate at this stage as a decision has not been made about whether to collect MHH data using our existing Supplier role, or to appoint an MDR agent. This decision could significantly impact implementation and ongoing costs	

Question 6: How long from the point of approval would your organisation need to implement MP162?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	-	N/A – DCC will deliver the modification in line with the approved timeline.	
Electricity North West Limited	Network Party	-	-	
British Gas	Large Supplier	-	Not yet known	
OVO	Large Supplier	As soon as approved	Unless there are any changes to what is set out in the Modification Report, we would not need any time to implement MP162, other than having to uplift to a new version of DUIS, which is not something included in the Modification for us to analyse. Functionally, that uplift could happen as soon as we're ready to uplift and should not inhibit our ability to engage in using DCC Services for MHHS, as we can schedule the data today using our existing Roles. The outstanding question lies with there being anything specific to MHHS that the DCC may implement in DUIS or MMC that we'd need.	
Northern Powergrid	Network Party	-	Not applicable since no impact to Northern Powergrid is envisaged.	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Unknown	Please refer to Q4.	
Utilita Energy Limited	Large Supplier	-	November 2023 SEC would provide enough time for Utilita to make any required changes resulting from this modification.	
Stark	Other SEC Party	6-8 months	This depends how long it takes to complete the relevant DCC User entry processes for the MDR role.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	18 months	As with the previous two questions the amount of lead time required will depend on what we are required to deliver specifically as a result of the implementation of MP162, rather than to deliver our licence obligations and the MHHS arrangements more generally.	
EON Energy Services	Large Supplier	-	Implementation timescales are unknown at this point, it depends entirely on the route EON chooses to collect the MHH data	

Question 7: Do you believe that MP162 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	Modification 162 will better deliver the following SEC Objectives as noted within the modification report: - Objective (b), as implementing the changes needed to deliver MHHS will allow the DCC to comply with the requirement introduced into the DCC Licence to facilitate the implementation of MHHS. - Objective (c), as the delivery of MHHS will enable consumers to benefit from more accurate allocation of their consumption within settlement. - Objective (g), as delivering the SEC and DCC changes for MHHS will enable the wider programme to be delivered as planned.	
Electricity North West Limited	Network Party	-	-	
British Gas	Large Supplier	Yes	We agree with the Proposer's views that this will better facilitate Objectives (b), (c) and (g).	
OVO	Large Supplier	Partially	We believe MP162 better facilitates SEC Objective (b). We do not believe it better facilitates SEC Objective (c) as nothing being implemented by this Mod affects the ability of an Energy Supplier to obtain HH Profile data today and	

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Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			allocate it for Settlement, be that HH or NHH. The Mod is not changing that. We are unsure how the Modification itself facilitates the efficient and transparent administration and implementation of the SEC though?	
Northern Powergrid	Network Party	No	We are not convinced, as the proposal does not consider increasing DCC capacity holistically, which is the most efficient solution.	
Western Power Distribution	Network Party	Yes	We believe that the intent of this modification would better facilitate the General SEC Objectives.	
Utilita Energy Limited	Large Supplier	Yes	B – allows for appropriate changes to be made to DCC systems to support its MHHS licence conditions.	
Stark	Other SEC Party	Yes	We have provided rationale in the previous consultation, which was subject to caveats around fair competition.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	No	To be clear, we are supportive of the MHHS Programme, and of the creation of the MDRA role where suppliers want to choose that route to retrieve data from smart meters for settlement purposes. However, there are too many outstanding questions regarding MP162, including the scope of the change, what DCC costs should be associated with MP162 specifically, how those costs will be recovered and who	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			from, to be able to understand whether the implementation of the proposed solution would better facilitate the General SEC Objectives.	
EON Energy Services	Large Supplier	Yes	We believe that the changes will better facilitate SEC Objectives (b) and (c) as they will allow the DCC to support the wider MHHS implementation, and therefore enable better management of energy use because of more accurate consumption data	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP162 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	The business case provided by Ofgem suggests an overall consumer benefit of up to £4.6b up to 2045 if MHHS is successfully implemented. MP162 is a part of that implementation. This is in addition to supporting future change that will allow wider optimised use of low carbon generation within GB.	
Electricity North West Limited	Network Party	No	Access to a consumers consumption history will be a key requirement for future provision of switching services. It is not clear that SECMP162 considers this future use case and as such it is likely that further costs will be incurred as a result in future.	
British Gas	Large Supplier	Yes	The MHHS programme is expected to bring considerable benefits to consumers, and MP162 is a key component of implementing that programme. We are not sure of the benefit to consumers of the introduction of TRTs for MDR users at the same level as those for Suppliers. The extra costs expected to be incurred to deliver these will be passed through to consumers through Supplier bills, and we are not convinced that these will be cost-beneficial for consumers. (i.e., is the value to consumers of MDRs	

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			having near real-time data sufficiently high to justify the costs to deliver this)	
OVO	Large Supplier	Yes	As noted, the cascade of costs will have a material impact on consumers. Any and all central costs, especially of this magnitude, affect consumers in some way. The benefits are linked to the DCC being able to manage the demands required of them that MHHS requires although we do not see any benefits in the addition of a new Role to our consumers. Obtaining more granular data and processing that into settlements is the way we want to go and benefit from that. This Mod covers some of the items needed, such as the DCC being able to handle the volume of data needed, but not others. None of which stops us being able to do this today if a Supplier chose to electively.	
Northern Powergrid	Network Party	-	Please see our response to question 1.	
Western Power Distribution	Network Party	-	We disagree with the comment in the modification report 'More frequent collection of consumption data could allow faults on the networks to be identified and rectified faster.' as this modification will not have any impact on the DNOs ability to monitor and repair faults on the network.	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	No	There will be no specific benefits to consumers because of this modification. The MHHS programme may see more TOU tariffs offered.	
Stark	Other SEC Party	Yes	We have provided rationale in the previous consultation which remains relevant. However, this is contingent upon the MDR being able to operate independently of the supplier and to not be restricted in how the data they collect is used.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	No	The MHHS Programme itself is likely to deliver significant benefits to consumers and we support the MHHS Programme on that basis. What is not clear is the extent to which MP162 is required to deliver those benefits. We can understand how the MDRA role could be used by suppliers to retrieve data more efficiently and therefore reduce the costs that are ultimately passed on to consumers through their bills. However, who retrieves data for settlement and how is otherwise likely to be entirely transparent to consumers.	
EON Energy Services	Large Supplier	Yes	There is medium to long term potential for consumers to benefit from these changes through lower energy costs, assuming that MHHS is widely adopted. EON believes	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			that the changes will also support innovation in terms of the propositions offered to consumers.	

Question 9: Noting the costs and benefits of this modification, do you believe MP162 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Smart DCC	DCC	Yes	Consumer benefit as noted in response to question 8, plus wider obligations on all MHHS Parties to implement this Ofgem sponsored programme.	
Electricity North West Limited	Network Party	No	See our response to Q1	
British Gas	Large Supplier	-	N/A – waiting for the IA We are concerned about the costs of this modification (especially if the MDR user role TRTs are set as the same as those for Suppliers). We have not yet seen the impact assessment (which is due to be published Monday 7th March, after this consultation's closing date of Friday 4th March), but the rumoured estimates are extremely concerning. We are not yet able to respond on the costs and benefits.	
OVO	Large Supplier	No	We do not believe the costs justify the requirements as set out and provide any benefits to outweigh the values set out. We would like the costs split out to factor what these costs look like without the MDR Role changes and only the Demand and capacity costs. We would also like to highlight again that this Mod does not cover off all the	

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Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			changes required of both the DCC and the SEC in being able to manage the requirements, as yet undecided, of the MHHS Programme.	
Northern Powergrid	Network Party	No	Please see our response to question 1 and 7.	
Western Power Distribution	Network Party	No	Whist we support the intent of the modification we believe that there is still a lack of information and detail around the solution to be able to support it in its current state. Also the costs, not only of this modification but Users too, is significant and needs to be justified.	
Utilita Energy Limited	Large Supplier	-	Insufficient cost information to make a decision We accept DCC system changes that are required to allow MDR Users to operate and provide a service to Parties. Utilita would however further welcome discussion on costs related to capacity enhancements. Our foremost concern is that by approving this modification in its entirety at this stage we are accepting all costs associated with capacity improvements. We would welcome further clarity on how much capacity is required for the solution, associated cost for that capacity, and discussion around how that capacity should be paid for.	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			Bundling capacity costs and creation of a new user role into the same modification makes acceptance of this modification difficult; we wish to see DCC system changes made to allow MDRs to provide a service, but also wish to see further scrutiny applied to costs and cost apportionment associated with capacity.	
Stark	Other SEC Party	Yes	It is required but needs amending – TRT issue etc.	
Callisto	Other SEC Party	-	-	
EDF	Large Supplier	No	As noted in our responses above there are just too many outstanding questions, especially in regards to the level of DCC costs, whether they should actually be associated with this Modification, who they will be recovered from and how, to be able to support this change at this time.	
EON Energy Services	Large Supplier	No	It's unclear how the cost of this change is going to be finalised given the current uncertainty around Suppliers' approach to collecting it. The maximum exposure is £59m IF the modelling done to date is valid but could be higher depending on actual behaviours. Is there an option to approve fixed costs at this point and return for final approval of variable costs when Supplier intentions are better understood?	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			If not and the Modification is approved as currently presented, how will final costs be tracked and what Governance will be in place to approve spending beyond £59m?	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Smart DCC	DCC	The draft legal text has been provided earlier than expected for this modification, however we are happy to provide input.	
Electricity North West Limited	Network Party	Electricity North West remains of the opinion that the most cost-effective model for accessing Half Hour consumption data would be to ensure that it needed to be read from a consumers meter once and once only. After the data has been retrieved it would then be stored in a secure data repository for retrieval by any authorised user as needed. This would include Suppliers, Network Operators and Other Parties e.g. energy switching service providers.	A caching solution for SMETS1 Devices has been included in the DCC's solution. The SEC security framework means a similar approach is not permissible for Smart Metering Equipment Technical Specifications (SMETS) 2+ Devices, and so this option was not pursued under MP162.
British Gas	Large Supplier	-	
OVO	Large Supplier	We have concerns about changes that will arise from the MHHS Design Workshops that are not included in this Mod at this stage. There has already been mention of Suppliers needing to reconcile the Profile Data against the Billed Register Data. As set out in the Modification report, the overall wider end to end processes have not been looked at and the changes required to Users to enable MHHS are not agreed. The MHHS Programme has stated SEC and DCC will agree these. They are not in this Mod so we'd like to know when and where these will be covered and how any changes that stem from them, and the MHHS Programme, will be picked up and tackled. The behaviour of the new Role needs to factor into the solution already	We originally anticipated that MP162 would pick up all the changes required under the SEC for MHHS. However, due to delays with the wider programme since MP162 was raised, the full design will not now be baselined before MP162 needs to progress to decision to meet the final MHHS end-dates. We now believe a further SEC modification will be required to pick up any further consequential SEC documentation changes, but these are not

Question 10

Respondent	Category	Comments	SECAS Response
		implemented under the SMiP otherwise change is needed. Change that will need a Modification and to be paid for by SEC Party's, unless it can be done via the Elective Communications Services offering by the DCC, although that cannot apply to Core Services. We'd also like to understand when the testing requirements will be defined and how they will be developed and paid for. Noting that the DCC does not have the ability to test increased demand of its services that this Mod is proposing to implement. How will the increase in demand needed for MHHS be tested and who will be paying for that? In what environments will this be done? At a time of energy costs increasing and the price hikes being experienced by all, especially end consumers, the costs for this Modification are alarming and need addressing to achieve the benefits MHHS can provide. The potential for half a £Billion being needed to achieve the changes do not stack up at this stage, and that is without any changes to TRTs or enabling a new Role to have the same abilities a Supplier has.	expected to require DCC System changes. We will update the Modification Report to reflect this. Further information on the DCC's proposed testing approach will be provided in the DCC Impact Assessment. We will follow up on this point with the DCC. We acknowledge the point around the costs. This modification will be issued to the Authority for final determination, and the Authority will be able to consider this modification as part of the wider costs and benefits case for MHHS.
Northern Powergrid	Network Party	-	
Western Power Distribution	Network Party	-	
Utilita Energy Limited	Large Supplier	-	

Question 10			
Respondent	Category	Comments	SECAS Response
Stark	Other SEC Party	-	
Callisto	Other SEC Party	-	
EDF	Large Supplier	-	
EON Energy Services	Large Supplier	To what extent will Supplier behaviours be considered in determining the charging model for this change, if at all? Is the intention to smear the costs irrespective of whether Suppliers choose to collect the data once for all purposes, or collect it separately for HH settlement and other purposes? If so, this may be a disincentive to use the new capabilities as intended/preferred by the DCC. There is reference to Export supplies in the updated modification report. EON and EON Next is not currently a DCC Export User – to what extent is HH settlement mandated from an export point of view?	No changes are proposed to charging under MP162, and the costs will be allocated across Users as they currently are. We will investigate the question around Export Suppliers and provide further clarity.