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MP162 ‘SEC changes required to deliver MHHS’

Third Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the third 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**
Scottish and Southern Electricity Networks	Network Party	Yes	Whist we agree with the solution and support the intent of the modification, we believe that there is still a lack of consideration on the total impact of the DCC and CSP infrastructure related to the increase in traffic across the network brought in by the implementation of this modification. We agree that the proposal will provide a mechanism for accessing Half Hour consumption data for Suppliers and Meter Data Retrieval Agents, however it does not adequately review the whole system impact across DCC, DSP and CSP services of multiple SEC parties attempting to retrieve Half Hour consumption data. We also believe that without understanding the total system capacity impacts, it will result in further restraints against the known issues regarding the current/future CSP North network performance. Although we understand the scope of this modification, we would support any impact analysis alongside the proposed solution. We believe the opportunity should be taken to ensure that any changes to the total smart meter system will cater for the future demand requirements of all	We note the points around whole system capacity. MP162 was raised to implement 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. The DCC's SEC Modification Design team has carried out analysis in conjunction with the DCC Demand Management team, other DCC programmes, and the Service Providers on the current and projected impacts of MHHS on the DCC Total System, including both Smart Metering Equipment Technical Specifications (SMETS) 1 and SMETS2. Other DCC programmes include the Network Optimisation work planned for the Communications Service Provider (CSP) North. This has allowed the DCC to forecast the impact of MHHS on the DCC

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			SEC parties alongside the proposed new Meter Data Retrieval service users.	Total System and include any associated costs in this modification. There are other programmes tasked with reviewing the CSP North network, and the DCC Demand Management team is responsible for current and future network performance overall. The DCC SEC Modification Design Team has been proactive in the capacity planning working with other programmes within the DCC and the Demand Management team to ensure there is no duplication of work or costs.
OVO Energy	Large Supplier	No	The issue, reworded since the last Consultation, is now to implement the OFGEM TOM in full. This Mod is only looking to deliver some of the changes required to the SEC and DCC for MHHS to be enabled. This means there are other elements, as yet undecided and raised, that will be raised under separate Mods. As such it is not delivering the changes required for implement the full TOM.	We agree that there may be further consequential changes required to the SEC, for example where industry terms change. These will be identified and addressed within the Cross-Code Advisory Group (CCAG) governance group.
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	

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			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, of particular note is REC modification R0044.	
Electricity North West Limited	Network Party	Yes	We agree the solution will resolve the identified narrow scope of this proposal in terms of providing a mechanism for allowing third party 'Meter Data Retrieval Agents (MDRAs)' – a new role created through the Market Wide Half Hourly Settlement (MHHS) design to be able to access smart meters and collect half hourly consumption data for settlement purposes. However, as per our previous responses to the first and second consultations for this modification proposal, this solution does not consider the whole system impact multiple SEC Users attempting to retrieve Half Hour consumption data from smart meters. The MP162 Modification Report accompanying this consultation acknowledges that the DCC expects a significant increase in the amount of traffic on the DCC Systems because of the MHHS solution[1]. Our concern remains that this increased volume of traffic will cause further service	Please see the response to SSEN above.

[1] MP162 Modification Report, Version 0.6, dated 3 May 2022 - page 8, second paragraph

Question 1				
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			degradation in Communication Service Provider (CSP) service performance for SEC Users. We note that the latest Modification Report states that the DCC acknowledged that there are wider use cases that will impact on capacity but highlighted that these are outside the scope of MP162, and it only assessed the capacity needs for MHHS under this modification. The report also states that the DCC has commenced a wider piece of work looking at holistic capacity needs. We will continue to support industry wide collaboration with the DCC and BEIS regarding any wider piece of work. We would recommend that the DCC team working on whole system capacity issues liaise closely with the DCC team working on this modification and any other SEC changes required to deliver the MHHS solution.	
Utilita Energy Limited	Large Supplier	-	In our previous consultation response, we highlighted concerns around combining the creation of the MDR User role with the provision of changes to address capacity concerns. These concerns have not been addressed. However, we recognise the solution has been altered to make better use of existing capacity through the introduction of peak/off-peak windows. Whilst positive, this does not address the fundamental concern. We are still concerned with the cost recovery of the modification. This User role will likely not be required by	Based on the assumptions and designs in the DCC's full Impact Assessment, and based on the capacity analysis carried out, the DCC believes that the capacity increases from MP162 will cover the increased loads associated with the MHHS changes. The SEC Charging Methodology is not within the scope of this modification. To introduce this now would disrupt the

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			all Suppliers and does not facilitate MHHS regardless of Ofgem TOM. However, all Parties will be charged regardless of how they choose to collect MHHS data.	timeline. We are looking more widely at the Charging Methodology, and initial work has been carried out around whether other User roles should be charged – a modification to look at this further is expected to be raised soon.
IMServ Europe Ltd	Other SEC Party	No	This current proposal, adding in peak and off-peak windows, does not adequately solve the need for fair and equal access to smart meters for the purposes of MHHS. It significantly disadvantages independent MDR agents and is therefore not fit for purpose.	We note that this question is being considered by the Design Advisory Group (DAG) under the MHHS programme. In the interim, the MHHS Programme provided the steer in December 2021 to continue with the solution as currently set out under MP162. If the programme concludes that further changes are needed in response to this concern, we would be happy to support a further modification to address this. We continue to engage very closely with the MHHS Programme to ensure MP162 is aligned with the wider MHHS solution. We are unclear whether there would any material disadvantage to independent MDRs in the data collection timings as the data could still be collected and submitted

Question 1				
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				into settlement well in advance of the deadline.
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	No	The solution put forward is not effective because it advantages the supplier over the MDR. An effective solution would ensure equivalent and equitable access to consumption data for any party collecting it for settlement, MDR or Supplier. The MHHSP has adopted the idea of a level-playing field as a design principle but this appears to have had little influence on the SEC/DCC design. Under the solution as it stands, MDRs will start to receive scheduled data 10 hours later than the supplier and on-demand data 24 hours later. This is very far away from a level-playing field.	Please see the response to IMServ above.
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. We still feel that there is a misalignment to the main programme. The main programme is still discussing design, and in particular the level playing field principle, specifically in relation to TRTs. At the moment, this proposed solution does not support this principle as the Suppliers can gather this information with a 30s TRT and an MDR cannot. This is as per H3.13A in the main legal	Please see the response to IMServ above. DCC Operations, and in particular DCC Demand Management, will be tasked with business-as-usual monitoring of the DCC Total System and any associated remedial work.

[2] The AIMDA response was submitted as a collective response on behalf of seven Other SEC Parties (Energy Assets, IMServ, Siemens, SMS Plc, Stark, TMA Data Management and WPD Smart Metering)

Question 1				
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			text and section 20 in Appendix AB. This view is also supported by the TABASC comment that the MDRA role was planned to be competitive. We note the comment that a new modification would have to be raised if the TRT requirement was to be changed and this would not result in an increased cost, however this does not allow us to consider a full MHHS solution from a cost benefit perspective at this time. Section 2.6.6 in the Business Requirements states that the DCC will monitor User behaviour with regards to the proportion of On-Demand vs. Scheduled Service Requests. We don't believe that there is enough detail around exactly what this means and how it will be undertaken, as the FIA explicitly states that there are no specific requirements to reporting and no changes to the DCC TOC Reporting solution.	
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 agree with the principle of the proposed 'peak' and 'off-peak' scheduling windows, and this should help with the previous concerns of the impact on DCC capacity, but – depending on the actual volume (which is difficult to forecast, for these very new services), it may still not completely remove the risk of impact on DCC's capacity	The DCC acknowledges there is a risk around forecasting usage, as shared with the Working Group. DCC Operations, and in particular DCC Demand Management, will be tasked with business-as-usual monitoring of the DCC Total System and any associated remedial work.

Question 1				
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			and wider function. We are still concerned on this (as raised in our response to the second refinement consultation). We are concerned about the costs, and the timing of the investment versus the re-tendering of the DSP role, which we think could lead to an unnecessary overspend of £10m.	Customers will not be "double-charged" for this modification as changes implemented by the MHHS programme will be included in the re-procured Data Service Provider (DSP) without any further charge. The DCC also highlights that the DSP costs only makes up around 20% of the total DCC cost of the MHHS programme.

Question 2: Do you agree with the DCC's proposed 'peak' and 'off-peak' scheduling windows and its approach to allocating and managing scheduled Service Requests across these periods

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	Yes	We note that 'peak' and 'off-peak' will only be successful if all parties collecting half hourly consumption data for the purposes of MHHS are subject to these scheduling windows. It is our understanding that only the "MDR" role will be, therefore if a supplier role decides to collect themselves, they can do so outside of the scheduling windows	The new Section H3.13A will apply equally to all users regarding accessing data for settlement purposes on a scheduled basis. Suppliers retain a shorter TRT for on-demand requests as this is additionally used for non-settlement purposes.
OVO Energy	Large Supplier	Yes	This makes sense to spread the load although we would question why the Export Supplier is being treated the same as the MDR with it's requests. Although we note the principle of the Level Playing Field, this is not really applicable to an Export Supplier who will be doing other things with the Profile Data, most likely using the same systems as an Import Supplier to do so, and so impacted in the same way. We were informed the Windows were only applicable to MDRs. Can we understand why this have been decided as we'd expect that to be clearly drawn out in the Mod Report and it isn't. It must also be noted that, although there is a need for DCC to manage demand, there are no obligations upon	

Question 2				
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			Users to manage TSPs. This has recently caused Users issues and, without any obligations, there is very little to stop any future issues being faced.	
Smart DCC	DCC	Yes	Creating a new scheduling window will shift SRV volumes away from the existing scheduling window. This will allow flexible configuration mapping of the user role/window, avoiding capacity issues and the need to change DUIS.	
Electricity North West Limited	Network Party	Yes	We note that 'peak' and 'off-peak' will only be successful if all parties collecting half hourly consumption data for the purposes of MHHS are subject to these scheduling windows. It is our understanding that only the "MDR" role will be, therefore if a supplier or network party decides to collect themselves, they can do so outside of the scheduling windows	Please see the response to SSEN above.
Utilita Energy Limited	Large Supplier	-	As a principle, Utilita generally approve change that delivers cost-efficiencies and makes best use of the DCC network. Notwithstanding the above, we are concerned about the potential implications that could arise from this modification regarding DCC capacity and ability to deal with large volumes of traffic, particularly prepayment top ups.	As noted above, the DCC Demand Management team will be tasked with monitoring, and if needed, modifying, the DCC Total System in response to changing traffic volumes and profiles. No previous requirements for collecting data from meters were included in the DCC Total System until this modification.

Question 2				
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			Whilst we note the inclusion of Northbound Prioritisation, it does not go far enough to allay concerns about the DCC's ability to deal with the large volumes of traffic. *Additional confidential information provided.* We are disappointed that the original system spec did not account for Users collecting available data from their meters.	
IMServ Europe Ltd	Other SEC Party	No	The concept of peak and off-peak windows clearly provides a better level of service to in-house agents of suppliers who choose to collect MHHS data versus independent agents using the MDR role (and therefore those customers of independent agents). The two-tier system created is anti-competitive and contravenes the agreed MHHS Programme Design Principle of a level playing field for all participants. The DCC must provide the same service to all participants irrespective of their role to prevent market distortions.	Please see the response to question 1 above.
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	No	This directly contravenes the MHHSP level-playing field design principle. MDR users will start to obtain settlement data for processing 10 hours after suppliers using in house capability. This is a significant head start with the first settlement run being expected after a few working days and performance targets to be placed around it. It also confers the supplier using an internal agent a significant advantage for the other uses of that settlement	Please see the response to IMServ on question 1 above. Design assumptions and principles were approved by the Working Group, and were used for the DCC's Impact Assessment. Delivering the entire MHHS capacity during the peak window would significantly

Question 2				
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			data. For example, a supplier performing retrieval internally will have data available for forecasting much earlier than a supplier who has chosen to use an external MDR. The competitive advantage flows through to the supplier who has been able to get the data faster. A different approach for managing Transactions Per Second (TPS) that does not disadvantage a particular party should be explored. A randomisation approach where responses to both IS and MDR are spread evenly across the day would achieve this. Alternatively, the DCC should procure sufficient capacity to deliver the entire MHHS volume during the Peak window.	impact the DCC Total System, and leave large amounts of purchased infrastructure unused during the rest of the day.
Western Power Distribution	Network Party	-	We agree that any change to the scheduling windows should be explicitly for MHHS SRVs and should not impact other DCC Users. We are also concerned that the DCC are potentially still not fully considering the wider capacity needs and increased traffic, especially with Network Parties due to increase the volume of traffic significantly over the coming months. We are also concerned that there has not been enough consideration about the known network issues. How can the DCC confidently say MHHS traffic will not impact smart metering traffic? How can the DCC confidently say that this proposed solution will effectively enable MHHS?	Please see the response to SSEN on question 1 above. The DCC requested input for the scenario modelling form SEC Parties through the Working Group and the Technical Architecture and Business Architecture Sub-Committee (TABASC). It has shared and requested approval for the design assumptions and principles and the system design with the Working Group. If there are changes to the requirements before Go Live, it may be necessary to raise a Change Request against the

Question 2				
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			We are also very interested to understand the impact and potential costs that this specific proposal will have on those Parties it directly impacts.	system design. If the assumptions are changed, then there could be an impact on the design, and post-implementation, the DCC Demand Management team will be responsible for managing the Total System
British Gas	Large Supplier	Yes	We agree with the principle of the proposed 'peak' and 'off-peak' scheduling windows. In principle should help with the previous concerns of protecting the DCC performance across all its activities. However, depending on the actual volume (which is difficult to forecast, for these very new services), it may still not completely remove the risk of impact on DCC's capacity and wider function. We are concerned as to what happens if actual data traffic (particularly in the 'off-peak' window) is higher than those that have been forecast. If the required traffic can't be managed during the 'off-peak' time, what is planned? Will daily reports (which will be needed to support various tariff or other customer offerings) risk being delayed 24 hours until the next 'off-peak' slot. And then a few weeks later, if the backlog still can't be cleared, will that delay be 48 hours? We agree that DSP will need to balance scheduled messages with on-demand during expected peak / off peak times, but don't quite understand how this is	As noted above the DCC Total System will be monitored as part of business-as-usual activities, and if the system is being impacted, the DCC Demand management team will be responsible for managing the situation. The functionality to prioritise on-demand requests over scheduled requests during the off-peak window is a result of the Northbound Processing change. The peak and off-peak times will be same at weekends and bank holidays but will be managed if required. The DCC Demand Management team will manage any changes to the windows; and will report regularly to the Operations Group (OPSG). The CSP North was asked to provide optimal window times, and has responded.

Question 2				
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			proposed to happen. Page 8 of the Modification report says: "The DCC will also ensure that on-demand Service Requests sent during the off-peak scheduling window are prioritised over scheduled Service Requests." However we didn't think this was possible for DCC/DSP to do this. We are concerned in general at the uncertainty on data traffic forecasting as referred to in the DCC IA. It is recognised that MHHS and the MDR role in particular will open up new market opportunities for both Suppliers and others in the industry. However, it is really difficult to forecast what that will mean in data volumes, yet the DCC build is being constructed to deliver a set forecast volume. Qn - Will the peak and off peak times be the same at weekends and Bank Holidays? (Or will these be used for maintenance – eg DCC technical refreshes are currently over the weekend) Qn – What will be the governance process if the peak and off-peak windows need adjustment in the future? Qn – Why is the CSP North peak window until 08.00, rather than 07.00? In summary, we agree with the proposed 'peak' and 'off peak' scheduling, but we are concerned about the cost and operational impacts of the DCC turning out to have insufficient overall capacity, if the underlying forecasts for demand quickly turn out to be too low.	The DCC carried out 'scenario modelling' in the Preliminary Assessment, based on the requirements and Service Request Variants required for MHHS as provided by Ofgem. Other inputs to the model were shared and agreed with the Working Group and published in the Preliminary Assessment (section 5.4 onwards). The assumptions and issues for the volumetric modelling were included as a file attachment. The results of the modelling in terms of additional load over the network and rough order of magnitude costs to support the different scenarios were shown in the Preliminary Assessment. The Working Group approved using the parameters based on the 'low' scenario. The Preliminary Assessment figures are a good indicator of what the DCC forecasts will happen as traffic increases. The DCC Demand Management team will be responsible for monitoring and updating the configuration. The Demand Management team regularly share capacity review updates in OPSG meetings.

Question 2				
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			In order to approve the Modification proposal, we think that there is more information required: 1. More detailed technical figures on how the current conclusions on volumes were reached, if possible 2. What are the maximum volumes that can be handled by the currently proposed solution, as costed in the DCC IA, and what are the factors that drive this? 3. What are the costs for the next increment (and what is that increment, is it known?) in volumetric capability and at which point (ie how much lead time) would they need to be implemented. How far in advance of reaching maximum capacity would we need to commit to further costs? 4. How will we monitor where we are along that line of reaching maximum capacity (or not) – not just in terms of actual volumes, but companies' plans for eg new tariffs, and how will this balance between capacity and potentially commercially sensitive plans be managed? 5. What time/resource assumptions have been made for recovery from unplanned significant outages (as well as the normal maintenance etc windows mentioned)	

Question 3: Do you agree that the legal text will deliver MP162?

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	Yes	Yes, noting the limitations of scheduling to the MDR role only.	
OVO Energy	Large Supplier	Yes	-	
Smart DCC	DCC	Yes	We are supportive of the revised legal text including the revision of H3.13A, which now applies to all users that may request data for use in electricity settlements.	
Electricity North West Limited	Network Party	Yes	See our response to Q2	
Utilita Energy Limited	Large Supplier	-	No comment	
IMServ Europe Ltd	Other SEC Party	No	On the same basis, that the MDR role is treated unfairly.	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	No	Given our responses above, we cannot agree with the legal text.	
Western Power Distribution	Network Party	Yes	We believe that the legal text will deliver the proposed solution.	The passing of MDR data to the CSS is outside the scope of the SEC solution.

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			However, we still seek clarification with regards to Business Requirement 2.2, legal text section H1.6(f). Whilst we are grateful for the additional detail, stating that this information will be passed to the DCC from the CSS, it is still unclear where this information is being generated, i.e. how is the CSS being advised of the MDR? There is no mention of this within the solution nor of any consequential change that would be required to ensure that the implementation of this modification is successful.	This part will be considered by the wider MHHS programme and changes have been raised under REC Change Proposal R0044.
British Gas	Large Supplier	Yes	No issues identified with the legal text.	

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

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	-	
OVO Energy	Large Supplier	Yes	We agree although we feel the time scales noted are ambitious and, noting this is not the implementation of all the changes needed, there are items still under heavy discussion with the MHHS Programme that need addressing. That means it's likely other items will need implementing too.	We acknowledge that further changes to the SEC will be needed to pick up the remaining changes. We will be working with the MHHS Programme to develop these changes in line with the wider programme timetable.
Smart DCC	DCC	Yes	-	
Electricity North West Limited	Network Party	-	Unable to comment. The implementation date is driven by the MHHS programme plan.	
Utilita Energy Limited	Large Supplier	-	We note that MHHS migration begins relatively soon after the modification release date. These timescales leave little room for any delays; implementation must ensure it provides appropriate time and opportunity for Users to test the E2E solution.	The DCC has planned the release with its Service Providers based on their implementation requirements and believes the timescales are appropriate.

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
IMServ Europe Ltd	Other SEC Party	Yes	Subject to the resolution of the above competition issues and the outcome of the MHHS programme replanning activities.	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	No	Given the competition issues we have raised, we believe that implementation should be delayed to address the design defects.	
Western Power Distribution	Network Party	-	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 that MP162 is progressing ahead of the wider solution design and have been actively working with the MHHS Programme throughout this modification to mitigate any risks arising from this. There is a dependency on the wider MHHS programme to deliver the interface specification and implementation, and this is part of the DCC's engagement in other programmes and design groups. The DCC has planned the release with its Service Providers based on their implementation requirements.
British Gas	Large Supplier	Yes	The implementation approach has been simplified since the First Refinement Consultation and seems sensible.	Please see the responses to questions 1 and 2 above.

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			However, we are concerned over the implementation timeframe, when compared to the timeframe for DCC re-tender for the DSP services. We will need both the old DSP and the new DSP to design, implement and test this complex build, but the old DSP will only operate this for 6 months, before the new DSP takes role. We estimate this will result in over £10m of extra costs, that will add to consumer bills. (£9.3m duplicate build, plus extra time for industry entities to test and integrate.) Please also see our response to Question 2 above on volume/capacity.	

Question 5: Will there be any impact on your organisation to implement MP162?

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	Yes	Through this modification directly – no, however without understanding the indirect impacts, such as whole system performance due to increased traffic from the collection of MHHS consumption data, it is difficult to determine the impact, therefore it is difficult to determine if this modification better facilitates the SEC objectives.	The DCC has discussed this with its Service Providers and consider that the MHHS impact will be covered, based on the current MHHS assumptions.
OVO Energy	Large Supplier	Yes	The costs' which have reduced considerably are still not insubstantial and will have an impact to us. Noting that it is still very unclear how visible these costs will be to us and that the DCC has not yet included them in any of their Cost consultations for DCC Charges. We will be impacted as an Export Supplier as the scheduling windows have changed those which we'd not seen any reason for doing.	
Smart DCC	DCC	Yes	DCC will work with its service providers to implement the required changes for MP162.	
Electricity North West Limited	Network Party	Yes	MP162 as drafted does not directly impact Network Operators but will have a whole system impact across DCC, DSP and CSP services of multiple parties attempting to retrieve consumption data from a consumer's smart meter – Our concern remains that this increased volume of traffic will cause further service degradation in CSP service performance for SEC Users.	The implementation of the Northbound Prioritisation approach should mitigate the risk of increased Install & Commission (I&C) times.

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita Energy Limited	Large Supplier	Yes	If there are large traffic spikes which are not managed, our BAU activities would be negatively impacted. Contact to our call centres would increase and need to be managed. It could also lead to increased I&C times if there were delays to processing traffic. Our response is only considering MP162, it does not consider the wider impacts of MHHS.	
IMServ Europe Ltd	Other SEC Party	Yes	IMServ intends to become an independent MDR	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	Yes	We will all seek to become MDRs.	
Western Power Distribution	Network Party	No	We don't believe that there will be any direct impact as a result of MP162, however there could be an indirect impact as a result of a potential consequential change as mentioned under Q3, as well as potential performance issues.	
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 MHHS and MDR opportunities –	

Question 5				
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			i.e. is this role (and the associated infrastructure) something we would build in house, or outsource, or a combination of the two.	

Question 6: Will your organisation incur any costs in implementing MP162?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	-	
OVO Energy	Large Supplier	Yes	As already detailed, no savings will be made in the implementation of this Mod as all the costs are borne by us. We will be paying for another Role to carry out the duties we can do already and then to improve the ability of the DCC to handle data for them and us, even though we could do this today and DCC would need to handle it anyway.	
Smart DCC	DCC	More than £1m	DCC revised MP162 costs are detailed with in Annex B, which will be implemented through the fixed charging element of SEC Section K.	
Electricity North West Limited	Network Party	Yes	It is difficult to see how this proposal will not eventually result in costs for DNOs and their customers by having to modify their DCC interface and data handling systems in response to traffic management constraints.	
Utilita Energy Limited	Large Supplier	More than £1m	Most of the costs associated with the total MHHS programme will arise as DCDA and wholesale costs. We have included these in this iteration of our response, as	

Question 6				
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			well as our central costs for this modification. We will also incur DBT costs associated with our CSS systems to facilitate MHHS.	
IMServ Europe Ltd	Other SEC Party	£100k-£250k	This is an estimate the cost of connecting to the DCC, going through testing, etc to become an MDR. Ongoing operating costs are unknown at this stage.	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	£250k-£500k	This will vary between organisations represented in this response; however, costs would include DCC Adapter development (if required), Security assessments, user entry process testing, qualification management etc.	
Western Power Distribution	Network Party	No costs	We don't believe that there will be any costs as a result of MP162, however there could be an indirect cost as a result of a potential consequential change as mentioned under Q3.	
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 MHHS and MDR opportunities. (See above answer to Question 5)	

Question 7: How long from the point of approval would your organisation need to implement MP162?

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	-	
OVO Energy	Large Supplier	Not long	It is as yet undecided if we will need to schedule SRV4.2 that would require a DUIS uplift, but, without that, it is understanding the impact of having to schedule the Export element. We'd need to understand more how this will work, and why, to work out how long it will take to achieve. We don not envision this to be a long development window though. We are conscious of any other changes that come along and the unknown impact of them. It's clear there is still a considerable disjoint in how the MHHS Programme understand how Smart works and would like settlement to operate. This is creating confusion as there are many assumptions in the design that need working out.	
Smart DCC	DCC	-	DCC will deliver the modification in line with the approved timeline.	

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Electricity North West Limited	Network Party	-	See our response to Q4	
Utilita Energy Limited	Large Supplier	-	February 2024 SEC Release provides enough time for Utilita to make any require changes.	
IMServ Europe Ltd	Other SEC Party	6 months	Based on previous experience from being an RSA and OU role user	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	6-8 months	This will depend on how long it takes to complete UEPT as an MDR.	
Western Power Distribution	Network Party	-	We don't believe that there will be any lead time required, unless there is a consequential change as referred to in Q3 which may require a 12 month lead time from the point of approval of that specific modification/change proposal.	
British Gas	Large Supplier	-	Not yet known.	

Question 8: Do you believe that MP162 would better facilitate the General SEC Objectives?

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	Yes	On balance yes, we do believe it will better facilitate the SEC objectives, noting our comments on Q5 that we don't know the whole system impacts and if this adversely impacts the performance and service DCC Users currently enjoy.	
OVO Energy	Large Supplier	Partially	We believe MP162 facilitates SEC Objective's (b) and (g). SEC objective (c) can be achieve today without this Mod. The ability for a Supplier to obtain HH profile data and submit it into settlements can take place already. This Mod is not changing that for us at all.	
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.	

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			• 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	Yes	For the very narrow scope of this modification. See our responses to Q1 and Q6	
Utilita Energy Limited	Large Supplier	-	-	
IMServ Europe Ltd	Other SEC Party	No	The solution as proposed fails to facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy, objective (d). It would distort the market in favour of those energy suppliers who collect HH data in house using the peak window vs those suppliers who engage with MHHS data using independent MDRs. It also goes against the objective of the SEC Panel: "the SEC Panel is responsible for managing the Smart Energy Code (SEC). Its prime objectives are to ensure that the SEC is managed in a way that is efficient, fair, and does not discriminate between Parties or classes of Parties."	Please see the response to question 1 above.
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	Yes	We have provided a response to this question in the previous consultation, which was contingent upon the competition issues identified being addressed.	

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes	We agree that this modification would better facilitate SEC Objective (b).	
British Gas	Large Supplier	Yes	We agree with the Proposer's views that this will better facilitate Objectives (b), (c) and (g).	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP162 is implemented?

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	-	
OVO Energy	Large Supplier	Yes	As responded to previously, the costs of this change, noting there is very little in this Mod that will benefit a Supplier User using the DCC Services, will impact us and our end customers. Who should be the key focus in all this but are not mentioned at all. As such there is no benefit to consumers other than a likely increase in bills to recover the increased DCC costs for this. They can be settled today on a HH basis and will still be billed the same with or without HHS.	
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.	

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Electricity North West Limited	Network Party	Yes	Yes (in terms of impacts) See our response to Q6.	
Utilita Energy Limited	Large Supplier	No	There will be no specific benefit to consumers from this modification.	
IMServ Europe Ltd	Other SEC Party	Yes	MHHS is a benefit to consumers overall as it facilitate a more flexible energy system.	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	Yes	We have provided a respond to this question in the previous consultation, which was contingent upon the competition issues identified being addressed and restrictions on usage of data collected by the MDR being removed.	
Western Power Distribution	Network Party	Yes	Based on Ofgem's prediction, consumers would benefit.	
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 specific benefit to consumers of the introduction of the MDR user role, which is at the core of MP162. Suppliers can already access this data, and it will depend on the market development of the MDR industry as to whether this new role does bring net value to consumers.	Please see the response to question 1 above.

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			We see absolutely no benefit to consumers of the proposed timing clash between MP162 being implemented, and the new DSP being put in place just 6 months later (and having to again build/test/implement the MP162 delivery platform). Instead, we think this will add an extra £10m+ to consumer bills. This timing clash needs to be flagged urgently with Ofgem – as it seems completely inappropriate at this time of unprecedented Energy Bills and Cost of Living increases.	

Question 10: Noting the costs and benefits of this modification, do you believe MP162 should be approved?

Question 10				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	-	
OVO Energy	Large Supplier	No	As a Supplier, there are no benefits listed, other than mitigations if others carry out the functions. That is not a benefit to us though, that is just ensuring we can continue to operate as if this Mod was not implemented. We fully support the need to get as much data into settlements as possible and moving to a half hourly regime makes perfect sense to do so. The ability to link the settlement data to charging regimes sent out by the Networks is hugely beneficial to us and customers but this Mod is not achieving any of that. The costs, although far lower and more sensible, are still incredibly high for functions that can be done today by us in our current Roles except that of Export Supplier. We're still concerned many items under discussion for MHHS are not yet included. We would like to see the overall cost impact to us in our DCC Charges and would like to	

Question 10				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			understand how that can be achieved. Also how the costs will be shared across other SEC Party's.	
Smart DCC	DCC	Yes	Consumer benefit as noted in response to question 9, plus wider obligations on all MHHS Parties to implement this Ofgem sponsored programme.	
Electricity North West Limited	Network Party	Yes	We support the design, development and delivery of the MHHS programme. It is vital that the DCC address the wider capacity issues so as to ensure that the MHHS solution and wider smart metering works. We recommend a risk be raised under the MHHS programmes regarding the wider capacity issues for the DCC MHHS solution.	
Utilita Energy Limited	Large Supplier	No	Noting our concerns raised in response to Q1, we cannot approve the modification as proposed. Despite the reduction in total cost, industry's concerns around cost recovery remain unanswered. We're also not sure whether the new User role is necessary.	
IMServ Europe Ltd	Other SEC Party	No	The competition issues inherent to the proposed solution are serious and need to be addressed.	Please see the response to question 1 above.
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	No	We are in the difficult position of fundamentally disagreeing with much of the proposed solution but not wanting to delay the overall MHHS timeline. Follow-up mods to address flaws in this one will be expensive and inefficient. It would be much better to get it right first time with a solution that is workable for all parties. If the DCC	Please see the response to IMServ for question 1 above.

Question 10				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			can devise a way to manage TPS without discrimination and allow the MDR to access the same TRTs as the supplier then we would support approval of MP162.	
Western Power Distribution	Network Party	-	We would like to better understand how the revised costs of £9m with an annual support cost of £2.3m has been accounted for within the MHHS Programme business case, especially given that this is so different to the costs provided under the PIA.	We will ask the MHHS Programme to provide a view on this.
British Gas	Large Supplier	No	We do not think MP162 should be approved yet, until the clash with the timing of the new DSP appointment is resolved. We also consider that the extra questions (1-5) we raise in our answer to Question 2 need to be answered before Change Board can make a fully informed decision.	Please see the response to questions 1 and 2 above.

Question 11: Please provide any further comments you may have

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
Scottish and Southern Electricity Networks	Network Party	-	
OVO Energy	Large Supplier	-	
Smart DCC	DCC	-	
Electricity North West Limited	Network Party	Electricity North West remains of the opinion that the likely 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. We recommend this option be investigated further as part of the DCCs wider work on capacity issue.	A caching solution for Smart Metering Equipment Technical Specifications (SMETS) 1 Devices has been included in the DCC's solution. The SEC security framework means a similar approach is not permissible for SMETS2+ Devices, and so this option was not pursued under MP162. We will pass your request for this to be investigated further as part of the wider capacity work to the DCC.
Utilita Energy Limited	Large Supplier	At 4.4 Northbound Prioritisation within the DCC Impact Assessment, the DCC make note of capturing 2 additional Business Requirements regarding Northbound Prioritisation for inclusion within the Business Requirements. These have not been captured in the most recent Business Requirements document v0.6.	We will review and update the business requirements document.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
IMServ Europe Ltd	Other SEC Party	-	
Association of Independent Meter and Data Agents (AIMDA)[2]	Other SEC Party	We have commented on this Mod and the competition issues it introduces extensively – both as a group and individually. As the intended users of the MDR role, it feels like we have no influence on how it is specified. We would welcome stronger commitments form SEC/DCC that the MHHSP design-principle of a level-playing field will be implemented. At the moment, it is far from level.	Please see the response to IMServ on question 1 above.
Western Power Distribution	Network Party	We note that there was concern from a TABASC member that although SMETS meters are designed to record the consumption in each half-hour period, they had not been designed to be half-hourly meters and therefore we seek assurance that meters will be fit for purpose, continue to operate and not be negatively impacted but this new requirement. With regards to the cache option under S1SPs, would this data be made available to any party that was requesting it and not just the MDR/Supplier, i.e. would DNO's request for that data come from the stored data too? We also note that there have been some discussions around how this modification is paid for. Whilst we understand that this is likely not relevant at this time as the SEC Modification process is defined and time is of the essence, we question whether modification costs should be reviewed in relation to how it is identified who should pay for them on a more enduring basis.	On the SMETS1 caching option, this information would be available to any User, including Network Parties, that subsequently requests the same date. Whilst the DCC agrees that not all meters are 'half-hourly meters' they will be able to support half-hourly settlement.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
British Gas	Large Supplier	Concern over volume assumptions We are worried about the volume assumptions, if the anticipated volumes used to underpin the FIA turn out to be too low, versus what actually happens once MHHS launches. Page 2 of the MP162 modification report states: "*The DCC technical solution is well defined and has now undergone the full DCC Impact Assessment, which is included in this consultation.*" This sounds positive. However, section 3.4 (Update from PIA Response) in the DCC FIA says: "*As part of the PIA Response, DCC noted that there were several key points that created a level of uncertainty which heavily influenced the variable ROM costs. DCC further noted that resolving these in a clear and unambiguous manner should significantly reduce solution costs as part of any requested FIA and maximise the value of the FIA.* *DCC is happy to report that with the support of the Working Group, DCC has managed to reduce the level of ambiguity in the key areas noted within the PIA, by proposing a more complete set of anticipated User behaviours and key volumetric assumptions as well as a firmer DCC System end-to-end (E2E) solution design using these, that the FIA proposed DCC solution has been designed against.* *This has resulted in reduced solution costs as anticipated, but has meant that the proposed DCC solution is now more sensitive to any future changes to the documented anticipated User behaviours and*	We will review and clarify the statements over volume assumptions for the final Modification Report. The DCC has validated the assumptions and design principles as far as it can, and these have been approved by the Working Group. The build costs will remain the same (unless there is a change raised before implementation) but running costs could increase or decrease based on patterns of use. Please also see the response to questions 1 and 2 above.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
		key volumetric assumptions and this should be noted by Industry." This sounds much less confident. There is a lot of uncertainty over how MHHS will be used by industry as it opens up the opportunity for new tariff propositions and operations. However, the FIA is saying it has reduced the ambiguity, and now has lower solution costs, but these will only apply if the demand volumes exactly follow those forecast (which is impossible to forecast). I read this as meaning that the build isn't that flexible at remaining optimised at different volume levels, and costs could well end up a lot higher than the £9.3m being forecast. This needs to be made really clear in the final modification report for MP162, so those making decisions are fully aware of the risk here. Please also see our additional questions (1-5) that we think need to be addressed in our answer to Question 2. <u>Concern over timing clash with the re-procurement of the DSP contract</u> We are concerned that consumers may end up paying twice for the build. DCC are reprocuring the DSP (Data Service Provider), currently managed by CGI. CGI's contract expires just after MHHS goes live, meaning the old DSP has to make system changes and the new DSP will also include in its design, ultimately costing the consumer money.	

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
		All the industry parties (including us as a Large Supplier, plus whoever we use as MDR) will also have to test twice. We estimate this is at least £10m of avoidable cost. The current DCC IA assumes it will be in the February 2024 release under the current DSP (CGI). The New DSP go live October 2024.	