MP169 'Managing the Consumer's refusal of a Smart Meter'

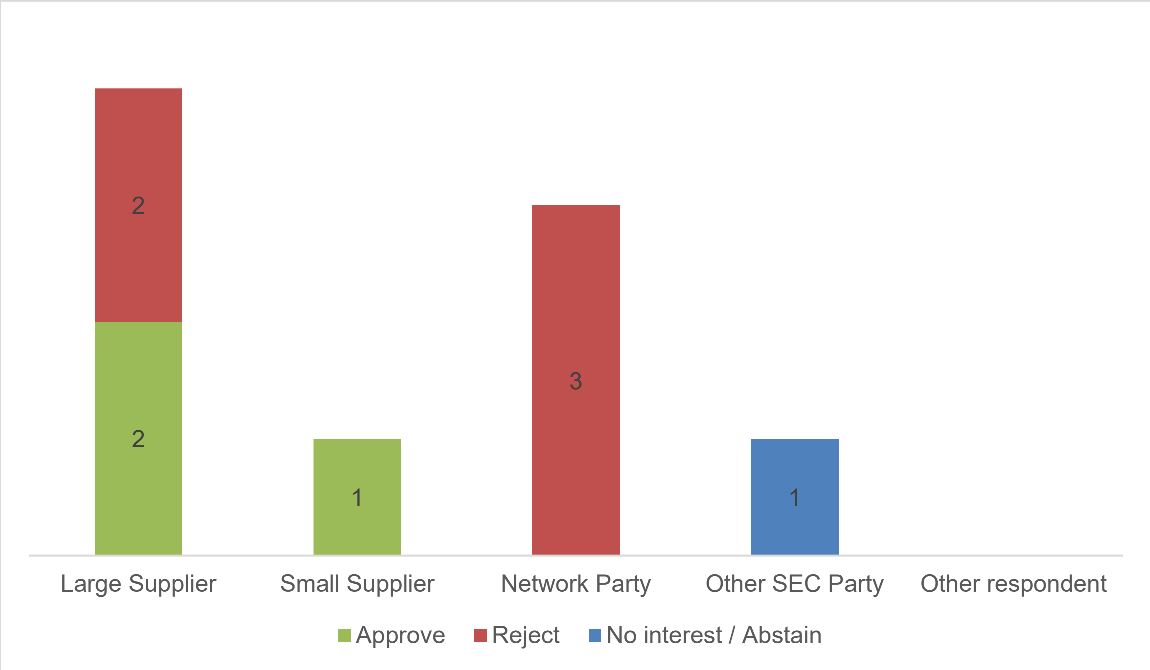
Annex J

Refinement Consultation responses

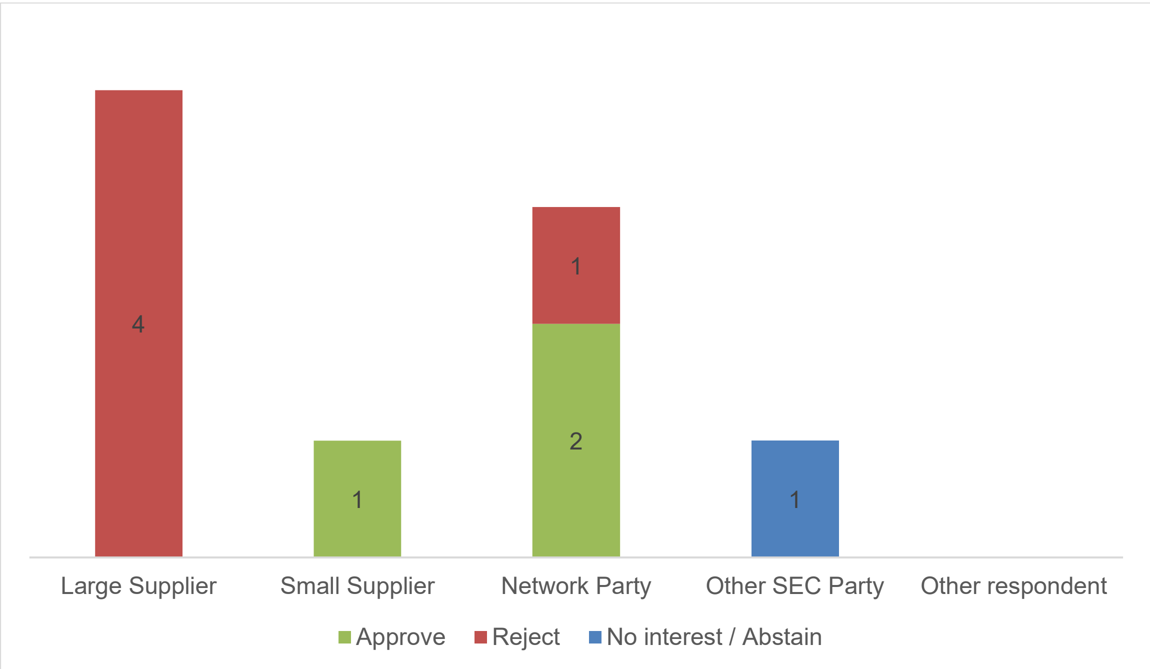
About this document

This document contains the full non-confidential collated responses received to the MP169 Second Refinement Consultation.

Summary of responses for Solution Option 1b



Summary of responses for Solution Option 2



Refinement Consultation

SECAS received nine responses to the Modification Report Consultation.

None of the respondents believed that Solution Option 1a should be approved due to cost and lack of benefits.

Three respondents Two Large Suppliers and a Small Supplier) believed that Solution Option 1b of the modification should be approved, and five (Three Network Parties and 2 Large Suppliers) believed that it should be rejected. Those that felt it should be rejected believed that the cost was too high and implementation would undermine the benefits of the smart metering programme. The Small Supplier that believed it should be approved, did so only on the grounds than it was not as expensive as Option 1b. Several respondents highlighted that none of the Solution Options fully addressed the problem as the meters would still be communicating to some degree.

Three respondents (One Small Supplier and Two Network Parties) believed that Solution Option 2 of the modification should be approved, and five (One Network Party and all four Large Suppliers) believed that it should be rejected. The Large Suppliers stated that there would be significant system impacts for them to change their processes and manage the information, in addition one large Supplier noted that there may be a competition aspect to Large Suppliers being unable to access the information but other Parties being able to access the data, potentially without the consumer's consent.

Question 1: Do you agree that the DCC System Solution offered by Solution Options 1a and 1b will effectively resolve the identified issue?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	The solution doesn't address customer concerns where the customer still does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not.
EDF	Large Supplier	Partly	EDF's position on the matter of which metering type to install at a customer's premises has not changed throughout the duration of this modification; Smart meters are a key enabler for the net zero transition and the Clean Power 2023 Mission and provide clear benefits to consumers as well as the wider energy system. If Government targets on net zero are to be achieved, all technologies (including smart meters) that support them need to be promoted and not restricted in any way that will undermine their contribution to net zero. It makes no sense to invest in the cost of installing a smart meter if a customer can then, on request, eliminate the value of that investment by requiring the meter to be operated in a manner that removes the very purpose for which that meter was designed; Billing and Settlement. EDF, like most suppliers, has always set out its requirements and conditions for providing a supply to a customer and these have always included our expectations with regard to metering. We have always reserved the contractual right, and continue to do so, to install whatever meter we consider most appropriate – including smart metering. We do not accept nor agree that smart meters create additional data privacy concerns. Suppliers have always been able to collect the data measured by their metering equipment, and the fact that this can now be collected remotely and at more frequent intervals does not create a privacy issue. Allowing Customers to be able to refuse a supplier from collecting such data at a minimum of monthly intervals would actually be more restrictive than what has existed and taken place over the last 50 years without any complaint or challenge. Rather than introduce new processes that restrict the value to be gained from smart meters, all suppliers should be promoting the take up of smart

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			enabled meters in smart mode. Having said that, we recognise that to manage customer experience at the moment many suppliers are introducing workarounds – either leaving meters uncommissioned or worse still without comms hubs installed. This is the height of insanity, and so any measure that reduces the need for this and introduces greater MP169 Second Refinement Consultation Page 6 of 18 This document has a Classification of White Question 1 Do you agree that the DCC System Solution offered by Solution Options 1a and 1b will effectively resolve the identified issue? Please provide your rationale. consistency across the industry is one that we will support – even though we recognise facilitating a 'restricted' mode, will undermine the value of smart metering, restrict innovation, delay the achievement of net zero and possible create, rather than remove, legal hurdles on data privacy. However, we would like to make it clear that notwithstanding the availability of this new facilitated restricted mode, we remain of the clear view that the ultimate decision on determining when the restricted mode should or should not be applied must be for the supplier alone, who will no doubt wish to set out the circumstances in which they are or are not willing to implement that mode. This is not for the customer to determine, but for the supplier to determine solely with regard to managing customer expectation and experience and when it is appropriate to do so. Industry data suggests only 3-4% of customers state data privacy as a reason for not wanting a smart meter. It should also be noted that of the 3-4% a good proportion will be prepayment customers that will not be eligible for a restricted flag on their meter. The proportion of customers impacted and resolved by the DCC System Solution offered by Solution Options 1a and 1b is very small. However, as consumers can block access to prevent the installation of a new smart meter or try to request the replacement of existing smart meter with legacy metering, we agree the consistent application of the DCC System Solution offered by Solution Options 1a and 1b might help standardise and improve the processes for Suppliers and consumers. This can only work with consistent and standardised messaging from the Ombudsman, Citizen's Advice and Ofgem and seen as a last resort alternative to the removal of a working smart meter. Consideration also needs to be given to the option of NOT implementing any option provided. Does the benefit of solving the problem for a small number of

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			vocal consumers really outweigh the costs to industry? Is the solution suitable to solve an appropriate number of unhappy consumers?
E.ON Next	Large Supplier	No	Solution Options 1a and 1b do not effectively resolve the identified issue of customers not wanting a smart meter. The Options attempt to provide a mechanism for Suppliers, bound by their Supply Licence conditions and Smart Energy Code obligations, to partially respond to a consumer's request not to have a smart meter, using the available smart meter devices but reducing functionality as much as is technically possible without impeding critical and secure operationability necessary to service the customer. Solution Options 1a and 1b only applies to credit meters so does not cover all consumer types, ie., prepayment.
Utilita	Large Supplier	No	The proposed solutions do not resolve the issue –a customer does not want a Smart meter on their premises. The proposed solution goes against this by installing a Smart meter. The proposed solutions would only meet the needs of customers who refuses a smart meter because they have issues with the communication of data, which does not reflect the reality of the situation. There are no longer non-smart meters being manufactured. Customers have the right to object to the installation of a smart meter. This modification was raised to bridge that gap – to allows for meters to be installed using the only metering equipment which is still manufactured. We do not believe that the proposed solutions are successful in bridging that gap. Ofgem must recognise that the messaging must now change. Smart meter installations should be made mandatory. This would reinforce DESNZ's stated goal of 100% smart metering conversation, as stated in their recent post 2025 framework consultation.
ENGIE	Small Supplier	No	We do not support either of these options on the grounds of cost and believe that Option 2 is a more cost-effective solution, at least initially while the scale of the issue is determined.
UKPN	Network Party	No	UK Power Networks does not consider this the most effective solution. While individual consumers may opt out of data collection, aggregated consumption data is essential for network benefits. Adopting Option 1a or 1b would reduce the accuracy and effectiveness of our network management and low

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			voltage utilisation, ultimately diminishing the advantages gained from Smart Meters. Therefore, we do not believe these options effectively address the issue in the most effective way for the network.
NGED	Network Party	No	Whilst we accept that there is currently a contradiction between the SEC and Licence Conditions, and the position of Government stating that there should be no obligation to have a smart meter installed, for an issue that may only be affecting a minority of consumers, this appears to be a complicated and expensive solution that does not fully resolve the issue and would have an adverse effect on the dayto-day operations of Network Operators. 1. It seems unproductive, inefficient and counterintuitive to fit a Smart Meter and then restrict its usage. The overall cost of this solution aside, the cost of fitting a Smart Meter for it then to be restricted means that there is minimal cost benefit in doing so. We would question why a traditional meter could not be left in place for the potentially small number of consumers that do not wish to share their data, as per the perspective of DESNZ being “that consumers have a choice whether or not to have Smart Meters”, a view that we would share. 2. As we understand it, this modification would only apply to credit meters. Therefore, the main issue of the contradiction as detailed above would continue to exist for a large proportion of consumers, despite the proposed costly solution. 3. As per the Modification Report (v 0.10), during the RFI, Network Operators expressed concerns regarding the Service Requests included in the ‘Allowed/Disallowed’ List. The SRs listed in the Mod Report as being of concern are still showing in the ‘Disallowed when Restricted’ List in Annex E. Our enduring stance is that we require access to these SRVs in order to ensure continued reliable and efficient network operations, so we cannot agree to a solution that does not allow Network Operators to have access to these SRVS. It is also imperative that we do not lose access to the Alerts mentioned in the Mod Report, as these relate to our ability as a Network to provide, protect and safeguard a stable power supply for consumers. We have been unable to locate a list of Allowed/Disallowed Alerts when Restricted so would be grateful if these could be clarified.
ENW	Network Party	Yes	It blocks the pre-determined disallowed SRVs and alerts from being sent to/from the device, therefore fulfils the consumer request.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
AltHAN Co	Other SEC Party	No comment	n/a

Question 2: Do you agree that the legal text in Annex G will deliver the DCC System Solution Options?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	See Question 1 above.
EDF	Large Supplier	Partly	Section H18.1 states: Where the Energy Consumer for that Smart Metering System has informed the responsible Supplier, they wish for their Device to have the Restricted Attribute made active, the Supplier shall inform the DCC to set the Restricted Attribute to True in the Smart Metering Inventory.' This statement implies that the customer can choose restricted mode. EDF expects that Suppliers should be the decision make and set their own controls for restricted mode. It should not be considered an obligation on suppliers at the behest of consumers. Additionally, H18.5 states: 'Where a User becomes aware that a Change of Tenancy has occurred, they shall make the DCC aware as soon as practically possible.' Again, EDF do not expect that this process should be an obligation. A change of Tenancy will usually require a new contract and will likely lead to the removal of the restricted flag, but there is no reason why this should become an obligation – Suppliers are likely to be monitored closely on the use of the flag and that should be sufficient to ensure its proper use.

Question 2			
Respondent	**Category**	**Response**	**Rationale**
E.ON Next	Large Supplier	No	Clause H18.2 appears to stop mid sentence. Is there a definition for True? Should there be a definition for false?
Utilita	Large Supplier	Yes	The legal text as drafted will deliver the solution outlined.
ENGIE	Small Supplier	Yes	No comment.
UKPN	Network Party	Yes	Whilst UK Power Networks do not agree with the solution, we do believe the legal text in Annex G would deliver the solution option
NGED	Network Party	No	H18.1 – Define how the consumer should inform their supplier. Is there a stipulation on the method of contact to be used (i.e email/phone call/form) and whether evidence of this request is required and if so, what evidence? H18.2 – The wording may need amending here to clarify exactly what the obligation is stating. H18.4 – Should be confirmed that the OPSG shall also manage The Restricted Attribute Disallowed List if these are to be maintained as two separate lists. H18.5 – Should there be an SLA on this, to ensure data is not being restricted unnecessarily? If not an SLA, an obligation of some kind or specified/maximum timeframe, rather than 'as soon as practically possible' which is quite vague.
ENW	Network Party	Yes	-
AltHAN Co	Other SEC Party	No comment	n/a

Question 3: Do you agree with the proposed implementation approach for Solution Option 1a and 1b?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	The solution doesn't address customer concerns where the customer still does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not.
EDF	Large Supplier	Yes	Yes, we agree with the proposed implementation approach for Solution Option 1a and 1b. Clearly Option 1b cannot be implemented into the new DSP until it is delivered and working
E.ON Next	Large Supplier	No	Due to the limited benefit of introducing Solution Option 1a with the pending introduction of DSP2, we believe that only Option 1b should be implemented to minimise continuance of potential non compliance which the Suppliers currently find themselves in due to no fault of their own. For the reasons already given we do not believe there is any benefit in introducing Solution 1a.
Utilita	Large Supplier	Yes	If this option were to be implemented, the given dates make sense.
ENGIE	Small Supplier	Yes	We understand the two alternative implementation approaches, although we do not support these options.
UKPN	Network Party	No	UK Power Networks does not consider either of these options to be the most effective solutions for addressing the identified issue. Furthermore, the implementation timeline is estimated at a minimum of one year for Option 1a and several years for Option 1b. In contrast, we believe that Option 2 represents the optimal approach, as it can be implemented immediately and is therefore better suited to providing a prompt and effective resolution.
NGED	Network Party	No	Either option would consist of a lengthy implementation timeframe which we do not feel is justified given that we feel the solution does not fully resolve the identified issue and would have a negative effect on network operations going forward. (Please see our response to Q1.)

Question 3			
Respondent	**Category**	**Response**	**Rationale**
ENW	Network Party	-	From a DNO perspective we have no direct influence on this, purely just to update our systems/avoid tapping that device for data, but I can see potential pitfalls for suppliers when creating process to cover each scenario type to apply the restriction flag. It depends partially on the expected volume of consumers likely to request this; small volumes would have a negligible impact, be easier to track and remove/reapply where required but if it spills into millions of individuals its likely to have consequences such as meter points remaining restricted. Without specific FMS request, there is a high propensity for sites to remain with the tag even if that particular consumer has moved on. It would make more sense for the flag to drop off at any change of status with impetus on the consumer to request re-application at that stage.
AltHAN Co	Other SEC Party	No comment	n/a

Question 4: Will there be any impact on your organisation to implement Solution Option 1a or 1b?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	Yes - significant	We would need to introduce new processes for recording and managing the Restricted Flag consent, including around any Change of Supplier and Change of Tenancy processes. We would need to implement changes in a wide number of existing systems, including: - Impact on Billing – recognising when no read is due to Restricted Flag

Question 4			
Respondent	**Category**	**Response**	**Rationale**
			- Impact on MHHS – recognising when no read is due to Restricted Flag - Impact on new Smart GSOP management systems, which are already in development Interaction with import/export tariffs that need an active smart meter for eligibility
EDF	Large Supplier	Yes	EDF will need to develop systems, processes, reporting and controls that support the implementation of the restricted flag. Customer Service teams will need to be able to recognise when customers are in such a restricted status and understand the implications. Customer Accounts will need to be easily identified. Communications to customers will need to be developed so that they know what the implications of the restricted mode are and what they will be required to do if the want accurate bills. They will also need to be told how to get the flag removed.
E.ON Next	Large Supplier	Yes	The implementation of Solutions Options 1a or/and 1b will mean operational changes to be made to current processes which will need to be implemented to update the Smart Metering Inventory (SMI) based upon the customer requesting that a smart meter not be installed (and when they request that restricted attributes be removed enabling full smart functionality). The operational changes would include staff training - customer service, smart meter installers, etc, and consumer communication.
Utilita	Large Supplier	Yes	We would require a new policy and process to manage this, as well as to update our training and user guides for operational, field services and call centre staff. There would also be system changes to handle the new Error Response Code and Warning Response Code, as well as handle the additional data pulled as part of SRV 8.2 for these sites.
ENGIE	Small Supplier	Yes	Staff and agents would need to be trained on the use of the Restricted flag, and there may need to be system updates to enable the flag to be applied.
UKPN	Network Party	Yes	The proposed implementation would have negative implications for UK Power Networks and all Network Parties. In particular, it would reduce accuracy of aggregated smart meter data, thereby limiting our visibility of the network loading. Ensuring the accuracy of aggregated data is key to

Question 4			
Respondent	**Category**	**Response**	**Rationale**
			mitigating the risk of over/under investment in network reinforcement, and to aligning with long-term strategic planning goals. Additionally, technical changes to our Meter Data Management Systems (MDMS) would be required to accommodate this change.
NGED	Network Party	Yes	In the short term, our internal processes will need to be amended to manage the use of a restricted attribute. I.e ensuring that the flag is apparent/visibly clear in order to ensure that disallowed SRVs are not sent. We would also need to update our systems to ensure any returned error reports can be accepted in the event of sending a disallowed SRV. In addition, we would need to create and introduce a process of separating the reporting of non-communicating devices due to a fault from those that are non-communicating due to customer choice. In the long term, if the 'Allowed/Disallowed when Restricted' Lists remain as they are currently showing in v0.1 of the 'Service Reference Variants Allowed/Disallowed for all Solution Options', this could have a detrimental effect on our ability as a Network Operator to maintain an accurate overview of consumption across our network. Being able to continually analyse this data set is essential, and a vital quality of Smart Meters in general, with the granular energy consumption data that Smart Meters record being a key enabler of large-scale demand shifting for more efficient usage.
ENW	Network Party	Yes	Likelihood of costs to update adapter software to ingest the new messages and be able to flag the devices internally to prevent unnecessary targeting of these devices
AltHAN Co	Other SEC Party	No comment	n/a

Question 5: Will your organisation incur any costs in implementing Solution Option 1a or 1b?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	£500k or more costs, £0 savings	We estimate the cost of implementing Solution Option 1a to be £3 million to £5 million. We estimate the cost of implementing Solution Option 1b to be £2 million to £4 million. The Solution Option 1a cost is higher, because of our non-domestic CRM migration programme, which means the changes to meet the time frame for Option 1a would need to be installed in both our old and new non-domestic systems. The implementation cost would be lower if the Restricted Attribute was only required for domestic customers, not non-domestic customers (£1 million to £2 million). We would also have significant ongoing costs to manage the various exceptions and tasks outlined in our answer to Question 4. We don't have an estimate for this. Any cost savings (from dealing with Ombudsman referrals for example) would be minimal in relation to the expected new costs.
EDF	Large Supplier	£50,000-£249,000 costs	Unknown at this stage – However we have procured IT service contracts that will develop the minimum capability to manage the solution. Other costs will be non-IT and mainly resource costs and project management.
E.ON Next	Large Supplier	n/a	n/a
Utilita	Large Supplier	Costs £50,000-£249,000, £0 cost savings	This is an estimate of the costs required to implement the policy, process and training changes previously outlined, as well as development work required for the system changes.

Question 5			
Respondent	**Category**	**Response**	**Rationale**
ENGIE	Small Supplier	£1-£49,999 costs,	We expect the costs of implementation to be low.
UKPN	Network Party	£250,000-£499,999 costs, £0 savings	Required changes to our MDMS would result in costs between £250-500k. Additionally, we believe benefits would be negatively impacted as well as zero cost savings for us.
NGED	Network Party	-	This is unknown at this stage and would require further investigation.
ENW	Network Party	£1-£49,999 costs, £0 savings	We would need to update our adapter to ingest the new alerts plus create an identifier to flag on the system so we know to avoid attempts to obtain disallowed data types. None of this creates a cost saving for us.
AltHAN Co	Other SEC Party	No comment	n/a

Question 6: How long from the point of approval would your organisation need to implement MP169 if Solution option 1a or 1b were approved?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	18-24 months	6-12 month delivery time, but would not be able to start for 12 months, due to other regulatory priorities already in the development backlog (MHHS, Smart GSOP etc).
EDF	Large Supplier	-	This would need to be confirmed by our Software as a service provider. We would expect a lead time of around 9 months
E.ON Next	Large Supplier	-	Approx three months or more
Utilita	Large Supplier	6-12 months	We would need to raise work orders and have the change assessed and prioritised, then stand up development resource to work on this in addition to writing new policy documents, revising training etc.
ENGIE	Small Supplier	6 months	To allow time for staff training and implementation of the API.
UKPN	Network Party	3-6 months	Due to technical system changes and the required change process, we would require between three and six months to implement these changes.
NGED	Network Party	-	This is unknown at this stage and would require further investigation.
ENW	Network Party	6-12 months	Would need to raise request for internal mapping of new messages to relevant systems plus new feature implementation to tag the devices on adapter so can be tracked/removed easily from any consumption/voltage requests.
AltHAN Co	Other SEC Party	No comment	n/a

Question 7: Do you believe that the DCC System Solution Options (1a and 1b) would better facilitate the General SEC Objectives?

Question 7			
Respondent	**Category**	**Response**	**SEC Objective(s)**
British Gas	Large Supplier	-	Positive: (f) Neutral: (b), (d), (h) Negative: (a), (c), (e), (g)
EDF	Large Supplier	-	Positive: (a), (b) Neutral:(c), (d), (e), (f), (g) Negative: (h)
E.ON Next	Large Supplier	-	Positive: Neutral: (b), (d), (f), (h) Negative: (a), (c), (e), (g)
ENGIE	Small Supplier	-	Positive: Neutral: (b), (c), (d), (e), (f), (g), (h) Negative: (a),
UKPN	Network Party	-	Positive: (f) Neutral: (b), (c), (d), (g), (h) Negative: (a), (e),
NGED	Network Party	-	Positive: Neutral: (b), (c), (d), (f), (g), (h)

Question 7			
Respondent	**Category**	**Response**	**SEC Objective(s)**
			Negative: (a), (e)
ENW	Network Party	-	Positive: (c) Neutral: (b), (d), (g), (h) Negative: (a), (e), (f)
AltHAN Co	Other SEC Party	-	Positive: Neutral: (h) Negative:

Question 8: Do you believe there will be any impacts on or benefits to consumers if Solution Option 1a or 1b for MP169 is implemented?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No (negative impact)	For a very small handful of consumers, this would allow them to request a smart meter operating in Restricted Mode. However, this solution doesn't address customer concerns where a customer does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not. For the remaining 95%+ (or 99%+) customers, the industry would incur significant extra costs, resulting in higher bills.

Question 8			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	Implementing the solution sooner would provide clarity to those consumers requesting a restriction to access to their smart meter. However, there is a clear correlation between the cost of development and its timebound opportunity for benefits realisation. We must consider this question against the decision to proceed early
E.ON Next	Large Supplier	Yes	Implementation of Solution 1a or 1b will impact the consumer as the DCC's cost of implementation is significant which may be passed onto the consumer in future energy costs billed. Implementation of Solution 1a or 1b will not fully address consumers' request not to have a smart meter installed. Implementation of Solution 1a or 1b does not support Smart meter device rollout.
Utilita	Large Supplier	Yes	For customers who are concerned about their energy supplier having access to their consumption data, this modification would have positive benefits. There will be no impacts on other customers.
ENGIE	Small Supplier	Yes	If either solution is implemented consumers who do not want Smart functionality will be able to have a restricted SMETS2 meter installed as a replacement for an ageing traditional meter, which will ensure their metering equipment remains fit for purpose and safe. However, while these solutions would deliver the benefit, they would not do so in the most cost-effective manner. There is also a risk that an expensive solution is put in place, but is still rejected by consumers as they either simply do not want a Smart meter, even if it is restricted, or do not trust that the supplier will apply the restriction correctly
UKPN	Network Party	Yes	UK Power Networks' understanding is that consumers who opt not to share their consumption data with their supplier may be adversely affected by this decision, as they could become ineligible for specific tariffs that require consumption data to be provided. Consequently, these consumers may receive different treatment from their supplier compared to others and potentially incur higher costs for the same level of electricity usage. It will be the responsibility of suppliers to ensure that consumers are appropriately informed about the potential implications of withholding their consumption data. If implemented, Option 1a or 1b could negatively affect the accuracy of Smart Meter data, which Network Parties are increasingly utilising to inform key decisions

Question 8			
Respondent	**Category**	**Response**	**Rationale**
NGED	Network Party	Yes	Whilst a small number of Consumers may feel that they benefit from not sharing their data, there will be no actual benefit to Consumers in restricting the usage of a Smart Meter. Overall, it could be argued that Consumers will be negatively impacted (financially and operationally) in the long term if Network Operators are unable to use the granular energy consumption data that Smart Meters record to enable large-scale demand shifting, which would allow consumers to shift electricity demand away from peak times towards periods where cheaper, lowcarbon generation is available. In the same way, it is likely that the consumers that do not wish to share their Consumption Data will be unable to benefit from Time of Use Tariffs that may be offered by Suppliers.
ENW	Network Party	Yes	Benefits as they have the defined option to restrict access, (presumably they would want no communication at all). Impact – indirectly, unable to perform data mining to support network monitoring for faults that leads to better planning and implementation of grid improvements/stability for future.
AltHAN Co	Other SEC Party	No comment	n/a

Question 9: Noting the costs and benefits of this modification, do you believe Solution Option 1a or 1b should be approved?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	Neither Option 1a nor 1b is appropriate. Both are extremely expensive, and don't actually address the problem statement for consumers who don't actually want a smart meter in their home – Restricted Mode or not.
EDF	Large Supplier	Option 1b	EDF do not see the benefit in spending ca £1M on developing a solution for an obsolete DSP. Considering the numbers of customer we think will request the restricted flag, we do not consider there is sufficient benefit in supporting the earlier implementation. Waiting for the new DSP implementation and a much-reduced costs seems much more appropriate.
E.ON Next	Large Supplier	Yes - Solution Option 1b only	Reasons already given
Utilita	Large Suppliers	No	These solutions do not adequately resolve the issue identified and negatively impact the future uses of a Smart metering network, removing the ability for these customers to be included in time of use style tariffs, or customer led flexibility schemes. Additionally, if these customers experience issues with their meters functionality, we have no ability to remotely assess and triage these issues, meaning an engineer would have to visit the property.
ENGIE	Small Supplier	Solution 1b	Although we do not favour option 1, Option 1b at least is the cheaper of the two options.

Question 9			
Respondent	**Category**	**Response**	**Rationale**
UKPN	Network Party	No	UK Power Networks believe the costs to implement Option 1a or 1b are far greater than Option 2 with a number of impacts that are detrimental as outlined above and therefore do not feel this solution option should be approved.
NGED	Network Party	No	This is based on the information provided in our responses to Q1 – Q8
ENW	Network Party	No	The costs would significantly outweigh the benefits, as high level of costs attached to creating internal process and monitoring to make sure these consumers are correctly treated at each trigger point (CoS, CoT, Install) plus the indirect impact to other SEC Parties makes benefit realisation/innovation an impossibility.
AltHAN Co	Other SEC Party	No comment	n/a

Question 10: Please provide any further comments you may have on Solution Option 1a and 1b.

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
British Gas	Large Supplier	The modification could also impact settlement costs, if a significant (5%+) number of smart meter customers decided at some point to request activation of the Restricted Attribute.	
EDF	Large Supplier	Although EDF can see a benefit in the restricted flag that will help provide a solution to a very small number of consumers concerns, we are minded to consider that most customers refuse smart meters because they are not	

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
		mandated and nobody is making them have one. The number of customers with specific privacy concerns is minute in comparison. We constantly lobby DESNZ to reconsider their policy levers to encourage more of these customers to support and accept a smart meter or face defined specific costs aligned to the cost of managing the legacy meter estate.	
E.ON Next	Large Supplier	-	
Utilita	Large Supplier	No further comments	
ENGIE	Small Supplier	No further comment.	
UKPN	Network Party	N/A	
NGED	Network Party	No further comments.	
ENW	Network Party	-	
AltHAN Co	Other SEC Party	Please note the potential operational impacts on energy Suppliers set out in Question 7, where the Alt HAN solution has been installed to meet the HAN obligations or Gas meter connectivity.	

Question 11: Do you agree that the Solution Option 2 will effectively resolve the identified issue?

Question 11			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	The solution doesn't address customer concerns where the customer still does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not. Separately, the Restricted Flag in Option 2 would only be known by the current Energy Supplier. This means that other non-Supplier parties (Other Users – especially if MP234 is passed, introducing Public Task and Legitimate Interest – and Network parties) would still be able to communicate with the meter, against the customer's request. It also means that it would be hard for any audit processes to confirm to the customer that their meter was correctly operating in Restricted Mode – it would be dependent on each Supplier's systems working 100% correctly in this new complex build.
EDF	Large Supplier	No	We do not believe that there is a way to ensure all suppliers implement a standardised solution and there is no way to ensure Other DCC Users are held to account for not agreeing to restrictions
E.ON Next	Large Supplier	No	Same rationale as shown in question 1
Utilita	Large Supplier	No	We do not believe that this solution will adequately resolve the issue identified. Solution Option 2 provide a less comprehensive solution to this issue and requires significant investment and development from Suppliers and\or Adaptors to meet the requirement. This option penalises Suppliers with allowing other parties full access to the customer's data, as only the Supplier party is required to abide by the procedure. We do not believe the customer would accept this.
ENGIE	Small Supplier	Yes	This is the most cost effective option and is better suited to a wide range of suppliers, not all of whom will have large SMETS2 portfolios.

Question 11			
Respondent	**Category**	**Response**	**Rationale**
UKPN	Network Party	Yes	UK Power Networks considers that Option 2 will effectively address the identified issue by enabling customers to opt out of sharing their individual consumption data with their supplier, without negatively impacting the operation of the Network.
NGED	Network Party	No	1. As we understand it, this modification would only apply to credit meters. Therefore, the main issue of the contradiction as detailed in our response to Q1, would continue to exist for a large proportion of Consumers. 2. The Mod Report states that "Network Parties and Other Users would not be prevented from collecting Consumption Data". Whilst this is an outcome that we would support, we would question how the Consumers (that have specifically asked for their data not to be shared) would feel knowing that Suppliers will not be collecting their Consumption Data but Network Parties and Other Users can continue to do so. We would assume that these Consumers would not want their data shared with ANY party. In addition, we require clarification on whether Consumers will be informed of this and if so, how. 3. The SAP states "if the Consumer does not have a SMS, then a SMS should be installed at the property." We would question what would lead a Consumer to request that their data is not shared if they do not have a Smart Meter? Surely the most efficient action to take in this scenario is to leave the traditional/heritage meter in place, given the minimal amount of Consumers that this is likely to affect (based on the first Refinement Consultation suggesting an average of 1.5% Consumers and a handful of Ombudsman complaints leading to action). 4. The SAP lacks detail. In particular, what is the evidence that Suppliers should be gathering to confirm a Consumer does not wish for their Smart Meter to communicate? How should this be obtained/stored/reported on/etc. How will this be communicated to the Consumer? 5. The SAP instructs Suppliers to set up a list of Consumers who have requested a restricted meter, and maintain this list within their own systems. What is the process in the event of a Change of Supplier? Would the Consumer be expected to submit another request, and if so, will this be clearly communicated to them? Would the existing Supplier be expected to pass on the information to the new Supplier, and if so, how should this be done? We have significant concerns on the potential for

Question 11			
Respondent	**Category**	**Response**	**Rationale**
			manual error which could lead to a data breach, so a great deal of further direction should be provided on how these internal lists will work.
ENW	Network Party	Yes	It blocks the pre-determined disallowed SRVs and alerts from being sent to/from the device, therefore fulfils the consumer request.
AltHAN Co	Other SEC Party	-	No comment

Question 12: Do you agree that the legal text in Annex H will deliver Solution Option 2?

Question 12			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	See Question 11 above.
EDF	Large Supplier	No	Section F4.1D states: Where a consumer specifically requests a Smart Meter be installed in a non-communicating mode Suppliers should adhere to SEC Agreed Procedure SAP01. We do not accept that a customer has the right to request and receive a restricted flag. It is ultimately the Suppliers choice, backed up by a contract, to install the appropriate metering system. See answer to Question 1
E.ON Next	Large Supplier	No	Clause F4.1D refers to 'non-communicating mode' but the Smart Meter will still communicate. The SEC Agreed Procedure refers to restricting SMS communications - could something similar be used in Clause F4.1D?
Utilita	Large Supplier	Yes	The legal text as drafted will deliver the solution outlined.

Question 12			
Respondent	**Category**	**Response**	**Rationale**
ENGIE	Small Supplier	Yes	No comment.
UKPN	Network Party	Yes	UK Power Networks believe that the legal text in Annex H will deliver Solution Option 2.
NGED	Network Party	No	The additional legal text in Annex H only serves as a signpost to SEC Agreed Procedure SAP01, however we do not feel that the SAP provides enough detail to deliver the solution (as detailed in our answer to Q11).
ENW	Network Party	Yes	-
AltHAN Co	Other SEC Party	-	No comment

Question 13: Do you agree with the proposed implementation approach for Solution Option 2?

Question 13			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	The solution doesn't address customer concerns where the customer still does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not.
EDF	Large Supplier	No	Development of our own systems to block any data related SRs may not be as straight forward as it sounds. Reporting and internal controls will need to be implemented which will need to be prioritised against other essential developments. A Q1 2026 implementation date is unachievable and will be inconsistent across Suppliers

Question 13			
Respondent	**Category**	**Response**	**Rationale**
E.ON Next	Large Supplier	Yes	Proposed implementation is not mandatory to be applied by Suppliers. For Suppliers to implement Solution Option 2 it will require significant and costly changes to be made to the User System Adapter to enable removal of the Read Schedule for individual consumers, and to maintain a record of customers in Restricted mode. Where Restricted mode is set as the behest of the consumer, they can appoint an Other User to collect data from their smart meter even though they have instructed their Supplier that they do not want a smart meter installed. The Modification Report refers to implementation expected to be one Working Data following Authority Decision. Suppliers will require time to introduce changes to its User System - Adapter to allow Solution Option 2; in some cases contractual changes may be needed with its Shared Resource Provider and/or technical services providers. What period of time will be allowed for Suppliers to facilitate any such introduction? Where Suppliers choose not to introduce Solution Option 2 what, if any action, would be taken?
Utilita	Large Supplier	No	The proposed implementation approach would see this agreed procedure being implemented ahead of supplier readiness to provide the service outlined. The implementation date should reflect the lead time required by Suppliers to ensure system readiness.
ENGIE	Small Supplier	Yes	This solution should be quick and easy to implement as it only requires a code change.
UKPN	Network Party	Yes	UK Power Networks believe the utilisation of a SEC Agreed Procedure to be the quickest, most efficient and most cost effective implementation approach for this.
NGED	Network Party	No	We do not agree that the proposed solution is fully formed therefore we cannot agree with an implementation approach that would see the solution implemented within a short timeframe.
ENW	Network Party	Yes	It removes the need for request on FMS, which adds a level of unnecessary complexity. Suppliers only need to not add a read schedule, which presumably can be built into a specific mapped process on system to update the consumer with the restricted flag.

Question 13			
Respondent	**Category**	**Response**	**Rationale**
AltHAN Co	Other SEC Party	-	No comment

Question 14: Will there be any impact on your organisation to implement Solution Option 2?

Question 14			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	Yes	We would need to build the restrictions into our adaptor and adaptor interfaces, to ensure that when the Restricted Flag is ticked, that no SRVs on the blocked list are sent for that meter. We would also need to introduce new processes for recording and managing the Restricted Flag consent, including around any Change of Supplier and Change of Tenancy processes. We would also need to implement changes in a wide number of existing systems, including: - Impact on Billing – recognising when no read is due to Restricted Flag - Impact on MHHS – recognising when no read is due to Restricted Flag - Impact on new Smart GSOP management systems, which are already in development Interaction with import/export tariffs that need an active smart meter for eligibility
EDF	Large Supplier	Yes	We will require development of our own systems to block any data related SRs may not be as straight forward as it sounds. Reporting and internal controls will need to be implemented which will need to be prioritised against other essential developments.

Question 14			
Respondent	**Category**	**Response**	**Rationale**
E.ON Next	Large Supplier	Yes	Where the decision is made to implement Solution Option 2, this would be expected to be one Working Day following the Authority Decision. If the Supplier chooses to implement Option 2 what time period is allowed to make the necessary system changes to the User System Adapter? This may require contractual changes with the Shared Resource Provider, if one is appointed, or with other technical service providers.
Utilita	Large Supplier	Yes	We would require a new policy and process to manage this, as well as to update our training and user guides for operational, field services and call centre staff. There would also be significant system changes to block the sending of the Restricted SRVs, either at an adaptor level or within our CRM system. This would lead to additional regression testing activities required in all future releases as long as this procedure is in place.
ENGIE	Small Supplier	Minimal impact	This solution uses an existing process (disablement of the Read Schedule).
UKPN	Network Party	No	There will be no impact for UK Power Networks.
NGED	Network Party	No	The Modification Report states that Network Parties would not be prevented from collecting Consumption Data therefore we would not expect to be affected by the implementation of Solution Option 2. That being said, we would require confirmation that Consumers who ask for their data not to be shared, will be made fully aware that Network Operators can continue to obtain this data. We would also require this to be written in to legal text and the SAP01.
ENW	Network Party	No	As a DNO we would not be impacted by this.
AltHAN Co	Other SEC Party	No	No comment

Question 15: Will your organisation incur any costs in implementing Solution Option 1a or 1b?

Question 15			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	£500 or more costs, £0 savings	We estimate the cost of implementing Solution Option 2 in 2027 to be £5.5 million to £7.5 million. If implementation could be delayed until later in 2028, or early 2029, the cost would fall to £3.5 million to £5.5 million. The higher cost for 2027 is because of our non-domestic CRM migration programme – we would need to install the solution in both our old and new non-domestic systems. The implementation cost would be lower if the Restricted Attribute was only required for domestic customers, not non-domestic customers (£2 million to £3 million). We would also have significant ongoing costs to manage the various exceptions and tasks outlined in our answer to Question 14. We don't have an estimate for this. Any cost savings (from dealing with Ombudsman referrals for example) would be minimal in relation to the expected new costs.
EDF	Large Supplier	£500 or more costs, £1-£49,999 savings	The development will be expensive and the number of customers impacted minimal
E.ON Next	Large Supplier	-	-
Utilita	Large Supplier	£50,000-£249,000	We note that these costs would likely be to the higher end of the scale, as this solution requires significantly more system development work than Options 1a\b. This also includes costs to produce or

Question 15			
Respondent	**Category**	**Response**	**Rationale**
		costs, £0 savings	modify policy, process and training materials. We do not anticipate there to be any cost savings realised as part of this implementation.
ENGIE	Small Supplier	£50,000-£249,000 costs, £0 savings	We assume this question was intended to refer to Option 2. There is no cost to implement this option as it uses an existing process.
UKPN	Network Party	£0 costs, £0 savings	There will be no changes to UK Power Networks, resulting in no implementation costs or anticipated immediate cost savings. However, there is potential for future cost savings if more accurate network loading data from smart meters leads to more informed investment in network reinforcement.
NGED	Network Party	£1-£49,999 costs	Please note that we are answering this based on our assumption that the question should refer to Solution Option 2, rather than as it currently states – Solution Option 1a/1b. We expect our costs to be minimal since, as a Network Operator, we do not expect to be affected, however there will be costs involved in updating our documentation libraries.
ENW	Network Party	£0 costs, £0 savings	Nothing to implement and we would continue as per BAU.
AltHAN Co	Other Sec Party	£0 costs, £0 savings	No comment

Question 16: How long from the point of approval would your organisation need to implement MP169 if Solution Option 2 were approved?

Question 16			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	18-24 months	6-12 month delivery time, but would not be able to start for 12 months, due to other regulatory priorities already in the development backlog (MHHS, Smart GSOP etc).
EDF	Large Supplier	12 months	We do not consider option 2 to be viable or beneficial
E.ON Next	Large Supplier	-	Approximately nine to twelve months
Utilita	Large Supplier	6-12 months	We would need to raise work orders and have the change assessed and prioritised, then stand up development resource to work on this in addition to writing new policy documents, revising training etc. We note this would likely run towards the longer end of this scale due to the additional complexity and more significant system changes and testing required.
ENGIE	Small Supplier	1 month	All that would be required is staff briefing of the change.
UKPN	Network Party	No lead time applicable	No change is required so no lead time applicable.
NGED	Network Party	Approximately one month	To ensure our documentation libraries reflect the implemented legal texts/documentation/procedures.
ENW	Network Party	Immediately	Nothing for us to implement under this option

Question 16			
Respondent	**Category**	**Response**	**Rationale**
AltHAN Co	Other SEC Party	-	No comment

Question 17: Do you believe that the DCC System Solution Option 2 would better facilitate the General SEC Objectives?

Question 17			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier		Positive: (f), Neutral: (b), (h) Negative: (a), (c), (d), (e), (g)
EDF	Large Supplier		Positive: Neutral: (d), (g), (h) Negative: (a), (b), (c), (e), (f)
E.ON Next	Large Supplier		Positive: Neutral: (b), (d), (f), (h) Negative (a), (c), (e), (g)
ENGIE	Small Supplier		Positive: (a)

Question 17			
Respondent	**Category**	**Response**	**Rationale**
			Neutral: (b), (c), (d), (e), (f), (g), (h) Negative:
UKPN	Network Party		Positive: (a), (f) Neutral: (b), (c), (d), (e),(g), (h) Negative:
NGED	Network Party		Positive: Neutral: (b), (c),(d), (e), (g), (h) Negative: (a), (f)
ENW	Network Party		Positive: (a), (d), (e), (f) Neutral: (b), (g) Negative: (a), (f)
AltHAN Co			Positive: Neutral: (h) Negative:

Question 18: Do you believe there will be any impacts on or benefits to consumers if Solution Option 2 is implemented?

Question 18			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No (negative impact)	For a very small handful of consumers, this would allow them to request a smart meter operating in Restricted Mode. However, this solution doesn't address customer concerns where a customer does not want a Smart Meter in their property, whether it is operating in Restricted Mode or not. For the remaining 95%+ (or 99%+) customers, the industry would incur significant extra costs, resulting in higher bills.
EDF	Large Supplier	No	It may be a cheaper solution than 1a or 1b, but it will introduce more regulation and provide consumers with rights that they do not currently have
E.ON Next	Large Supplier	Yes – impacts only	Implementation of Solution 2 will impact the consumer as the cost of implementation may be passed onto the consumer in future energy costs billed. Implementation of Solution 2 will not fully address consumers' request not to have a smart meter installed. Implementation of Solution 2 does not support Smart meter device rollout.
Utilita	Large Supplier	Yes	For customers who are concerned about their energy supplier having access to their consumption data, this modification would have positive benefits. However, it is important to note that unlike Solution 1, this solution would not restrict all access to the consumption data, and other non-Supplier parties would continue to have access. The information that a specific customer has requested restricted communications is also not shared amongst suppliers, so if a customer were to move suppliers, they would be required to contact the new supplier and request the restricted mode be activated again. There are no impacts on other customers.

Question 18			
Respondent	**Category**	**Response**	**Rationale**
ENGIE	Small Supplier	Yes	Solution 2 ill deliver the benefit at negligible cost in comparison to Solution 1, and avoids the risk of implementing an expensive solution which is rejected by consumers who simply do not want a Smart meter at all, or who do not trust the process of restricting the meter.
UKPN	Network Party	Yes	UK Power Networks' understanding is that consumers who opt not to share their consumption data with their supplier may be adversely affected by this decision, as they could become ineligible for specific tariffs that require consumption data to be provided. Consequently, these consumers may receive different treatment from their supplier compared to others and potentially incur higher costs for the same level of electricity usage. It will be the responsibility of suppliers to ensure that consumers are appropriately informed about the potential implications of withholding their consumption data. However, if Option 2 is implemented the network will not incur any negative effects from this decision.
NGED	Network Party	Yes	Whilst Consumers will not be sharing their Consumption Data with their Supplier as per their request, they will not experience any benefits from doing this, as such. In addition, they will still be sharing it with Network Parties and Other Users so we see little change to Consumer benefits overall. As detailed in our answer to question 11, we feel the SAP lacks important detail and this could cause an impact on consumers by way of miscommunication, misinformation or errors which could lead to a data breach.
ENW	Network Party	Yes	Same benefit as under solutions 1a & 1b. No impacts, removes the indirect scenario (see Q8)
AltHAN Co	Other SEC Party	-	No view

Question 19: Noting the costs and benefits of this modification, do you believe Solution Option 2 should be approved?

Question 19			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	No	Option 2 is extremely expensive, and doesn't actually address the problem statement for consumers who don't actually want a smart meter in their home – Restricted Mode or not.
EDF	Large Supplier	No	Inconsistent implementation, DCC Other Users are excluded, more regulation, Consumers afforded choices they don't currently have
E.ON Next	Large Supplier	No	Solution Option 2 is non mandatory so introduces inconsistencies within the Supplier community. These inconsistencies may become visible to customers during CoS or CoT events. For example, where a customer moves between suppliers who have adopted different designs or operating practices associated with MP169 this may trigger adverse feedback from customers.
Utilia	Large Supplier	No	These solutions do not adequately resolve the issue identified and negatively impact the future uses of a Smart metering network, removing the ability for these customers to be included in time of use style tariffs, or customer led flexibility schemes. Additionally, if these customers experience issues with their meter's functionality, we have no ability to remotely assess and triage these issues, meaning an engineer would have to visit the property. This solution also requires each Supplier to develop their own solution to implement the agreed procedure, thus increasing the cost to each individual party.
ENGIE	Small Supplier	Yes	For the reasons as stated above
UKPN	Network Party	Yes	UK Power Networks believe solution Option 2 is the most cost-effective method to implement the solution.
NGED	Network Party	No	As per the reasons stated in our answers to Q11 – Q18.

Question 19			
Respondent	**Category**	**Response**	**Rationale**
ENW	Network Party	Yes	Preferable over options 1a&1b for certain, less bureaucracy and allows suppliers to monitor from their end which makes sense as they are the direct link to the consumer.
AltHAN Co	Other SEC Party	-	No view

Question 20: Please provide any further comments you may have on Solution Option 2.

Question 20		
Respondent	**Category**	**Comments**
British Gas	Large Supplier	Solution Option 2 is worse than Option 1a/1b. The costs would be higher (with substantial changes needed to all adaptors, not just the DCC), and performance assurance would be harder to monitor. The modification could also impact settlement costs, if a significant (5%+) number of smart meter customers decided at some point to request activation of the Restricted Attribute.
EDF	Large Supplier	N/A
E.ON Next	Large Supplier	How would adopting Solution Option 2 impact on the Supplier's meter installation mandate? Do meters installed under Solution 2 count towards the Supplier's mandate?
Utilita	Large Supplier	N/A
ENGIE	Small Supplier	No further comments.

Question 20		
Respondent	**Category**	**Comments**
UKPN	Network Party	N/A
NGED	Network Party	No further comments.
ENW	Network Party	-
AltHAN Co	Other SEC Party	Please note the potential operational impacts on energy Suppliers set out in Question 7, where the Alt HAN solution has been installed to meet the HAN obligations or Gas meter connectivity.

Question 21: Solution Option 1a and 1b will be set by the Supplier and will result in a consumer's data not being shared with Network Parties or Other Users, however under Solution Option 2 only the Supplier will have limited communications. Do you have any specific feedback on this that you have not already provided in this response?

Question 21			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	Yes	We are concerned that the Restricted Flag in Option 2 would only be known by the current Energy Supplier. This means that other non-Supplier parties (Other Users – especially if MP234 is passed, introducing Public Task and Legitimate Interest – and Network parties) would still be able to communicate with the meter, against the customer's request.

Question 21			
Respondent	**Category**	**Response**	**Rationale**
			It also means that it would be hard for any audit processes to confirm to the customer that their meter was correctly operating in Restricted Mode – it would be dependent on each Supplier's systems working 100% correctly in this new complex build. As flagged in our answer to Question 17 regarding General SEC Objective (d), we also think it introduces competition issues between Energy Suppliers (who would be subject to the restriction) and energy apps (who could still be given consent separately by the customer).
EDF	Large Supplier	Yes	It is not acceptable that networks and Other Users are unrestricted yet Suppliers are excluded from taking data required under contract for the main purposes that smart meters were designed.
E.ON Next	Large Supplier	Yes	Solution Option 1a and 1b restricts the collection of customer data hence the reason why it cannot be shared with Network Parties or Other Users. Network Parties and Other Users have been invited to respond to the consultation about the Solution Options and will have a vote on the Change.
Utilita	Large Supplier	No	While we have provided input on this in other answers, we have condensed these here for ease. Solution 2 restricts only Supplier access to their customers consumption data, while continuing to allow other Parties to access this data. This represents an inequitable situation where a third party could collect a customers data for their use, while the Supplier cannot do the same in order to fulfil their mandated and licenced activities.
ENGIE	Small Supplier	-	Whichever option is finally approved, it should be made clear in Code and to consumers exactly what the restrictions on data sharing are.
UKPN	Network Party	No	All specific feedback is provided above.
NGED	Network Party	No	We have provided our feedback on this particular subject in our response.
ENW	Network Party	Yes	Best option for us as Network operator as allows us to continue with benefits realisation projects

Question 21			
Respondent	**Category**	**Response**	**Rationale**
AltHAN Co	Other SEC Party	-	No comment

Question 22: Currently the Allowed/Disallowed SRV List/Restricted Attribute List will be overseen by the Operations Group (OPSG) for all Solution Options. Do you have any feedback on this, and do you feel that the Privacy Sub-Committee (PSC) should also be asked to provide feedback on any changes?

Question 22			
Respondent	**Category**	**Response**	**Rationale**
British Gas	Large Supplier	Yes	The Privacy Sub-Committee should also be asked to provide feedback. This isn't a SEC Section I issue (which is the main area of focus for PSC) but their opinion would still be very valuable.
EDF	Large Supplier	Yes	OPSG is the correct forum for determining the allowed SRV List
E.ON Next	Large Supplier	Yes	To ensure visibility and completeness, the Privacy Sub Committee should be invited to provide feedback on the List and any changes considered by the Operations Group.
Utilita	Large Supplier	Yes	This makes sense, however, we need to ensure that this additional step does not add significant delay to a new list being approved.
ENGIE	Small Supplier	-	It would seem sensible for the PSC to review the list.

Question 22			
Respondent	**Category**	**Response**	**Rationale**
UKPN	Network Party	No	UK Power Networks do not believe solutions Option 1a or Option 1b are the correct solutions and therefore do not feel the PSC should be asked to provide feedback on those solutions.
NGED	Network Party	No	We feel the OPSG would be appropriate and sufficient for this task
ENW	Network Party	Neutral	As member of OPSG I have no strong opinion on this, if there is a clear need for PSC to have an input I cannot foresee an issue.
AltHAN Co	Other SEC Party	-	No comment

Question 23: Do you hold any further information which relates to the business case for this modification?

Question 23		
Respondent	**Category**	**Comments**
British Gas	Large Supplier	N/A.
EDF	Large Supplier	We do not believe that there is a justifiable business case for this modification as the numbers of customers refusing a smart meter for data reasons is only 3-4% of which some will be PAYG and restricted from the solution
E.ON Next	Large Supplier	[Confidential Response]
Utilita	Large Supplier	No comments

Question 23		
Respondent	**Category**	**Comments**
ENGIE	Small Supplier	No further comment
UKPN	Network Party	N/A
NGED	Network Party	No
ENW	Network Party	n/a
AltHAN Co	Other SEC Party	No

Question 24: Please provide any further comments you may have on the Solution Options.

Question 24		
Respondent	**Category**	**Comments**
British Gas	Large Supplier	N/A
EDF	Large Supplier	We would like to reiterate the key points: • Smart meters are expensive and designed to operate in smart mode such that they achieve the benefits stated in the Government business case and be a key enabler for the net zero transition and the Clean Power 2023. • It's not the customer that should decide whether restricted mode should be set. They have a contract that requires a smart meter. • Costs appear to be in excess of the benefits gained for the very small number of customers that are restricted • Excluding ENOs and Other Users in Option 2 is not acceptable
E.ON Next	Large Supplier	How would adopting Solution Option 1a or/and 1b impact on the Supplier's meter installation mandate? Do meters installed under Option 1a or/and 1b count towards the Supplier's mandate?

Question 24		
Respondent	**Category**	**Comments**
Utilita	Large Supplier	No further comments
ENGIE	Small Supplier	No further comment
UKPN	Network Party	N/A
NGED	Network Party	Referencing page 44 of the DESNZ consultation on Smart Metering Policy Framework – Post 2025, we would draw attention to their statement of the following: "We therefore consider that the combination of an all reasonable steps obligation to complete the smart meter rollout, with strengthening the existing obligation to ensure smart meters are operating in smart mode, is the right framework to deliver the overall ambition of 100% operational smart meter coverage." This substantiates our belief that Smart Meters, when fitted, should be operating in smart mode to deliver the ambition of the Smart Meter Rollout and support the Clean Power 2030 Mission.
ENW	Network Party	-
AltHAN Co		Alt HAN Co welcomes the progress made with this modification. As previously noted in our response to the RFI in 2024, we recognise the challenges around customer engagement which have already been highlighted by others. We note that there may be an even greater challenge of customer engagement in the edge cases where Alt HAN devices are required to connect to the gas meter in the 'restricted' mode (note rationale below). However, Energy Suppliers can factor this into their engagement approach once this Modification has been implemented. *Considerations for Suppliers:* *The Alt HAN solution requires a device to be plugged into the customers property to receive and send communications to the Comms Hub. If a customer wants a meter operating in 'restricted' mode they may be less likely to accept the need for an Alt HAN device plugged into their home.*

Question 24		
Respondent	**Category**	**Comments**
		We expect this to be an edge case for this issue, the likely outcomes in the event that a customer wants a smart meter in restricted mode, where Alt HAN is required, is that: *1. The customer declines to have the Alt HAN device, in which case the Supplier is unable to commission the Gas meter* *2. The customer declines to have the Alt HAN device, in which case the Supplier commissions the Gas meter (either by bringing the meter 'close' to the Comms Hub or by installing and then uninstalling Alt HAN, leaving the Gas meter as 'Non Operating').* *3. The customer agrees to allow the Alt HAN device to be plugged in, in which case the commission and operation of the GSME (and other devices in the home) is complete and the restricted SRs can be sent, in accordance with the MP169 solution).* *In the event that a customer requests 'restricted mode' post installation, a Supplier can remove the Alt HAN device if the customer wishes (which leads to the same outcome as (2) above). If a customer then changes their mind or an incoming resident changes the status, the Supplier will need to re-install the Alt HAN device(s).*