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# MP208 ‘Northbound Prioritisation of N56 Alerts’

## Annex D

## Refinement Consultation responses

### About this document

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This document contains the full collated responses received to the MP208 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 |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | Yes      | We really support this change due to the positive impact it will have on our consumers who chose to top up in store. If the change is successful, it will improve the overall customer experience when topping up their smart pay as you go meter.                                                                                                                                                                                                                                                                                                                                                                                                                                         | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | Yes      | We agree that a prioritisation mechanism has the potential to minimise consumer impacts during periods of high demand on available capacity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | Yes      | <p>We believe that the solution will resolve the identified issue, however we have concerns regarding prioritising traffic, especially as this topic has been so challenging in the past.</p> <p>Our understanding of the solution is that only Supplier traffic will be impacted by their N56 alerts jumping to the front of their queue if they have traffic in their retry buffer? Therefore our agreement that the solution is appropriate is on the basis that the N56 prioritisation will not impact our traffic at all as a DNO. That said we understand that the proposed solution will impact our traffic where we have traffic waiting in our retry buffer as this will then</p> | -              |

| Question 1 |          |          |                                                                                                                                                                                                                                                                                                                                                                                         |                |
|------------|----------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent | Category | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                               | SECAS Response |
|            |          |          | <p>follow the priority levels dictated in the Traffic Management Mechanism Document.</p> <p>We also note that SECAS requested that the DCC investigate whether the solution can include a mechanism to ensure that messages with a lower priority are not required to wait for an indefinite amount of time to be processed and we can't see details of this having been addressed.</p> |                |

## Question 2: Do you agree that the legal text will deliver MP208?

| Question 2                             |                |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                |
|----------------------------------------|----------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                             | Category       | Response | Rationale                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | SECAS Response |
| EDF Energy Customers Limited           | Large Supplier | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | -              |
| Utilita Energy Ltd                     | Large Supplier | Yes      | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | -              |
| National Grid Electricity Distribution | Network Party  | Yes      | <p>Whilst the legal text will deliver the proposed solution we feel that it is missing details regarding our previous point around messages with a lower priority not being held indefinitely.</p> <p>We also note that the proposed legal text for the Traffic Management Document has several terms that we cannot see defined anywhere. These include:</p> <p>‘Service User Retry Buffer’</p> <p>‘Northbound Message Store’</p> <p>‘Request Manager North’</p> <p>‘Message Gateway North’</p> | -              |

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

| Question 3                                    |                |          |                                                                                                                               |                |
|-----------------------------------------------|----------------|----------|-------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                                    | Category       | Response | Rationale                                                                                                                     | SECAS Response |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | Yes      | Whilst we would prefer the change to be implemented sooner, we wouldn't want to compromise the success of the implementation. | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | Yes      | We agree that a resolution should be implemented as soon as possible.                                                         | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | Yes      | We agree with the proposed implementation approach.                                                                           | -              |

## Question 4: Will there be any impact on your organisation to implement MP208?

| Question 4                                    |                |          |                                                                                                                                                                                                                 |                |
|-----------------------------------------------|----------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                                    | Category       | Response | Rationale                                                                                                                                                                                                       | SECAS Response |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | No       | Internal communication will be required of the change.                                                                                                                                                          | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | No       | Our systems are built in the same manner as described in the modification document. This means that any N56 prioritisation would support the effective operation of our systems as they are currently designed. | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | Yes      | We believe we will be impacted by the reasons stated in the modification report.                                                                                                                                | -              |

## Question 5: Will your organisation incur any costs in implementing MP208?

| Question 5                                    |                |          |                                                                                                            |                |
|-----------------------------------------------|----------------|----------|------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                                    | Category       | Response | Rationale                                                                                                  | SECAS Response |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | No costs | Ensuring all relevant parties involved are aware of the change and prepared for it.                        | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | No       | As stated above, more reliable returns of N56 alerts would support our architecture as currently designed. | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | No costs | -                                                                                                          | -              |

## Question 6: How long from the point of approval would your organisation need to implement MP208?

| Question 6                             |                |          |                                                                    |                |
|----------------------------------------|----------------|----------|--------------------------------------------------------------------|----------------|
| Respondent                             | Category       | Response | Rationale                                                          | SECAS Response |
| EDF Energy Customers Limited           | Large Supplier | 3 months | To make sure everyone involved is aware and aligned on the change. | -              |
| Utilita Energy Ltd                     | Large Supplier | N/A      | No changes required.                                               | -              |
| National Grid Electricity Distribution | Network Party  | N/A      | -                                                                  | -              |

## Question 7: Do you believe that MP208 would better facilitate the General SEC Objectives?

| Question 7                                    |                |          |                                                                                                                                                                            |                |
|-----------------------------------------------|----------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                                    | Category       | Response | Rationale                                                                                                                                                                  | SECAS Response |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | Yes      | As stated in the modification report we believe this change would better facilitate SEC objectives (a) & (b).                                                              | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | Yes      | (a) – improved efficiency of operation due to fewer timeout failures<br><br>(c) – reduces failed vends. Avoids customers being left unsure of meter and financial balances | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | Yes      | We believe that this modification will better facilitate the General SEC Objectives (a) and (b).                                                                           | -              |

## Question 8: Do you believe there will be any impacts on or benefits to consumers if MP208 is implemented?

| Question 8                                    |                |          |                                                                                                                                                                                                                                                                                           |                |
|-----------------------------------------------|----------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                                    | Category       | Response | Rationale                                                                                                                                                                                                                                                                                 | SECAS Response |
| <b>EDF Energy Customers Limited</b>           | Large Supplier | Yes      | This change will benefit the consumer and will provide a better, more competent smart payg as you go top up process for those customers who top up in store.                                                                                                                              | -              |
| <b>Utilita Energy Ltd</b>                     | Large Supplier | Yes      | The modification report correctly identifies the negative impacts on the group of consumers who are most likely to be vulnerable. Failed top ups attempts can have severe impacts on consumers. This modification has the potential to avoid these consequences for prepayment customers. | -              |
| <b>National Grid Electricity Distribution</b> | Network Party  | Yes      | We there could be positive and negative impacts to consumers for the reasons stated in the modification report.                                                                                                                                                                           | -              |

## Question 9: Noting the costs and benefits of this modification, do you believe MP208 should be approved?

| Question 9                             |                |          |                                                                                                                                                                                                                |                |
|----------------------------------------|----------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                             | Category       | Response | Rationale                                                                                                                                                                                                      | SECAS Response |
| EDF Energy Customers Limited           | Large Supplier | Yes      | Based on the previous points stated.                                                                                                                                                                           | -              |
| Utilita Energy Ltd                     | Large Supplier | Yes      | However, we request that SECAS & DCC assess all outstanding capacity related modifications to ensure issues are being resolved in the most efficiency and economic manner.                                     | -              |
| National Grid Electricity Distribution | Network Party  | No       | As per our responses to Q1 and Q2, we feel that there is still some additional work required to detail a full and final solution and therefore do not feel that as it stands we can approve this modification. | -              |

## Question 10: Please provide any further comments you may have

| Question 10                            |                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                |
|----------------------------------------|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent                             | Category       | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | SECAS Response |
| EDF Energy Customers Limited           | Large Supplier | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | -              |
| Utilita Energy Ltd                     | Large Supplier | <p>We note that there have been proposals to extend timeout windows, as included in the “Observations on the Issue” section of the Modification Report. We are strongly opposed to any proposals which result in a worse experience for the consumer. This includes proposals to increase timeout windows and/or introduce complexity to the payment handling process.</p> <p>We also note that SECMP0028 is stated as having a different business case to this proposal. Whilst MP0028 does seek to cover all traffic, it is exactly this kind of issue which it intends to resolve. Utilita’s experience with smart metering suggests that message prioritisation is crucial at times of heightened capacity demand, to ensure that consumer impacts are minimised. The objectives of MP0028 are directly aligned with this proposal.</p> <p>There are multiple capacity/traffic handling proposals outstanding. We request that SECAS &amp; DCC provides a clear view as to how to most economically and efficiently handle the overlap in these proposals.</p> | -              |
| National Grid Electricity Distribution | Network Party  | We would like to seek assurance from the DCC regarding potential future changes that Users would be able to make changes to the Priority Levels within the Traffic Management Mechanism Document                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | -              |

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| Question 10 |          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                |
|-------------|----------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Respondent  | Category | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | SECAS Response |
|             |          | without incurring additional costs. Whilst we appreciate that this modification is looking to prioritise only the N56 at the moment, as a DNO we might feel that certain alerts should be prioritised above SRV responses, and whilst we understand we could raise a change to the document to do this, we want to understand if this is likely to incur additional/significant costs that means that in reality all northbound prioritisation should be considered in one go, rather than in separate modifications. |                |