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MP219 ‘Accessing Consumption Data on behalf of SEC Parties’

Second Conclusions Report – version 1.0 (CLEAR)

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to approve MP219. It believed the modification better facilitated SEC Objectives (a)¹ and (c)².

Modification Report Consultation

SECAS received 11 responses to the Modification Report Consultation. Seven respondents believed the modification should be approved. They considered the modification better facilitated SEC Objectives (c) and (f)³.

Eight respondents believed the proposed changes to the Privacy Controls Framework should be approved, with three respondents against.

¹ facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

² facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ ensure the protection of Data and the security of Data and Systems in the operation of this Code.

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Modification Report Consultation responses

Summary of responses

Supportive Parties (Other SEC Parties and Small Supplier) noted that this modification would provide a smoother customer experience Energy Consumers to participate in National Grid's Demand Flexibility Service (DFS). This would remove the reliance on customers having to consent through various consent models, such as through their In-Home Display (IHD).

One respondent (Network Party) noted that they believed this modification could increase traffic across the DCC network as the employing Party could continue to request the same Consumption Data which the contracted Other User is also collecting. The respondent noted the figures used in the Modification Report about a 1% increase in traffic across the DCC System may not be accurate as the employing party may continue to collect Consumption Data while the contracted Other User is collecting it on their behalf.

One respondent (Large Supplier) rejected the modification as the changes to the Privacy Controls Framework, in particular the right of the consumer to opt out of an Other User collecting their data, would have made using an Other User impractical.

Another respondent (Large Supplier) rejected the modification as they considered that allowing Other Users to collect data without Unambiguous Consent could negatively impact the reputation of the Smart Metering Implementation Programme.

One respondent (Large Supplier) rejected the modification but noted they would change their response dependent on whether Citizens Advice supported the changes being made as part of this modification. SECAS engaged with Citizens Advice who confirmed they are supportive of the controls and changes being introduced as part of MP219.

Change Board vote

Change Board vote

The Change Board voted to recommend MP219 be approved by the Authority.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	4	1	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	2	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

Views against the General SEC Objectives

Objective (a)

The majority of the Change Board believed that MP219 will better facilitate SEC Objective (a). They noted that allowing Other Users to collect Consumption Data on behalf of Suppliers and Network Parties facilitated the efficient operation of Smart Metering Systems.

Objective (c)

The majority of the Change Board believed that MP219 will better facilitate SEC Objective (c) as this could enable increased participation in the Demand Flexibility Scheme. As such, they agreed that this modification better facilitates Consumers management of their energy usage by provision of appropriate information from their Smart Metering System.

Objective (f)

One Change Board member believed that MP219 would not better facilitate SEC Objective (f) as this modification makes it simpler for Other Users to collect data, however this did not improve the protection data but had a neutral impact.

Change Board discussions

The Change Board was invited to perform the final vote on [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#).

In response to consultation responses which rejected the modification based on potential DCC traffic increases, the Proposer (MR) advised that increases in network traffic as occur for a variety of reasons which do not relate solely to this modification. They added that any increases in network traffic could be considered as part of [DP218 'Review of the SEC Charging Methodology'](#).

A Change Board member (PCS) noted they had voted on mechanisms relating to designating the priority of messages. They questioned whether the data being collected by the Other User would be considered as low priority in terms of network traffic across the DCC System. The Proposer (MR) advised that this information should be given the same priority to data currently being collected by Suppliers for purposes of the Demand Flexibility Scheme. SECAS confirms that there is no current agreement which would lead to the Consumption Data being collected by the Other User in the scope of this modification which would be prioritised.

Citizens Advice (CG) advised that they have been involved with the development of MP219 and that their main concern has been addressed after changes SECAS had developed to the PCF, such as the consumers ability to opt out of an Other User collecting their data. SECAS (BG) advised SECAS presented the modification and associated changes to the Privacy Sub-Committee (PSC) who agreed on the level of assurance needed from the Independent Privacy Auditor (IPA) if this modification is approved. They advised that Citizens Advice were present at the PSC meeting and were happy with the level of assurance provided. Citizens Advice (CG) agreed with this and added that Citizens Advice were happy with the modification and associated controls.

The member (EJ) advised that they are also a member of the PSC. They advised that when the proposed changes to the PCF were presented to the PSC there were several options discussed to decide the level of assurance. They added the requirement of an opt out was decided on before

MP219 was brought before the PSC. They advised they are unsure as to why there needs to be an opt out mechanism. They stated there is wording in SEC Section I where Other Users can only collect this data if it is specifically requested by a Supplier and both the Supplier and Other User are responsible if anything is collected incorrectly. They added that this makes the modification unworkable. SECAS (BG) acknowledged this, but advised it was made clear from the meetings with Citizens Advice that the opt out had to be included before being brought to the PSC. The Proposer (MR) advised that the Supplier does not need to use this route if it is not workable for them. They added that Suppliers could consider raising a modification to make MP219 workable for them if they wanted an Other User to collect Consumption Data on their behalf.

A member (AH) disagreed that MP219 better facilitates SEC Objective (f). They argued that the simplification which this modification provided does not also lead to better protection of data.