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MP235 ‘Enhanced Meter Data access for Other Users’

May 2024 Working Group – meeting summary

Attendees

SEC Party Category	Working Group Members	Representing
Large Suppliers	Emma Johnson (EJ)	British Gas
	Alex Hurcombe (AH)	EDF
	Joey Manners (JM)	Octopus Energy
	Ralph Baxter (RB)	Octopus Energy
	Emslie Law (EL)	OVO
	Kevin Clark (KC)	Utilita
Other SEC Parties	Carl Whitehouse (CW)	Calisen Metering
	Dale Lloyd (DL)	CGI
	Geoff Huckerby (GH)	CGI
	Daniel Davies (DD)	ESG
	Martin Bell (MB)	EUA
	Matthew Roderick (MR)	N3rgy
	Stuart Blair (SB)	Northern Powergrid Metering
	Michael Snowden (MS)	Secure Meters
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
	Alan Creighton (AC)	Northern Powergrid
	Shuba Khatun (SK)	SSEN

Other Participants		
DESNZ		
Danny Holt (DH)	Rachel Allen (RA)	
DCC		
Bradley Baker (BB)	David Rollason (DR)	Gary Stuart (GSt)
David Walsh (DW)	Gary Williams (GW)	
SECAS		
Kev Duddy (KD) <i>Working Group Chair</i>	Rachel Black (RBI) <i>Meeting Secretary</i>	Kaveh Cope-Lahooti (KCL)
Elizabeth Woods (EW)	Mohammedanwar Sumro (MSu)	Simon Grimwood (SG)

Overview

Issue

- Other Users are limited in the Service Requests (SRs) they can access.

Impact

- Limiting Other Users in offering innovative services to Consumers.
- If Other Users have access to additional SRs this will enable consumers to have access to more granular data about their usage patterns, which in turn will assist them in making decisions about their energy usage.

Proposed Solution

- Allow Other Users to access 11 additional Service Reference Variants (SRVs):

Service Requests	
Service Reference Variant	Service Request Name
4.2	Read Instantaneous Export Registers
4.6.1	Retrieve Import Daily Read Log
4.6.2	Retrieve Export Daily Read Log
4.12.1	Read Maximum Demand Import Registers
4.12.2	Read Maximum Demand Export Registers
4.14	Read Prepayment Daily Read Log
4.16	Read Active Power Import
6.2.1	Read Device Configuration (Voltage)
6.2.5	Read Device Configuration (Instantaneous Power Thresholds)
6.2.9	Read Device Configuration (Payment Mode)
7.4	Read Supply Status

Preliminary Assessment summary

- Costs up to the end of Pre-Integration Testing (PIT) of between £60,000 and £235,000.
- Full Impact Assessment would cost £54,435 and would be completed within 40 working days.
- Impacts DCC User Interface Specification (DUIS) but not Great Britain Companion Specification (GBCS).
- Assumes that the eight active Other Users will each be collecting data from 45,000 Consumers at any one point in the month.

Working Group Discussion

SECAS (KD) provided an overview of the modification, noting the Preliminary Assessment and the actions from the December Working Group meeting.

Proposers' intention

The Proposer (MR) highlighted an increase in consumers seeking to interact with their energy usage data. They noted consumers are currently limited to gaining this information from their Supplier and the modification has been raised to provide parity of access to this data.

Use cases for Service Requests

A Working Group member (EJ) requested information about why SR 4.2 'Read Instantaneous Export Registers' had been included within the business requirements. The Proposer (MR) commented that occasionally when they collect half-hourly data there is missing information. They noted that by using this Service Request they can estimate the missing information. A Large Supplier member (EL) noted that Devices are not required by SMETS to populate each half hourly period and commented that could cause disputes over accuracy in future if this Service Request is used to determine disputed readings.

Privacy Implications

SECAS (KCL) noted that some of the Service Requests within the scope of the modification relate to Consumption Logs and questioned whether it was the Proposers intention to make changes to SEC Section I 'Data Privacy'. SECAS (KD) noted that legal text had not yet been developed but would need to be reviewed by the Privacy Sub-Committee regarding any changes to Section I. They noted that this would take place before the Refinement Consultation opens.

Links to MP234

The Proposer (MR) noted that SR 7.4 'Read Supply Status' and SR 4.14 'Read Prepayment Daily Read Log' had been included within the scope of the modification as they provide an opportunity for social housing providers and councils to look after their tenants. They explained that they had also raised [MP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'](#) which seeks to allow Parties to use GDPR principles to collect data from Consumers. A Large Supplier member (EJ) questioned whether the Consumers Unambiguous Consent would be required for Other Users to collect these Service Requests on their behalf. The Proposer clarified that Unambiguous Consent is required, but if MP234 was implemented then social housing providers could use the Legitimate Interest mechanism to access the data without Unambiguous Consent.

(EJ) noted that there could be multiple Other Users collecting data from Consumers at any one point, and with the introduction of MP234 this could be widened. The Proposer (MR) agreed, highlighting that there are between four and five million social houses in the UK which could lead to an increase an equal number of increased requests.

SECAS (KD) clarified that MP234 is currently on hold, pending the Ofgem decision on [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#).

Preliminary Assessment

Several Working Group members questioned the figures used in the Preliminary Assessment that eight Other Users would all be collecting data from 45,000 Consumers at any one point. The DCC (DW) clarified that the Proposer had provided the figures of how many requests they expected to collect from 45,000 Consumers at any one point, then DCC had extrapolated this figure against eight Other Users. A Working Group member (EJ) noted that as part of this modification no controls on Other User behaviour are being added to the SEC.

A Network Party member (SK) noted the information provided by SECAS that the assumed increase in SRV volumes is not material enough to warrant additional DSP infrastructure to be procured, but queried a comment saying that there would be a limited impact on existing infrastructure. DCC (DW) noted that the DSP have clarified that they can cope with the predicted volumes. They added that the CSPs have asked for investigation to take place into assess the impact of this modification under the Full Impact Assessment.

Forecasting

A large Supplier member (RB) noted the difficulty in forecasting but suggested that investigation should take place into scenarios where the DCC System would not be able to operate due to a large increase in volumes of Service Requests. They also noted that they are aware of large financial institutions which would like access to consumers energy data and so current usage estimates are not reliable. SECAS (KD) agreed that SECAS will investigate this and include detail in the Modification Report.

Next Steps

The following actions were recorded from the meeting:

- SECAS (BG) to present MP235 to the Privacy Sub-Committee in June before opening the Refinement Consultation.
- SECAS (BG) to work with DCC to examine scenarios where the DCC may be impacted by a large increase in Service Requests.