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MP253 ‘Traffic Management for Price Cap Update Events - User Actions Required’

August 2024 Working Group – Meeting Summary

Attendees

SEC Party Category	Working Group Members	Representing
Large Suppliers	Emma Johnson (EJ)	British Gas
	Alex Hurcombe (AH)	EDF Energy
	Amy Cox (AC)	EDF Energy
	Francesca Scott (FS)	EDF Energy
	Clare Manning (CM)	EON
	Sharon Armitage (SA)	EON
	Ralph Baxter (RB)	Octopus Energy
	Emslie Law (EL)	OVO
	Mahfuzar Rahman (MR)	Scottish Power
	Joanne Rush (JR)	SSE
	Kevin Clark (KC)	Utilita
Small Suppliers	Simon Moore (SM)	Bryt Energy
	Steve Blackler (SB)	E Gas & Electricity
Other SEC Parties	David Jones (DJ)	Alt Han Co
	Patricia Massey (PM)	BEAMA
	Beth Tatton (BT)	Calisen Metering
	Rob Heath (RH)	Calisen Metering
	Daniel Davies (DD)	ESG Global
	Craig Biffen (CB)	EUA
Network Parties	Kelly Kinsman (KK)	NGED
	Stuart Blair (SB)	Northern Power Grid
	Shuba Khatun (SK)	SSEN
	James Murphy (JM)	Stark

Other Participants		
DCC		
Bradley Baker (BB)	David Rollason (DR)	
David Walsh (DW)	Rosie Davies (RD)	
Citizens Advice		

Other Participants		
Emily Stone (ES)		
SECAS		
Simon Grimwood (SG) <i>Meeting Chair</i>	Alexandra Scott (AS) <i>Meeting Secretary</i>	Elizabeth Woods (EW) <i>Lead Analyst</i>
Mo Sumro (MS) <i>Lead Analyst</i>	Georgie Severin (GS) <i>Lead Analyst</i>	Ben Giblin (BG) <i>Lead Analyst</i>
Rainer Lischetzki (RL) <i>SECAS Consultant</i>		

SEC Party System Impacts

A Large Supplier (AH) noted they had not contributed to the MP253 second Refinement Consultation (RC) due to internal reasons. AH advised that their systems do not allow for future dated Service Reference Variants (SRVs), meaning their service provider would be required to make system changes if MP253 was to be approved and implemented.

AH noted another Large Supplier who had responded to the second RC noted they are in the same situation, and roughly estimated changes would potentially cost in excess of £1m. AH advised they are unsure if this cost would be split amongst all affected Parties. As a result of this potential cost and system development AH advised the proposed implementation date of the November 2024 SEC Release would not be possible for them specifically.

AH also queried how urgent or necessary MP253 is, as these potential Smart Energy Code (SEC) Party costs may not justify the benefit of the modification.

Price Cap Instructions Document (PCID)

A Large Supplier (SA) asked why actions that the Data Communications Company (DCC) would be responsible for during a Price Cap Update Event (PCUE) were not outlined in the proposed Code Required Document 'Price Cap Instructions Document' (PCID). The DCC (DR) advised they would need to take that question away for further review. Another DCC representative (DW) acknowledged the question is good, and although the DCC may not be doing anything different to their Business as Usual (BAU) activities during a PCUE, they could still include said BAU activities within the PCID.

SA also queried whether actions that would need to be taken by DCC Users if a DCC Outage or Incident took place would be outlined in the PCID, noting that the DCC should also be following the outlined instructions. DW acknowledged this and suggested adding this to the PCID.

Proposed Implementation Date

The Meeting Chair (SG) asked the Working Group if the proposed implementation date of the November 2024 SEC Release should be postponed to a later date. Out of the attendees who participated in the Slido poll, 63% said no, and 38% said yes. DW queried what would happen if MP253 was implemented in November 2024. SG advised that the legal text would come into force within the SEC on Thursday 7 November 2024, requiring SEC Parties to follow the PCID instructions from that date onwards. AH noted this would leave them in breach of the SEC.

SG noted the legal text specifies that if Users are unable to meet the instructions outlined within the PCID, Users would be required to reach out to the DCC one calendar month prior to a PCUE to agree alternative instructions to be followed during the PCUE. Currently Users are not required to follow this guidance, and although some are, others are not. It was also noted that those following the guidance currently could also cease to do this in the future.

RB advised that given the feedback from various attendees via the second RC and the Working Group, this would seem an odd way of forcing a Large Supplier into non-compliance. DR advised it is not the intention of the DCC to force non-compliance onto SEC Parties. DR noted it may not be fair to implement an obligation within the SEC that requires Users who have the means to follow it to do so, but Users who do not have the means would then be exempt.

SB noted they are unable to comply with some of the instructions outlined within the PCID, noting they have found issues internally with sending future dated SRVs in bulk, and would not have confidence in utilising this method during a busy period such as a PCUE.

SA noted that any obligation placed into the SEC has to be in place for all SEC Parties relevant to that issue, but an obligation cannot be placed within the SEC too quickly thus making some Parties non-compliant without giving them a timeframe to become compliant.

EL advised his organisation has been affected by the issues MP253 is trying to address. EL advised that the only choice is to implement instructions such as those outlined within the PCID, or for the DCC to implement more infrastructure to manage the DCC System traffic, but this would come at an exponential cost. EL advised that if Users cannot comply with the PCID, PCUEs will also have an impact to DCC System traffic. EL suggested the DCC provide some means of justifying the business case for example, cost savings or time saved. Finally, EL noted that Consumers are impacted by PCUEs.

Previous PCUEs

DD noted that DCC User Interface Specification (DUIS) outlines guidance for system traffic which has never been enforced. DD noted that PCUEs are high traffic events, but the last three have gone ahead without major incidents. DD queried whether implementing MP253 would change anything. EJ advised they were unsure on MP253, stating they are unsure if the modification is still needed as previous PCUEs have gone smoothly.

DR asked the question to the Working Group as to whether they are happy with a portion of DCC Users following the currently issued guidance whilst the remainder do not. No response was received to DR's question from the Working Group. DR advised that it was not just guidance alone that has contributed the PCUE performance being improved, and there may be a risk in the future if all Users stop following DCC guidance.

SEC Non-Compliance

DD noted there are no repercussions for any Users who do not follow the proposed PCID. DW noted that the SEC doesn't explicitly outline consequences for not following obligations, but Ofgem could hold SEC Parties in breach of the SEC, and DW advised the DCC are not the people to hold Parties accountable for non-compliance.