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

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP253 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**
E.ON	Large Supplier	Yes	Implementation of the Price Control Instructions Document (PCID) introduces an obligation on Users to follow instructions so that the DCC can apply a consistent approach for Price Cap Update Events.	-
Octopus Energy Ltd	Large Supplier	No	The Data/Reporting from the Modification Report does not include outcomes from recent Price Change events (latest being from the Oct 23 Price Change event). Given the Modification report was published in March 2024 then we would have expected there to be data from the Jan 24 Price Change. The reporting does demonstrate that there have been improvements in the success of Price/Tariff changes during Price Change events without the need to create obligations on Users. There has been an improvement in the overall performance of 91% from Apr-23 to 95% in Oct-23, and we would expect this would be even higher if it included the Jan-24 outcomes. From the DCC Oct-23 reporting, most Services (CSP C&S, S1 IOC, S1 MOC) are achieving over 96% success, with only CSP N (93%) and S1 FOC (90%) achieving low success. From our own reporting of the recent Mar-24 Price Change event, we have observed a success rate of c.96% across our	1) SECAS notes the omission of updated PCUE data, and will include this within future iterations of the Modification Report. 2) DCC believe improvements seen within existing data are a result of more users implementing the guidance issued by the DCC. It is noted that the January 2024 and April 2024 events were completed on bank holidays and so other network traffic is reduced e.g. install and commission activity. This results in an improved implementation of tariff changes but does not necessarily indicate greater performance of the event. 3) The PCUE impacts are across the DCC Total System, and are not limited to particular Service Providers. Other

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			portfolio – with the highest being 98.5% (in CSP C&S) and lowest being 85% (for SMETS1 FOC). Given discussions in SEC Operations Group, these results and broader performance issues related to CSP N and SMETS1 FOC are more indicative of fundamental problems within those services as opposed to the need for obligations on Users behaviour. Alongside this, we believe that the proposed solution would not effectively resolve the identified issue – and in fact has the ability to further exacerbate potential problems. The Future-Dating of Service Requests (particularly for SMETS2+ Devices) will significantly increase the volume of traffic through DCC Total Systems when compared to the number of messages required to achieve On-Demand Service Requests. When Service Requests are Future-Dated, it is only prudent to do a subsequent read to confirm that the prices have indeed been set correctly. When Future-Dated Devices will send up to 4 (for gas) and 6 (for electricity) 8F66/8F67 alerts on the back of every SRV1.1.1 Service Request. For a SMETS2 ESME, this means that for every Future-Dated change, DCC will be processing 1 Service Request/Response in advance (to set the future dated command), 1 Service Request/Response for a read on the day & an additional 6 alerts - as opposed to just 1 On Demand Service Request/Response.	changes to the SMIP are being implemented, but these would not solve the PCUE issues alone. 4) DCC consider that future dated strategy allows improved management of the event by allowing the load to be spread out. The requirement to issue FDC's also spreads the load. While overall total load in a given month may be higher, the load is smoothed during the Price Control Event. If a User sets up a Future Dated Service Request, it should not be necessary to carry out subsequent checks to make sure the Future Dated SR is set up correctly. The DCC would appreciate any evidence or cases Octopus found where FD SRs have not been set up correctly. 5) Information relating to the success levels of the January PCUE will be added, in addition to identifying how many Users followed the guidance. It should also be noted that recent PCUE have been completed on non-working days where system traffic and demand is lower and so the demand on DCC systems is lower.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			In addition, this modification refers to an issue that was most prevalent in January/April 2023 PCUEs, however similar issues were not observed on other PCUEs in October 2023, January 2024 or April 2024. In particular, as per Diagram 1 included in the Modification Report, it is clear that success rates have improved with every PCUE despite significant increases in Device numbers between each such PCUE. This happened despite the fact that 'Most Users did not follow the agreed process' (as the Modification Report states). This means that despite most Users not following the guidance suggested, improvements have already been made. Moreover, the PCID lacks clarity. There are contradictions within the draft PCID. Section 2.4 'Other credit consumers' states: For SRV 1.1.1 & 1.2.1 on the day of the PCUE: … Parties will evenly distribute the activation times of these SRVs over a minimum period of two and a half days beginning at 12:00 on the day after the PCUE. It is not possible for a User to begin at 12:00 on the day after the PCUE, while also on the day of the PCUE as the first clause of this section states. This same contradiction is present on Section 3.4. It is also not clear how this would apply to SRV1.1.1/1.2.1s that form a core part of the Install & Commission and Change of Supplier events which believe should not be subject to the rules of the PCID, although the DCC would have no means of being able to differentiate the Tariff/Price updates as part of an Installation and Commission and/or Change of Supplier	6) Some users have been able to implement guidance which has allowed the PCUE to run more smoothly over time. DCC consider that it is appropriate to require all Parties operate under the same constraints and that it is not appropriate to allow a subset of users to take these actions while others do not. If all users follow the guidance, and where it is clear the guidance can be relaxed, DCC would look to amend the requirements as much as possible. 7) DCC notes the comments in relation to the proposed legal text, and will clarify and correct the guidance text where appropriate. 8) The DCC notes that the Guidance only applies to PCUE-related activities and commands, and that DNOs, Other Users, and I&C related activities are not included in the Guidance, the rules are not intended to require changes to I&C actions or top-ups. This will be added to the legal text.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			event (noting that there are Supplier Licence Condition obligations that require Suppliers to provide demonstrations of equipment with Customer data, i.e., the correct tariff/price values). By way of example, the PCID states that 'non-critical activities must be suspended during PCUE's.'. 'non-critical activities' is not defined, so it is difficult to know exactly what should be suspended. If it is assumed that this means Non-Critical Service Requests, then this presents many more problems. Request such as top-ups (SRV2.2) are 'non-critical', yet these will also still be needed on PCUE days. Likewise, install and commission related requests are also Non-Critical – 1. Are these supposed to be suspended on PCUE days too? 2. In addition, this statement says "during PCUE's" – when is the defined end of a PCUE?	9) The scope and context of the Guidance will be clarified in the legal text as noted above.
National Grid Electricity Distribution	Network Operator	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Operator	Yes	The solution put forward will resolve the issue identified however as a Network Party we would want to understand how DCC will be supporting us in continuing to invoke schedules as per our current arrangements on data gathering during Price Change events as ongoing data collection is critical.	Network Operators are out of scope for the PCID. If DNOs believe they are impacted during a Price Change event, they should contact DCC with the details directly. SSE Networks have provided details of the issues they encountered to the DCC.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
				Other Network Parties should also pass these on if they experience issues.
Utilita Energy Ltd	Large Supplier	Yes	We believe that the approach of having user guidance become a SEC Required Document is the most effective method of enshrining this obligation within the SEC, while at the same time not making it over onerous to modify as the Smart infrastructure develops and changes over time.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	NPML were supportive of the guidance when it was first generated, and making that behaviour mandatory will lead to reduced network traffic during price control events, and reduce the likelihood of emergency call outs occurring where consumers fail to vend in prepayment mode due to the smart metering network.	-
E (Gas and Electricity) Ltd	Small Supplier	No	1.The impact of the issue is significantly overstated. In the proposal the issue is described in terms of impacts in the January 2023 price change: however since then there have been 4 further price change events each with reduced impact. 2.Current guidance lacks legitimacy as not all Users were consulted at the outset. The proposal states that 'DCC collaborated with Users during the summer of 2023' – however small suppliers were NOT invited, so the resulting guidance does not include their views, their specific customer profiles and capabilities. The current guidance has the potential to cause detriment to Prepayment Consumers if strictly enforced. Specific issues with the current guidance include:	Please also see responses outlined to Octopus Energy in Question 1. 1) Some users have been able to implement guidance which has allowed the PCUE to run more smoothly over time. DCC consider that it is appropriate to require all Parties operate under the same constraints and that it is not appropriate to allow a subset of users to take these actions while others do not. If all users follow the guidance, and where it is clear the guidance can be amended, DCC would look to relax the requirements as much as possible.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			(a) The day one 00:00-05:00 window for processing SRV 1.1.1 & SRV 1.2.1 is good for large suppliers with high SR throughput and a low proportion of prepayment customers, but does not work for smaller suppliers with lower SR throughput and a higher proportion of prepayment customers requiring a much wider prepayment window. (b) Advice to 'Use Future Dated (SMETS1) SRV 1.1.1 & 1.2.1 where possible' has a number of drawbacks: a. in the past DCC/DSP has failed to control the release of Future Dated (SMETS1) SRV 1.1.1 & 1.2.1 leading to overload during a price change event; and b. in future, if Device Future Dated is implemented for SMETS1 (see MP247) the advice to use future-dated SRV 1.1.1 & 1.2.1 is likely to be in direct conflict with the need to prove Device Future Dated at a scale smaller than 'price change sent to all SMETS1 devices'. 3. Future guidance would also lack legitimacy: the proposal only requires DCC and SEC Panel to collaborate on new versions of PCID. There will be no direct representation for certain Users in this process (eg small suppliers without their own representative on SEC Panel), with the possibility that issues like 2(b).b might be overlooked..	2) Details of the January 24 PCUE will be supplied, as will any future details where possible. 3) Note that the January event was a bank holiday and so the DCC expect better performance. 4) DCC engaged with SEC Operations and Panel – both of which have small supplier representation. 5) DCC consider that the current guidance protects the service, and has specifically designed the guidance with prepayment vend in mind. 6) If MP247 is approved and implemented, the Guidance would be reviewed. This however is not likely for a significant number of future PCUEs.
EDF Energy	Large Supplier	Yes	If enforced industry wide, we believe it should resolve the issue. However, the data from recent price change events suggests there have been no significant problems,	The last two PCUEs were on bank holidays where traffic is lower with no significant I&C activity. Some users have

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			indicating the current system of guidance rather than regulation has been successful. Therefore, implementing this modification appears unnecessary, whilst creating costs and burdens to suppliers in the process. Though, this modification may work, we believe there are better approaches to ensuring the efficient and successful running of price change events.	been able to implement guidance which has allowed the PCUE to run more smoothly over time. DCC consider that it is appropriate to require all Parties operate under the same constraints and that it is not appropriate to allow a subset of users to take these actions while others do not. If all users follow the guidance, and where it is clear the guidance can be amended, DCC would look to relax the requirements as much as possible.
British Gas	Large Supplier	Yes	It seems a sensible step to take, as one part of the wider effort to manage traffic around the price change events. We think it should be approved as a modification, but shouldn't be the sole remedy to sorting out the issue.	-

Question 2: Do you agree that the legal text will deliver MP253?

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Yes	N/A	-
Octopus Energy Ltd	Large Supplier	No	The modification report states "The DCC do not intend to introduce consequences for non-compliance as part of this modification.". However, the legal text seems to contradict this statement and even uses the terminology 'obligations' which we believe could be enforced as an 'Event of Default' at a future date with the current legal text wording. This is reiterated in clauses 21.2-21.4 from the draft legal text, which appears to be circular in that they require a Party to comply with the provisions of the PCID even if a User has notified the DCC and the SEC Panel that it would not be possible to do so. It is not clear whether this text has been through formal legal review. In addition, the drafting of the PCID is inadequately clear to facilitate the outcomes desired. One example of many is the lack of definition for 'non-critical activities' referenced in the answer to Question 1, and the contradictions within the document (also referenced above). We do not believe it is appropriate or reasonable to impose obligations on Users such as this. We believe this goes against the intent, design, and approach to Smart Metering, which was to enable Users the flexibility to	1) The DCC does not intend to introduce consequences for non-compliance as part of this modification. DCC does not have the authority to introduce any consequence for failing to follow the requirements. 2) DCC and SECAS will review the corresponding legal text. This line is added so that other appropriate action can be considered that could benefit the industry wide process, while trying to make it clear that a party should not be able to remove their obligation to follow the rules through notification. 3) Note the response to the "non-critical activities" above. The legal text will be clarified. 4) The DCC system was not designed with such large-scale events in mind. It is

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			design business processes and orchestrations that was appropriate to them rather than force Users to send specific Service Requests for business processes and via a specific 'Mode of Operation'. We believe it would be more appropriate that this was a DCC Guidance document (similar to the documents on the 'Design Notes and Interim Approaches') rather than obligated means of executing a business process.	therefore appropriate to consider how these events should be managed. 5) DCC would welcome information, from Parties who do not have an orchestration that would allow them to follow the guidance, on what actions they could take to support the wider industry through PCUE.
National Grid Electricity Distribution	Network Operator	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Operator	Yes	The legal text will deliver MP253, however as a Network Party we would need to understand how DCC will support and manage our scheduled traffic during the price change events as this is not detailed in the PCID.	As noted previously within the document, Network Operators should not be impacted by the Guidance, but should contact the DCC directly with details if they feel impacts are likely.
Utilita Energy Ltd	Large Supplier	Yes	No further comments.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	No	1. The draft legal text does not allow fair representation for all Users in initial PCID or the PCID consultation process.	1) Note the DCC comment above regarding the origin of the Modification, as well as the engagement with SEC parties

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			2. The legal text (21.3/21.4) assumes that Users will be in breach of 21.2. This is actually a reasonable assumption given that parts of the existing guidelines are either unachievable or unsuitable in certain circumstances – but what is the point of SEC provisions that force users to be in breach for taking the most appropriate actions in the interests of the end user consumers?	through the Working Group and other governance. The development of the initial PCID is following agreed modification process and where all users are free to feed into that process and respond to consultations. Future changes would be processed through DCC industry wide consultation and require further approval by SEC Panel. Standard practice would also see changes presented to the Operations Group. DCC consider that this standard approach gives ample opportunity for all impacted parties to engage and feed into any changes. 2) Clauses 2.13 / 2.14 within the legal text is intended to alert DCC that a user cannot follow the guidance and to what extent – the impact can then be assessed. Other actions could then be considered that the user can implement to help provide benefit to the wider industry. If approved Parties should implement the requirements.
EDF Energy	Large Supplier	Partially	The text appears sufficient, however it is imprecise as there is no definition of 'critical/non-critical' activities.	As noted above, this will be updated.
British Gas	Large Supplier	No	We are concerned over the last sentence of 21.4, which reads "For the avoidance of doubt, a notice given by the	1) As noted above, changes to the legal text will be considered. Supplier Parties

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			User under Clause 21.3 shall not relieve the User from its obligations under Clause 21.2." This means that any Supplier who issued a notice under Clause 21.3 would be in breach of Elec SLC 48.1(b) and Gas SLC 42.1(b). Suppliers are not going to be able to accept this change if it puts them in breach of their supplier licence. There needs to be a different approach taken in the drafting.	should need to implement the rules, and a notification that they cannot, should not remove their obligation. DCC does not consider that Suppliers would be in breach. 2) The requirement to inform DCC that the rules cannot be followed does not impact on a Suppliers ability to follow them, and it does not cause the non-compliance. This line is intended to ensure DCC is aware that a Pary cannot follow the rules so that additional actions might be taken to manage the price control event, including engaging with the Party to see what they could do to help provide the wider industry benefit.

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

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Yes	N/A	-
Octopus Energy Ltd	Large Supplier	No	No, this gives Users little to no time to implement changes. Should the suggested guidance be implemented in the June 2024 SEC Release, this would leave Users in the position that they could be in breach of their new SEC obligations just 4 days after the SEC Release seeing as there is a Price Change event on 1st July 2024. This is not fair or appropriate to impose such short timescales on Users and would arguably be hypocritical to do so given that changes to the DCC system are often not included in SEC Releases for 12 months+ from agreement on solution.	SECAS have indicated this will no longer be part of the June 2024 SEC Release. DCC will either implement a lead time for the implementation of this proposal if approved, or establish a period of exemption from non-compliance.
National Grid Electricity Distribution	Network Operator	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN agree with the implementation approach.	-
Utilita Energy Ltd	Large Supplier	Yes	We agree that having this implemented as soon as possible is advantageous, however, we note the desire in the modification report to have this guidance in place for the July Price Cap Update Event. Users would therefore require advance sight of the instruction to make required	See response to Octopus Energy in Question 3.

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			system changes and\or notify the DCC of their inability to comply.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	No	Because we do not agree that the solution put forward will effectively resolve the identified issue	-
EDF Energy	Large Supplier	No	We have discussed this with our DCC adaptor provider, and a June release would not leave sufficient time to implement the systems changes before the summer price change event.	See response to Octopus Energy in Question 3.
British Gas	Large Supplier	Yes	We aren't clear as to whether inclusion in the June 2024 SEC Release means this would govern the 1st July Price Cap event or not. The obligation to give a month's notice of any issues (in Clause 21.2) would only take effect on 27th June, but that would only give 4 days notice ahead of 1st July.	See response to Octopus Energy in Question 3.

Question 4: Will there be any impact on your organisation to implement MP253?

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	No	N/A	-
Octopus Energy Ltd	Large Supplier	Yes	In order to implement MP253, system processes will have to be completely overhauled to be in line with the current draft PCID. Currently all price changes updates are completed via a steady, slow stream of On-Demand SRV1.1.1 Service Requests (starting with prepayment customers before moving onto all credit customers). Requests for Credit customers would need to be broken into billed on PCUE date, billed on day after PCUE date and other credit customer cohorts, before creating future-dated requests to be actioned on the days prescribed by the PCID. This creates an ongoing impact in terms of data sourcing and maintenance in order to keep this information up-to-date for any future PCUE. In addition to this data maintenance, there will be a necessary focussed piece of development required in order to bring our internal solution in line with the PCID. This will incur a significant implementation effort on multiple systems – the ones that generate the Service Requests and the ones that'll process the Service Requests. These are two segregated, distinct systems which both would need changes (to produce Service Requests with appropriate ExecutionDateTime fields, to process these Service Requests well in advance of the	1) DCC have noted in the Guidance specific recommendations for use of SRV 1.1.1 and SRV 1.2.1 as particularly the former have a significant impact on system performance during a PCUE. DCC will review this feedback, and consider changes to the Guidance. 2) The proposed Guidance was designed partially in mind of the need to protect I&C and prepayment activity, whilst excluding it from PCUE implications.

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			PCUE, to implement the recommended use of SRV1.2.1 in lieu of the currently used SRV1.1.1, amongst multiple other development activities). These are significant changes that require significant development effort, which have not been factored into any planned development activity. It is not clear whether this proposed solution has taken account of the need to manage on-going industry processes, during PCUEs, such as Install and Commission or CoS Gains (where tariffs are required to be set).	
National Grid Electricity Distribution	Network Operator	Yes	We believe there will be impact to our organisation for reasons stated in the Modification Report.	The Guidance has been designed to not impact the DCC Total System for DNOs.
Scottish and Southern Electricity Networks	Network Operator	N/A	We believe SEC MP253 will impact SSEN as we have observed through the April 2024 Price Change Event where some scheduled service requests were delayed. As a Network Party we would need to understand if there are any proposed changes to how schedules are undertaken in the future during a PCUE as this is not detailed in the PCID.	We have requested details on the impacts and will review any supplied information.
Utilita Energy Ltd	Large Supplier	No	No impact from the modification itself, however, depending on the instructions contained within the initial document there may be impacts from those.	-
Northern Powergrid Metering Limited	Other SEC Party	No	N/A	-

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E (Gas and Electricity) Ltd	Small Supplier	Yes	No implementation effort – we are already doing everything that can be practically done within the guidance. Price change processing for prepayment customers after the day one 00:00-05:00 prepayment window could be negatively impacted depending on how other users react to the MP253 changes.	-
EDF Energy	Large Supplier	Yes	Within our new DCC adaptor, we currently do not have the ability to send future dated commands/price change commands at specific times. Therefore, being obliged to follow the DCC guidance to send future dated commands, would require system changes. Additionally, any changes may require additional ongoing manpower to manage the deployments on the day.	-
British Gas	Large Supplier	Yes	It would formalise the efforts we currently put in place to support the Price Cap events.	-

Question 5: Will your organisation incur any costs in implementing MP253?

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	No	N/A	
Octopus Energy Ltd	Large Supplier	More than £1m	We cannot at this stage accurately predict the final cost of such significant system changes. Implementation effort alone will require significant work (as per Question 4), and these changes have associated costs. The production of the data required for future PCUE will also incur costs. Neither can we determine the addition operational cost that this change will incur. For example, the PCID mandates that, for Credit customers who are not billed on either PCUE or the day after PCUE, Users 'will evenly distribute the activation times of these SRVs over a minimum period of two and a half days beginning at 12:00 on the day after the PCUE'. This means that some customers will not have their prices updated for up to 4 days from midnight on the day of the PCUE. We foresee significant costs to be incurred due to our service centre staff fielding queries from a great number of customers, asking why their smart meters are reporting inaccurate costs. We see this having significantly more impact on the PCUEs where customer costs should be reduced (such as the one that has just occurred, April 2024). As a result of this modification there are no cost-savings that are foreseen. There are no costs incurred as a result of this modification not being implemented. It is also difficult to predict future costs given that the PCID itself could be changed by a consultation and SEC Panel	The DCC will work with SECAS to establish any potential costs across the industry related to the potential implementation of this modification. The proposed governance of the Code Required Document is in line with other established Code Required Documents.

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			approval which we do not believe is an appropriate governance mechanism for an obligated process document that could have broad User System implications.	
National Grid Electricity Distribution	Network Operator	No costs	N/A	-
Scottish and Southern Electricity Networks	Network Operator	No costs	We believe no system changes are required.	-
Utilita Energy Ltd	Large Supplier	No costs	No costs from the modification itself, however, depending on the instructions contained within the initial document there may be costs from those.	-
Northern Powergrid Metering Limited	Other SEC Party	No costs	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	No	We are already doing everything that can be practically done within the guidance.	-
EDF Energy	Large Supplier	Unknown	TBC, the DCC adaptor provider would make the changes for us, but there may be additional direct costs to EDF energy. Even if there are no direct costs to implement the change, there will be an opportunity/operational cost as our DCC adaptor supplier will have to focus on implementing the change, rather than prioritising	-

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			operational improvements that directly benefit day-to-day work.	
British Gas	Large Supplier	No costs		-

Question 6: How long from the point of approval would your organisation need to implement MP253?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Minimal time to implement	N/A	-
Octopus Energy Ltd	Large Supplier	6 months – 1 year	Assuming there is a point of approval, to which we object, the change would result in significant development across multiple teams. Such changes must also be appropriately prioritised, before being scheduled in an already busy development cycle. This would force us to de-prioritise other scheduled work to improve ongoing customer experience.	SECAS and DCC note the comments provided.
National Grid Electricity Distribution	Network Operator	None	N/A	-
Scottish and Southern Electricity Networks	Network Operator	N/A	N/A	-
Utilita Energy Ltd	Large Supplier	No lead time	No lead time from the modification itself, however, depending on the instructions contained within the initial document there may be required system changes and associated lead time from those.	-

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Northern Powergrid Metering Limited	Other SEC Party	No lead time	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	No lead time to implement	We are already doing everything that can be practically done within the guidance.	-
EDF Energy	Large Supplier	TBC	This is dependent on our 3rd party DCC adaptor provider, and we would need to discuss timelines with them in detail. However initial conversations suggest that some of the changes required might be complex and therefore take some time – in excess of 6 months.	-
British Gas	Large Supplier	1 month	We are unclear if the change is meant to be ‘live’ for the 1st July Price Cap event or not.	This modification will no longer be within the June 2024 SEC Release, and dates will be re-established as the modification develops.

Question 7: Do you believe that MP253 would better facilitate the General SEC Objectives?

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Yes	Better facilitates SEC Objectives (a) and (c)	-
Octopus Energy Ltd	Large Supplier	No	We do not believe it will better facilitate General SEC Objective (a), noting our rationale in Question 1. We believe that this solution will increase traffic traversing DCC Total Systems, on PCUE day and the days that follow. Furthermore, it would seem that this solution is counter to General SEC Objective (c). Though it is not clear from the drafting of the PCID, it seems that the solution requires the overwhelming majority of credit customers to wait up to 4 days for their smart meters to accurately reflect their current price of energy. This would seem to contradict General SEC Objective (c), which facilitates "Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information" – DCC Users would effectively be forced to withhold 'appropriate information' from Energy Consumers' under the proposed solution. In addition, the proposed solution would appear to also stifle effective competition between Supplier's (and is thus counter to General SEC Objective (d)). While it is, of course, most important that Pre-Payment consumers get their prices updated at the earliest opportunity (and that no PCUE affects their ability to add credit) the proposed solution would appear to benefit those Supplier's whose customer bases are largely Pre-Payment. Under the	1) DCC consider that the rules will result in a smoother, overall more efficient implementation of price events. 2) Unfair competition arguments can be found in allowing some Users to implement the current guidance to support the wider industry while others do not. And so, it may be fairer to competition to mandate the guidance.

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			proposed solution, Pre-Payment prices are updated on day of PCUE, whereas Credit is much more spread-out. We believe this will lead to disproportionately more complaints, due to inaccurate price information, for Suppliers with larger Credit customer portfolios (hence limiting competition).	
National Grid Electricity Distribution	Network Operator	Yes	We believe this modification would better facilitate General SEC Objectives for reasons stated in the Modification Report.	-
Scottish and Southern Electricity Networks	Network Operator	Yes	MP253 will better facilitate General SEC Objective (a) as it will support efficient operation of Smart metering Systems, achieved by managing DCC Total System traffic and reducing demand.	-
Utilita Energy Ltd	Large Supplier	Yes	We believe that this modification will have positive impacts on SEC Objectives (a), (b) and (c), as this will reduce the impact Price Cap Update Events will have on the DCC network, allowing critical traffic to flow through and tariff updates to land on devices as soon as possible.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	Improving the resilience of the smart metering network by introducing good practice and mandatory behaviours will help better facilitate objectives A and C. Reduced network traffic will allow suppliers to better manage the smart metering systems, and consumers will see a reduction in failures to top up during price control events, allowing them to better manage their own energy consumption.	-

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E (Gas and Electricity) Ltd	Small Supplier	No	There is no evidence of significant benefits given improvements in price change performance since January 2023 without MP253 in place. In addition there are downsides to MP253 in certain circumstances.	Please note that some Parties follow the guidance and recent events have been on non-working days – which has helped to manage the price event. However, all users should be required to work in the same manner.
EDF Energy	Large Supplier	No	Customers should be able to view price changes as soon as they happen, they should not be inconvenienced by the limitations on the DCC infrastructure. Delaying the price change by even 1 or 2 days for some customers goes against the General SEC objectives. Additionally, mandating suppliers utilise the same method for applying price change events limits supplier choice and creates an impediment to innovation, potentially stifling competition between suppliers of energy in the process.	DCC notes that some Users may see a delay in updates but the changes protect prepayment customers and ensure an overall smoothing of traffic and increased efficiency. Unfair competition arguments can be found in allowing some Users to implement the current guidance to support the wider industry while others do not.
British Gas	Large Supplier	Yes	We agree it should better facilitate General SEC Objectives (a) and (c).	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP253 is implemented?

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Yes	Minimising any potential delay in communication being sent to Smart meters would benefit consumers.	-
Octopus Energy Ltd	Large Supplier	Yes	Consumers will be impacted if MP253 is implemented, since the majority of them will have inaccurate tariff prices reflected on their Devices, potentially for a number of days after the PCUE. We would also disagree with the statement in the Modification Report that SRV2.2 would benefit from this modification by being “less likely to fail when submitted to the DCC System during a PCUE as a result of decreased traffic volumes.” – we believe that other modifications such as those related to the prioritisation of system messages/service requests would resolve the challenges outlined and that recent Price Change events have not resulted in the service becoming unavailable so we believe this benefit is exaggerated.	1) The DCC notes the comments in relation to consumer impacts. 2) Other Modifications, potentially relating to Northbound and Southbound Prioritisation are only likely to positively impact Prepayment customers requiring Top-ups and are less likely to positively impact the PCUE.
National Grid Electricity Distribution	Network Operator	Yes	We believe that consumers will be impacted for reasons stated in the modification report.	-
Scottish and Southern Electricity Networks	Network Operator	Yes	We will better understand impacts depending on how we will be supported by DCC and what options are available for us to be able to continue to gather data as usual.	-

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Utilita Energy Ltd	Large Supplier	Yes	From a PrePay perspective, the instructions enabled by this modification are critical to ensuring the tariff updates are delivered to PrePay customers in as timeous a manner as possible following a Price Cap Update Event, as this has a material impact on the prices a PrePay customer pays in real time, so any delay in updating the tariff details can have a material impact on the customer experience and require billing adjustments.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	Consumers will experience less failures to vend during price control events, and this will lead to a more stable supply of energy to the consumer's property.	-
E (Gas and Electricity) Ltd	Small Supplier	No	There is no evidence of significant benefits given improvements in price change performance since January 2023 without MP253 in place. In addition, there are downsides to MP253 in certain circumstances, including downsides for prepayment consumers.	The DCC believes the instructions issued would likely benefit Prepayment customers positively as it ensure a higher success rate of messages.
EDF Energy	Large Supplier	Yes, but not significant impacts or benefits	It may protect some PAYG customers from delays, but other customers may have to wait longer for their new prices to be displayed on their IHDs.	Noted that Parties credit customer updates may take longer and that Parties are responsible for engaging with their customer base.
British Gas	Large Supplier	No	Not clear. Consumers should benefit from smoother running of the traffic flows around price cap events, however some credit consumers will have a negative experience if their IHD is still showing the old prices on the day of the price event. Energy prices are a key topic for consumers, and the price cap change is heavily	The DCC notes the provided comments.

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			covered in the press and news on the day. It could cause consumer concern and anxiety (and 'wasted time' if they rush to contact their suppliers etc) if they think the price change has not taken effect on their meter.	

Question 9: Noting the costs and benefits of this modification, do you believe MP253 should be approved?

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
E.ON	Large Supplier	Yes	Introduction of a standard consistent process applicable to Users is beneficial.	-
Octopus Energy Ltd	Large Supplier	No	As noted throughout this consultation, the costs of this modification would appear to be high to the User, and the benefits non-existent (to the User and the consumer). The proposed solution would appear to slow the update of information to consumers, in a technical age where updates should be quick and painless. The business case for change notes that 'DCC System has suffered because of higher-than-expected traffic volumes' – we'd counter that by saying the traffic volumes were entirely expected. DCC consulted with User's prior to previous PCUEs and knew exactly what volume of traffic was to be expected. DCC Systems have suffered as they are not able to handle the volume of traffic which is required; yet it is not the responsibility of Supplier's to manage this on DCC's behalf. We are also concerned that the powers provided by the PCID effectively give DCC the ability to control how Supplier's engage with their own customers and manage their smart meter estate.	The PCID would be initially agreed through the standard MOD process and in the future through industry consultation and Panel approval. It is not the intent that DCC controls Party engagement with their customers or their smart meter estate. The document is designed to protect prepayment activity and to result in a more efficient implementation of the price event which should benefit all customers.

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
National Grid Electricity Distribution	Network Operator	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Operator	N/A	We believe once we have confirmation on how this will impact us as a Network Party that this modification can be approved as long as we are properly supported and not impacted negatively during these price change events.	The requirements of the current PCID are supplier impacted only. If implemented the managed demand should benefit all Users.
Utilita Energy Ltd	Large Supplier	Yes	The benefits that could be realised by this modification outweigh the potential costs, therefore we believe this modification should be approved and implemented as soon as possible.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	No	There is no evidence of significant benefits (refer to April 2024 price change feedback from DCC – to be published).	-
EDF Energy	Large Supplier	No	It should not be the responsibility of suppliers to manage the traffic into the DCC. The DCC needs to be responsible for its own traffic management and if it needs to upgrade the infrastructure to deal with the additional traffic at price change events then it should do that. Additionally, the time taken and the potential costs (both financial and operational) to implement this change, do not lead to any real benefit to either suppliers or to the end consumer.	We have investigated the costs of carrying out such an update to the infrastructure, and while feasible, it would be a significant expense, and would not be deemed value for money for an event occurring once every three months. This Modification was raised to specifically try and avoid such expense.

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
British Gas	Large Supplier	Yes	It seems to be required. We would want the legal text changing however, to not risk putting Suppliers in breach of their Energy Licence.	DCC consider that removing the requirement to notify that the rules cannot be followed does not impact on a Parties compliance.

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

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
E.ON	Large Supplier	The Price Control Instructions Document (PCID) does not outline what would happen in the event of a DCC incident or outage affecting key systems which would impact Price Cap Update Events, i.e., is everything shifted forward by 'x-hours'?	The DCC notes the provided comments.
Octopus Energy Ltd	Large Supplier	We disagree that there is a sufficient business case to justify giving the DCC the level of control/direction suggested and are very concerned by the precedent that a modification such as this could set. We believe the engagement over the last year that the DCC and SEC Sub-committees have undertaken has proven sufficient to ensure the Price Change events are undertaken efficiently without imposing controls on Users. We believe that the PCID is not adequate or clear enough to be justified as a code required document that Users are obligated to comply with. The level of detail and quality in information between this document to the Technical Specifications (SMETS, GBCS, DUIS etc) or a document such as the 'Power Outage & Restoration Alerts Delivery Management Document' is so significant that we do not believe this provides sufficient information to enable Users to confidently comply with. There are known and observed issues with installed Devices do not appear to have been considered anywhere in the proposed solution. There are a number of Devices whose clock time has drifted away from actual time. When you send a Future-Dated request to a SMETS2 Device, it is executed based on what time the Device believes it to be. The real-world consequence of this is that the Future-Dated price change is actioned at a somewhat random time. This could be of detriment to the consumer, in particular those in Pre-Payment mode. If	1) The rules are to be generated in collaboration with Parties to agree the best way to manage system demand during price events. DCC do not consider that these rules provide DCC with "control". 2) DCC offer to work in workshop setting to discuss the document and make amendments if required. Further clarity required to understand concerns. 3) Suppliers can send SR to update the internal clock of meters.

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
		the Device's clock has drifted to an earlier time, sometimes by a number of hours, this will mean that prices will change earlier than expected. On PCUEs where prices go up, this will mean that consumers will be paying more for their usage earlier than they should be. This issue does not exist with On-Demand Service Requests.	
National Grid Electricity Distribution	Network Operator	N/A	-
Scottish and Southern Electricity Networks	Network Operator	N/A	-
Utilita Energy Ltd	Large Supplier	The original intent of the modification is to improve performance across the system around these critical events, not to provide additional means to penalise users, and while penalties have not been mentioned as yet, we feel it necessary to reiterate this point for enduring clarity.	-
Northern Powergrid Metering Limited	Other SEC Party	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	N/A	-
EDF Energy	Large Supplier	Whilst we agree a form of engagement with DCC in the lead up to mass price change events should exist we don't agree that specific rules should be mandated to mitigate the need for DCC to manage traffic on the network effectively.	-

Question 10			
Respondent	**Category**	**Comments**	**SECAS Response**
		We also believe that mandating price change activity removes our ability, as a supplier, to determine how best to update our customers devices and service their needs.	
British Gas	Large Supplier	Two further comments: Firstly, the DCC need to undertake regular reviews of the document, to check it is still correct in its approach as time passes. For example, is the 12-5am Prepayment window sufficient (based on a now out of date number of Prepayment meters), or does it need to be extended to 6.30-7am? Secondly, the proposed document places all the obligations on Suppliers and what Suppliers need to be doing. There should also be obligations on the DCC and its providers, who should also be trying to mitigate the traffic volume issues. This is probably obvious, and the DCC and its providers will be doing this anyway, but this should be reflected in the proposed document, which otherwise seems very one-sided.	1) Regular reviews will be carried out in conjunction with OPSG. 2) The DCC notes the comments and will amend the legal text to reflect this.