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MP253

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

Modification Report

Version 1.0

18 September 2024

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has four annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the proposed Code Required Document, the 'Price Cap Instructions Document' (PCID).
- **Annex C** contains the responses received to the first Refinement Consultation.
- **Annex D** contains the responses received to the second Refinement Consultation.

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1. Summary

This proposal was initially raised by Utilita Energy and was then adopted by David Rollason of the Data Communications Company (DCC) on 2 November 2023.

Since October 2022, Ofgem has revised its Energy Price Cap on a quarterly basis. These revisions require Energy Suppliers to adjust their tariffs accordingly, with any changes being effective from the first calendar day of the quarter. These events are required to update the tariffs of all installed Smart Meters and result in high volumes of Service Requests (SRs) being sent by Suppliers across the DCC Total System. This increased traffic peak has caused both major incidents and significant increases in retry volumes and failure rates, which have ultimately resulted in the application of some price changes being delayed for both prepay and credit consumers. The majority of incidents leading to this issue occurred in 2023. There have been fewer incidents and issues that have arisen in 2024, largely due to increased DCC resources attributed to these events, alongside 2024 Price Cap Update Events (PCUEs) regularly taking place on non-working days which has the effect of reducing System traffic.

There are no formal rules or requirements in the SEC on how Users should behave in such high volumes of traffic events. Therefore, there is no standard process for the execution of such industry-wide PCUEs, either within the Supplier community or through DCC systems. The DCC collaborated with Users during the summer of 2023 to agree an approach in relation to PCUEs. The aim was to limit the impact of these events, and therefore User 'guidance' was drafted by the DCC, and endorsed by the SEC Panel, to Users in July 2023. This guidance was not enforceable, meaning the guidance could be ignored or abused.

If delays to the processing of messages continue during a PCUE, consumers could be affected. If tariff or price changes to a Device are delayed, and tariff details are not amended to the correct values, the possibility of a consumer being charged incorrectly for their consumption increases. The DCC would like to place the current 'guidance' issued during a PCUE into a Code Required document called the 'Price Cap Instructions Document' (PCID) and place an obligation on Users to follow the instructions.

This modification would impact Suppliers, the DCC and Other SEC Parties. Costs would be limited to that of Smart Energy Code Administrator and Secretariat (SECAS) implementation costs. Suppliers have noted potential large consequential costs, depending on the specifics of the instructions. This modification is targeted for the November 2024 SEC Release and will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

Since October 2022, Ofgem has revised its Energy Price Cap on a quarterly basis. These revisions require Energy Suppliers to adjust their tariffs accordingly, with any changes being effective from the first calendar day of the quarter. These events are required to update the tariffs of all installed Smart Meters. These events result in high volumes of SRs being sent by Suppliers across the DCC Total System.

A Supplier may send Service Reference Variant (SRV) 1.2.1 'UpdatePrice' to a Device, looking to change aspects such as Tariffs and Standing Charge. Suppliers typically do this in bulk, causing an influx of SRs being sent to the DCC Total System, possibly leading to DCC Total System capacity breaches and queuing of messages when combined alongside the activity of other DCC Users.

The SEC Panel has previously endorsed non-mandatory guidance written by the DCC to Users in anticipation of these events. This guidance has been centred on how to support the DCC manage system traffic during these events with recommendations of 'best practice' when sending system messages. This may include the practice of scheduling requests for the future to help alleviate the stress on the DCC System.

There have been various incidents that have occurred during PCUEs in 2023 relating to performance of SRs. During the January 2023 PCUE the high volume of traffic passing through the DCC System caused 1.6m errors to be returned to DCC Users when trying to process requests. During the July 2023 PCUE, there were two major incidents. Both incidents were caused by higher than anticipated volumes of requests being submitted which resulted in significant delays over several hours.

During the summer of 2023, the DCC worked with Users to agree an approach to limit the impact of PCUEs and issued User guidance. Though there was general agreement on the requirement and the approach, most Users did not follow the agreed process.

System performance during 2023 PCUEs is shown below as part of Table 1:

Cohort	April 2023		July 2023		October 2023	
	Devices targeted	Success rate	Devices targeted	Success rate	Devices targeted	Success rate
Overall Performance	17.2m	91%	19.7m	93%	20.4m	95%
CSP N	2.7m	93%	2.9m	93%	3.1m	93%
CSP C&S	8.5m	95%	9.0m	96%	9.4m	96%
IOC	1.7m	98%	2.0m	97%	2.2m	97%
MOC	2.5m	76%	3.2m	93%	3.0m	98%
FOC	1.7m	78%	2.5m	81%	2.8m	90%

Table 1: Price Cap Update Event Success Rates in April, July, and October 2023

During 2024, there has been significantly fewer incidents and issues occur as a result of a PCUE. The DCC have noted this may be due to PCUEs taking place on non-working days, and more resource being attributed by the DCC to manage the fluctuating system traffic.

System performance during 2024 PCUEs is shown below as part of Diagram 2:

Cohort	January 2024		April 2024		July 2024	
	Devices targeted	Success rate	Devices targeted	Success rate	Devices targeted	Success rate
Overall Performance	21.6	95.8%	20.6m	95.6%	21.3m	95.7%
CSP N	3.3m	93.3%	3.2m	93.3%	3.3m	93.1%
CSP C&S	9.8m	96.1%	9.6m	97.1%	10.0m	97.3%
IOC	2.3m	96.4%	2.0m	95.0%	2.1m	95.5%
MOC	3.2m	98.0%	2.9m	96.1%	3.1m	97.8%
FOC	3.0m	91.0%	2.8m	90.7%	2.8m	91.0%

Table 2: Price Cap Update Event Success Rates in January, April and July 2024

During 2023, PCUE performance averaged at a 93% success rate. During 2024 so far, PCUE performance averaged at a 95.7% success rate, indicating a clear increase in performance success of 2.7% across a larger number of Devices impacted. However, the remaining 4.3% equates to a total of 2.8m Devices that were unsuccessful in their message attempts.

What is the issue?

There are no formal rules, or requirements in the SEC, on how Users should process such high volumes of traffic. Therefore, there is no standard process for the execution of such industry-wide price events, either within the Supplier community or through DCC systems. As such, the mass running of these quarterly price events across the entire Supplier community, focused predominantly on a single day for a six-hour period, has resulted in unpredictable and uneven peak traffic patterns into DCC systems. These behaviours have in turn caused issues in DCC systems and has led to more DCC resource being diverted to PCUEs.

What is the impact this is having?

This increased traffic peak has caused both major incidents and significant increases in retry volumes and failure rates, which have ultimately resulted in the application of some price changes being delayed for both prepay and credit consumers.

When periods of high traffic occur within the DCC System, there is a possibility that Supply impacting SRs could be adversely impacted. Each SR will have an associated Target Response Time (TRT), which is the expected time it will take the DCC process the SR from its original source.

Impact on consumers

Consumers whose Devices are impacted by SRs sent during periods of high traffic within the DCC System could be affected in multiple ways. One example could relate to the tariff or price changes to a Device, as if these details are not amended to the correct values, the possibility of a consumer being charged incorrectly for their consumption increases. Another example could be a DCC User attempting to send a Supply impacting SR, such as SRV 2.2 'TopUpDevice', a delay in the SR being processed could lead to the Supply suffering from temporary loss of power.

3. Solution

Proposed Solution

The DCC would like to place the current 'guidance' issued during a PCUE into a Price Cap Instructions Document (PCID) and place an obligation into the SEC on Users to follow provided instructions. Should these instructions require changes in readiness for future PCUEs, the proposed amendments would be consulted upon by DCC before seeking approval from the SEC Panel. If Users were unable to adhere to certain instructions, they must contact the DCC one month in advance of the relevant PCUE to establish alternative instructions.

The redlined changes to deliver the Proposed Solution can be found in Annex A, and the PCID can be found in Annex B.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
✓	Shared Resource Providers	✓	Meter Installers
	Device Manufacturers		Flexibility Providers
✓	DCC Other Users		MAPs/ MAMs

Suppliers would be required to follow DCC instructions during a specified time period, outlined in the PCID, so as to be compliant with the proposed SEC obligation.

This should result in improved DCC Services which would positively impact Users. If fewer messages are passing through the DCC Total System during peak periods, queues are less likely to form, reducing the likelihood of needing to re-submit messages in the event of message failures or timeouts.

DCC Systems

There are no changes required to the DCC Total System as part of this modification. The aim of the Proposed Solution is to circumnavigate the need to buy more expensive infrastructure within the DCC to cope with demand and focus on trafficking SR volumes effectively.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Appendix AB 'Service Request Processing Document'
- New Code Required Document - Price Cap Instructions Document (PCID)

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A, and the new PCID can be found in Annex B.

Devices

There will be no impact to Device behaviour from this modification.

Consumers

SRs impacting Consumers would be less likely to fail when submitted through the DCC System during a PCUE as a result of decreased traffic volumes. If non-essential SRs are no longer competing for DCC System Capacity, the likelihood of processing success rises, and the need of SR resubmission decreases.

Other industry Codes

There will be no impact on other industry Codes as a result of this modification.

Greenhouse gas emissions

There will be no impact on greenhouse gas emissions as a result of this modification.

5. Costs

DCC costs

There will be no DCC costs as a result of this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There is the potential for SEC Parties to incur costs as part of the Proposed Solution. The DCC intend to instruct Users to future date some of their SR traffic, which may not be possible for some Users. It is known certain DCC Users utilise Adapters that only allow for on-demand messages to be sent, so these Users would be unable to comply without system development taking place. This is also likely to affect Other Users. One respondent to the first Refinement Consultation (a Large Supplier) identified a potential cost in excess of £1m would be required to meet the requirements of the proposed SEC obligation.

6. Implementation approach

Approved implementation approach

The Change Sub-Committee (CSC) has agreed an implementation date of:

- **7 November 2024** (November 2024 SEC Release) if a decision to approve is received on or before 24 October 2024; or
- **Ad hoc release** (15 Working Days post decision) if a decision to approve is received after 24 October 2024.

Following implementation, DCC Users affected by the PCID would have a period of nine months to ensure their internal processes and systems enable compliancy with instructions outlined in the PCID before the SEC obligation becomes legally binding. Users are encouraged during the initial nine months to endeavour to follow the instructions outlined within the PCID.

7. Assessment of the proposal

Observations on the issue

Sub-Committee input

SECAS has engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Testing Advisory Group (TAG), the Smart Meter Device Assurance Sub-Committee (SMDASC), the Privacy Sub-Committee (PSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Define process for managing Price Control Events and review proposed governance process
PSC	We do not believe this has any privacy impacts
SMDASC	We do not believe this has any Device impacts
SMKI PMA	We do not believe this has any SMKI impacts
SSC	We do not believe this has any security impacts
TABASC	Review impacts to business process and architecture
TAG	We do not believe this has any testing impacts

Solution Development

Code Required Document

During the December 2023 Working Group, the DCC outlined their Proposed Solution to members. The DCC confirmed that to avoid having to raise a SEC modification every time changes are required, they would like to implement a Code Required Document enabling changes to be made outside of the modification process. This document would be owned by the DCC and would be consulted upon and approved by the SEC Panel.

SEC Governance and potential consequences

In November 2023, SECAS held a Webinar for SEC Parties to discuss this modification proposal, and gain perspective in relation to the Proposed Solution. Attendees were generally supportive of the modifications intent but were keen to see the proposed DCC instructions. Attendees also queried two aspects tied to the solution.

One attendee questioned who the DCC will consult with to establish, and then develop instructions for Users. The DCC stated they would present any proposed changes to Users, and following feedback received, would look towards gaining feedback from Sub-Committees such as the OPSG and TABASC. Once the proposed changes are finalised, these would be presented to the SEC Panel for approval, and the proposed Code Required Document, the PCID, would then be updated.

Another member questioned how the obligation within the SEC will be enforced. The SEC currently doesn't include anything that would penalise a User for ignoring the Proposed Solution. As the

Proposed Solution is non-system impacting, there would be nothing preventing undesired SRs being sent during Price Control Events. The DCC do not intend to introduce consequences for non-compliance as part of this modification. MP224 'SEC Performance Assurance Framework' proposes to implement a Performance Assurance Framework within the SEC to manage SEC obligations. MP253 may eventually be impacted by this framework.

DCC License Obligations

One member of the Working Group questioned if Ofgem were aware of this modification proposal. The member stated that the DCC are obligated to manage DCC Total System traffic at all times. SECAS confirmed Ofgem have been made aware of the modification proposal but had not indicated a stance on the modification proposal to date. The DCC confirmed the intent is to manage high peaks of traffic coming into the System, specifically from PCUEs, without needing to buy more infrastructure for infrequent events. Members of the Working Group were overall supportive of the Proposed Solution.

Change Process Timescales

Members of the Working Group queried how much notice would be given to Users to implement requirements of the DCC instructions. The DCC advised that if Users are unable to meet the instructions within the PCID, they would be required to notify the DCC one month prior to each PCUE to agree alternative instructions until the User is in a position to be compliant with the SEC obligation. One attendee (a Large Supplier) advised it could take up to one year to make the necessary internal system changes required to facilitate the modification.

Implementation Approach

Members of both the TABASC and Working Group highlighted that if MP253 is implemented with an immediate expectation for DCC Users to follow the instructions, this would result in SEC non-compliance. The TABASC did not recommend this course of action as a result. The TABASC advised moving the implementation date either to a later date, or to consider a future implementation clause within the legal text. The DCC therefore made an amendment to the legal text, implementing a nine month future implementation clause.

Legal Text

The Working Group raised concerns in relation to the proposed legal text. It was noted that implementing the modification without a period of 'preparation' allowing DCC Users to make the required changes to facilitate the instructions the DCC would be issuing for a PCUE. One attendee (a Large Supplier) advised it could take up to one year to make the necessary internal system changes required to facilitate the modification. Following this feedback, the DCC carried out multiple workshops with the Large Supplier to further understand their concerns. As a result of these discussions, the DCC made amendments to the proposed legal text and PCID, requiring a second Refinement Consultation. The DCC have removed a clause in the proposed legal text indicating SEC Parties affected by the PCID would still be in breach of the SEC obligation despite following a DCC requirement of notifying and agree alternative instructions during a PCUE. Alongside this, the DCC have refined the instructions for Users within the PCID.

Following the August 2024 Working Group, it was identified that if MP253 were to be implemented in November 2024 with an immediate expectation for SEC Parties to follow the obligation, this would result in several SEC Parties becoming non-compliant with the SEC. Working Group members identified this would be unfair on the affected Parties, as no period of time has been allocated to amend internal systems and processes.

As a result of this and feedback from the TABASC, the DCC have inserted a clause into the proposed legal text stating that SEC Parties affected by the Proposed Solution of MP253 would have nine months from the point of implementation before they would be obligated by the SEC to be compliant.

First Refinement Consultation

Feedback was provided relating to concerns the impact this modification could have to internal systems of DCC Users, as well as negative impacts other aspects of industry performance for example 'Guaranteed Standards of Performance' (GSOP). One respondent (a Large Supplier) highlighted a potential cost in excess of £1m to implement changes within their system to facilitate the DCC's future scheduled messaging instructions.

The DCC have subsequently held workshops with Parties who provided some of these comments and have proposed amendments to the legal text and PCID, which led to a second Refinement Consultation prior to returning to the Working Group.

Second Refinement Consultation

The majority of respondents in the second Refinement Consultation believed that MP253 should be approved and implemented. However, one respondent (a Large Supplier) felt that the amendments made to the proposed legal text changes were insufficient to justify the implementation of MP253. The respondent noted performance during 2024 PCUE's has improved steadily since 2023 and felt that obligating DCC Users to comply with instructions was unnecessary.

8. Case for change

Business case

The DCC collaborated with DCC Users during the Summer of 2023 in an attempt to mitigate potential incidents during a PCUE but found that DCC Users have not followed the requested actions. As there is no SEC obligation or mandate in place to enforce these instructions, the DCC System, and potentially consumers, have suffered because of higher-than-expected traffic volumes.

The DCC has specific performance targets to achieve in relation to the processing of SRs, and if traffic volumes exceed the capacity of the DCC System, the likelihood of achieving said targets decreases. The DCC has advised to effectively manage the current high volumes of traffic received during PCUEs without implementing an obligation upon SEC Parties, more DCC System infrastructure would be needed, carrying significant costs and development impacts.

There is the potential for SEC Parties to incur costs as part of the Proposed Solution. The DCC intend to instruct the relevant DCC Users to future date some of their SR traffic, which may not be possible for some DCC Users.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification will better facilitate General SEC Objective (a)¹ as it will support efficient operation of Smart Metering Systems by managing DCC Total System traffic and reducing demand. This includes the re-submission of failed or expired messages.

The Proposer also believes this modification will better facilitate General SEC Objective (c)² by ensuring tariffs are updated in a timely manner. It therefore helps consumers to better manage their energy use, particularly important Pre-Payment consumers.

Industry views

SECAS received six responses to the initial Refinement Consultation. Three Parties were in favour of implementing the modification, with the remaining three Parties recommending rejection of the modification.

Those in favour of the modification felt that the modification better supported SEC objectives (a) and (c).

SECAS received five responses to the second Refinement Consultation. Four Parties were in favour of the modification, with the remaining respondent recommending rejection of the modification.

Those in favour of the modification felt that the modification better supported SEC objectives (a), (b)³ and (c).

Views against the consumer areas

Improved safety and reliability

It is expected there will be a neutral impact in relation to improved safety and reliability.

Lower bills than would otherwise be the case

It is expected there will be a neutral impact in relation to the cost of bills.

Reduced environmental damage

It is expected there will be a neutral impact in relation to environmental damage.

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 enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence

Improved quality of service

It is expected there will be a positive impact on quality of service. The DCC will be more likely to hit their performance targets during periods of peak demand if DCC Users are able to future date or hold off submitting SRs that are unrelated to PCUEs. This will also allow for messages relating to PCUEs to process swiftly benefitting Users and Consumers alike.

Benefits for society as a whole

It is expected there will be a neutral impact in relation to society as a whole.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	5 Oct 2023
CSC converts Draft Proposal to Modification Proposal	17 Oct 2023
Modification discussed with SEC Panel	28 Nov 2023
Modification discussed with Working Group	6 Dec 2023
Refinement Consultation	13 Mar 2024 – 2 Apr 2024
Modification discussed with Working Group	3 Apr 2024
Second Refinement Consultation	10 Jul 2024 – 24 Jul 2024
<i>Modification discussed with OPSG</i>	<i>22 Jul 2024</i>
Modification discussed with TABASC	1 Aug 2024
Modification discussed with Working Group	7 Aug 2024
Modification Report approved by CSC	17 Sep 2024
Modification Report Consultation	18 Sep – 9 Oct 2024
Change Board Vote	23 Oct 2024

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company

Glossary	
Acronym	Full term
FOC	Full Operating Capability
GSOP	Guaranteed Standards of Performance
IOC	Initial Operating Capability
MAM	Meter Asset Manufacturer
MAP	Meter Asset Provider
MOC	Middle Operating Capability
OPSG	Operations Group
PCID	Price Cap Instructions Document
PCUE	Price Cap Update Event
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMDASC	Smart Meter Device Assurance Sub-Committee
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SR	Service Request
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
TRT	Target Response Time

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

Annex A

Legal text – version v1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section A ‘Definitions and Interpretation’

These changes have been redlined against Section A version 34.0.

Add the following definitions to Section A1.1 in alphabetical order as follows:

Price Cap Update Event (PCUE) means a change to the amount of one or more of the price caps applying to Supplier Parties under the Electricity Supply Licence or the Gas Supply Licence.

Price Cap Instructions Document (PCID) means the document of that name established and maintained by the DCC in accordance with the Service Request Processing Document, which sets out the instructions that Users must follow in respect of sending certain Service Requests at and around the time of a Price Cap Update Event.

Appendix AB 'Service Request Processing Document'

These changes have been redlined against Appendix AB version 9.0.

Renumber the existing Clause 21 (Definitions and Interpretation) as Clause 22, and add a new Clause 21 as follows:

21 Price Cap Update Events

21.1 DCC Users affected by the provisions set forth in the Price Cap Instructions Document (PCID) shall have a period of nine months from the date of implementation (7 November 2024) before the relevant clause becomes a binding obligation under the Smart Energy Code (SEC).

21.2 The DCC shall:

- (a) establish and periodically review the PCID in consultation with the Panel and the Parties;
- (b) seek approval from the Panel for the PCID and for any proposed changes that the DCC wishes to make to the PCID; and
- (c) as soon as reasonably practicable following the Panel's approval of the PCID or of any changes to the PCID, provide an up-to-date copy of the PCID to the Panel, the Parties, the Authority and (where requested) the Secretary of State.

21.3 Where a User wishes to implement changes to one or more of its consumers' energy tariffs in response to a Price Cap Update Event, the User shall follow the instructions within the PCID.



Tariff Update Instruction Document

Version: 1.0
Date: September 2024
Author: DCC

Document control heading

Revision history

Revision date	Summary of changes	Changes marked	Version number
18/12/2023	First draft		V0.1
03/01/2024	Second draft		V0.2
12/03/2024	Third draft		V0.3
07/06/2024	Forth draft		V0.4
27/08/2024	Fifth draft, addition of DCC actions		V0.5
18/09/2024	Version 1.0		V1.0

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1. Introduction

1.1. Document Purpose

1. This document has been published in accordance with Smart Energy Code (SEC) Appendix AB 'Service Request Processing Document'. It defines the obligations on SEC Parties during Price Cap Update Events (PCUE).

1.2. Change Control

2. In accordance with SEC Section Appendix AB 'Service Request Processing Document', DCC shall only make changes to this document where it has:
 - undertaken reasonable consultation with SEC Parties and Sub-Committees regarding proposed changes;
 - given due consideration to, and taken into account, any consultation responses received; and
 - received approval from the SEC Panel to make such changes.
3. Following SEC Panel approval of any changes DCC shall publish an updated copy of this document on the DCC Website.

1.3. Management Strategy

4. While it is noted that any and all Service Reference Variants (SRV) related to PCUEs, as well as normal system traffic, should be processed by DCC systems as quickly as possible, there is a need to prioritise traffic to protect consumers and manage overall demand.
5. A considered approach to management of the PCUE traffic has been taken, in collaboration with Parties, which will help to distribute the system traffic across a longer time period. While spreading the system traffic across a longer time period helps to reduce peak demand it is also important to consider whether any consumer group needs to be prioritised, either for protecting that consumer groups' services or vulnerability, or for ensuring Supplier Parties can continue to serve the group with efficiency. Parties have provided insight into the requirements of consumer group prioritisation for these purposes.
6. The rules set out in this document will help to distribute PCUE traffic over a longer time period and prioritise that traffic in the following order:
 1. Prepayment consumers.
 2. Monthly billed credit consumers where the bill cycle ends on the PCUE date.
 3. Monthly billed credit consumers where the bill cycle ends on the day after the PCUE date.
 4. All other credit consumers.
7. The following rules require that Parties send SRs for these groups of consumers at a particular time depending on the PCUE date.
8. The rules also require Parties to consider the PCUE date, where specific actions are required should the PCUE date, or the day after the PCUE date, fall on the first working day of the week. These rules are in place on the understanding that prepayment vend activity is often greater on the first working day of the week following the non-working

day non-disconnect period. The rules help to ensure that prepayment vend activity is not negatively impacted by the PCUE activity.

9. These rules apply for domestic customers only. However, Parties should avoid high volume of traffic on the dates and times described below for their non-domestic customers.

2. Supplier Party Requirements – SMETS2

10. This section sets out the action Supplier Parties will take to manage the demand they place on DCC systems. This section relates to actions required for consumers who have SMETS2 meters. Supplier Parties will follow the requirements of this section. All times quoted below are in 24hr clock format.

2.1. Prepayment consumers

11. For SR 1.1.1 & SRV 1.2.1 on the day of the PCUE:
 - Parties will execute only prepayment customer updates and complete them between 00:00-05:00. Noting the importance of tariff updates to this consumer group, SRs beyond 0500 are acceptable but Parties must take all reasonable steps to ensure their completion before 05:00.
 - Parties will use Device Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
 - Parties will evenly distribute the activation times of these Device Future Dated SRVs between 00:00 and 05:00 of the PCUE date.
 - Where the above action has been taken but On Demand updates are still required, Parties will evenly distribute them between 00:00-05:00.

2.2. Credit consumers monthly billed on the day of the Price Control Event

12. For SR 1.1.1 & 1.2.1 on the day of the PCUE:
 - SEC Parties will execute only monthly billed customer updates (where the bill is due on the PCUE date), from 0500 onwards.
 - Parties will use Device Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
 - Parties will evenly distribute the activation times of these Device Future Dated SRVs between 0500 and 2359 of the PCUE date.
 - In order to safeguard prepayment vend activity, where the PCUE occurs on the first working day and the week, Parties will
 - evenly distribute the activation times of these SRVs between 0500-2359 but avoid the window 0600-1200;
 - will not send On Demand updates between the window 0600-1200.

2.3. Credit consumers monthly billed on the day after the Price Control Event

13. For SRV 1.1.1 & 1.2.1 on the day after the PCUE:

- Parties will execute monthly billed customer updates (where the bill is due on the day after the PCUE date), only from 0000 to 06:00. These can be resumed post 12:00 if required.
- Parties will use Device Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- Parties will evenly distribute the activation times of these Device Future Dated SRVs between 0000 and 0559 and after 12:01.
- In order to safeguard prepayment vend activity, where the PCUE occurs on a non-working day and the day after the PCUE is a working day, Parties will
 - evenly distribute the activation times of these SRVs but avoid the window 06:00-12:00.¹

2.4. Other credit consumers

14. For SRV 1.1.1 & 1.2.1 on the day after the PCUE:

- Parties will begin the execution of credit customer updates from 1200.
- Parties will use Device Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- 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.

3. Supplier Party Requirements – SMETS1

15. This section sets out the action Supplier Parties will take to manage the demand they place on DCC systems. This section relates to actions requires to consumers who have SMETS1 meters. Supplier Parties will follow the requirements of this section. All times quoted below are in 24hr clock format.

3.1. Prepayment consumers

16. For SR 1.1.1 & SRV 1.2.1 on the day of the PCUE:

- Parties will execute only prepayment customer updates and complete them between 00:00 and 05:00. Noting the importance of tariff updates to this consumer group, SRVs beyond 05:00 are acceptable but Parties must take all reasonable steps to ensure their completion before 05:00.
- Parties will use Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- Parties will evenly distribute the activation times of these Device Future Dated SRVs between 00:00 and 05:00 of the PCUE date.
- Where the above action has been taken but On Demand updates are still required, Parties will evenly distribute them between 00:00-05:00.

¹ SEC Parties have highlighted the likely increase in Prepay vend activity on Day 2 as the non-disconnect period ends and consumers begin to top up.

3.2. Credit consumers monthly billed on the day of the Price Control Event

17. For SR 1.1.1 & 1.2.1 on the day of the PCUE:

- SEC Parties will execute only monthly billed customer updates (where the bill is due on the PCUE date), from 05:00 onwards
- Parties will use Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- Parties will evenly distribute the activation times of these Future Dated SRVs between 05:00 and 23:59 of the PCUE date.
- In order to safeguard prepayment vend activity, where the PCUE occurs on the first working day and the week, Parties will:
 - evenly distribute the activation times of these SRVs between 05:00-23:59 but avoid the window 06:00-12:00; and
 - will not send On Demand updates between the window 06:00-12:00.

3.3. Credit consumers monthly billed on the day after the Price Control Event

18. For SRV 1.1.1 & 1.2.1 on the day after the PCUE:

- Parties will execute monthly billed customer updates (where the bill is due on the day after the PCUE date), only from 00:00 to 06:00. These can be resumed post 12:00 if required.
- Parties will use Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- Parties will evenly distribute the activation times of these Device Future Dated SRVs between 00:00 and 05:59 and after 12:01.
- In In order to safeguard prepayment vend activity, where the PCUE occurs on a non-working day and the day after the PCUE is a working day, Parties will:
 - evenly distribute the activation times of these SRVs but avoid the window 06:00-12:00. 1

3.4. Other credit consumers

19. For SRV 1.1.1 & 1.2.1 on the day after the PCUE:

- Parties will begin the execution of credit customer updates from 1200.
- Parties will use Future Dated SRVs and evenly distribute the sending of these SRVs – they can be sent any time during the 30 calendar days preceding the PCUE date.
- Parties will evenly distribute the activation times of these SRVs over a minimum period of two and a half days beginning at 1200 on the day after the PCUE.

4. Supplier Party requirements - Other system demand / usage

20. For SRV 4.6.1

- SEC Parties will use scheduled 4.6.1 requests rather than On Demand requests to obtain price update meter readings.

21. For SRV 1.1.1 vs. SRV 1.2.1

- SEC Parties are encouraged to use SRV 1.2.1 in place of SRV 1.1.1 as SRV 1.2.1 is relatively smaller in size and returns fewer 8F66 alerts to SEC Parties.

22. DSP Overload Protection & On-Demand SRVs

- DSP Overload Protection is triggered by peak demand spikes in On-Demand traffic – and when activated it will restrict the flow of all On-Demand SRVs into DCC.
- SEC Parties must not use On Demand SRVs 1.1.1 or 1.2.1. to execute their updates.
- If DSP Overload Protection is activated, HTTP 503 errors will be returned to SEC Parties.
- This impacts On-Demand SRVs only – therefore SEC Parties who execute their price updates through On-Demand orchestrations may be particularly susceptible.
- These SRVs will NOT have been received by DCC and should be re-submitted, ideally after 30 minutes where practical to do so.

4.1. Non-essential activity

- Non-essential activities must be suspended on PCUE.
- Examples of essential activities include:
 - I&C,
 - CoS,
 - PPM actions,
 - any other actions that are required to be completed in short timescale (same day actions).

23. Parties are asked to consider their activity on the tariff update date, and where possible delay activity until a later date. This requirement should not stop or delay business activity that is required to be completed on the day of the tariff update.

5. DCC Actions

24. DCC will, where possible to do so, take steps to control the flow of Service Requests related to the PCUE in order to maintain service stability and protect price event outcomes.

25. Incidents will be managed in accordance with the established procedures.

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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

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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 1 st 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 27 th June, but that would only give 4 days notice ahead of 1 st 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.

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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.

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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 1 st 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.

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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.

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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.

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

Annex C

Second 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
Utilita	Large Supplier	Partially	These measures are only required because an automated technical solution is not available. While we believe these will resolve the issue, a technical solution would be the better option as it cannot be circumvented and will automatically make adjustments necessary. However, lacking this, these guidelines must suffice.	-
EON	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.	-
Scottish and Southern Electricity Networks	Network Party	Yes	N/A	-
National Grid Electricity Distribution	Network Party	Yes	N/A	-
Octopus Energy	Large Supplier	No	There has been no update to the outcome and performance of the Price Change Events beyond October 2023. There have now been 3 Price Change Events since this occurred with the most recent being on a working day (not a bank holiday or weekend), so we find it odd that the	<i>DCC Response:</i> DCC has presented details of performance during each Price Change Events to the SEC Operations Sub-Committee. Performance has improved since the first event. However, this improvement is a

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			DCC and SECAS believe there has been sufficient movement to justify a second Refinement Consultation. As we have previously indicated we remain unconvinced that this change will improve price change performance, and indeed is likely to worsen customer outcomes. Reflecting on the outcomes from the latest (1st July) price change event, we sent tariff update requests to circa 7 million meters. Whilst there was some variation in performance by CSP region/device model we saw on average 95%+ success rates, which is similar to the April price change event. We note that this was the first price change event to occur on a working day, yet the performance was at least as good, and for some cohorts, markedly better than earlier price change events. We believe this is due to both DCC and industry understanding how better to work together to achieve good customer outcomes, without having to resort to overly rigid and prescribed obligations. We also note that the DCC did not flag any incidents on the day of the price change and so presume that their service operated as intended. We note also that DCC plans to re-architect the DSP (as part of that imminent reprocurement) are intended to engineer out current capacity constraints and so any residual issues that DCC perceives around price change events will presumably not persist. We also do not believe that there is a need for very rigid and specific requirements on Price Control events – we believe that, at the most, the requirement should be for	result of some Parties following the issued guidance and DCC applying mitigations to balance traffic to protect service and maintain outcomes. DCC consider that if all Parties followed the guidance that performance could be further improved with less intervention. DCC also consider that where a Party does not follow the guidance but sees acceptable performance, that the performance seen is partially due to the actions of other Parties who follow the guidance. Without agreed rules Users have no requirement to work with DCC to manage traffic across the Price Change Event. The SEC sets standards for DCC and Parties to follow, DCC consider that this modification will not only result in improved performance across the event, but it will also standardise the requirements and actions required by Parties in an equitable manner. DCC were asked by SEC panel and OPSG to raise this modification. While DSP procurement will change some of the system architecture there will always be a limitation in peak traffic thresholds of

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			Users to engage and agree approaches with the DCC prior to a Price Change event that would allow for far more flexibility and adaptability when managing Price current and future Change events.	the end-to-end system. Different parts of the DCC total system have their own peak traffic threshold which the DSP procurement will not impact.

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

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	Large Supplier	Yes	No further comments	-
EON	Large Supplier	Partially	Clarification is needed within the text in respect to prioritisation applied in the event of an incident or DCC quarantine, for example. Due to system restrictions, we cannot evenly distribute the sending of SRVs for particular cohorts. Working with the DCC an execution time scale is agreed to send the SRVs which relate. How are these agreements with the DCC addressed in the PCID?	<i>DCC Response:</i> In the event of an incident during a PCUE the incident would be managed in the usual manner. With support from parties, DCC can add a requirement to the guidance that would delay action by the same amount of time as the unexpected outage. DCC has agreed some alternative actions with some Users who are unable to follow the current guidance. This modification would see that guidance become rules which should be followed by all Parties.
Scottish and Southern Electricity Networks	Network Party	Yes	N/A	-
National Grid Electricity Distribution	Network Party	Yes	N/A	-
Octopus Energy	Large Supplier	No	Please see response to Question 1. Although we are pleased to see the removal of the frankly counter intuitive statement regarding the below – we	<i>DCC Response:</i> DCC considers that this answer does not explain why the legal text does not deliver

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			believe that the requirement should be to engage with DCC prior to a Price Change event rather than meet a very specific approach that not all Users can currently support.	the change, but rather offers an alternative solution which would not result in any firm requirement or equitability across Parties.

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	Large Supplier	Yes	No further comments	-
EON	Large Supplier	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Party	Yes	N/A	-
National Grid Electricity Distribution	Network Party	Yes	N/A	-
Octopus Energy	Large Supplier	No	There is insufficient evidence to justify the urgency of this modification (noting the lack of recent Price Change event performance) and we believe that Users will not be in a position to support this modification (if implemented in its current state) until at least June 2025.	<i>DCC Response:</i> DCC considers that performance at recent Price Change Events has improved, and partly because the majority of Parties follow the guidance issued. Recent performance should not be used as justification that this modification is not required. Where parties need time to implement a solution to meet the requirements on the modification DCC consider that the lead-time should be considered as part of that Party plan.

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

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	Large Supplier	Yes	We would have to re-evaluate the process used for Price Change Update Events to ensure that we were compliant with the instructions as far as practicably possible. Whilst we currently comply with the guidance issued, this would require ongoing checks to ensure that if guidance is changed, we are making changes to our scheduling to continue compliance.	-
EON	Large Supplier	Minimal Impact	N/A	-
Scottish and Southern Electricity Networks	Network Party	N/A	SECAS response from previous refinement consultation noted that details have been requested on any impacts and any further information will be reviewed as we had noted that we believe SEC MP253 will impact SSSEN.	<i>DCC Response:</i> DCC has already confirmed that there is no impact for Network Parties as a result of this modification and the draft Price Cap Instruction Document. The PCID sections are titled "Supplier Party Requirements". There are no proposed requirements for any other type of DCC User. DCC is not clear on what impact the Network Party believes will be felt, and has not received any details on this potential impact.
National Grid Electricity Distribution	Network Party	Yes	We believe there will be impact to our organisation for reasons stated in the Modification Report.	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Octopus Energy	Large Supplier	Yes	As noted in our previous submission, we have yet to see an updated PCID that addresses our below points: “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 OnDemand 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 PCUE, to implement the recommended use of SRV1.2.1 in lieu of the currently used SRV1.1.1, amongst multiple	<i>DCC Response:</i> DCC note that Modifications often result in system impacts on Parties and those costs are taken into consideration in the modification process.

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			other development activities). These are significant changes that require significant development effort, which have not been factored into any planned development activity.”	

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

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	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.	SECAS note the potential costs of implementation.
EON	Large Supplier	Minimal, if any, cost to implement	N/A	-
Scottish and Southern Electricity Networks	Network Party	No Costs	N/A	-
National Grid Electricity Distribution	Network Party	No Costs	N/A	-
Octopus Energy	Large Supplier	More than £1m	As per our previous consultation response: “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 additional operational cost that this change will incur. For example, the PCID mandates that, for Credit customers who are not billed on	<i>DCC Response:</i> DCC note that Modifications often result in system impacts on Parties and those costs are taken into consideration in the modification process.

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			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 approval which we do not believe is an appropriate governance mechanism for an obligated process document that could have broad User System implications."	

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

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	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.	SECAS note the potential implementation time required.
EON	Large Supplier	Minimal time to implement	N/A	-
Scottish and Southern Electricity Networks	Network Party	N/A	N/A	-
National Grid Electricity Distribution	Network Party	None	N/A	
Octopus Energy	Large Supplier	6 months – 1 year	As noted in the response to Q4 and Q5, it is difficult to assess the timeframes to implement assuming there is a point of approval, 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.	<i>DCC Response:</i> Development timescales should be considered as part the modification process. DCC notes that where development is required Parties may not be able to immediately implement a change.

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

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Utilita	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.	-
EON	Large Supplier	Yes	Better facilitates SEC Objectives (a) and (c)	-
Scottish and Southern Electricity Networks	Network Party	Yes	MP253 will better facilitate General SEC Objectives as noted on modification report.	-
National Grid Electricity Distribution	Network Party	Yes	We believe this modification would better facilitate General SEC Objectives for reasons stated in the Modification Report.	-
Octopus Energy	Large Supplier	No	We do not believe it will better facilitate General SEC Objective (a), noting our rationale in Question 1. We do not believe the DCC response to your previous consultation response has sufficiently answered or provided evidence to alleviate the issues we raised, simply disagreed. In our previous we stated that: “We believe that this solution will increase traffic traversing DCC Total Systems, on PCUE day and the days that follow.	<i>DCC Response:</i> DCC is clear that the rules will spread traffic over a longer time period to a level that can be effectively managed by DCC systems. This helps to ensure that DCC Systems manage the total volume and help to deliver Objective (a). For Prepayment customers, who are prioritised in the rules, DCC consider that the rules will significantly benefit Objective (c) where their tariff is changed and they

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			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 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).	are charged correctly in real time. While other customers may see a slower update, DCC consider that overall updates will be more efficient and so this will also help to deliver Objective (c). On points regarding competition DCC does not consider that the requirements would “stifle effective competition”, particularly where all Parties are required to follow the same set of rules. DCC worked with parties to agree the initial guidance document where there was agreement that PrePayment customers should be prioritised.

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
Utilita	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. We believe these instructions insufficient to fully realise the benefits traffic control would have to these customers however, and would prefer to see a robust set of technical controls implemented, including the ability to hold Future Dated SRVs at device level for SMETS1 devices, as this would allow the requisite traffic to be spread over a long timeframe and not rely on DSP rate limiting or other rate controls.	<i>DCC Response:</i> DCC notes that SEC MP247 is currently investigating the possibility of future dated alerts from SMETS1 devices. Where such changes are implemented DCC would work with Parties to consider what changes to the rules document might be appropriate.
EON	Large Supplier	Yes	Minimising any potential delay in communication being sent to Smart meters would benefit consumers.	-
Scottish and Southern Electricity Networks	Network Party	Yes	As per noted on modification report.	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We believe that consumers will be impacted for reasons stated in the modification report.	-
Octopus Energy	Large Supplier	Yes	As per our previous response, 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. This will still have an impact on Consumers and has not changed since our previous response.	<i>DCC Response:</i> DCC consider that the rules will result in a more efficient implementation of the updates required for price control events, and ensure prepayment consumers are protected.

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
Utilita	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.	-
EON	Large Supplier	Yes	N/A	-
Scottish and Southern Electricity Networks	Network Party	Yes	N/A	-
National Grid Electricity Distribution	Network Party	Yes	N/A	-
Octopus Energy	Large Supplier	No	As noted throughout this and the previous 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	<i>DCC Response:</i> DCC consider that there will be benefits to Parties since controlling the traffic results in more efficient implementation of the changes required and reduce the risk of incidents occurring. The cost of increasing capacity for an event type that happens once per year, and may in the future not happen, would be an inefficient use of resources.

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Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			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. We acknowledge and are pleased to see there has been changes to the legal text regarding the counter intuitive point on compliance and PCID to reflect several points, however we still do not believe there is sufficient justification of the business case to alter our position from the previous consultation. As noted, there has been no new data presented (with the only data available being nearly a year old) that justifies the need for these changes and urgency for the legal text to be updated by November 2024.	DCC notes that any rules need industry support, and that any future amendment will require SEC Panel approval and so DCC does not consider that the modification provides DCC with any authority or power on how Parties manage their price change event or engage with their customers.

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

Question 10			
Respondent	Category	Comments	SECAS Response
Utilita	Large Supplier	The original intent of the modification is to formalise the intent to engage with and encourage best practices in order 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.	The DCC & SECAS re-affirms there is no intention to implement penalties or consequences in line with this modification. The sole intention is to effectively and proactively manage DCC Total System traffic during a PCUE.
EON	Large Supplier	Comments raised in previous consultation, and noted by the DCC, are not addressed, namely: '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 could impact Price Cap Update Events, i.e., is everything shifted forward by 'x-hours'?'	<i>DCC Response:</i> In the event of an incident during a PCUE the incident would be managed in the usual manner. Depending on the impact of the incident, requests would either queue to be executed when service is restored or need to be retried, this is how such events are managed at present.
Scottish and Southern Electricity Networks	Network Party	N/A	-
National Grid Electricity Distribution	Network Party	N/A	-
Octopus Energy	Large Supplier	N/A	-