

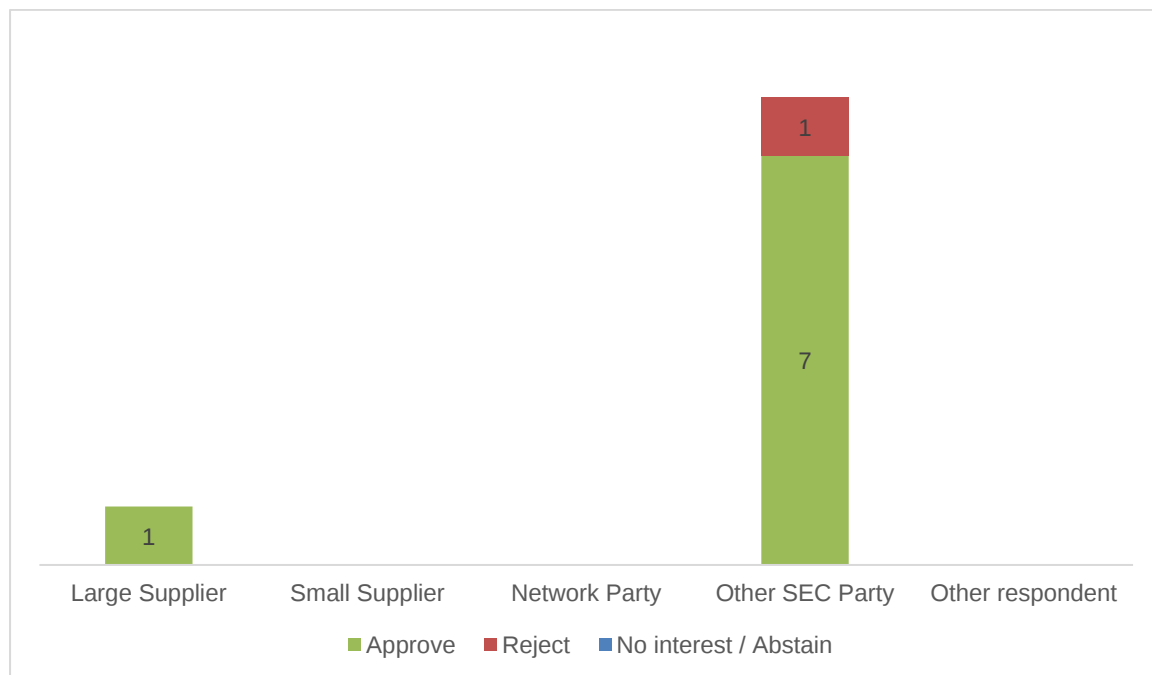
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MP271 ‘Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the [MP271 ‘Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents’](#) Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP271 should be approved or rejected?

Question 1				
Respondent	Category	Response	SEC Objective	Rationale
British Gas	Large Supplier	Approve	(a) ¹ , (c) ² , (d) ³	The changes won't impact the representation or voting rights at Change Board or TABASC for other party categories and is minimal cost. Effectively, this should really be a decision for the SEC Other Parties constituency. If the responses from SEC Other Parties are supportive for this change to be made, then we would give it our support. The cost is minimal, for just a legal change.
Calisen	Other SEC Party	Approve	(a), (c), (d)	OU/RSA/MDRs work on behalf of both suppliers and consumers, providing metering and data services for smarting metering. This helps to facilitate objectives a), c) and d) by allowing for increased engagement/representation.
Energy Assets	Other SEC Party	Approve		Energy Assets supports the full implementation of MP271.
Hildebrand	Other SEC Party	Approve	(c)	Issue, impact and proposed solution described in the Modification Report are clearly articulated and seems a sensible idea. The split between Manufacturers and those who handle data is required and the timing for making this split is good. Note that Hildebrand are a manufacturer and a DCC User; our main role is as a DCC User. We would say that including more of a voice for those who manage data does have an impact on consumers as it may help ensure that their voice is better heard as we make

¹ Facilitate the efficient provision, installation, operation and 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 of appropriate information via smart metering systems.

³ Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

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Question 1				
Respondent	Category	Response	SEC Objective	Rationale
				the transition towards our collective net zero vision (Section 2); this is not a direct impact as stated on page 4 of the Modification Report. As an OU we can confirm the point made from the Change Sub-Committee; it has been an expensive process to have to deal with a number of issues with non-responding meter variants, etc. that are a direct result of inadequate testing with the OU role historically.
Landis and Gyr	Other SEC Party	Approve	(a)	Giving SEC Other Parties a more equitable representation at TABASC and Change Board supports the consideration of all stakeholders views across the industry and thereby promotes the efficient provision of Smart Metering within the UK
Siemens	Other SEC Party	Approve		Siemens supports the introduction of MP271 - Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents.
Smart Meter Assets	Other SEC Party	Reject		This MOD would make no difference to delivery of any of the above objectives.
SMS	Other SEC Party	Approve	(a), (c), (d)	OU/RSA/MDRs work on behalf of both suppliers and consumers, providing metering and data services for SMETS meters. This expertise naturally aligns to, and better facilitates, objectives a), c) and d).
Stark	Other SEC Party	Approve	(a), (c), (d)	(a) Ensuring OU/RSA/MDRs have a seat on these committees will facilitate efficient provision, installation and operation of Smart meters by ensuring their specific experience is brought into discourse more.

Question 1				
Respondent	Category	Response	SEC Objective	Rationale
				(c) OU/RSA/MDR could create consumer propositions that facilitate energy management from their experiences and by specifically including them on these committees facilitates this objective. (d) Would help encourage greater engagement from the OU/RSA/MDR community which in turn will facilitate competition between organisations connected to supply of energy.

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	Whoever takes the roles representing the SEC Other Parties in the various sub committees needs to ensure they continue to take input from, and represent the views of, all parties in that constituency. I believe this is being confirmed in the ToR document. This is particularly important, I think, for Change Board.	The Terms of Reference of the Change Board state that voting members must “take account of representations given by any Party, giving due regard to the views expressed by the Parties within their Party Category” and “seek to act in the best interests of the majority, whilst representing the minority view (and, where a majority is not significant, the Voting Member should consider whether abstention from the vote best represents the interests of the Parties they represent”.
Calisen	Other SEC Party	We consider that specifying that an OSP seat should be filled by one of OU/MDR/RSA roles as far as possible, should help ensure that this subset of OSPs get appropriate representation at important SEC sub-committees and can be engaged in future developments.	
Energy Assets	Other SEC Party	-	
Hildebrand	Other SEC Party	-	

Question 2			
Respondent	Category	Comments	SECAS Response
Landis and Gyr	Other SEC Party	No additional comments	
Smart Meter Assets	Other SEC Party	OSPs are already represented in all relevant industry groups. Any individual representative on any group is there to represent their category and the view of constituents within the category. To that end, it does not matter who employs any elected representative as they are not representing themselves or their employer so splitting into sub-categories should make no difference. All OSPs have the right to be nominated to represent the group and there was little-no evidence provided that any sub-group within the OSP category has been unfairly treated. In short MP271 is not needed as there are already 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents' if they are nominated / nominate themselves and are selected via election.	
SMS	Other SEC Party	No further comments.	
Stark	Other SEC Party	-	