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

Annex B

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP271 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	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.
Chameleon	Other SEC Party	No	We do not recognise the issue as one that needs solving. There has not been a history of contested OSP seats and definitely not a level that would justify the creation of a new class of SEC Party. Engaged motivated individuals from the MDR, OU and RSA roles have no less chance of election for OSP seats than those from MAP, device manufacturer or other existing OSP organisation. This proposal will fracture the OSP group and we do not agree with the categorisation presented in the modification report. Our organisation has a very different outlook compared to that of a meter manufacturer and as an entity that offers direct to consumer services using a DCC Other User we feel our interests are misrepresented in the report. This suggestion appears short-sighted and will dilute the strength that the OSP group can bring to bear collectively. In our view a more engaged active OSP group would ultimately be a better long-term solution for MDRs, OUs and RSAs with themselves a key part of it.
Hildebrand	Other SEC Party	Yes	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 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.

Question 1			
Respondent	Category	Response	Rationale
			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. Note that we also suggest that either the Other User Role or Other SEC Parties label are changed - there is ongoing confusion about the difference. This is a point we've been making for quite some time, although not formally.
Smart Meter Assets	Other SEC Party	No	Simply deciding that a representative needs to be one type or another (i.e. DCC User or not) doesn't make it easier for "OSP representatives to act on behalf of the entire constituency". What is presented is a risk rather than an issue – there is scant evidence that DCC user OSPs are being nominated but not elected. Information provided in table 2 incorrectly labels representatives as purely "manufacturer" when they work for organisations who operate in multiple roles and, in any and all cases, elected representatives are not representing themselves or their organisation but the whole constituency. Note that these points were made at Change Board on reading the Mod Report.
SMS Energy Services	Other SEC Party	Yes	Allocating an OSP seat specifically to a Party that is a DCC User in any of the OU/MDR/RSA roles will ensure appropriate engagement and representation of these Users.
Stark	Other SEC Party	Yes	Allocating an OSP seat specifically to a Party that is a DCC User in any of the OU/MDR/RSA roles will ensure that this subset of OSPs get appropriate representation at important SEC sub-committees. With these Users forecast to grow and have a higher proportion of overall DCC traffic, it is important they are engaged across the SEC.
Utilita Energy Ltd	Large Supplier	No	As noted in the modification report, elections to the Other User seats within the subcommittees are rare and have not occurred in recent years, so there is no evidence to suggest that this process does not work.

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Question 1			
Respondent	Category	Response	Rationale
			Further, implementing this modification unnecessarily complicates the allocation of seats, requiring manual verification of party status, as the user roles required are DCC roles rather than SEC Party roles. This issue could be resolved through increasing engagement within the Other User group rather than reallocating seats.

Question 2: Do you agree that the legal text will deliver MP271?

Question 2			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	-
Chameleon	Other SEC Party	Yes	The text would deliver the stated aim but we believe this should not be pursued.
Hildebrand	Other SEC Party	Yes	Not legal experts on the SEC so defer to the expertise of whoever wrote that document.
Smart Meter Assets	Other SEC Party	N/A	Not reviewed the legal text as bigger issue is whether the modification is justified.
SMS Energy Supply	Other SEC Party	Yes	No comments
Stark	Other SEC Party	Yes	The text allows for an OSP seat on each relevant committee to be allocated to an OU/RSA/MDR. It also allows for this to revert to any OSP if a OU/RSA/MDR does not come forward.
Utilita Energy Ltd	Large Supplier	No	It is unclear that this modification is required, therefore the legal text is also unnecessary.

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Calisen	Other SEC Party	Yes	-	
Chameleon	Other SEC Party	No	TABASC has already indicated it would want additional seats not a reduction in amount of available expertise and experience. If there is to be a new group of organisations that need separate specific representation Change board seats should be created. In our view it would be better to drive for a more engaged OSP group across the full range of organisations within it.	Before being raised as a modification, SECAS and the Proposer considered creating new seats at the Change Board. This was discussed with the Issues Group in August 2024 who were not supportive of altering the current composition of the Change Board. As such, the Proposed Solution seeks to re-allocate seats at Change Board rather than adding new seats.
Hildebrand	Other SEC Party	Yes	Sooner the better in our view.	
Smart Meter Assets	Other SEC Party	Yes	Agree with the “approach” in terms of the timing but don’t agree this should be implemented at all.	
SMS Energy Supply	Other SEC Party	Yes	No comments	
Stark	Other SEC Party	Yes	No comments.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	We do not believe this modification should be implemented.	

Question 4: Will there be any impact on your organisation to implement MP271?

Question 4			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	Not at this time
Chameleon	Other SEC Party	Yes	Harder to continue engaging but more importantly a distraction and potential fracturing of organisations within the OSP group.
Hildebrand	Other SEC Party	Yes	Improves our opportunity to ensure that the voice of the Other User role is better represented in TABASC and the Change Board.
Smart Meter Assets	Other SEC Party	No	
SMS Energy Supply	Other SEC Party	No	The change will not bring any negative impacts, the positive impacts will be our engagement and representation at SEC.
Stark	Other SEC Party	No	No impact to implement but will open up our engagement with the SEC
Utilita Energy Ltd	Large Supplier	No	Should this modification be implemented, there would be no implementation impact on us.

Question 5: Will your organisation incur any costs in implementing MP271?

Question 5			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	No costs	
Chameleon	Other SEC Party	N/A	
Hildebrand	Other SEC Party	No costs	
Smart Meter Assets	Other SEC Party	No costs	
SMS Energy Supply	Other SEC Party	No costs	No comments
Stark	Other SEC Party	No costs	
Utilita Energy Ltd	Large Supplier	No costs	There would be no direct costs for us to implement this.

Question 6: How long from the point of approval would your organisation need to implement MP271?

Question 6			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party		No direct impact
Chameleon	Other SEC Party	N/A	
Hildebrand	Other SEC Party	None	
Smart Meter Assets	Other SEC Party	N/A	
SMS Energy Supply	Other SEC Party	N/A	No lead time required; we will not need to undertake any activities.
Stark	Other SEC Party	N/A	
Utilita Energy Ltd	Large Supplier	No lead time	As there are no actions required by us to implement this, there would be no lead time.

Question 7: Do you believe that MP271 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	SEC Objective(s)	Rationale
Calisen	Other SEC Party		A ¹ , C ² , D ³	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.
Chameleon	Other SEC Party			No, the motivation appears to be self-interest and is perhaps short-sighted as it would encourage a more divisive and partisan approach from OSPs which won't benefit smart metering and ultimately the MDRs, OUs and RSAs themselves. Driving for a more engaged approach from across the OSP group with representative unified views would lead to a more effective delivery of the SEC objectives. Extra groups and administration with associated costs should be avoided.
Hildebrand	Other SEC Party	Yes	C	
Smart Meter Assets	Other SEC Party	No	N/A	Don't believe there is an issue and the change as proposed will simply mean there is an OSP elected who is a DCC user – why they be any better equipped to “adequately represent the entire category”?
SMS Energy Supply	Other SEC Party	Yes	A, C, D	

¹ To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² To 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 To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

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Question 7				
Respondent	Category	Response	SEC Objective(s)	Rationale
Stark	Other SEC Party	Yes	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) by allowing for increased engagement/representation.
Utilita Energy Ltd	Large Supplier	No		As these parties are already able to give input into discussions and issues without having a seat on the subcommittees, there are no additional benefits to be gained by implementing this.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP271 is implemented?

Question 8			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	All SEC party roles operate differently and specific changes will impact these parties differently – this change would allow for these specific roles to be appropriately represented.
Chameleon	Other SEC Party	Yes	The discussion is distracting industry from focusing on the issues affecting consumers, drawing effort and resources away from the practical issues the industry is facing. If implemented it would reduce the scope of organisations that can participate in solving them.
Hildebrand	Other SEC Party	Yes	Should help address the current scenario where there have been a number of failures in OU role testing which have resulted in various subsets of consumers (depends on the CH, ESME, or GSME) can't get their data from that device, or join a CAD to their HAN.
Smart Meter Assets	Other SEC Party	No	
SMS Energy Supply	Other SEC Party	Yes	Consumers will have their interests represented more fully at SEC sub-committees, via their OU/MDR/RSA service providers.
Stark	Other SEC Party	Yes	Consumers that use OU/MDR/RSA services will have their interests represented more fully at SEC sub-committees.
Utilita Energy Ltd	Large Supplier	No	We do not believe there would be any additional consumer benefit realised by this modification.

Question 9: MP271 proposes changes to the composition of the TABASC and Change Board. Parties have noted that they support the changes to one Sub-Committee, but not both. Please indicate whether you are supportive of the changes to both Sub-Committees, one of the two, or are unsupportive of the Proposed Solution.

Question 9			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	These groups would benefit from this change
Chameleon	Other SEC Party	I am unsupportive of the Proposed Solution.	TABASC benefits from broad engagement and filtering out organisations does not assist in this. If there is to be a new group of organisations that need separate specific representation Change board seats should be created. Existing OSP organisations are no less relevant or valid after the arrival of new organisations. It could be suggested that taking a seat from large suppliers and allocating to MDR, OUs and RSAs would be similarly justifiable.
Energy Assets	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Hildebrand	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	

Question 9			
Respondent	Category	Response	Rationale
Siemens	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Smart Meter Assets	Other SEC Party	No response	
SMS Energy Supply	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	Changing both will allow for increased engagement and representation in Technical, Governance and Regulatory issues.
Stark	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Utilita Energy Ltd	Large Supplier	I am unsupportive of the Proposed Solution.	As these seats are allocated via election, and there has been minimal need for elections in previous years due to number of applicants, we do not believe there is any need for changes to either of these bodies at this time. It is also important to note that as the appointments are voted by other members of the same category, in the cases where elections have been required, the overall group have chosen the representative they feel best represents them – attempting to force a seat to a subset of these users could decrease confidence in the representation being provided.

Question 10: Noting the costs and benefits of this modification, do you believe MP271 should be approved?

Question 10			
Respondent	Category	Response	Comments
Calisen	Other SEC Party	Yes	As per question 8
Chameleon	Other SEC Party	No	It does not represent a valuable use of time and resources, with no obvious benefit to consumers or addressing the major issues organisations within smart metering should be collectively addressing.
Energy Assets	Other SEC Party	Yes	Energy Assets supports the full implementation of MP271.
Hildebrand	Other SEC Party	Yes	See responses above
Siemens	Other SEC Party	Yes	Siemens supports the introduction of MP271.
Smart Meter Assets	Other SEC Party	No	No issue identified

Question 10			
Respondent	Category	Response	Comments
SMS Energy Supply	Other SEC Party	Yes	No comments.
Stark	Other SEC Party	Yes	Low costs for high benefits.
Utilita	Large Supplier	No	We do not believe this modification is required. Subcommittee seats are allocated via election, which allows the user group to shape the representation they desire, and forcing specific groups onto specific seats would limit this autonomy and potentially breed discontent over the process.

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party		No further comments
Chameleon	Other SEC Party		I believe the while the OSP is a disparate group it has so far generally worked collaboratively. There is a mix of interests and levels of engagement. In my experience there is more unity than division across Other SEC Parties as interests often align or are at worst orthogonal. Most contradictory positions have usually not seen OSPs pitted against one another in “sub categories”. Instead OSPs have typically aligned against another Party type or licenced role holder in discussions. As an OSP representative I have always tried to act in a balanced way representing the interests of the entire group. Engaged experienced individuals from Other SEC Party organisations appear to be in short supply relative to the number of member organisations and all should be welcomed equally. If a group does not feel well represented SECAS should be changing the way it manages the OSP group and engagement within it. I would personally welcome a stronger framework from SECAS steering the engagement between OSPs and their representatives given the absence of an obvious industry body for all members (ie. Energy UK). As suggested by others non-voting access to groups should also be considered where the principal issue is access to information rather than influence over changes. If the partisan approach suggested in this modification was to be progressed, breaking the OSP group up then this would require a much more detailed and complex modification to draw out all the respective groups and ensure each felt it was surrounded by other suitably aligned organisations.
Hildebrand	Other SEC Party	N/A	

Question 11			
Respondent	Category	Response	Rationale
Smart Meter Assets	Other SEC Party	N/A	
SMS Energy Supply	Other SEC Party		No further comments.
Stark	Other SEC Party		No further comments.
Utilita Energy Ltd	Large Supplier		No further comments.