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MP273 ‘User Demand and Network Traffic Insights’

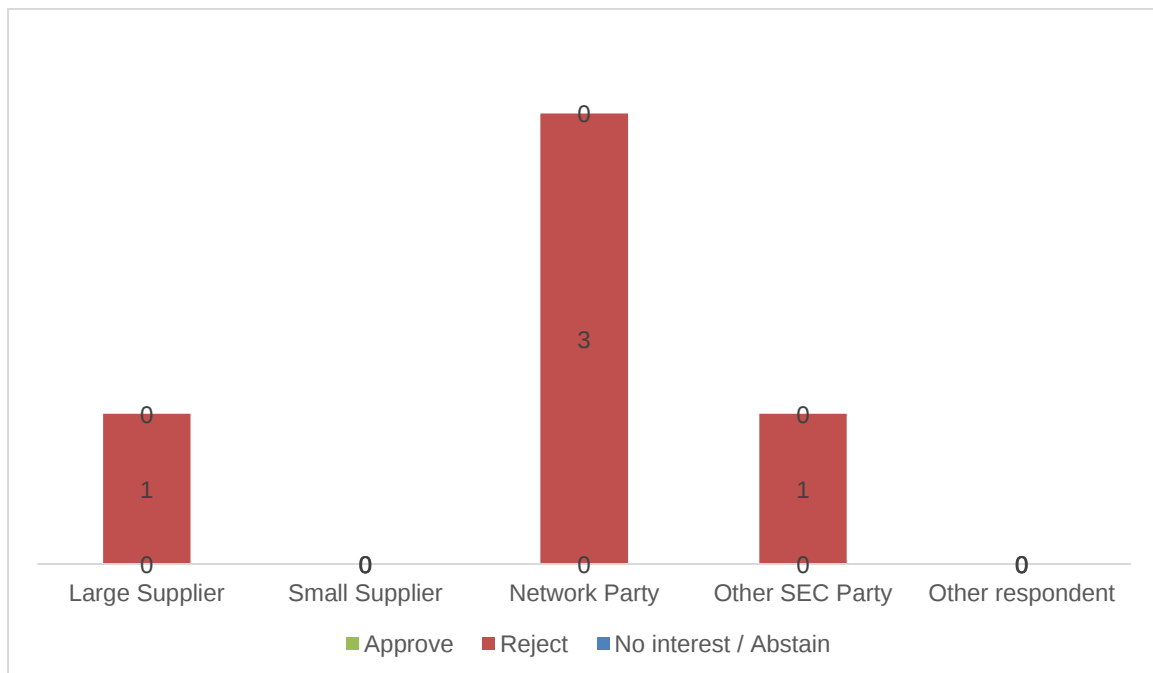
Annex A

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP273 Refinement Consultation.

Summary of responses



Refinement Consultation

SECAS received five responses to the Modification Report Consultation. Five believed that the modification should be rejected. They considered the modification did not resolve the identified issue and that there was already a viable resolution in place. Respondents did not believe that this Modification would better facilitate any objectives.

SEC Objectives....(a)¹, (b)², (c)³, (d)⁴, (e)⁵, (f)⁶, (g)⁷ and (h)⁸.

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

² 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.

³ 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.

⁴ facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

⁵ facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.

⁶ ensure the protection of Data and the security of Data and Systems in the operation of this Code.

⁷ facilitate the efficient and transparent administration and implementation of this Code.

⁸ facilitate the establishment and operation of the Alt HAN Arrangements.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	No	We do not agree with the proposed solution for the following reasons: absence of sight of the detailed data and methodology to support the core DCC statement that Network Operators network demand will significantly increase by 40% in 2026. We raised the same concerns in our response to the DP218 RFI which is proposing changes to the SEC charging methodology based on the same DCC ‘assumption’ that network demand will significantly increase but in absence of supporting evidence/transparency of the DCC’s demand profiling methodology. We recommend any assumptions on network demand should be based on at least 12 months’ worth of data this modification and DP218 and comparative to all users to provide context and transparency, This approach would allow the DCC time to consult and collaboratively work with industry to enable the DCC to more effectively determine if the current arrangements remain “fit-for-purpose” or needs to be adjusted based on a reasonable sample size of data. Furthermore, the figure of network demand from Network Operators has jumped from 29% in 2026 under DP218 to 40% in 2026 under MP273 with no explanation.	The network demand growth projections for Distribution Network Operators (DNOs) are based on bilateral discussions and insight from the Network Operators themselves. Some DNOs have already started to ramp up usage of the DCC network; for example DNO traffic increased by 46% over the 6 months between April 2024 and October 2024. The majority are expected to increase traffic significantly in 2025, with further increases in the first half of 2026. A number of use cases of the DCC network have been identified, for example use of the following SRVs: 4.10 – Shows trends in voltage per household to ensure that properties have the correct voltage going in but also to monitor fluctuations which could indicate network issues. DNOs can aggregate this data to identify trends and can use it to anticipate faults or power cuts before they arise. 4.8.1/2 – Shows the demand on the network and is aggregated to 5

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
				households or more. The DNO will use this to determine whether there is an appropriate balance between supply and demand. 7.4 – On-demand usage during a power outage to determine the extent of the outage and whether supply has been restored to specific premises. An example of recent DNO growth is SR7.4 usage which increased from 0.3 million per week in June to a peak of 1.2 million in November. Regarding the suggestion to review 12 months of past data to inform these trends, this will be useful and forms part of our analysis. However, the use cases identified by DNOs represent a step-change in future demand which will not be picked up by reviewing past data. In addition, DCC need to be informed about new Users and new use cases. Looking at past data will not give insight into new Users which could introduce disruptive patterns of demand. Regarding the difference in network demand forecast under DP218 and MP273, more recent forecasts were available to us when we were preparing MP273:

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			- Users are already limited to their maximum traffic potential based on ADT thresholds, consequently Network Operators are unable to activate sudden uplifts in volumes. - views raised by the Operations Group members that they did not feel that the proposed solution was the right one as this approach had already been proven to be ineffective and that the main issue was from usage by Other Users.	- Forecast in DP218 was based on Arqiva proxy from Sept 2023. Assumptions are aligned to January 24 OPSG (OPSG_109) - Forecast in OPSG was based on DSP level from June 2024. Assumptions of which are in the May 2024 OPSG (OPSG_117). While Anomaly Detection Thresholds (ADT) are a very useful tool for protecting the network, they are typically set so high that it takes a serious event, e.g., outage / security flaw, before they are triggered. This process outlined in MP273 is more about BAU capacity and cost optimisation. We are working with all User Groups, including the Other Users to understand their use cases and future demand. However, for those User Groups which have very high baseline usage (e.g. Large Suppliers), changes in their demand profile can have a disproportionately large impact on the network. Therefore, it is important for DCC to have insights into material future shifts in demand from all Users.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	MP116 'Service Request Forecasting' was implemented in February 2022 to remove an obligation for DCC Users to provide forecasting, stating that "the accuracy of these forecasts does not meet the level required to produce useful data that will improve the management of demand on the DCC User Interface Services". With no material changes to Users forecast accuracy, this data is unlikely to provide the insight the DCC requires.	The ask in MP273 is very different to the demand forecasting that was requested previously and was removed by MP116. This is not requesting detailed forecasts, but high-level insights and advance warning of large step changes in demand. It is necessary for DCC to have sight of future material changes in demand so that we can scale the network via our Service Providers in the most efficient and cost-effective way possible and ensure there is sufficient time to do so without impacting the overall performance of the network for all users. Not having advance warning of future demand changes creates the risk that DCC could significantly under-forecast (resulting in customer experience and network performance issues) or over-forecast (resulting in unnecessary investment in network capacity or much earlier than needed). It is in all stakeholders' interests for DCC to be able to scale the network in a timely and cost-efficient manner. Regarding accuracy, there is now greater knowledge available about user behaviour and rollout plans compared to when the previous process was in place, meaning that projections should be more accurate - however there is a clear dependency on the information shared by Users where

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
				new use cases or material changes are involved
UK Power Networks	Networks Party	No	UK Power Networks does not agree with the proposed solution to provide a quarterly insight and plans relating to forecast traffic including new use cases, increased roll out, and innovations for the following reasons: - UK Power Networks acknowledges that DCC requires visibility of Users' demand to effectively scale their network capacity. However, we believe that the existing monthly Service Reviews sufficiently provide opportunities for engagement, allowing DCC to understand User forecasts and demands. - Network Operators already submit monthly anomaly detection threshold values to DCC that effectively limits their maximum traffic throughput and are therefore unable to suddenly increase their traffic volumes. - Our response to DP218 Review of the SEC Charging Methodology RFI1 Question 1 also should be considered where UK Power Networks highlighted that the increasing data traffic demand is not unexpected from Network Operators because smart metering systems are reaching a point where delivery of benefits to consumers is beginning to be realised from the circa 60%	The process outlined under MP273 should be supported by Service Reviews / bilateral meetings, as it is important to engage and work collaboratively with Users to achieve the outcomes they need. The process under MP273 will ensure that DCC is always notified of material changes to the demand on the network. The process is intended to be light touch where there is a material change or new user/use cases, or for most zero touch. Once a user has notified a material change and/or new use case, this should then be picked up through ongoing bilateral engagement, without the need to notify each quarter for the same item. As a regulated business, we require a level of formality around notification of planned changes (or no change) to demonstrate our capacity plans - and consequently changes in costs as a result. DCC is currently considering the submission threshold to reframe it in terms of a significant change in demand on the DCC network overall (at DSP level and/or at individual CSP level) instead of measuring this for an individual user.

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			national smart meter coverage of smart meters installed in homes and small business. UK Power Networks recommends that DCC engage with Other Users, as that is where the key issues occur.	As part of DCC's Quarterly Demand Forecast updates to OPSG, DCC will publish total network usage, so that individual Users are kept informed about the total demand on DCC Network.
National Grid Electricity Distribution	Networks Party	No	We do not support the proposed solution for the following reasons: There is a lack of detailed data and methodology to substantiate the core DCC assertion that network demand from Network Operators will increase significantly by 40% in 2026. We previously expressed similar concerns in our response to the DP218 RFI, which suggests changes to the SEC charging methodology based on the same DCC assumption of a substantial increase in network demand, yet lacks supporting evidence and transparency regarding the DCC's demand profiling methodology. We recommend that any assumptions about network demand be grounded in at least 12 months of data for both this modification and DP218, and that they be compared across all users to provide context and transparency. This approach would allow the DCC to consult and collaborate with the industry, enabling a more effective assessment of whether the current arrangements are "fit for purpose" or need adjustments based on a reasonable sample size of data. Additionally, the projected network demand from Network Operators has escalated from 29% in 2026 under DP218 to 40% in 2026 under MP273 without any explanation.	See first answer to Q1 above.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			Users are already constrained by their maximum traffic potential due to ADT thresholds, which means Network Operators cannot accommodate sudden increases in volumes. Feedback from Operations Group members indicates that they do not believe the proposed solution is appropriate, as this approach has already proven ineffective, with the main issue stemming from usage by Other Users.	

Question 2: Do you believe there any other viable approaches to resolve this issue?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Yes	We agree with the views of the Operational Group that existing monthly service reviews that the DCC conducts provide sufficient opportunity for engagement and insight to enable the DCC to predict demand use, This will allow a more timely (more frequent than quarterly) and seamless conversation about a Users' intention to change volumes/timescales prior to any implementation. A quarterly review is too broad a timeframe (only 4 times a year) to comfortably promote a demand change and get it implemented – this would go against the intent to utilise Smart Meter Data from both and industry and consumer benefit points of view.	See the third answer to Q1 above regarding the role of Service Reviews. Regarding the quarterly timeline, DCC will add in an option for a resubmission to take place if a User becomes aware of a significant demand change between quarterly submissions. Such a re-submission could replace the next scheduled regular submission.
Utilita Energy Ltd	Large Supplier	Yes	As the modification is more focused on gaining insight into new use cases and changes in installation volumes that would drive increased network traffic, we believe that utilising regular bilateral or service review meetings with each User would be a better route to gaining the insight the DCC seeks.	See first answer to Q2 above.
UK Power Networks	Networks Party	Yes	UK Power Networks believe that, in addition to the DCC monthly service reviews for discussing network capacity and demand and our other points in response to Question 1, DCC should consider the view from the Technical Architecture and Business Architecture Sub-Committee whether (+/-10%) threshold on submissions was too low and needed to be re-thought.	See third answer to Q1 above regarding DCC reviewing the threshold for notifying changes in demand.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Networks Party	Yes	We align with the Operational Group's perspective that the existing monthly service reviews conducted by the DCC offer adequate opportunities for engagement and insights necessary for predicting demand usage. This approach would facilitate more timely and seamless discussions regarding a User's intention to adjust volumes or timescales before implementation, as monthly reviews allow for more frequent communication than the current quarterly schedule. A quarterly review is too lengthy a timeframe to effectively promote demand changes and ensure their implementation. This would contradict the goal of leveraging smart meter data for the benefit of both the industry and consumers.	See the third answer to Q1 above regarding the role of Service Reviews and the first answer to Q2 above regarding the quarterly timeline.

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	No	An implementation date of February or June 2025 rules out the DCC basing their assumption/statement that Network Operators usage will increase to 40% by 2040 on 12 months worth of data,	The projection of 40% increased usage from DNOs is by 2026 rather than 2040.
Utilita Energy Ltd	Large Supplier	No	We do not believe this modification should be implemented.	
UK Power Networks	Networks Party	No	UK Power Networks does not agree with the proposed implementation approach because of the reasons mentioned in response to Question 1.	
National Grid Electricity Distribution	Networks Party	No	An implementation date set for February or June 2025 eliminates the possibility for the DCC to base their assumption or statement that Network Operators' usage will rise to 40% by 2040 on just 12 months of data.	See answer above.

Question 4: Will there be any impact on your organisation to implement MP273?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Yes	We would be unable to change our network demand with prior notification to the DCC at the monthly service review meetings - to support project work that is likely to provide industry and consumer benefits. A rigid quarterly forecasting does not allow sufficient flexibility, for example if project is scheduled to be completed mid-quarter we would be required to wait until the next planning window to submit an intention to increase.	DCC is requesting advance warning of large volume changes in this Modification and does not envisage this being a blocker to SEC Parties implementing any changes. DCC welcomes regular engagement on any changes to plans previously shared. Please also note the proposed changes to the levels of materiality in Question 1 responses.
Utilita Energy Ltd	Large Supplier	Yes	There would be a resource requirement to complete the form and/or forecast the DCC propose to create. As this form has not been shared, we are forced to use the previous estimate of 2 working days to produce as noted in MP116.	The process (including screenshots of the form) has been shared at a number of SEC meetings, most recently at OPSG on 12/11/2024. This is a very simple Microsoft Form that only asks for high level information. DCC will share the form with Users. Note that the process has been simplified compared to what was shared previously by the elimination of the additional Excel form for further detail. Please also note the proposed changes to the levels of materiality in Question 1 responses.
UK Power Networks	Networks Party	Yes	A rigid quarterly submission date for forecast demand values limits flexibility for projects to deliver benefits to consumers and UK Power Networks because the project	See first answer to Q2 regarding the quarterly timeline.

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Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			delivery dates would become tied to the DCC quarterly demand submission dates.	
National Grid Electricity Distribution	Networks Party	Yes	We would not be able to adjust our network demand with prior notice to the DCC during the monthly service review meetings to facilitate project work that is expected to benefit the industry and consumers. The rigid nature of quarterly forecasting does not provide enough flexibility; for instance, if a project is planned for completion in the middle of a quarter, we would have to wait until the next planning cycle to express our intention to increase demand.	See first answer to Q2 regarding the quarterly timeline.

Question 5: Will your organisation incur any costs in implementing MP273?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Yes	We are unable to quantify the costs but we would anticipate increased costs from delays in the commencement of project work whilst awaiting submission (and potentially approval?) of quarterly forecast traffic plans to the DCC.	This Modification is not requesting detailed demand forecasts, but insights on future plans, subject to the materiality and/or new user/use cases outlined in Question 1 responses.
Utilita Energy Ltd	Large Supplier	£100k-£250k	There is the potential that one or more new reports may need to be created to provide the relevant data. This is in addition to the FTE required to complete the submission to DCC each month.	As all that is being requested as part of this process are high level demand insights and notice of significant upcoming changes, it is unlikely that specific reports will be needed to support this.
UK Power Networks	Networks Party	Yes	We anticipate that there would be additional costs incurred from delays due to a need for compliance with the rigid quarterly demand submission dates. However, we are unable to quantify the level of additional costs at this stage.	See first answer to Q5 above.
National Grid Electricity Distribution	Networks Party	Yes	While we cannot specify the costs, we anticipate that delays in starting project work due to waiting for the submission (and possibly approval) of quarterly forecast traffic plans to the DCC will lead to increased costs.	See first answer to Q5 above.

Question 6: How long from the point of approval would your organisation need to implement MP273?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Unknown	The modification report is silent on the legal text which would accompany the proposed solution and if the DCC propose Users will require approval before they can implement their forecast traffic plans and/or if Users are required to submit plans before they implement demand changes, We would also require sight of the intended format, platform and level of detail required for submission before we are able to determine how long it would require us to implement any changes to our systems or processes.	The legal text will be provided by SECAS as part of the Modifications development. DCC are proposing reducing the level of documentation required to a Microsoft Form as an initial submission. Most Users will be excluded due to a materiality threshold based on the impact of the change on the DCC network as a whole. If a significant change in demand is anticipated this will be discussed in Service Reviews and/or bilateral meetings.
Utilita Energy Ltd	Large Supplier	3 – 6 months	This timescale assumes new reports are required. If this is not the case, the implementation time would be less than 3 months. This would give the appropriate areas producing the report time to become familiar with the data required by the DCC as part of the submission, as well as locate the relevant data within existing reports.	Due to the high-level nature of the information requested, DCC does not believe that new reports will be required.
UK Power Networks	Networks Party	Unknown	The proposed solution mentions use of a Microsoft form template for submission of forecast data traffic demand with no further information related to specific details to be submitted. We are therefore unable to advise how long it would take UK Power Networks to implement MP273, if it were to be approved.	Please see second answer to Q4 above.

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Networks Party	Unknown	The modification report does not address the legal text that would accompany the proposed solution, nor does it clarify whether the DCC's proposed uses will require approval before they can implement their forecast traffic plans, or if users must submit plans prior to making demand changes. Additionally, we would need to see the intended format, platform, and level of detail required for submission before we can assess how long it would take us to implement any changes to our systems or processes.	The legal text will be provided by SECAS as part of the Modification development. DCC believes that user insights will provide information that could help DCC provision additional capacity for any User project requiring it ahead of implementation. DCC does not propose introducing the right to stop or delay User projects. DCC are proposing reducing the level of documentation required to a Microsoft Form as an initial submission. If significant demand changes are anticipated, these will be discussed at Services Reviews and/or bilateral meetings.

Question 7: Do you believe that MP273 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	No	We view this proposal as going against SEC objective (e) as it could be a blocker to User projects which could facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy	DCC believes that user insights will provide information that could help DCC provision additional capacity for any User project requiring it ahead of implementation. DCC does not propose introducing the right to stop or delay User projects.
Utilita Energy Ltd	Large Supplier	No	There has no evidence provided that these forecasts will be any more accurate than those previous obligated under the SEC and removed by MP116, therefore the benefits outline are unlikely to be realised and alternate mean, such as bilateral meetings or an item at monthly service reviews should be sought instead.	DCC believes the wider scope including higher volume Users and changed approach <i>in addition</i> to bilateral meetings and service reviews will provide a sound basis for capacity forecasts and management.
UK Power Networks	Networks Party	No	We believe that MP273 could hinder Network Operators' projects and does not support General SEC Objectives, in particular objective E (Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy).	See first answer to Q7 above.
National Grid Electricity Distribution	Networks Party	No	We believe this proposal contradicts SEC objective (e) as it may hinder User projects that could promote innovation in the design and operation of energy networks, ultimately impacting the delivery of a secure and sustainable energy supply.	See first answer to Q7 above.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP273 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Yes	The proposed solution could have a negative impact on customers realising the benefits of ENWL project work to delays in the DCC approving forecast traffic plans unnecessarily	DCC is requesting advance warning of large volume changes and does not envisage this being a blocker to SEC parties implementing any changes. The DCC is not approving traffic plans but incorporating them into their forecasting.
Utilita Energy Ltd	Large Supplier	Yes	This has the potential to avoid failed vends due to timeouts, however, this requires accurate forecasting to enable DCCs service providers to flex capacity.	Agreed, it is unlikely that this Modification is to provide data at that level of detail, rather it is a contributor to the detailed level of forecasting carried out by DCC.
UK Power Networks	Networks Party	Yes	UK Power Networks believes there would be an adverse impact on consumers because of delays in projects delivering consumer benefits from the rigid quarterly submission dates for forecast data traffic demand to the DCC impacting project delivery dates.	See first answer to Q8 above. If Parties were to submit forecasts ahead of a quarter, this could replace that scheduled forecast.
National Grid Electricity Distribution	Networks Party	Yes	The proposed solution could negatively affect customers' ability to benefit from NGED project work due to delays in the DCC's approval of forecast traffic plans.	See first answer to Q8 above.

Question 9: Noting the costs and benefits of this modification, do you believe MP273 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	No	Refer to our responses to Q1-8.	
Utilita Energy Ltd	Large Supplier	No	Given the difficulty meeting the required accuracy for these forecasts to provide useful data, we do not believe this modification should be implemented.	
UK Power Networks	Networks Party	No	See response to Question 1.	
National Grid Electricity Distribution	Networks Party	No	Please refer to our responses and questions 1-8.	

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

Question 10			
Respondent	Category	Comments	SECAS Response
Electricity North West Limited	Networks Party	We recommend the SECCo, the SEC Change Group and the SEC Panel make the linkage and investigate the baseline assumption from the DCC and which underpins MP218 and this MP273 regarding a statement /assumption Network Operator demand traffic for the DCC network will increase by 29-40% and which is not based on detailed data, methodology or material sample size shared which has been shared with SEC parties or consulted upon with Users.	The basis of the forecasts is explained in Question 1. These forecasts were made with the best possible information and will continue to be refined.
National Grid Electricity Distribution	Networks Party	We recommend that the SECCo, the SEC Change Group, and the SEC panel establish a connection and investigate the baseline assumptions from the DCC that underpin MP218 and MP273. Specifically, we seek clarification regarding the statement or assumption that network operator demand traffic for the DCC network will increase by 29% to 40%. This assumption does not appear to be based on a detailed data methodology or a substantial sample size that has been shared with SEC parties or consulted with Users.	See answer above.
N3rgy	Other SEC party	In response to MP273, the DCC seem to operate the only digital network on the planet that cannot manage it own capacity effectively. DCC needs to move to a better self-monitoring, management and forecasting model based on their own data, take responsibility for managing the network (as per their licence) efficiently and responsively and not create great and great regulatory burdens on their users. This modification create a further opportunity for the DCC to step away from their responsibilities by blaming their customers forecast for poor capacity management practices. I reject this modification.	It is not the DCC which generates the network traffic, but the Service Users using the provided network. As there are no limits defined for either the volume of Service Requests or the type of information sent, by Service Users, DCC can only respond retrospectively to demand changes if forecasts are not provided. Most digital networks will use

Question 10			
Respondent	Category	Comments	SECAS Response
			customer and market insight to inform their capacity scaling plans.

Note: The DCC suggest that the Performance Assurance Framework (PAF) being developed by the Performance Assurance Board (PAB) is used to highlight and address situations where party behaviour is creating costs/risk for other code parties.