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MP202 ‘Enduring Solution to SMETS1 and SMETS2+ PPMIDs’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP202 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	
EDF	Large Supplier	Yes	
EON	Large Supplier	Yes	While we agree this would resolve the issue above, we feel that supplier implementation changes could be made where we only need to deliver 2 separate lines on the CPL.
National Grid Electricity Distribution	Networks Party	Yes	We believe that the solution put forward will effectively resolve the identified issue.
OVO Energy	Large Supplier	Yes	As it is written in the modification report and PA, we agree that the solution will resolve the issue, however, we would prefer that the issue was clearly outlined in both documents, rather than us having to take DCC's word for the workaround not working as it should. Exactly why is the workaround not working? Why do the devices require replacement when the workaround fails? We feel that this detail is missing and therefore question exactly why it is we need to make this change, which is not cheap. As we understand it, we support the need for it, but question why it is that we must pay to fix it when it is not clearly outlined as to why the workaround doesn't always work.

Question 2: Do you agree that the legal text will deliver MP202?

Question 2			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	Not reviewed
EDF	Large Supplier	Yes	The revised wording, while meeting Requirement 2: Remove obligation for different Firmware Versions results in almost identical wording for both clause 13.3 (a) and 13.3 (c) barring the reference to SMETS1 and SMETS2+ systems. Would it be beneficial to add wording to specify in 13.3 (a) that the CPL entry must use the SMETS2+ values for CHTS version and GBCS version, and in 13.3 (b) that the CPL entry must use the SMETS1 values to CHTS version and GBCS version? These data points are where the defining data will be held to indicate which SMETS version the PPMID will be installed with
EON	Large Supplier	Yes	
National Grid Electricity Distribution	Networks Party	Yes	We agree with the proposed Legal Text.
OVO Energy	Large Supplier	Yes	

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

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	The cost seems high, and we are also confused by the reference to 6 million devices being impacted (see answer to Question 10).
EDF	Large Supplier	Yes	This seems a logical approach
EON	Large Supplier	No	Obviously knowing the timeframes for MPs to be implemented means this is not likely to be earlier, but it should be noted that this modification will not be delivered for another 17 months at the earliest point, which begs the question of whether it is even of benefit given the costs for delivery.
National Grid Electricity Distribution	Networks Party	Yes	We agree with the proposed implementation approach.
OVO Energy	Large Supplier	Yes	On the basis that it appears to be the only way to do it, however, this seems like a lengthy timeline to fix a workaround that isn't working, for reasons that are not outlined in the PA.

Question 4: Will there be any impact on your organisation to implement MP202?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	
EDF	Large Supplier	Yes	This change will require some test activities to assure the change following implementation and will remove some processes currently in place to support the Interim solution.
EON	Large Supplier	No	
National Grid Electricity Distribution	Networks Party	No	We believe there will be no direct impact to our organisation
OVO Energy	Large Supplier	Yes	We will be able to install the same model of PPMID during any installation without a workaround that fails.

Question 5: Will your organisation incur any costs in implementing MP202?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	
EDF	Large Supplier	No	
EON	Large Supplier	No costs	
National Grid Electricity Distribution	Networks Party	No costs	We believe there will be no direct costs to our organisation
OVO Energy	Large Supplier	Yes	Unknown, until the costs are further defined. We are unable to give cost savings until we further understand the reason that we are being charged for this modification.

Question 6: How long from the point of approval would your organisation need to implement MP202?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	
EDF	Large Supplier	Minimal Effort	Cessation of workaround process only
EON	Large Supplier	Straight away	No changes our side will be needed.
National Grid Electricity Distribution	Networks Party	N/A	
OVO Energy	Large Supplier	Immediately	

Question 7: Do you believe that MP202 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	It seems expensive for unclear benefit.
EDF	Large Supplier	Yes	
EON	Large Supplier	No	There are already processes available for suppliers to install these devices in different SMETS versions, so this wouldn't be expanding on any of the objectives already being met.
National Grid Electricity Distribution	Networks Party	Yes	We believe that this modification will better facilitate General SEC Objective (a).
OVO Energy	Large Supplier	Yes	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP202 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	
EDF	Large Supplier	Yes	Positive impact as less risk of process delays impacting installation.
EON	Large Supplier	Yes	Depending on the supplier the customer is with, some customers may be able to obtain an IHD easier if they are on a SMETS1 set.
National Grid Electricity Distribution	Networks Party	Yes	We believe that consumers will benefit from this modification for the reasons stated in the Modification Report.
OVO Energy	Large Supplier	Yes	The likelihood of being left with a working PPMID will be greater.

Question 9: Noting the costs and benefits of this modification, do you believe MP202 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	The cost is high, and we are not clear on the benefits, particularly if only 2 suppliers are impacted. We are confused (see below) by the claim that 6 million devices are impacted – this seems very high.
EDF	Large Supplier	Yes	
EON	Large Supplier	No	We do not feel we would benefit from this modification, especially with the costs and timeframes associated with it.
National Grid Electricity Distribution	Networks Party	Yes	
OVO Energy	Large Supplier	Yes	With a big HOWEVER, not necessarily through this process. Looking at the cost alone, this appears to be a big change. We would like to understand what is being done to make this better as this seems like a lot of money. We question why it is that DCC cannot handle this in the first place for there to be a workaround that then is not working. This detail is missing. We don't necessarily feel that the management of perfectly valid device should be for Suppliers to pay for. If the issue is with the CPL then we feel that this is between SECAS and DDC to resolve. If it is that the DCC systems were not updated as part of E&A to allow for the devices to be used for both SMETS versions then we feel that this is a defect, as DCC were on the hook to make the changes to enable SMETS1 to work using their Services. These are lengthy and expensive changes that we will be paying for. We agree that it needs sorting, but don't necessarily agree that it should be via the modification process.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
British Gas	Large Supplier	We are confused by the size of the issue this would be aiming to resolve. There is mention of 6 million devices impacted, but we are not sure if these are 6 million devices already installed (for which this would be too late), or 6 million already in the supply chain and pre-notified as SMETS1 / SMETS2+ (but this seems a very high figure), or 6 million planned purchases in the future (which again seems very high for just two suppliers, particularly if only a small portion of this total would be for SMETS1 replacements). This is particularly important given the high cost of resolution (up to £750k for the first category of costs only).
EDF	Large Supplier	
EON	Large Supplier	
National Grid Electricity Distribution	Networks Party	
OVO Energy	Large Supplier	This seems like a big and lengthy change. What is being done to make the CPL better? We would like to understand what happens with the PPMID once the DSP has made it's determination, i.e. if we were to remove the device and install it elsewhere, would it be locked to that SMETS version or would the process start again? We feel that the rather large cost range given as part of the PA backs us into a corner where we feel that we have to pay for the FIA to be able to establish a more sensible and accurate cost impact. We have seen this on numerous occasions and don't necessarily feel that this is a suitable process to establish costs.