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MP244 ‘Device Alerts for Smart Meter credit replenishment’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP244 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	No	Technically this would have been a good idea if implemented from the start, but it is too costly and difficult to implement retrospectively. The expected £2m cost for manufacturers is too high. We also think implementing the solution will take more time in practice than the 'targeted November 2025 Release' (on page 3 of the Modification report) suggests, once time for manufacturers to deliver the requirements, time for suppliers to test, and time for all meters to be updated OTA, is taken into account. We notice that later in the modification report, June 2026 and June 2027 Release dates are mentioned instead. We presume the proposer needs a solution quicker than this. In our opinion, it would seem most sensible to go for a non-mandated Alert solution. Or alternatively, to keep going with the current work-around(s).
E.ON	Large Supplier	Yes	-
Octopus	Large Supplier	Not entirely	The proposed solution does effectively resolve the identified issue, although as noted, there is already a solution available via SR7.4 and the modification and associated costs only cover the DCC and SEC changes. There is further work, significant cost and time following this modification for this to be effectively implemented due to changes required to GBSCS and by meter manufacturers. The modification takes steps towards resolving the issue but by the isolated approval of this modification the solution itself is unlikely to be available for some time and it's unclear whether this would have a positive or negative impact on DCC traffic profiles.

Question 2: Do you agree that the legal text will deliver MP244?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	As with our answer to qn 1, we don't think the solution will effectively resolve the identified issue. However, separately there is something wrong with the legal text document you have shared – there are lots of “Error” messages in the text, where the references appear to be broken.	The legal text has now been corrected to show the information without the error messages.
E.ON	Large Supplier	No comment	No comment, as it was difficult to read the amended text as the document when opened had numerous ‘Error - reference source not found’ messages.	
Octopus	Large Supplier	Yes	The legal text appropriately covers the implementation but as before, the proposal does not resolve the issue in full which MP244 sets out to resolve.	-

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

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	-
Octopus	Large Supplier	Yes	We have no comments on the proposed implementation approach of targeting June 2026 or 2027. However, as noted previously, this is the partial implementation with no forecasted timelines from Manufacturers on implementation.

Question 4: Will there be any impact on your organisation to implement MP244?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	No	-
Octopus	Large Supplier	Minimal impact	As we already have an appropriate way of determining supply status and supporting vulnerable customers, this change would not necessarily have an impact on processes and systems as we understand the alert will be configurable. The implementation of MP244 would bring another option that would have an impact if we wanted to support the new alert.

Question 5: Will your organisation incur any costs in implementing MP244?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	No	-
Octopus	Large Supplier	Unknown cost to implement	We would likely utilise the proposed alert which would require adjusting the alerts used in our vulnerable prepayment customer support. The cost would come if we changed to use the new alert once it is implemented. There would likely also be a cost seen in manufacturers FW which would be required to introduce the alert therefore the linked costs are unknown.

Question 6: How long from the point of approval would your organisation need to implement MP244?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Immediately	-
Octopus	Large Supplier	Minimal time	MP244 requires no changes to our system however it offers a different way of monitoring something we already monitor. With this in mind we would need little time to implement the alert proposed in MP244.

Question 7: Do you believe that MP244 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	-	Better facilitates General SEC Objective (a) and (c)
Octopus	Large Supplier	Yes	SEC objective A is better facilitated by MP244 by “efficient operation of smart metering systems at energy consumers premises”. Efficient due to having a single alert for supply being reestablished where there is currently a work around requiring multiple SR's being sent.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP244 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	-
Octopus	Large Supplier	Yes	The modification does not bring direct benefits to the consumer and the benefits it offers are to a limited set of customers. The benefits only come from suppliers taking action off the back of the successful implementation of this alert and implementing better support than currently exists. Consumers will however feel the cost of this Modification via costs being levied upon suppliers which ultimately impacts consumers bills.

Question 9: Noting the costs and benefits of this modification, do you believe MP244 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	-
Octopus	Large Supplier	No	Whilst we appreciate that there is the potential to support vulnerable customers if this modification were approved and appropriately utilised by energy suppliers, we feel the unknown final costs and time to deliver are likely to outweigh the benefit.

Question 10: How does your organisation identify self-rationing or self-disconnecting consumers at present?

Question 10		
Respondent	Category	Response and rationale
British Gas	Large Supplier	-
E.ON	Large Supplier	Daily work task to review any reported 8F83 alerts. These alerts are shared with the team who support vulnerable customers so that contact can be made with the customer about their energy supply. Implementation of the Modification would reduce time and effort spent in reviewing and responding to the alerts reported.
Octopus	Large Supplier	We have a specific team which supports this area. We have a dashboard which tracks SPAYG disconnections, and we send an email to customers if they have not re-enabled supply after 2 hours offering support and options.

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

Question 11		
Respondent	Category	Comments
British Gas	Large Supplier	-
E.ON	Large Supplier	-
Octopus	Large Supplier	We think it is positive to create mechanisms to better support and serve vulnerable customers however we do not feel that MP244 is the most efficient and cost-effective way of doing so. The issue of supporting vulnerable and off supply customers has existed for some time and we believe that suppliers will have appropriate mechanisms in place. We also do not believe the volume of SR7.4 is concerning. MP244 states the volume is 4.7 million messages out of total of over 2,000 million- making it 0.235% of all traffic. 7.4's are not solely used to determine how long someone has been off supply so any reduction caused by MP244 would be insignificant. When considering the time and cost it will take for these alerts to appear in the ecosystem in a beneficial manner, we do not believe they carry an appropriate benefit for the cost to consumers. We would also note that the discussion around the 7.4's is related to DSP traffic, and we do not believe it is appropriate to introduce costly modifications with the intention of lowering traffic or smoothing traffic. The traffic management should be dealt with more centrally and feels unconvincing to use that argument in this MP. There is also discussion of "off supply alerts" not being generated, how can we be confident in the same mechanism to provide an "on supply alert" reliably? If the alert cannot be relied upon then it negates any benefit.