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MP320 ‘MP320 ‘Enhanced MAP & Manufacturer DCC reporting’

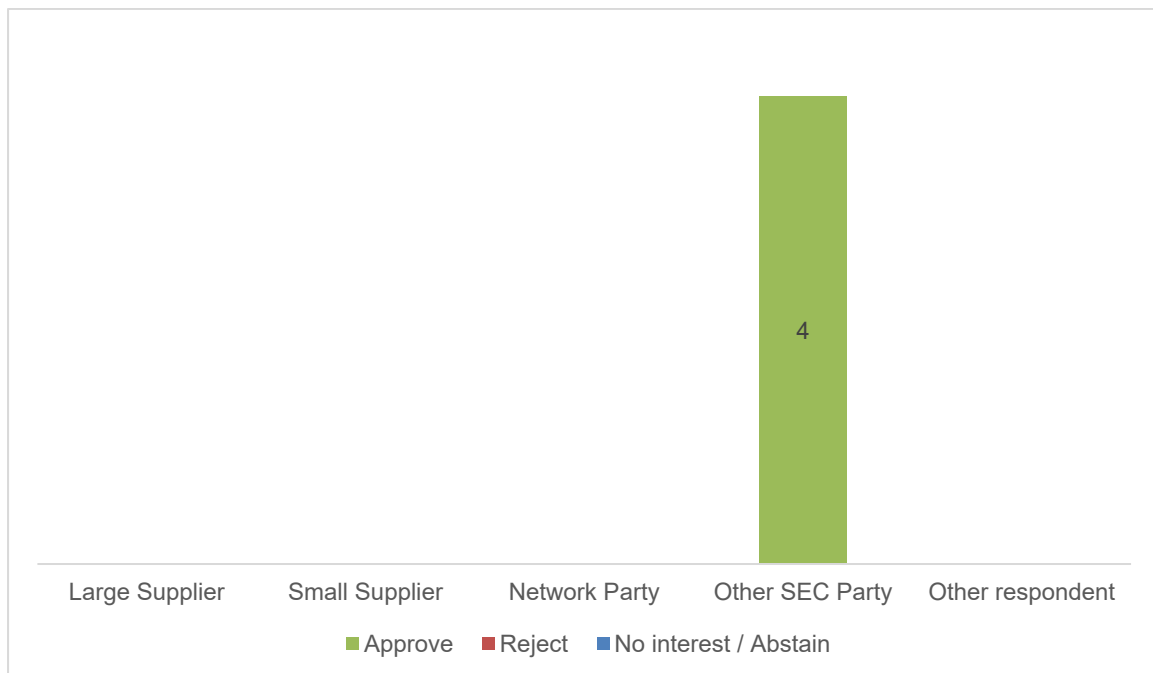
Annex B

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP320 Refinement Consultation.

Summary of responses



Refinement Consultation

SECAS received 4 responses to the Refinement Consultation. All 4 respondents believed that the modification should be approved. They considered the modification better facilitated SEC Objectives (a)¹, (b)², (c)³, & (g)⁴.

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 the efficient and transparent administration and implementation of this Code.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	Access to reporting will enable MAPs and Manufacturers to better support Energy Suppliers particularly concerning non communicating meters	N/A
Centrica Smart Meter Assets	Other SEC Party	Yes	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	The proposed solution directly addresses the current limitations in the MAP reporting dataset by introducing additional data items that materially improve visibility of device performance, communications behaviour, and operational status. These enhancements will allow MAPs, including NPML, to identify discrepancies, emerging issues, and meter health data more accurately. This aligns with the original problem statement and provides a proportionate, low impact means of strengthening asset oversight.	N/A
Calisen Asset Management Ltd	Other SEC Party	Yes	Meter Asset Providers (MAPs) are keen to gain access to additional data to enable us to work with energy suppliers to proactively manage our metering estates and ensure meters work in smart mode and to help reduce unnecessary removals.	N/A

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			Being able to remotely assess how the meter is working and why it may not be communicating is critical and we need more data to do so. Having access to this additional data will provide help across the whole industry and reduce costs to end consumers. Maximising meter health and reducing the volume of non-communicating meters, helps the success of the remainder of the smart meter rollout. Furthermore, MAPs helping suppliers manage their portfolios and increase the volume of communicating smart meters helps in meeting their all reasonable steps obligations and will help if future changes to Guaranteed Standards of performance are introduced.	

Question 2: Do you agree that the legal text will deliver MP320?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	Meets the requirement	N/A
Centrica Smart Meter Assets	Other SEC Party	Yes	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	The legal drafting accurately reflects the intent and scope of MP320, including the introduction of the Work Package 1 data items and the governance arrangements for future dataset updates. The text is clear, implementable, and consistent with existing SEC structures. NPML has not identified any inconsistencies or omissions that would prevent the modification from being delivered as described.	N/A
Calisen Asset Management Ltd	Other SEC Party	Yes	Supportive of the proposed changes to legal text.	N/A

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	Meets the requirement	N/A
Centrica Smart Meter Assets	Other SEC Party	Yes	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Partly	While NPML broadly supports the proposed implementation approach, we would like to note an observation regarding how the dataset was developed. MAPs were originally advised that the expanded reporting dataset would be shaped collaboratively, with industry input helping to determine which data items would deliver the greatest operational value. However, the final set of items included in Work Package 1 appears to have been determined by the DCC, without the level of comprehensive engagement or co design that MAPs were expecting. As a result, the dataset does not fully reflect the differing operational needs of all MAPs, and some items that would have delivered significant value are absent.	The SEC Change team will provide this feedback to the Proposer, with the intention of addressing the feedback during the July 2026 Working Group meeting.
Calisen Asset Management Ltd	Other SEC Party	Yes	We are supportive of the approach and are keen to ensure this is progressed as soon as possible.	N/A

Question 4: Will there be any impact on your organisation to implement MP320?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	This SEC modification will have a positive impact on our organisation, giving more information on our installed assets and if they are still communicating.	N/A
Centrica Smart Meter Assets	Other SEC Party	No	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	NPML will need to undertake minor internal activities to integrate the additional data items into existing reporting. These activities are expected to be low effort and will not require any system redevelopment. Ongoing impacts will be positive, as the enhanced dataset may reduce manual investigation effort.	N/A
Calisen Asset Management Ltd	Other SEC Party	Yes	Calisen will be positively impacted by this change – as per Q1 response, we need access to additional data to be able to help our supplier parties manage our meters more effectively, reduce premature removals by keeping smart meters installed and helping to ensure they work in smart mode.	N/A

Question 5: Will your organisation incur any costs in implementing MP320?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	None	<i>No rationale provided</i>	N/A
Centrica Smart Meter Assets	Other SEC Party	TBC	Will the cost of the MAP/Manufacturer report change? That wasn't mentioned anywhere in the Refinement Consultation pack, so we presume any change will be minimal.	The SEC Change team will provide this feedback to the Proposer, with the intention of confirming the outcome at the next Working Group meeting (July 2026).
Northern Powergrid Metering Ltd	Other SEC Party	Yes	Implementation costs will be limited to minor internal resource effort to incorporate the new data items into NPML's reporting processes. No system build or external spend is anticipated. Cost savings will arise from reduced manual investigation, earlier identification of asset issues, and improved alignment between NPML and DCC data.	N/A
Calisen Asset Management Ltd	Other SEC Party	No	Calisen do not expect to be impacted by the implementation of this change, as we already have a monthly process in place to import the data we receive as part of our MP181 process.	N/A

Question 6: Will there be any benefit to your organisation in implementing MP320?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	None	<i>No rationale provided</i>	N/A
Centrica Smart Meter Assets	Other SEC Party	Yes	Wider number of data items. We welcome the increased scope.	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	NPML will benefit from better visibility of how our assets are performing, allowing earlier detection of communication or device issues. The additional data will also help us check DCC information against our own records more easily. Overall, this will support smoother asset management, reduce operational effort, and improve coordination with suppliers and the DCC. These benefits will become increasingly important as our SMETS1 assets near end of life.	N/A
Calisen Asset Management Ltd	Other SEC Party	No	The implementation of this MOD and provision of more information to MAPs should help meter triage and reduce the volume of meters being removed prematurely. The overall cost to industry of charges associated with removals are extensive and ultimately impact consumer's bills. Therefore any actions we can take to improve this will result in cost savings to both us but also industry wide.	N/A

Question 7: How long from the point of approval would your organisation need to implement MP320?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	We're happy with the proposed September timeline	This is in line with expectations set by DCC	N/A
Centrica Smart Meter Assets	Other SEC Party	None	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	4-6 weeks	This timeframe allows for internal data updates, validation of the new data items, and adjustments to reporting dashboards.	N/A
Calisen Asset Management Ltd	Other SEC Party	1-2 weeks	In advance of the MOD being approved, we will take action to prepare for readiness of being able to accept the additional data. This would be completed in advance so we would be ready on the go live date.	N/A

Question 8: Do you believe that MP320 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
Horizon Energy Infrastructure	Other SEC Party	Yes	Objectives (a) & (c)	<i>No rationale provided</i>
Centrica Smart Meter Assets	Other SEC Party	Yes	Objective (a)	<i>No rationale provided</i>
Northern Powergrid Metering Ltd	Other SEC Party	Yes	Objectives (a), (b) & (g)	(a): Enhanced reporting improves the efficient operation of Smart Metering Systems by enabling earlier detection of device issues and supporting proactive asset management. (b): The modification supports the DCC in efficiently discharging its obligations by improving data transparency and reducing the volume of ad-hoc queries and investigations. (g): The structured approach to dataset governance and the improved visibility of device performance contribute to more efficient and transparent administration of the SEC.
Calisen Asset Management Ltd	Other SEC Party	Yes	Objectives (a) & (c)	Calisen consider this change facilitates A and C as per previous responses.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP320 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	Early detection of any issues with meters that aren't communicating	N/A
Centrica Smart Meter Assets	Other SEC Party	None	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	Consumers will indirectly benefit from improved device performance, reduced fault durations, and more efficient resolution of communications issues. Enhanced reporting enables MAPs, Manufacturers and Suppliers to identify and address problems earlier, reducing the likelihood of prolonged outages, billing issues, or unnecessary site visits.	N/A
Calisen Asset Management Ltd	Other SEC Party	Yes	As mentioned in previous responses, the implementation of this MOD should help reduce the volume of premature removal of meters, costs of which are borne by consumers. Furthermore, the range of benefits smart meters provide to consumers, cannot be realised when meters are not communicating – having access to this data will help us minimise the volume of meters not working in smart mode and help us realise these benefits for consumers (and suppliers and networks).	N/A

Question 10: Noting the costs and benefits of this modification, do you believe MP320 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	Yes	It will enable us as a MAP to better support Energy Suppliers with non-communicating meters.	N/A
Centrica Smart Meter Assets	Other SEC Party	Yes	<i>No rationale provided</i>	N/A
Northern Powergrid Metering Ltd	Other SEC Party	Yes	MP320 delivers clear operational and strategic benefits to MAPs, Suppliers, and the wider smart metering ecosystem at minimal cost. It enhances data transparency, supports better asset lifecycle management, and strengthens the efficiency of DCC operations. The modification is proportionate, low risk, and aligned with the SEC Objectives. NPML therefore supports approval.	N/A
Calisen Asset Management Ltd	Other SEC Party	Yes	As per all our previous responses, we strongly support this proposal.	N/A

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

Question 11			
Respondent	Category	Comments	SECAS Response
Horizon Energy Infrastructure	Other SEC Party	The charging period proposed by DCC is less than 3 years, ideally this should be at least 3 years. The process for changing the report going forward needs more detail.	The SEC Change team will provide this feedback to the Proposer for consideration.
Centrica Smart Meter Assets	Other SEC Party	See above comment (Question 5) on whether this means the cost of the report will increase.	The SEC Change team will provide this feedback to the Proposer for consideration.
Northern Powergrid Metering Ltd	Other SEC Party	N/A	N/A
Calisen Asset Management Ltd	Other SEC Party	Calisen consider that data currently available to suppliers should also be available to MAPs to help manage portfolios, resolve issues and keep smart meters installed. We suggest further details need to be agreed and added to the Reporting Process Document to determine: • If one party wants a change to be made, how will this be shared with all other parties? Does the DCC want individual suggestions into the regulation mailbox? • Or will the CMAP population make suggestions and one and manufacturers as one?	The SEC Change team will provide this feedback to the Proposer for consideration.

Question 11			
Respondent	Category	Comments	SECAS Response
		- How many parties will need to agree to the proposal for it to be progressed? I.e. this cannot be one and should be a representative number from across everyone that takes the report - How frequently can requests be made?	