

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

# MP304 ‘Scheduling Services for SMETS1 Devices’

## Annex E

## Refinement Consultation responses

### About this document

This document contains the full non-confidential collated responses received to the MP304 Refinement Consultation.

### Summary of responses



## Refinement Consultation

SECAS received three responses to the Modification Report Consultation. All three (all Large Suppliers) believed that the modification should be approved. They all considered the modification better facilitated SEC Objective (a)<sup>1</sup>. One respondent also believed that the modification better facilitated Objectives (b)<sup>2</sup> and (g)<sup>3</sup>.

---

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

<sup>2</sup> 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.

<sup>3</sup> 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                                                                                                                                                                                                                                                                                                           |
| <b>EON</b>         | Large Supplier | Yes      | Assuming it was implemented ahead of the change freeze and assuming Service Users utilised the new scheduled SR for daily reads etc.                                                                                                                                                                                |
| <b>Utilita</b>     | Large Supplier | Yes      | The proposed solution would resolve the identified issue as long as the DCC receives the engagement and reduction in on demand SRVs proposed. We are encouraged by the DCCs approach to customer engagement in this matter and confident there will be a significant cost avoidance delivered by this modification. |
| <b>British Gas</b> | Large Supplier | Yes      | -                                                                                                                                                                                                                                                                                                                   |

## Question 2: Do you agree that the legal text will deliver MP304?

| Question 2  |                |          |                                                                                                                                                                                                        |
|-------------|----------------|----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent  | Category       | Response | Rationale                                                                                                                                                                                              |
| EON         | Large Supplier | Probably | Although it was stated in the business requirements, I couldn't see any draft legal text that would encourage/force Service Users to actually use the scheduling to achieve the expected cost savings. |
| Utilita     | Large Supplier | Yes      | The drafted legal text would deliver the proposed solution                                                                                                                                             |
| British Gas | Large Supplier | -        | Not reviewed                                                                                                                                                                                           |

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

| Question 3         |                |          |                                                                                                                                                                                                                                       |
|--------------------|----------------|----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response | Rationale                                                                                                                                                                                                                             |
| <b>EON</b>         | Large Supplier | Yes      | No further comments                                                                                                                                                                                                                   |
| <b>Utilita</b>     | Large Supplier | Yes      | We recognise the need for an expedited implementation timeline for this modification in order to have it approved to be implemented into the current DSP.                                                                             |
| <b>British Gas</b> | Large Supplier | Yes      | Provided that those service users who are sending 4.3s overnight can be encouraged to switch these to scheduled. This is an unusual mod, as it does require a third party to do something voluntarily, in addition to the DCC change. |

## Question 4: Will there be any impact on your organisation to implement MP304?

| Question 4         |                |          |                                                                                                                                                                                              |
|--------------------|----------------|----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response | Rationale                                                                                                                                                                                    |
| <b>EON</b>         | Large Supplier | Yes      | Changes to operating processes to use the new scheduled SR                                                                                                                                   |
| <b>Utilita</b>     | Large Supplier | Yes      | This would require significant development work to allow the scheduling of this SRV, as well as changes to our orchestration to cease sending the on-demand version automatically each night |
| <b>British Gas</b> | Large Supplier | -        | -                                                                                                                                                                                            |

## Question 5: Will your organisation incur any costs in implementing MP304?

| Question 5         |                |                               |                                                                                                                                                                                                                                                                                                                                  |
|--------------------|----------------|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response                      | Rationale                                                                                                                                                                                                                                                                                                                        |
| <b>EON</b>         | Large Supplier | £50,000-249,000               | The above is only a guess due to the very limited time available to respond. We cannot foresee any cost savings at this time other than on DCC pass-through charges as answered in question 6.                                                                                                                                   |
| <b>Utilita</b>     | Large Supplier | £1-£49,000 costs, £0 benefit  | We would require significant IT development to uplift DUIS, allow the use of SRV 5.1 to schedule these SRVs, as well as changes to cease sending SRV 4.3 nightly. The cost savings we would see are part of the central cost avoidance noted within the modification report – there are no additional direct cost savings to us. |
| <b>British Gas</b> | Large Supplier | £1-£49,999 costs, £0 benefits | There may be some very minor implementation costs to update DUIS and any accompanying paperwork.                                                                                                                                                                                                                                 |

## Question 6: Will there be any benefit to your organisation in implementing MP304?

| Question 5         |                |                  |                                                                                                                                                                                                |
|--------------------|----------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response         | Rationale                                                                                                                                                                                      |
| <b>EON</b>         | Large Supplier | £500,000 or more | The above is only a guess due to the very limited time available to respond. We cannot foresee any cost savings at this time other than on DCC pass-through charges as answered in question 6. |
| <b>Utilita</b>     | Large Supplier | -                | This question seems to be a duplicate of Question 5 – please refer to the previous question.                                                                                                   |
| <b>British Gas</b> | Large Supplier | -                | -                                                                                                                                                                                              |

## Question 7: How long from the point of approval would your organisation need to implement MP304?

| Question 6         |                |             |                                                                                                                        |
|--------------------|----------------|-------------|------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response    | Rationale                                                                                                              |
| <b>EON</b>         | Large Supplier | 6-12 months | The above is only a guess due to the very limited time available to respond                                            |
| <b>Utilita</b>     | Large Supplier | 6-12 months | This will give us sufficient time to assess the required work and prioritise within existing workloads and programmes. |
| <b>British Gas</b> | Large Supplier | -           | -                                                                                                                      |

## Question 8: Do you believe that MP304 would better facilitate the General SEC Objectives?

| Question 7  |                |                  |                                                                                                                                                                                                                                      |
|-------------|----------------|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent  | Category       | SEC Objective(s) | Rationale                                                                                                                                                                                                                            |
| EON         | Large Supplier | a, b, g          | Based on cost savings                                                                                                                                                                                                                |
| Utilita     | Large Supplier | a                | We believe that the implementation of this modification will allow the DCC comms network to operate more efficiently by allowing these SRVs to be spread across the length of the scheduled window rather than being sent On Demand. |
| British Gas | Large Supplier | a                | -                                                                                                                                                                                                                                    |

## Question 9: Do you believe there will be any impacts on or benefits to consumers if MP304 is implemented?

| Question 8  |                |          |                                                                                                                                     |
|-------------|----------------|----------|-------------------------------------------------------------------------------------------------------------------------------------|
| Respondent  | Category       | Response | Rationale                                                                                                                           |
| EON         | Large Supplier | Yes      | The savings on pass-through costs from DCC mean that the excessive SMS overage charges would not need to be passed on to consumers. |
| Utilita     | Large Supplier | No       | There should be no direct impacts to consumers if this modification is approved.                                                    |
| British Gas | Large Supplier | No       | -                                                                                                                                   |

## Question 10: Noting the costs and benefits of this modification, do you believe MP304 should be approved?

| Question 9         |                |          |                                                                                                                                                                                                                                                                                                                               |
|--------------------|----------------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent         | Category       | Response | Rationale                                                                                                                                                                                                                                                                                                                     |
| <b>EON</b>         | Large Supplier | Yes      | Caveated that the least risky solution would be for DCC to negotiate the SMS overage charges down to a fraction of their current costs with the Mobile Network Operators.                                                                                                                                                     |
| <b>Utilita</b>     | Large Supplier | Yes      | We recognise there is resistance within wider Industry around implementing changes that only affect SMETS1 meters, however, given the significance of the potential cost avoidance inherent in this modification we believe the benefits of implementation outweigh the costs, and that this modification should be approved. |
| <b>British Gas</b> | Large Supplier | Yes      | -                                                                                                                                                                                                                                                                                                                             |

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

| Question 10 |                |                                                                                                                                                            |
|-------------|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Respondent  | Category       | Comments                                                                                                                                                   |
| EON         | Large Supplier | N/A                                                                                                                                                        |
| Utilita     | Large Supplier | This modification will bring SMETS1 processes in line with the equivalent SMETS2 processes, and make the future transition from SMETS1 to SMETS2 smoother. |
| British Gas | Large Supplier | We agree with the comments from TABASC that a 2.5p/SMS charge seems high, and we would propose DCC tried to renegotiate this.                              |