

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.

MP247 ‘Future Dating of Service Requests for SMETS1 Devices’

Annex G

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP247 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	Please see our comments in our answer to the last question.	-
EDF Energy	Large Supplier	Yes	This could help smooth bottlenecked SRs during high traffic events like Mass Price Changes, however the last few price change events have been completed relatively smoothly and is there still a problem?	This modification aims to provide a longer-term solution to the underlying issue of potential traffic congestion during high-demand periods. With frequent price change events becoming more common and millions of SMETS1 Devices still in operation, this modification will help ensure continued reliability in managing Service Requests, reducing risks for future disruptions.
Utilita Energy Ltd	Large Supplier	Yes	While we believe that both solutions would effectively resolve the identified issue, we believe that the wider range of SRVs allowed in the initial solution presents the greatest flexibility in ensuring customer meters have the correct prices, mode and settings at all times in order to ensure continuity of supply, accurate billing and fulfilment of the terms of service the customer signed up to while also giving suppliers the tools necessary to reduce their	SECAS notes preference of having the Proposed Solution.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			impact on times of peak traffic load across the DCC System .	

Question 2: Do you agree with the proposed implementation approach?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	
EDF Energy	Large Supplier	No	The proposed solutions includes service requests that there is no need to include in this modification e.g. 11.3, 6.4.1, 1.6 and it is very expensive for a solution that only benefits SMETS 1 meters that will all be removed in coming 5-10 years as the 2G/3G networks are switched off.	While the Service Requests highlighted may not appear to be essential, they offer valuable operational flexibility for Suppliers. These Service Requests allow for efficient updates and configurations that can help manage the performance and operation of SMETS1 Devices during the remaining period of their use. The DCC have stated the costs may seem significant particularly as the solution is focused on SMETS1 Devices, however, this is a strategic investment aimed at preventing operational challenges during high-traffic events e.g. price changes. It is important to note there are still millions of SMETS1 Devices currently in use. This modification helps to manage the

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
				operational demands for the remaining lifespan of SMETS1 Devices. The Alternative Solution allows DCC Users to send Future Dated Service Requests to SMETS1 Devices without being held at the DSP, for SRV 1.1.1 'Update Import Tariff (Primary Element)' and SRV 1.2.1 'Update Price (Primary Element)'.
Utilita Energy Ltd	Large Supplier	Yes	-	-

Question 3: Will there be any impact on your organisation to implement MP247?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	Yes	Our current system cannot future date commands to SMETS 1 meters. There would need to be development work to enable this.	-
Utilita Energy Ltd	Large Supplier	Yes	We would need to review our orchestration for processes utilising the SRVs that are being enabled to be held on devices as part of this modification and determine if that orchestration required adjustment to utilise the new capabilities. This would also impact the way in which we handle price cap update events, as we would be able to utilise future dated SRVs in the leading days\weeks on our enrolled SMETS1 portfolio and reduce the on the day burden.	-

Question 4: Will your organisation incur any costs in implementing MP247?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	£250k-£500k	There will be costs associated with this change due to the systems changes involved. At this point, as the problem hasn't been properly sized it is very difficult to give an accurate estimate of the costs.	-
Utilita Energy Ltd	Large Supplier	<£50,000	These changes would be relatively minor changes to operational processes but could largely be accomplished by reusing existing code and logic.	-

Question 5: How long from the point of approval would your organisation need to implement MP247?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	6 months+	At this point we are not sure of the costs/changes that would need to be made, An 6-9 months is an initial estimate.	-
Utilita Energy Ltd	Large Supplier	3 months	This timescale would give us a sufficient time to undertake the analysis outlined in Q3, perform the necessary development work resulting and fully test those changes.	-

Question 6: Do you believe that MP247 would better facilitate the General SEC Objectives?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	No	While it may allow the DCC to handle large traffic events slightly more easily, the amount of time and costs required to implement it will prevent suppliers working on more potentially more important or innovative products (as required by SEC Objective C1.1.(e)).	SECAS notes the response provided
Utilita Energy Ltd	Large Supplier	Yes	We believe this modification better facilitates General SEC Objectives (a) and (c). By allowing SRVs to be held at a device level and executed at a future time this would allow traffic to be more evenly spread across the DCC System and allow these messages to be sent at non-peak times. Further, by having these stored on the device this reduces the risk of outage, maintenance or other downtime delaying the release of these messages by the DSP, allowing for customer devices to always reflect the most up to date prices and configurations. This would also reduce the risk of congestion during price change events, as we have seen failure of regular vend activity due to system congestion. Allowing a portion of this type of traffic to be sent ahead of time and held on device would free up the capacity usually utilised to allow	SECAS notes the response provided

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			better traffic flow of all SRVs – not just those that are being affected by this modification.	

Question 7: Do you believe there will be any impact on or benefits to consumers if MP247 is implemented?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	Yes	Some customers might have their price change arrive sooner, but the benefits are very marginal and do not outweigh the costs.	-
Utilita Energy Ltd	Large Supplier		This modification is a critical one for Pre Pay consumers with an enrolled SMETS1 meter, as due to the real time nature of charging of these devices, any delay in applying a price change has a material impact on the customers balance on the meter and can result in complex refund\additional charges being required to balance these delays. Additionally, by reducing the volume of traffic passing through the network on these days, this will reduce congestion-based failures resulting in a better experience for consumers and reduced failure of other commands.	-

Question 8: Noting the costs and benefits of this modification, do you believe MP247 should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	
EDF Energy	Large Supplier	No	There is no real need for it as the last few price change events have worked relatively smoothly. And the costs of implementation are too high given the expected lifespan of the remaining SMETS 1 meters.	The DCC have stated the costs may seem significant particularly as the solution is focused on SMETS1 Devices, however, this is a strategic investment aimed at preventing operational challenges during high-traffic events e.g. price changes. It is important to note there are still millions of SMETS1 Devices currently in use. This modification helps to manage the operational demands for the remaining lifespan of SMETS1 Devices.
Utilita Energy Ltd	Large Supplier	Yes	This modification would act as a key component in traffic management and capacity relief, acting to safeguard the overall level of service across the entire system by reducing the volume of commands being sent at critical times – such as price cap update events. This also reduces the risk that these activities have a knock-on effect on day-to-day activities.	SECAS note the response provided.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			Further, this is a key piece of functionality in ensure that Pre Pay customers are not financially disadvantaged by price change updates.	

Question 9: Noting the costs and benefits of this modification, do you believe that only some/all cohorts should be included in the solutions put forward?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
EDF Energy	Large Supplier	N/A	We do not support this for any SMETS 1 cohorts	While SMETS1 installations are decreasing, a substantial number of these Devices will remain operational for the next decade. Therefore, optimising SMETS1 performance remains important in the short term. This modification is designed to ensure smoother operations for SMETS1 Devices during the transition period, particularly in high-traffic scenarios.
Utilita Energy Ltd	Large Supplier	MOC only	While we believe that this functionality provides critical traffic management benefits across all cohorts, we recognise the high costs associated. If the same traffic management and congestion reduction benefits could be realised for MOC by implementing either solution for that cohort alone, we would welcome SECAS or DCC facilitating a session connecting other interested Users to discuss this	

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

Question 10			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	We are not fully up to speed on the full technical details of this proposed modification, but had the following comments: - This seems an extremely expensive modification, for both options under consideration. Do we have an estimate yet for the expected additional regression testing, as this will make the costs higher still? - We are not clear if this modification is definitely still needed. Have there been issues with SMETS1 capacity in the more recent Price Cap Events, or has the DCC Guidance (currently voluntary, but about to be made mandatory under MP253) helped? Is this modification still needed alongside the measures in MP253? If the modification is only implemented in June 2026 or June 2027, has the business case been adjusted to reflect the expected falling number of SMETS1 meters within a few years?	The Preliminary Impact Assessment only contains Design, Build and PIT costs. The DCC have indicated that the Proposed Solution and Alternative Solution would expect to incur significant regression testing costs for S1SPs. MP253 has been approved at the October 2024 Change Board and will be implemented in the November 2024 SEC Release. The SEC Obligation relating to this modification will become active on 7 August 2025 to allow a 9 month grace period. While SMETS1 installations are decreasing, a substantial number of these Devices will remain operational for the next decade. Therefore, optimising SMETS1 performance remains important in the short term. This modification is designed to ensure smoother operations

Question 10			
Respondent	Category	Comments	SECAS Response
			for SMETS1 Devices during the transition period, particularly in high-traffic scenarios
EDF Energy	Large Supplier	-	-
Utilita Energy Ltd	Large Supplier	-	-