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MP181

‘Meter Asset Provider and Device Manufacturer access to asset related data held by the DCC’

Modification Report

Version 1.1

19 July 2022



About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has four annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex C** contains the full Data Communications Company (DCC) Preliminary Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation.

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1. Summary

This proposal has been raised by Lynne Hargrave on behalf of Calvin Asset Management Ltd.

Meter Asset Providers (MAPs) and Device Manufacturers wish to access smart asset-related data held by the DCC. This will allow the MAP and Manufacturer to assess and manage asset health for any smart assets it owns or has manufactured. This will enable MAPs to work with Manufacturers to manage their asset portfolios effectively and efficiently, leading to reduced volumes of faulty Devices due to out of date firmware or failed Device commissioning.

Under the SEC, the inventory data requested by MAPs and Manufacturers is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3.

Initially, the Proposed Solution only allowed MAPs to access the dataset. However, following the request of Device Manufacturers, the scope of this proposal will now allow Device Manufacturers to have access to the same dataset, provided that they are the Manufacturer of the asset.

This modification is a text only change, with DCC development costs being incorporated into the charge that MAPs and Manufacturers will be subject to in order to use the service. This modification will impact the DCC, Device Manufacturers and MAPs. Implementation is targeted for the November 2022 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

The DCC holds data relating to smart assets in the Smart Meter Inventory (SMI). This asset-related inventory data is provided to the DCC by Suppliers, as DCC Users, as part of their obligations as Parties to the SEC.

MAPs need access to up to date data to manage the health of their assets. To cover a full MAP portfolio, each MAP would need to ask each Supplier for the data, who in turn would need to request the same data from the DCC to pass back to the requesting MAP. This would mean that each MAP would need to issue over 70 requests for data every month and every Supplier would need to respond to numerous MAP requests each month by requesting the data from the DCC and then passing the data back to the MAPs. This method of working is deemed unsustainable by the MAP, the DCC or Suppliers due to the volume of requests and responses that will need to be exchanged on a regular basis.

During the Development Stage, the DCC stated that this inventory data is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3. These are as follows:

- (a) expressly permitted or required by the DCC Licence;
- (b) necessary for the exercise by the DCC of any of its obligations under the Electricity Act, the Gas Act, the DCC Licence, or this Code;
- (c) made or given in accordance with the Authority's prior written consent;

- (d) such Confidential Information is already available in the public domain other than as a result of a breach by the DCC of Section M4 and/or the DCC Licence; or
- (e) such Confidential Information is already lawfully in the possession of the DCC otherwise than as a result (whether directly or indirectly) of a breach of this Code and/or the DCC Licence (but without prejudice to any obligations to which the DCC is subject in respect of the use or disclosure of such Confidential Information under the arrangements relating to such lawful possession).

SEC Lawyers have stated that the data can be disclosed if the DCC are carrying out 'permitted business'.

What is the issue?

MAPs and meter Manufacturers wish to access smart asset-related data held by the DCC and not the information held in Supplier systems (which may or may not be the same as the DCC held data) to allow them to assess and manage asset health for any smart assets they own or have built. The data items that they wish to access are:

- Global Unique Identifier (GUID)
- Device type, manufacturer and model
- Device firmware version
- Device status
- Communication Service Provider (CSP) region
- Supplier ID (this has been added following the request of meter Manufacturers)
- Communications Hub make, model and firmware version (this has been added following the request of the Energy and Utilities Alliance (EUA))

The asset related data required by MAPs and meter Manufacturers is held in the DCC Systems and is managed by the DCC System. The data requested relates only to the metering asset located at a site. The MAPs have also requested Supplier ID data which will enable MAPs and Manufacturers to be able to contact the Responsible Supplier and work with that Supplier where a problem is identified with the firmware or commissioning of a Device.

What is the impact this is having?

MAPs and Manufacturers are currently unable to access DCC held data relating to the assets that they own (MAPs) or that they built (Manufacturers). This limits their ability to manage their asset portfolios effectively and efficiently, leading to increased volumes of faulty Devices due to out of date firmware or failed Device commissioning. MAPs and Manufacturers are seeking access to firmware data and DCC status information which will allow them to work with Responsible Suppliers to help identify and facilitate firmware updates and Device commissioning. This would reduce the risk that Devices provide a diminished smart service to the end consumers.

Impact on consumers

With MAPs and Manufacturers not being granted access to the data they require, consumers may be left with Devices that are not carrying up to date firmware and may display faulty behaviour, or Devices remaining in a non-commissioned state.

3. Solution

Proposed Solution

SEC legal text

This modification will implement a new Explicit Charging Metric that will be used by the MAPs and Manufacturers who wish to receive reports on the Devices they either own or have manufactured containing the agreed datasets. The actual mechanism for creating and delivering the reports will be developed by the DCC outside of the modification.

Providing the reports

Please note that this is for information only, as the DCC will develop this mechanism outside of this modification.

To facilitate the Proposer's request, the DCC will provide a service that will disclose asset-related data to MAPs and Manufacturers that choose to use the service. This data may be requested on a regular basis such as monthly or quarterly, or also as an ad-hoc request, at the discretion of the Party. To use the service to be provided by the DCC, the Party will have to pay an Explicit Charge.

For the DCC to determine that the MAP is the asset owner, the MAP will be requested to provide proof that they are the owner of the asset via SharePoint. The Proposer has advised that the most efficient way to provide the DCC with the required proof will be to upload a list of the GUIDs of the assets they are responsible for to the DCC SharePoint. The DCC will then validate the GUIDs provided before disclosing the data. The DCC has stated that MAPs will need to ensure a single .csv file containing the GUIDs of Devices they are responsible for is uploaded to the DCC SharePoint in advance of when the report is to be produced. This file will be processed by DCC Technical Operations Centre (TOC) (now known as the Data Science and Analytics Team).

This proof of asset ownership is not necessary for Manufacturers as the DCC will be able to refer to the Manufacturer ID located within the Central Products List (CPL) entry for the relevant Device model.

The DCC has advised that the data is readily available through the DCC TOC. The reports will be generated and provided as a single compressed zip file. This file will contain a single .csv file containing the required dataset. The zip file will be uploaded to the appropriate MAP or Meter Manufacturer's dedicated section of the existing DCC SharePoint location or through a Secure File Transfer Protocol (SFTP) on a fixed date of the month or fixed Working Day of the month to be agreed with the Party. The Party will also be notified via email that the report has been produced.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers		Flexibility Providers

This modification will impact MAPs (who can also act as Meter Installers) and Device Manufacturers as they will be able to request the relevant report from the DCC to better understand the health of smart meters across the country. Please note that some MAPs also install meters.

The DCC will also be impacted as it will need to produce the reports at the TOC, share the reports, and then bill the recipient through the Explicit Charge.

DCC System

The DCC has reviewed and concluded that the business requirements can be met in full and delivered using existing available data, although there will be a direct impact on support and maintenance.

The DCC has advised that if further changes to the requested dataset are identified, they will be separated out with individual DCC Change Requests sent to the relevant Service Providers.

The DCC has also stated that currently it does not have access to data to allow independent validation of whether a MAP owns a particular Device. However, the implementation of the Faster Switching programme may provide this data. To validate asset ownership, the DCC will check for duplicates on GUID lists provided by MAPs.

The full impacts on DCC systems and DCC's proposed testing approach can be found in the DCC Preliminary Assessment response in Annex B.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Section K 'Charging Methodology'
- Schedule 7 'Specimen Enabling Services Agreement'

The changes to the SEC required to deliver the proposed solution can be found in Annex C.

Consumers

This modification will have a positive impact on consumers as the Proposed Solution will allow MAPs and Manufacturers to better understand the health of Devices installed at consumers' premises. Suppliers may then be informed of optimum Device / firmware combinations that will better serve the consumer.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

During solution development it was believed that the set-up costs would need to be paid for through the modification and a Preliminary Assessment was performed. However, once the DCC and the Proposer agreed that the reports would be paid via an Explicit Charge, it was agreed that the set-up costs would initially be borne by the DCC and recouped gradually via the Explicit Charge. Therefore, **there are no DCC costs directly associated with this modification** as it will recoup the costs via a new Explicit Charge. The Preliminary Assessment stated that the build cost of the full reporting mechanism is between £45,000 - £65,000.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

Refinement Consultation respondents anticipate little to no costs associated with this modification apart from the cost of the reports, provided they use the service. The Proposer added that the benefit of obtaining the information outweighs the charges associated with this modification.

Report costs

The DCC has advised that the monthly reports will have a rough order of magnitude (ROM) cost of £1,000 per report. The DCC also commented that the ROM cost for ad-hoc requests will differ slightly from this figure. During a Working Group session, the DCC also advised that the costs will be reviewed annually, and potentially amended depending on how frequently the service is used and a review of the charging statement.

6. Implementation approach

Agreed implementation approach

The Change Sub-Committee (CSC) agreed an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 3 August 2022; or
- **23 February 2023** (February 2023 SEC Release) if a decision to approve is received after 11 August 2022 but on or before 24 November 2022.

The DCC has advised that it requires a three-month lead time to implement the required functionality at the TOC and set up the Explicit Charge to provide the service to Parties. The DCC added that it will commence building the mechanism once the modification has been approved (not after implementation). The three-month lead time required by DCC matches the maximum lead time required by SEC Parties, as stated in the Refinement Consultation responses.

7. Assessment of the proposal

Observations on the issue

During the Development Stage, SECAS asked the Proposer whether Suppliers could provide the data requested to MAPs through their back-office systems. The Proposer stated that this was considered in a DCC data sharing consultation. The results of this consultation are yet to be published. MAPs are already in the position where they can ask Suppliers for this data. However, each MAP would need to issue over 70 requests for data every month and every Supplier would need to respond to numerous MAP requests each month by requesting the data from the DCC and then passing the data back to the MAPs. This method of working is deemed unsustainable.

Potential security concern

The Security Sub-Committee (SSC) Chair commented that, in theory, an individual could sign up to the SEC as an Other SEC Party and pay to use the DCC service to access the data which could be a potential security concern. The Proposer agreed that this is a potential security risk and so to mitigate the risk, the party wishing to access the data may have to prove that they are the asset owner or that they built the asset. This was agreed by the Working Group. For MAPs, this will be through providing

the DCC with a GUID list, similar to the process currently undertaken when requesting data from Xoserve. The DCC will be able to refer to the CPL to ensure that the correct Manufacturer has access to the reports.

Confidentiality

The Sub-Committee Chairs are of the opinion that the current data set requested is not considered confidential. They commented that data is only confidential when the data enables the Party to identify an individual customer. The Proposer agreed that the data is not confidential but advised that the DCC believed otherwise. The SEC Lawyer confirmed that the data can be disclosed if the DCC is carrying out 'permitted business'. The DCC has now agreed with this view.

Accessing the data

The Sub-Committee Chairs also advised that the service wouldn't necessarily be exclusive to MAPs due to 'Meter Asset Provider' not currently being a defined term within the SEC. The Proposer agreed that the legal text will detail that the data can only be disclosed to the asset owner or Manufacturer who built the asset.

Methods to obtain the data

During the Development Stage, SECAS advised that there may be multiple ways of accessing the data, such as using an Explicit Charge set out into the SEC or Elective Communication Service (ECS) (an ECS was discounted as this relates to a service that communicates with the Smart Metering Wide Area Network (SM WAN)). The Proposer is aware that there is also an opportunity to access the data through Other Users¹ via the DCC and that some MAPs already use these services. The Proposer was concerned that the DCC could end this service due to its previous perception that the data was confidential.

During the Development Stage, an Other User commented that if the data was obtained from the DCC, it could have a negative impact on their business model. The Proposer confirmed that they are aware that Other Users can provide asset related data and they currently utilise this service. They stated that if a commercial provider has developed a pay-for service that is more cost efficient than the DCC information, then MAPs are likely to use these third-party providers instead.

The Proposer has advised that there is a key point to consider when using a third-party 'pay-for' service. The rate at which Other Users can gain the data MAPs need is limited to a Meter Point Administration Number (MPxN) per day limit. This means that data can only be retrieved gradually using this route, whilst a DCC-procured report will allow a MAP to access the data in a single request. This makes the process much quicker and easier for the DCC to manage.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair also commented that the data can be obtained through a DCC TOC report as the data is already available. The Proposer advised that they have previously attempted to purchase the data from the DCC. However, the DCC previously believed that the data is confidential. Following clarification on the confidentiality issues, the Proposed Solution will utilise the TOC, and the subsequent reports will be made available through an Explicit Charge.

¹ Other Users are Users that are not an Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor, Gas Transporter or Registered Supplier Agent.

During Working Group discussions, a member commented that Manufacturers may already be able to access Supplier ID and effective from data as per the 'SEC Security Controls Framework Annex: Agreed Interpretations' document. SECAS investigated this, and the Supplier data can only be accessed by Device Manufacturers who have not signed up to the voluntary notification scheme with the SSC.

Solution development

The Proposer's initial solution

MAPs have requested that the DCC provide a 'pay-for' data service to MAPs and Manufacturers whereby the Parties taking the service will meet the full cost of providing the service. As a result, there would be no cost implications for DCC Users. However, a text change to the SEC will be required to allow this service to be provided and charged as an Explicit Charge.

Please note that the proposal was initially raised specifically for MAPs, and then during the Development Stage the scope of this proposal was widened allow Device Manufacturers to have access to asset related data. This resulted in the addition of the Supplier ID and effective from date, plus Communications Hub make, model and firmware version data items to the list.

Building the solution

The Working Group agreed that the mechanism for providing the reports will sit outside of the SEC. This modification will be a legal text change to facilitate the disclosure of and payment for the information. The DCC advised that the mechanism to provide the reports will take three months to develop, which will commence if and when the modification is approved. The anticipated build cost is approximately £45,000 - £65,000 (as stated in the DCC Preliminary Assessment) which will be recouped through the charging mechanism. The cost of the reports will be reviewed every April after implementation. The DCC stated that if the modification is implemented in the November 2022 SEC Release, MAPs and Manufacturers will not be charged for the reports as they will validate the service. Charging for reports will commence in April 2023.

Who has access to the reports?

The Proposer and SECAS engaged with two meter Manufacturers to discuss the details of widening the scope to enable Manufacturers to access the same dataset as requested by MAPs.

The Manufacturers stated that gaining access to the dataset (provided they are the Manufacturer of the Device) will be beneficial as it would provide insight into the success of meter updates. They commented that there are approximately 69,000 Device model combinations. They added that accessing this data will allow Manufacturers to better understand the scale of the issue of out-of-date meters and firmware versions. The Manufacturers also advised that gaining access to Supplier IDs would increase the likelihood of them using the service.

Data set additions

The Manufacturers advised that it would be advantageous to know which Suppliers implement specific firmware versions as they will be able to address upgrade paths. This will be of benefit to the Suppliers as it will allow for better support of meters in the field and Manufacturers will be able to

provide support to Suppliers with below optimum Device / firmware versions. The most efficient solution is by gaining access to the Supplier ID of the asset. Without the Supplier ID, Manufacturers would have to contact each MAP to understand who supplies each asset.

A meter Manufacturer also suggested widening the scope to allow data relating to Communications Hub firmware versions to be disclosed. This extra detail will enable MAPs and Manufacturers to further pinpoint issues on specific Device and firmware version combinations. They advised that there are approximately 60,000 Device / firmware version combinations currently in the field. Having access to this data will enable the Manufacturer to better understand the scale of an issue. The Proposer commented that this would be decided by the Working Group. The agreed data items have been captured in the draft legal text. The Proposer also commented that if any Party wished to expand the scope further, they would have to do so through a subsequent SEC Modification.

The Proposer also clarified that the data they wish to obtain is purely asset-related data and not Supplier or consumer data.

Devices subject to the reporting

During the Refinement Process, MP181 was discussed at a Joint Meter Manufacturer (JMM) meeting with members from the EUA and the British Electrotechnical and Allied Manufacturers' Association (BEAMA). The attendees were supportive of the modification and raised a few points for clarification.

The JMM asked whether the modification would disclose data for only installed and commissioned Devices or all Devices including those that are not installed but have been pre-notified by the Supplier. The Proposer confirmed that this modification will apply to all Devices on the SMI and that the status field (from the data produced by the DCC) will inform the MAP or Manufacturer whether a Device has been installed and commissioned or decommissioned. They elaborated that the solution must include uncommissioned meters as part of the reason for requesting the data is so that MAPs can see when a Device isn't installed or isn't commissioned and then follow this up with the Supplier.

Data accuracy

Suppliers were generally supportive for the Supplier ID and effective from dates to be made available through the Proposed Solution. However, they advised that the accuracy of the data produced by the DCC may be poor. A Working Group member added that the data they had received for reports relating to Communications Hub ownership were up to 70% inaccurate. The Proposer advised that the data is sourced by the DCC through the registration data. A meter Manufacturer representative suggested that this information is provided with a caveat that states that accuracy is not guaranteed. However, registration data still appears to be the most accurate method of understanding which Supplier supplies a Device, as it is unlikely a gaining Supplier will contact the Manufacturer to update their records. A Large Supplier representative added that the data could be validated by Suppliers to maintain a higher level of accuracy.

GUID list submission

For MAPs to receive the DCC-produced report for their assets, they must submit a list of GUIDs to the DCC which will then be verified.

SECAS initially suggested that to uphold the highest level of accuracy, MAPs should upload a GUID list daily. This is currently the case for D0353 DCC full refresh files which are uploaded every 24

hours at 6:00AM. The Proposer commented that there is no benefit in MAPs providing a GUID refresh every day and the cost and effort of doing so would most likely outweigh the benefits of the reporting service. The DCC added that it would be more reasonable for MAPs to submit a monthly file.

The Proposer would like an efficient process for providing the GUIDs to the DCC and suggests providing the updated list each time they request a report. The MAP will also warrant that the GUIDs are owned by them.

In terms of validating the submitted GUID lists, the DCC has advised that it would check GUIDs for duplication. If it receives the same GUID from two different MAPs, the data would not be presented to either MAP, and the DCC would flag to them both to investigate. This is the same process that is currently used with the Xoserve service. The DCC also advised that following the introduction of the Faster Switching programme, it should have access to a greater pool of data that will add a further step of validation.

The Proposer has stated that there is no benefit to a MAP to receiving data for GUIDs that are not owned by the MAP if an erroneous GUID is provided (in good faith) by a MAP. A MAP cannot tell who the GUID is owned by, so it provides no commercial benefit to the MAP erroneously receiving the data. This scenario should be mitigated provided that basic checks are carried out.

During discussions at a Community of Meter Asset Providers (CMAP) meeting, it was agreed that in the case of a duplicate GUID, the DCC would send one email to both MAPs in order to resolve the issue. This is the most simple and effective way of resolving the issue and the CMAP Chair advised that there is no commercial sensitivity concerns with this approach.

Data held within DCC Systems

During Working Group discussions, a Large Supplier representative suggested that costs associated with Suppliers uploading data to the DCC Systems should be considered when assessing this modification. Data has been uploaded since the go-live of the DCC, and the Proposer has advised that this data will have to be uploaded regardless of this modification's implementation.

At a subsequent session, the Large Supplier representative commented further that Parties have and continue to make a material contribution by uploading data to the SMI, and this change will mean third parties (such as MAPs) can access the data for marginal costs. They stated that this approach will hinder the possibility of the DCC eventually becoming a free service. A Working Group member commented that it would be difficult to quantify the costs associated with uploading current and historic data within the SMI and DCC Systems.

Costs associated for Parties to obtain and upload data to the SMI and any potential reimbursement is deemed to be outside of this modification. If a Party would like to investigate potential changes to the current charging methodology, they can do so through raising a separate modification.

Please note that this modification is a legal text-only change and will not incur any DCC System costs. The cost to develop the reporting mechanism is anticipated to cost approximately £45,000 - £65,000 (as stated in the DCC Preliminary Assessment), which will take place outside of this modification, and will be recouped through the Explicit Charge.

Use of data

The Working Group requested that MAPs explicitly state that they would not use Supplier ID and effective from data for charging purposes and this be highlighted in the Modification Report. The

Proposer and another MAP representative confirmed that the data would not be used for this purpose. They further advised that as MAPs already have access to this data, this attribute would only be used by Manufacturers.

Views were received during the Refinement Consultation and at the Working Group where there were concerns that MAPs and Manufacturers could potentially sell the data they receive to a third party. The Proposer stated that this is not the intent, and a clause (H17.6) has been included within the legal text to prohibit this activity. The DCC has also advised that the reports will be marked as confidential. Clause H17.7 also states that the Party will only use the data for internal business purposes. When consulting on this clause, a Device Manufacturer commented that it was satisfactory, and the Proposer stated that the data will be used for maintaining an up-to-date status record of their assets.

GDPR

During the Working Group, SECAS informed members of the SEC Lawyer's position that the DCC can disclose the requested data if it is carrying out 'permitted business'. A Working Group member queried whether this means that DCC can disclose any data if carrying out 'permitted business'. The DCC responded to state that the DCC cannot carry out any activities that contravene any of the General Data Protection Regulation (GDPR) principles but if it is allowed by law and codified in the SEC then the DCC could then perform the relevant activity.

REC Change Proposal R0046 – Governance of Data under the REC

During a Working Group session, a member advised SECAS to investigate Retail Energy Code (REC) Change Proposal [0046 'Governance of Data under the REC'](#), as this is looking at potential commercial advantages from disclosing data. SECAS discussed the modification with the Proposer and the REC Code Manager.

The existing data protection clauses set out under Clauses 19 and 20 of the REC Main Body are being updated, to ensure closer alignment with GDPR requirements following developments in the legal and regulatory landscape since the GDPR came into force in 2018 (including updated guidance issued by the Information Commissioners Office (ICO) and the impact of Brexit)).

The restrictions on use of data by the DCC (Clause 18 of the REC Main Body) are also being updated to reflect the controls which apply to other REC Service Providers, and to give the Retail Energy Code Company (RECCo) a gateway approval role concerning additional uses of data beyond the provision of the Centralised Registration Service (CRS). This will enable RECCo to maintain a comprehensive approach to the governance of data under the REC. The drafting is designed to ensure that in doing so, RECCo would not unreasonably withhold permission with its assessment being based on data best practice principles, and that any use or commercialisation of the data governed by the REC should be on fair, reasonable and non-discriminatory terms that are available to others.

The Proposer stated that there is no commercial advantage to be gained between MAPs and Manufacturers through accessing this data. The data will be used for information and to provide additional support to Suppliers. The REC Code Manager and SECAS concluded that there are no implications between the two industry modifications.

Refinement Consultation responses

SECAS received 14 responses to the Refinement Consultation. Thirteen of the respondents agreed with the Proposed Solution and legal text. One respondent suggested that a clause was included within the legal text to state that MAPs and Manufacturers cannot sell on the data to third parties. This was agreed by the Proposer and the Working Group and subsequently included in the final version of the legal text. Respondents also agreed with the implementation approach.

One respondent, a Large Supplier, did not approve of the cost recovery approach of the modification. They stated that it was unclear how any incurred costs would be recovered if the service was not widely used. While this is a legitimate concern, eight of the other respondents were Other SEC Parties who noted their intent to utilise the service.

8. Case for change

Business case

This modification will provide an efficient and cost-effective solution to the issue identified. The agreed process for obtaining the reports has been subject to extensive refinement to deliver the required solution. The service the DCC will provide meets the MAPs' and Manufacturers' requirements and will result in improvements over existing methods.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objectives (a)² and (c)³, as the Proposed Solution will aid Suppliers in the provision of optimum smart meter – firmware combinations. The Proposer also stated that the installation of these Devices will also allow consumers to better manage their electricity and gas usage as the Devices will provide the optimum level of performance.

Industry views

The majority (13 from 14) of Refinement Consultation respondents agreed that MP181 better facilitates SEC Objectives (a) and (c). A respondent stated that the modification will allow MAPs to ensure that their portfolio is running on the optimum firmware combinations and that meters are installed in a DCC active state. It will also allow MAPs to quickly and accurately identify any detrimental trends to ensure the SMIP is operating as planned. Another respondent stated that access to Device and firmware data will enable MAPs and Manufacturers to support the facilitation and maintenance of healthy Devices. This was the consensus across the respondents.

² Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

³ Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Views against the consumer areas

Improved safety and reliability

This modification will have a positive impact on the safety and reliability of smart metering as the MAPs and Manufacturers will be able to advise Suppliers on optimum Device – firmware combinations that will provide a high level of service to customers.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the price of consumers' bills.

Reduced environmental damage

This modification will have a positive impact on reducing environmental damage as the data can be used to identify optimum Device – firmware combinations, preventing sub-optimum combinations being installed and potentially replaced due to poor performance.

Improved quality of service

This modification will result in an improved quality of service as MAPs and Device Manufacturers will be able to advise Suppliers on optimum Device – firmware combinations.

Benefits for society as a whole

This modification will provide benefits to society as it will help ensure that the benefits of the Smart Metering Implementation Programme (SMIP) are realised.

Final conclusions

Through valuable input from the Proposer, DCC and Working Group, MP181 will deliver an efficient solution to the issue defined. The Proposer and the Working Group approved of the data items that the reports will contain for MAPs and Manufacturers to be able to advise on optimum Device combinations and monitor asset health. Through MP181, the DCC will provide a service that is of benefit to the energy industry.

Appendix 1: Progression timetable

On 21 June 2022 the CSC agreed that this modification should proceed to the Report Phase. SECAS will now issue the Modification Report Consultation (MRC) and present the responses to the Change Board who will vote on this modification under Self-Governance.

Timetable	
Event/Action	Date
Draft Proposal raised	8 Sep 2021

Timetable	
Event/Action	Date
Presented to SEC Sub-Committees for input	Sep 2021
CSC converts Draft Proposal to Modification Proposal	28 Sep 2021
Business requirements drafted with the Proposer	Oct - Nov 2021
Business requirements workshop	18 Nov 2021
Modification discussed with Working Group	1 Dec 2021
Modification discussed with SSC	8 Dec 2021
DCC Preliminary Assessment requested	15 Dec 2021
DCC Preliminary Assessment returned	26 Jan 2022
DCC Preliminary Assessment discussed with the Working Group	2 Mar 2022
Refinement Consultation	25 Apr – 18 May 2022
Modification discussed with Working Group	1 Jun 2022
Modification Report approved by CSC	21 Jun 2022
Modification Report Consultation	24 Jun – 15 Jul 2022
Change Board Vote	27 Jul 2022

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BEAMA	British Electrotechnical and Allied Manufacturers' Association
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
ECS	Elective Communication Service
CMAF	Community of Meter Asset Providers
CRS	Centralised Registration Service
CSP	Communications Service Provider
EUA	Energy and Utilities Alliance
GDPR	General Data Protection Regulation
GUID	Global Unique Identifier
ICO	Information Commissioners Office
JMM	Joint Meter Manufacturer
MAP	Meter Asset Provider
MPxN	Meter Point Administration Number
MRC	Modification Report Consultation
REC	Retail Energy Code

Glossary	
Acronym	Full term
BEAMA	British Electrotechnical and Allied Manufacturers' Association
CPL	Central Products List
CSC	Change Sub-Committee
RECCo	Retail Energy Code Company
ROM	Rough order of magnitude
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SFTP	Secure File Transfer Protocol
SM WAN	Smart Metering Wide Area Network
SMI	Smart Metering Inventory
SMIP	Smart Metering Implementation Programme
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TOC	Technical Operations Centre

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MP181 ‘Meter Asset Provider access to asset related data held by the DCC’

Business requirements – version 1.0

Annex A

About this document

This document contains the business requirements that support the solution(s) for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	The Data Communications Company (DCC) are to provide a service to Meter Asset Providers (MAPs) and Manufacturers allowing the disclosure of asset-related data
2	MAPs will be requested to provide proof that they are the owner of the asset(s) via SharePoint
3	DCC are to retrieve the dataset requested by the relevant MAP or Manufacturer
4	DCC are to provide the dataset to the relevant MAP or Manufacturer

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

This solution will be applied to Enrolled SMETS1 and SMETS2 Devices.

Please note that MP181's Proposed Solution does not impact DCC Systems. The purpose of this document is to set out the requirements that the service DCC are to provide will meet. The DCC shall then carry out a DCC Preliminary Assessment which will detail how the paid for service will function and how the costing mechanism will be calculated and charged through Explicit Charges.

2.2 Requirement 1: The Data Communications Company (DCC) are to provide a service to Meter Asset Providers (MAPs) and Manufacturers allowing the disclosure of asset-related data

During the MP181 Refinement Process, Smart Energy Code (SEC) Lawyers and the DCC agreed that the service to be provided to MAPs and Manufacturers will be categorised as an Other Enabling Service. The Proposer, after discussions with meter Manufacturers, has requested that the below datasets are made available to the relevant MAP or Manufacturer:

- Global Unique Identifier (GUID)
- Device type, manufacturer and model
- Device firmware version
- Device status
- Communications Service Provider (CSP) region
- Supplier ID and Supplier effective from date
- Communications Hub make, model and firmware version

The data may be provided via an ad-hoc request, or on a regular monthly or quarterly basis as agreed between the MAP or Manufacturer and the DCC (but no more frequently than monthly).

2.3 Requirement 2: MAPs will be requested to provide proof that they are the owner of the asset(s) via SharePoint

For the DCC to ensure that it discloses the requested datasets to the asset owner, the MAP will have to provide proof that they are the owner of the asset(s). The Proposer has advised that the most efficient way to provide the DCC with the required proof will be to upload a list of the GUIDs of the assets they are responsible for to the DCC SharePoint. The DCC shall then validate the GUIDs provided before disclosing the data.

Please note that this requirement is not necessary for meter Manufacturers as their Manufacturer ID will be contained within the Central Products List (CPL) entry for the relevant Device Model.

During the refinement of this document, the DCC has advised that it may hold MAP IDs within DCC Systems. This is to be investigated during the Preliminary Assessment.

2.4 Requirement 3: DCC are to retrieve the dataset requested by the relevant MAP or Manufacturer

Upon receiving a request from a MAP or Manufacturer to use the service (or monthly / quarterly at the discretion of the MAP or Manufacturer but no more frequently than monthly), the DCC shall carry out the necessary reporting in order to disclose the information to the MAP (provided they have proven to be the owner of the asset) or Manufacturer.

Smart Energy Code Administrator and Secretariat (SECAS) has been advised that the datasets requested by MAPs and Manufacturers can be obtained via the DCC Technical Operations Centre (TOC).

2.5 Requirement 4: DCC are to provide the dataset to the relevant MAP or Manufacturer

Once the DCC has obtained the requested data, the report shall be made available to the relevant MAP or Manufacturer. This may be through the use of DCC SharePoint as a preferred option or potentially through Secure File Transfer Protocol (SFTP). DCC shall also notify the relevant MAP that the data is available.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CPL	Central Products List
CSP	Communications Service Provider
DCC	Data Communications Company
GUID	Global Unique Identifier
MAP	Meter Asset Provider
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SFTP	Secure File Transfer Protocol
TOC	Technical Operations Centre

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MP181 ‘Meter Asset Provider access to asset related data held by the DCC’

Legal text – version 1.0

Annex B

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section A - Definitions and Interpretation

These changes have been redlined against Section A version 25.0.

Add the following definitions as follows:

<u>MAP</u>	<u>means Meter Asset Provider.</u>
<u>MAP/Manufacturer Reports</u>	<u>means the reports provided by the DCC under Section H17 (MAP/Manufacturer Reports).</u>
<u>Meter Asset Provider</u>	<u>means, in respect of a Smart Meter, the entity that makes the Smart Meter available for use by Supplier Parties (and which is usually the owner of the Smart Meter).</u>

Section H – DCC Services

These changes have been redlined against Section H version 15.0.

Add new a Section H17 as follows:

H17. MAP / MANUFACTURER REPORTS

H17.1 Subject to Section H17.2, the following entities shall be eligible to request and receive reports under this Section H17 in respect of Smart Meters: (a) the Manufacturer of the Smart Meter; and/or (b) the Meter Asset Provider of the Smart Meter.

H17.2 The DCC shall only provide reports under this Section H17 to Meter Asset Providers and Manufacturers which are either: (a) a Party; or (b) party to an agreement in the form of the Specimen Enabling Services Agreement.

H17.3 In order to receive reports in respect of a particular Smart Meter, the entity requesting the report will need to provide reasonable evidence to the DCC that such entity is the Manufacturer or Meter Asset Provider of the Smart Meter. The DCC shall not provide reports to an entity unless the DCC has obtained such reasonable evidence of such entity's status as Manufacturer or Meter Asset Provider.

H17.4 Reports under this Section H17 can be requested quarterly, monthly or on an ad hoc basis (but not more than once each month). The DCC shall provide the reports in accordance with such requests.

H17.5 Each report under this Section H17 will set out for each and every Smart Meter for which the recipient is the Manufacturer or Meter Asset Provider:

(a) Smart Meter ID;

(b) Smart Meter Type, Smart Meter Model and Manufacturer;

(c) firmware version;

(d) SMI Status;

(e) Region;

(f) the Registered Supplier(s) and its/their effective from date(s); and

(g) Communications Hub make, model and firmware version.

H17.6 The DCC shall provide reports under this Section H17 via its preferred file sharing platform, and shall mark them as confidential and not to be shared with any third party apart from the Registered Supplier Party.

H17.7 Each entity which obtains one or more reports pursuant to this Section H17 undertakes to:

- (a) only use the data contained in those reports for its internal business purposes;
- (b) not sell or commercially exploit the data contained in those reports; and
- (c) keep the data contained in those reports confidential in accordance with Section M4 (Confidentiality).

Section K - Charging Methodology

These changes have been redlined against Section K version 13.0.

Amend Section K7.5 as follows:

Explicit Charging Metrics

K7.5 The Explicit Charging Metrics for each Party and the Charging Period for each month are as follows:

- (a) ('security assessments') an obligation to pay arising during that Charging Period in respect of that Party pursuant to Section G8.51 (Users: Obligation to Pay Charges) in relation to User Security Assessments, Follow-up Security Assessments, User Security Assessment Reports or the activities of the Independent Security Assurance Service Provider;

...

- (w) ('RF Noise Testing') an obligation to pay arising during that Charging Period from the acceptance by that Party of the charges offered by the DCC to provide RF Noise Testing pursuant to Section H14.37 (Radio Frequency Noise Testing); ~~and~~

- (x) ('DCC Boxed') the number of each of the types of DCC Boxed which have been delivered to that Party during that Charging Period under Section H14 (Testing Services) and in accordance with Clause 18 of the Enduring Testing Approach Document; ~~and-~~

- (y) ('MAP/Manufacturer Reports') the number of MAP/Manufacturer reports provided to the Meter Asset Provider or Manufacturer during that Charging Period.

Schedule 7 – Specimen Enabling Services Agreement

These changes have been redlined against Schedule 7 version 9.0.

Amend schedule 1 as follows:

Schedule 1 – Enabling Services

[The Enabling Services shall comprise the provision of Test Communications Hubs in accordance with Section F10 (Test Communications Hubs). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section F10 (the Participant complying with those obligations assigned to TCH Participants).]

[The Enabling Services shall comprise the provision of either or both those Smart Meter and User System Tests described in Section H14.31(a) and (b) (Smart Meter and User System Tests) in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of SMETS1 Pending Product Combinations Tests in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of RF Noise Testing in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of Interoperability and Innovation Events in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of GFI Testing in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of DCC Boxed in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of MAP/Manufacturer Reports in accordance with Section H17 (MAP/Manufacturer Reports). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H17.]

SEC Modification Proposal, SECMP0181

Meter Asset Provider (MAP) Access to Asset-Related Data Held by the DCC

Preliminary Impact Assessment (PIA)

Version:	0.41
Date:	19th January, 2022
Author:	DCC
Classification:	DCC Public

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1 Executive Summary

The Change Board are asked to approve the following:

- Total cost to complete the Full Impact Assessment (FIA) of £20,000
- The timescales to complete the Full Impact Assessment of 30 days
- ROM costs to deliver SECMP0181 including Design, Build and PIT of between £45,000 and £65,000

Problem Statement

Meter Asset Providers (MAPs) and Meter Manufacturers wish to access smart asset-related data held by the DCC in order to allow them to assess and manage asset health for any smart assets they own. The solution proposes that the DCC Technical Operations Centre will provide reports tailored to each MAP and Meter Manufacturer.

Benefit Summary

MAPs and Manufacturers are currently unable to access DCC held data relating to the assets that they own (MAPs) or that they built (Manufacturers). This limits their ability to manage their asset portfolios effectively and efficiently, leading to increased volumes of faulty Devices due to out of date firmware or failed Device commissioning. MAPs and Manufacturers are seeking access to firmware data and DCC status information which will allow them to work with Responsible Suppliers to help identify and facilitate firmware updates and Device commissioning. This would reduce the risk that Devices provide a diminished smart service to the end consumers.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
23/12/2021	0.1	Initial version
19/01/2022	0.4	Internal review

2.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	MP181 Modification Report v0.4	SECAS	13/12/2021
2	MP181 Business Requirements v0.2	SECAS	13/12/2021
3	MP181 Preliminary Assessment Request	SECAS	13/12/2021

References are shown in this format, [1].

2.3 Document Information

The Proposer for this Modification is Lynne Hargrave on behalf of Calvin Asset Management Ltd.

The Preliminary Impact Assessment was requested of DCC on 13th December 2021.

3 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The requirements have been provided by the Smart Energy Code Administrator and Secretariat (SECAS), the Proposer, and the Working Group.

3.1 Problem Statement

MAPs and Device Manufacturers wish to access smart asset-related data held by the Data Communications Company (DCC). This will allow the MAP or Manufacturer to assess and manage asset health for any smart assets it owns or has manufactured. This will enable MAPs to work with Manufacturers to manage their asset portfolios effectively and efficiently, leading to reduced volumes of faulty Devices due to out of date firmware or failed Device commissioning.

Under the Smart Energy Code (SEC), the inventory data requested by MAPs and Manufacturers is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3.

The Proposer suggests that SEC Section M4.3 should be amended to allow the DCC to release asset-related inventory data to the MAP owning the asset and the Manufacturer who built the Device.

The Modification initially only allowed MAPs to access the dataset. However, following the request of Device Manufacturers, the scope of this proposal will now allow Device Manufacturers to have access to the same dataset, provided that they are the Manufacturer of the asset.

3.2 Business Context and Requirements

The DCC holds data relating to smart assets in the Smart Meter Inventory (SMI). This asset-related inventory data is provided to the DCC by Suppliers, as DCC Users, as part of their role as Parties to the SEC. During the Development Stage, the DCC stated that this inventory is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3. Following a discussion between the DCC and SEC lawyers, it was agreed that the data would not be deemed confidential, provided that the DCC were carrying out 'permitted business'.

3.3 Business Requirements

This solution will be applied to Smart Metering Equipment Technical Specifications (SMETS) 1 and SMETS2+ Devices.

The DCC will provide anonymised league tables for key business processes, identifying average performance per Smart Energy Code (SEC) Party for that Business Process and identifying the positioning on those league tables of only the SEC Party to whom that report is directed. DCC Customer Analytics Reporting will not share any Device Level data with any party other than the target SEC Party. Any SEC Party which is active in DCC Systems can request a new report to be added to the Customer Analytics Reporting suite, or request a change to an existing report, by making a request to a DCC group mailbox, but additional design, build and test costs will be incurred.

Ref.	Requirement
1	The DCC are to provide a service to MAPs and Manufacturers allowing the disclosure of asset-related data
2	MAPs will be requested to provide proof that they are the owner of the asset(s) via SharePoint
3	DCC are to retrieve the dataset requested by the relevant MAP or Manufacturer
4	DCC are to provide the dataset to the relevant MAP or Manufacturer

Requirement 1: The DCC are to provide a service to Meter Asset Providers (MAPs) and Manufacturers allowing the disclosure of asset-related data

During the Refinement Process, SEC Lawyers and the DCC agreed that the service to be provided to MAPs and Manufacturers will be categorised as an Other Enabling Service. The Proposer, after discussions with meter Manufacturers, has requested that the below datasets are made available to the relevant MAP or Manufacturer:

- Global Unique Identifier (GUID)
- Device type, manufacturer and model
- Device firmware version
- Device status
- Communications Service Provider (CSP) region
- Supplier ID and Supplier effective from date
- Communications Hub make, model and firmware version

The data may be provided via an ad-hoc request, or on a regular monthly or quarterly basis as agreed between the MAP or Manufacturer and the DCC (but no more frequently than monthly).

Requirement 2: MAPs will be requested to provide proof that they are the owner of the asset(s) via SharePoint

For the DCC to ensure that it discloses the requested datasets to the asset owner, the MAP will have to provide proof that they are the owner of the asset(s). The Proposer has advised that the most efficient way to provide the DCC with the required proof will be to upload a list of the GUIDs of the assets they are responsible for to the DCC SharePoint. The DCC shall then validate the GUIDs provided before disclosing the data. If two MAPs identify the same GUID, DCC will query and provide no reporting on that GUID until agreement is reached. This is not thought to be a frequent issue i.e. maybe one or two per quarter.

Note that this requirement is not necessary for Meter Manufacturers as their Manufacturer ID will be contained within the Central Products List (CPL) entry for the relevant Device Model.

Requirement 3: DCC are to retrieve the dataset requested by the relevant MAP or Manufacturer

Upon receiving a request from a MAP or Manufacturer to use the service (or monthly / quarterly at the discretion of the MAP or Manufacturer but no more frequently than monthly), the DCC shall carry out the necessary reporting in order to disclose the information to the MAP (provided they have proven to be the owner of the asset) or Manufacturer.

SECAS has been advised that the datasets requested by MAPs and Manufacturers can be obtained via the DCC Technical Operations Centre (TOC).

Requirement 4: DCC are to provide the dataset to the relevant MAP or Manufacturer

Once the DCC has obtained the requested data, the report shall be made available to the relevant MAP or Manufacturer. This may be through the use of DCC SharePoint as a preferred option or potentially through Secure File Transfer Protocol (SFTP). DCC shall also notify the relevant MAP that the data is available.

4 Description of Solution

Following workshops and consultations with Users and analysis of the Requirements above, the DCC TOC have defined a solution.

4.1 The DCC Technical Operations Centre

The DCC TOC is a 24x7x365 capability with an in-depth technical understanding of the DCC systems, process and technology to ensure the DCC service “lights stay on”. This is done by assuring, controlling, monitoring and informing the DCC network.

The TOC is staffed by dedicated DCC sourced system experts and a core network monitoring team and is located at the DCC Brabazon site. The TOC staff are technical experts that understand the DCC systems, processes and technology in sufficient level of detail to be able to provide a 3rd level support capability.

The TOC has four key objectives:

1. Service Visualisation of data sources in near real time to provide an adaptable and configurable Operations Management dashboard.
2. Operations Analytics and/ or intelligence allowing highly accurate monitoring of key DCC KPI's across all data sources, identify anomalies and generate intelligent insights through correlation/ trend analysis – and other statistical analysis models - of data sources to automate root cause identification and provide other useful insights to facilitate DCC in their operational objectives.
3. Capability for proactive alerting of operational metrics, using appropriate algorithms/ logic, that can be triggered through use of configurable thresholds and detection of anomalous behaviour, allowing DCC to pre-emptively address possible incidents.
4. Summary of key infrastructure availability across DCC supply base to provide a high-level view of service availability, subject to appropriate security constraints.

The DCC TOC will be responsible for the design, development, implementation and Business as Usual (BAU) maintenance of the solution for this Modification.

4.2 Solution Constraints and Changes

DCC have reviewed and concluded that the requirements can be met in full and delivered using existing data available in the TOC and subsequently working within the constraints of the current solution should involve no commercial change to the DCC Solution, although there will be a direct impact on support and maintenance.

Should requirements evolve as part of change to the initial requirements subsequent to this PIA, then DCC will need to evaluate principally based upon if it can be delivered from existing data available in the TOC. If further "external" data is identified, it will be separated out with individual DCC Change Requests sent to the relevant Service Providers. If the Working Group decides it wants to go ahead with this external data and associated development, it will be sent out for a FIA. It should be noted that these additional external data requests will also require contractual negotiations between the DCC and the impacted Service Providers, which is expected to take at least six months to complete.

Currently the DCC does not have access to data to allow independent validation of whether a MAP owns a particular device. However the implementation of the Faster Switching programme could provide this data.

The Charging opt in and opt out process is considered out of scope for this document, but will be investigated as part of the FIA.

4.3 Delivery, Testing, and User Acceptance

MAPs will need to ensure a single csv file containing the GUIDs of devices they are responsible for is uploaded to the DCC SharePoint by a fixed date of the month to be agreed for the FIA. This file will be processed by DCC TOC and the resulting report will be delivered back to their own dedicated section in the existing DCC SharePoint site.

It is proposed that the reporting will be delivered by the DCC TOC via a standard delivery mechanism. If not already provisioned, the DCC will provide a SharePoint site for the MAP or Meter Manufacturer which is accessible by Authorised DCC, MAP or Meter Personnel only.

The reports will be generated and results output as a single compressed zip file. This file will contain a single csv file containing the data detailed in Requirement 1. The zip file will be uploaded to the appropriate MAP or Meter Manufacturers dedicated section of the existing DCC SharePoint location on a fixed date of the month or fixed Working Day of the Month to be agreed as part of the FIA.

For Meter Manufacturers, monthly extracts will be produced for all devices relevant to the Manufacturer and will be delivered back to their own dedicated section in the existing DCC SharePoint site.

TOC Development and testing will not follow the PIT, SIT, and UIT pattern associated with a "conventional" SEC Release, and will not require the testing services of the System Integrator or CSPs. Once the Modification is approved, the DCC will compile the report and work with a MAP or Manufacturer as appropriate to validate the results and ensure the output meets the requirements. Once the output is approved, DCC will begin delivery of the report.

5 Impact on Systems, Processes and People

As defined the change included in this document is confined to data already within the DCC TOC, with no expected changes impacting SMETS1 or SMETS2 Service Providers.

5.1 DCC Technical Operations Centre Development and Testing

The full range of activities required to implement these requirements including design, development, testing, and implementation would be performed by DCC in-house contractors and permanent staff. These activities include:

- Deliver Data Model algorithms, build report, test, document, update database, update interfaces and document solution.

The DCC TOC costs for the solution include requirements which only require existing data held in the TOC. No Service Provider contract changes are required.

5.2 Technical Specifications

No change to DUIS, GBCS, or any other Technical Specification is expected.

5.3 Self Service Interface

No Impact has been noted.

5.4 Infrastructure Impact

To meet the requirements in this Modification, no additional infrastructure (database, systems, cloud capability or capacity) is envisaged. Any additional data-marts, data-tables and data warehouse solution costs will be facilitated by economies of scale, and will be absorbed into TOC running costs.

It should be noted that the solution as proposed should not add noticeable traffic or processing to the Smart Metering System or network.

5.5 Application Support

There will be a slight increase in the Full Time Employees (FTEs) required to support, maintain, and deliver the reporting on a monthly basis, but this will be absorbed into the BaU function. It should be noted that these additional, small incremental increases in workload will eventually lead to headcount increases. These services will include:

DCC TOC Reporting Staff	Required to support and maintain the TOC system as Business as Usual, building DCC data throughout month and packaging report in 10 day production cycle
DCC TOC Third Line Support	For Reports requirements: Support and query answering, plus maintenance and optimisation
Operations Support	Covers both Service and Incident Management and is centred on the requirement to provide Commentary. Investigation will be required to identify whether the performance deterioration is as a result of issues with system, Comms Hubs, Meters, Orchestration or areas entirely outside DCC visibility (actions taken by SEC Parties e.g. Staff being taken off work due to training, system issues with customers etc.

5.6 DCC Service Impact

Impacts to DCC Service Design, Service Management and other Application Support functions are likely, and it is expected that further TOC staffing will be required to support the changes in this Modification. These costs will be determined as part of the Full Impact Assessment, and will reflect the complexity and other properties of the solution.

6 Implementation Timescales and Approach

A key factor in planning and delivering this Modification's implementation and release is that the changes are neither part of the Smart Metering System, nor do they impact any Technical Specifications, such that they can be implemented separate from the now-standard SEC Release dates.

6.1 Testing and Acceptance

It is assumed that the change will be implemented and tested as a separate release, and will include testing iteratively during development. The development and testing will not require the testing services of the System Integrator or CSP.

It is likely that selected Service Users would be engaged in the design, development, and test phases for this Modification. A full analysis of the testing methodology will be defined as part of the FIA.

7 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal. The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as assumed above. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a FIA and as such there may be elements missing from the solution or the solution may be subject to a material change. As a result the final price may result in a variation.

7.1 Design, Build, and Testing Cost Impact

The table below details the cost of delivering the changes and Services required to implement this Modification. The scope of supply under this PIA includes design, development (build), testing within a selected TOC environment. Activities out of scope of this cost include Application Support and infrastructure improvements.

£	Design, Build and Test
MAP Access to TOC Data	£45,000-65,000

Based on the existing requirements, the fixed price cost for a Full impact Assessment is £20,000 and would be expected to be completed in 30 days.

7.2 Application Support Costs

Although not included in this Modification PIA, DCC TOC believe the Application Support for this change can be added into ongoing reporting work at no additional cost. There may be small charges for other DCC support activities.

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
BAU, BaU	Business As Usual
CPL	Central Products List
CSP	Communication Service Provider
CSV	Comma Separated Variable
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
FIA	Full Impact Assessment
FTE	Full Time Employees
GBCS	Great Britain Companion Specification
GUID	Global Unique Identifier
MAP	Meter Asset Provider
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SFTP	Secure File Transfer Protocol
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specification
SRV	Service Request Variant
TOC	Technical Operations Centre
UIT	User Integration Testing

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MP181 ‘Meter Asset Provider access to asset related data held by the DCC’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP181 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Receiving the data proposed will allow us as a MAP to more successfully manage the portfolio of meters we own.	-
Electricity North West Limited	Network Party	Yes	Whilst as a Network Party we aren't directly impacted we are supportive of proposal that will help ensure Device firmware is kept up to date.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	The DCC is the only central point that can efficiently provide this data to MAPs to monitor our assets.	-
Calvin Capital Limited	Other SEC Party	Yes	This will provide MAPs and manufacturers means to validate information on devices and the firmware versions, which are operating in the DCC. This will provide accurate information to MAPs to track the health of our assets and confirm firmware information	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	This modification will allow Northern Powergrid Metering Limited (NPML) to monitor the asset health of NPML owned assets.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we own.	-

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we own.	-
BUUK	Network Party	Yes	Access to source data for the proposed data items will facilitate more effective asset management, provided that the explicit charges agreed for the report are proportionate & not prohibitive.	-
British Gas	Large Supplier	Yes	It seems sensible to allow MAPs and Manufacturers access to this data, for just their own assets. <u>MAPs</u> This modification solution will allow MAPs direct access to the information listed on their assets, rather than going through the Energy Supplier. This is information they already have access to, but this access will be quicker and more direct, and is potentially more accurate/up to date. From a privacy viewpoint: allowing MAPs access to the data on their meters directly will not tell them anything they don't already know on a customer level. MAPs already have the GUIDs mapped across to MPXN numbers. However, it will allow them to check their existing data for errors, particularly by confirming the Supplier ID.	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			The MAPs will have a Supplier ID on their database. Originally this will be the installing Supplier. However, once customers churn, if the right data flows haven't been sent to the MAP, the Supplier ID on their records may not be accurate. Direct access to DCC data will allow the MAPs to validate the Supplier name on their system, and make sure they are contacting and billing the correct supplier. <u>Manufacturers</u> Allowing Manufacturers access to the data on their meters directly will help ensure consistency on firmware updates, etc. It will not give them any further customer level information, as the meters will still just be identified by their GUID.	
SGN Smart	Other SEC Party	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we have invested in and own.	-
ScottishPower Energy Retail	Large Supplier	Yes	MAPs require a limited cut of data from the DCC inventory to cover the MAP asset base in order to aid management of their estate. The data cut is proposed to be delivered by the DCC TOC team as an estate report.	-
Landis+Gyr	Other SEC Party	Yes	The availability of this data in this way is logical and provides manufacturers and MAPs with the data.	-
E.ON	Large Supplier	Yes	We believe it fulfils the issue identified.	-

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Question 2: Do you agree that the legal text will deliver MP181?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, the legal text proposed is sufficient to deliver MP181.	-
Electricity North West Limited	Network Party	Yes	See our response to Q1.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	It is correctly drafted.	-
Calvin Capital Limited	Other SEC Party	Yes	The text covers the requirements.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The legal text provided will deliver this modification.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	The legal text will deliver MP181.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	The legal text will deliver MP181.	-
BUUK	Network Party	Yes	N/A.	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	We agree that the legal text will deliver MP181, but have two comments to make: <u>Wording clarity (around definition of 'report')</u> It is a bit unclear in the legal text whether a “report” is a single line of data on one Meter, or a full list of data for all Meters relevant to that MAP or Manufacturer. Could I suggest that H17.5 is amended to say that “Each report under this Section H17 will set out for each Smart Meter (for which the receiving party is the Manufacturer or Meter Asset Provider):” The legal text needs to be really clear that there will be an individually tailored report sent each time (to each MAP or Manufacturer), depending on which Smart Meters it includes. <u>Need for additional T&Cs</u> There are no obligations in the legal text on the Meter Asset Provider or Manufacturer as to what restrictions exist as to what they do with the data they receive. This doesn't feel right – although the more appropriate place for this might be in the new T&Cs, rather than in the SEC text.	SECAS will raise your comments with the Proposer and SEC Lawyers and make amendments accordingly.
SGN Smart	Other SEC Party	Yes	The legal text has been supported by MAPs and will deliver MP181.	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	-
Landis+Gyr	Other SEC Party	Yes	No comment.	-
E.ON	Large Supplier	Yes	No comment.	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes I believe the proposed implementation approach and timescales are adequate.	-
Electricity North West Limited	Network Party	Yes	See our response to Q1.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Finally!	-
Calvin Capital Limited	Other SEC Party	Yes	We are keen to have reports available as soon as possible so are supportive of the approach.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The implementation of this modification should be delivered as soon as possible.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	-

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	Yes	As access to the data sets would improve ongoing operations, we support a 03 November 2022 implementation.	-
British Gas	Large Supplier	Yes	Seems sensible. In general, we are happy with the proposed implementation approach. The MAP validation process of sending in a list of GUIDs doesn't seem very scientific or robust. However, if SECAS (or DCC) have the right level of checks in place we can't see it being a material risk. We assume that there will be T&Cs for this new service for MAPs and Manufacturers, and these will include data protection, confidentiality etc, plus some general restrictions on what the information can / can't be used for. (For example, it can't be sold on to third parties, etc.)	-
SGN Smart	Other SEC Party	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	-
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	-
Landis+Gyr	Other SEC Party	Yes	No comment.	-

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
E.ON	Large Supplier	No	E.ON's Supplier and MAP functions will support the proposed implementation when there is clarity around the confidentiality controls that will be introduced with this approach. Aside from evidencing that the MAP is the asset owner, the solution proposed doesn't appear to introduce any confidentiality arrangements to prevent third parties from inappropriately using the considerable amount of detailed data that would be provided by the DCC.	SECAS will inform the Proposer and the Working Group of your comments which may lead to amendments to the legal text.

Question 4: Will there be any impact on your organisation to implement MP181?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Only a minor impact expected in generating and delivering the requested GUID reporting to the DCC via methods to be determined. The benefit far outweighs any effort involved.	-
Electricity North West Limited	Network Party	No	See our response to Q1.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Minor administrative activity to be able to access reports but this was always expected and it is ultimately to our benefit.	-
Calvin Capital Limited	Other SEC Party	No	No impact.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	This will require minimal effort to implement and we will see an almost immediate positive impact on the business as it will improve visibility on all NPML owned assets.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	This is minor effort for us and the benefit of the modification far outweighs the time allocated to implementing this modification.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	This is minor effort for us and the benefit of the modification far outweighs the time allocated to	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			implementing this modification. Horizon already has a similar process in place with Xoserve.	
BUUK	Network Party	No	N/A.	-
British Gas	Large Supplier	No	We already have obligations in our MAP contracts to supply certain information. This will simply be allowing MAPs to access that data directly from DCC, should they prefer. Individual MAPs will now have two routes to the same information.	-
SGN Smart	Other SEC Party	No detrimental impact	This is minor effort for us and the benefit of the modification far outweighs the time allocated to implementing this modification.	-
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	-
Landis+Gyr	Other SEC Party	Yes	Clearly MAPs and manufacturers will bear a cost which is unknown at this point.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	Yes	We would have to set up processes to request the reports and generate the information required.	-

Question 5: Will your organisation incur any costs in implementing MP181?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	No costs	Little to no costs expected.	-
Electricity North West Limited	Network Party	No costs	See our response to Q1.	-
Smart Meter Assets 1 Limited	Other SEC Party	No costs	Any costs will be negligible and absorbed within our business with possible benefits to outweigh the costs.	-
Calvin Capital Limited	Other SEC Party	Less than £100k	Limited costs associated with setting up a process around reporting. Plus the minimal amount for this service, but the benefit of us having this information far outweighs the charge.	-
Northern Powergrid Metering Limited	Other SEC Party	No costs	This modification requires minimal costs for NPML to set up.	-
ScottishPower Smart Metering Assets Ltd	N/A	No costs	Costs will be minimal.	-
Horizon Energy Infrastructure Limited	Other SEC Party	No costs	Costs will be minimal.	-

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	No costs	We would again request that explicit charges for the report are proportionate & not prohibitive appreciating the positive impact that access to this data would have on the end consumer through more effective asset management.	-
British Gas	Large Supplier	No costs	We do not expect to incur any costs.	-
SGN Smart	Other SEC Party	No costs	Costs will be minimal.	-
ScottishPower Energy Retail	Large Supplier	No costs	No comment.	-
Landis+Gyr	Other SEC Party	Less than £100k	This question seems aimed at the DCC not manufacturers or MAPs but there is a cost to us which is as yet unknown.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	No costs	Minor set up costs, expected to be minimal if any.	-

Question 6: How long from the point of approval would your organisation need to implement MP181?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	This can be implemented as soon as MP181 is approved	Minimal work required to generate the required reporting.	-
Electricity North West Limited	Network Party	N/A	N/A.	-
Smart Meter Assets 1 Limited	Other SEC Party	Almost immediately	Minimal activity that can be planned in advance.	-
Calvin Capital Limited	Other SEC Party	Less than a month	Minimal time impact, we have the information available to be provided to DCC for their validation.	-
Northern Powergrid Metering Limited	Other SEC Party	Immediately, this will take around three weeks for NPML to start seeing the benefits	NPML already have processes in place to capture the data from this modification.	-

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
		of this modification		
ScottishPower Smart Metering Assets Ltd	N/A	We can implement this modification immediately. A few weeks at most	No internal system changes required.	-
Horizon Energy Infrastructure Limited	Other SEC Party	We can implement this modification immediately. A few weeks at most	This is a similar process to the one we run with Xoserve.	-
BUUK	Network Party	N/A	N/A.	-
British Gas	Large Supplier	No time required (Large Supplier)	No time required.	-
SGN Smart	Other SEC Party	We would be able to implement	This is a similar process to the one we run with Xoserve.	-

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Question 6				
Respondent	Category	Response	Rationale	SECAS Response
		this modification almost immediately.		
ScottishPower Energy Retail	Large Supplier	N/A	No comment.	-
Landis+Gyr	Other SEC Party	N/A	No comment.	-
E.ON	Large Supplier	3 months	No comment.	-

Question 7: Do you believe that MP181 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, we believe MP181 would aid and facilitate the General SEC objectives by allowing us to ensure our portfolio is running on the optimum firmware combinations and that meters are installed in a DCC active state. It will also allow us to quickly and accurately identify any detrimental trends to ensure the SMIP is operating as planned.	-
Electricity North West Limited	Network Party	Yes	We agree it will better facilitate SEC Objective (a) the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	-
Calvin Capital Limited	Other SEC Party	Yes	Access to device and firmware data will enable us to support the facilitation and maintenance of healthy devices, those operating in smart mode and with appropriate firmware.	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Northern Powergrid Metering Limited	Other SEC Party	Yes	This will better facilitate SEC Objective A and C, allowing us to better provide suppliers with information regarding optimal firmware and device model combinations on NPML meters.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	-
BUUK	Network Party	Yes	We agree with the proposer that MP181 better facilitates General SEC Objectives: (a)2: Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain. (c)3: Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.	-
British Gas	Large Supplier	Yes	We agree that this better facilitates General SEC Objectives A and C.	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
SGN Smart	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	-
ScottishPower Energy Retail	Large Supplier	Yes	The MOD will facilitate SEC Objective (a) by affording MAPs the opportunity to better manage their asset bases.	-
Landis+Gyr	Other SEC Party	Yes	This data does enable manufacturers and MAPs to assist suppliers in their management of assets in the field and to provide information for reporting to relevant authorities (eg SSC).	-
E.ON	Large Supplier	Yes	We believe the modification supports the SEC objectives in line with the proposer (a and c).	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP181 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Trend analysis as discussed in question 7 and a better understanding of smart meters installed will allow asset owners to ensure they're working as expected and on the most appropriate firmware combination. Ultimately, this leads to a more robust and reliable user experience for consumers.	-
Electricity North West Limited	Network Party	N/A	No comment.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Lower costs (through efficiency of solution) will reduce industry costs which are, ultimately, borne by consumers.	-
Calvin Capital Limited	Other SEC Party	Yes	We will be able to support suppliers in providing devices which operate as smart, are accurate in reporting consumption, have appropriate security controls in place (through firmware) and therefore provide the optimum benefits to consumers.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	Better firmware management for smart meters will lead to more Device issues being resolved and a better user experience for energy consumers.	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Access to data will help MAPs understand how their Estates are performing. In the long term, this will assist in understanding long term costs and will ultimately maximise the life of the asset on the wall. Installation of smart meters will also allow consumers to better manage their energy usage.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Installation of smart meters will also allow consumers to better manage their energy usage.	-
BUUK	Network Party	Yes	Consumers will be positively impacted through more effective asset management. For example device firmware update data will ensure that devices are updated & fit for purpose.	-
British Gas	Large Supplier	No	No direct impact, but overall this modification should help to improve the processes for making sure everyone's meter is up to date with the latest firmware, particularly for assets which have churned.	-
SGN Smart	Other SEC Party	Yes – positive benefits	No comment.	-
ScottishPower Energy Retail	Large Supplier	Yes	If implemented, MP181 will afford MAPs the opportunity to better manage their metering assets, thereby extending	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			lifetimes and delivering a better consumer experience of Smart Metering.	
Landis+Gyr	Other SEC Party	No	No comment.	-
E.ON	Large Supplier	Minimal	More information shared with relevant stakeholders within the industry will ultimately benefit all, but end consumers of smart are not likely to benefit directly from the sharing of data. Associated or resulting activities will indirectly benefit energy consumers.	-

Question 9: Noting the costs and benefits of this modification, do you believe MP181 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, this modification should be approved.	-
Electricity North West Limited	Network Party	Yes	See our response to Q1 and Q7.	-
Smart Meter Assets 1 Limited	Other SEC Party	Yes	The business case is sound with users of the service happy to pay for it.	-
Calvin Capital Limited	Other SEC Party	Yes	We are supporting of this change and associated costs.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	This is a modification to allow the DCC to provide a service NPML as a MAP intend to pay for.	-
ScottishPower Smart Metering Assets Ltd	N/A	Yes	As a MAP we expect to be charged for this service.	-
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	As a MAP we expect to be charged for this service.	-

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	Yes	N/A.	-
British Gas	Large Supplier	Yes	We agree it should be approved.	-
SGN Smart	Other SEC Party	Yes	As a MAP we expect and accept that there will be charges to use the service.	-
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	-
Landis+Gyr	Other SEC Party	Yes	It is hard to answer this as we have no idea of the DCC pricing structure but allowing DCC to develop this is a step forward.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	Yes	Subject to the issue highlighted in Question 3 around confidentiality we believe there is a benefit to this modification. However, final decision should be based on what the Explicit Charge is from the DCC, as that has not yet been outlined in the modification report.	-

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	MP181 will benefit the whole SMIP, ensuring MAPs have access to data for assets they own, meaning there is more momentum behind correcting troublesome sites.	-
Electricity North West Limited	Network Party	No comment.	-
Smart Meter Assets 1 Limited	Other SEC Party	No comment.	-
Calvin Capital Limited	Other SEC Party	This modification will allow MAPs and manufacturers access to key data which will support our work with suppliers around maximising smart meter health and firmware upgrade processes.	-
Northern Powergrid Metering Limited	Other SEC Party	No comment.	-
ScottishPower Smart Metering Assets Ltd	N/A	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	-
Horizon Energy Infrastructure Limited	Other SEC Party	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	-
BUUK	Network Party	No comment.	-

Question 10			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	Can the title of this modification be changed to include MAPs and Meter Manufacturers?	SECAS will notify the Proposer of your comments.
SGN Smart	Other SEC Party	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	-
ScottishPower Energy Retail	Large Supplier	No comment.	-
Landis+Gyr	Other SEC Party	In the impact section it talks about installers who have no interest. I assume this means MAPs.	The Modification Report has been amended following your comments.
E.ON	Large Supplier	This modification will provide MAPs with additional data on our assets, that will support industry understanding and progressing other activities. In many cases these other activities will benefit multiple parties, and indirectly energy consumers.	-
Utilita	Large Supplier	We do not approve of the cost recovery aspect of MP181. It is possible MAPs / Manufacturers may not utilise the solution delivered by MP181. If this situation materialised, it is unclear how any initial incurred cost would be recovered from industry; we note DCC intend to begin development immediately following implementation and recover incurred cost through Explicit Charging. However, there is no guarantee that costs could be fully recovered via this route if the solution was never used. It should not be the case paying Parties fund a modification which delivers very limited benefit to those Parties, whilst simultaneously exposing them to the possibility of unrecovered costs.	(Please note that Utilita provided comments outside of the Refinement Consultation response form). SECAS will notify the Proposer of your comments and address them at the Working Group.

Question 10			
Respondent	Category	Comments	SECAS Response
		RE: SEC Objectives, we note proposers' comments regarding SEC Objective A & C and provision of rollout of optimum firmware combinations. We do not believe MP181 facilitates any of the SEC Objectives. Suppliers actively monitor meter firmware and manage their metering estate to ensure it is as required by the Supplier. We therefore see no new or obvious additional benefit being delivered through implementation of MP181.	