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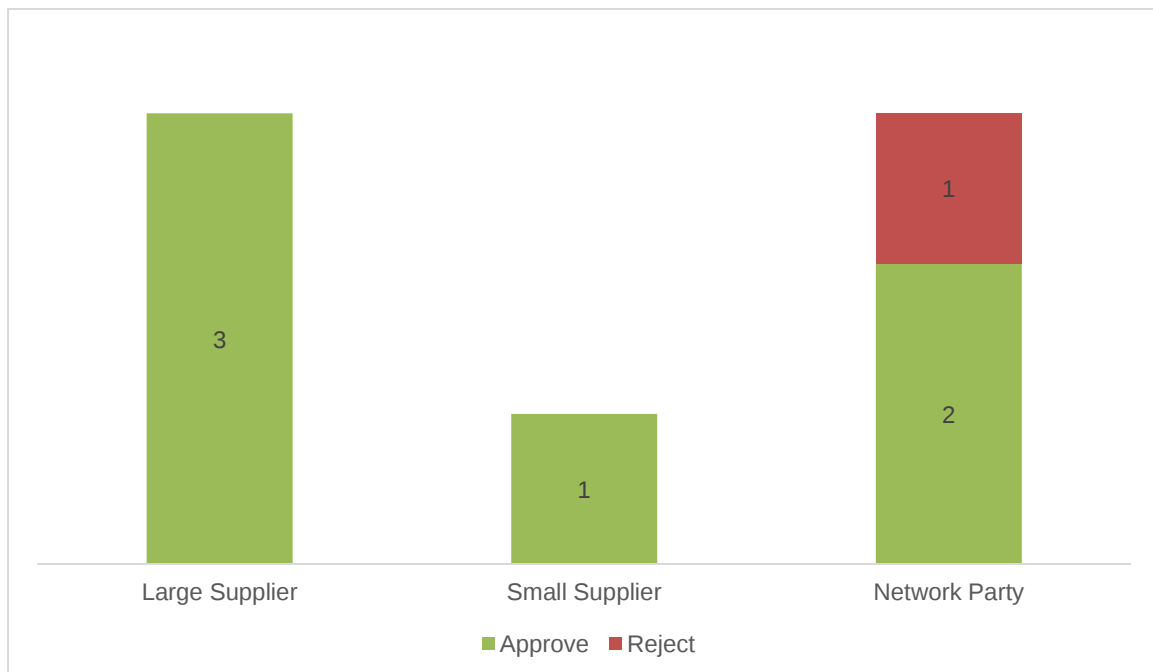
SECMP0028 ‘Prioritising System Messages’

Modification Report Consultation responses

About this document

This document contains the full non-confidential collated responses received to the SECMP0028 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that SECMP0028 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Approve	<u>General comments</u> We are cautiously supportive. We agree with the benefits of introducing prioritisation. However, we do have some concerns. We don't think the current Priority Levels list is fully correct (see below for more details). It isn't clear how quickly an individual message's priority could be resolved if there were problems. It is useful that the change is structured so a change of priority wouldn't need a full SEC modification, however, it isn't clear how quickly changes could be made to the 'Traffic Management Mechanism' document which would contain the individual priorities. It isn't clear what happens after an outage. We are concerned about the risk of unintended consequences, such as has happened with some recent incidents following the introduction of northbound prioritisation. <u>Specific comments on the Priority Levels</u> We believe that there needs to be more refinement of the Priority Levels list. While the Modification to introduce the prioritisation could be approved by Change Board this month (December 2023), there seems to be further work needed on the Priority Levels, and the potential system	If the Data Service Provider (DSP) has an outage, all queued messages would expire and need to be re-sent. This is not impacted by this modification. If the outage was to occur between the DSP to the CSP or S1SP, this is outside of the scope of SECMP0028. However, the DCC will confirm how this works and provide an update. Following industry feedback, SECAS will be presenting the solution to Change Board with intent of gaining approval for the Southbound Prioritisation Mechanism alone.

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			impacts, which we understand the Change Team are looking at. Our initial concerns include the following: • <i>2.5 Activate Emergency Credit</i> is currently proposed as a Priority Level 3, but for various suppliers, this may be the Service Request that re-establishes supply, so should be a higher Priority Level. Utilita has a process for auto-top-up, but this isn't used across all suppliers. • <i>4.18 Read Meter Balance</i> may be helpful if a consumer is off supply and calls in to the supplier's call centre. This is currently just a Priority Level 3, but potentially should be higher. • <i>11.3 Activate Firmware</i> is currently Priority Level 3, but that is potentially high especially when compared with some of the Service Requests in lower Priority Levels. There should also be a review of how the Priority Levels compare between northbound and southbound. Eg if the response to a high priority SR is low priority, then this could defeat what is being achieved. Can the Change Team explicitly share the plan and timeline for how the draft Priority Levels will be assessed and finalised over the coming months?	The priority levels assigned to each Service Request will be developed and agreed by the TABASC no later than May 2024 (6 months before implementation in the November 2024 SEC Release). The TABASC will also review the Northbound and Southbound priorities as part of this work.

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National Grid Electricity Distribution	Network Operator	Approve	We agree that this further facilitates SEC Objective A & C	-
Scottish and Southern Electricity Networks	Network Operator	Approve	As long as SR 7.4 is priority 1 as this is relating to the continuity of a consumer's energy supply and is prioritised, for example during storm scenarios when Network parties would need to be communicating with meters to be able to confirm supply is on or off, then we believe that SECMP0028 should be approved. We do not know how long the delay scenarios may be as we also use SR 4.10 in a similar manner and as such would prefer to have this SR added higher up on the priority list.	SECAS notes the feedback provided and will ensure this is considered by the TABASC when finalising the priority levels for each Service Request.
E (Gas and Electricity) Ltd	Small Supplier	We believe that SECMP0028 should be approved.	SECMP0028 supports the first General SEC Objective by facilitating the efficient operation of Smart Metering Systems at Energy Consumers' premises within Great Britain by prioritising Service Requests impacting the continuity of consumers' energy supply.	-
Utilita Energy Ltd	Large Supplier	Approve	The prioritisation mechanism implemented by this modification gives Industry a critical tool in protecting customers and ensuring continuity of supply, especially for prepayment customers (who are more likely to be vulnerable). It is unacceptable that critical requests dealing with key functions such as prepay top ups or supply enablement are unnecessarily subject to the limitations of system resource. Unpredictable surges in	-

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			traffic, limited system resources and unknown impacts on messages can all leave these key requests languishing in traffic queues, waiting for their turn to be sent through the system to the customer's meter. This modification gives us the tools to mitigate these circumstances by prioritising key service requests so that they can make it through the system regardless of any factors that may affect system traffic or congestion. We believe that this modification positively influences SEC Objective (a), as it provides the tools to ensure that installation and commission service requests, as well as those related to prepay operation, can flow through the system even in times of high traffic or congestion.	
Electricity North West Ltd	Network Operator	Reject	The priority is reasonable. However, we remain concerned with the mechanism itself: "Messages will be processed in order of their priority Level, regardless of the order in which they are received. " This effectively means that lower priority messages will only ever get serviced when there is no queue of any higher priority messages. If higher priority message continue to arrive in volume then the lower priority messages could be delayed indefinitely.	The alternative solution option referenced was presented to various Sub-Committees and forums throughout the lifespan of this modification. The overall feedback was that it would be too complex and therefore it was recommended SECAS proceed with the Proposed Solution.

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			A more balanced approach needs to be applied such that a % of processing capacity is always available for each priority (e.g. For every 60 P1 requests ensure that 20 P2, 12 P3, 6 P4, 2 P5 be processed at the same time). This approach would ensure that the whole queue keeps moving albeit at different speeds.	
EDF Energy	Large Supplier	Approve	With unprecedented demands on the DCC system coming from a variety of sources, it makes sense to have a priority list for SRs should it be required to ensure vulnerable customers, PAYG meters and time sensitive requests can be protected from less important SRs creating delays in processing of requests. Potential issues with this mod could occur however, if on-demand SRs receive priority over scheduled requests; this could penalise users attempting to manage traffic with DCC in favour of suppliers making ad hoc requests with no regard for other users of the system. The proposer of the mod has indicated that its purpose is primarily to create a mechanism for prioritisation in the event of high traffic and that the specifics of which SRs gets prioritised could be changed if issues should arise. In theory if the mod was problematic all SRs could be set to the same priority, thus effectively nullifying it, whilst keeping the mechanism in place should it then be needed in future.	-

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			As such, it appears to be worth creating a prioritisation mechanism in line with the SEC objectives to improve the service in the event of high demand on the system, to protect PAYG customers et al, with the assurance that if issues were to arise from the specific prioritisation set, that these could be amended as necessary (or nullified as above).	

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	<u>Typo</u> There is a typo on page 6 on the Mod Report, which says Priority 2-5 messages will only be promoted to Priority 1 if there is capacity AND they are close to breaching TRT. However, this should be “AND/OR”, as in the text on page 2 of this consultation response document. Please can this be changed in the Mod Report as it is quite important that it is correct. <u>SSC Input, and inclusion in the Mod Report</u> I believe there has been SSC input into this mod’s development, however it isn’t mentioned in the Mod Report. We had previously flagged a concern over a possible Denial of Service risk, giving misuse of the 2.2 data flow as a specific example. I realise there have been changes introduced in the mod (including the above promotion of all messages to Priority 1 if they are getting close to breaching their TRT) which may be sufficient to mitigate this. However, I am bothered that there isn’t a formal “SSC position” paragraph within the Modification Report to confirm they have reviewed this and are happy with the final design. Can you confirm when the SSC last reviewed SECMP0028? Was it within the last 6-9 months? <u>Ongoing TABASC input</u> We understand there is a further conversation taking place in January at TABASC on the Prioritisation Levels.	SECAS acknowledges the wording misalignment between the Modification Report and the Modification Report Consultation documents. The correct instance was “AND”. The capacity must be available before a Service Request can be re-prioritised. SECAS has now included the missing input from the SSC within the Modification Report, available on the webpage as v1.1.

Question 2			
Respondent	Category	Comments	SECAS Response
National Grid Electricity Distribution	Network Operator	N/A	-
Scottish and Southern Electricity Networks	Network Operator	N/A	-
E (Gas and Electricity) Ltd	Small Supplier	In particular, SECMP0028 addresses the following scenarios seen in recent live operation: (a) delayed delivery of SR2.2 (command variant 2 – SMETS1 UTRN request) messages during industry price change events, causing transaction timeout at the PSP. Prepayment Customer is unable to top-up with risk to continuity of supply (potentially high impact but for a defined period only). (b) delayed delivery of SR2.2 (Command Variant 2 – SMETS1 UTRN Request) messages during normal operation due to [undiagnosed] overload condition, causing transaction timeout at PSP. Prepayment Customer is unable to top-up with risk to continuity of supply. At current DCC device numbers, events of type (b) are usually small. However we have seen new patterns (eg as under investigation in PBI000000128806) and overload events like this may increase with increasing device numbers in DCC. Worst case – all Service Requests are delayed Southbound – all SMETS1 Prepayment customers unable	-

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		to top-up for an extended period – large number of customers off supply. SECMP0028 provides significant mitigation for this scenario.	
Utilita Energy Ltd	Large Supplier	It is important to note that this modification focuses on implementing a mechanism to allow the prioritisation of service requests, and that the proposed priority levels can be changed in a much more rapid fashion than being forced to go through the modification process. The list as proposed is not final and will be discussed at Working Group, Ops Group and TABASC in the coming months for approval of Parties attending those groups, but it is important that the mechanism that enables those priorities be approved and implemented as swiftly as possible to ensure our customers are protected to the best of our abilities. Approval of this modification is recognising that continuity of supply must be protected. All lower order concerns, such as the specific categorisation of lower order SRs, are insufficient to prevent us from introducing measures to protect customers. As the system becomes ever more congested, it is crucial that key customer protections are in place. This way, we can ensure that the system is always capable of meeting the minimum service levels required to keep customers on supply, and future programmes can be implemented without heightened risk to continuity of supply. With sporadic issues already occurring, and significant known traffic issues on the horizon, we must implement prioritisation now. Beyond MHHS, we are particularly concerned about the impact of the 3G switch off and the increased load on the 2G network. With recognised issues and risk	-

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		on the horizon, implementing this proposal significantly de-risks all these other impending issues.	
Electricity North West Ltd	Network Operator	N/A	-
EDF Energy	Large Supplier	N/A	-