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MP219 ‘Accessing Consumption Data on behalf of SEC Parties’

Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

SECAS received 11 responses to the Modification Report Consultation. Seven respondents believed the modification should be approved. They considered the modification better facilitated SEC Objectives (c)¹ and (f)².

Eight respondents believed the proposed changes to the Privacy Controls Framework should be approved, with three respondents against.

¹ facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

² ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Modification Report Consultation responses

Summary of responses

Supportive Parties (Other SEC Parties and Small Supplier) noted that this modification would provide a smoother customer experience Energy Consumers to participate in National Grid's Demand Flexibility Service (DFS). This would remove the reliance on customers having to consent through various consent models, such as through their In-Home Display (IHD).

One respondent (Network Party) noted that they believed this modification could increase traffic across the DCC network as the employing Party could continue to request the same Consumption Data which the contracted Other User is also collecting. The respondent noted the figures used in the Modification Report about a 1% increase in traffic across the DCC System may not be accurate as the employing party may continue to collect Consumption Data while the contracted Other User is collecting it on their behalf.

One respondent (Large Supplier) rejected the modification as the changes to the Privacy Controls Framework, in particular the right of the consumer to opt out of an Other User collecting their data, would have made using an Other User impractical.

Another respondent (Large Supplier) rejected the modification as they considered that allowing Other Users to collect data without Unambiguous Consent could negatively impact the reputation of the Smart Metering Implementation Programme.

One respondent (Large Supplier) rejected the modification but noted they would change their response dependent on whether Citizens Advice supported the changes being made as part of this modification. SECAS engaged with Citizens Advice who confirmed they are supportive of the controls and changes being introduced as part of MP219.