Modification Report Consultation Responses: SECMP0011 ‘Including the MAP ID in the Smart Metering Inventory’

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public and any members may publish the information, subject to copyright.

This document contains the detailed responses for the SECMP0011 Modification Report Consultation.

A summary of the responses is contained within section 7 of the SECMP0011 Final Modification Report.

If you would like any further information, or if you have any questions, please do not hesitate to contact **Samuel Browne** on **020 7090 7755** or at **secas@gemserv.com**.

Contents

1. Views of Large Suppliers

Summary of **Large Supplier** views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	2 Parties
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	
c) To 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.	
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	
e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	1 Party
g) To facilitate the efficient and transparent administration and implementation of this Code.	
(h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.	

Large Supplier Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
Utilita	Abstain	Although we understand the need for MAPs to better track their utilised assets, we remain unconvinced that the DCC is the right place for holding this information when work is being conducted elsewhere to introduce a central repository of this information, as a result (at the time of assessing this Modification) we have abstained from making a decision. Ofgem have made clear their intention for MAP ID to be introduced into the CRS under the switching programme. Although there is currently no certainty of which Reform Package will be progressed, we view this Modification to have a limited life expectancy and would duplicate future functionality at significant costs to industry parties where a new CRS was introduced. We are aware that the DCC provided cost savings with parallel development of Modification solution, however these cost savings are dependent on the progression of other Modifications. We are therefore yet to be convinced that the solution benefits documented within the Modification form outweigh the significant costs being provided by the DCC.
EON	Reject	We do not agree with the modification proposal that this change would improve the baseline of the SEC. We are concerned that by inclusion of the MAP ID, creates a duplication of data within the industry that is inefficient and that the costs of doing so are not outweighted by the benefit.
EDF Energy	Reject	"We do not believe that a robust case has been made that this Modification better facilitates the SEC objectives or is an improvement over the current industry baseline for communication of MAP information. Accurate identification of the MAP for a smart meter should be possible under the current industry metering arrangements. As has noted been noted in the Modification Report this Modification is being raised to address deficiencies in the current industry processes, and specifically the communication of MAP information for gas meters. We believe that it would probably be more cost effective to address the deficiencies in the current processes than to make

Large Supplier Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
		this change. This would also resolve the issue for all meters, and not just smart meters enrolled in the DCC (which may or may not include SMETS1 meters in the future). Making this change only for meters enrolled in the DCC creates two separate processes. We would also note that better communication of information related to the MAP is a feature of all of the Reform Packages which Ofgem have considered as part of their Switching Programme. Again the mechanisms proposed under the various Reforms Packages detailed in the recent Ofgem RFI are likely to address this issue on a more cost-effective basis, and for all meters and not just those enrolled in the DCC. A key concern for us is the cost of this Modification; were the costs to be reduced we believe that this change would be a viable alternative to the mechanisms detailed above. We would like to challenge the costs that have been provided for this Modification, and specifically the synergies that might be realised through implementing this change in the same release as SECMP0004 (which we believe has a much stronger cost/benefit justification). The Modification Reports for these changes show that the only synergies that would be gained from implementing these changes together would be in Testing and Implementation to Live. This does not seem to be correct. These two changes are essentially the same; they are each adding a data item to the DCC Inventory and a number of associated SRs (and other functions such as reporting). our expectation is that the cost increase of adding two data items rather than one would be incremental – we would definitely would not expect the design costs to remain unchanged if the two Modifications were implemented as part of single release as you would effectively have a single design covering both Modifications. Our expectation is that our own costs to implement both of these Modifications in a single release would be a 10% increase in our costs from implementing one of the changes, and we would expect the DCC costs to be in the same region. Instead this is showing that implementing both changes would only reduce the overall cost by less than 10%. We really don't understand how

Large Supplier Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
		this can be the case. The cost information is obviously critical when considering these changes as in both cases the challenge that has been made is whether the benefits of making the changes outweigh the costs, even if people feel that the SEC objectives are better facilitated by the changes. This bar becomes a lot harder to reach when the costs we are being provided are not only very high, but do not seem to be realistic. While we recognise that each Modification needs to stand on its own, the actual overall cost of implementing these changes as a release will be a consideration for Parties when deciding whether to approve or reject these changes – our concern is that these changes might be rejected, either by the Change Board or by BEIS in the role of the Authority, on the basis of inaccurate information. Our view of the viability of this Modification would be likely to change if the incremental costs of delivering this change in addition to SECMP0004 were more reasonable.
British Gas	Reject	We do not believe this modification supports any general SEC objectives, the implementation of this change at the proposed costs to the Industry would contradict general SEC objective (b).
First Utility Limited	Reject	We somewhat reluctantly reject this modification; the benefits are welcomed but unfortunately the costs are disproportionate and we believe to be excessive and unjustifiable, the benefits do not out-weigh the costs, so we reject.
ScottishPower Energy Retail Ltd.	Approve	We agree that better tracking of assets will assist with their continued smart operation, post CoS (i.e. interoperability). Therefore, the proposal better facilitates SEC General Objective (a). We also agree with the proposer that SECMP0011 would help to mitigate the increased materiality of the risk facing MAPs from investing in smart devices. Assuming this will manifest in lower premiums, the resulting benefit to suppliers will better facilitate General SEC Objective (d).

Large Supplier Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
		We recognise that other, possibly less expensive, options might be available. However, while the issue is pressing, the availability of other such solutions remains uncertain.

2. Views of Small Suppliers

No Small Suppliers responded to the Modification Report Consultation.

Administered by Gemserv
8 Fenchurch Place, London EC3M 4AJ

3. Views of Networks

Summary of **Networks** views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	
c) To 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.	
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	
e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	
g) To facilitate the efficient and transparent administration and implementation of this Code.	
(h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.	

Networks Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
SSEN	Reject	With the information provided in the change report we are not able to determine if this modification meets the SEC objectives. In particular we are concerned by the quoted DCC cost for providing this change. We are extremely concerned by the scales of costs attributed to this change by the DCC. There is insufficient detail in the costing information provided in the change report to reasonably explain the scale of costs that are required to deliver this modest enhancement to existing system functionality. We would therefore like to see an independent assessment into the scale of DCC charges associated with this proposed change. We therefore feel that it would be appropriate for the SEC Change Board to escalate this isuue to the SEC Panel for referral to the Authority.
Electricity North West	Reject	"Although as an Electricity Network Operator we have no interest in this modification proposal, on the basis of implementation costs, which we believe are inappropriately large for the change required, we are voting to reject this proposal.
Western Power Distribution	No Interest	We believe that the costs associated with implementation outweigh the benefits of the change. In line with our response to SECMP0004, we are of the opinion that this is not a complex change. At the simplest level this is introducing a new data item into the DCC inventory (which the DCC will neither own nor need to validate), and whilst we appreciate that the change affects a number of interfaces for the DCC, it does not introduce complexity or new business rules and it does not impact the framework of any existing DCC services.

4. Views of Other SEC Parties

Summary of **Other SEC Parties** views against the SEC Objectives	
General SEC Objective	Proposed
a) To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	
b) To enable the DCC to comply at all times with the General Objectives of the DCC and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	
c) To 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.	
d) To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.	10 Parties
e) To facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	
f) To ensure the protection of Data and the security of Data and Systems in the operation of this Code	
g) To facilitate the efficient and transparent administration and implementation of this Code.	
(h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.	

Other SEC Parties Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
TMA	Yes	
National Grid Distribution	Yes	National Grid Smart Ltd (NGS) are supportive of this mod proposal and option 3, as it will allow suppliers to properly validate and approve MAP invoices sent, improve billing and payment processes, reduce operating costs as well as asset ownership disputes. The approach also supports the SEC fourth key objective that it facilitates effective competition for businesses and individuals engaged in the supply of electricity and gas by clearly supporting fair and accurate MAP billing services. MAP's are a major player in the SMIP and are the major financiers behind smart meters. MAP's are always looking to improve metering services, meter asset tracking, accurate MAP billing and more transparent operations. Whilst NGS does support this mod NGS are concerned that the solution, as proposed, does expose commercially sensitive data relating to a MAP's portfolio of smart metering assets and asset strategies; i.e. other parties will be able to deduct meter types the MAP is procuring and potentially (depending on the scope of the reports) have access to volumes. NGS notes that the Mod Working Group have agreed to progress the Mod without any reporting other than the inclusion of MAP ID on SMI which subsequently restricts the access of this data at volume. If this Mod is implemented, all SEC parties, (once a DCC user), will be able to access more asset related data than is currently available under the ECOES system (which has controlled access for recognised industry parties.) NGS advise that the DCC must put in place adequate and robust

Administered by Gemserv
8 Fenchurch Place, London EC3M 4AJ

Other SEC Parties Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
		security and user role access controls to prevent the misuse of information for purposes other than the intended use, as part of the solution design. This mod is also linked to Ofgem's RFI detailing reform packages to enable Faster Switching. In the response to that RFI NGS reinforced some key messages around saving potentially over £1m in the reform package business case by putting the MAP ID requirements in that solution, negating the need for this Mod proposal. NGS highlighted that Reform Package 01 (RP01), without CRS, will deliver the benefits by placing the MAP ID in gas. NGS are expecting a response from Ofgem and are keen to understand the current thinking and direction Ofgem are likely to take, hopefully, before the consultation paper is due in August 2017. A copy of the letter is attached for ease of reference. It is presumed that, given the different milestone dates for the RFI and SECMP0011, Ofgem will ensure there is alignment between both proposals before a decision is made in June 17. There are synergies with SECMP004 and SECMP008; NGS suggest it may be possible to combine these Mods to deliver economies of scale and reduce costs, and that it may be prudent to use the alternative implementation date of 1st November 2017 rather than the 28th June 2017 to allow time for the reform packages consultation due in August 2017 to complete. If the mod is approved in June it will take at least 12 – 18 months to implement based on the feedback from the parties that formed the working group; NGS would look to keep a watching brief until the outcome from

Other SEC Parties Modification Report Consultation Responses - Proposed Modification Solution		
SEC Voting Group Name and represented SEC Parties	Response	
	Approve?	Rationale
		the reform package work is known. However it is recognised that suppliers may just implement it anyway when they see the benefits and value associated with this change.
Chameleon Technology	No Interest	
Brookfield Utilities	Yes	
Calvin Capital	Yes	
Lowri Beck	Yes	
Northern Powergrid	Yes	
SMS	Yes	
Utility Funding	Yes	

A further two Non-SEC Party MAPs responded to the Modification Report consultation under the umbrella of The Community of Meter Asset Providers (CMAP):

- MacQuarie; and
- SGN.

Both MAPs wish to see SECMP0011 implemented.