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SECMP0028 ‘Prioritising System Messages’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the SECMP0028 Refinement Consultation.

Question 1: Do you agree that the proposed priority levels are consistent with those set out in the proposed solution and reflect industry processes?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	The proposed priority levels seem sensible in general. We agree with Priority Levels (1) and (2). We are a bit concerned by Priority Level (3), particularly if this could lead to excessive requests from 'Other User' third party apps (such as Loop or Ivie or similar) blocking the system for Priority Level (3) and Priority Level (4) messages.	Amendments to the Service User Retry Buffer (SURB) have been suggested as part of the DCC's CR4879 which should mitigate the potential for Service Users to flood the system. These would only include a Service User in the list of SUs for SURB data retrieval if the number of messages for that Service User in the Northbound Message Store is below an agreed level.
OVO Energy	Large Supplier	-	Challenges to proposed priority levels in Appendix 1.	SECAS will review the challenges and update priority levels accordingly.
Utilita	Large Supplier	Yes	We agree with the proposed priority levels and agree these are consistent with the solution. As per Working Group and previous consultation rounds, messages associated with Install & Commissioning meet supply continuity criteria and therefore should also be assigned a Priority Level of '1'. Updates to Appendix A should be made to reflect the correct assignment.	SECAS will review the challenges and update priority levels accordingly.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	No	The priority levels are not specific enough. Are Power Outage (AD1) alerts Priority 1 or Priority 3? From a DNO perspective these should be P1 Are Power Restore (x8F35, x8F36 etc) alerts Priority 1 or Priority 3? From a DNO perspective these should be P1 Are SR 7.4 Read Supply Status Service Request Responses Priority 1 or Priority 3? From a DNO perspective these should be P1 It is unclear from the proposal how the specific prioritisation list is determined and governed.	SECAS will review the challenges and update priority levels accordingly. Initial Priority Levels are being determined through consultation with SEC Parties. If the modification is implemented, SECAS is suggesting that any subsequent changes to the configuration of the Priority Levels will need to be approved by the Operations Group.
National Grid Electricity Distribution	Network Party	Yes	We agree with the priority levels and criteria as per section 7 of the Modification Report.	-
Scottish and Southern Electricity Networks	Network Party	Yes	We agree that the priority levels are suitable however we cannot see device alerts detailed in this document which will have an impact on the target delivery times and also carry their own priority levels which we need to understand and fully impact assess the solution.	Priority Levels will be updated to include Device Alerts.
UK Power Networks	Network Party	No	The priority levels listed in Appendix 1 of this refinement consultation response document does not show all message types that Network Operators utilise for managing customers electricity supply.	SECAS will review the challenges and update priority levels accordingly.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			AD1 Power Outage Event is listed as a priority 1 event but equally important are the Power Restore Alerts (x8F35, x8F36 etc). Similarly the SR 7.4 Read Supply Status Service Request Response should be listed as priority 1. The messages/alert types are critical and utilised by network operators for maintaining the electricity supply to customers enabling the correct resources and appropriate actions are taken in the event of customers experiencing a power cut. Any changes delaying these alerts/messages from being sent to network operators will result in customers experiencing a power cut remaining off supply for unnecessary longer periods.	

Question 2: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes/No	We like the approach in principle but had a few comments. <u>Different priorities in different situations (high traffic vs following an outage)</u> There may need to be a different approach to prioritisation (a) during times of high levels of requests, and (b) specifically following a system outage. For example, if a 2.2 vend message can't be processed, the customer may decide to manually enter the UTRN number into their meter. If a lot of customers did this during a system outage, then many of the queued 2.2s might just be rejected once they are eventually sent – in effect there was no point prioritising them. In addition, I&C messages may have timed out, and indeed engineers may have sent repeated attempted I&C messages during an outage. <u>Different priorities at different times of the week</u> Prioritisation may need to be different at different times of the week. For example a prepayment vend (2.2) is most critical during 8am-6pm weekdays, which is outside of the 'non-disconnect calendar'. During these weekday times, a failed vend could mean a customer's supply is	Different situations – while the Priority Levels and associated messages will be fully configurable, it is unlikely that it will be possible to agree and implement changes in the necessary timescales to react to an outage event. SECAS notes the concern regarding a priority being 'mooted' and will discuss this with the Proposer and the DCC. Different times of the week – SECAS will discuss this with the Proposer and the DCC. An 'activation mechanism' for priorities has previously been discounted from the solution due to complexity, however this may not be required for the kind of instance described in the response. Security risks - Amendments to the Service User Retry Buffer (SURB) have been suggested as part of the DCC's

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			disconnected, whereas out of these hours, it would be less critical for a vend to be processed so quickly, provided it did eventually go through. So a 2.2 is most critical at some times of the week, and less critical at other times. The same may apply to other messages. <u>Potential risks</u> There needs to be Security Sub Committee input, as the introduction of Priority Levels could potentially make the system more vulnerable to a Denial of Service (DoS) attack.	CR4879 which should mitigate the potential for Service Users to flood the system causing Denial of Service. These would only include a Service User in the list of SUs for SURB data retrieval if the number of messages for that Service User in the Northbound Message Store is below an agreed level.
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	The DCC system is already experiencing issues related to the processing of messages in a timely manner during high periods of system traffic, e.g., during tariff update periods in response to changes in Price Cap; limitations on FW updates; and returning OTA messages in line with TRT's as per MP208. It is important to note these issues are already being experienced without the DCC operating anywhere near its full capability; there are millions of SMETS1 meters still to be migrated into the DCC and millions of SMETS2 meters still to be installed. Completion of these programmes will significantly increase traffic volumes on the DCC network, and likely	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			lead to further issues/delays being experienced. It is therefore paramount industry accounts for this and ensures this proposed solution is in place as a safeguard, ensuring energy consumer supply continuity related messages are prioritised to prevent against potential consumer detriment, as per system design. We also note DCC's belief that a prioritisation solution needs to be in place to ensure future CSP N performance, as per their Scaling and Optimisation report. We welcome clarity on how the crossover between that report and this modification will be handled – particularly those in relation to cost.	
Electricity North West Limited	Network Party	No	The issue description cites one reason for increased volumes as being: <i>"It has also been noted that delays to the processing of consumer-driven Service Requests could cause the User to resend the same message until the desired Response is received, which may further exacerbate the high volume of messages and cause further delays to Response times."</i> The proposed solution does not address this issue, rather the reverse whereby the proposed solution makes the above more likely as in theory a low priority message could be delayed indefinitely if there is a constant queue	SECAS will discuss the potential for implementing a percentage or 'round robin' approach as part of capacity allocation with the Proposer and the DCC. The DCC will conduct performance testing during Pre-Integration Testing (PIT) to ensure that the performance of the system will allow the DSP to maintain Service Level Agreements (SLAs) for lower priority messages (i.e. ensuring they are not held up indefinitely in practice).

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			of high priority messages thus leading to Users resending the request even more often: • Messages will be processed in order of their Priority Level, regardless of the order in which they are received • Priority Level 2 messages will be processed once there are no Priority Level 1 messages waiting, and so on for the remaining Priority Levels • Newly received messages with a higher Priority Level than the queued messages will be processed ahead of them The solution should instead ensure that a % of processing capacity is dedicated to processing lower priority message queues at all times i.e. • Priority 1 messages are assigned 60% of capacity • Priority 2 are assigned 25% of capacity • Priority 3 are assigned 10% • Priority 4 are assigned 5% This would ensure that lower priority messages are kept moving even if at a lower pace. If the above is not possible based on compute capacity then it could be employed as a 'round robin' processing rule i.e.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			• Process 12 Priority 1 messages • Then process 5 Priority 2 • Then process 2 Priority 3 • Then process 1 Priority 4 and repeat.	
National Grid Electricity Distribution	Network Party	No	We have questions regarding how long until a lower priority Service Request would be held to allow higher priority Service Requests to go through. For example, in storm situations where DCC could be flooded with SRV 7.4's, how long until a Priority 2 service request will trump a Priority 1 service request? Would a priority 2 be held indefinitely until all priority 1' are cleared or would there be a time limit and then they be sent? Depending on how this would work this could result in duplicated SRV's being sent by users due to the delay to their original request. We also question if SRV 2.5 Activate Emergency Credit and SRV 1.5 Update Meter Balance should be a higher priority than 3 as delays could result in Prepayment customers losing supply but we would look to suppliers for guidance on this.	SECAS will discuss the potential for implementing a percentage or 'round robin' approach (described in the previous response) as part of capacity allocation with the Proposer and the DCC. The DCC will conduct performance testing during Pre-Integration Testing (PIT) to ensure that the performance of the system will allow the DSP to maintain Service Level Agreements (SLAs) for lower priority messages (i.e. ensuring they are not held up indefinitely in practice). SECAS will review the challenges and update priority levels accordingly, and update to include Device Alerts.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			We believe that for the solution to be effective it will need a Priority Level mapped to every SRV, Response and Alert. We note SRVs and DCC alerts are detailed in Appendix A, however device alerts aren't, however we understand these are still OTA messages that would impact capacity.	
Scottish and Southern Electricity Networks	Network Party	Yes	We do agree with the high-level solution. Without understanding how device alerts will impact the response times and how the queuing of lower priority traffic will function we cannot understand if the full solution will fully resolve the issue.	The DCC will conduct performance testing during Pre-Integration Testing (PIT) to ensure that the performance of the system will allow the DSP to maintain Service Level Agreements (SLAs) for lower priority messages (i.e. ensuring they are not held up indefinitely in practice).
UK Power Networks	Network Party	No	The prioritisation solution presented mentions that messages will be processed in order of their Priority Level, regardless of the order in which they are received and that Priority Level 2 messages will be processed once there are no Priority Level 1 messages waiting, and so on for the remaining Priority Levels. The solution in principle seems a sensible approach however the proposal does not seem to recognise that from a Network Operators perspective, there should be no delays to alerts and messages required for managing the interruption of supply to customers as any delay would result in customers remaining without electricity supply for	The DCC will conduct performance testing during Pre-Integration Testing (PIT) to ensure that the performance of the system will allow the DSP to maintain Service Level Agreements (SLAs) for lower priority messages (i.e. ensuring they are not held up indefinitely in practice).

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			unnecessary longer periods. This is particularly important during times of high volumes activity such as during storms. We suggest the change request is reviewed to develop an alternative method of managing prepayment meters or the prioritisation matrix is revised to accommodate the above.	

Question 3: Do you agree that the legal text will deliver SECMP0028?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	N/A	Not reviewed – apologies	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	We agree the legal text delivers the solution. In recognising the ever-changing landscape of smart metering, and as per development of modification, we also agree that the priority level assignation is held within a subsidiary document to ensure a modification is not required when a system message needs to change priority, e.g., for an emergency FW update release.	-
Electricity North West Limited	Network Party	No	The legal text only refers to a priority list held within the DSP systems. It does not describe how the priority list is maintained and approved which is necessary to ensure appropriate governance and control is applied to the prioritisation. Furthermore, it is unclear how the DCC measure peak bursts in Demand and how this applies to counting against SLA performance measures. The modification should not be allowed to become a mechanism whereby DCC can simply be absolved of any SLA failures.	SECAS will review the challenges and update the legal text accordingly.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	No	We feel it should be clearly stated what the definition of <i>priority</i> is, how this is decided on and what OTA messages fall into which of these categories so there is no misinterpretation. We also feel that a governance process is needed (either in the SEC or separate document) around changing priority levels and who assigns the priority levels in the event of a new OTA message being created.	SECAS will review the challenges and update the legal text accordingly.
Scottish and Southern Electricity Networks	Network Party	Yes	We do agree with the legal text which notes the device alerts however there needs to be clear details around the devices alerts as these are not detailed below in this document.	Priority Levels will be updated to include Device Alerts.
UK Power Networks	Network Party	No	The legal text needs to clearly define the prioritisation levels and process for the handling of each level with appropriate governance such performance SLAs with responsibilities for each message type/alert including the mechanism for SLA failures.	SECAS will review the challenges and update the legal text accordingly.

Question 4: Do you agree with the proposed implementation approach?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	We agree with the proposed implementation approach. However, we recognise that SECMP0028 is a very old Modification, and there are several other more recent Modification Proposals also addressing prioritisation. There may be a need for these to be addressed together, rather than each in turn. What we don't want is for this to introduce changes in one Release, that then need to be modified or reversed just 6 months later. There should be an overall plan of approach.	SECAS notes the concerns regarding implementation approach. SECAS continues to work with the DCC to ensure that any overlap in scope between different prioritisation workstreams is addressed to prevent duplicate costs or efforts.
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	We would like to see this modification progressed so that it could be implemented in the June 2024 SEC Release, as opposed to November 2024.	-
Electricity North West Limited	Network Party	-	-	-
National Grid Electricity Distribution	Network Party	Yes	We agree with the proposed implementation approach, but note we believe there is still a lot of work to do regarding the solution	-
Scottish and Southern	Large Supplier	Yes	SSEN agrees with the proposed implementation approach.	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Electricity Networks				
UK Power Networks	Network Party	Yes	We agree in principle that prepayment meter consumers are not disadvantaged when topping up their credit level but this should not be to the detriment of credit meter consumers who are in the majority who depend on a good level of service from network operators with an expectation that any interruption of supply will be quickly restored.	The DCC will conduct performance testing during Pre-Integration Testing (PIT) to ensure that the performance of the system will allow the DSP to maintain Service Level Agreements (SLAs) for lower priority messages, thereby ensuring no consumers are disadvantaged by this modification.

Question 5: Will there be any impact on your organisation to implement SECMP0028?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	We presume that the change would only be at the DCC end – and would not require any change to the service request format at our end.	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	No	This modification is largely a DCC system change and does not alter how we interact with the DCC.	-
Electricity North West Limited	Network Party	Yes	Dependent upon the agreed prioritisation of messages and the issues described in response to question 3 then this could require our systems to be changed. It is not possible to quantify the impact based upon the detail currently provided in the modification proposal.	-
National Grid Electricity Distribution	Network Party	-	We feel this modification could potentially impact users however it is difficult to provide a detailed response due to the fact that we don't feel there is enough detail in the solution regarding timescales around lower level priority service requests. Also, if alerts of a lower level are delayed it might be that we need to change how we handle them.	-
Scottish and Southern	Network Party	Yes	We understand at a high level that this modification will impact traffic delivery times but without understanding	-

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Electricity Networks			priority handling time frames and device alert prioritisation we cannot understand the full impact.	
UK Power Networks	Network Party	Yes	We believe that any change introduced by this proposal will be detrimental to consumers if due consideration is not given to Network Operators processes and procedures. It is therefore not currently possible state how we will be impacted and what changes may be required in our systems based on the information provided in this proposal.	-

Question 6: Will your organisation incur any costs in implementing SECMP0028?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	See above – we assume the change would only be at the DCC end.	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	No costs but benefits.	As per response to Q5, this modification does not alter how we interact with the DCC, nor require any changes to our systems. The modification does however offer benefits to us as an organisation. The modification could see less time wasted on site for engineers, leading to improvements and savings on engineering related activity. Top-ups being prioritised accordingly and going through right first time via the solution would lead to less consumers going off supply; reducing consumer contact into our call centres when these events occur which would also provide savings to our business and benefits to consumers.	-
Electricity North West Limited	Network Party	£100k-£250k	Refer to Q5	-
National Grid Electricity Distribution	Network Party	-	Potentially, please see response for Q5	-

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Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	No cost	N/A	-
UK Power Networks	Network Party	More than £1m	Refer to Q5 and please note our response to this question may change.	-

Question 7: How long from the point of approval would your organisation need to implement SECMP0028?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	N/A	-	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	N/A	We would not require any time to implement SECMP0028.	-
Electricity North West Limited	Network Party	Refer to Q5	-	-
National Grid Electricity Distribution	Network Party	-	We feel we are unable to answer due to incomplete solution, please see response for Q5.	-
Scottish and Southern Electricity Networks	Network Party	N/A	N/A	-
UK Power Networks	Network Party	Refer to Q5	-	-

Question 8: What are the impacts to your organisation when the DCC System is offline?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Various	Following an unexpected outage: We would have to reprocess anything that failed in that outage period. <u>I&C issues</u> The longer the outage, the more issues that will be implemented. If 2000 engineers are unable to send or receive messages for 30 minutes, then they may still be on the same job when the system comes back on. If 2000 engineers are unable to send or receive messages for 2 hours then they will have moved on to the next customer appointment, having had to either abort the job, or carry out an 'install and leave', or not start it at all. (Most of our engineer appointments are 45 mins to 1 hour 30 mins.) If a job needs to be rebooked, then there is time and cost associated with rescheduling that new appointment slot (contacting the customer, etc.) as well as the additional engineer time for the second appointment. We may also need to pay compensation to the customer. <u>PrePayment Top Ups</u> Customer top-up vends will not be able to go through, but the customer could alternately enter the 20 digit UTRN code directly into the meter manually. Some customers	SECAS will use this response to inform the business case.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			will do this, but some won't. Some customers will contact us for advice. <u>Call Centre teams</u> In addition to dealing with the above, Call centre agents would be restricted in what they could do for first line fixes/resolutions for customer enquiries, whilst customers are on the phone.	
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	-	Main impacts: • Inability to obtain SMETS1 Top-Up UTRN's which potentially can lead to customer self-disconnections. • Customers do not receive vends automatically. • Inability to retrieve consumer prepayment balances to identify customers in payment difficulty. • Inability on install SMETS2 Smart Metering Systems. • Inability to triage issues in live time which are impacting specific business processes. • Increased incoming call volume for customers. • Increase in customer dissatisfaction as we are unable to resolve any service or meter related queries. • Other specific issues would occur dependant on the time of the DCC outage/being offline.	SECAS will use this response to inform the business case.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	When DCC is offline then time critical messages such as Power Outage, Power Restore, SR7.4 Read Supply status may be delayed or even lost completely. This can have a real-world impact to reporting and resolving electricity distribution faults as quickly as possible.	SECAS will use this response to inform the business case.
National Grid Electricity Distribution	Network Party	-	If the DCC system is offline there is direct impacts to us, for example we will receive no: POA AD1 PRA 8f35 and 8f36, 0x8F37 Supply Outage Restored on Phase 1 0x8F38 Supply Outage Restored on Phase 1 Restored - Outage >= 3 minutes 0x8F39 Supply Outage Restored on Phase 2 Restored 0x8F3A Supply Outage Restored on Phase 2 Restored - Outage >= 3 minutes 0x8F3B Supply Outage Restored on Phase 3 Restored 0x8F3C Supply Outage Restored on Phase 3 Restored - Outage >= 3 minutes 0x8F58 Supply interrupted on Phase 1 0x8F59 Supply interrupted on Phase 2 0x8F5A Supply interrupted on Phase 3	SECAS will use this response to inform the business case.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			alerts and we would be unable to send SRV 7.4 to check supply status to help with fault management on our network.	
Scottish and Southern Electricity Networks	Network Party	-	If the DCC system is offline we will not be able to receive the associated alerts and responses detailed in appendix 1.	SECAS will use this response to inform the business case.
UK Power Networks	Network Party	Yes	When the DCC system is off-line for any reason this will directly impact our operations. We would be unable to utilise BAU processes if the AD1 Power Outage Events and Power Restore Alerts (8F35, 8F36, 8F37, 8F38, 8F3A, 8F3B 8F3C, 8F58, 8F59, 8F5A) are not received as these are integral to our fault management procedures. In addition, if we are unable to send SRV7.4s we would be unable to check energisation status of consumers supply during fault management on the network or when consumers contact us reporting a power cut at their premises.	SECAS will use this response to inform the business case.

Question 9: Do you believe that SECMP0028 would better facilitate the General SEC Objectives?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	Yes, if it achieved the outcome anticipated, without introducing any unintended consequences. However, Prioritisation should only be part of the answer. Fundamentally, there needs to be sufficient capacity for all messages to be processed within target response times. Priority 4 messages still need to be processed, even if they are lower priority.	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	SEC objective A, as per the modification report.	-
Electricity North West Limited	Network Party	No	For the reasons in our responses to Q2 the solution does not better facilitates SEC Objective (a) rather the reverse whereby the proposed solution makes the situation worse as in theory a low priority message could be delayed indefinitely if there is a constant queue of high priority messages thus leading to Users resending the request even more often.	-
National Grid Electricity Distribution	Network Party	-	We believe that this modification could better facilitate SEC Objective (a) and (c) as per the modification report, however not as it currently stands, due to responses provided in previous questions.	-

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (a) and SEC Objective (c) as detailed in the modification report.	-
UK Power Networks	Network Party	No	For the reasons mentioned in our responses above, we believe the proposal in its current format does not facilitate the General SEC Objectives as set out in section C1 and in particular, C1(e): <i>the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy</i>	-

Question 10: Do you believe there will be any impacts on or benefits to consumers if SECMP0028 is implemented?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	Yes, if it helps processes run more smoothly.	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	Consumers will benefit from the increase in system reliability during high periods of DCC traffic. The solution ensures consumers do not experience any unnecessary delay to the delivery of vital messages directly related to consumers' energy supply – it also removes the risk of duplicate vends / failed vends exacerbating capacity related issues. Consumers should also see benefit to the Installation and Commissioning (I&C) process through the solution, both of which should provide a better overall customer service experience for the energy consumer: • Reduction in on-site installation times. • Less consumer disruption through fewer repeat visits to complete installations that otherwise may have been aborted in absence of the solution.	-
Electricity North West Limited	Network Party	-	-	-

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
National Grid Electricity Distribution	Network Party	Yes	We believe that consumers could be impacted by the reasons stated in the Modification Report and possibly benefit from prioritising Service Requests as per the criteria table. However, we also feel there could be a negative impact due to consumers having to wait too long for low priority messages to be received.	-
Scottish and Southern Electricity Networks	Network Party	Yes	We believe that consumers will be impacted by the implementation of priority levels without understanding the timings and inclusion of device alerts we are unsure of the benefits or impacts this will bring.	-
UK Power Networks	Network Party	Yes	We believe consumers are likely to be adversely affected by this proposal in its current format for the reasons mentions in our responses as above.	-

Question 11: Noting the costs and benefits of this modification, do you believe SECMP0028 should be approved?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	TBC	This has potential merit, but it needs more thought, particularly in relation to the other changes that are also progressing on capacity issues and prioritisation. We don't think SECMP0028 can be assessed in isolation.	-
OVO Energy	Large Supplier	-	-	-
Utilita	Large Supplier	Yes	-	-
Electricity North West Limited	Network Party	No	Refer to responses above.	-
National Grid Electricity Distribution	Network Party	-	We don't feel at the moment we have enough information to be able to provide a view.	-
Scottish and Southern Electricity Networks	Network Party	No	Without understanding the impacts of the priority levels and impacts to device alerts we cannot approve the modification proposal in its current state.	-
UK Power Networks	Network Party	No	Refer to our responses above.	-

Question 12: Please provide any further comments you may have.

Question 12			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	There needs to be sufficient capacity, not just a prioritisation process. There may be some unintended consequences, especially if a chain of service requests are required, with differing prioritisations for different stages of that change. There may be some issues with Updated Security Credentials. If we are in the middle of doing this, but the response to 6.15.2 is held up, then the device could have been updated, but we wouldn't have received the response. Then we/customer could end up using the wrong credentials in future requests. There could also be issues surrounding price events. SR 1.2.1 to update a price is Category 3, but in a price event, that might need to be temporarily prioritised, to ensure that processes flowed smoothly.	SECAS will review the challenges and update priority levels accordingly.
OVO Energy	Large Supplier	-	-
Utilita	Large Supplier	N/A	-
Electricity North West Limited	Network Party	N/A	-
National Grid Electricity Distribution	Network Party	N/A	-

Question 12			
Respondent	Category	Comments	SECAS Response
Scottish and Southern Electricity Networks	Network Party	N/A	-
UK Power Networks	Network Party	N/A	-

Appendix 1: OVO Energy proposed priority level challenges

Service Request Name	Service Reference	Service Reference Variant	Critical	Modes of Operation				Priority Level	Rationale	Respondent Comments
				On Demand	Future Dated Response Pattern	DCC Scheduled	Non-Device Request			
Update Import Tariff (Primary Element)	1.1	1.1.1	Yes	Yes	Device	No	No	3	Tariff/price updates are commercial only	Challenge - Used in I&C process
Update Price (Primary Element)	1.2	1.2.1	Yes	Yes	Device	No	No	3	Tariff/price updates are commercial only	Challenge - Used in I&C process

Disable Privacy PIN	3.5	3.5	No	Yes	No	No	No	4	Operational - non-urgent	Challenge - if a customer has moved into a property with a pin they will have to wait to be able to access the meter
Read Prepayment Configuration	4.13	4.13	No	Yes	DSP	No	No	4	Commercial/ settlement use only	Challenge - this is used over the phone with customers to understand balances and support calls
Request Handover Of DCC Controlled Device	6.21	6.21	No	Yes	DSP	No	No	4	Certificate related - non-urgent	Challenge - this is used as part of install and commission
Update Security Credentials (CoS)	6.23	6.23	No	Yes	DSP & Device	No	No	4	Certificate related - non-urgent	Challenge - These are vital to the Gain process

Retrieve Device Security Credentials (KRP)	6.24	6.24.1	No	Yes	No	No	No	4	Certificate related - non-urgent	Challenge - These are vital to the OVO install orchestration
Read Inventory (Current and Future Suppliers may use this Service Request)	8.2	8.2	No	No	No	No	Yes	4	Commercial/ settlement use only	Challenge - this is used as part of install and commission