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Stage 04: Modification Report Consultation Responses

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

SECMP0064 'Alt HAN Co permission to seek access for Alt HAN Activities as a representative of energy suppliers'

About this document

This document contains the collated responses to the SECMP0064 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Cordelia Grey on 020 7090 1072 or email SEC.Change@gemserv.com.

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0064.

The Change Board will consider these responses at its meeting on 19 December 2018, where it will determine whether SECMP0064 should be approved or rejected and make this recommendation to the Authority who will decide whether the modification is approved or rejected.

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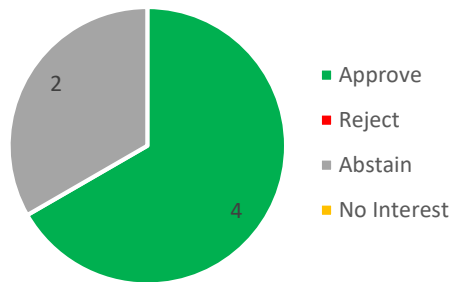
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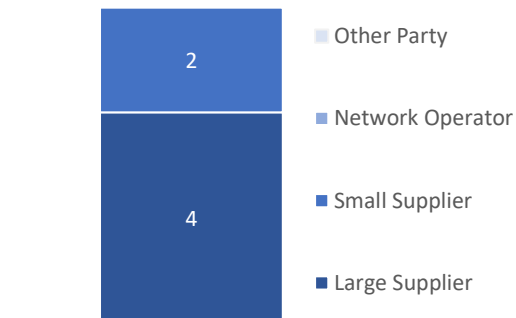
Summary of Responses

This section summarises the responses received to the SECMP0064 MRC.

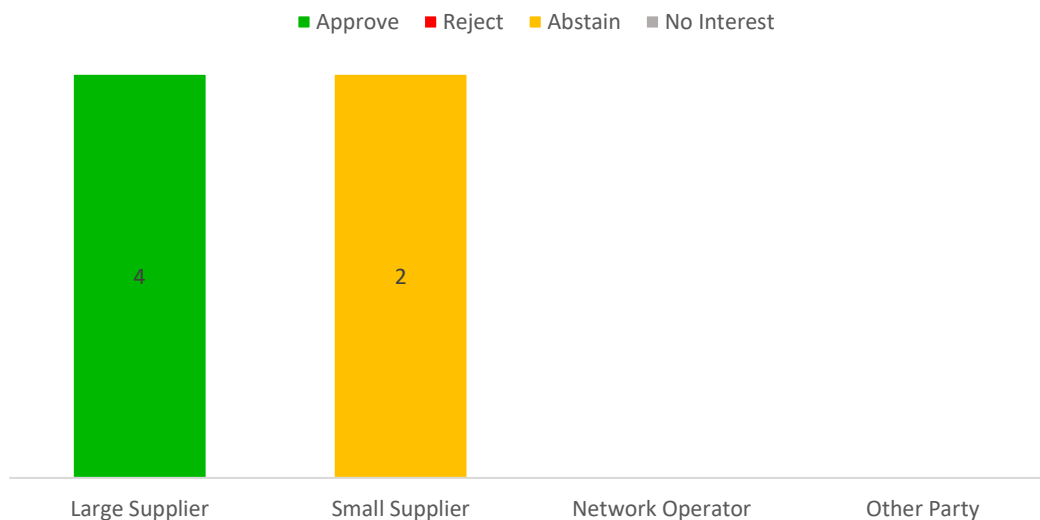
Respondents Views



Number of Respondents
(by Party Type)



Views by Party Type



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Question 1

Q1: Do you agree that the [proposed/alternative] solution better facilitates the SEC Objectives and should therefore be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF Energy	Large Supplier	Yes	We believe that that proposed solution better facilitates SEC Objective (h) as it will enable the Alt HAN Activities that are being undertaken on behalf of all Suppliers to be carried out effectively and efficiently.
Utility Warehouse	Large Supplier	Yes	Yes, this better facilitates SEC Objective (h) as it will assist Alt HAN Co in delivering the Alt HAN Activities on behalf of all Relevant Suppliers.
npower	Large Supplier	Yes	<p>We are in support of this modification and believe it facilitates SEC objective H, enabling energy suppliers to meet their licence obligations with respect to delivering Alt HAN Activities effectively and efficiently. The permission to seek access to the buildings will enable Alt HAN Co to determine which premises will benefit from the installation of Alt HAN Equipment.</p> <p>We believe this will aid the smart metering deployment in a more cost effective manner for all parties and will result in less aborted visits which can only be a positive for the consumer experience</p> <p>We would want to make sure that we retain control over contact with our customer. This Mod needs to preserve that. However, contact in a multi-supplier building or where access</p>

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			should be with the building manager / owner is of benefit and is a more efficient way of managing such a situation.
Bryt Energy	Small Supplier	Neutral	Neutral – While the obligations convey the correct approach, without understanding who the sub-contractors are, we are not able to comment if we would allow them to represent us.
Bristol Energy	Small Supplier	Neutral	Bristol Energy are neutral in this regard.
Centrica	Large Supplier	Yes	Yes, as is consistent with section Z of the SEC re Alt HAN arrangements and therefore implementation will better facilitate General SEC Objective (h).

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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0064 should be approved?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree that SECMP0064 should be implemented, but we would like to emphasise the point made in the Modification Report that further detail will be required about how these site survey visits will be undertaken and how the permission that has been granted will actually be used in practice before any site visits are carried out.
Utility Warehouse	Large Supplier	Yes	Yes, we believe this modification should be approved. As the scope of these permissions are limited to delivering the Alt HAN Activities, which are non-intrusive by nature, we are satisfied there are appropriate conditions for these permissions and appropriate justification for requiring these.
npower	Large Supplier	Yes	We believe the benefits in the implementation of this modification will outweigh any costs.
Bryt Energy	Small Supplier	Neutral	Neutral – While the obligations convey the correct approach, without understanding who the sub-contractors are and the cost, we are not able to comment if we would allow them to represent us.
Bristol Energy	Small Supplier	Neutral	Bristol Energy are neutral in this regard.

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Centrica	Large Supplier	Yes	Yes (cost is minimal (£1200)) No impact on DCC. The Alt HAN policy/surveyor contract needs to be sufficiently robust re best practice/relevant standards as well as addressing concerns of lack of consumer awareness and misuse/fraud. Work with Energy UK's Fraud Working Group is required.
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Question 3

Q3: Do you agree that draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree with the draft legal text.
Utility Warehouse	Large Supplier	Yes	We have no comments on the draft legal text.
npower	Large Supplier	Yes	
Bryt Energy	Small Supplier	Neutral	<p>Neutral – While the obligations convey the correct approach, without understanding who the sub-contractors are, we are not able to comment if we would allow them to represent us.</p> <p>If this is not possible, we would recommend SEC Users have the ability to “OPT OUT” out of representation, if the sub-contractor did not meet ethical standards for example of the SEC User. (See question 5)</p>
Bristol Energy	Small Supplier	Neutral	Bristol Energy are neutral in this regard.
Centrica	Large Supplier	Yes	The ability to represent all suppliers is very broad, however, we expect that the necessary consumer protections will be dealt within Alt HAN contractual documentation and it is not required within the SEC.

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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree with the implementation date, and that this change should be made at the earliest possible opportunity in order to facilitate site surveys being undertaken in line with the Alt HAN activity plans.
Utility Warehouse	Large Supplier	Yes	
npower	Large Supplier	Yes	
Bryt Energy	Small Supplier	Neutral	No - While the obligations convey the correct approach, without understanding who the sub-contractors are, we are not able to comment if we would allow them to represent us. We would recommend that the sub-contractors be known before legal text is added to SEC obligations.
Bristol Energy	Small Supplier	Neutral	Bristol Energy are neutral in this regard.
Centrica	Large Supplier	Yes	Alt HAN Co should be consulted on the appropriate implementation date, against current plan.

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Question 5

Q5: Do you have any further comments?

Party Name	Party Category	Comments
EDF Energy	Large Supplier	<p>As previously noted this Modification should be regarded as facilitating the development of the processes for undertaking site surveys as part of the Alt HAN activities. This change will enable a consumer friendly process, supported by Supplier permission, to be developed and implemented.</p> <p>This change should not be regarded as giving permission for Alt HAN Co (or their service providers) to start undertaking these site surveys as an agent of the Supplier. Further work is required, via the Alt HAN Forum, to ensure that the site survey activity is fully defined, delivers the best possible customer experience and meets the expectations of consumers.</p>
Utility Warehouse	Large Supplier	No.
npower	Large Supplier	No.
Bryt Energy	Small Supplier	Bryt Energy & our parent company Statkraft pride ourselves on our ethical conduct and have ethical policies in place, that prevent us with working with types of companies. In these instances, if a sub-contractor did not meet our ethical standards we would not allow them to represent Bryt Energy.
Bristol Energy	Small Supplier	Bristol Energy would like to understand how the Alt Han Co surveyors will identify and consider vulnerable customers in this activity. It is also unclear how the surveyors will identify themselves when presenting themselves at MDU's for which many will have multiple suppliers.

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Centrica	Large Supplier	N/A
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