

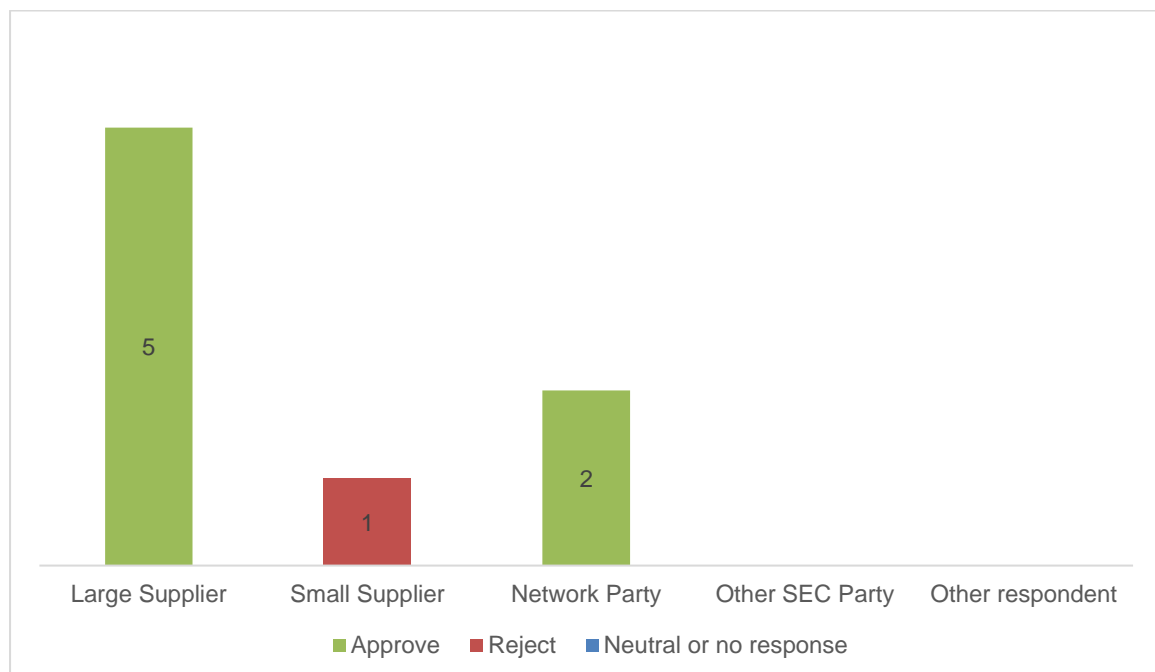
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SECMP0018 ‘Standard Electricity Distributor Configuration Settings’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the SECMP0018 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that SECMP0018 should be approved?

Question 1			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Approve	<p>We agree that this change better facilitates SEC objective (a) as it will ensure all meters are appropriately configured at the point of installation without the need for unnecessary over the air communication to apply what are default settings.</p> <p>For the avoidance of doubt we believe that this change is neutral against the other SEC Objectives, including objective (e).</p>
Bryt Energy Limited	Small Supplier	Reject	<p>We do not think the implications of this change have been fully understood and the parties in favour to this MOD do not appear to be forthcoming on the costs savings proposed.</p> <p>There are several points that seem to have been overlooked:</p> <ul style="list-style-type: none"> Any GBCS change could result in a change under CPA, meaning both SMETSV2 and SMETSV3+ devices would need to re-enter CPA for the change. This has not been agreed for all manufacturers or stated by BEAMA. While no firmware upgrade to existing devices is expected, any devices removed and “re-circulated” would not contain the default settings as they would be on different firmware. This would result in potentially two branches of firmware for each electric meter, to be managed by the supplier. BEAMA and manufacturers are silent on the actual costs to the industry and to SEC Suppliers and ultimately to customers.

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Question 1			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> SEC DNO users have not presented a benefits case of the savings on their not managing their smart portfolios for this configuration item. This benefit is surely small if they are using this process now? Are we to believe that a SEC USER FTE manually triggers each configuration flow? Or in response to commission alert they create automated configuration SR's? The proposers have not actually defined the current process from a SEC DNO perspective and if a solution is actually needed. Only two DNO's responded, conveying only two will benefit. Do all DNO agree with the default configuration? Or is the case only two DNO's are actively managing these config settings? DCC has provided not costs to reduction in SR flow across the system and how that equates to cost savings across the lifetime of the service. DCC has provided no costs for integration and regression testing against each CHUB variant. No thought or cost has been attributed to testing and each SEC Supplier to undertake regression testing for both SMETS V2 and V3 devices. It places a clear DNO requirements for its management of smart devices onto another party to deliver and maintain. To date this has not worked well in the DNO Security Certificates at Install and Commission. <p>In short we do not believe the cost to implement across all parties outweighs the current cost of the existing solution already in place and being managed by SEC parties at present and require rework to fully explore and understand costs vs. benefits before agreeing to this change.</p>

Question 1			
Respondent	Category	Response	Rationale
Western Power Distribution	Networks Party	Approve	We believe that this modification should be approved as it better facilitates SEC Objective (a) as it will facilitate the efficient installation and operation of ESMES. It will reduce traffic across the Smart Metering Infrastructure as ESMES will not require configuration at install. I will also ensure consistency across the system.
npower	Large Supplier	Approve	We believe this modification will better facilitate the SEC objectives outlined within the proposal.
Northern Powergrid	Networks Party	Approve	<p>Currently, Electricity Network Parties (ENPs) are required to configure new Electricity Smart Metering Equipment (ESMEs) with appropriate settings through relevant Service Requests as soon as the meter has been installed and commissioned. The configuration of ESMES needs to occur for every new meter installation to set thresholds for voltage events on the ESP's network. This process is proving to be a burden because every meter has to go through this process.</p> <p>With all ESMES receiving a standard suite of settings at the point of manufacture, ENPs will only need to update these fields when a change is required to the existing default data, on a case-by-case basis. Fewer Service Requests will therefore need to be sent. This would result in a reduction in DCC traffic, or enable the traffic to be scheduled to reduce the impact on the DCC systems, thus increasing the efficiency of the Smart Meter installation.</p>
Centrica	Large Supplier	Approve	We agree with the Working Group conclusion that implementation of SECMP0018 will better facilitate relevant objective (a) the efficient provision, installation, operation and interoperability of ESMES as it will better enable the ENPs to define network events to provide operational and planning related information. This is due to parameters, particularly the voltage thresholds and measurement periods, being

Question 1			
Respondent	Category	Response	Rationale
			pre-configured to the default settings sought by ENPs. It will also reduce the traffic in DCC systems and allow the traffic to be scheduled to reduce the overall impact on the DCC systems
ScottishPower	Large Supplier	Approve	Such standardisation will reduce DCC traffic and increase the efficiency of the installation process.
E.ON	Large Supplier	Approve	We believe that this Modification better facilitates objective a via increasing the efficiency with which standardised default values are set on electricity Smart Meters prior to installation. Mandating the requirement for Network Operators' preferred default values to be present in electricity Smart Meters prior to their installation will increase the efficiency of the DCC's Total System via a reduction in Service Request (SR) processing, and it will facilitate robust governance of any changes required to these default values.

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

Question 2		
Respondent	Category	Comments
EDF	Large Supplier	<p>It is noted in the consultation document that, if approved, this change will generate a new version of GBCS, but the changes are text-only. While this might be the case, the impacts of creating a new version of GBCS and including it within the TS Applicability Tables need to be thought through, especially if Suppliers are required to upgrade their devices to be compliant with the new GBCS version (even this is only on the CPL) to ensure that they remain compliant with their licence obligations.</p> <p>A significant number of issues arose from the creation of GBCS v1.1 which was also a 'text-only' change for a number of devices that were already compliant with the new standard. The lessons learnt from that experience need to be applied to this proposed new version in order to ensure that implementation does not create issues or result in unintended consequences.</p> <p>Given that SEC Parties already have an obligation (under Appendix AC) to apply the "NP Configurable Data Items' as provide by the Network Operator, it might be more prudent to include this change in a future version of GBCS alongside more material changes, rather than creating a new version purely for this cosmetic change to the content.</p>
Bryt Energy Limited	Small Supplier	This MOD should not be implemented.
Western Power Distribution	Networks Party	No further comments.
npower	Large Supplier	none
Northern Powergrid	Networks Party	None
Centrica	Large Supplier	n/a
ScottishPower	Large Supplier	We were surprised not to find any mention of randomisation in the documentation.

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Question 2		
Respondent	Category	Comments
E.ON	Large Supplier	n/a