

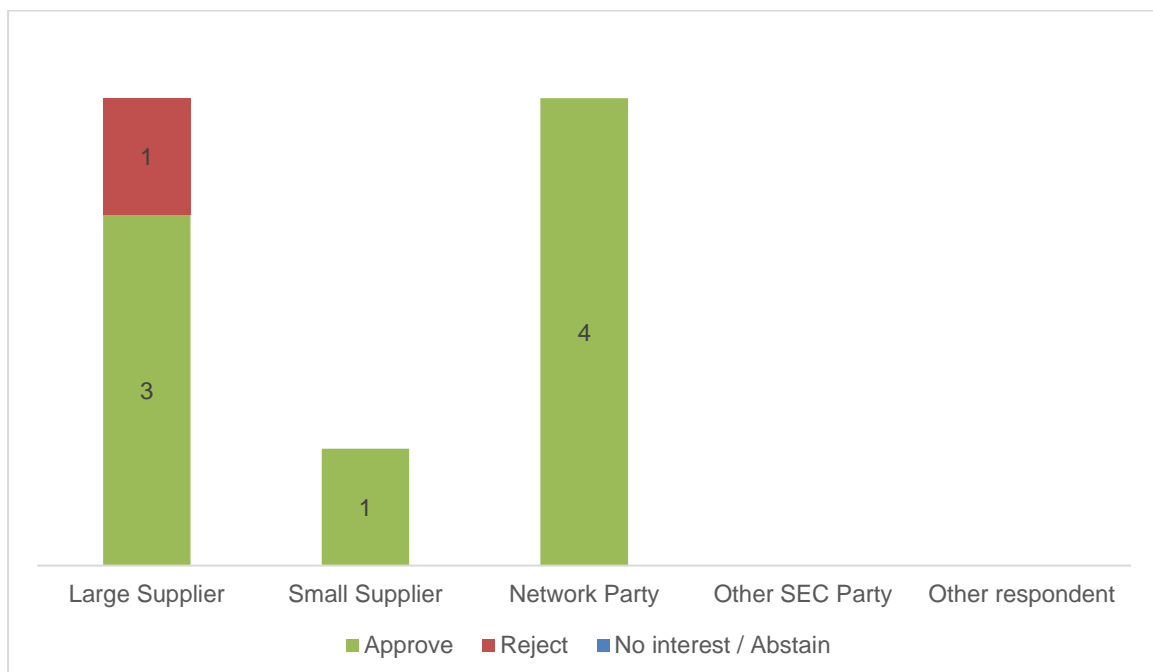
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# SECMP0025 ‘Electricity Network Party Access to Load Switching Information’ Modification Report Consultation responses

## About this document

This document contains the full non-confidential collated responses received to the SECMP0025 Modification Report Consultation.

## Summary of responses



## Question 1: Do you believe that SECMP0025 should be approved?

Question 1			
Respondent	Category	Response	Rationale
<b>SSEN</b>	Networks	Approve	As the proposer of this modification our views have not changed regarding the requirement for Electricity Network parties to have access to the data proposed in this modification.
<b>Northern Powergrid</b>	Networks	Approve	<p>Electricity Network Parties would have access to more types of information from new Service Request Variants and Alerts relating to ALCS and HCALCS. This will enable them to monitor what is happening on low voltage networks more accurately, and ultimately make more informed decisions regarding network management and reinforcement. These data items will also be used alongside individual customers load behaviour to assess networks incidence faults and asset condition.</p> <p>Alignment of customer load switching times is likely to have a significant impact upon distribution network peak loading, to the extent that some networks may become overloaded if the switching times are changed from their present values. As Suppliers change existing metering systems for smart meters, the load switching times applied to ALCS and HCALCS may change and thus impact distribution network peak load. Providing ENPs with the ability to access load switching information (in particular the switching calendar) in Smart Meters will enable them to better understand the nature of a peak load problem. This will allow them to be better placed to consider alternative smart solutions as alternatives to expensive network reinforcement schemes which would ultimately be borne by customers.</p>
<b>EDF Energy</b>	Large Supplier	Approve	We agree that SECMP0025 should better facilitate SEC Objective (e) as it will provide Network Operators with information that should allow them to better understand the use of

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			their networks, and avoid costly reinforcement where that action is not necessary, which would ultimately be paid for by consumers.
<b>Western Power Distribution</b>	Networks	Approve	This modification better facilitates SEC Objective (e) as allowing Electricity Distribution Network Operators access to the load switching information will help ensure that a secure and sustainable supply of electricity can be delivered to consumers.
<b>Electricity North West Limited</b>	Networks	Approve	We agree with the Working Group members' views that SECMP0025 will better facilitate SEC Objective (e) as this solution will better contribute to the delivery of a secure and sustainable Supply of Energy.
<b>Smartest Energy Ltd</b>	Small Supplier	Approve	<p>This modification will allow ENPs to ensure that the customer we supply have a secure and sustainable electricity supply, without the need for supplier intervention.</p> <p>This modification better facilitates SEC Objective (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</p>
<b>npower</b>	Large Supplier	Approve	Provided the information requested is GDPR compliant, We believe this will assist the ENP's to manage load on their networks in an efficient manner.
<b>Centrica plc</b>	Large Supplier	Reject	<p>Whilst we agree that implementation of this modification proposal could lead to the furtherance of relevant objective (e), we do not believe that the likelihood of this has been demonstrated.</p> <p>For example, the amount of load that is controlled via load control switches, either now or in the future, is unclear. The modification report refers to new technologies such as new types of heating systems and electric vehicles. Neither of these new technologies are likely to be connected to smart metering load switches but instead will be controlled though, for example, home energy management systems. This is recognised in SEC Modification</p>

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			<p>Proposal 0046 (“Allow DNOs to control Electric Vehicle chargers connected to Smart Meter infrastructure”) where DNOs are proposing to have the ability to control HICALCS/ALCS in order to remove (or reduce) EV charging demand if the load could compromise an LV network. We do not believe that this modification, in isolation, has demonstrated that there will be sufficient load on control switches that could, though DNO access to the data, prevent the need for reinforcement.</p> <p>We also have concerns over the costs and implementation timescales for this proposal. The DCC has previously advised that implementation costs beyond PIT will be absorbed in the Enrolment &amp; Adoption (E&amp;A) project implementation in November. As the implementation plan for E&amp;A has now changed, and there is no implementation in November, it is unclear as to whether additional costs would now be incurred.</p> <p>Based on the above concerns, we cannot support approval of this modification at this time.</p>
SSE	Large Supplier	Approve	None.

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

Question 2		
Respondent	Category	Comments
<b>SSEN</b>	Networks	<p>This change is significant to SSEN, the changes detailed in the modification need to be in place before Energy Suppliers commence installing SMETS2 smart metering systems that control load and tariff switching (either via ALCS or HCALCS).</p> <p>We would therefore urge the authority to make their decision before the 31<sup>st</sup> March 2019 in order that this change can be implemented in the November 2019 SEC Release.</p>
<b>Norther Powergrid</b>	Networks	None.
<b>EDF Energy</b>	Large Supplier	<p>While we agree that this change should be made based on the business case presented, we remain concerned whether this change will ultimately deliver value for money. Some form of post-implementation review, whenever this might be possible, to determine whether the outcomes that were intended by the Modification were achieved would be useful.</p> <p>We note that, even with the approval of SECMP0018, there is no obligation on Suppliers to use specific or consistent ALCS Description Labels when configuring ALCS functionality on a smart meter. This could compromise the achievement of the benefits forecast by the Network Operators if they are not able to use the data they receive to conduct the level of analysis they require. Depending on the accuracy/consistency of the data they receive, the Network Operators may need to consider further Modification to mandate the use of specified ALCS Description Labels.</p>
<b>Western Power Distribution</b>	Networks	<p>Western Power Distribution are supportive of this modification, however we do have some queries currently raised with the DCC regarding the ESME Variant information being provided. Both the N16 alert and the SRV 8.2 response should detail the ESME variant which will allow us to identify whether the ESME that has been installed and commissioned has ALCS or not, however, currently there are discrepancies as the N16 is</p>

Question 2		
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		<p>not returning the same information as the SRV 8.2 and in some instances the SRV 8.2 is not providing the same information that is visible on the SMI.</p> <p>As mentioned these are all currently with the DCC for investigation but we felt it prudent to mention it in our response, as in order for us to benefit properly from this modification, these issues will need resolving.</p>
<b>Electricity North West Limited</b>	Networks	None.
<b>Smartest Energy Ltd</b>	Small Supplier	<p>The working group noted that a possible workaround would be for a “friendly supplier” to allow Distributors to test the new functionality.</p> <p>Depending on requirements for testing, Smartest Energy would be happy to work with the DCC and Distributors.</p>
<b>npower</b>	Large Supplier	None.
<b>Centrica plc</b>	Large Supplier	None.
<b>SSE</b>	Large Supplier	<p>We note that the Solution Design Specification includes Business Requirements that change the use case, which impacts manufacturers and would require a new version of GBCS. This is a significant impact that has not been captured in the Consultation. We believe that the solution needs further consideration before approval, and that this needs to be viewed by the impacted parties.</p>