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# SECMP0025 ‘Electricity Network Party Access to Load Switching Information’ Change Board vote

## About this document

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This document summarises the discussions of the Change Board on SECMP0025 and the outcome of the vote.

This vote forms a recommendation to the Authority on SECMP0025.

## 1. Change Board discussions

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### Original views and discussions on the proposal

The Change Board discussed this modification on 27 February 2019.

SECAS provided an update on the responses to the Modification Report Consultation noting that out of the nine non-confidential responses, eight were in favour of approving SECMP0025 and one was against.

One Other SEC Party member raised a concern that they had been unaware the modification would impact manufacturers and the short Modification Report Consultation window did not provide enough time to submit their views. Additionally, they wished to understand how the modification would affect meters and stated the approval process had felt rushed. SECAS confirmed that should the Change Board agree further work was required then they had the option to send SECMP0025 back to the Panel. One Large Supplier member confirmed that they had sat on the Working Group and was comfortable that the solution presented would not change should it be sent back, and therefore felt it would not be a worthwhile endeavour and would have no perceivable benefit.

One Network Party member highlighted that SECMP0025 had been originally raised in 2016 and had since undergone a lengthy Refinement Process, a Working Group Consultation and two Modification Report Consultations, in which any concerns or queries should have been raised so they could be adequately addressed.

One Large Supplier member raised concerns on the costs involved with implementing the modification and the impacts to Suppliers' internal systems. There was also uncertainty surrounding the overall November 2019 Release costs and the modifications that were expected to be included in that. Large Supplier members also questioned whether there was any significant benefit in the modification being implemented in November when it could be implemented later for the same desired effect, potentially as part of a wider change. Network Parties confirmed the modification would provide visibility to them of load switching arrangements that was not currently available, and that the intent of the modification was justified within the report accompanied with a clear business case. They also highlighted the switch-off of the Radio 4 teleswitching signal due for March 2020 but which may be extended a year, and that Network Parties needed time to prepare alternative arrangements.

The DCC confirmed they were able to implement SECMP0025 in the November 2019 Release, provided approval was received from the Authority before the end of March 2019. SECAS confirmed that should approval be received after 31 March 2019 then SECMP0025 would fall back to the June 2020 Release. The Change Board encouraged the Authority to make a decision as soon as possible, to ensure clarity on the way forward.

One Large Supplier member noted that Suppliers would not benefit from the change but would still be paying for its implementation but understood there was a benefit for Network Parties. One Other SEC Party member stated that further work should be carried out on the solution through further refinement. There was also a concern raised over the absence of any Post-Integration Testing (PIT) costs provided, although it was noted that any post-PIT costs will be absorbed by the DCC if SECMP0025 was implemented in the November 2019 Release. The Large Supplier member also queried how these costs were going to be absorbed by the Enrolment and Adoption project, which has now been pushed back and no longer anticipated to go live in November.

One Network Party member requested SECMP0025 proceed to vote rather than delaying the progress any further, as the change would benefit Network Parties in their capability of managing

potential overloading of systems. This in turn would provide the opportunity to consider alternatives to expensive network reinforcement schemes. The DCC reiterated they were ready to deliver the necessary changes for November 2019.

The Change Board agreed to proceed to a vote as they did not believe there would be a benefit in sending the modification back to the Panel or the Working Group.

### Subsequent views and discussions on the proposal

The Authority's send-back on 13 March 2019 meant the Change Board's previous vote became null and void. The Change Board was therefore asked to repeat the vote following the Panel updating the Modification Report, and this was performed by correspondence over the period 18-20 March 2019.

One Network Party member believed that 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 Auxiliary Load Control Switches (ALCS) and Home Area Network Connected Auxiliary Load Control Switches (HCALCS) may change and thus impact distribution network peak load. Providing Electricity Network Parties 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.

One Large Supplier member reiterated they were still unable to support the proposal due to the uncertainty around benefits, noting that nothing has changed following the Authority send-back. They were unconvinced that implementation of the modification will result in real benefits to Electricity Network Parties, and did not believe sufficient analysis or forecasting has been carried out on the amount, or proportion, of demand that will become visible to them through this modification (and/or when this may be). However, if the Authority determines that the modification should be implemented then they fully support implementation in the recently approved November 2019 SEC Release.

Another Large Supplier member commented that while this change should be made based on the business case presented, they believe that it needs to be ensured that this change ultimately delivers value for money. They considered whether some form of post-implementation review, whenever this might be possible, to determine whether the outcomes that were intended were achieved would be useful.

One Other SEC Party member noted they were not convinced of the benefits case that is being claimed. They did not see the evidence of a degree of uptake of ALCS and HCALCS to justify the apparent urgency that is being applied to the implementation and felt this is not adequately covered in the Modification Report.

The other members who voted did not provide any additional views and comments from what had been originally discussed.

## Views against the General SEC Objectives

### Objective (e)<sup>1</sup>

Change Board members who voted to approve this change believed that SECMP0025 will better facilitate SEC Objective (e). These members believed the modification would provide Network Operators with information that should allow them to better understand the use of their networks and avoid costly reinforcement where that action was not necessary.

However, some Large Supplier and Other SEC Party members also noted that, for reasons provided previously, due to the uncertainty over the costs and the feasibility of the November 2019 Release, it was difficult to approve the modification at this stage despite the benefits relayed by Network Parties. The ultimate cost of implementing SECMP0025 would also be borne by all Suppliers and with that in mind a number of Large Supplier members confirmed they would be unable to approve SECMP0025. Additionally, the majority of the Other SEC Party members agreed the full impact on manufacturers had not fully been considered and further work was required. As such, they could not see how the SEC Objectives were better facilitated.

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<sup>1</sup> Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

## 2. Change Board vote

### Change Board recommendation

The Change Board voted to recommend that the Authority should **reject** SECMP0025.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	2	2	0	<b>Reject</b>
Small Suppliers	2	0	0	<b>Approve</b>
Network Parties	2	0	1	<b>Approve</b>
Other SEC Parties	0	2	0	<b>Reject</b>
Consumer Representative	0	0	0	-
<b>Overall outcome:</b>				<b>REJECT</b>

This is a summary of the second vote, following the first vote becoming null and void.

The Consumer Representative did not participate in the vote. One Network Party member declared an abstention as this modification would not impact on Gas Transporters.

Please note that where the Change Board vote is split, the outcome of the vote is to reject the proposal.