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SECMP0062 ‘Northbound Application Traffic Management – Alert Storm Protection’

Working Group Consultation responses

About this document

This document contains the full non confidential collated responses received to the SECMP0062 Working Group Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	While we agree in principle that the solution will meet the objectives of preventing alert storm capacity issues within the DCC and SEC User Systems, we are concerned two key steps need to be taken in parallel to support interim: • The change in alert management architecture and alert storms was discussed in detail in initial DCC design workshops and discounted on the basis that DCC and DSP should not be responsible for alert management and pass all traffic to the SEC User. In this instance several actions need to be agreed before this MOD is passed: ○ TABASC agreement that the solution architecture and principles for DCC are changed under alert management; ○ Root cause analysis on the current devices causing anomalous alert volumes, identifying alert type, identifying if the alert type is a valid GBCS alert device type, device firmware, SEC User; (Additional data should be time date postal code should be used to enrich the analysis) ○ Identification of alert storms on the proposed alerts not to be subject to "Throttling", in which would circumvent the proposed solution; ○ SSC should be notified of the volume of anomalous alerts & types; i.e. at present we do not know if they are security related and pose a genuine security risk to a device or firmware • DCC and SEC Users under the SEC have an obligation to investigate into anomalous alert & alert volumes as per their internal ISMS Policies;

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			○ If this issue is related to a manufacture, device, particular firmware or particular alert, these parties along with SEC User should be tasked with resolving the issue at their cost; • DCC should undertake this root cause analysis and present into SEC Operations Working Group and task SEC Users to identify if the devices they currently supply and are responsible which are producing alerts that are anomalous a root cause based on: ○ Genuine root cause reason; i.e. Large DNO outage in a geographical postal code; ○ Anomalous root cause in device; i.e. Firmware Defects, Incorrect Device Configuration, Device Defects, Security Defects/Incidents ○ Identify SEC Users not actively managing anomalous alerts; ○ Core defect within GBCS or associated technical specifications; ○ SEC Users to report back with analysis and next course of actions; ○ Framework for interim analysis, reporting and monitoring agreed to be conducted on a regular basis until the DCC solution is fully implemented; Proactive root cause analysis needs to be undertaken urgently for the following reasons: • If the current anomalous alert volume increases exponentially inline with current installations this could cause outages to the DCC and severely impact SEC Users • SEC Users could through CoS Gain be in receipt of unanticipated volumes of anomalous alerts that their architecture and solutions may not be able to cope with;

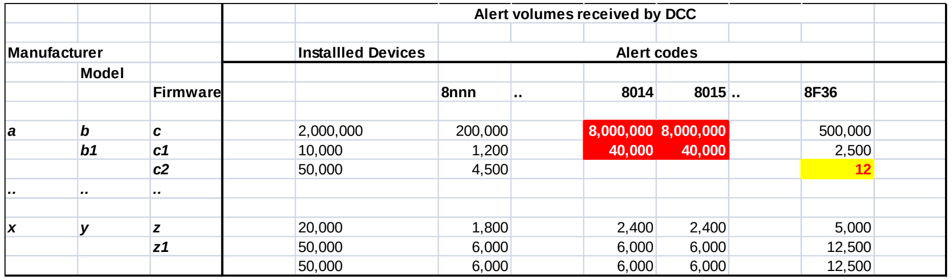
Question 1			
Respondent	**Category**	**Response**	**Rationale**
			With this said, we would still recommend the throttling solution to minimise any future incidents, however recommend that anomalous alert management be tabled as an item in the Operation Working Group on a monthly basis to identify trends.
EDF Energy	Large Supplier	Yes	We agree that the proposed solution appears to be reasonable, and would reduce the number of alerts that are unnecessarily processed through the DCC systems and consume processing resources unnecessarily. A clear definition of what constitutes a duplicate or excess alert will need to be clarified in order to develop the technical solution. It may be necessary to differentiate between alerts that are sent repeatedly as a result of an ongoing issue/situation/state in regards to the device sending the alert, as compared to repeat alerts that are occurring because the same situation/issue is being created repeatedly. In the latter case filtering the alerts may serve to hide the true nature of the problem.
Western Power Distribution	Networks Party	No	We believe that the solution will help protect the DSP and User systems against only some Alert Storms and unnecessary volumes of traffic.
SSEN	Networks Party	No	This should assist in providing a throttle on the amount of device alerts we are currently receiving and alleviate pressure on our adapter based on current volumes. However, this will not solve the issue for all alerts that should be supressed or assist in a sustainable throttle notification mechanism.
E.ON	Large Supplier	Yes	E.ON understands Alert Storms are one of the biggest issues faced by the DCC and recognises the DCC needs to take direct action to protect their systems and ensure availability of service. E.ON is supportive, in principle, for the need to implement changes.
Npower	Large Supplier	Yes	Will prevent DCC from falling over due to alert storms

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Smartest Energy	Small Supplier	Yes	As a small supplier resource is/can be limited meaning there will inevitably be scenarios where Alerts are missed. Some alerts may be deemed more important than others (depending on the organisation) potentially resulting in a poor service from their Service Provider. Utilising software that is already used in one way or another (Alert Anomaly Detection Thresholds) would make it easier to manage Alerts as they come in, along with helping with any triage completed to prevent further alerts in the future.
Electricity North West	Networks Party	No	No we do not agree. Whilst we wholeheartedly agree with the need for traffic management to be implemented in order to protect both Users and the DCC system from device alert storms we view the proposed solution as too complicated and lacking the overall market intelligence to identify and remediate problematic smart meter models in an efficient manner. It is our view that alert storms in the vast majority of cases are not generated by 'individual' faulty devices but by problems affecting specific manufacturer/model/firmware versions, as such if one variant of meter is affected it is highly likely that large volumes of the same variant meters will also be impacted. This is already evidenced by a known SMETS2 meter model variant which is currently generating millions of incorrect 8014/8015 alerts. Having a system which throttles (discards) a proportion of the alerts at an individual device level goes some way to alleviating the problem but the DCC's focus should be on identifying and resolving root cause by examining device behaviour at the aggregate not the individual device level.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			We do not see the rationale of opening an incident for each individual device which has been subject to throttling, this simply creates a large burden of work both for the DCC and for end Users and given current issues with SSI performance and usability could possibly render the SSI system unusable. This is highly likely to lead to additional remediation work being required in the SSI and even more cost. Nor do we see any rationale for adding metadata to the % of alerts which have not been throttled in order to inform the User that other alerts have been throttled. Again using the example of the 8014/8015 alerts there are simply too many affected devices for Users to deal with this in this manner. It is another unnecessary cost which offers little value to the end User. We strongly suggest that a simpler approach is adopted by DCC: 1) The solution should throttle (discard) alerts as currently proposed. We note that DCC already have the mechanism to identify these alerts and therefore the only changes needed are those to discard the unwanted alerts. 2) Individual incidents are NOT raised for affected devices 3) NO changes to alert metadata or DUIS 4) DCC provide a ‘day after’ report to all parties detailing alert volumes by meter variant (possibly indicating meter variants to which alert throttling has been applied). Parties will use the report to look at alert volumes to identify discrepancies from the expected norm. Having a single report across all parties will help provide a ‘total view’ and avoid unnecessary duplication of effort

Question 1			
Respondent	Category	Response	Rationale

. e.g.:



			Alert volumes received by DCC						
Manufacturer			Installled Devices	Alert codes					
	Model								
		Firmware		8nnn	..	8014	8015	..	8F36
a	*b*	*c*	2,000,000	200,000		🟥 8,000,000	🟥 8,000,000		500,000
	b1	*c1*	10,000	1,200		🟥 40,000	🟥 40,000		2,500
		c2	50,000	4,500					🟨 12
..	..	..							
x	*y*	*z*	20,000	1,800		2,400	2,400		5,000
		z1	50,000	6,000		6,000	6,000		12,500
			50,000	6,000		6,000	6,000		12,500

An aggregated report should also be produced on a weekly and monthly basis.

5) The DCC should act as the primary owner of any issues identified and raise problem records to track accordingly – noting that DCC will not be responsible for actual resolution of defects if they are proved to be caused by faulty or non-compliant meters.

Such an analytics based approach will enable problematic meter variants to be identified promptly and for corrective action to be taken at an early stage.

In addition to identifying meter variants which are generating excess alerts it will also help identify meter variants which are NOT generating expected alerts. Such as known issues where Power Restore (8F36) alerts are not being received when power is restored to devices following a Power Outage (AD1).

Question 2: Will there be any impact on your organisation to implement SECMP0062?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	Any changes to DUIS and changes to alert management would require internal review. Any new management process and root cause analysis would required additional resources internally where required.
EDF Energy	Large Supplier	Yes	This change would reduce the amount of effort that is required for our systems to process and manage alerts. Ultimately the action we take is going to be the same as the underlying issue generating the alert is the same, but this change will help make it easier to understand and manage any issues or a more timely and cost-effective basis. We anticipate the most significant benefits to come from the DCC, and it would therefore be useful if they could quantify these. It is noted that the risk associated with not making this change is that excess volumes of alerts could cause the DCC systems to fail. The benefit to the DCC of making this change would then be the avoided cost of reinforcing their systems, and procuring additional capacity, in order to deal with the volumes of alerts and meets their SLAs. We would expect the benefits accrued by individual SEC Parties to be relatively small compared to the DCC’s avoided costs. Were the DCC not to upgrade their systems to cope with the alert traffic and they were to fail as a result, this would have a significant material on us, especially if occurred at a time that meant that smart meters could not be successfully installed and commissioned.
Western Power Distribution	Networks Party	Yes	If this modification is approved it will result in both system and process changes within our organisation.

Question 2			
Respondent	**Category**	**Response**	**Rationale**
			Initially, in order to know if any alerts are being throttled, we will be required to monitor the SSI dashboard and this will mean a change to internal processes. We will then need to develop our systems so that they can receive and interpret the additional message data. Once the DUIS/XSD change has been implemented, we will need to update our back end systems and processes to handle the new information and respond accordingly.
SSEN	Networks Party	No	As these are handled before being delivered into our adapter, no changes are expected to be made.
E.ON	Large Supplier	Yes	E.ON anticipates changes will need to be implemented to our systems and procedures. However, before we can fully answer this question, we have the following points which we seek further clarification: 1. In Requirement 1 there is reference to an incident being raised where the generic alert threshold of >50 alerts of any type being received from a specific device within a 30 minute period. Which party will that alert be raised against? Is the intention that the alert is raised against the DSP to initiate the device/alert monitoring, or will it be raised against the responsible Supplier to notify them that this threshold has been breached? If raised against the responsible Supplier at this stage, what action are they expected to take? 2. In Requirement 1 there is reference to a second incident being raised when the device/specific alert threshold is breached. Who will this incident be raised against? Is the assumption correct that it would be raised against the KRP that would normally be in receipt of that alert? Please confirm.

Question 2			
Respondent	**Category**	**Response**	**Rationale**
			3. In the Business Requirements document, Requirement 2 – to notify users when alerts have been subject to throttling – may be delivered later than the remaining requirements. E.ON would like to understand an estimated delivery date. 4. If the alerts are throttled then we may lose visibility of patterns in SSI that are useful in diagnosing the source of a problem. The proposal would be much stronger if the monitoring and throttling of these alerts was investigated by the DSP to identify these patterns and root causes proactively, instead of raising an Incident against a Supplier. We will need DSP input to diagnose the issue anyway and any additional information that could be added to the incident ticket would be very helpful. 5. E.ON would like the DCC to provide more detail on how they would ensure the notifications land with the right Supplier contacts and in a way that highlights the relevant priority in a suitable way.
Npower	Large Supplier	Unknown	
Smartest Energy	Small Supplier	No	
Electricity North West	Networks Party	Yes	If the proposal is approved as it stands then each individual User will have to undertake their own analytics and problem identification even though the likely resolution is a change to the device/firmware variant. This is not an efficient use of resource and DCC are ideally placed to provide such analytics centrally, offering a ‘whole system’ view.

Question 3: Will your organisation incur any costs in implementing SECMP0062?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	Any changes to DUIS and changes to alert management would require internal review and cost. Any new management process and root cause analysis would require additional resources internally where required.
EDF Energy	Large Supplier	Yes	We will need to make changes to our working practices regarding the management of alerts and ensure that these are communicated and relevant training undertaken. We do not anticipate the implementation costs of making this change, especially in Stage 1, to be material as the actions that will be taken as a result of receiving filtered alerts should be the same as they would have been for filtered alerts, as the underlying issue causing the alerts to be sent will not have changed. In the event that a DUIS based solution is implemented the costs are likely to be higher – however we would usually incur a relatively fixed cost for upgrading to a new version of the DUIS, irrespective of the number of changes included in that new release. The technical implementation costs that would be associated with making an individual change such as this one is likely to be low.
Western Power Distribution	Networks Party	Yes	The main cost, beside the modification implementation costs, will be developing the systems to accept and handle the additional information within the alerts. It is difficult to determine exactly how much this modification will cost as it will depend what other changes form part of that particular DUIS/XSD release. There will be additional costs beyond the DUIS/XSD change to develop our back ends systems and processes to handle the additional information we are receiving.

Question 3			
Respondent	**Category**	**Response**	**Rationale**
			If we were to implement this change as a standalone change the cost to our organisation would be approximately £20,000. We will not benefit from any cost savings as a result of this modification.
SSEN	Networks Party	Yes	Due to the implementation plan for this, we are unsure of how you will communicate the volumes of supressed alerts. We will still have the desire to understand and report on the number of alerts received into our adapter Vs. the amount generated by a device. This will require extra time to gather and report on this information.
E.ON	Large Supplier	Yes	E.ON expects costs will be incurred but cannot evaluate these costs until more information is provided following testing of the proposed solution.
Npower	Large Supplier	Unknown	
Smartest Energy	Small Supplier	No	
Electricity North West	Networks Party	Yes	Changes to DUIS may be required although offering little or no practical benefit. Analytics will need to be developed to identify issues with particular device variants. Organisational changes to deal with significant volumes of incidents. Estimated £100k.

Question 4: Do you believe that SECMP0062 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	While we agree this better facilitates the General SEC Objectives, discussion is required on the SEC impacts this change brings. Obligations rest purely on a SEC User The current solution and SEC assume that the DCC is responsible for passing all alerts though to the SEC User who is responsible
EDF Energy	Large Supplier	Yes	We agree that this change would better facilitate SEC Objective (a) as reducing the volumes of alerts that need to be processed and managed will enable smart metering systems to be managed more efficiently. We do not agree that this change better facilitates SEC Objective (e) as it is not clear how this change would directly impact energy networks, and certainly not facilitate innovation in the design and operation of energy networks.
Western Power Distribution	Networks Party	Yes	We disagree with the proposer's rationale that this modification better facilitates Objective (a) as it does not impact the Smart Metering Systems at Energy Consumer's premises. This change impacts the DSP systems and northbound to the Users systems. We also disagree with the proposer's rationale that this modification better facilitates Objective (e) as it does not facilitate the innovation in the design and operation of the Energy Networks to deliver a secure and sustainable supply of electricity.

Question 4			
Respondent	**Category**	**Response**	**Rationale**
			We do believe that this modification better facilitates SEC Objective (b) as it will ensure that the DCC can fulfil their obligations by providing some additional protection to part of their system.
SSEN	Networks Party	Yes	We believe that this modification better facilitates general SEC Objectives (a) and (e) for the reasons documented in the SECMP0062 Modification Report
E.ON	Large Supplier	Yes	E.ON agrees with the rational proposed in pages 11 and 12 in the Modification Report.
Npower	Large Supplier	Yes	It will protect the DCC infrastructure from overload
Smartest Energy	Small Supplier	Yes	This modification would better facilitate SEC Objective (a) and (e) as this will help improve the operation of Smart Metering Systems with the use of additional precautions alongside the existing detection program in the DSP. This mod also demonstrates innovation in improving between Service Users and the DCC.
Electricity North West	Networks Party	Yes	We support the intent of the modification proposal however we challenge whether the proposed solution results in efficient operation.

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0062 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	Any DUIS changes would result in impacts and cost, however it is not possible to identify cost at this point until DUIS changes are finalised. Bryt Energy envisages no cost to any Alert Root cause analysis.
EDF Energy	Large Supplier	Yes	Subject to confirmation from the DCC that the benefits that they would accrue as a result of avoiding upgrades to their systems in order to meet their SLAs exceed the costs, we believe that this modification should be approved.
Western Power Distribution	Networks Party	No	We do not believe that this modification will provide an adequate solution to alert volumes and unnecessary traffic, based on what we are currently experiencing. Please see comments in Question 10.
SSEN	Networks Party	No	We feel the costs are acceptable due to the technical changes required to supress alerts. However, we believe the approach needs further work surrounding devices creating permanent alert storms and the email notification solution for impacted parties.
E.ON	Large Supplier	Yes	As per reasons noted above.
Npower	Large Supplier	Yes	
Smartest Energy	Small Supplier	Yes	As a small supplier resource is/can be limited. Where we have received alert storms in testing, it has proven to be time consuming going through the alerts to identify what the alerts are for. It also means where we may spend time trying to resolve an issue, we can potentially miss more important alerts that may have been received alongside other alerts deemed not as important.

Question 5			
Respondent	**Category**	**Response**	**Rationale**
Electricity North West	Networks Party	No	The current proposed solution is too complicated and lacking the overall market intelligence to identify and remediate problematic smart meter models in an efficient manner.

Question 6: If SECMP0062 is approved, should the solution include the email notification in Stage 1 of the implementation approach? DCC have stated this will occur in every incident event if this is included as part of the solution.

Question 6			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	SEC Users should have the option to receive email alerts along with SSI visibility. Email should be managed as per SEC Contacts.
EDF Energy	Large Supplier	No	The likely volume of e-mails is going to be high and just create another problem in managing that traffic. Making the relevant information available via the SSI should be sufficient in Stage 1.
Western Power Distribution	Networks Party	No	We do not feel that the receipt of an email will aid us and will cause additional burden to our resource, especially as there is a likelihood of large volumes.
SSEN	Networks Party	No	Due to the nature of some alert storms, we feel that this could cause administrative issues with the potential volume of emails received.
E.ON	Large Supplier	Yes	E.ON would like to receive email notification in Stage 1 of the implementation approach. Although the incidents will be raised in SSI by default, they may not be picked up immediately if in amongst a much larger volume of incidents already raised by, or against, E.ON. Specific email notification of this type of incident will support quicker review and resolution of the issue. As noted above, we would like the DCC to provide more detail on how they ensure the notifications land with the right Supplier contacts and in a way that highlights the relevant priority in a suitable way.
Npower	Large Supplier	Yes	Email is necessary to notify the user of the alert

Question 6			
Respondent	**Category**	**Response**	**Rationale**
Smartest Energy	Small Supplier	Yes	The solution should include email notification to keep all organisations informed with changes. It also gives the opportunity for the information to be shared/forwarded easily other colleagues at different levels of involvement within Smart Metering and takes away the manual aspect of checking the SSI Dashboard.
Electricity North West	Networks Party	No	Sending emails relating to individual devices is unnecessary and will only create extra complications and cost.

Question 7: How long from the point of approval would your organisation need to implement SECMP0062?

Question 7			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	We no issue with the proposed timelines for implementation for Bryt Energy	This is dependant on DUIS Changes being notified in advance and root cause analysis being undertaken.
EDF Energy	Large Supplier	1 month	We would need a month in order to be able to amend and train out revised working practices in regards to the management of alerts and use of the SSI.
Western Power Distribution	Networks Party	For the full solution including the DUIS change we would require a minimum of six months lead time.	This is due to the XSD change involved. This time scale allows time for planning the works to uplift the systems to the new DUIS version with appropriate regression testing, as well as additional system functionality to be built and full testing to be undertaken.
SSEN	Networks Party	N/A	As the modification will not result in any changes to our internal systems, we will not require a large lead time.

Question 7			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	Clarification is required before an answer can be submitted.	E.ON anticipates changes will need to be implemented to our systems and procedures. However, before we can fully answer this question we require further information (see queries raised in our response to question 2).
Npower	Large Supplier	Unknown	
Smartest Energy	Small Supplier	N/A	N/A
Electricity North West	Networks Party	Dependent upon whether DUIS changes are mandatory then it would require a 6 month lead time.	Sufficient time is required in order to contract for changes with our own service providers in order to design, develop, test and implement.

Question 8: Do you agree with the proposed implementation approach?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	No	At present, we do not know the scope or range of alerts
EDF Energy	Large Supplier	Yes	We agree with the proposed implementation approach.
Western Power Distribution	Networks Party	Yes	We believe that it makes sense to implement a solution sooner rather than later to help protect the DSP systems, with a DUIS change following at an appropriate time.
SSEN	Networks Party	No	We are currently receiving in excess of 100,000 device alerts on a daily basis. With the timeline proposed, this will be implemented after a further increase of alert storm devices being enrolled and the migration of SMETS1 devices which could cause capacity issues with our adapter.
E.ON	Large Supplier	Yes	7 November seems a reasonable date to ensure a positive outcome.
Npower	Large Supplier	Yes	Caveat** the list of exempt needs to be fully agreed by all parties
Smartest Energy	Small Supplier	Yes	A two staged approach means that the solution can be provided with care and due diligence.
Electricity North West	Networks Party	No	Please refer to earlier responses

Question 9: Do you have any Alert Codes that you feel should not be subject to throttling as part of SECMP0062's solution?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
Bryt Energy	Small Supplier	Yes	As per comment 1, until Identification of alert storms of alerts on the proposed alerts not to be subject to "Throttling", in which would circumvent the proposed solution is identified it is difficult to say if any alerts should be exempt. Proposals would be safety, theft, commissioning alerts etc. Root cause analysis needs to be undertaken first to understand what alerts are causing potential issues and if they are genuine or defective. For example, if there are only two types of alerts causing an issue, we would assume at implementation only these two would be throttled and the configuration of any other alerts not throttled. DCC would monitor and add or remove based on actual traffic as new devices and firmware enter the market. In terms of implementation we would also welcome a phased implementation approach to ensure robust of the DCC Solution in the Production environment. Initial implementation would be to throttle an anomalous non-critical alert and to measure the DCC solution is fit for purpose, before throttling an critical alert codes.
EDF Energy	Large Supplier	No	We have not identified any at this time. As noted in our response to question 1 a more detailed set of rules as to what constitutes an excess/duplicate alert will need to be defined to ensure that alerts are not unnecessarily filtered where they relate to multiple re-occurring issues rather than a single ongoing issue.
Western Power Distribution	Networks Party	No	

Question 9			
Respondent	**Category**	**Response**	**Rationale**
SSEN	Networks Party	No	We believe that all codes should be subject to throttling based on the time and volume parameters that are being implemented.
E.ON	Large Supplier	Yes	E.ON believes that there is more insight to be gained by having the raw data and alerts sent with appropriate time stamps. If the alerts are throttled then visibility of patterns that are useful in diagnosing the source of a problem is lost. The proposal would be much stronger if the monitoring and throttling of some alerts was done in partnership with the DSP to identify patterns and thus potential root causes. There is recognition that a pragmatic approach is required though our preferred method is that all data is passed. Any alerts relating to device / supply power loss, removal of covers or batteries (gas meters) should NOT be throttled. The following Alert Codes should not be subject to throttling as they highlight potential or actual Health and Safety events; 0x8F77 Unauthorised Physical Access - Second Terminal Cover Removed 0x8F76 Unauthorised Physical Access - Terminal Cover Removed 0x8F74 Unauthorised Physical Access - Meter Cover Removed 0x8F73 Unauthorised Physical Access - Battery Cover Removed 0x8F3F Unauthorised Physical Access - Tamper Detect 0x8F1F Low Battery Capacity 0x8F1D GSME Power Supply Loss 0x81C0 Supply Disconnect Failure

Question 9			
Respondent	**Category**	**Response**	**Rationale**
Npower	Large Supplier	Yes	These need to be in full agreement of all users
Smartest Energy	Small Supplier	No	All Alert codes should be subject to throttling to help identify common trends that trigger the alert storms. It will also help determine if intervention from specific parties is needed or need to be made aware of. This should help prevent the wrong actions being taken and potentially break systems/meters.
Electricity North West	Networks Party	Yes	Power Outage (AD1), Power restore (8F35 and 8F36) should not be throttled.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	**Category**	**Comments**
Bryt Energy	Small Supplier	None
EDF Energy	Large Supplier	No
Western Power Distribution	Networks Party	Whilst we understand the idea behind this proposal, we are concerned that this solution will not prevent high volumes of unnecessary alerts and does not address the issue as to why devices are generating alerts in such high volumes. We have undertaken a review of 'nuisance' alerts that we are currently receiving, alongside this modification's proposed solution. Currently we are receiving extremely high volumes of two specific alerts, (doubling every month with over 9,000,000 expected for April), however, due to the number of devices generating these alerts, this solution would not actually prevent any of these alerts from coming through to us. We believe that there should be further discussions to fully understand the problem that the DCC are trying to resolve. We don't believe, based on what we are seeing on our systems, that the solution and parameters described in this modification will result in adequate protection.
SSEN	Networks Party	It is disappointing that this implementation approach was favoured above a firmware update approach as discussed in the first working group. Based on the volumes and time periods this will eradicate most alerts we receive, however based on the current level of Power Factor alerts we receive (around 200 every 5 minutes) we will still receive multiple alerts daily. This also prevents us for supporting the implementation of an email notification.

Question 10		
Respondent	**Category**	**Comments**
E.ON	Large Supplier	See above
Npower	Large Supplier	
Smartest Energy	Small Supplier	
Electricity North West	Networks Party	As describe above the modification should focus on identifying root cause issues by evaluating traffic as a whole across device variants. Raising individual device incidents and treating each as a separate issue is neither manageable nor in the best economic interests of customers. Focus should be on the aggregate impact across the DCC system and all Users as a whole.