

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

SECMP0053 ‘Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes’ Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the SECMP0053 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
DCC	DCC	Yes	We agree with the solution and requirement 1, but we would like to see Requirement 2 extended to cover other Service Requests that will not meet the Target Response Times states in the SEC.
Shell Energy	Large Supplier	Yes	As set out by the Proposer
SSEN	Electricity Network Party	No	SSEN are concerned around the alternative solution and the impacts of this increasing the TRT of SR4.8.1 to 24 hours. This will have an impact on our Data Privacy Plan statements provided to OFGEM regarding the duration of storage of unaggregated responses, alongside impacts to business and system processes.
SMS	Other SEC Party	Yes	SMS agrees with the implementation of this solution
TMA Data Management Ltd	Other SEC Party	Yes	We support the change of response time reflecting the criticality of the Service requests.
E.ON	Large Supplier	Yes	E.ON currently uses 6.14.2 during the installation & commissioning process and the proposed changes will reduce any impact of the existing extended response time for that command.
Western Power Distribution	Electricity Network Party	Yes	We agree that the solutions that have been proposed are beneficial for the consumer as it will ensure that devices are configured at the time of installation. Also with regards to SRV4.8.1 it makes sense for the TRT to be realistic, however we question why the other SRVs that the DCC have raised the same concerns around have not been included.
EDF Energy	Large Supplier	Yes	We agree with the proposed solution for Requirement 1.

Question 1			
Respondent	Category	Response	Rationale
			<p>We agree with the proposed solution for Requirement 2, rather than the Alternate solution. It would be preferably to have a TRT that is reflective of actual performance, and which drives the DCC to provide profile data in the quickest time possible. As noted in the consultation, it would need to be ensured that amending the TRT does not mean that the DCC changes their behaviour in terms of the way they retrieve data, only that the TRTs reflect the realistic timescales for receiving large volumes of profile data.</p> <p>For the avoidance of doubt we do not agree that additional SRs other than SR4.8.1 should be included within the scope of the solution for Requirement 2. These additional requirements have been raised very late in the process of refining this Modification Proposal; the progress of this Modification should not be delayed further by late changes to the scope.</p>
SSE	Large Supplier	Yes	<p>We agree with the solutions put forward for Requirement 1.</p> <p>However, we have questions regarding the proposed solution for Requirement 2, given the options set out in the DCC Preliminary Assessment. We believe that further work is required to discuss the options for Requirement 2.</p>

Question 2: Will there be any impact on your organisation to implement SECMP0053?

Question 2			
Respondent	Category	Response	Rationale
DCC	DCC	Yes	<p>From capacity planning analysis, the DSP and DCC have identified a further four Service Requests where we do not believe we can meet the currently defined times of 30 seconds. As part of the Modification where the Proposer is asking to reduce TRTs to allow for speedier install and commission routines, but the DCC are requesting that the times for the following Service Requests be increased correspondingly in to both reduce system load and remove the possibility of DCC being fined for Service Requests that exceed the expected response times.</p> <p>The Service Requests that are impacted are:</p> <ul style="list-style-type: none"> 4.6.1 Retrieve Import Daily Read Log 4.8.2 Read Reactive Import Profile Data 4.8.3 Read Export Profile Data 4.10 Read Network Data <p>Minimal configuration is required to achieve these changes, and the changes to Contracts and Schedules would be small in terms of the change, but significant in terms of reduced liabilities.</p>
Shell Energy	Large Supplier	Yes	Positive. We can deploy auxiliary load installations without risking our Customers.
SSEN	Electricity Network Party	Yes	As stated in question 1, there will be impacts from the alternative solution on our Data Privacy Plan submitted to OFGEM and to system and business processes.
SMS	Other SEC Party	Yes	Commercial contracts with suppliers will need amending.

Question 2			
Respondent	Category	Response	Rationale
TMA Data Management Ltd	Other SEC Party	Yes	
E.ON	Large Supplier	Yes	<p>Requirement 1: This will not have any impact on the organisation and is fully supported by E.ON.</p> <p>Requirement 2: If this can be delivered then it may enable E.ON to avoid some internal effort to change the frequency with which we request half hourly data for SME customers.</p>
Western Power Distribution	Electricity Network Party	Yes	We are a user of SRV 4.8.1 and therefore we will be subjected to the revised TRT and will need to allow for this with internal processes.
EDF Energy	Large Supplier	Yes	<p>We will be impacted should SECMP0053 be approved for implementation.</p> <p>It is not clear whether this change would be implemented as part of a new version of DUIS or not, given that it does not require a change to the formats of the SRs, just to the TRTs.</p> <p>If this were to be part of a new version of DUIS, it is very difficult to isolate and identify the impacts of making any one change as this change will be one of many made as part of a wider SEC Release. We will incur a significant cost for moving to any new version of DUIS, the specific impacts associated with individual changes within any new version is incredibly difficult to identify.</p> <p>Any new version of DUIS will have the following impacts, amongst others:</p> <ul style="list-style-type: none"> • Design build and test changes to our internal systems to comply with the new version of DUIS • Regression testing of the new version of DUIS against current. • E2E testing of the new version of the DUIS in the DCC UIT environment • Transition to the new version of DUIS • Post-implementation support for the new version of DUIS <p>There should be no material difference in the impacts for the different solutions proposed.</p>

Question 2			
Respondent	Category	Response	Rationale
			If the solution does not require a DUIS change then the implementation impacts would be minimal, as this should just require some adjustment of the configuration settings in our systems
SSE	Large Supplier	Yes	There will be changes required to our systems and processes as a result of the changes to the TRT for Service Requests. We would require further impact assessment on our systems once there is further definition and the detailed DCC Impact Assessment is available.

Question 3: Will your organisation incur any costs in implementing SECMP0053?

Question 3			
Respondent	Category	Response	Rationale
DCC	DCC		
Shell Energy	Large Supplier	No	
SSEN	Electricity Network Party	Yes	We are unsure of the costing around changes that will need to be made, however there will not be any cost-savings by this specific SR4.8.1 TRT change.
SMS	Other SEC Party	No	
TMA Data Management Ltd	Other SEC Party	Yes	Low level costs.
E.ON	Large Supplier	No	Not Applicable
Western Power Distribution	Electricity Network Party	Yes	We believe that this modification will only be a minor change within a larger DCC release and therefore our costs for implementing the amended TRT will be minimal. We will not benefit from any cost savings as a result of this modification being approved.
EDF Energy	Large Supplier	Yes	<p>We will incur costs should SECMP0053 be approved for implementation.</p> <p>It is not clear whether this change would be implemented as part of a new version of DUIS or not, given that it does not require a change to the formats of the SRs, just to the TRTs.</p> <p>As noted in our response to question 3 it is very difficult to isolate and identify the cost impacts of making any one change as this change will be one of many made as part of a wider SEC Release. We will incur a significant cost for moving to any new version of DUIS, the specific impacts associated with individual changes within any new version is incredibly difficult to identify.</p>

Question 3			
Respondent	Category	Response	Rationale
			<p>If the solution does not require a DUIS change then the implementation costs would be minimal as this should just require some adjustment of the configuration settings in our systems.</p> <p>There would no difference in implementation cost between the solutions put forward.</p> <p>We would not anticipate making any direct savings as a result of implementing SECMP0053 – however the benefits of making this change relate to the customer experience of smart metering so we would not have expected a cost reduction.</p>
SSE	Large Supplier	Yes	<p>The extent of the costs to be incurred is difficult to ascertain until we receive the confirmed proposed solution.</p> <p>There will be costs related to the impact assessment and any resultant systems updates and process changes to align with resulting DCC TRT for the Service Requests.</p>

Question 4: Do you believe that SECMP0053 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
DCC	DCC		
Shell Energy	Large Supplier	Yes	As stated by proposer
SSEN	Electricity Network Party	Yes	SSEN understand the reasons behind the proposed solution and all other SR amendments seem to have clear reasoning.
SMS	Other SEC Party	Yes	
TMA Data Management Ltd	Other SEC Party	Yes	
E.ON	Large Supplier	Yes	E.ON agrees that delivery Requirement 1 of this change would better facilitate General SEC objective (a) by changing the target response times to enable smart meters to be installed and configured correctly, and to enable smart meters to be installed in premises where this might not currently be possible. Requirement 2 would better facilitate SEC objective (c) by better facilitating energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.
Western Power Distribution	Electricity Network Party	Yes	We believe that this modification better facilitates SEC Objective (a) by aiding the efficient installation and operation of Smart Metering Energy Systems at Consumer's premises.

Question 4			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	SECMP0053 will better facilitate SEC Objective (a) by better enabling smart meters to be installed and configured correctly in consumer premises, and to enable smart meters to be installed in premises where this currently may not be possible.
SSE	Large Supplier	Yes	We believe that SECMP0053 would better facilitate General SEC Objective (a), for the reasons set out in the Modification Report.

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0053 should be approved?

Question 5			
Respondent	Category	Response	Rationale
DCC	DCC		
Shell Energy	Large Supplier	Yes	Essential service requirement.
SSEN	Electricity Network Party	Yes	SSEN understand the rationale behind amending the TRT times.
SMS	Other SEC Party	Yes	
TMA Data Management Ltd	Other SEC Party	Yes	
E.ON	Large Supplier	Yes	E.ON believes that this change should be delivered, although the delivery costs should be reviewed and revised if further analysis determines that Requirement 2 cannot be delivered.
Western Power Distribution	Electricity Network Party	No	Although we believe that this modification better facilitates the SEC Objectives and support the intent, we believe that the solution should include the additional SRVs that the DCC have highlighted have similar constraints to SRV 4.8.1. We also have some concerns with the legal text (see response to Question 9).
EDF Energy	Large Supplier	Yes	We believe that the benefits of implementing SECMP0053, and particularly Requirement 1, far outweigh the costs of making these changes.
SSE	Large Supplier	Yes	We believe that Requirement 1 of SECMP0053 should proceed however we do not agree this for Requirement 2 based on the current position. Given the uncertainties set out in the

Question 5			
Respondent	Category	Response	Rationale
			<p>DCC Preliminary Assessment and potential options, we believe further work and analysis is required to determine the final position for Requirement 2.</p> <p>As noted in our response to Question 10, we would not want the progress of Requirement 1 to be impeded or delayed due to the continuing discussion for Requirement 2 under the same Modification Proposal.</p>

Question 6: If SECMP0053 is approved, which solution do you believe should be implemented?

Question 6			
Respondent	Category	Response	Rationale
DCC	DCC	Proposed Solution	DCC believes the solution as defined in the PIA, included the additional Service Requests for Requirement 2 should be implemented.
Shell Energy	Large Supplier	Proposed Solution	DCC should answer if it can commit to providing 4.8.1 in 5600 seconds for up to 48 HH data from install to end of day of install; and then consistently without issue deliver scheduled daily 4.8.1 for previous 48 HH usage.
SSEN	Electricity Network Party	Proposed Solution	As stated in previous questions in this consultation response, SSEN agree with all other reasoning around the proposed solution
SMS	Other SEC Party	Proposed Solution	
TMA Data Management Ltd	Other SEC Party	Proposed Solution	We support the change from 30s to 5600 seconds for SR 4.8.1
E.ON	Large Supplier	Proposed Solution	E.ON does not wish to propose an alternative solution.
Western Power Distribution	Electricity Network Party	Proposed Solution	We believe that this is the better solution as there is no need for an extended TRT just because all TRTs in the SEC are either 30s or 24 hours. We believe that extending the TRT to 24 hours could result in unnecessary delays in the DCC providing this information. Also, if the other SRVs that the DCC have highlighted (4.61, 4.8., 4.8.3 and 4.10) get the TRTs amended then there will be a precedence for setting appropriate and realistic TRTs for SRVs on an individual basis.

Managed by

Question 6			
Respondent	Category	Response	Rationale
			Also the responses to this SRV will contain personal data that might require aggregation and therefore the TRT should be as short as possible so that aggregation can be completed quickly.
EDF Energy	Large Supplier	Proposed Solution	We agree with the proposed solution for Requirement 2, rather than the Alternate solution. It would be preferably to have a TRT that is reflective of actual performance, and which still drives the DCC to provide profile data in the quickest time possible.
SSE	Large Supplier	Proposed Solution	Either proposal seems reasonable however Proposed Solution (5600 sec) is preferred as SR 4.8.1 is a Read SR and having a delay to receive the response of 24 hours is too lengthy a period, given impact on process and responding to customers. As noted in our responses to Question 5 and 10, there are still discussions to be held on what is covered by Requirement 2 and the options for the proposed solution.

Question 7: How long from the point of approval would your organisation need to implement SECMP0053?

Question 7			
Respondent	Category	Response	Rationale
DCC	DCC	Not applicable	
Shell Energy	Large Supplier	No time	No changes required to use
SSEN	Electricity Network Party	No lead time	No lead time would be necessary if the proposed solution is implemented, if the alternative solution is approved an analysis of the impacts will need to be completed
SMS	Other SEC Party	N/A	
TMA Data Management Ltd	Other SEC Party	3 to 6 months	
E.ON	Large Supplier	TBC	E.ON will implement the changes as part of the larger release implementation, so no specific timescales will be associated with this modification in isolation.
Western Power Distribution	Electricity Network Party	Six months	Due to the system impacts we require a minimum of six months lead time.
EDF Energy	Large Supplier	3 months	As the changes should not require a new version of DUIS we would require a minimal lead time to adjust configuration settings in our systems.
SSE	Large Supplier	To be determined	Difficult to ascertain until we get the exact proposal and understand the extent of scope. We will need to impact assess any updating of our systems and processes to align with the proposed solution(s).

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

Question 8			
Respondent	Category	Response	Rationale
DCC	DCC	No	We believe that the Service Requests mentioned in the response to Question 2 should be implemented in addition to the original requirement. The benefit to DCC would be significant, the opportunity to deliver the SRs in Requirement 1 would be improved, and we do not believe that other system users would be negatively impacted.
Shell Energy	Large Supplier	Yes	Earliest compromised implementation date cause by DCC delay on PA.
SSEN	Electricity Network Party	Yes	SSEN understands the reasons for the date extension
SMS	Other SEC Party	Yes	
TMA Data Management Ltd	Other SEC Party	Yes	We support a July 2020 implementation date.
E.ON	Large Supplier	No	The delivery timescale of 12 months is excessive for what appears to be a relatively small change.
Western Power Distribution	Electricity Network Party	Yes	
EDF Energy	Large Supplier	Yes	We agree with the proposed implementation approach. We would welcome clarity from the DCC as to whether this change would need to be implemented as part of a new version of DUIS or as a standalone change.

Question 8			
Respondent	Category	Response	Rationale
SSE	Large Supplier	Yes	If we have certainty of the proposed solution and scope in the next 2 months, we believe that 25 June 2020 (June 2020 SEC Release) could be deemed reasonable, however this has a dependency – as referred to in our response to Question 7.

Question 9: Do you agree that the legal text will deliver SECMP0053?

Question 9			
Respondent	Category	Response	Rationale
DCC	DCC		
Shell Energy	Large Supplier	Yes	For Requirement 1 either will do, but for Requirement 2 as the report sets out “As part of this assessment, the DCC should explain how they intend to manage these Service Requests and deliver half hourly data as soon as is reasonably practicable so that Users know they won’t be waiting 5600 seconds for each request, instead the time depending on the amount of half hourly data being requested.” We suggest that the DCC provides its proposal for a TRT for returning 48 half hourly consumption values in response to a 4.8.1 for (up to) the previous 24 hour period .
SSEN	Electricity Network Party	Yes	The legal text is clear and unambiguous
SMS	Other SEC Party	Yes	
TMA Data Management Ltd	Other SEC Party	Yes	
E.ON	Large Supplier	Yes	
Western Power Distribution	Electricity Network Party	Yes	In the Solution Design Specification document, on page four it states ‘As part of this assessment, the DCC should explain how they intend to manage these Service Requests and deliver half hourly data as soon as is reasonably practicable so that Users know they won’t be waiting the full 5600 seconds for each request, instead the time depending on the amount of half hourly data being requested.’

Question 9			
Respondent	Category	Response	Rationale
			We believe that this should be included within the legal text as currently it is showing that all SRV 4.8.1 responses, regardless of size have a TRT of 5,600s or 24hrs.
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text.
SSE	Large Supplier	Yes	The legal text seems to meet the proposed and alternative solutions set out in the Modification Report and consultation.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
DCC	DCC	
Shell Energy	Large Supplier	
SSEN	Electricity Network Party	SSEN have an overall concern that this SEC Mod states that it will not impact Network Operators which is incorrect. SR4.8.1 requires very specific system and business processes to handle the request and responses by Network Operators.
SMS	Other SEC Party	
TMA Data Management Ltd	Other SEC Party	
E.ON	Large Supplier	<p>E.ON has the following questions on the Preliminary Impact Assessment (PIA):</p> <p>The PIA Issue MP53-DI1 states that the requirement 2 is not fully elaborated and there is a risk that any further elaboration could significantly increase costs, but there is no mitigating action specified. What does the DCC intend to do to fully elaborate on the requirement so that the impact can be understood, and when with that be completed?</p> <p>The PIA Issue MP53-DW2 states that requirement 2 may never be deliverable at all in a fully operational Smart Metering systems. When does the DCC expect to have a definitive answer to this question and what is the alternative if it can't be delivered?</p>
Western Power Distribution	Electricity Network Party	We are very concerned that the change to this modification has not been cascaded adequately. When SRV 4.8.1 became included within this solution the impacted parties expanded to include Electricity Distributors, Gas Transporters and Other Users (who all have access to this request), however all the documentation and correspondence still states that the impacted parties are Suppliers and the DCC.

Managed by

Question 10		
Respondent	Category	Comments
EDF Energy	Large Supplier	As noted in our response to question 1 we do not agree that additional SRs other than SR4.8.1 should be included within the scope of the solution for Requirement 2. These additional requirements have been raised very late in the process of refining this Modification Proposal; this Modification has already been in progress for over 12 months should not be delayed further by late changes to the scope. Should DCC wish to amend the TRTs for these additional SRs then this should be raised as a separate Modification.
SSE	Large Supplier	Given the options set out in the DCC Preliminary Assessment for Requirement 2, versus the certainty of Requirement 1, we would not want the progress of Requirement 1 to be impeded or delayed due to the continuing discussion for Requirement 2.