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SECMP0011 – Attachment B ‘Working Group Detailed Considerations’

This document contains the detailed discussions of the SECMP0011 Working Group (WG). It highlights the groups consideration, and development, of the proposed solution.

This document also contains the responses to the Working Groups Consultation (including any confidential comments). It also includes the Working Groups responses to those Working Group Consultation responses.

If you would like any further information, or if you have any questions, please don’t hesitate to contact **Samuel Browne** on **020 7090 7755**.

Contents

1.	Solution Development	2
2.	Working Group Consultation Reponses	4
3.	Working Group Membership	30
4.	Terms of Reference	31

1. Solution Development

This section contains a summary of the Working Group’s discussions regarding the development of the SECMP0011 solution and any potential alternative solutions that were considered.

Combining SECMP0004 and SECMP0011

As both SECMP0004 ‘Inclusion of Device Serial Number data item in the Smart Metering Inventory’ and SECMP0011 propose adding a data item into the SMI, Working Group 2 suggested combining these modifications. However, since the modifications were substantially different in terms of validation and reporting it was felt more prudent to keep the changes separate. Equally, the hope was to not delay any DCC Impact Assessment and consultation processes.

MAP ID, MOP ID and MAM ID

The initial scope of this modification suggested adding MAP ID, MOP ID and MAM ID to the SMI. The WG discussed the utility of adding the MOP ID and MAM ID to the SMI. Initially, the WG suggested splitting this modification into two different modifications, one for MAP ID and one for MAM and MOP ID. The DCC noted that the data for MOP ID and MAM ID is not static and therefore maintaining this inventory data item would present significant challenges likely to involve high costs. The WG noted that the MAP ID would be the most useful data item in resolving most disputes over an asset. The Proposer agreed and decided to amend the scope of their proposed solution to remove MAM ID and MOP ID from the modification.

Accessing this information through other means

The WG noted that in the case of Gas MAP ID information already exists in the Supply Point Administration Agreement (SPAA) and is held by Xoserve. Obtaining access to this may be a more efficient way of providing access to MAP ID for MAPs. DCC supported there only being a single version of the data and expressed reservations at two identical data items existing.

Electricity MAPs are currently able to gain access to the MAP ID by requesting reports from ECOES. No such access is available for Gas MAPs. Prior attempts to obtain access to the Gas MAP information through changes to the SPAA have been unsuccessful.

Validation

The WG agreed that the basic validation for the MAP ID would be that its length is between three and four characters for gas and electricity, respectively. There was also an initial discussion that this item would require further validation.

SECAS presented two options to the WG through which DCC could obtain a list of MAP IDs to validate against:

1. Validate against gas and electricity Market Domain Data (MDD), maintained by SPAA and the Balance and Settlement Code (BSC) respectively; or
2. Amend Registration Data to include MAP ID and authorise DCC to use for validation process.

The WG noted that the first option was sufficient. The WG noted that while there is no requirement for MAPs to be registered on the MDD, from a commercial perspective MAPs need to be registered if they operate in the UK market. DCC noted that this solution was technically possible but would require further governance mechanisms to be established.

The DCC Preliminary Assessment did not include the price for validating and noted that adding this requirement would lead to a significant increase from the quote include in the Preliminary Assessment. The WG noted that although there would be downsides of not validating, such as rogue data, the benefits of this requirement may not justify its high cost. It was noted that suppliers would undertake their own validation, using MDD, which would have been the same source of information the DCC may have used to validate the submissions, The Proposer agreed to not progress with this requirement noting that the main focus of SECMP0011 would be to have this data item in the SMI.

Self Service Report

The WG required the creation of a SSI report displaying the Supplier ID, associated with MPxN, for all assets owned by a MAP. The DCC and the WG noted that this report would expose commercially sensitive industry information if this report was available to any User without restrictions. By accessing this report, any User would be able to ascertain where each supplier supplies to. To protect each supplier's commercial interests, the DCC stated that the access to this report would be restricted to certain User Roles. If access to this report were to be restricted to MAPs only, each MAP wishing to access the report would need become DCC Users. The associated complexity of this process would be dependent on the level of controls that would need to be put in place on Users accessing this report. Going through a form of a User Entry Process to access the report would be a significant disincentive to MAPs.

A Working Group Member suggested that to restrict access to this report a new User role be created. DCC noted that this is possible but would be time-consuming because this would require MAPs to go through the User Entry process relating to that new User role.

Following these discussions, the Proposer agreed to withdraw this requirement and pursue the main drive of this modification. Finally, the MAP representatives proposed that the reporting may be accessible as part of an Elective Service with the DCC, which could overcome commercial sensitivity issues and any cost benefit challenges. SECAS noted that this would need to be progressed outside of this Modification Process.

Ofgem's CRS Project

WG members also noted that the closer the implementation date of SECMP0011 gets to the establishment of the Central Registration System (CRS), the less value this modification adds, if approved. The Proposer agreed but noted that the content and timeline of the CRS are yet to be defined and that there is no guarantee that MAP information will be included within the scope of the CRS.

2. Working Group Consultation Reponses

SECMP011 Working Group consultation was issued on 7th November 2016 with responses returned by 28th November 2016.

We received a total of eleven responses (five from large suppliers, three from networks and three from Other SEC Parties) who supported the implementation of this modification. The full responses are provided below:

A majority of the Working Group consultation responses were in line with the views of the Working Group and as a result no formal response is captured below. Where action has been taken in light of the consultation response, this is indicated.

Q1. Is your organisation impacted by this Modification Proposal? If so, please indicate how much lead time your organisation requires to implement it from approval of the change.				
Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party	Yes	As a MAP we are keen for the MAP ID to be stored within the SMI as it will improve the traceability of the assets we own, particularly through the installation, change of supplier and removal processes. There is no lead time to implement as we will not be responsible for the provision or maintenance of this data.	Noted
Scottish and Southern Electricity Networks	Electricity Network	No	From a technical perspective we assume that we are not impacted by this change proposal. This holds true as long as we are not mandated to change our interface with the DCC to manage any issues associated with changes to SRV 8.2 - Read Inventory.	Noted
Electricity North West	Electricity Network	No		Noted
EDF Energy	Large Supplier	Yes	We would be impacted by SECMP0004 – as a Supplier we would be obliged to upgrade to the new version of DUIS and to back-populate the missing values when this new data item is introduced. We would usually require 12 months from the point of approval to be able to implement this sort of change.	Noted

SECCB_11_1904_03-

SECMP0011 – FMR Attachment C

10th April 2017

Version 1.0

Page 4 of 31

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Q1. Is your organisation impacted by this Modification Proposal? If so, please indicate how much lead time your organisation requires to implement it from approval of the change.

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
npower	Large Supplier	Yes	12 months implementation lead time is required.	Noted
Ecotricity	Small Supplier	Yes	We as an organisation will be impacted by this Modification Proposal. However, we are currently not in a position to advise of the full extent of SECMP0011's impact on us as an organisation and of the lead time requirement for the implementation of this modification, as this is dependent on other factors, including its relationship with the terms of our current software licences.	Noted
Western Power Distribution	Electricity Network	No		Noted
Lowri Beck Services	Other SEC Party	Yes	Lowri Beck intends to become a DCC User, under the RSA role, during 2017. We anticipate a lead time of approximately 6 months to make the appropriate changes to systems and processes to support the population of the MAP ID.	Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	Implementing SECMP0011 would require changes to a number of our systems and processes, which would be difficult to introduce into our schedule before February 2018.	Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	Yes	We require 12 months lead time from the approval of the change to implement. This is due to overall levels of industry change, and to ensure we have sufficient time from the availability of the XML Schema to design, build and test our systems.	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 5 of 31

This document has a
Classification of **White**

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WG responses to Q1 comments: Suppliers, Large and Small, agreed that they would be impacted. Suppliers noted that the average implementation time would be 12 months from authority approval. ENPs agreed they would not be impacted while MAPs and RSAs requested 6 months to implement from approval.

Q2. What is the development, capital and operating cost to your organisation, associated with the implementation of SECMP0011?

Party Name	Party Category	Response		
		Amount	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party			
Scottish and Southern Electricity Networks	Electricity Network	£0 – £50,000	Cost assessment is based upon no change being required top our systems that interface with the DCC user gateway and potential changes to SRV 8.2 - Read Inventory (see Q1).	Noted
Electricity North West	Electricity Network			
EDF Energy	Large Supplier			Noted
npower	Large Supplier	+£1,000,000	There will be no benefit to our business	Noted
Ecotricity	Small Supplier	£50,000 - £250,000	With the expected internal changes we would have to facilitate to accommodate this change, we feel that £50,000-£250,000 would be the best estimate for this expenditure.	Noted
Western Power Distribution	Electricity Network			

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 7 of 31

This document has a
Classification of **White**

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Q2. What is the development, capital and operating cost to your organisation, associated with the implementation of SECMP0011?

Party Name	Party Category	Response		
		Amount	Comments	WG Considerations
Lowri Beck Services	Other SEC Party	£0 – £50,000	Includes changes to Service Requests, business processes and testing.	Noted
ScottishPower Energy Retail Ltd.	Large Supplier	£50,000 - £250,000	Would require changes to a number of our systems and processes.	Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	£50,000 - £250,000	This was difficult to assess as we thought there were elements missing to the proposed solution regarding the “backfilling” process. We believe this process would require at least one wash up activity to handle churn during the backfill period, if not more. This has an impact on the overall costs. In addition, volumes and potential exceptions will have implications for the duration of the backfill period, along with the necessary demand management and anomaly detection.	Noted

WG responses to Q2 comments: The implementation and operating costs of SECMP0011 on Parties varied significantly from amongst impacted Parties. Amongst Suppliers, the most impacted Parties, costs of implementing SECMP0011 varied from low (£50,000-£250,000) to high (+£1,000,000). Respondents did note that these figures were only estimates.

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 8 of 31

This document has a
Classification of **White**

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Q3. What is the benefit to your organisation?				
Party Name	Party Category	Response		
		Amount	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party		There is a benefit to all meter asset providers in being able to track assets. This benefit will be delivered to other market participants via lower device rental charges if the risk premium associated with asset loss can be reduced through better asset tracking.	Noted
Scottish and Southern Electricity Networks	Electricity Network	£0 – £50,000	<p>There is no benefit to ED role from this proposed change.</p> <p>Whilst the annual on-going operating costs are deemed to be nil. There will be additional DCC charges levied as part of the ongoing charging regime.</p> <p>We are concerned that the DCC's costs associated with the development of this modification proposal are very high for what appears to be a relatively minor change. We seek assurance that the DCC has provided sufficient detail in their quotation to the working group which ensures that their costs are subject to an appropriate level of scrutiny. If the cost breakdown to the working group is not sufficiently detailed, then the working group must seek further granular information from the DCC.</p>	Noted
Electricity North West	Electricity Network			
EDF Energy	Large Supplier			Noted
npower	Large Supplier	No	We do not believe there will be any industry benefits by implementing mod as this information is already made available within the existing SPAA and MRA arrangements.	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 9 of 31

This document has a
Classification of **White**

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Q3. What is the benefit to your organisation?				
Party Name	Party Category	Response		
		Amount	Comments	WG Considerations
Ecotricity	Small Supplier		<p>We have no comment to provide upon the monetary benefit this shall have on our organisation, but in general, we shall witness a great benefit.</p> <p>We feel that the provision of this detailed and accurate data will provide great benefit in terms of processing disputes and reconciliations, whether that be with the customer, MAP or DNO.</p> <p>This shall benefit the customer, as the accurate tracking of assets shall stop unnecessary charges being raised, which would ultimately be passed through to customers.</p> <p>The benefit can also be witnessed with Firmware. With the Supplier being ultimately responsible for ensuring that the latest version of Firmware is installed, not knowing the MAP's identity will provide great difficulty as the MAP are a vital element of the Firmware process. By making the MAP's identity more readily available and accurate, this should counteract any of the identified Firmware issues and instead assist Suppliers greatly in the Firmware process.</p>	Noted
Western Power Distribution	Electricity Network		We see no benefit to our organisation of this proposed modification.	Noted
Lowri Beck Services	Other SEC Party			Noted
ScottishPower Energy Retail Ltd.	Large Supplier	£50,000 - £250,000	Value of benefit is difficult to estimate with any accuracy at this time, but expect implementation to reduce reporting overheads in future.	Noted

SECCB_11_1904_03-

SECCMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 10 of 31

This document has a
Classification of **White**

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Q3. What is the benefit to your organisation?				
Party Name	Party Category	Response		
		Amount	Comments	WG Considerations
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	£0 – £50,000	<p>We have assessed this proposal and whilst we recognise that there could have been benefits if this was part of the solution from day one, we believe that there are limited benefits to include the MAP ID in the SMI.</p> <p>This is on the basis of:</p> <ul style="list-style-type: none"> • Our processes for Smart are being developed to be suitable for ongoing management without this information being available in the SMI; • We continue to invest and implement processes and systems to support Licence/Code requirements to provide relevant details to MAPs/Suppliers on Change of Supply. 	Noted

WG responses to Q3 comments: MAP Respondents noted that SECMP0011 would benefit the energy industry through increased visibility between MAPs and Suppliers. This better visibility would allow MAPs to charge lower premiums for the rental of their assets.

Q4. Do you agree with the Working Group's views against the SEC Objectives, as noted in Section 6.1 of the consultation document?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party	Yes		Noted
Scottish and Southern Electricity Networks	Electricity Network	Yes	<p>We see the benefits for MAP's but this comes at considerable cost to other user parties in terms of development costs for potentially short term solutions given that future CRS system changes will provide this information in future.</p> <p>The relationship between a MAP and Supplier is a purely commercial one and we are unsure whether all SEC parties should be expected to cover the development cost of change.</p>	Noted
Electricity North West	Electricity Network		<p>We are unsure whether we agree with the Working Group's views against the SEC objectives as we are unable to see any direct use for Meter Asset Provider (MAP) or Meter Operator (MOP) data within the DCC environment.</p> <p>We are also unclear why Suppliers would not use the existing data as mastered in the MPRS system and struggling to see where there is any difference in the change of supplier process between 'smart' and 'non smart' meters in respect of this data</p>	Noted
EDF Energy	Large Supplier	No	<p>We are not clear that this change will better facilitate SEC Objective (a) – as noted above we do not believe that this change delivers clear benefits, and any benefits that are gained only relate to SMETS 2 meters. We believe that this issue could be resolved more effectively either through the existing codes, or via the reforms proposed as part of Ofgem's Switching Programme.</p>	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 12 of 31

This document has a
Classification of **White**

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Q4. Do you agree with the Working Group's views against the SEC Objectives, as noted in Section 6.1 of the consultation document?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
npower	Large Supplier	No	We do not believe there will be any industry benefits by implementing mod as this information is already made available within the existing SPAA and MRA arrangements.	Noted
Ecotricity	Small Supplier	Yes	We agree with the Working Group's views on the SEC Objectives in relation to the implementation of this modification.	Noted
Western Power Distribution	Electricity Network			
Lowri Beck Services	Other SEC Party	Yes		Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes		Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	No	Please refer to our comments and points for clarification in response to Q7. We are unable to concur with the WG views of the SEC Objectives, as we are unsure of the benefits for a MAP on the basis of the information provided in the WG consultation document for the proposed solution.	Noted

SECCB_11_1904_03-

SECCMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 13 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party		Not reviewed	Noted
Scottish and Southern Electricity Networks	Electricity Network			
Electricity North West	Electricity Network	Yes		Noted
EDF Energy	Large Supplier	No	<p>In the main the proposed legal text delivers the intent of SECMP004, however we do have the following comments on the proposed text legal:</p> <ul style="list-style-type: none"> • Definition of MAP – ‘meter asset provider identification number’ does not seem to be appropriate as it is not a number – maybe ‘meter asset provider identification code’ might be better? • In regards to the section on ‘Managing Demand following Modification Proposal Implementation’ it needs to be made clear whether the Service Requests that are sent in order to comply with the SMI Backfilling Requirement need to be included in the SR forecasts that used are obliged to provide by H3.22. If they are not included in the SR forecasts then the impact on reporting (H3.24) and the achievement of DCC SLAs (H3.28) will need to be considered.H3.33 - the User's SMI Backfilling Requirement will 	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 14 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			<p>be sent using the same SRs as are used for BAU transactions – it is not clear how the DCC will be able to relate SRs sent to the Backfilling Requirement. Maybe the legal text should refer to report setting out the outstanding percentage of the User’s original backfilling requirements instead?</p> <ul style="list-style-type: none"> • H3.34 – Does this information need to be on the web-site where is visible to all parties? • Clause 2.6A for Appendix AC – this obligation does not seem to be sufficient as it only requires the MAP ID to be populated when a device is added – it doesn’t require it to be backfilled and this is not mandate elsewhere in the draft legal text. We would suggest that this needs to be amended to show that the MAP ID must be populated for all devices held on the SMI. • DUIS clause 3.8.93.4 – the proposed legal text does not appear to be consistent with the existing legal text in this clause, for example the proposed text refers to EIS but the existing text refers to Import Supplier and Gas Supplier. We would propose the following as an alternative: <p>5) <u>Update MAP ID associated with the Device within the Smart Metering Inventory</u></p>	

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 15 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			<p><u>a. The functionality of the Service Request allows an Eligible User to update the Device's MAP ID.</u></p> <p><u>b. This functionality of the Service Request is available to all the Eligible User Roles associated with this Service Request.</u></p> <p><u>c. Only the User who originally added the Device to the Smart Metering Inventory may update these device details whilst the Device has a status of 'Pending'.</u></p> <p><u>d. This functionality of the Service Request is ONLY available to the Eligible User Roles of Import Supplier and Gas Supplier who are the Responsible Supplier where the device has a status that is not 'Pending'</u></p> <p><u>e. This functionality is only applicable to ESME and GSME Devices.</u></p> <ul style="list-style-type: none"> • DUIS clause 3.8.93.4 will also need to be updated to show that 'This Service Request can be used by Users to perform the following five functions' – it currently refers to four functions. <p>Working Group response to this comment:</p> <p>The Working Group noted the observation on the proposed legal text and has update the legal text provided in Attachment A accordingly.</p>	

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 16 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
npower	Large Supplier	Yes	We agree that the proposed legal text delivers the intentions of SECMP0011.	Noted
Ecotricity	Small Supplier	Yes		Noted
Western Power Distribution	Electricity Network			
Lowri Beck Services	Other SEC Party	Yes		Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes		Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	No	<p>We have reviewed the proposed legal text and have the following comments for review or clarification by the Working Group.</p> <p>As a general comment, the proposed legal text and “backfilling process” does not seem to adequately address consumer churn and is therefore a gap.</p> <p>Based on previous industry retrospective populations in Gas and Electricity for Smart data items, this scenario needs to be accounted for in the proposed approach. We look forward to further information on how churn, with the resultant risk to the population of data, will be addressed.</p>	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 17 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			<ul style="list-style-type: none"> • Section A1.1 Definitions – MAP ID: We are not confident that this is an accurate definition for MAP ID based on the existing data definitions set out under the MRA/BSC and SPAA, with the suggestion that it is an identification number. For example, MRA/BSC – Meter Asset Provider Id is an alias of Market Participant Id [CHAR(4)]. In addition we note the proposed legal text for Table 214 in clause 3.8.91.4 of Appendix AD suggests that meters added prior to implementation of the new schema, will be set as ‘Unknown’ and this does not seem to align with the proposed definition. • In addition, it is not clear from the consultation document on whether this proposed solution will be providing validation by DCC and against which relevant rules/Market Domain Data. • Section H3.29(a): Given customer churn, would Users be able to submit an accurate forecast of volumes? At this point the duration of the “backfilling process” would be unknown, and therefore any such forecast would be subject to variation over time across all suppliers. • Section H3.30: Based on the proposed legal drafting, with these unknowns we are unable to advise if we could realistically commit to the plan. There is no verification with Users to confirm that the SMI Backfilling Target Completion Date is achievable – the proposed legal text is asking Users to commit to obligations without clear expectations on volumes and anticipated duration, or the means to negotiate based on resource and capacity across industry. We seek clarification on what would happen if a User was unable to backfill the requisite amount each day. For example, 	

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 18 of 31

This document has a
Classification of **White**

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Q5. Do you agree that the proposed legal text delivers the intent of SECMP0011?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			would there be an allocation for a further allowance of days or any scope for the plan to become more flexible?	

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 19 of 31

This document has a
Classification of **White**

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Q6. SECMP0011 was initially considered by the Panel to have a material impact on competition and therefore be a Path 2 (Authority-determined) modification. Do you agree that it should continue to be treated as such?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party			
Scottish and Southern Electricity Networks	Electricity Network	Yes		Noted
Electricity North West	Electricity Network	Yes		Noted
EDF Energy	Large Supplier	Yes	We agree that this change has a material impact on competition as a consequence of the impacts that would result from this change being made, and should therefore be a Path 2 (Authority-Determined) modification. We agree that this modification should be treated as an Authority-Determined modification due to the material impact that this would have on competition.	Noted
npower	Large Supplier	Yes		Noted
Ecotricity	Small Supplier	Yes		Noted
Western Power Distribution	Electricity Network			

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 20 of 31

This document has a
Classification of **White**

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Q6. SECMP0011 was initially considered by the Panel to have a material impact on competition and therefore be a Path 2 (Authority-determined) modification. Do you agree that it should continue to be treated as such?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Lowri Beck Services	Other SEC Party	Yes		Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	We believe the costs of the change to be of sufficient materiality, on their own, to warrant Path 2 treatment.	Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	Yes		Noted

Q7. Do you agree that the solution developed by the Working Group best assists Gas Meter Asset Providers with Asset tracking?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party	Yes	MAP access to information through the gas data systems is non-existent meaning that it is extremely difficult to track gas assets. Including the MAP ID in the SMI will significantly improve the ability of a MAP to track the assets it owns. We do not have sufficient information or gas industry knowledge to provide a response to this question.	Noted
Scottish and Southern Electricity Networks	Electricity Network			
Electricity North West	Electricity Network			
EDF Energy	Large Supplier	Yes	We agree that the benefits of making this change largely relate to gas meters, as the communication of MAP information seems to be much more of an issue for gas than for electricity. As noted above we believe that the issue would be better addressed under the current codes rather than via a SEC modification - note that all of the reform options that form part of Ofgem's Design Baseline 1 for their Switching reforms would involve reform of the gas metering arrangements and would make MAP information available via the registration systems, making any change to the DCC systems nugatory.	Noted
npower	Large Supplier	No	We believe a more robust solution would be to extend the existing arrangements under the current SPAA and MRA agreements	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 22 of 31

This document has a
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Q7. Do you agree that the solution developed by the Working Group best assists Gas Meter Asset Providers with Asset tracking?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Ecotricity	Small Supplier	Yes	We agree that the solution will help simplify the aspect of asset management for Gas MAP's and we welcome the alignment of the process between the gas and electricity industries.	Noted
Western Power Distribution	Electricity Network		<p>Whilst the main beneficiaries of the change will be Gas MAPs, it should be recognised that suppliers, particularly smaller suppliers that do not need sophisticated internal asset rental reconciliation systems, could use the MAP id in the SMI to validate rental invoices.</p> <p>We agree that gas MAPs do not have access to the sort of industry data flows that are available to electricity MAPs.</p>	Noted
Lowri Beck Services	Other SEC Party	Yes		Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes		Noted
Smart Meter Assets 1 Limited	Other SEC Party			
Scottish and Southern Electricity	Large Supplier	No	<p>The proposed solution is an option that Gas Meter Asset Providers could utilise if they become an Other User under the SEC. However, the proposed solution does not seem to fully support the benefits set out in the consultation document on the basis that:</p> <ul style="list-style-type: none"> We would expect that suppliers when installing meters will advise their MAPs of the MPxN associated with the device installation. 	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 23 of 31

This document has a
Classification of **White**

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Q7. Do you agree that the solution developed by the Working Group best assists Gas Meter Asset Providers with Asset tracking?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			<p>Therefore the proposal to associate MAP ID with a MPxN in the DCC SMI, would seem to provide a very limited benefit for asset tracking to a MAP. Our understanding is that the role of Other User currently does not have access to the reports listed in the WG consultation document. There does not seem to be a proposal in this consultation to change the access via RBAC – as set out in the SSI Catalogue. These reports are “pertaining to the User” – this seems clear for responsible suppliers or SNAs, how would this be delivered for MAPs operating in an Other User role? Our comments are gathered from what is set out in the consultation itself, therefore it seems that the only possible route suggested for a MAP in the role of Other User would be to Read Inventory by the DCC User Interface. However, this would be on a single device or premises level and therefore how would this data benefit the MAP in their asset tracking?</p> <ul style="list-style-type: none"> • We have difficulty understanding the benefit of knowing the MAP to MPxN on the DCC SMI for the purposes of dispute resolution, where this would seem to be reports using parameterised queries for a specific User portfolio, generally at the premises/device level. We suppose this could enable a supplier to query for MPxN/Device where they may have an invoice from the MAP, however a supplier can already check to determine if they supply the MPxN associated to that device in their registration records, with no need to query the DCC SMI. For the MAP, and taking into account the information provided in 	

SECCB_11_1904_03-

SECCMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 24 of 31

This document has a
Classification of **White**

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Q7. Do you agree that the solution developed by the Working Group best assists Gas Meter Asset Providers with Asset tracking?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			<p>the WG consultation and our previous comment on asset tracking, we are unsure of how the proposed solution would be of quantifiable benefit to a MAP in the Other User role.</p> <ul style="list-style-type: none"> • There are other options that could be considered under the Industry Codes that govern gas arrangements, that would not result in duplication of Supplier costs/activities with the provision of information to the Electricity Meter Asset Providers via this proposal under SEC. 	

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 25 of 31

This document has a
Classification of **White**

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Q8. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Northern Powergrid Metering Limited	Other SEC Party	Yes	<p>Meter Asset Providers are providing the funding for the roll out of smart meters. In order to keep the costs to a minimum the risk premium associated with assets lost during installation, change of supplier or removal must be kept to a minimum. This can be achieved via improved data provision allowing better tracking of smart meters.</p> <p>As a MAP we are fully supportive of this change proposal.</p>	Noted
Scottish and Southern Electricity Networks	Electricity Network	Yes	<p>There appear to be significant synergies between this modification proposal and SECMP0004. If both are approved, we would expect them to be managed and delivered in the same future DCC release so that maximum cost saving synergies can be applied. This is particularly relevant to these two modification proposals since both relate to changes in the SMI and changes to the same service requests.</p>	Noted
Electricity North West	Electricity Network	Yes	<p>It is of our view, that given both this modification proposal and SECMP0004 'Inclusion of industry Device Serial Number within the DCC Smart Metering Inventory' affect the DCC inventory and the same DCC service requests/SSI functions then if both are approved they should be combined as a single delivery in order to realise synergy savings in design, development, test and implementation by the DCC and Users.</p> <p>We are further concerned that changes are being made to the DCC system associated to the industry registrations process ahead of any outcome or decision as to the design of the new central registrations systems and as such the changes may either be incompatible or result in duplicated effort and costs.</p>	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 26 of 31

This document has a
Classification of **White**

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Q8. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			Also, we believe that any changes to the DCC 'Read Inventory' Service Request should be implemented as 'optional' XML attributes so as to allow DCC Users to decide whether to implement changes to their systems or not.	
EDF Energy	Large Supplier	Yes	We are concerned at the indicative cost information that have been provided by the DCC in regards to the changes to their systems – this cost does seem to be disproportionately high for what we would regard as being a low complexity change to the DCC systems. It needs to be ensured that the DCC are challenging their service providers to minimise costs wherever possible – we are concerned that the high costs of making simple changes to the DCC could become a barrier to change, requiring parties to develop sub-optimal process or workarounds as a result.	Noted
npower	Large Supplier	No	We have no further comments to provide.	Noted
Ecotricity	Small Supplier	No		Noted
Western Power Distribution	Electricity Network			
Lowri Beck Services	Other SEC Party	No		Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	We were surprised by the scale of the central costs, which are much higher than we anticipated. Noting the similarities between the solutions for SECMP0004 and SECMP0011, it would be useful to understand whether	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 27 of 31

This document has a
Classification of **White**

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Q8. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
			implementing this proposal in conjunction with SECMP0004 would see a reduction in the costs for both.	
Smart Meter Assets 1 Limited	Other SEC Party		<p>SMA are generally supportive of the intent of the Modification Proposal, as its implementation would result in an improved system for asset tracking, however, we do not believe that it is the best option for resolving the identified issue. It is our belief that the inclusion of the MAP ID within the Central Registration System (“CRS”) database is a more favourable option going forward. Currently CRS is expected to be implemented during 2019. If MAP ID is an included data item within the database, then SECMP0011 will have a limited effective lifespan (max ~23 months). Additionally, the costs associated with SECMP0011 seem extremely inflated. A quotation of £530,000 to £730,000 (excluding testing costs) would appear to be a huge cost for the inclusion of an additional data item, and as yet we have not seen any evidence to justify such cost.</p> <p>Furthermore, it is our understanding that SECMP0011 would only apply to smart meters installed after the implementation date, and as such, there will be no update to the MAP ID on smart meters that have already been installed (including our 400k). Furthermore, dumb meters are not included in the scope of SECMP0011. This diminishes the value of SECMP0011 until a significant amount of meters have been installed after the implementation date.</p> <p>Finally, it should be noted that for SECMP0011 to provide benefit to MAPs, they will be required to become a DCC User. Becoming a DCC User is not possible without incurring the associated costs. Currently it is uncertain if the benefits provided by SECMP0011 are significant enough to warrant the costs of becoming a DCC User.</p>	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 28 of 31

This document has a
Classification of **White**

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Q8. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Considerations
Scottish and Southern Electricity	Large Supplier	Yes	<p>We have set out the points below for further consideration as these do not appear to be covered in the Working Group consultation:</p> <ul style="list-style-type: none"> • Consideration of populating the data when there is a CoS Loss rather than attempting a backfilling process – this could be an alternative that proves more efficient and cost-effective across industry. • Backfilling process would need to have a wash up - with the approach proposed there will be churn within the period of updates and these will need to be covered off by the responsible supplier. • Further analysis should be undertaken to identify the projected volumes by the time this Mod could be implemented, to understand potential duration of the 'backfill' process and provide Users with meaningful information to be able to fully assess the risks and provide a more accurate response in terms of impacts. • We note Option 1 (UNC MOD) assessed by the WG, as this is primarily an issue for Gas MAPs, given the enduring and working solution already in place for Electricity under the MRA. Was there consideration given to the potential for a solution under the governance of SPAA, whereby information could be proposed to be passed from Supplier to Supplier and Supplier to MAP? If there was, we would expect to see the points from this consideration and the potential benefits versus risks. 	Noted

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 29 of 31

This document has a
Classification of **White**

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3. Working Group Membership

During the initial consideration of SECMP0011, the Panel agreed for the modification to be allocated to Working Group 2 during the Refinement Process.

The following table contains a list of the Voting Working Group 2 Members and the Working Group meetings they each attended to discuss SECMP0011.

Working Group Membership and Attendance							
WG Member	Organisation	Meeting 1	Meeting 2	Meeting 3	Meeting 4	Meeting 5	Meeting 6
		1st April 2016	9th May 2016	20th June 2016	20th August 2016	18th October 2016	29th November 2016
Andy Knowles	Utilita Energy	X	X		X	X	
Emslie Law	SSE	X	X	X	X	X	X
Graham J Smith	Scottish Power	X	X				
Graham Wood	British Gas	X					
Jane Franklin	Lowribeck	X	X	X	X	X	X
Paul Saker	EDF	X	X	X	X	X	X
Sam Charlton	EON	X	X	X			
Hugh Mullens	Utility Funding		X	X	X	X	X
Richard Pomroy	WW Utilities		X				
Mark Pitchford	nPower		X	X		X	X
Stuart Haughton	Calvin Capital		X				
Elias Hanna	Landis & Gyr				X		X
Tim Newton	Eon				X	X	X
Attendee Count		7	10	6	7	7	7

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 30 of 31

This document has a
Classification of **White**

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SECMP0011 'Working Group Detailed Considerations'

4. Terms of Reference

To meet the requirements of the Refinement Process set out in SEC Sections D6.8 - D6.14, the Panel agreed a standard Terms of Reference (ToR) and identified supplementary matters for the Working Group to consider in order to fully assess the Modification Proposal.

The below table contains these questions and highlights the subsequent sections in this document where they have been addressed.

Working Group ToR – supplementary matters to consider	
Question	Section(s) of the draft Modification Report
What is the materiality of the issue?	Section 2 (Why Change)
Is the solution proposed in this SECMP0011 more efficient than the current command set?	Section 2 (Why Change)
Are there other deficiencies in the current solution that are addressed by SECMP0011?	Section 2 (Why Change)
What are the detailed changes to the DUIS to support this SECMP0011 (and its Alternative(s))?	Section 3 (Solution)
What are the systems impacts for DCC/User/Smart Meters?	Section 3 (Solution)
What are the costs and lead times to introduce the solution in this SECMP0011 or its Alternative(s)?	Section 4 (Costs and Impacts)
Is the implementation timetable appropriate?	Section 4 (Costs and Impacts)
Are Consumers positively or negatively impacted by the Proposed (or any Alternative) solutions and to what extent?	Section 4 (Costs and Impacts)
What Modification Implementation Testing is required to implement the Proposed Modification, or any Alternative(s)?	Section 3 (Solution)
What are the implementation steps and activities required to implement the Proposed (or an Alternative) Solution(s)?	Section 4 (Costs and Impacts)
Have the views of the relevant Panel Sub-Committee been taken into account?	Section 6 (Case for Change)

SECCB_11_1904_03-

SECMP0011 – FMR
Attachment C

10th April 2017

Version 1.0

Page 31 of 31

This document has a
Classification of **White**

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SECMP0011 'Working Group Detailed Considerations'