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Paper Reference:	**SECP_73_1110_12**
Action:	**For Decision**

SECMP0053 Modification Report

1. Purpose

SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes' has undergone the Refinement Process. We have now completed the assessment of the areas requested by the Panel and prepared the Modification Report. We are recommending that this modification be progressed to the Report Phase and that the Panel approves the Modification Report, the implementation approach, and that SECMP0053 is a Self-Governance Modification.

This paper provides a high-level summary of the key points. Full details can be found in the draft Modification Report in Appendix A.

2. Summary of the proposal

What is the issue?

Target Response Times are the target duration for the round-trip journeys for Service Requests, and are set to either 30 seconds or 24 hours, depending on how time-critical they are. Through development of installation and commissioning processes, it has been identified that some of the Target Response Times set out in SEC Appendix E 'DCC User Interface Services Schedule' are not appropriate.

What is the Proposed Solution?

The Proposed Solution is to amend the Target Response Times set out in Appendix E to ensure that they are fit for purpose. The solution will affect time-critical Service Requests which have Target Response Times set at 24 hours and change them to 30 seconds. These affected Service Requests are 6.14.1, 6.14.2 and 7.9. One other Service Request will be affected, the Target Response Times for Service Request 4.8.1 will be set to 5,600 from 30 seconds, to better reflect the length of time it takes in reality.

3. Proposed progression

We believe that this modification is now ready to progress to the Report Phase.

Determination approach

This Modification Proposal has been previously agreed to proceed under Self-Governance. This is due to the impacts being limited to governance, and aligning the SEC's reporting to what is happening in practice. As no material impacts have since been identified, we believe this Modification Proposal should remain Self-Governance.

Implementation approach

We recommend an implementation date of 25 June 2020 (June 2020 SEC Release) if a decision to approve is received by 13 December 2019.

4. Recommendations

The Panel is requested to:

- **AGREE** that SECMP0053 should be progressed to the Report Phase;
- **APPROVE** the Modification Report;
- **APPROVE** the implementation approach; and
- **AGREE** that SECMP0053 should be progressed as a Self-Governance Modification.

Harry Jones

SECAS Team

4 October 2019

Attachments:

- **Appendix A:** SECMP0053 Modification Report
  - **Annex A:** SECMP0053 business requirements
  - **Annex B:** SECMP0053 legal text
  - **Annex C:** SECMP0053 DCC Impact Assessment
  - **Annex D:** SECMP0053 Refinement Consultation responses

SEC
Smart Energy Code

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Smart Energy Code

SECMP0053

‘Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes’

Modification Report

Version 0.2

About this document

This document is the Modification Report for SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes'. It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

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This document also has four annexes:

- **Annex A** contains the business requirements for the proposed solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the proposed solution.
- **Annex C** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex D** contains the full Refinement Consultation responses.

1. Summary

Target Response Times are the target duration for the round-trip journeys for Service Requests and are set to either 30 seconds or 24 hours, depending on how time-critical they are. Through development of installation and commissioning processes it has been identified that some of the Target Response Times set out in SEC Appendix E 'DCC User Interface Services Schedule' are not appropriate.

The Proposed Solution is to amend the Target Response Times set out in Appendix E to ensure that they are fit for purpose. The solution will affect Service Requests which have Target Response Times set at 24 hours and change them to 30 seconds. These affected Service Requests are 6.14.1, 6.14.2 and 7.9. One other Service Request will be affected, the Target Response Times for Service Request 4.8.1 will be set to 5,600 from 30 seconds. This will help to mitigate the impacts of these changes on the DCC Systems and be a more accurate reflection of how long Service Request 4.8.1 takes in reality.

This modification impacts all Supplier Parties and the DCC. DCC Systems and Party Interfacing Systems will also be impacted by this modification. The total central cost of this modification is approximately £90,000. The proposed implementation date is the June 2020 Release, taking into account the six-month lead time required by the DCC.

2. Background

What are Target Response Times?

During the design of the Smart Metering Implementation Program, the Government Department for Business, Energy and Industrial Strategy (BEIS) led a series of working groups to develop a view of business processes which, amongst other things, ultimately influenced the DCC's Service Provider contracts. Part of this was to set Target Response Times, setting the duration of round-trip journeys for Service Requests (time taken for the request to be sent and the response received). These have been typically set to either 30 seconds or 24 hours, depending on how time-critical they are. These Target Response Times are used to gauge the maximum response time a certain Service request can take, rather than indicating a specific Service Request will always take exactly 30 seconds or 24 hours to return.

The original driver for setting Target Response Times for certain Service Requests to be 30 seconds was that the Service Request in question would need to be processed either as part of the installation and commissioning of a smart meter or to provide instantaneous information or services to a customer.

Through development of installation and commissioning processes it has been identified that some of the Target Response Times set out in SEC Appendix E 'DCC User Interface Services Schedule' are not appropriate.

What is the issue?

The Proposer has further developed their installation and commissioning processes, and through this has identified that some of the Target Response Times set out in SEC Appendix E are not appropriate.

Specific examples of this are the Service Requests to configure Auxiliary Load Control:

- Service Request 6.14.1 'Update Device Configuration (Auxiliary Load Control Description)'; and
- Service Request 6.14.2 'Update Device Configuration (Auxiliary Load Control Scheduler)'.

In many cases these may be required at installation and commissioning to control heating and/or hot water. However, these Service Requests have Target Response Times set to 24 hours, meaning that installers will leave the site without knowing that this critical functionality is configured correctly.

Others such Service Requests may also have inappropriate Target Response Times, depending on how different Users have designed their installation and commissioning processes. Another example identified is Service Request 7.9 'Add Auxiliary Load To Boost Button'.

The Proposer believes that it is critical that the meter is configured in a way that delivers appropriate information and services to the customer. They believe it is not appropriate to install and commission a smart meter without being able to configure critical functionality during that installation visit. Installers should not be leaving site without knowing that the customer's meter is able to provide the services that they require.

Until and unless these changes are made, the Proposer believes that it might not be possible to install smart meters at specific premises given the risk that they may not be able to be configured correctly.

An additional issue this modification looks to address is with some other current Target Response Times not being suitable, which impacts the reporting on performance of the DCC Systems. By amending these identified Target Response Times, this will better align the SEC to the performances which are being achieved through DCC Systems.

3. Solution

Proposed Solution

This modification will amend the Target Response Times set out in SEC Appendix E to ensure that they are fit for purpose. The priority has been reducing the Target Response Times for time critical Service Requests to 30 seconds. This would help to mitigate the impacts of these changes on the DCC Systems and allow for more accurate reporting on the part of the measuring the performance of the DCC Systems.

The Proposer identified three Service Requests that they consider to be time-critical. Their Target Response Times will be changed from 24 hours to 30 seconds:

- SR 6.14.1 'Update Device Configuration (Auxiliary Load Control Description)'
- SR 6.14.2 'Update Device Configuration (Auxiliary Load Control Scheduler)'
- SR 7.9 'Add Auxiliary Load to Boost Button'

One other Service Request's Target Response Time will be amended from 30 seconds to 5,600 seconds, to better reflect the time needed:

- SR 4.8.1 'Read Active Import Profile Data'

The Proposer wishes to make clear that this solution is designed to better reflect the reality of the time Service Requests take for reporting purposes, rather than desiring functional changes to improve the performance of Service Request response times.

The business requirements for the Proposed Solution can be found in Annex A.

Legal text

The changes to the SEC required to deliver the Proposed Solution can be found in Annex B.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
	Other SEC Parties	✓	DCC

Supplier Parties will be positively impacted by receiving a response to Service Requests 6.14.1, 6.14.2 and 7.9 within 30 seconds. This means their staff will receive a response to these while they are on site installing and commissioning meters.

This modification will also affect Network Parties by accurately reflecting the time it will take to expect a return on Service Request 4.8.1. This service request according to an Electricity Network Party respondent requires very specific system business processes to handle the request and responses. Therefore any change to this request's reporting will affect Network Parties.

The DCC will be impacted by having to amend the relevant Target Response Times within their systems.

DCC System

The Communications Service Providers (CSPs) will need to ensure that the affected Service Requests are delivered in line with the new Target Response Times. This will also require changes to the DCC's CSP contracts.

Party Interfacing Systems may be impacted by this modification. Although this modification will not look to change the structure of any Service Requests, business processes may be changed to accommodate the changes to Service Responses.

The full impacts on DCC Systems and the DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex C.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- SEC Appendix E 'DCC User Interface Schedules Specification'

Other industry Codes

There are no changes to other industry codes.

Greenhouse gas emissions

There are no impacts on Greenhouse Gas Emissions.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is £89,087. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	**Cost**
Design	£53,572
Build	
Pre-Integration Testing (PIT)	
Systems Integration Testing (SIT)	£24,579
User Integration Testing (UIT)	£5,426
Implementation to Live	£5,510

The SIT, UIT and Implement to Live costs are for implementing SECMP0053 as a standalone change. These costs would be reduced when implemented alongside other changes, due to efficiency savings. The DCC will provide an assessment of the total costs for the relevant SEC Release once the scope has been confirmed.

There are no operational costs identified.

More information can be found in the DCC Impact Assessment response in Annex C.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

Refinement Consultation respondents stated they would either not incur costs or that any costs would be minimal. The full responses received can be found in Annex D.

6. Implementation approach

Recommended implementation approach

The Working Group is recommending an implementation date of:

- **25 June 2020** (June 2020 SEC Release) if a decision to approve is received on or before 13 December 2019.

The DCC has stated a six-month lead time to implement these changes. The June 2020 SEC Release is therefore the earliest SEC Systems Release that this modification can be included in.

7. Discussions and development

Development of the original solution

The originally proposed solution was designed so that a variety of identified Auxiliary Load related Service Requests could have their Target Response Times revised from 24 hours to 30 seconds so that they could better reflect the time critical nature of the requests. The original three suggested were:

- SR 6.14.1 'Update Device Configuration (Auxiliary Load Control Description)'
- SR 6.14.2 'Update Device Configuration (Auxiliary Load Control Scheduler)'
- SR 7.9 'Add Auxiliary Load to Boost Button'

The DCC asked to include SR 4.8.1 'Read Active Import Data' in the revised Target Response Times so that it could be moved from 30 seconds to a later time. It had been suggested as part of the Working Group discussions that if Target Response Times would be shorted for some Service Requests, others would potentially need to be lengthened to maintain a balance for their targets.

The scope of the modification was subsequently agreed early on to only include these four Service Requests so that it would prevent multiple requests being added to the modification later after the Preliminary Assessment had already been carried out.

A four hour Target Response Time was suggested as a possible option for SR 4.8.1 because it would provide a good middle ground for responses which would take long than 30 seconds to process but could be returned without potentially taking a whole day. Real world examples of where this could be used included where Service Requests were sent at the start of the morning and returned by the end of the business day. It was also suggested that if this element wasn't included in the modification's solution, it would likely be raised in a future modification on the condition there were multiple SEC Parties who would benefit from another Target Response Time if it were created.

The proposed four-hour Target Response Time for SR 4.8.1 was replaced by a 5,600 second time instead during the development of the business requirements. The DCC suggested this would be a more accurate time this Service Request could be returned in. It also believed that the modification's solution should be more focused on the reporting of these time targets rather than incorporating performance related changes.

Discussion of Business Requirement 2

During the Refinement Process, it was initially agreed by the Working Group that two Business Requirements (see Annex A) would form the solution that members requested the DCC to deliver. Requirement 1 was to amend the Target Response Times from 24 hours to 30 seconds for the three Service Requests listed above. Requirement 2 asked the DCC to extend the time from SR 4.8.1 from 30 seconds to 5,600 seconds.

As part of the Preliminary Assessment, the DCC considered that Requirement 2 may be difficult or even impossible to achieve. The Working Group considered whether the Target Response Time for SR 4.8.1 would be better set at 24 hours rather than 5,600 seconds. The DCC subsequently confirmed that any value could be set for a Target Response Time without any impact on the cost for the change. Therefore, the Impact Assessment that was requested would be valid regardless of what the Target Response Time value was set to.

The Working Group consulted on the two options during the Refinement Consultation. Respondents and the Proposer all expressed a preference for 5,600 seconds; the full responses can be found in Annex D. This option was confirmed by the Proposer to be the Modification Proposal's solution.

8. Conclusions

Benefits and drawbacks

The Proposer and the Working Group have identified the following benefits and drawbacks in implementing this modification:

Benefits

- This Modification Proposal's solution will help to ensure that Service Requests with a time critical aspect are answered in a faster time. This will be beneficial for onsite testing of smart metering equipment to assure it's fully operational.
- Without amendments to the Target Response Times, it increases the chance of consumer's smart metering equipment not returning potentially critical Service Requests in a reasonable time. This would work against General SEC Objective (a) which details the efficient operation of smart metering systems at a consumers' premises within Great Britain.

Drawbacks

- The Proposer and the Working Group have not identified any drawbacks with this modification.

Proposer's rationale against the General SEC Objectives

Objective (a)[1]

The Proposer believes that SECMP0053 will better facilitate SEC Objective (a) by better enabling smart meters to be installed and configured correctly and to enable smart meters to be installed in premises where this currently may not be possible.

Working Group members' views

Members of the Working Group believed this modification provides a mutual benefit between Suppliers and the DCC. By amending the Service Requests with longer expected response times concerning onsite testing, this better suits Suppliers. By having the Service Requests used for onsite testing clearly detailed as 30 seconds Target Response Times, Working Group members agreed this would assist in the rollout of Smart Metering Devices. In exchange, extending the expected response time of Service Request 4.8.1 to 5,600 seconds benefits the DCC. Originally, with a response time of 30 seconds, SR 4.8.1 struggles to meet that target required in the SEC, so it made sense to align it with what it can realistically do. The DCC considered that the reality of performance through its systems should be recognised as the basis for reporting.

[1] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

A Working Group member also believed that the modification also fulfils SEC Objective (b)[2] through codifying a more accurate reflection of the SEC that allows the DCC to meet the obligations that it must comply with in its reporting.

Consultation respondents' views

The Refinement Consultation responses agreed with the Proposer that General SEC Objective (a) is better facilitated by this Modification Proposal. One consultation respondent also suggested that General SEC Objective (c)[3] would be better facilitated by providing more accurate reporting over Target Response Times.

The full Refinement Consultation responses can be found in Annex D.

[2] Enable the DCC to comply at all times with the objectives of the DCC and to discharge the other obligations imposed upon it by the DCC License.

[3] Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Appendix 1: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
BEIS	Department of Business, Energy and Industrial Strategy
CSP	Communications Service Provider
DCC	Data and Communications Company
DSP	Data Service Provider
PIT	Pre-Integration Testing
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
UIT	User Integration Testing

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SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes'

Annex A

Business requirements – version 1.0

About this document

This document contains the business requirements for this Modification Proposal. It provides detailed information on the business requirements for the Proposed Solution agreed by the Proposer with input from the Data Communications Company (DCC) and Sub-Committees. It also provides the considerations and assumptions for each business requirement with respect to this Modification Proposal.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	**Requirement**
1	The DCC will change the Target Response Time for Service Requests 6.14.1, 6.14.2 and 7.9 from 24 hours to 30 seconds.
2	The DCC will change the Target Response Time for Service Request 4.8.1 from 30 seconds to 5600 seconds.

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 Requirement 1: The DCC will change the Target Response Time for Service Requests 6.14.1, 6.14.2 and 7.9 from 24 hours to 30 seconds.

The Data and Communications Company (DCC) will change the Target Response Times of the following Service Requests from 24 hours to 30 seconds:

• Service Request 6.14.1 – Auxiliary Load Control

• Service Request 6.14.2 – Auxiliary Load Control

• Service Request 7.9 – Add Auxiliary Load to Boost Button

2.2 Requirement 2: The DCC will change the Target Response Time for Service Request 4.8.1 from 30 seconds to 5600 seconds.

The DCC will implement a 5600 second Target Response Time and use this to replace the existing 30 second Target Response Time for Service Request 4.8.1 – Read Active Import Data.

The DCC have stated that a request to return 13 months' worth of data is technically unfeasible within 30 seconds, so a new Target Response Time is required to provide this information at a faster rate than is currently the case whilst being technically feasible.

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.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
DCC	Data Communications Company
SEC	Smart Energy Code

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SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes'

Annex B

Legal text – version 0.1

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 6.12.

Appendix E 'DCC User Interface Services Schedule'

Amend Service Reference 6.14 as follows:

6.14	6.14.1	Update Device Configuration (Auxiliary Load Control Description)	Import Supplier	~~24 hours~~ 30 seconds		
6.14	6.14.2	Update Device Configuration (Auxiliary Load Control Scheduler)	Import Supplier	~~24 hours~~ 30 seconds		

Amend Service Reference 7.9 as follows:

7.9	7.9	Add Auxiliary Load To Boost Button	Import Supplier	~~24 hours~~ 30 seconds		

Amend Service Reference 4.8, Service Reference Variant 4.8.1 as follows:

4.8	4.8.1	Read Active Import Profile Data	Import Supplier, Gas Supplier, Electricity Distributor, Gas Transporter, Other User	~~30 seconds~~ 5600 seconds		

Data Communications Company

SEC Modification Proposal, SECMP0053

Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes

Full Impact Assessment (FIA), DCC CR 1084

Version:	**0.4**
Date:	**20th September, 2019**
Author:	**DCC**
Classification:	**DCC PUBLIC**

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1 Document Information

1.1 Revision History

Revision Date	Revision Number	Summary of Changes
19/09/2019	0.1	Compilation from Service Providers
		Completed internal DCC Review

1.2 Associated Documents

This document is associated with the following other documents:

#	Title and Originator's Reference	Source	Issue	Version
1	SEC Modification Proposal, SECMP0053 Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes Preliminary Impact Assessment (PIA), DCC CR 1084	DCC CR		1.1
2	SECMP0053 Solution Design Specification	SECAS	11/1/2019	1.0

Any references are shown in this format, [1].

1.3 Document Information

The original Proposer for this Modification was Paul Saker of EDF Energy.

The Preliminary Impact Assessment was requested of DCC in February 2019, after updated requirements were issued by SECAS. An initial version was returned to SECAS on 30th April 2019. That document was updated to reflect the Working Group review, and the Refinement Consultation.

The Full Impact Assessment was requested on the 31st July 2019.

1.4 Document Purpose

The purpose of this DCC Full Impact Assessment (FIA) is to provide the relevant Working Group with the information requested in accordance with SEC Section D6.9 and D6.10.

2 Solution Requirements and Overview

2.1 Context

Target Response Times are the target duration for the round-trip journeys for Service Requests (SRs), and are set to either 30 seconds or 24 hours, depending on how time-critical they are.

Through development of installation and commissioning processes it has been identified that some of the Target Response Times set out in SEC Appendix E are not appropriate. For instance, Service Requests which may be required at the point of installation and commissioning to control heating and/or water are currently set to 'within 24 hours' as a Target Response Time, meaning installers may have to leave their sites without knowing if the critical functionality is configured correctly.

The modification seeks to amend the Target Response Times set out in SEC Appendix E and introduce a new Target Response Time of **5600 seconds** to provide a medium speed Target Response Time for Service Requests.

2.2 Business Requirements

This section sets out the business requirements for SECMP0053, and are taken verbatim from the Solution Design [1].

Requirement 1 – Change the Target Response Time for Service Requests 6.14.1, 6.14.2 and 7.9 from 24 hours to 30 seconds

Change the Target Response Times of the following Service Requests from 24 hours to 30 seconds:

- Service Request 6.14.1 – Auxiliary Load Control
- Service Request 6.14.2 – Auxiliary Load Control
- Service Request 7.9 – Add Auxiliary Load to Boost Button

Requirement 2: The DCC will change the Target Response Time for Service Request 4.8.1 from 30 seconds to 5600 seconds

The DCC will implement a **5600 seconds** Target Response Time and use this to replace the existing 30 second Target Response Time for Service Request 4.8.1 – Read Active Import Data.

The DCC have stated that a request to return 13 months' worth of data is technically unfeasible within 30 seconds, so a new Target Response Time is required to provide this information at a faster rate than is currently the case whilst being technically feasible.

2.3 Requirements Summary

Based on the discussions at the Working Group and the Business Requirements as set out in the Solution Design Document, DCC consider the requirements for SECMP0053 to be **STABLE**.

3 Solution Overview

In the following sections, potential solutions for the requirements are assessed, and their impacts on the system and supporting processes are analysed.

It should be noted that the CSPs were consulted on this Modification, but after discussion and analysis indicated there was no impact on their functionality or systems.

3.1 Requirement 1, DSP Impacts

An initial technical change has been made for Requirement 1 under DCC Internal SCR148. This initial change amended the processing pattern and retry/timeout configuration for the relevant SRs so that they are processed as standard On Demand messages and are not deferred for slower, 24 Hour processing.

The remaining technical change for Requirement 1 is to amend the formal Target Response Times (aka SLAs) for these SRs to be 30 seconds rather than 24 hours. This requires a change to the DSP configuration parameters for Service Level Agreement (SLA) measurement and reporting, with associated changes to DSP Contract Schedule 2.2.

3.2 Requirement 2, DSP Impact

The technical change for this requirement is similar to that for Requirement 1. For SR 4.8.1 - Read Active Import Profile Data, the response timeout will be changed from 30 to 5,600 seconds. The DSP configuration parameters for SLA measurement and reporting will also be changed to 5,600 seconds with associated changes to DSP Contract Schedule 2.2.

4 Impact on Systems, Processes and People

This section describes the impact of SECMP0053 on services and Interfaces that impact Users and/or Parties.

Note Testing and Implementation services and activities are covered in sections 5 and 6.

4.1 Security

There is no impact on the DSP security implementation as a result of this change,

On the basis that there are no changes to infrastructure and no changes to interfaces, it will not be necessary to perform any security testing. No additional Penetration Testing will take place as a result of this change on the basis that:

- there are no material changes to DSP interfaces
- there are no material changes to the security implementation
- there is no new infrastructure being introduced

As a result of the above, there is no requirement to update the Protective Monitoring implementation.

The implementation will be subject to security assurance to ensure contract compliance. Security assurance will validate that contractual obligations in relation to security reviews of the revised functional solution have been completed. No additional requirements for monitoring are expected.

4.2 Infrastructure

Since this change does not require DCC Total System to store any additional data there is no need to increase the storage capacity. The estimates for this change do not include any additional storage costs.

There are no changes to the external interfaces due to this change.

No new infrastructure will be procured in relation to this change.

4.3 Release Approach

Following discussion, this response is based on the possible delivery of SECMP0053 alongside other similar SEC Modification changes as part of a June 2020 release.

Section 6.2 outlines a general plan for the release including when each of the major phases need to commence.

4.4 Request Management

Reference data updates to enforce the revised target response times for the impacted Service Requests will be required.

4.5 Reporting Application Server

Updates to configuration parameters will be required to reflect the revised target response times in SLA reporting.

4.6 Application Support

The Application Management Support team are responsible for the provision of application level support for the DCC Data System application. The limited scope of the change means that no additional application support effort is required.

4.7 Service Management Impact

There will be no changes to reporting obligations as a result of this change, but the SLAs for this set of Service Requests will be changed.

4.8 Impact on Data Processing, Storage and Transmission

This Modification does not materially change or increase interfaces, processing, data storage or data exchange within the DSP, as such the change on its own does not warrant the procurement of additional infrastructure.

Note that the aggregated impact of many such changes to the DSP solution will ultimately result in a reduction of the available processing headroom assumed as part of the original DSP agreement. Separately, there many need to be a change raised for the provision of additional infrastructure should the DCC Total System experience performance problems that are the direct result of such changes.

4.9 Infrastructure Impact

No specific infrastructure requirements or changes have been identified.

4.10 Volumetric Impact

This change does not impact the volume of Service Requests received by DSP.

4.11 Non Functional Impacts

There will be no significant impact on performance because of this change.

There will be no change to the system resilience solution because of this change.

There will be no change to the Disaster Recovery solution or BCDR procedures because of this change.

4.12 Safety Impact

If this change were not implemented then there is a risk that installers may leave consumer premises without knowing if safety related functionality is correctly configured, for example the ability to control or monitor heating. Reduction of the Target Response Times for Critical Service Requests required to be processed during Installation and Commissioning (I&C) provides mitigation for this safety risk.

If this change were implemented incorrectly this could also contribute to safety risks:

- DCC may be unable to process ESME Auxiliary Load Control Service (ALCS) Requests following I&C. The foreseeable DSP hazards associated with ALCS Service Requests have been identified and agreed with the DCC (ref. DSP Hazard Log, DQ.0007).
- DSP fails to meet its SLAs governing Target Response Times that impact the DCC's ability to meet its safety obligations, for example governance of the

safety risks relating to Critical Service Requests required to be processed as part of the device I&C process.

Note the Assumption relating to safety risk assessment in section 9.2.

The DSP Safety Manager will ensure that the safety documentation set has been updated with respect to additional safety considerations in relation to this Modification.

5 Testing Considerations

This section outlines the testing required to complete the Design, Build and Test phases for this SEC Modification.

5.1 DSP Team Resource

To implement the scope of supply described in this Full Impact Assessment, DSP will supply the following testing services:

- Pre-integration team (PIT) activities to align DSP functionality with the solution
- Preparation and Support for Solution Test and User Acceptance Testing
- SIT testing to validate the changed functionality
- SIT support functions including support for issue investigation, resolution and deployment to the SIT environment

5.2 Pre-Integration Testing

During Pre-Integration Testing (PIT), each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. Specifically, the development team will carry out unit testing and the build will be subject to continuous build and automated testing to identify build issues at the earliest opportunity.

PIT will operate as a single phase of activity with a single drop. It will consist of a defined subset of system tests being observed by DCC.

5.3 Systems Integration Testing

It is assumed that the change will be implemented and tested as part of a major release in the SIT-B environment. The SIT team will carry out necessary testing to validate the following aspects of the solution:

- Configuration parameter settings scenarios
- SLA reporting

Effort will be required from the Application Support and Triage teams to support the integration testing. This consists of issue investigation, resolution and deployments to the SIT-B environment.

5.4 User Integration Testing

User Integration Testing (UIT) is referred to as User Testing in the SEC. User Testing of Modification Proposals is provided using the Modification Implementation Testing Service. It enables Users to run specific tests to support their implementation of a change.

There is no perceived requirement for UIT relating to SECMP0053.

6 Implementation Approach and Timescales

6.1 Implementation Approach

Within the SMIP, the Implementation Approach is referred to as Transition to Operations (TTO).

There will need to be some updates to service procedures in advance of the new solution being deployed to the Production system.

This change will be implemented as part of a larger release. The activities required for transition to operations will be minimal following completion of contractual test phases. It is assumed that Operational Acceptance Testing and Business Acceptance Testing may require some support from DSP to validate that updated service procedures have been implemented and take part in some form of service role-playing in advance of go live.

6.2 Change Lead Times

From the date of approval (in accordance with Section D9 of the SEC), to implement the changes proposed DCC requires a lead time of 6 months.

It is assumed that this change is to be implemented as part of a June 2020 release alongside other DSP impacting SEC Modifications. Implementation will need to commence in February 2020 based a set of changes being chosen by SECAS. The high level plan for the release will need to follow the high level timelines in the table below:

Phase	Start	End
SECAS agreement on scope of release	January 2020	
Design, Build, and PIT Phase	February 2020	March 2020
SIT Phase, (limited to functional changes only)	April 2020	April 2020
UIT Phase, (limited to functional changes only)	May 2020	May 2020
Transition to Operations and Go Live	May 2020	June 2020

Table 1: June 2020 Release Timescales

Note that the implementation lifecycle is expected to fit into this schedule. In order to achieve this timescale and implement changes alongside other releases such as SMETS1 it may be necessary to align some activities with those programmes of work. Where required, changes will be implemented using feature switches to enable functionality to be only switched on for testing when it is required.

6.3 Consideration against Other Changes

None currently identified.

7 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification.

7.1 Full Cost Impact

The table below details the cost of delivering the changes and services required to implement this Modification.

Implementation Costs					
Phase	**Design, Build and PIT**	**SIT**	**User Integration Testing**	**Implement to Live**	**Total**
SECMP0053	*£ 53,572*	*£ 24,579*	*£5,426*	*£5,510*	**£ 89,087**

Supplementary Information	
Implementation cost assumptions	Costs are exclusive of VAT and any applicable finance charges Majority of the costs above represent labour costs. Costs provided for Design, Build and Pre-Integration Testing are quotes provided by the Service Providers with specific exclusions of costs as identified above. DCC have reviewed and challenged the costs from the Service Providers to ensure this reflects best price to date.
Explanation of Implementation Phases	DCC's implementation costs are provided by implementation phases. The following describes the purpose of each phase: • Design: The production of detailed System and Service design to deliver all new requirements. • Build: The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented. • Pre-integration Testing: Each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. This is assured by DCC. • System Integration Testing (SIT): All Service Providers' PIT-complete solutions are brought together and tested as DCC's Total Solution, ensuring all Service Provider solutions align and operate as an end to end solution. • User Integration Testing (UIT): Users are provided with an opportunity to run a range of pre-specified tests in relation to the relevant change. • Implementation to Live Costs: The solution is implemented into Production environments and ready for use by Users as part of a live service. This service is subject to implementation costs.

8 Other Impacts

8.1 Impact on DSP Services

The amendment of the Target Response Times for the affected SRs affects the way in which service target achievement in the SLA is determined. The determination of pass or fail against the Target Response Time for each message is calculated and recorded in the Service Audit Trail (SAT) record as it is processed. This is done using the Target Response Times configured for each Service Request.

8.2 Impact on Contracts and Schedules

Contract updates will be required for this change. The detailed updates will be determined as part of the resulting Contract Amendment Note (CAN). This change is expected to affect the following schedules:

- Schedule 6.1
- Schedule 7.1
- Schedule 2.2 will require amendment to support the updated SLAs.

The draft changes for Schedule 2.2 are outlined below.

The current processing time targets for SRV 4.8.1 are as follows.

ID	Service Request	**DCC SM1:** DCC On-Demand Response Time	**DSP SM1.1:** DSP Service Request Time	**CSP SM4.3/4.2:** Round Trip Time 4/3 Test HAN Interface Command Time
4.8.1	Read Active Import Profile Data	30 Seconds	4 Seconds	25 Seconds

The proposed change is:

ID	Service Request	**DCC SM1:** DCC On-Demand Response Time	**DSP SM1.1:** DSP Service Request Time	**CSP SM4.3/4.2:** Round Trip Time 4/3 Test HAN Interface Command Time
4.8.1	Read Active Import Profile Data	5600 Seconds	4 Seconds	5595 Seconds

The DSP Design Authority will facilitate agreement of this change between all Service Providers. For the other impacted SRVs, the proposed values are as follows.

ID	Service Request	**DCC SM1:** DCC On-Demand Response Time	**DSP SM1.1:** DSP Service Request Time	**CSP SM4.3/4.2:** Round Trip Time 4/3 Test HAN Interface Command Time
6.14.1	Update Device Configuration (Auxiliary Load Control Description)	~~24 hours~~ 30 seconds	~~21 hours~~ 4 seconds	~~2 hours~~ 25 seconds
6.15.1	Update Security Credentials (KRP)	~~24 hours~~ 30 seconds	~~21 hours~~ 4 seconds	~~2 hours~~ 25 seconds
7.9	Add Auxiliary Load To Boost Button	~~24 hours~~ 30 seconds	~~21 hours~~ 4 seconds	~~2 hours~~ 25 seconds

9 Risks, Assumptions, Issues, and Dependencies

In the following sections, Risks, Assumptions, Issues, and Dependencies have been identified.

9.1 Risks

Ref.	Area	Description	Impact/Outcome
MP53-RA01	Requirements and Cost	Risk that any elaboration of Requirement 1 or 2 will change them significantly from those currently stated, with a consequent impact on the validity of the ROM price.	Closed

9.2 Assumptions

The assumptions have been considered in the planning for SECMP0053.

Ref.	Description	Accepted?
MP53-AD01	Assume that the change will be implemented and tested as part of a major DCC release, in the SIT-B environment	Accepted
MP53-AD02	There will be no requirement to test this change separately in the UIT environment.	Accepted
MP53-AA03	Assumes that changes to response times might impact the RTT PM4 Calculation	Accepted
MP53-AA04	Any changes will not require a change in Service Request priority.	Accepted
MP53-AA05	Full impact of this change against the current Performance Measures regime will be established in the FIA.	Accepted
MP53-AD06	DSP plans to discharge its safety risk assessment and management responsibilities through update of the Safety Case, and implementation of suitable and sufficient mitigations in its solution to reduce the risks to acceptable levels. DSP expects that suitable and sufficient external mitigations will be implemented by DCC, Service Users and other responsible authorities in line with their legal and licensed safety obligations, to allow for continued safe operation of the DSP solution in its wider energy supply business environment.	
MP53-AD07	This Modification will be part of the June 2020 release.	

9.3 Issues

Ref.	Description	Mitigate?
MP53-DI1	Requirements for Requirement 2 are not fully elaborated	Closed
MP53-DW2	On a fully operating Smart Metering system, it may never be	Closed

	possible to match the requirement stated in Requirement 2	

9.4 Dependencies

Ref.	Dependency	Impact
MP53-DT1	This Modification cannot be progressed to FIA until requirements have been elaborated and confirmed with the Working Group.	Timescales and Cost. Closed

Appendix: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
ALCS	Auxiliary Load Control Service
CAN	Contract Amendment Note
CH	Communications Hub, Comms Hub
CR, CRP, SCR	Change Request, BEIS Change Request, Small Change Request
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
FIA	Full Impact Assessment
I&C	Installation and Commissioning
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
SAT	Service Audit Trail
SEC	Smart Energy Code
SIT	Systems Integration Testing
SMI	Smart Metering Inventory
SMIP	Smart Metering Implementation Programme
SP	Service Provider
SR	Service Request
TRT	Target Response Time
TTO	Transition to Operations
UIT	User Integration Testing

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SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes'

Annex D

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**
			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. 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.
SSE	Large Supplier	Yes	We agree with the solutions put forward for Requirement 1. 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.

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

Question 2			
Respondent	**Category**	**Response**	**Rationale**
DCC	DCC	Yes	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. The Service Requests that are impacted are: 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 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.
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	Requirement 1: This will not have any impact on the organisation and is fully supported by E.ON. 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.
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	We will be impacted should SECMP0053 be approved for implementation. 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. 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 difficulty to identify. Any new version of DUIS will have the following impacts, amongst others: • 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 There should be no material difference in the impacts for the different solutions proposed.

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	We will incur costs should SECMP0053 be approved for implementation. 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. 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 difficulty to identify.

Question 3			
Respondent	**Category**	**Response**	**Rationale**
			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. There would no difference in implementation cost between the solutions put forward. 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.
SSE	Large Supplier	Yes	The extent of the costs to be incurred is difficult to ascertain until we receive the confirmed proposed solution. 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.

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**
			DCC Preliminary Assessment and potential options, we believe further work and analysis is required to determine the final position for Requirement 2. 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.

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.

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	E.ON has the following questions on the Preliminary Impact Assessment (PIA): 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? 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?
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.

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.