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MP080 ‘Managing DUIS uplifts’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP080 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	<p>We agree with the intent of the modification and we also agree with the proposed end date of DCC DUIS V1.1 and V2.0.</p> <p>We are unsure exactly why the TSAT is being removed from the SEC. All new DUIS releases will require a SEC modification to update the SEC Appendix AD and therefore we would expect these modifications to address adding the new version of DUIS to the TSAT as well as end dating any previous versions as appropriate. If it is to be removed we believe that there needs to be very clear governance around who and how this document gets updated.</p>
EDF Energy	Large Supplier	No	<p>We agree with the proposal for DUIS will be added to the TSAT and for each version of DUIS to have a relevant start and end date applied. We also agree that the start and end dates in TSAT will be based upon industry consultation and the most appropriate dates applied on a case by case basis. We also agree that at least two versions of DUIS should be supported at any one time.</p> <p>We strongly disagree with the element of the solution that proposes to remove the TSAT from the SEC and for changes to it to be managed through the TABASC. Changes to the validity period for the DUIS and Devices in TSAT have significant material impacts on SEC Parties, especially where it is proposed that end dates will be introduced which will require Parties to upgrade their devices or their User Systems. Changes of this magnitude and materiality should only be made through the SEC Change process and decided on by SEC</p>

Question 1			
Respondent	Category	Response	Rationale
			<p>Parties through the Change Board (and potentially the Authority), not by TABASC based on industry consultation.</p> <p>We have concerns about how this proposal to remove the TSAT from the SEC has been included in this change as it is outside the original scope of this change raised. It is also not called out clearly in the description of the solution, either in the Modification Report or in the brief description in this form. It is only really evident in the legal text; given the significance of this change we find the failure to call this impact out to SEC Parties very worrying.</p>
Electricity North West Limited	Electricity Network Party	Yes with caveats	<p>The proposed solution will better facilitate SEC objectives a) and g)</p> <p>SEC Objective (a) is better facilitated by improving the provision and operation of smart metering Devices at consumer premises. This is by ensuring that SEC Parties uplift their versions of DUIS to a version that can communicate with both SMETS1 and SMETS2 meters, this will reduce the likelihood of operational issues.</p> <p>SEC Objective (g) is better facilitated by making the implantation of the SEC a more efficient process. With less versions of DUIS to support and test against, this will reduce resources managing older documents and in testing scenarios for Releases.</p> <p>Caveat:</p> <p>As future versions of DUIS could contain unforeseen technical challenges then it is extremely difficult for parties to ascertain any potential impact prior to the respective consultation processes. As the consultation process is based upon a majority verdict then this could mean changes being forced upon parties which conflict with their own operational, technical or commercial constraints.</p> <p>Therefore, there needs to be a derogation process which would allow users to apply to continue using older versions of DUIS for a short duration (albeit maybe not technically fully</p>

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Question 1			
Respondent	Category	Response	Rationale
			<p>supported by DCC) in the event of a significant issue which prevents them moving to the newer version by the required date. Otherwise parties would be effectively barred from using the smart meter service.</p> <p>Our understanding is that the removal of DUIS versions requires no technical or system change and therefore in agreed circumstances it should be possible that older versions could endure longer albeit not expressly supported by DCC.</p>
SSEN	Electricity Network Party	Yes	SSEN agree with the proposed solutions of mandating the uplift to latest DUIS versions (v3.0 and v3.1) for the purposes of SMETS1 functionality. We also agree with moving DUIS to the TSAT.
OVO	Large Supplier	Yes	<p>Yes, however our agreement is subjected to the fact that any end dates for documents within the TSAT will be consulted upon (as stated in A3.34 (b)) and that 'at least 2 versions of DUIS will be supported at any one time'. It is also important that the DUIS start date must not be seen as a firm go live date for Suppliers.</p> <p>We agree with the first part of 'Moving DUIS to the TSAT' - we agree that it'd be easier to find all documents in one place and that it will reduce DCC cost of maintaining multiple versions and in turn reduce the cost for SSE as a SEC Party.</p> <p>We are not sure about the 2nd part 'Mandating uplift to latest DUIS versions (v3.0 and v3.1)' – While we are fine with the two latest DUIS Versions to support SMETS1, we have concerns regarding future DUIS version as changes and industry document are often not available in a timely manner before the DUIS Document is designated. As shown in the table these DUIS version only has 4 months apart.</p> <p>v3.0 28/07/2019 TBC</p> <p>v3.1 28/11/2019 TBC</p>

Question 1			
Respondent	Category	Response	Rationale
			We suggest that apart from Start date and End date the table should also include a date that states when SEC Parties must be on certain version by. Naturally that would tie in with the 'End dates' of the previous versions however this is not clear in the table presented in Page 5.

Question 2: Will there be any impact on your organisation to implement MP080 that you have not already planned for?

Question 2			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	No	
Western Power Distribution	Electricity Network Party	No	We are currently on DUIS V3.0.
EDF Energy	Large Supplier	No	This change should have no impact on our organisation.
Electricity North West Limited	Electricity Network Party	No	It is already our intention to migrate to DUIS v3 within calendar year 2020 so no additional costs will be incurred.
SSEN	Electricity Network Party	No	SSEN are currently in the process of uplifting to DUIS v3.0.
OVO	Large Supplier	No	No. However sufficient time should be given to Supplier to implement the latest DUIS version before the end dates of the last available versions. We would like at least 1 year from the date a new version of DUIS document is published.

Question 3: If your answer to Question 2 is 'yes', will your organisation incur any costs in implementing MP080?

Question 3			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party		
Western Power Distribution	Electricity Network Party	N/A	
EDF Energy	Large Supplier	No	We will not incur any costs as a direct result of MP080.
Electricity North West Limited	Electricity Network Party	No	It is already our intention to migrate to DUIS v3 within calendar year 2020 so no additional costs will be incurred.
SSEN	Electricity Network Party	N/A	
OVO	Large Supplier	No	No, not at the time of the TSAT table designation. However it is understood that cost will be incurred when a new DUIS version is incorporated in our systems

Question 4: Do you believe that MP080 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	Yes	We agree that the intent of Modification 080 would better facilitate SEC Objectives (a) and (g) for the reasons stated in the modification, although we don't agree with the proposed solution.
EDF Energy	Large Supplier	Yes	<p>We agree that this change would better facilitate SEC objective (a) by ensuring that DCC Users are using a version of DUIS that supports the full capability of smart meters in the market and therefore enables all consumers to access those services and ensure interoperability.</p> <p>We agree that this change would better facilitate SEC objective (g) by making it clearer which versions of DUIS are available to Users and for validity periods of DUIS versions to be managed in a transparent way.</p>
Electricity North West Limited	Electricity Network Party	Yes	Please see our response to Q1 above.
SSEN	Electricity Network Party	Yes	SSEN agree that the implementation of MP080 would better facilitate SEC Objectives (a) and (g) as detailed in the modification.
OVO	Large Supplier	Yes	This would bring DUIS in line from a document control perspective with other parts of SEC.

Question 5: Noting the costs and benefits of this modification, do you believe MP080 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	Please see comments under Question 1 regarding the location of the TSAT.
EDF Energy	Large Supplier	No	We would not support the current solution as it proposes to remove the TSAT from the SEC and therefore the scope of the SEC change processes. We do agree with the proposal to include the DUIS in the TSAT and would support this change if the scope were limited to that change.
Electricity North West Limited	Electricity Network Party	Yes	As per earlier responses
SSEN	Electricity Network Party	Yes	Whilst SSEN believe that this Mod should be approved and we agree with the SEC costing detailed. We would like to see a more detailed breakdown of the DCC costs, that result in an amount of "less than 50K".
OVO	Large Supplier	Yes	Yes with conditions. Again, our agreement is subjected to the fact that any end dates for documents within the TSAT will be consulted upon and that 'at least 2 versions of DUIS will be supported at any one time' and that the 'Start date' is not seen as a firm date for Supplier go live.

Question 6: How long from the point of approval would your organisation need to implement MP080?

Question 6			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party		
Western Power Distribution	Electricity Network Party	Minimal	We are happy for this to be approved in line with the planned implementation date.
EDF Energy	Large Supplier	N/A	We would not require any lead time to implement this change.
Electricity North West Limited	Electricity Network Party	We are comfortable with having to implement DUIS v3 by the deadline date of November 2021	
SSEN	Electricity Network Party	N/A	As we are already in the process of uplifting to DUIS V3, no further implementation activities would be required from the implementation of this Mod.
OVO	Large Supplier	N/A	N/A. Again, this change is only documentation change until a DUIS version is end-dated and that we must move on to a new DUIS version.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	Yes	We agree with the proposed implementation date and believe that the proposed end dates of DUIS V1.1 and DUIS V2.0 allow enough time for Users to upgrade to either DUIS V3.0 or DUIS V3.1.
EDF Energy	Large Supplier	Yes	
Electricity North West Limited	Electricity Network Party	Yes	The approach does seem reasonable and will ensure that there are two versions of DUIS being supported at any one time. However, within the Business Requirements Document Ref 2 states ' <i>The end dates for DUIS v1.0 and v2.0 (i.e. when they will stop being supported) will be 26 November 2020</i> '. Shouldn't this be ' 26 November 2021 '?
SSEN	Electricity Network Party	Yes	SSEN agree with the proposed implementation dates for end dating DUIS V1.1 & DUIS V2 and the implementation of DUIS versions and details into the TSAT.
OVO	Large Supplier	Yes	No comment

Question 8: Do you agree that the legal text will deliver MP080?

Question 8			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	<p>We have the following views on the legal with regards to the proposed solution:</p> <ol style="list-style-type: none"> 1) On page three of the Legal Text under section A3.34(b) it states that the amendments are required to be consulted upon and approved by TABASC, however on page 10 of the Modification Report it states that the enduring proposed solution will allow for the SEC Panel (or a delegated Sub-Committee). Therefore we believe that the legal text should state the SEC Panel. This will also align with similar processes elsewhere. 2) The current versions of DUIS according to the SEC are, V1.1, V2.0, V3.0 and V3.1, however the legal text refers to DUIS V1.0. This needs changing to V1.1. <p>However, as raised in previous questions we actually disagree with the proposed solution and therefore disagree with the legal text in its entirety.</p>
EDF Energy	Large Supplier	No	As noted previously we disagree with the element of the legal text that proposes to remove the TSAT from the SEC, this element of the legal drafting changes should be removed.
Electricity North West Limited	Electricity Network Party	Yes	We believe the legal text will deliver the intent of this proposal.
SSEN	Electricity Network Party	No	There seems to be a discrepancy in statements with how the TSAT is managed and maintained.

Question 8			
Respondent	Category	Response	Rationale
			On page 5 of the modification report is it stated that “There will be no rule introduced that requires a set lead time for applying end dates to DUIS versions. The start and end dates in TSAT will be based upon industry consultation and the most appropriate dates applied on a case by case basis.”. However on page 3 of the legal text it states “subject to any such amendments being consulted upon and approved by the Technical Architecture and Business Architecture Sub-Committee”.
OVO	Large Supplier	Yes	We would recommend that regular communication is sent out, as a warning that earlier versions of DUIS will not be supported.

Question 9: Are you a User of DUIS v1.0 or DUIS v2.0 and if so, is the proposed window for uplifting to DUIS v3.0 effective November 2021 appropriate?

Question 9			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	n/a	
Western Power Distribution	Electricity Network Party	N/A	
EDF Energy	Large Supplier	N/A	
Electricity North West Limited	Electricity Network Party	Yes	We are currently a DUIS v1 User intending to migrate to DUIS v3 within calendar year 2020. We agree that the effective date of November 2021 for implementing DUIS v3 is appropriate.
SSEN	Electricity Network Party	Yes	Yes – SSEN agree that the November 2021 is an appropriate date to uplift to DUIS V3
OVO	Large Supplier	No	We are using DUIS 3.

Question 10: If this Modification Proposal is accepted, do you agree with the intent of one DUIS uplift per year as part of the business as usual process?

Question 10			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	n/a	
Western Power Distribution	Electricity Network Party	Yes	We believe that it will be easier to manage one DUIS uplift a year as a business as usual process.
EDF Energy	Large Supplier	Yes	We agree that, as far as practicable, no more than one DUIS uplift per year should be implemented. We would note that the costs of implementing an uplift to a new version of DUIS are very significant, each new version of the DUIS must deliver benefits that are significant enough to justify making such a change – there is no point in making piecemeal changes to the DUIS just because we have an annual release planned.
Electricity North West Limited	Electricity Network Party	Yes	Having one DUIS uplift per year will allow parties to effectively plan for and schedule uplift activities
SSEN	Electricity Network Party	Yes	SSEN support one uplift per year. Once uplifted to DUIS V3.0 which will support SMETS1, we believe that ensuring only one uplift a year is key alongside providing backwards compatibility. This will provide an adequate timeframe for users to manage uplifts to newer DUIS versions in the future.
OVO	Large Supplier	Yes	No comment

Question 11: Please provide any further comments you may have

Question 11		
Respondent	Category	Comments
Calvin Capital	Other SEC Party	
Western Power Distribution	Electricity Network Party	
EDF Energy	Large Supplier	As noted above we are very concerned that the solution proposed, specifically the proposal to remove the TSAT from the SEC, is outside of the scope of this original change and has not been called out sufficiently in the Modification Report. We don't think that this change should have been included in the scope of MP080, and that it should have been much more prominent in the Report.
Electricity North West Limited	Electricity Network Party	No further comments to add.
SSEN	Electricity Network Party	N/A
OVO	Large Supplier	No comment