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MP077 ‘DCC Service Flagging’ Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP077 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	Yes	We agree that the allowable values for the 'DCC Service Flag' data item should be updated to more accurately reflect device statuses to provide clarity and improve information reliability.
Citizens Advice	Consumer Rep	Yes	<p>It is vital for the consumer smart meter experience and the accountability of the rollout that there is a reliable mechanism for identifying smart devices and their operational state at a property.</p> <p>Left unchecked, poor identification of meter status could undermine the impact of reforms to improve reliability of consumer switching.</p> <p>We see examples of suppliers unclear about whether a smart meter is present and operating at a property. This then leads to consumer billing discrepancies and switching problems. We hope this modification will mean fewer consumers suffer from these issues.</p> <p>It could also be important for consumer safety to ensure that DNO's have accurate visibility of a properties metering status.</p> <p>The inaccuracies in the identification of smart devices also needs to be addressed to support more accurate monitoring of the way in which smart metering systems are operating.</p>
Electricity North West Limited	Electricity Network Party	Yes	We believe that simplifying the process, by aligning the Service flags with what is written in the SEC, to allow Users to identify the status of Devices on a Smart Metering System (SMS) should resolve the issue.



Question 1			
Respondent	Category	Response	Rationale
SSEN	Electricity Network Party	No	SSEN are fully supportive of this Mod and agree that the solution needs to be amended, as it is currently not fit for purpose. We would like to understand the solution further as the DCC PIA does not provide an adequate description of the new status' and how these will help us understand the status at a property e.g. The information about how the N – Non-Active status will allow users to know when a device is Decommissioned versus, when a device is Recovered.
Western Power Distribution	Electricity Network Party	No	<p>We believe that the Modification Report Consultation Legal Text and the DCC Preliminary assessment contradict each other.</p> <p>The proposed solution in the consultation includes A, N and I, however the DCC PIA proposes only flag A and N.</p> <p>We believe that the flags required going forward should include:</p> <ul style="list-style-type: none"> • A – Active • N – Not Active • I – Installed Not Commissioned • S – Suspended <p>We believe that business requirements do not actually match what was agreed in the working group discussion as it was agreed that 'I' was required.</p>
EDF	Large Supplier	No	<p>There is a clear misalignment between the solution set out in the Modification Report and the solution detailed in the DCC Preliminary Impact Assessment. The Modification Report explicitly states (in Section 3) that the solution will include a new 'I' (InstalledNotCommissioned) Flag, and this 'I' status is included in the however there is no reference to this in the DCC Preliminary Assessment. The PA does call out that the 'DSP proposed solution does not match exactly the changes described in the Modification</p>

Question 1			
Respondent	Category	Response	Rationale
			<p>requirements' - but it doesn't seem to refer to this requirement and it certainly doesn't align with the description of the solution in the Report. It is not clear whether the DCC is even able to implement the solution defined in the report, and specifically the new 'I' status.</p> <p>It is not really possible to provide a view on whether we agree with the solution as we don't really know what the proposed solution involves and whether it fully addresses the issues that caused his change to be raised in the first place.</p> <p>It is not clear how and when changes to the MRA and the UNC would be progressed in relation to this change, and how any changes to those codes would be able to be progressed in light of Ofgem's Retail Code Consolidation Significant Code Review (SCR). The MRA is not even due to be in existence by the time that this change is due to be implemented (June 2021) and there are currently no planned REC/UNC release being planned for June 2021 on the basis that this is just before the go live date for Ofgem's Switching Programme SCR (currently scheduled for July 2021). Further clarity is required on how any consequential changes would need to be made and under which Codes - and how the implementation of this change will or may be impacted by the ongoing SRs.</p> <p>The technical solution for this change may also need to be considered in light of the changes being delivered by the Switching Programme. Currently registration information is exchanged between the DCC and Registration Data Providers (RDPs), operating on behalf of Network Operators. The flow of data from the RDPs to the DCC systems for access control/charging purposes are will be largely if not entirely replaced by data from the new Centralised Switching Service (CSS). It is not clear whether the data that currently flows from the DCC systems to the current registration systems (MPAS/Xoserve) via the RDPs should still flow via this route, or should instead be sent to the CSS. It would make no sense to retain the RDPs and their associated cost purely to manage updates to the DCC Service Flag. When this change was raised the hope was that this could be delivered quickly and in</p>

Question 1			
Respondent	Category	Response	Rationale
			advance of the Switching Programme changes. As this is no longer the case, consideration should be given to revisiting the overall technical solution to make sure it aligns with the new systems and technical architecture being delivered by the Switching Programme.
SSE	Large Supplier	No	We do not see how the benefits provided justify the cost of the change as it currently stands. We are fully supportive of improving industry data and looking to remove barriers to maintaining it all accurately, but we have implemented processes to overcome these issues and implementing this proposal would incur a cost.

Question 2: Will there be any impact on your organisation to implement MP077?

Question 2			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	No	No impacts to NGN have been identified as a result of this proposal.
Citizens Advice	Consumer Rep	No	
Electricity North West Limited	Electricity Network Party	No	
SSEN	Electricity Network Party	Yes	As there will be new Status' codes implemented as part of the Modification, SSEN will need to make system changes to handle these. At this time, the implementation effort and on-going impacts are unknown.
Western Power Distribution	Electricity Network Party	Yes	As an RDP we will need to update our systems to be able to receive the new flags. These changes are required through the Master Registration Agreement change process due to flags being determined by the valid set within the Data Transfer Catalogue. We might also be required to make changes to our back end systems based on the updated flag statuses that we could receive.
EDF	Large Supplier	Yes	We will need to make changes to your systems be able to receive and process the updated values for the DCC Service Flag. As noted in our response to question 1 we do not believe it is clear what the values will be and what we might do as a result when we receive them as the detail in the Report and in the PA are not the same.
SSE	Large Supplier	No	It looks like the particular dataflow referred to in this consultation is sent by DCC to MPAS, therefore the impact on SSE is minimal. There may need to be some further analysis to ensure our systems can manage the new flags or accommodate the changes that

Question 2																	
Respondent	Category	Response	Rationale														
			<div>DCC/MPAS would have to implement. Should be a very small impact if any though (details of impacted flow below):</div> <div><div><div>Flow Reference: D0350</div><div><div>Flow Reference: D0350</div><div>Flow Version: 001</div><div>Status: Operational</div><div>Flow Name: Notification of DCC Services at Metering Point</div><div>Flow Description: DCC notifies MPAS that it is providing communications services to a metering point and provides any data updates required for MPAS.</div><div>Flow Ownership: MRA</div></div></div><div><table><thead><tr><th>From</th><th>To</th><th>Version</th></tr></thead><tbody><tr><td>DCC</td><td>MPAS</td><td>10.7</td></tr></tbody></table></div><div><div>Item Reference: J1833</div><div><div>Item Name: DCC Service Flag</div><div>Item Ownership: MRA</div><div>Item Description: A DCC provided flag to indicate the status of the services being provided by the DCC to a Metering Point.</div><div>Units: None</div><div>Valid Set: Values are: ('_' indicates a space character for illustrative purposes only and should not be used in the data item)</div></div><div><table><thead><tr><th>Value</th><th>Description</th></tr></thead><tbody><tr><td>A</td><td>Active</td></tr><tr><td>S</td><td>Suspended</td></tr><tr><td>W</td><td>Withdrawn</td></tr></tbody></table></div></div><div><div>Available Actions</div><div><div>Download:  </div><div>DTC Version: 12.7 View</div><div>Version: 12.7</div><div>Version: 12.7 Compare</div></div></div></div>	From	To	Version	DCC	MPAS	10.7	Value	Description	A	Active	S	Suspended	W	Withdrawn
From	To	Version															
DCC	MPAS	10.7															
Value	Description																
A	Active																
S	Suspended																
W	Withdrawn																

Question 3: Will your organisation incur any costs in implementing MP077?

Question 3			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	No	No costs to NGN have been identified as a result of this proposal.
Citizens Advice	Consumer Rep	No	
Electricity North West Limited	Electricity Network Party	No	
SSEN	Electricity Network Party	Yes	As detailed in question 2, Implementation time, costs and effort are currently unknown.
Western Power Distribution	Electricity Network Party	Yes	<p>We are unable to confirm costs at this time due to the proposed solution being unclear and therefore we are unsure exactly what changes will need to be made.</p> <p>We also believe that consideration of the costs involved as part of the MRA (and gas equivalent changes if applicable) changes should be considered as these will form part of the overall implementation costs of the solution.</p>
EDF	Large Supplier	Yes	The direct cost of implementing DCP077 should be low as it should just be an update to the list of valid values for the DCC Service Flag.
SSE	Large Supplier	No	Further analysis would be required to understand what impact this might have on SSE, but we expect there to be an implementation cost.

Question 4: Do you believe that MP077 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	Yes	We agree that updating 'DCC Service Flag' allowable values should more accurately reflect device statuses and therefore further SEC Objective a) to facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain by improving the reliability of information to better help operation of smart metering services.
Citizens Advice	Consumer Rep	Yes	<p>We think that Objective A is met because the modification supports the efficient installation and operation of smart meters through more accurate identification of smart metering systems operation.</p> <p>This modification also supports Objective C because without a supplier providing accurate guidance on the smart capability of their devices it risks consumers assuming they have smart metering and do not need to manually monitor meter readings. This modification should mean suppliers are able to provide consumers with more consistent information on the presence and operating capability of their smart meters.</p>
Electricity North West Limited	Electricity Network Party	Yes	We believe that the improvement in the identification of devices on a Smart Metering System together with their status will better facilitate General SEC Objective (a) 'Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.'
SSEN	Electricity Network Party	No	In its current format, SSEN believe MP077 will not better facilitate General SEC Objective (a) as this will not allow SSEN to understand the actual status of a SMS at a consumer's premise.

Question 4			
Respondent	Category	Response	Rationale
Western Power Distribution	Electricity Network Party	No	We believe, based on all the details provided within the consultation that this modification doesn't better facilitate any of the SEC Objectives and in fact would actually be detrimental to SEC Objectives (a) and (g). We believe that this modification will hinder the efficient operation of Smart Metering Systems and reduce transparency.
EDF	Large Supplier	Yes	Once a clear solution is agreed we believe that MP077 will better facilitate General SEC Objective (a) by ensuring that suppliers are able to understand whether a consumer they are looking to acquire has an active DCC enrolled smart meter as part of the sales/acquisition process, and therefore ensure they offer that consumer appropriate products and tariffs as a result. Making the DCC Service Flag more accurate will also make it more likely that a gaining supplier will be able to operate a smart meter that they gain as the result of a change of supplier as they will have visibility of the capability at an early stage in the switching process.
SSE	Large Supplier	No	Although there are SEC objectives that could be facilitated by this Mod, the fact that we do not support the Mod means we cannot provide a rationale.

Question 5: Noting the costs and benefits of this modification, do you believe MP077 should be approved?

Question 5															
Respondent	Category	Response	Rationale												
Northern Gas Networks	Gas Network Party	Yes	Yes, as the potential improvement in information reliability regarding the ‘DCC Service Flag’ will be of benefit to the industry.												
Citizens Advice	Consumer Rep	Yes	Given the anticipated scale of 45,000 meters impacted and potential risk of not addressing the issue for the rollout and for the future reliability of switching we don’t think the costs are prohibitive at this stage.												
Electricity North West Limited	Electricity Network Party	No	<div>The table showing the breakdown of DCC Implementation costs seems to be incomplete:<table><tr><th colspan="2">Breakdown of DCC implementation costs</th></tr><tr><th>Activity</th><th>Cost</th></tr><tr><td>Design, Build and Pre-Integration Testing (PIT)</td><td>£75,000</td></tr><tr><td>Systems Integration Testing (SIT)</td><td>TBC</td></tr><tr><td>User Integration Testing (UIT)</td><td>TBC</td></tr><tr><td>Implement to Live</td><td>TBC</td></tr></table></div>	Breakdown of DCC implementation costs		Activity	Cost	Design, Build and Pre-Integration Testing (PIT)	£75,000	Systems Integration Testing (SIT)	TBC	User Integration Testing (UIT)	TBC	Implement to Live	TBC
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Implement to Live	TBC														
SSEN	Electricity Network Party	No	Looking at the proposed changes and costs associated, SSEN do not believe that a clear enduring process has been met with the current design approach.												
Western Power Distribution	Electricity Network Party	No	We do not know the costs due to the DCC PIA providing costs for a different solution to that proposed. We also don’t feel that this modification better facilitates the SEC Objectives.												
EDF	Large Supplier	Yes	As the proposer for this modification we continue to believe that there is a problem that needs to be fixed. However there is definitely insufficient clarity on the solution, how it will work in practice and how (and when) it would be implemented to support approval of this change as it stands.												

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Question 5			
Respondent	Category	Response	Rationale
SSE	Large Supplier	No	There would be a cost of implementation and we do not see the benefit.

Question 6: How long from the point of approval would your organisation need to implement MP077?

Question 6			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party		The implementation date should take into consideration any system or file format changes required by parties who receive or send files which contain the 'DCC Service Flag' data item.
Citizens Advice	Consumer Rep		
Electricity North West Limited	Electricity Network Party	6 months minimum	To ensure relevant processes and procedures have been reviewed/updated.
SSEN	Electricity Network Party	N/A	At this time due to the requirement to create, amend and test the necessary changes. SSEN is unsure of the time required to implement the changes.
Western Power Distribution	Electricity Network Party	Unknown	This modification requires a change to our MPRS systems and we are unable to advise what lead time is required until the MRA Change is raised. This is because without the MRA change proposal we do not know exactly what the requirements will be.
EDF	Large Supplier	6 months	This is really driven by the lead time for the consequential changes required to the MRA and UNC - any change to the valid values for a data item would usually require a six month lead time.
SSE	Large Supplier	No comment	Unknown - further analysis is required.

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

Question 7			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	Yes	This proposal could be implemented in the June 2021 Major SEC Release.
Citizens Advice	Consumer Rep	Yes	We think this solution should be implemented as soon as possible
Electricity North West Limited	Electricity Network Party	Yes	We are comfortable with the proposed approach for implementation in Jun-21.
SSEN	Electricity Network Party	No	SSEN would like to understand the timeframes required by other impacted industry parties E.g. MRA, to understand if this timeframe is realistic.
Western Power Distribution	Electricity Network Party	No	<p>We have raised our concerns regarding the associated change required under the MRA (and gas equivalent changes if applicable), however this is not mentioned within this consultation.</p> <p>We feel that there will not be a need to batch the 'N' flag updates as the volumes will not exceed what the systems are capable of, and this is because we feel that 'S' should be included for suspended and these could be triggered in mass volumes.</p> <p>In order to implement the proposed changes there will be changes required to MPRS and presently, due to faster switching, there is a change freeze in place.</p> <p>We are also concerned that it appears that there has been no consideration to the SCR and the fact that it is possible that the implementation of these changes might be impacted by the faster switching programme.</p>
EDF	Large Supplier	No	As noted above in our response to question 1 we do not believe that it will be possible to implement this change as part of the June 2021 release.

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Question 7			
Respondent	Category	Response	Rationale
SSE	Large Supplier	No comment	No comment

Question 8: Do you agree that the legal text will deliver MP077?

Question 8			
Respondent	Category	Response	Rationale
Northern Gas Networks	Gas Network Party	Yes	We believe the legal text provided should deliver the Solution set out in the modification.
Citizens Advice	Consumer Rep		
Electricity North West Limited	Electricity Network Party	Yes	We believe the legal text will deliver the intent of this modification.
SSEN	Electricity Network Party	No	The implementation of 3 status' in the legal text do not provide enough information to deliver requirement 1: "Implement a method of understanding if there is a Device currently at a premises"
Western Power Distribution	Electricity Network Party	Yes	We agree that the changes in the legal text match the proposed change in the modification.
EDF	Large Supplier	Yes	As already noted the legal text aligns with the solution defined in the Report but not with the solution defined in the PA – it is not clear which of these is actually proposed to be implemented.
SSE	Large Supplier	No comment	No comment

Question 9: Please provide any further comments you may have

Question 9		
Respondent	Category	Comments
Northern Gas Networks	Gas Network Party	Receivers or senders of data flows, e.g. CDSP, that incorporate the DCC service flag values should be kept informed of the progress of this modification. In order to allow for their own systems updates to be aligned they should be consulted, as early as possible, with reference to timelines. This way the industry can minimise disruption and failures of file flows.
Citizens Advice	Consumer Rep	
Electricity North West Limited	Electricity Network Party	Our understanding is that other DCC-MPAS interfaces are to be replaced by new messages under Ofgem's Switching Programme so shouldn't the implementation of this change be through that Programme to make it more efficient for all parties in the long term. Wont the continued use of the D0350 dataflow result in RDP interface costs still being incurred?
SSEN	Electricity Network Party	N/A
Western Power Distribution	Electricity Network Party	<p>We are very concerned that the DCC PIA does not actually meet the business requirements that were agreed in the working group. We feel that the business requirements should have matched what was discussed in the working group and a PIA requested for these requirements, and then the DSP could propose an alternative solution (only including a new 'N' flag) with justification as to why they believe that this is the better option. The working group can then discuss which option is the best solution for industry.</p> <p>As mentioned previously we are also concerned that appropriate attention to the cross code requirements and SCR have not been considered.</p> <p>We would also like to see the 'S' flag remain. We need to be able to identify whether there is a DCC Smart Meter physically on site as well as whether or not we can communicate with it. If suspended devices are included with either the 'N' or the 'A' status will result in misleading data.</p>

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Question 9		
Respondent	Category	Comments
		<p>Page 10 of the DCC PIA states ' A SMS is said to be 'Decommissioned' if it is removed from the wall', however we believe that there might be situations where a device is decommissioned but is still in situ, for example if a customer wishes to opt out of having smart services.</p> <p>We are concerned about the first paragraph of Section 3.1.2 of the DCC PIA due to the fact that there are currently multiple devices associated to a single MPxN in error. With these anomalies within the SMI we believe that there will be confusion with regards to the correct status to set.</p> <p>On page 11 of the DCC PIA it states 'Two DSP feature switches will be introduced to enable the new functionality, one for Gas and one for Electricity at the appropriate point for each. It is assumed that the new functionality will be enabled only when all RDPs for a given fuel type are in a position to receive the new DCC Service Status, i.e. there will be no need for DSP to enable the new feature for electricity on a per RDP basis, since with more than 20 electricity RDPs that would make the solution more complex.' We question this as RDPs will be forced to implement under a Big Bang approach with the MRA (and gas equivalent changes if applicable) changes.</p>
EDF	Large Supplier	
SSE	Large Supplier	No comment