SECMP0067 'Service Request Traffic Management'

Modification Report Consultation responses

About this document

This document contains the full non-confidential collated responses received to the SECMP0067 Modification Report Consultation.

Summary of responses
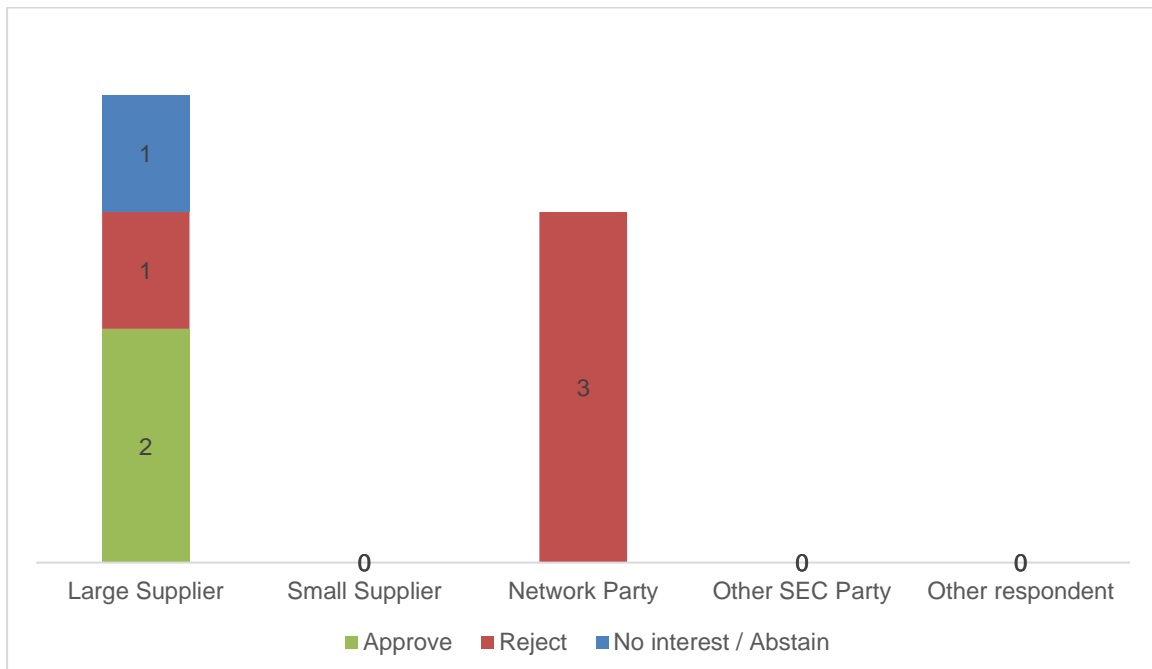
Question 1: Do you believe that MP0067 should be approved?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Electricity Network Party	Reject	We don't agree that this modification would better facilitate SEC Objective (a) by ensuring an efficient operation of Smart Metering Systems as we don't feel that it fully addresses the problem. We disagree that this modification better facilitates SEC Objective (e) as we do not feel that it facilitates Network Operators in innovating the design and operation of their networks to ensure a secure and sustainable supply of energy, especially as Network Operators cannot send SRVs that control the supply to a premise.
Centrica	Large Supplier	Approve	We are supportive of the implementation of modification proposal 0067. Implementation should put in place the necessary protection for Users from malicious or unplanned events within other Users' systems. We agree with the proposer, and the working group, in that implementation of this modification will further achievement of the first General SEC Objective (a). Implementation of the solution will protect the DCC System in times of high demand (or attack) and therefore reduce the likelihood of a DCC System outage leading to a denial of service for all Users.
E.ON	Large Supplier	Abstain	Whilst we understand the need to protect the DCC systems from widespread disruption and down time that affects all service users, it is unclear considering the imminent alert traffic management solution and recently delivered additional capacity whether the DCC is in imminent danger of exceeding capacity due to service request traffic.

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Question 1			
Respondent	**Category**	**Response**	**Rationale**
Scottish Power	Large Supplier	Reject	We are not minded to support this Modification Proposal for the following reasons: • Firstly, we do not believe the benefits case took proper account of the likelihood of this functionality ever being needed; however, with other initiatives already seeking to reduce levels of extraneous network traffic, it would seem that likelihood is reducing all the time. Therefore, given the timescales to deliver the proposed solution, we do not believe the case is made for SECMP0067. • We do not believe that the total costs have been surfaced. Moreover, we think that the costs in the round are likely to outweigh the benefits of SECMP0067. Although the Modification report recognises the expectation that most, if not all, Users will face costs from implementing these proposals, it seems no actual values were elicited during the consultation process. Nevertheless, we feel certain that an aggregate of these costs will at least match, if not exceed, the central costs of delivering the solution. • For our own part, the system changes are quite significant and will take c.12 months to deliver. Given the above, we do not believe the Change Board should offer its support to these proposals at this time.
SSEN	Electricity Network Party	Reject	As per our previous consultation response, SSEN fully support this SEC Mod, however further detail is required before we believe this can be approved. We need to understand the current capacity levels and how often this new functionality would potentially be required/invoked. The documentation only references one previous scenario but does not mention traffic that was generated during the period to understand the impact this mechanism will have. This would allow us to understand if this is the best solution to address the issue noting the costs and benefits.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			In previous working groups the suggestion of extra motorways being introduced, among other ideas, as an alternative to the proposed solution had been highlighted. This has been noted in the documentation but with no reference made to the number of future incidents this should help avoid based on each additional motorway lane added. Noting the increase in system usage in the Service Request Traffic Management document, this is required to understand the impacts.
			We would also like to question the absence of a Priority Service Request list. As a DNO we are unable to forecast unplanned faults on the network, this can result in specific spikes in SRV demand. With the removal of the Priority Service Request list previously discussed in working groups, we would like to understand the impacts this may have during LV and HV faults.
			We agree that it is not feasible or economically viable to provide a System with infinite capacity. Noting proposed costs, we would like to ensure full analysis confirms that this mechanism is the most suitable solution and would best deliver SEC objectives (a) and (e), as per the SECMP0067 consultation.
Electricity North West Limited	Electricity Network Party	Reject	While we acknowledge the need for DCC to protect the service for all users we do have significant concerns that this will impact our ability to use SR7.4 Read Supply Status in response to significant electricity network faults. These requests are time critical, if we cannot get a response within a few minutes then the benefits of being able to confirm resumption of supply are lost. The inability to use or rely on this service request further diminishes benefits realisation for DNO's. If many suppliers are using 'heavy' service requests such as reading consumption data at the same time, then this significantly increases the likelihood of us being subject to traffic management while dealing with a major network incident (e.g. storm).

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			The implementation of this change will also have a significant impact on how our smart meter systems will need to operate when under traffic management and therefore an implementation date of November 2020 does not give us enough time to adequately prepare.
Utilita	Large Supplier	Approve	Utilita approves of MP0067 to facilitate the efficient operation of smart metering systems at energy consumers' premises in accordance with SEC objective A. We believe this solution, out of the many proposed, most cares for our most vulnerable customers' needs as it protects the DCC System in times of high demand, reducing the likelihood of a DCC outage leading to delays in PPM top ups

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Question 2: Please provide any further comments you may have

Question 2		
Respondent	**Category**	**Comments**
Western Power Distribution	Electricity Network Party	We seek clarification with regards to the mechanism document. We were of the opinion that there was one singular document called the 'Traffic Management Mechanism Document' that would detail both the mechanism under this SEC Modification and that under SECMP0062, however throughout the legal text, this modification refers to the 'Service Request Traffic Management Mechanism Document' suggesting that these are actually two different documents. If this is the case then 'Service Request Traffic Management Mechanism Document' will need to be defined somewhere in the SEC. If this is not the case then the legal text needs amending to state 'Traffic Management Mechanism Document.
		As the mechanism document is still only providing illustrative figures it is hard to understand exactly what the impact will be on us as a User and what our thresholds will be.
		We also have concerns about the volume of meters that the DCC will use due to the inaccuracy of the Smart Metering Inventory. The statement in the TMMD is: 'The first weighting factor is the number of smart meters that the Service User is responsible for, sourced from the Smart Metering Inventory', however this is not clear. Does this include pending/whitelisted/installed not commissioned/ devices? If it does how does this work with Network Operator meter volumes as they are not associated to a device until a bit later in the process?
		We are still unclear whether all other options have been fully investigated to justify the costs associated with this change, i.e. ADTs, additional motorways etc.

Question 2		
Respondent	**Category**	**Comments**
		As a result of these queries and the cost associated with this change we are unable to support it at this present time.
Centrica	Large Supplier	Ahead of the Change Board consideration, we would request that the following matters are answered or dealt with:
		1) The dead band period appears to be defined in the Service Request Traffic Management document, however, the values are 'example' only and it is not clear how, or when, these will be determined? Once defined, will these configurable values fall under the general document governance (e.g. consultation and Panel approval) or by another process (e.g. DCC determined)?
		2) Clarification is requested on whether there is a dispute or appeal process if a User disagrees with the DCC's determined Service User Allocation?
		3) The working group's concerns on the implementation costs for the modification were dealt with by DCC providing the information in the "Why is this the best solution?" section of the modification report. Despite this additional information, we do not understand the explanation – can DCC provide greater clarity (e.g. a better explanation of the different profiles)?
		4) It is not clear from the modification report whether the capacity used by Scheduled SRVs will be included in the report to SEC Panel? Scheduled SRVs capacity is not included in the report examples in annex C. This is important as DSP must do everything it can to ensure Users have the most capacity available during peak usage periods, if they are not managing scheduled reads etc (with a 24-hour target response time) then they have failed, not the DCC Users.
		5) There are several values within the modification report that are still within square brackets – what is the status of these values, still to be determined or are the square brackets no longer required?
E.ON	Large Supplier	With regard to the decision to remove all SRs from the priority SR list at go live, E.ON agrees that this is correct approach to achieve the objectives of this change. In addition, the reporting templates/examples provided are as requested by EON during the working group meetings

Question 2		
Respondent	**Category**	**Comments**
Scottish Power	Large Supplier	It may be reasonable to revisit these proposals once the effects of other initiatives are established. We also think that other approaches might need to be tried in an effort to elicit detailed costing information from Parties: e.g. still confidential, but offering a check-box facility that gauged a RoM.
SSEN	Electricity Network Party	N/A
Electricity North West Limited	Electricity Network Party	The revised proposal indicates that no service requests will be exempted from traffic management. However, previously the ability to Read Supply Status would have been exempted.
		The capacity management examples provided by the DCC indicate that a DNO would receive a 7% share of traffic versus a Supplier receiving 84% - during a storm event this means that a Supplier could potentially be sending 10 times as many service requests as a DNO while the DNO themselves may find their ability to check the supply status of customers severely impacted.
Utilita	Large Supplier	In Approving this Modification, we understand this solution is for extreme cases where capacity threshold has been reached. We do not expect this support to be enforced regularly but only in cases of exception. Although we Approve this solution to Service Request management, further clarity on certain aspects of this modification is necessary:
		- It is currently unclear how DCC wish to determine whether the meter is in prepayment mode, for applying the allocation
		- What happens if the capacity allocation is breached but it contains SRs that are deemed to be priority, e.g. PPM top-ups. For example, during the Beast from the East, PPM top-ups where dramatically higher than usual. If a capacity threshold was deployed during a scenario like this, how could we be sure that PPM top-ups to avoid self-disconnection continue to be 'allowed through' and not throttled?