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SECMP0015 ‘GPF timestamp for reading instantaneous Gas values’ Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **reject** SECMP0015 under Self-Governance. It believed the modification better facilitated SEC Objectives (a)¹ and (c)², but could not justify the cost of the Proposed Solution.

Modification Report Consultation

Three responses were received to the Modification Report Consultation. The majority of respondents believe the modification should be approved. They considered the modification better facilitated SEC Objectives (a) and (c).

¹ (a) To facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

² (c) To facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Modification Report Consultation responses

Summary of responses

There were three responses to the SECMP0015 Modification Report Consultation. All three of the respondents were Large Supplier Parties. There were two votes to approve and one to reject. The reasons given for supporting the modification were that it would support meter triage, that it would improve the outcome for consumers in terms of billing and from a business perspective would improve customer data accuracy. The respondent voting to reject stated they were supportive of the intent of the solution, but believed the cost cited for implementing the solution undermines the business case and they could not justify supporting it.

Comments on the solution cost

The respondent believing the modification should be rejected did this on the grounds that the cost of the Modification Proposal would outweigh potential savings and improvement of service to the consumer.

The other two respondents, whilst voting to approve, acknowledged they were concerned with the cost of the solution. One stated that they wanted the Data Communications Company (DCC) to provide information on how a cost saving could be achieved in the testing phase to reduce the current figure of £4.6 million by using actual Devices rather than emulators. The other respondent made clear that this needed to be discussed prior to being progressed and stating that the cost for this change as it stands was far outside their expectation.

The Smart Energy Code Administrator and Secretariat (SECAS) sought further information from Users on these points. A verbal update was given at the meeting to cover User's comments on the business case when considering the industry cost, individual User cost and any savings that Users will make if the Modification Proposal were to be approved.

Comments and additional information from the DCC

The DCC raised a number of comments on the Modification Report and legal text during the Modification Report Consultation. The comments are summarised below:

- The DCC believed references in the legal text would need amending due to being measured against older versions of the SEC.
- It was mentioned that there should be an impact on Schedule 11 by adding end date for the old specification and a start date for the new specification so there is an obligation on the DCC and Gas Smart Metering Equipment (GSME) manufacturers to implement the changes.
- The DCC believe the changes to the DCC System made under this modification need to be forward compatible.
- The DCC wasn't sure from the text provided how the Communications Hubs would work with the GSME and the In-Home Display (IHD).
- The DCC wanted a clarification that Smart Metering Equipment Technical Specifications (SMETS) 1 Devices will not support the functionality in this Modification Proposal, but could later on request alignment of SMETS1 and SMETS2 behaviour.

In line with these comments, the legal text has been revised to accommodate these changes and clarifications to the technical specifications and note an impact on SEC Schedule 11. It was noted that a definition in the Message Mapping Catalogue (MMC) already exists that acknowledges the Proposed Solution will only affect SMETS2 in Section 1.4, and that this guidance should be pointed out to Users.

Change Board vote

Change Board vote

The Change Board voted to **reject** SECMP0015 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	3	3	0	Reject
Small Suppliers	0	2	0	Reject
Network Parties	0	2	0	Reject
Other SEC Parties	1	2	0	Reject
Consumer Representative	0	0	0	-
Overall outcome:				REJECT

Views against the General SEC Objectives

Objective (a)

The majority of the Change Board believed that SECMP0015 better facilitated SEC Objective (a) as it would improve the current conditions for Supplier Parties and consumers using Smart Meters. However, members voted to reject the Modification Proposal despite this, due to the cost of the solution presented, even though they acknowledged Objective (a) was improved.

Objective (c)

The majority of the Change Board believed that SECMP0015 better facilitated SEC Objective (c) as it would help provide relevant and accurate information to consumers using Smart Meters through timestamping the use of their GSME. However, members voted to reject the Modification Proposal despite this, due to the cost of the solution presented, even though they acknowledged Objective (c) was improved.

Change Board discussions

The Change Board members all acknowledged that the Modification Proposal delivers tangible benefits for industry and that it would resolve issues arising between consumers and Supplier Parties concerning when GSMEs are in use. However, Change Board members, including one Modification

Report Consultation respondent who had previously voted in favour of approving the Modification Proposal, stated that the cost of the Proposed Solution was too much and that they couldn't justify the benefits for that cost. Members also enquired into why there was a significant increase from the previously predicted cost of the total solution from the Preliminary Assessment to what was returned in the Impact Assessment. SECAS explained that the larger solution cost was due to the testing that would have to be undertaken prior to implementation. These would likely be reduced when combined with other Modification Proposals, but that as a standalone cost it would still cost in the region of £4.6 million. The DCC confirmed that this was the case.

The Change Board questioned why this had changed from an Authority Determined Modification to a Self-Governance Modification. SECAS confirmed that this had been agreed to be a Self-Governance Modification when the Modification Report had been approved by the Panel.