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SECMP0067 ‘Service Request Traffic Management’

Annex I

Second Refinement Consultation responses

About this document

This document contains the full collated non-confidential responses received to the SECMP0067 Second Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No	<p>Whilst the DCC have now provided a business case analysis by citing the cost to industry if the DCC systems were to be unavailable due to overload. In this respect the costs stand up to scrutiny although as ever DCC costs for change remain very high.</p> <p>However, we are rejecting this solution on the following grounds:</p> <ol style="list-style-type: none"> 1) with this change the DCC are seeking to flatten the traffic curve which is reasonable in itself but there needs to be a mechanism to cope with Service Requests which cannot be scheduled or flattened, SR 7.4 Read Supply Status is a case in point, DNO's will use this command to check supply status following network faults/storm events and as such we cannot predict when we will need to use this command. DNO's will also need to use SR7.4 Read Supply Status in far higher volumes than originally expected due to the high numbers of SMETS1 meters forecast to be enrolled by DCC as SMETS1 meters do not support Power Outage reporting. If the use of this command is restricted by DCC Traffic Management solution then it undermines the DNO's Power Outage management solutions and benefits case, this is on top of the Power Outage solution currently delivered by DCC to DNO's which significantly fails to meet the published SEC requirements. 2) The proposed DCC mechanism is predicated on calculations based upon the agreed DCC 'system capacity'. Whilst DCC has provided illustrations of capacity calculations it has not explicitly stated what the actual system capacity is. Before agreeing to this modification we need the DCC to publish a clear statement on its current system capacity and the expected capacity as installed meter volumes increase over time. The Traffic Management solution should not be used by DCC as a mechanism to suppress 'reasonable' User demand.

Question 1			
Respondent	Category	Response	Rationale
SSEN	Electricity Network Party	No	<p>As per our previous consultation response, SSEN fully support this SEC Mod, however we are rejecting this Modification for the reasons detailed below.</p> <p>As detailed in our previous response, 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.</p> <p>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.</p> <p>As a DNO we are unable to forecast unplanned faults on the network, this can result in specific spikes in SRV demand. Alongside this, looking forward, other SRV's may need to be also added to the prioritised Service Requests list in the future. Without this list being implemented, we are unable to approve this modification.</p>
Northern Powergrid	Electricity Network Party	No	<p>Northern Powergrid accepts the principle that DCC's need to manage traffic on its network and that costs for unnecessary capacity or unavailability due to overload need to be avoided, however we are rejecting this Modification for the reasons detailed below.</p> <p>Details of the current system capacity threshold are not provided and therefore it is unclear how often a breach, which would result in the exceptional circumstances may occur. End to end capacity and response times need to be considered.</p>

Question 1			
Respondent	Category	Response	Rationale
			<p>We would expect that any associated costs of scalable traffic management to be included in the current DCC service charge. The amount of meters enrolled on the network is currently considerably lower than the enduring number anticipated, therefore sufficient technical headroom can be reasonably expected at this point in the rollout.</p> <p>We believe that existing processes and controls provide mechanisms to prevent or limit traffic peaks on the DCC network, such as the Service Request forecast process, Anomaly Detection Thresholds and quarantine controls. If more robust processes to manage user behaviour, or prevent abuse, are required, these should be considered first.</p>
Western Power Distribution	Electricity Network Party	No	<p>Whilst we agree that it is sensible to have some protection for the DSP in the event of extreme circumstances, we question if this is the best solution. We have concerns that this solution is potentially not addressing the root cause.</p> <p>We would expect this mechanism to be used rarely (if ever) due to the DCC being designed to cope with Users expected traffic and existing protection mechanisms that are in place.</p> <p>We are unsure of the cost benefit case for the proposed solution.</p>
E.ON	Large Supplier	No	<p>The revision has not addressed our principle objection from the previous iteration. 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.</p> <p>In addition, the split delivery of this change if approved by September 2020 will result in significant manual overhead to manage the resulting failures, in the event the traffic management measures are operationally triggered.</p>

Question 1			
Respondent	Category	Response	Rationale
UK Power Networks	Electricity Network Party	No	<p>UKPN do not agree with this proposal for the following reasons:</p> <ol style="list-style-type: none"> 1) UKPN are not aware of what the DCC current total system capacity is or at what point it becomes at risk. We would be grateful if this could be explained clearly to all parties. 2) DCC need to confirm to UKPN how their system capacity will flex to accommodate the increasing volumes of both SMETS1 and SMETS2 meters being installed by suppliers. UKPN would like assurance from the DCC that their system will be capable of managing this known increase in service requests from the new meter installations, instead of using mitigating actions, such as this SEC MOD change request, to throttle back the volume of service requests their system will be receiving. 3) Some Service Requests are vital to UKPN's customers such as the Service request 7.4 Read Supply Status, which are difficult to forecast due to the uncertain nature of supply disturbance events / Severe Weather events. During a Severe Weather event, there would be a larger than normal amount of Service Requests of this type. Should a Throttling scenario occur at this time, UKPN would be failing to deliver a service to our customers and this is not acceptable. 4) UKPN will soon be reading Smart Meters to collect consumption and voltage readings to provide the business with network related data for LV network modelling, which is one of the fundamental business benefits of Smart Metering. This will generate a large number of Service Requests and it is expected that all DNOs will be doing the same. The impact of unscheduled Throttling will be detrimental to this basic benefit to DNOs and their customers.
Utilita	Large Supplier	We do not support this	<p>Rationale: In order to mitigate the risk of prepayment customers going off supply this mod must have prioritisation across the industry for time critical Service Requests.</p>

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Question 1			
Respondent	Category	Response	Rationale
		<p>modification primarily because the prioritisation element is not fit for purpose. SECMP0028 sets out a solution we believe should be included as part of this mod.</p>	<p>The solution has two main elements to it, traffic management and service request prioritisation. These two elements must be considered together.</p> <p>Prioritisation: during the course of the refinement period a number of solutions have been discussed which included SECMP0028. The ultimate solution proposed in this SECMP0067 is not fit for purpose and is the reason for Utilita to reject this mod.</p> <p>SMETS2 and Enrolled SMETS1 meters produce UTRNs differently. Enrolled SMETS1 meters require access to the DCC systems in order to create UTRNs – without access to the DCC customers will not be able to top up their meters and remain on supply.</p> <p>Utilita is concerned that there is a high likelihood, based on experience, that SMETS2 vend traffic maybe throttled back leading to unmanageable call volumes and thus S2 customers going off supply, particularly as this could happen at any time with no prior warning or time for either the customer or Utilita to prepare.</p> <p>This risk is amplified for S1 meters under E&A where the vends are only supported by the DCC network and throttling will cause otherwise avoidable disconnections.</p> <p>We work hard as an organisation to help customers avoid disconnections, however, we believe this Mod' (without market-wide prioritisation) will increase the risk of disconnections to the detriment of all pre-payment customers and that it is being considered without thought for the impacts on approximately 5 million pre-payment customers or the Suppliers that supply them.</p> <p>Utilita understand our own customer behaviour and we don't have the DCC analysis to be able to compare and contrast where the issues are likely to arise. Utilita would like to see the Impact Assessment undertaken by the DCC/BEIS to assess this impact and better understand how the DCC and BEIS have arrived at the conclusion that this Mod is in the interests of pre-payment customers. The reason the prioritisation is not adequate is because it is done at a supplier level and not across the market as a whole. It is of</p>

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Question 1			
Respondent	Category	Response	Rationale
			<p>paramount importance that this holistic approach is taken to prioritisation for commands relating to keeping prepay customers on supply and managed appropriately. Whilst a supplier may be able to prioritise within its' own SR load, prioritisation across portfolios must also be provided at time of system stress.</p> <p>Additionally, whilst the solution provides for 20% additional capacity for prepay customers, the analysis done is now years old and should be redone and shared with industry to verify it remains valid. There are now significantly more smart prepay customers than when the analysis was done originally and we must validate that the 20% provision will support the needs of the customers.</p> <p>As such, we see the need to either amend SECMP0067 or re-initiate SECMP0028 as an intrinsically linked modification.</p> <p>Traffic Management: Utilita agrees a solution needs to be in place to maximise the efficient use of and prevent system outage of the DCC Systems. Currently, when system capacity is exceeded this means no Service Requests reach the Data Service Provider (DSP) until the issue is resolved. This results in a lack of protection for consumers (especially prepayment) leading to the potential of many consumers going off supply – SMETS1 enrolled meters will not be able to top up at all as DCC system access is required to create UTRNs.</p> <p>Utilita is concerned regarding the DCC capacity available. Capacity figures for the DCC system under various loads have not been made available. It is therefore unclear how the capacity modelling is done. In order to robustly assess this solution and whether this will provide sufficient protection for prepay customers, we request DCC share the full modelling undertaken to prove that the proposals set out in this modification are fit for purpose.</p>

Question 1			
Respondent	Category	Response	Rationale
			<p>Under the processes associated with the price caps, there is a high likelihood that suppliers will need to update tariffs and prices on their meters. These requirements will all be at a similar time and can be expected to exert pressure on the DCC systems. As there are now caps on all standard variable/default tariffs, the numbers of meters to be updated at the same time is much larger than before.</p> <p>This process and our understanding gained over the last few years underpins our conviction that traffic management alone is not sufficient and cross market prioritisation must be available at peak times.</p> <p>The main problems that cause most pressure on vend message volumes apart from price changes and reading are not related to predictable or supplier driven events. For example, the Beast from the East, caused outages due to heavy customer demand – network capacity is most likely to be breached during these periods and modelling must be done on these events and other high stress scenarios to fully understand the potential impacts and inform the solution proposed.</p>
British Gas	Large Supplier	Yes	<p>We agree with the issued identified and the principle of the modification. Based on the information provided by the DCC, the proposed solution appears proportionate. The proposed solution looks to only impact on those Users that are responsible for the issue. This appears to be more appropriate than a more general approach that would impact on all Users (e.g. general throttling of all Users) or a solution that builds additional capacity to accommodate increased levels of unintended / malicious network traffic.</p>

Question 2: Will there be any impact on your organisation to implement SECMP0067?

Question 2			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	Yes	We request that the DCC provide current system capacity details and also a forward plan for target system capacity which allows us to model what the restrictions will mean to our operations.
SSEN	Electricity Network Party	Yes	From the modification documentation, we are unable to fully understand the current capacity of the system and how this mod will scale with the roll out. Due to this, we are unsure on the full impact to SSEN.
Northern Powergrid	Electricity Network Party	Yes	<p>From the Modification documentation, we are unable to fully understand the current capacity of the system and how this Modification may be used. Therefore we are unsure on the full impact to Northern Powergrid.</p> <p>As a DNO we are unable to forecast unplanned faults on our electricity distribution network, which could result in operational peaks in Service Request demand whilst we use the smart metering infrastructure to assist our investigations. Should flattening be applied during a critical activity our customer service would be directly impacted and operational costs would increase. We would also incur costs to avoid any impact to our systems and processes.</p>
Western Power Distribution	Electricity Network Party	Yes	If this modification is implemented as proposed then as a minimum we will need to uplift to the relevant DUIS version in order to receive the new HTTP alert code. There is the potential that we would also need to amend our systems to automatically handle this code and prioritise Service Requests sent to the DCC during any period where the mechanism was active.
E.ON	Large Supplier	Yes	Significant effort will be required to amend auto-remedial actions for all failed commands where the reason code was http 429, as these would be required to trigger retries after the suggested time period. This work would not be completed for the interim solution when the

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Question 2			
Respondent	Category	Response	Rationale
			<p>http 503 message is returned, as this would effectively double the development effort and testing time having to change E.ONs solution twice in a short space of time.</p> <p>In the interim period, whilst the http 503 response was being used, E.ON will have to handle the command failures manually, which will require significant intervention to restart failure orchestrations.</p>
UK Power Networks	Electricity Network Party	Yes	<p>It is not clear how the DCC will inform UKPN of the fact that a Throttle scenario is active if throttling was implemented.</p> <p>UKPN need to understand the DCC Capacity levels being discussed for this change.</p> <p>Once informed of this, there will a need for system changes to remodel how and when we retry failed Service Requests, this will impact business processes in addition to systems.</p> <p>UKPN have spent significant sums of customers' money to ensure that Service Request 7.4 is fast tracked to DCC and that will need to be reviewed and adjusted in times of "Throttle".</p> <p>DCC Adaptor changes will be required to recognise this as different from a straight forward "time-out" which is something we experience now.</p>
Utilita	Large Supplier	Yes	<p>This is likely to result in prepay customers' critical commands being throttled due to a lack of a fit for purpose prioritisation solution.</p>
British Gas	Large Supplier	Yes	<p>Yes, there would be some minor effort to integrate the new http error code into our business processes. We would expect to see a DUIS change to accommodate this, but this would be part of a more significant scheduled DUIS uplift and therefore minimal incremental impact. If the modification were to be implemented in two parts (i.e. use existing http error codes initially) there will be some minor process effort required to implement.</p>

Question 3: Will your organisation incur any costs in implementing SECMP0067?

Question 3			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	Yes	<p>Whilst it is difficult for us to cost the impact in absence of the information we request in our response to Question 2, we estimate the cost to Electricity North West of implementing this modification to be in excess of £100k and will require 12 months to implement. The estimate is on the assumption that we will need to build complex routines to manage message re-tries where the original request has been rejected by this DCC Traffic Management solution.</p> <p>As per our response to the first refinement consultation the modification report mentions “fair share” and we would be interested in additional details of how this has been defined / calculated.</p> <p>Whilst you ask that our rationale exclude central costs we must mention that Electricity Network Users are required to pay DCC charges based upon their respective share of MPANs – our licence costs are calculated on a population of 2.4m MPANs (smart and non-smart). However, only 145k smart meters have been enrolled within our region of the CSP Northern network, a significant disparity when compared with DNOs served by the Southern and Central CSP regions.</p> <p>The net effect of the disparity between Northern and Central/Southern region installations is that the customers of Electricity North West are having to pay a higher premium than customers in other regions for our access to the DCC.</p>
SSEN	Electricity Network Party	Yes	<p>As we are unsure of how often this functionality will be invoked, we are unable to an estimate the potential costs. Based on the solution, this will require substantial system changes to handle and manage the different retry delay periods upon rejection from the DCC.</p>

Question 3			
Respondent	Category	Response	Rationale
Northern Powergrid	Electricity Network Party	Yes	As we are unsure of how often this functionality will be invoked, we are unable to an estimate the potential costs. Based on the solution, this will require substantial system changes to handle and manage the different retry delay periods upon rejection from the DCC.
Western Power Distribution	Electricity Network Party	Yes	It is difficult at this time to provide an estimate of costs for this change. A DUIS uplift is a simple enough value to calculate (and we can advise this if necessary), but in order to change the systems to be enable prioritisation of service requests will involve considerable time, effort, resource and costs.
E.ON	Large Supplier	Yes	Costs unknown at this stage. Costs will be subject to commercial assessment by E.ON third party service provider, but will be significant to implement automated changes to the handling of all commands for this scenario.
UK Power Networks	Electricity Network Party	No	There are no cost savings to UKPN by the implementation of this modification. The cost of changing the DCC Adaptor would be in excess of £150k as changes would be required to the entire system, processes, and business models. This is an estimate based on other changes made in recent years. We estimate it would take 12 months to implement these changes.
Utilita	Large Supplier	Yes	these are undeterminable at this present time due to a lack of transparency relating to system capacity.
British Gas	Large Supplier	Yes	As above (Q2), there would be minor implementation costs to accommodate new http error code. This would be wrapped up in a DUIS release so would form part of a bigger scheduled release / implementation. The incremental delivery costs for this modification would be very minor. We would expect this to be implemented via a scheduled DUIS uplift (e.g. v4.1 or v5.0).

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Question 4: Do you believe that SECMP0067 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No	While we understand the intent of this proposed modification we are not convinced that any General SEC Objectives will be better facilitated by its implementation.
SSEN	Electricity Network Party	No	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.
Northern Powergrid	Electricity Network Party	No	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.
Western Power Distribution	Electricity Network Party	No	<p>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.</p> <p>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.</p>

Question 4			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	The modification appears to offer additional protection to the DCC System in times of high demand. However, the level of information outlined impedes our ability to complete a full impact assessment.
UK Power Networks	Electricity Network Party	No	UKPN cannot identify any SEC objectives that would be better facilitated by this proposed modification.
Utilita	Large Supplier	Yes	SECMP0067 plus the solution (or equivalent solution) from SECMP0028 would better facilitate Objectives A and E.
British Gas	Large Supplier	Yes	We agree that implementation would better facilitate General SEC Objectives (a) and (e) as indicated in the Modification Report.

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0067 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No	Please see our responses to Question 1, 2,3 & 4.
SSEN	Electricity Network Party	No	Please see Question 1
Northern Powergrid	Electricity Network Party	No	Please see our responses to Question 1, 2 and 3.
Western Power Distribution	Electricity Network Party	No	<p>We do not believe that the Authority's request for 'clear succinct and complete assessment of the costs and benefits of the three options' has been addressed.</p> <p>We would also like to understand the industry costs involved with this change in addition to the DCC costs as we feel that this could be significant.</p> <p>We currently cannot see a cost versus benefit cast for this modification.</p>
E.ON	Large Supplier	No	Delivery of http 429 should not be separate to the main body of changes.
UK Power Networks	Electricity Network Party	No	The DCC system should be correctly scaled to meet the demand of the Smart Meter roll out, and to cater for events that result in an increase in Service Requests. The number of meters and Service Requests are not a surprise and the DCC system should be sized accordingly to cope with this, instead of impacting its customers with additional costs and a reduction of our ability to provide the customer benefits that each DNO has declared. There

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Question 5			
Respondent	Category	Response	Rationale
			would a number of negative customer impacts if customers are unable to rely on smart meters, e.g. to seamlessly notify their DNO in the event of a loss of supply incident.
Utilita	Large Supplier	Not in isolation or as drafted - the addition of SECMP0028 must be included before this could be considered as a solution to the identified problem.	See question 1
British Gas	Large Supplier	Yes	We do however disagree with the cost estimate that has been provided for the alternative 'motorway' solution by the DCC. The 'sizing' for additional motorways has been carried out using all User traffic to establish the cost – this wouldn't be necessary as the motorways would only need to cater for the increased demand of the User that has been compromised / has an issue. On this basis the cost of the alternative solution should be much lower. However, we do not think that the lower cost would be less than the implementation cost for the proposed solution (or not significantly lower) and we therefore support implementation of the proposed solution.

Question 6: How long from the point of approval would your organisation need to implement SECMP0067?

Question 6			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	At least 12 months.	Based on any final solution we would need to review our systems and processes and complete any relevant changes.
SSEN	Electricity Network Party	>12 Months	As this Mod would require substantial system changes as noted in question 3, this would require enough lead time to build and test functionality and performance.
Northern Powergrid	Electricity Network Party	>12 Months	As this Modification would require substantial system changes as noted in Question 3, this would require enough lead time to build and test functionality and performance.
Western Power Distribution	Electricity Network Party	12 months	As this would require system changes we would require a minimum lead time of 12 months.
E.ON	Large Supplier	9-12 months	Based on current limited information available and delivery of the http 429 error code being separated from the main delivery, there would be little point in delivering any changes before November 2021.
UK Power Networks	Electricity Network Party	12-15 months at least.	Significant DCC Adaptor change would be required. Fault system processes would require amendment. Business processes would require change.
Utilita	Large Supplier		
British Gas	Large Supplier	<1 month (phased implementation)	If the modification were to be implemented in two parts, we would not require much time (if any) to implement based on the use of the existing http 503 error codes. Standard SEC

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Question 6			
Respondent	Category	Response	Rationale
			implementation timescales would need to apply for the enduring part of the solution as that would need to be part of a scheduled DUIS release (e.g. November 2021).

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

Question 7			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No comment	No comment
SSEN	Electricity Network Party	No	SSEN feel that if the modification is approved, an implementation date of 24 June 2021 does not provide enough time to build, implement and test the required solution within SSEN.
Northern Powergrid	Electricity Network Party	No	Northern Powergrid feel that if the Modification is approved, an implementation date of 24 June 2021 does not provide enough time to build, implement and test the required solution within Northern Powergrid.
Western Power Distribution	Electricity Network Party	Yes	We can understand the argument for the implementation approach detailed in the modification.
E.ON	Large Supplier	No	The DSP uplift to introduce the http 429 must be delivered at the same time as the other changes – it's an integral part of the solution.
UK Power Networks	Electricity Network Party	No	There is more information required before this question can be answered – once again visibility of the DCC system capacity is needed. In addition UKPN needs to understand what share of the overall capacity will be available to UKPN during a period of “Throttle”.
Utilita	Large Supplier	No, we disagree with the implementation	See Question 1.

Question 7			
Respondent	Category	Response	Rationale
		approach because the solution set out in SECMP0067 is not a full solution.	
British Gas	Large Supplier	No	If a phased approach, we would support an earlier implementation (with the required DUIS changes following in November 2021).

Question 8: Do you agree that the legal text will deliver SECMP0067?

Question 8			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No comment	No comment
SSEN	Electricity Network Party	No	The legal text refers to rejecting non-Priority Service requests but does not detail anything further about a Priority List. It has been confirmed that the functionality will exist but will be turned off at implementation. The legal text does not allow for this functionality to be used or managed at any point.
Northern Powergrid	Electricity Network Party	No	The legal text refers to rejecting non-Priority Service requests but does not detail anything further about a Priority List. It has been confirmed that the functionality will exist but will be turned off at implementation. The legal text does not allow for this functionality to be used or managed at any point.
Western Power Distribution	Electricity Network Party		We have not fully reviewed the legal text at this time.
E.ON	Large Supplier	Yes	The text accurately reflects the proposed changes
UK Power Networks	Electricity Network Party	No comment.	No comment.
Utilita	Large Supplier	The legal text fails to deliver a fit for purpose	

Question 8			
Respondent	Category	Response	Rationale
		solution for prioritisation.	
British Gas	Large Supplier	Yes	The legal text supports the intent of the modification proposal.

Question 9: Do you believe there will be any impacts on or benefits to consumers if SECMP0067 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Electricity North West Limited	Electricity Network Party	No comment	No comment
SSEN	Electricity Network Party	Yes	If SRV's that relate to Supply Management (7.4) are rejected, this will have a negative impact on the consumers service.
Northern Powergrid	Electricity Network Party	Yes	If SRV's that relate to Supply Management (7.4) are rejected, this will have a negative impact on the consumers service.
Western Power Distribution	Electricity Network Party		No comment
E.ON	Large Supplier	Yes	Some benefit may be accrued in the event of a denial of service attack being mitigated. Consumers may also be negatively impacted due to the removal of the Priority service request list. Installs may be impacted, which could have been avoided if that element of the solution had been retained.
UK Power Networks	Electricity Network Party	Yes	The impact on our customers will be that in a period of "Throttle" our ability to identify a supply status will be impacted, i.e. for UKPN to ping a meter. This could mean that DNOs would not know when their customers are off supply, and could mean customers contacting DNOs to alert them that they are off supply which would defeat one of the core benefits of having smart meters.

Question 9			
Respondent	Category	Response	Rationale
			<p>This will result in UKPN having to attend site to establish the supply status. This will impact the customer's ability to know as soon as possible that the supply issue is within their property as opposed to a Network issue.</p> <p>We are cognisant that throttling could impair the proliferation of low carbon technology such as EVs and heat pumps. It seems to us, that with the continued transition to Net Zero, it would be sensible to expect service request traffic to increase and therefore the more enduring solution would be to increase the capacity.</p>
Utilita	Large Supplier	Yes, impacts on customers	See question 1.
British Gas	Large Supplier	Yes	Implementation of this modification could prevent a denial of service event that impacts many / all Users. If users are unable to take DCC services then this could have a detrimental impact / consequence for customers, in particular prepayment customers if they are unable to vend / apply additional credit.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
Electricity North West Limited	Electricity Network Party	No comment
SSEN	Electricity Network Party	N/A
Northern Powergrid	Electricity Network Party	No comment
Western Power Distribution	Electricity Network Party	
E.ON	Large Supplier	
UK Power Networks	Electricity Network Party	
Utilita	Large Supplier	
British Gas	Large Supplier	n/a