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MP090

‘Incorporation of Non GBCS Non-Mandated Alerts into the SEC’

Modification Report

Version 1.0

14 September 2020

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has four annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the redlined changes to the SEC required to deliver the Proposed Solution.
- **Annex C** contains the full DCC Impact Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation.

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1. Summary

This proposal has been raised by Emslie Law from SSE.

Many DCC Users only recognise Alerts defined in SEC Schedule 8 – ‘Great Britain Companion Specifications’ (GBCS). As a result, DCC Users’ systems have not been designed to recognise Non GBCS Non-Mandated (NGNM) Alerts that are not defined in the GBCS. These Alerts are currently being sent to DCC Users with no contextual information and no means to disable them. To monitor and manually define these Alerts is an inefficient working practice, especially if the DCC User deems the Alert unnecessary. This will continue until the NGNM Alerts are migrated into the SEC.

Three options were considered for migrating the NGNM Alerts into the SEC, each with different levels of functionality associated with them, and therein different predicted costs.

1. Migrate the NGNM Alerts into GBCS Table 16.2 only;
2. Migrate the NGNM Alerts into GBCS Table 16.2, with associated changes to the DCC Parse and Correlate software; or
3. Migrate the NGNM Alerts into GBCS Table 16.2, with associated changes to the DCC Parse and Correlate software, and make them configurable by DCC Users.

The Proposer, supported by the Working Group, decided to go ahead with the second solution option, to incorporate the Alerts and implement supporting technical changes but not make the Alerts configurable. This solution will cost approximately £17,000 with a three-month lead time from project initiation through to completion. As this modification will make changes to the GBCS implementation is recommended in the November 2021 SEC Release (unless an earlier Release make updates to the SEC Technical Specifications), if approved as self-governance modification.

2. Issue

What are the current arrangements?

Device Alerts are unsolicited messages sent by Devices to DCC Users e.g. a Supplier. SEC Schedule 8 ‘GB Companion Specification’ defines the structure of the Alerts and contains a listing of Alerts, distinguishing between mandated and non-mandated Alerts. These GBCS Mandated Alerts and GBCS Non-Mandated Alerts can be found in Table 16.2 within the GBCS.

NGNM Alerts are Alerts that are built into Devices by Device manufacturers. These conform to GBCS formats but are not included in GBCS Table 16.2.

Suppliers and manufacturers have a general (but non regulatory) responsibility to ensure all Alerts supported by their Devices beyond those specified in the SEC are captured in the Non-GBCS Non-Mandated Alerts Register on the [SEC Website](#) until they are adopted into the SEC.

What is the issue?

Providing the Alert is in the correct format, the GBCS Parse & Correlate software allows any Alerts (whether they are included in GBCS or not) sent by Devices to be passed to the DCC User.

Many DCC Users only recognise Alerts defined in the GBCS as when the Smart Metering Implementation Programme (SMIP) was in its infancy Non GBCS Alerts were not expected to be in use. As a result, DCC Users' systems have not been designed to recognise NGNM Alerts.

As these are currently not included in the GBCS, the Parse & Correlate software provides the Alert code but does not provide a description of the problem the Alert is communicating. Suppliers therefore receive Alerts but are unable to identify the reason for them. Whilst Suppliers could access this information from the SEC website, this would be highly manually intensive. Alternatively, each Supplier could amend their systems to incorporate the Alert codes from the SEC website, but this would involve a large number of individual system changes.

Additionally, whilst a Supplier may know which NGNM Alerts to expect from meters and Devices installed by themselves, they will continually inherit meters and Devices for which they were not the original installer and will be unaware of NGNM Alerts on Devices that have 'churned' to them.

What is the impact this is having?

Depending on the individual Alert either the Supplier or the Network Operator can configure the Alerts by setting them on or off according to their business needs. In order to make NGNM Alerts configurable these would need to be included in GBCS Table 16.2 and be added to the DCC User Interface Specification (DUIS) Schema. If this is not implemented, Suppliers and Network Operators will receive large numbers of Alerts which have no description and which they are not able to stop receiving.

3. Solutions

Proposed Solution

The solution chosen was the second option, to incorporate the Alerts into GBCS and implement supporting technical changes to allow them to be readable, but not make them configurable. The Proposer agreed that this solution was best as the incorporation of these changes will help the Service Users to identify the NGNM Alerts but will not be as expensive as making the Alerts configurable. The Proposer, supported by the Working Group, believed that the business case was not sufficient to support the changes to make the Alerts configurable.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties	✓	DCC

Large Suppliers, Small Suppliers and Network Parties are impacted as they receive Non GBCS Non-Mandated (NGNM) Alerts but are unable to identify the reasons for them. This change will allow them to recognise Non GBCS Non-Mandated (NGNM) Alerts that are not defined in GBCS.

Device manufacturers will be impacted as SEC Parties receiving Alerts will now have greater visibility around them and potentially more innovation can take place.

The DCC will be impacted as they will have to make system changes to implement the solution.

DCC System

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex C.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 8 'GB Companion Specifications'

Consumers

There will be no impact on Consumers.

Other industry Codes

There will be no impact on other industry Codes.

Greenhouse gas emissions

There will be no impact on Greenhouse gas emissions.

5. Costs

DCC costs

The cost for the DCC to implement this modification will be £17,000. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£17,000
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

More information can be found in the DCC Full Impact Assessment response in Annex C.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

During the Refinement Consultation, no Parties provided any information on costs to implement this modification.

6. Implementation approach

Agreed implementation approach

Panel has agreed an implementation date of:

- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received on or before 4 May 2021, or
- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received after 4 May 2021 but on or before 3 May 2022.

As the changes impact a Technical Specification, they must be implemented in a SEC Release that includes an uplift to the Technical Specifications to prevent more than one change to the Technical Specifications in a calendar year. The November 2021 SEC Release is the next SEC Systems Release that this modification can be included in which is expected to include Technical Specification

changes. If, following a decision and allowing enough lead time, an earlier Release made updates to the Technical Specifications this modification may be included in that Release.

No SEC Parties provided any information around User system lead times during the Refinement Consultation.

7. Assessment of the proposal

Solution development

Configuration

The Alert codes allocated to the NGNM Alerts were indicative of configurable Alerts. For this reason, the first Preliminary Assessment detailed the solution to allow these Alerts to be configurable (functionality for the DCC User to turn them on and off). However, at the Working Group the Proposer stated that was not what was required. SECAS challenged this, explaining that these Alert Codes indicated they should be configurable, which was further discussed at the Department of Business, Energy and Industrial Strategy (BEIS) led Technical Specifications Issue Resolution Sub-Group (TSIRS). The recommendation was that all solution options should be assessed and leave it up to the Modification Process to select the favoured option.

A second Preliminary Assessment was performed against two other solution options. This was shared for discussion at the June 2020 Working Group.

Discussion on the solution options

Following the outline of SECAS' proposed next steps, the Working Group were asked which of the solution options they preferred. The Proposer highlighted that the current solution used to address the issue aligns closely with the solution option 2, and that there would need to be a strong justification to configure Alerts as the price difference between the two alternative options is vast. It was asked whether these Alerts could be configured on the Device or via the DCC. The consensus was that most Alerts can be configured on the Device.

Working Group members commented that option 2 seems most sensible from a price perspective. The Proposer expressed that if Alerts are not currently configurable then there isn't a justification to make such Alerts configurable in the future. The Proposer also stated that though it would be beneficial to make these Alerts configurable, the cost of implementing option 3 is not justifiable.

The Working Group was expressing a preference for option 2. However, it was agreed that all of the solution options should be put forward in the Refinement Consultation to obtain broader input.

Support for Change

The three options were presented to a second Working Group. The Proposer confirmed that the preferred option was option 2 and that option 3 was significantly more expensive without a business case for making that change. The Working Group agreed that option 2 was the preferred option however, they considered that another Party may want to implement option 3. The Proposer agreed

that if this was the case another Party could raise a draft proposal to implement this, although they would have to justify it with a sound business case.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification would better facilitate SEC objective (a) as it supports the efficient provision, installation and operation, as well as interoperability of Smart Metering Systems. The implementation of NGNM alerts into the GBCS would ensure DCC Users' systems can recognise these alerts.

Appendix 1: Progression timetable

The Modification Proposal will be presented to the Panel on 11 September 2020.

Timetable	
Event/Action	Date
Draft Proposal raised	16 Oct 2019
Presented to CSC for comment and recommendations	29 Oct 2019
Panel converts Draft Proposal to Modification Proposal	15 Nov 2019
First Preliminary Assessment requested	15 Nov 2019
First Preliminary Assessment returned	11 Feb 2020
Modification discussed with Working Group	4 Mar 2020
Second Preliminary Assessment requested	15 Apr 2020
Second Preliminary Assessment returned	11 May 2020
Modification discussed with Working Group	3 Jun 2020
Refinement Consultation	12 Jun – 3 Jul 2020
Impact Assessment costs approved by Change Board	24 Jun 2020
Impact Assessment requested	7 Jul 2020
Impact Assessment returned	18 Aug 2020
Present Modification Report to Panel	11 Sep 2020

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
BEIS	Department for Business, Energy and Industrial Strategy

Glossary	
Acronym	Full term
DCC	Data Communications Company
DUIS	DCC User Interface Specification
GBCS	Great Britain Companion Specification
NGNM	Non GBCS Non-Mandated
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
TSIRS	Technical Specification Issues Resolution Sub-group

MP090 ‘Incorporating Non GBCS Non Mandated Alerts into the SEC’

Annex A

Business requirements – version 1.3

About this document

This document contains the business requirements for this Modification Proposal. It provides detailed information on the business requirements for the Proposed Solution agreed by the Proposer, with input from the Data Communications Company (DCC) and Sub-Committees. It also provides the considerations and assumptions for each business requirement with respect to this Modification Proposal.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	Incorporation of Non Great Britain Companion Specification (GBCS) Non Mandated (NGNM) Alerts, included, into GBCS (non DCC).
2	DCC to make consequential changes to Parse and Correlate.

Table 1 below shows the NGNM Alerts Register held on the SEC website (<https://smartenergycodecompany.co.uk/the-developing-sec/>). Subject to review additional NGNM Alerts may be added to the Register and shall also be covered by this Modification Proposal. The final list of NGNM Alerts targeted for inclusion in GBCS will be established at the time the Final Assessment is carried out by the DCC. Table 1 will be updated accordingly.

Event / Alert Code	Event / Alert Code Name	Trigger conditions
0x81C7	Over Current Level 2	Current over 120% of the I _{max} rating for more than 20 minutes
0x81C8	Over Current Level 2 L1	Current over 120% of the I _{max} rating for more than 20 minutes in phase L1
0x81C9	Over Current Level 2 L2	Current over 120% of the I _{max} rating for more than 20 minutes in phase L2
0x81CA	Over Current Level 2 L3	Current over 120% of the I _{max} rating for more than 20 minutes in phase L3
0x81CB	Bridged terminals	Bridged terminals are detected
0x81CC	Ultrasonic A flag start	A flag present
0x81CD	Ultrasonic A flag stop	A flag cleared
0x81CE	Ultrasonic B flag start	B flag present
0x81CF	Ultrasonic B flag stop	B flag cleared
0x81D0	Ultrasonic C flag start	C flag present
0x81D1	Ultrasonic C flag stop	C flag cleared
0x81D2	Battery 3% Alert	Battery very low alert (3%)

Table 1 List of current Non GBCS Non-Mandated Alerts

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

These Alerts are already in use, being sent from Devices to DCC Users, and are sent in GBCS format.

2.2 Requirement 1: Incorporation of Non-GBCS Non Mandated Alerts, included, into GBCS (non DCC)

The list of Non GBCS Non Mandated Alerts should be incorporated into table 16.2 of GBCS. These Alerts are already in a GBCS compliant format.

2.3 Requirement 2: DCC to make consequential changes to Parse and Correlate

Consequential changes will need to be made to Parse and Correlate software to allow DCC Users to receive identification information about the Alerts. This requirement is to ensure that the Alert is immediately identifiable by the DCC User as to what it means, not just the Alert Code. This Requirement is not to make the Alerts configurable.

3. Solution option

Following the responses to the July 2020 Refinement Consultation, where the DCC provided three solution options to facilitate the incorporation into the Smart Energy Code (SEC), the Proposer agreed that the Proposed Solution should be to incorporate the Alerts into GBCS, implementing supporting technical changes (P&C), but not make the Alerts configurable.

4. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
GBCS	Great Britain Companion Specification (SEC Schedule 8)
NGNM Alerts	Non GBCS Non Mandated Alerts
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat

SEC Modification Proposal, SECMP0090, DCC CR1341

**Incorporation of Non GBCS Non-Mandated Alerts
into the SEC**

Full Impact Assessment (FIA)

Version:	0.1
Date:	18th August, 2020
Author:	DCC
Classification:	DCC PUBLIC

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1 Document History

1.1 Revision History

Revision Date	Revision	Summary of Changes
18/08/2020	0.1	Initial version

1.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	MP090 Business Requirements-v1.1	SECAS	1/04/2020
2	SECMP0090 CR1257 Preliminary Impact Assessment	DCC	11/05/2020

References are shown in this format, [1].

1.3 Document Information

The Proposer for this Modification is Emslie Law of SSE. The original proposal was submitted in October 2019.

The Preliminary Impact Assessment (PIA) was requested of DCC on 20th November 2019. Subsequently the requirements were updated to reflect the need to include the alerts in GBCS, but to not make them configurable in a simpler solution. This request was sent to DCC on 16th April, 2020, and the revised PIA [2] submitted on the 11th May 2020.

The Working Group elected to use the Option 2 solution approach described following. Because of the nature and magnitude of the change it was not deemed necessary to request and compile a complete Full Impact Assessment. As a result this is a brief overview of the planned solution with full costs and durations provided.

2 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated. The text in this section is copied verbatim from the PIA [2].

2.1 Current State

Non GBCS Non-Mandated (NGNM) Alerts are Alerts that are built into Devices by Device manufacturers. These conform to GBCS formats but are not included in GBCS.

Suppliers and manufacturers have a general (but non regulatory) responsibility to ensure all Alerts supported by their Devices beyond those specified in the SEC are captured in the Non-GBCS Non-Mandated Alerts Register on the SEC Website until they are adopted into the SEC.

Many DCC Users only recognise Alerts defined in the Great Britain Companion Specification (GBCS) as when the Smart Metering Implementation Programme (SMIP) was in its infancy, Alerts that were not defined in the GBCS were not expected to be in use such that DCC Users' systems have not been designed to recognise Non GBCS Non-Mandated Alerts.

2.2 What is the Issue?

As these are currently not included in GBCS, the Parse and Correlate software provides the Alert code but does not provide a description of the problem the Alert is communicating. Suppliers therefore receive Alerts but are unable to identify the reason for them. Whilst Suppliers could access this information from the SEC website, this would be manual and labour intensive. Alternatively, each Supplier could amend their systems to incorporate the Alert codes from the SEC website, but this would involve a large number of individual system changes.

Additionally, whilst a Supplier may know which NGNM Alerts to expect from meters and Devices installed by themselves, they will continually inherit meters and Devices for which they were not the original installer and will be unaware of NGNM Alerts on Devices that have 'churned' to them.

Depending on the individual Alert either the Supplier or the Network Operator can configure the Alerts by setting them on or off according to their business needs. In order to make NGNM Alerts configurable these must be included in GBCS Table 16.2 and must be added to the DCC User Interface Specification (DUIS) Schema. As things stand, Suppliers and Network Operators receive large numbers of Alerts which have no description and which they are not able to stop receiving.

As currently designed, Suppliers and Network Operators will receive large numbers of Alerts which have no description and which they are not able to stop receiving. In order to make NGNM Alerts configurable these must be included in GBCS Table 16.2 and must be added to the DCC User Interface Specification (DUIS) Schema.

Note that the configurability mentioned above is part of Business Requirement #3, and would not be included in the simplest solution proposed.

2.3 Business Requirements for this Modification

This section contains the considerations and assumptions for each business requirement as provided by the Proposer and SECAS.

Req.	Requirement
1	Incorporation of Non GBCS Non Mandated Alerts into GBCS.
2	DCC to make consequential changes to Parse and Correlate
3	DCC to make consequential changes for the Non GBCS Non Mandated Alerts, included, to DUIS

Table 1: Business Requirements for SECMP0090, CR1257

2.3.1 Req. 1: Incorporation of Non-GBCS Non Mandated Alerts into GBCS

The list of Non GBCS Non Mandated Alerts shall be incorporated into table 16.2 of GBCS. These Alerts are already in a GBCS compliant format. By itself this is a document-only impacting change.

2.3.2 Req. 2: DCC to make consequential changes to Parse and Correlate

For this requirement, consequential changes will need to be made to Parse and Correlate (P&C) software to allow DCC Users to receive identification information about the Alerts.

2.3.3 Req. 3: DCC to make consequential changes for the Non GBCS Non Mandated Alerts, included, to DUIS

For this requirement, consequential changes will need to be made to DUIS. Those Alerts that are configurable should be set as configurable. Configurable Alert Codes begin either with 0x80 and can be configured by the DNO (Distribution Network Operator), or begin with 0x81 and can be configured by the Supplier; Alert Codes beginning with 0x8F are not configurable. This is with the exception of '0x81D2 – Battery 3% Alert' which should not be configurable.

3 Description of Solutions

The solution requested by SECAS is for the DCC is to design a solution to facilitate the incorporation into the SEC of currently Non GBCS Non Mandated Alerts listed in the SECMP0090 business requirements.

SECAS and the Working Group requested three solutions options to be provided for the PIA:

1. Incorporate the alerts, but not implement any supporting technical changes
2. Incorporate the alerts, implement supporting technical changes, but not make them configurable
3. Incorporate the alerts, implement supporting technical changes, and setting the alerts as configurable

Option 1 to incorporate but not support would leave the SMIP out of synchronisation with the Smart Metering System as a whole, so was not evaluated. Both the remaining two options were evaluated in the PIA [2], and Option 2 was selected for progression in the FIA.

3.1 Option 2: Incorporate and Support

Incorporation of these changes will help the Service Users to identify the NGNM Alerts, but will not make the alerts configurable.

3.1.1 Critical Software Changes

The changes required to implement this Option will affect the SMITEn parse services requiring the following effort:

- Upgrade to new version of P&C
- Add system-test to validate parsing of new alerts
- Release new version of SMITEn Lite

3.1.2 DSP Solution Overview

For the DSP, this is equivalent to the effort and duration usually associated with a DCC small change. This change requires DSP to update the Service User Simulator (SUS) to incorporate the latest P&C software.

The activities will include:

- Liaison with Critical software to receive revised P&C software release.
- Goods-in processing of new release.
- Integration of new P&C software release with DSP Service User Simulator software
- Integrate Java .JAR files and test
- System testing
- Testing in SIT, UIT

No updates to any specification or design documents are required, but there is a dependency on Critical P&C software.

4 Implementation Timescales and Approach

Notwithstanding in which release this change is implemented, based on the currently stated requirements, the elapsed time for implementation will be approximately 3 months from project initiation through to completion.

Implementation of this change is assumed to follow a waterfall methodology. The timing of this Modification release will be tied to an appropriate SEC release and the timing of each application phase will be tied to the application phases dictated by any larger changes.

The Modification will include release based regression testing in SIT and UIT.

5 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal. In this case, only two Service Providers are impacted, and the costs have been given as a total overall cost.

	Design, Build, Test	Total £
Option 2	17,000	17,000

Implementation and Application Support costs will be between nil and minimal, and would be absorbed by other Modifications or Change Requests in the associated SEC Release.

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
CR	DCC Change Request
DCC	Data Communications Company
DNO	Distribution Network Operators
DSP	Data Service Provider
DUIS	DCC User Interface Specification
ESME	Electricity Smart Metering Equipment
FIA	Full Impact Assessment
GBCS	Great Britain Companion Specification
GSME	Gas Smart Metering Equipment
NGNM	Non GBCS Non-Mandated (GBCS Alerts)
PIA	Preliminary Impact Assessment
P&C	Parse and Correlate
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMIP	Smart Metering Implementation Programme
SP	Service Provider
UIT	User Integration Testing

Appendix B: Current GBCS Non-Mandated Alerts

The table below lists the Non GBCS Non Mandated (NGNM) Alerts Register held on the SECAS website (<https://smartenergycodecompany.co.uk/the-developing-sec/>). Subject to review, additional NGNM Alerts may be added to the Non GBCS Non Mandated Alerts Register and shall also be covered by this Modification.

Event/ Alert Code	Event/ Alert Code Name	Trigger conditions	Known Remote Party Role	ESME/GSME Event/Alert Configuration Responsibility
0x81C7	Over Current Level 2	Current over 120% of the I _{max} rating for more than 20 minutes	Supplier	Supplier
0x81C8	Over Current Level 2 L1	Current over 120% of the I _{max} rating for more than 20 minutes in phase L1	Supplier	Supplier
0x81C9	Over Current Level 2 L2	Current over 120% of the I _{max} rating for more than 20 minutes in phase L2	Supplier	Supplier
0x81CA	Over Current Level 2 L3	Current over 120% of the I _{max} rating for more than 20 minutes in phase L3	Supplier	Supplier
0x81CB	Bridged terminals	Bridged terminals are detected	Supplier	Supplier
0x81CC	Ultrasonic A flag start	A flag present	Supplier	Supplier
0x81CD	Ultrasonic A flag stop	A flag cleared	Supplier	Supplier
0x81CE	Ultrasonic B flag start	B flag present	Supplier	Supplier
0x81CF	Ultrasonic B flag stop	B flag cleared	Supplier	Supplier
0x81D0	Ultrasonic C flag start	C flag present	Supplier	Supplier
0x81D1	Ultrasonic C flag stop	C flag cleared	Supplier	Supplier
0x81D2	Battery 3% Alert	Battery very low alert (3%)	Supplier	Not possible

Table 2: List of current Non GBCS Non-mandated Alerts

These alerts are already in use, being sent from devices to DCC Users, and are sent in GBCS format. They should be incorporated into GBCS and the Parse and Correlate application to enable DCC Users to identify them and in DUIS for configurable Alerts.

Configurable Alert Codes begin either with 0x80 and can be configured by the DNO (Distribution Network Operator), or begin with 0x81 and can be configured by the Supplier; Alert Codes beginning with 0x8F are not configurable.

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MP090 ‘Incorporation of Non GBCS Non-Mandated Alerts into the SEC’ Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP090 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes	We note that the proposal contains a number of options for dealing with NGNM alerts offering different levels of functionality and associated costs. We agree with the working group assessment that the preferred option is Alternative Solution 1 and that Alternative Solution 2 which is significantly more expensive has no supporting business case for making that change.
Western Power Distribution	Networks Party	Yes	The three solutions detailed in the Modification Report seem appropriate and would address the issue raised.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	We agree with the solutions proposed.

Question 2: Will there be any impact on your organisation to implement MP090?

Question 2			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes*	Dependent upon the solution chosen for dealing with NGNM alerts. If Alternate proposal 2 is chosen, then additional changes to user systems will be required to allow the enablement/disablement of NGNM alerts. There is however no impact from either the original proposal or Alternate proposal 1
Western Power Distribution	Networks Party	Yes	Depending on which solution is implemented will depend how much impact to our organisation. The impact would vary from minimal to system changes to allow the alerts to be configured.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	Any change to GBCS requires us to make changes to how our systems process the data it receives.

Question 3: Will your organisation incur any costs in implementing MP090?

Question 3			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes*	<p>Dependent upon the solution chosen for dealing with NGNM alerts. If Alternate proposal 2 is chosen then additional changes to user systems will be required to allow the enablement/disablement of NGNM alerts, cost are estimated in the region of up to £50k but will be dependent upon the final DCC design changes. There is however no impact from either the original proposal or Alternate proposal 1.</p> <p>There are no direct costs savings from any of the proposed solutions, Alternate solution1 will make day to day operational activities easier as there will be no need to look up/remember alert codes/descriptions as they will always be available within the message content.</p> <p>Alternation solution 2 would allow parties to turn off any alerts which were deemed as 'nuisance' (similar to the 8014/8015 nuisance alert issue which threatened to overload DCC and user systems). We note however that SECMP0062 has been approved to provide alert storm protection to DCC systems and as such should help mitigate any future issues.</p>
Western Power Distribution	Networks Party	Yes	Again, depending on the solution chosen the costs will vary so it is difficult to provide estimated costs at this time.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	These are minimal and not impacted by our desire to make the changes.

Question 4: Do you believe that MP090 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes	The modification would better facilitate SEC objective (a) as it supports the efficient provision, installation and operation, as well as interoperability of Smart Metering Systems. The implementation of NGNM alerts into the GBCS would ensure DCC Users' systems can recognise these alerts without requiring further individual development.
Western Power Distribution	Networks Party	Yes	We believe that this modification will better facilitate SEC Objective (a) ensuring the efficient operation of the Smart Energy Systems as the DCC and User systems will be able to recognise these alerts.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	Yes, we believe this will better facilitate SEC Objective (a) as set out in the Modification Report.

Question 5: Noting the costs and benefits of this modification, do you believe MP090 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes*	We agree with Alternate solution 1. We do not agree with Alternate solution 2 at this time noting that the high DCC costs are not supported by any business case benefits and that as noted in question3 SECMP0062 will provide DCC with mitigation for dealing with future alert storms. Implementing Alternate solution 1 does not preclude Alternate solution2 being raised in its own right at a later date, should it become necessary.
Western Power Distribution	Networks Party	Yes	We believe, based on the costs and benefits, that only Alternative Solution 1 is viable for approval. We believe the Proposed Solution would not address the issue and Alternative Solution 2 does not have a benefit case to justify the implementation costs.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	We believe the benefits outweigh the costs so this should be approved.

Question 6: If MP090 is approved, which solution do you believe should be implemented?

Question 6			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Alternative Solution 1	Alternate solution 1 will provide parties with a consistent interface meaning DCC Users' systems can recognise these alerts without requiring further individual development. For the avoidance of doubt we do not support the implementation of Alternate solution 2 due to the high DCC costs and lack of supporting business case.
Western Power Distribution	Networks Party	Alternative Solution 1	We believe the Proposed Solution would not address the issue and Alternative Solution 2 does not have a benefit case to justify the implementation costs. Alternative Solution 1 addresses the issue identified and has reasonable costs.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Alternative Solution	It would make the most sense, based on the cost presented and the additional data provided to assist impacted User that Alternative Solution 1 is the best of the 3 options described.

Question 7: How long from the point of approval would your organisation need to implement MP090?

Question 7			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	0-6 months dependent upon the chosen option	The original proposal and Alternate solution 1 would have no impact. Alternate solution 2 would require system development in order to configure the enablement/disablement of the NGNM alerts
Western Power Distribution	Networks Party	12 months	If either of the Alternative Solutions is chosen there is a system impact and therefore we would like a 12 month lead time.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	We would align the implementation with the deliver of the GBCS changes.	As above.

Question 8: Do you agree with the proposed implementation approach?

Question 8			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes	n/a
Western Power Distribution	Networks Party	Yes	We agree with the proposed implementation approach as it will allow enough time for system changes.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	Although this is a small change and was always part of the solution that NGNM could be raised and uplifted into GBCS, it is disappointing that it will still take over a year to deliver the changes to implement this.

Question 9: Do you agree that the legal text will deliver MP090?

Question 9			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party		Not reviewed
Western Power Distribution	Networks Party		There was no legal text included in the refinement consultation.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	Yes	

Question 10: Do you believe there will be any impacts on or benefits to consumers if MP090 is implemented?

Question 10			
Respondent	Category	Response	Rationale
Electricity North West Limited	Networks Party	Yes	Whilst there are no direct benefits accruing to customers the adoption of NGNM alerts into the SEC will standardise the governance of alerts and provide DCC Users with a common framework covering both mandated and non mandated alerts.
Western Power Distribution	Networks Party	Yes	There is the potential that consumers might benefit from this as DCC Users will be aware of what these alerts are and can act accordingly.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	No	Unsure there would be any direct impacts or benefits to the end consumer.

Question 11: Please provide any further comments you may have

Question 11		
Respondent	Category	Comments
Electricity North West Limited	Networks Party	n/a
Western Power Distribution	Networks Party	This modification addresses the current NGNM Alerts, however we think it would be good to understand what the enduring solution is for any new NGNM alerts that might be developed in the future.
OVO (S) Electricity Ltd; OVO (S) Gas Ltd	Large Supplier	None