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MP107 'SMETS1 Validation of SRV 6.15.1'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP107 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	No	<p>The consultation is unclear as to the actual scale of the problem and the document itself states “The impact is currently low due to the way that SMETS1 Devices are migrated and the Network Operator Certificates validated on migration”.</p> <p>The DCC should be required to scale the current problem to ascertain whether there is an actual business benefits case for spending £200k to remediate this and also to advise what mitigating steps can be taken to ensure the problem does not escalate further.</p> <p>We request quantitative analysis to be included in the consultation.</p>
WPD	Network Party	Yes	We agree with the solution being put forward.
EdF	Large Supplier	Yes	We have no comments on the solution.
Centrica	Large Supplier	Yes	The solution appears appropriate and proportional to the issue.
Scottish Power	Large Supplier	Yes	We agree that this will help DNOs to maintain the SMETS1 estate. There is no immediate impact to Suppliers.

Question 2: Will there be any impact on your organisation to implement MP107?

Question 2			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	We first request a quantitative analysis to be included in the consultation before we can answer if this modification with impact us or not.
WPD	Network Party	Yes	This modification would enable us to correct certificates, where our certificates have been placed on a device that is not in our area.
EdF	Large Supplier	No	We do not anticipate any impacts as a result of this change, as it does not relate to SRs used by suppliers and would not result in a new version of DUIS.
Centrica	Large Supplier	No	There is no implementation effort or impact on business processes.
Scottish Power	Large Supplier	No	-

Question 3: Will your organisation incur any costs in implementing MP107?

Question 3			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	We first request a quantitative analysis to be included in the consultation before we can answer if this modification with incur costs or not.
WPD	Network Party	No	There will be no additional costs to us beyond the implementation costs.
EdF	Large Supplier	No	-
Centrica	Large Supplier	No	No implementation or operational effort / costs.
Scottish Power	Large Supplier	No	-

Question 4: Do you believe that MP107 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	No	<p>The consultation is unclear as to the actual scale of the problem and the document itself states “The impact is currently low due to the way that SMETS1 Devices are migrated and the Network Operator Certificates validated on migration”.</p> <p>The DCC should be required to scale the current problem to ascertain whether there is an actual business benefits case for spending £200k to remediate this and also to advise what mitigating steps can be taken to ensure the problem does not escalate further.</p> <p>We request quantitative analysis to be included in the consultation.</p>
WPD	Network Party	Yes	<p>We believe that this modification will better facilitate SEC Objective (a) by ensuring that smart metering systems can be operated by the correct Network Operator. We also believe that this modification will better facilitate SEC Objective (c) by ensuring that this information from the smart metering systems is provided to the correct Network Operator</p>
EdF	Large Supplier	Yes	<p>We agree with the Proposer that this change would better facilitate SEC Objectives (a) and (c).</p>
Centrica	Large Supplier	Yes	<p>We agree that this Modification better facilitates SEC Objective (a) by ensuring smart metering systems can be operated by the correct Network Operator.</p> <p>However, we do not believe this Modification better facilitates SEC Objective (c) as implementation will not Facilitate energy consumers’ management of their use of electricity and gas through the provision of appropriate information via smart metering systems.</p>
Scottish Power	Large Supplier	Yes	<p>The MOD will allow the more efficient operation of the Smart Metering Infrastructure.</p>

Question 5: Noting the costs and benefits of this modification, do you believe MP107 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	No	We first request a quantitative analysis to be included in the consultation before we can answer if this modification with impact us or not.
WPD	Network Party	Yes	-
EdF	Large Supplier	No	While we agree with the principle of this change there is no evidence that the benefits to Network Operators of making this change would outweigh the costs. There is no direct benefit to suppliers of making this change so we would need to be sure that there is a positive benefits case before we could support this change.
Centrica	Large Supplier	Yes	We believe the relatively low DCC cost of implementation is outweighed by the benefits to Network Operators (subject to DNO confirmation that it is cost effective to do so).
Scottish Power	Large Supplier	Yes	-

Question 6: How long from the point of approval would your organisation need to implement MP107?

Question 6			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	-
WPD	Network Party	N/A	We do not have any additional changes to make and therefore do not require any lead time.
EdF	Large Supplier	0	We would not expect to implement any changes as a result of MP107.
Centrica	Large Supplier	N/A	N/A
Scottish Power	Large Supplier	N/A	-

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

Question 7			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	-
WPD	Network Party	Yes	We believe that this modification needs to be implemented as soon as possible.
EdF	Large Supplier	Yes	-
Centrica	Large Supplier	Yes	The implementation approach appears sensible based on the level and scope of change required.
Scottish Power	Large Supplier	Yes	-

Question 8: Do you agree that the legal text will deliver MP107?

Question 8			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	-
WPD	Network Party	-	There is no legal text provided
EdF	Large Supplier	N/A	No legal text was provided.
Centrica	Large Supplier	N/A	We have not reviewed legal text
Scottish Power	Large Supplier	Yes	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP107 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Electricity North West	Network Party	-	-
WPD	Network Party	Yes	Consumers will benefit from the correct Network Operator being able to communicate with their device to help when triaging network issues and considering reinforcement requirements.
EdF	Large Supplier	Yes	If the wrong Network Operator credentials are associated with a meter then correct Network Operator will not be able to obtain/receive data from that meter and deliver and associated benefits to consumers.
Centrica	Large Supplier	Yes	There may be marginal benefits to consumers from implementation in terms of efficient operation of DNOs' networks and in turn lower costs to consumers.
Scottish Power	Large Supplier	Yes	The MOD will allow DNOs to service SMETS1 meters more efficiently.