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

## About this document

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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