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MP078 'Incorporation of multiple Issue Resolution Proposals into the SEC - Part 2'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP078 Refinement Consultation.

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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	We have not reviewed IRP 550, IRP 306 or IRP 604 as they have no impact on us so are neutral to this.
OVO	Large Supplier	Yes, in principle.	These gaps need to be corrected to ensure robustness of the specification.

Question 2: Will there be any impact on your organisation to implement MP078?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	No	IRP 550, IRP 306 or IRP 604 have no impact on Electricity Distributors.
OVO	Large Supplier	Yes	Potentially- IRP603 and IRP604/550 may require additional firmware for Devices where they are not compliant to these current gaps. This could necessitate further testing from a User perspective. Impact is most concerning with IRP603, as if CHs are not currently compliant to this then our testing volume rises exponentially. Changes to SMETS and GBCS would have to be understood and further work with our meter providers would be required to produce firmware that adheres to the new specifications.

Question 3: Will your organisation incur any costs in implementing MP078?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	No	
OVO	Large Supplier	Yes	Yes we will incur cots as a result of the testing mentioned in Q2. Furthermore, we note that new firmware will incur costs around testing, piloting and deployment.

Question 4: Do you believe that MP078 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	Yes	Facilitates objectives and effectively.

Question 5: Noting the costs and benefits of this modification, do you believe MP078 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	Costs require further review	The costs quoted are not clear as to whether these include IRPs 554 and 582, which this consultation has sought to move into MP098. The DCC document states IRPs 550, 554, 582 and 603 as being included in the costing, and the consultation still quotes this figure despite seeking to remove 554 and 582- which we note have the largest impact for DCC. As noted by Telefonica in Section 7.3 of Annex B to this SECMP, the quoted costs would be significantly lowered if implemented with a major release incorporating these IRPs. Since MP078 would now only include IRP550 and IRP603- both which we are currently living with and neither of which have significantly detrimental impacts- we may make more efficient use of resources if the DCC-requirements of these IRPs are also rolled into MP098

Question 6: How long from the point of approval would your organisation need to implement MP078?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	No comment	This is dependent on firmware changes required, which would then require testing from our perspective. It would also depend on how long our manufacturers will take to develop compliant firmware.

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

Question 7			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	Yes but timing needs to be addressed.	The implementation is sound, however the timing of when this is implemented could be better improved to minimise on cost.

Question 8: Do you agree that the legal text will deliver MP078?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	No comment	This will only deliver MP078 provided all manufacturers are currently adhering to the behaviour described in MP078, which we cannot fully comment on.

Question 9: Do you agree with removing IRP554 and IRP582 from MP078 and incorporating them into MP098?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	Yes	Whilst we agree with the proposal to remove IRP554 and IRP582, we cannot see them detailed anywhere in MP098. We are concerned that because they are not detailed within MP098 that they might get omitted, either in their entirety or parts of the solution. Please can MP098 be updated and republished to include these IRPs, or if they are now referred to as something else can this be clarified?
OVO	Large Supplier	Yes	No comment.

Question 10: Do you agree with implementing the legal text drafting from MP078 to the current Principal Versions of the Technical Specifications as a Sub-Version, and as a Sub-Version to the next Principal Version?

Question 10			
Respondent	**Category**	**Response**	**Rationale**
Western Power Distribution	Network Party	N/A	See response to Question 1.
OVO	Large Supplier	Yes	No comment.

Question 11: Do you agree with including IRP604 in MP078?

Question 11		
Respondent	**Category**	**Rationale**
Western Power Distribution	Network Party	See response to Question 1.
OVO	Large Supplier	Yes- IRP604 should be implemented in conjunction with IRP550.

Question 12: Please provide any further comments you may have

Question 12		
Respondent	**Category**	**Comments**
Western Power Distribution	Network Party	
OVO	Large Supplier	We would encourage caution in the implementation of IRP582 to ensure it does not conflict or become nullified by changes brought in by the introduction of Proportional Load Control devices, and the proposed changes to existing ALCS/HCALCS devices as part of this.