

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

SECMP0015 ‘GPF timestamp for reading instantaneous Gas values’ Conclusions Report – version 2.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to recommend the Authority **approves** SECMP0015. It believed the modification better facilitates SEC Objectives (a)¹ and (c)².

Modification Report Consultation

SECAS received three responses to the Modification Report Consultation. The majority of respondents believe the modification should be approved. They considered the modification better facilitated SEC Objectives (a) and (c).

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

² Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Modification Report Consultation responses

Summary of responses

There were three responses to the SECMP0015 Modification Report Consultation. All three of the respondents were Large Supplier parties. There were two votes to approve and one to reject. The reasons given for supporting the modification was that it would support meter triage, that it would improve the outcome for consumers in terms of billing and from a business perspective would improve customer data accuracy. The respondent voting to reject stated they were supportive of the intent of the solution, but believed the cost cited for implementing the solution undermines the business case and couldn't justify supporting it.

Comments on the solution cost

The single respondent believing the modification should be rejected did this on the grounds that the cost of the Modification Proposal would outweigh potential savings and improvement of service to the consumer.

The other two respondents, whilst voting to approve, acknowledged they had issues with the cost of the solution. One stated that they wanted the DCC to provide information on how a cost saving could be achieved in the testing phase to reduce the current figure of £4.6 million by using actual Devices rather than emulators. The other respondent made clear that this needed to be discussed prior to being progressed and stating that the cost for this change as it stands was far outside their expectation.

SECAS is seeking further information from Users on these points. A verbal update will be given at the meeting to cover User's comments on the business case when considering the industry cost, individual User cost and any savings that Users will make if the Modification Proposal were to be approved.

Comments and additional information from the DCC

The DCC raised a number of comments on the Modification Report and legal text during the Modification Report Consultation. The comments are summarised below:

- The DCC believed references in the legal text would need amending due to being measured against older versions of the SEC.
- It was mentioned that there should be an impact on Schedule 11 by adding end date for the old specification and a start date for the new specification so there is an obligation on the DCC and Gas Smart Metering Equipment (GSME) manufacturers to implement the changes.
- The DCC believe the changes to the DCC System made under this modification need to be forward compatible.
- The DCC wasn't sure from the text provided how the Communications Hubs would work with the GSME and the In-Home Display (IHD).
- The DCC wanted a clarification that Smart Metering Equipment Technical Specifications (SMETS) 1 Devices will not support the functionality in this Modification Proposal, but could later on request alignment of SMETS1 and SMETS2 behaviour.

In line with these comments, the legal text has been revised to accommodate these changes and clarifications to the technical specifications and note an impact on SEC Schedule 11. It was noted that a definition in the MMC already exists that acknowledges the Proposed Solution will only affect SMETS2 in Section 1.4, and that this guidance should be pointed out to Users.

Original Change Board vote and subsequent referral

The Change Board voted to reject SECMP0015 under Self-Governance on 22 July 2020. Members agreed that the proposed solution would better facilitate SEC Objectives (a) and (c) by helping to provide relevant and accurate information to consumers through timestamping the use of their GSME. However, the majority of members did not believe the benefits the solution would bring would outweigh the £4.6m central implementation costs. Consequently, the Change Board voted to reject the modification.

British Gas believed it is right that industry representatives questioned such costs of SEC modifications. However, it considered the Change Board's decision should have been based on whether it better facilitated the SEC Objectives. British Gas believed there was merit in the proposal being implemented and considered it would better facilitate the SEC Objectives. It subsequently referred the Change Board's decision to the Panel.

The SEC Panel subsequently voted to approve the modification on 14 August 2020, with members in support of approval agreeing the solution would better facilitate SEC Objectives (a) and (c). The members who disagreed and voted to uphold the Change Board's previous decision felt it would not be efficient to implement these changes for the costs quoted. British Gas further referred this decision to the Authority on 28 August 2020.

Authority send-back

Following the appeal by British Gas SECMP0015 was sent back by the Authority in September 2020. In its direction, Ofgem requested that the assessment of the costs and benefits of SECMP0015 be laid out clearly and succinctly, including the reason for the increase in costs between Preliminary Assessment and Impact Assessment.

This work has been completed and the updated Modification Report is ready to be returned for decision. The previous Change Board vote was nullified by the send-back. Also, as the Refinement Consultation carried out as part of the further assessment only closed on 4 December 2020, with three of the four respondents in support, the Panel agreed there was no benefit in re-issuing SECMP0015 for Modification Report Consultation. It therefore submitted the Modification Report directly to the Change Board to redo the vote. After that the vote, the report and the Change Board's recommendation will be returned to the Authority for decision.

Following the send back the DCC performed a further analysis of the costs of implementing the modification within a SEC Release, specifically the June 2022 SEC Release, rather than as a stand-alone release. This release was chosen as it allowed a sufficient amount of lead time for the modification and system changes required and also will implement the Communications Service Provider (CSP) firmware updates for [SECMP0007 'Firmware updates to IHDs and PPMIDs'](#). SECMP0007 will implement the functionality to update the firmware on PPMIDs which will in-part allow SECMP0015 to be implemented.

The updated analysis of the costs was shared with the Working Group. The costs were reduced but the Working Group still had some concerns about the cost of the modification. SECAS issued a

second Refinement Consultation to gather more evidence for the business case. The Modification Report has been updated with both the analysis of the costs and the updated business case.

Change Board vote

Change Board vote

The Change Board voted to recommend SECMP0015 be **approved** by the Authority.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	4	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

Views against the General SEC Objectives

Objective (a)

The majority of Change Board believed that SECMP0015 will better facilitate SEC Objective (a) by reducing billing, direct debit, PPMID and settlement imbalances and issues.

Objective (c)

The Change Board unanimously believed that SECMP0015 will better facilitate SEC Objective (c) by enabling a Supplier to know if the information is out of date.

Change Board discussions

One Change Board member questioned if the scale of the issue and whether there was a material need for change had been established. SECAS had already explained that there was no way to establish the scale of the issue affecting Pre-payment meter customers as a consumer would not be aware of this issue. Even when calling customer services, it would be impossible to diagnose this issue as the problem.

The same Change Board member questioned if this is also an issue in SMETS1 and if it was omitted from SMETS2 for a reason. SECAS explained that several functions of SMETS1 had been omitted from SMETS2 accidentally. Another Change Board member stated some functionality has been omitted because practically it was too difficult to implement. Following the meeting the SECAS Technical Lead confirmed that in SMETS1 Gas Smart Metering Systems (where there is no GPF

function) are obliged to have the valid time stamp on the consumption data regardless of how the data is stored.