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MP144 ‘Charging of Random Sample Privacy Assessments’

Annex B

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP144 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes and No	We believe that the modification identifies the issue as RSPA costs being socialised. If this is the issue then we believe that the proposed solution directly addresses this issue and the alternative solution only partially address this issue.	
Electricity North West Limited	Network Party	Yes	The proposed solution will bring RSPAs in line with the other privacy assessment types so that they are all paid by the individual User, rather than as a socialised cost across industry.	
Haven Power	Small Supplier	Yes	When the current arrangements were written into the SEC, the costs socialised for Random Sample Privacy Assessments (RSPAs) were minimal. However, as the rollout has accelerated, the number of RSPAs undertaken by Other Users has increased and will continue to do so. It's right that these costs are allocated fairly and RSPAs are brought into line with other privacy assessments which are paid for by the User undertaking the assessment.	
Hildebrand Technology Ltd	Other SEC Party	No	The Other User role has yet to be proven as commercially viable but brings value to industry as a whole by facilitating access to consumption data for research projects and other explorations into the value of smart	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>meter data on behalf of consumers for organisations like BEIS, Gemserv, etc. who are studying this area. It also offers suppliers support with transparency on issues like tariffs loaded on meters (not all have this service via their adaptor).</p> <p>The role is already expensive to maintain in light of SECAS' annual Audit fees for both Security and Privacy in addition to DCC connectivity costs; this will be further cost to absorb with no benefit to the Other User.</p> <p>We recommend that the cost of the Random Audit continues to be distributed across industry for one or two more years until the Other User role is better proven.</p>	

Question 2: Will there be any impact on your organisation to implement MP144?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No		
Electricity North West Limited	Network Party	No		
Haven Power	Small Supplier	No	Other than a beneficial reduction in SEC charges, we do not expect the implementation of MP144 to impact our organisation.	
Hildebrand Technology Ltd	Other SEC Party	Yes	The cost is not quantified in the proposal other than total costs to industry across an unknown number of RSPA; we have no guidance on whether costs will be higher than the Privacy Assessment and we therefore assume costs will be higher. We appreciate that costs will be affected by level of preparedness – but previous experience with Security Audits demonstrates that even being commended for excellent preparation does not translate to fees being on the lower side of the spectrum.	

Question 3: Will your organisation incur any costs in implementing MP144?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	We will benefit by either not having or paying reduced RSPA costs.	
Electricity North West Limited	Network Party	No		
Haven Power	Small Supplier	No		
Hildebrand Technology Ltd	Other SEC Party	Yes	Costs will be internal – time to automate scripts to provide responses and then management time. No cost savings are expected.	

Question 4: Do you believe that MP144 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (g) by aligning RSPA cost methodology with other User Privacy Assessment time and ensuring a consistency.	
Electricity North West Limited	Network Party	Yes	Yes we agree with the proposer that the General SEC objective (g) is bettered facilitated by the Modification Proposal by aligning the RSPA to the other User Privacy Assessment types and making the assessment cost methodology more consistent with the others.	
Haven Power	Small Supplier	Yes	We agree with the Proposer's view that MP144 would better facilitate General SEC Objective (g) – To facilitate the efficient and transparent administration and implementation of the SEC.	
Hildebrand Technology Ltd	Other SEC Party	No	Doesn't encourage organisations to become an Other User which is a role designed to support innovation around smart meter data and give consumers choice in connecting a range of third party devices to their meters – which also requires OU SRs.	

Question 5: Noting the costs and benefits of this modification, do you believe MP144 should be approved?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes		
Electricity North West Limited	Network Party	Yes		
Haven Power	Small Supplier	Yes	Whilst the current arrangements appear to have a relatively small impact on SEC party charges, if allowed to continue, parties will incur greater costs as the number of RSPAs increase. The estimated one-off cost to implement MP144 is justified on the basis that it addresses this distortion.	
Hildebrand Technology Ltd	Other SEC Party	No	See above.	

Question 6: How long from the point of approval would your organisation need to implement MP144?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	N/A		
Electricity North West Limited	Network Party	N/A		
Haven Power	Small Supplier	Drax requires no lead time after approval.	We will not incur any system or process changes as a result of this change.	
Hildebrand Technology Ltd	Other SEC Party	By the next audit that required RSPA which is unknown.		

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

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that this modification should be implemented in the next SEC Release after the approval.	
Electricity North West Limited	Network Party	Yes		
Haven Power	Small Supplier	Yes	We support the earlier implementation date of 24th June 2021 but accept implementation may have to be delayed until November if a decision to approve is received after 10th June.	
Hildebrand Technology Ltd	Other SEC Party	No	See above.	

Question 8: If MP144 is approved, which solution do you believe should be implemented?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Proposed Solution	The modification states that the issue is RSPA costs are being socialised amongst industry. The proposed solution is the only solution that completely addresses this issue.	
Electricity North West Limited	Network Party	Proposed Solution	This will bring RSPAs in line with the other privacy assessment types so that they are all paid by the individual User, rather than as a socialised cost across industry.	
Haven Power	Small Supplier	Proposed Solution	In our view the Proposed Solution is the fairest and most straightforward approach, bringing RSPAs in line with other privacy assessment types which are paid for by the individual user.	
Hildebrand Technology Ltd	Other SEC Party			

Question 9: Do you agree that the legal text will deliver MP144?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that the legal text for both solutions delivers the intent of that solution.	
Electricity North West Limited	Network Party			
Haven Power	Small Supplier	Yes	We have no comment on the legal text.	
Hildebrand Technology Ltd	Other SEC Party	No comment on legal text		

Question 10: Do you believe there will be any impacts on or benefits to consumers if MP144 is implemented?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No		
Electricity North West Limited	Network Party			
Haven Power	Small Supplier	No		
Hildebrand Technology Ltd	Other SEC Party	Yes	There is risk that adding further costs, that are out of the OU's control in many respects, makes a role which is already unproven commercially even less attractive.	

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party		
Electricity North West Limited	Network Party		
Haven Power	Small Supplier	No further comments	
Hildebrand Technology Ltd	Other SEC Party		