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MP117 ‘Bulk CH returns’

Annex D

Refinement Consultation responses

About this document

This document contains the full non confidential collated responses received to the MP117 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	<p>Considering the cost estimate provided by DCC, we believe this is too expensive to make sense from a cost-benefit analysis point of view. Given that we have an automated process to create service requests for each comms hub we return to DCC, there would be no time saving associated with a “bulk” process. As such, there is no real benefit to us from this approach.</p> <p>We understand this process is designed to deal with comms hubs which may not fall into normal operational processes (e.g. comms hubs in stock due to a recall). Even if we had to process these manually on a one-by-one basis, given the low likelihood of this happening and the low numbers of CH in stock likely to be involved, we believe that a manual process is likely to be more cost-effective than the cost involved in this modification.</p> <p>In addition, the fact that this service would not be available until the end of 2021 at the earliest means that we would not be able to realise the benefits during some of the busiest points in the smart meter rollout. As installation volumes decrease, we are likely to hold less stock, further decreasing the benefit of this modification.</p>
Utilita	Large Supplier	Yes	Being able to provide multiple Device IDs in one Service Request such that multiple CHs can be returned with one SRV is more efficient. Therefore, Utilita supports this modification.
EDF	Large Supplier	No	We do not see how the solution proposed would provide any material improvement in regards to enabling the bulk return of Comms Hubs. While it will allow one SRV to be sent for multiple Comms Hubs the amount of data that needs to be sent will be largely the same; it is not clear how making this change would provide any measurable benefit to the process for returning Comms Hubs.

Question 1			
Respondent	Category	Response	Rationale
OVO	Large Supplier	Yes	We agree with the solution proposed.

Question 2: Will there be any impact on your organisation to implement MP117?

Question 2			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	Changes to our systems will be required to allow us to include more than one CH device ID in a service request.
Utilita	Large Supplier	Yes	Implementation will require minor changes to be made to systems. The logistical benefits and efficiencies will likely make this worthwhile.
EDF	Large Supplier	Yes	We would need to upgrade our interface with the DCC systems to the new version of DUIS to be able to send SRVs in the revised format. We would need to make changes to our returns processes as well as changes to our back end systems to be able to collate the relevant data and send it in the new format.
OVO	Large Supplier	Yes	Yes although they are positive and we have no issue.

Question 3: Will your organisation incur any costs in implementing MP117?

Question 3			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	TBC
Utilita	Large Supplier		
EDF	Large Supplier	Yes	It is very difficult to isolate and identify the cost impacts of making any one change as this change will be one of many made as part of a wider SEC Release and new version of DUIS. We will incur a significant cost for moving to any new version of DUIS, the specific impacts associated with individual changes within any new version is incredibly difficult to identify. We would certainly not look to upgrade to a new version of DUIS specifically to implement these changes.
OVO	Large Supplier	Yes	As this is a DUIS change will would not be able to distinguish to cost specific to just this change in isolation from the suite of changes we'd expect to be delivered for a DUIS / DCC Release.

Question 4: Do you believe that MP117 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	<p>As we believe this modification proposal does not offer value for money, we do not believe that it facilitates the General SEC Objectives. In particular, it works counter to the first SEC Objective in that it reduces the efficiency of smart metering activities, and by spreading additional costs on all suppliers unnecessarily (whether they need this functionality or not) it works against the fourth SEC Objective.</p> <p>The General SEC Objectives also reference the General Objectives in the DCC Licence. Similarly, we believe that this solution is not cost effective and thus does not meet the requirements of these objectives.</p>
Utilita	Large Supplier	Yes	We believe MP117 better facilitates SEC Objective a – as it supports facilitating the efficient provision, installation, and operation of Smart Metering Systems
EDF	Large Supplier	No	There is no evidence that MP117 better facilitates any of the SEC Objectives, the additional functionality proposed in the solution would not seem to make any measurable improvement to the process for the bulk return of Comms Hubs.
OVO	Large Supplier	Yes	As described in the Mod report.

Question 5: Noting the costs and benefits of this modification, do you believe MP117 should be approved?

Question 5			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	As noted above, we do not believe the benefits of this modification justify the costs.
Utilita	Large Supplier	Yes	The benefits outweigh the costs.
EDF	Large Supplier	No	We have not been able to identify material benefits resulting from this change that would justify the significant costs associated with the DCC's changes.
OVO	Large Supplier	Yes	N/A

Question 6: How long from the point of approval would your organisation need to implement MP117?

Question 6			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	N/A	Given the limited benefits, E.ON would not choose to prioritise funding to implementation of the functionality provided in this modification
Utilita	Large Supplier		We note that as per the Mod Report, this solution would include a six-month lead time, with targeted Nov 2021 Release for implementation. This should provide sufficient time for implementation.
EDF	Large Supplier	6 months	We would require at least 6 months' notice for any changes to the DUIS.
OVO	Large Supplier	8 -12 months	Any DCC Release has a considerable lead time due to the nature of all the elements needing changing and the testing required.

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

Question 7			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	Noting our overall view on this modification, the implementation approach should this be adopted appears sensible.
Utilita	Large Supplier	Yes	We would like to have the solution available sooner than November 2021 but if it cannot be delivered until then we accept this.
EDF	Large Supplier	Yes	If approved this change should be included in the November 2021 SEC Release.
OVO	Large Supplier	Yes	We would uplift to the next version of DUIS as and when we are ready. The implementation approach support that.

Question 8: Do you agree that the legal text will deliver MP117?

Question 8			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	No legal text provided
Utilita	Large Supplier		
EDF	Large Supplier	No	We did not see any legal text to comment on.
OVO	Large Supplier	Yes	N/A

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP117 is implemented?

Question 9			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	Additional unnecessary costs to energy suppliers will increase the overall cost base and impact the opportunity to offer competitive prices.
Utilita	Large Supplier		
EDF	Large Supplier	No	It is not clear that there are any material benefits to be gained if MP117 is implemented.
OVO	Large Supplier	No	CH Returns to the DCC have no material impact to consumers.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
E.ON	Large Supplier	
Utilita	Large Supplier	
EDF	Large Supplier	
OVO	Large Supplier	Not at this time.