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MP138 ‘DCC Service Testing in ETAD’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP138 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	DCC has addressed our concerns around the costs so we no longer object to this Mod.	Noted.
EdF	Large Supplier	Yes – With caveats	From our understanding of the draft proposals for each of the four items, there appear to be no additional cost implications for SEC Parties, now or in the future. Providing DCC as the Modification proposer can confirm this is the case, then we see no reason why this proposal is should not be approved.	DCC can confirm that there will be no additional costs implications for SEC Parties. The proposed new Explicit Charges will facilitate DCC charging for new/additional costs to the relevant Parties.

Question 2: Will there be any impact on your organisation to implement MP138?

Question 2				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	No	-	
EdF	Large Supplier	No	-	

Question 3: Will your organisation incur any costs in implementing MP138?

Question 3				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	No	DCC has moved all costs (other than those already in place) to be explicit charges.	
EdF	Large Supplier	No	-	

Question 4: Do you believe that MP138 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	See individual comments against each quoted objective below	<p>1 Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain – EDF response – Only the efficient `operation` of Smart Metering Systems at Energy Consumers' premises due to RF noise lab facility. All other points should already be available via the framework that DCC has operated under for the provision of communication services for several years.</p> <p>2 Enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence. EDF response – Yes. However, although these additions may contribute DCC should already have said capabilities if these changes were not made.</p> <p>3 Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy. EDF response – No. Again, DCC should already have said capabilities without these changes.</p>	<ol style="list-style-type: none"> DCC notes the views of the respondent and agrees that the efficient operation of Smart Metering Systems at Consumers premises is facilitated by the changes proposed for RF Noise Testing. DCC notes that these capabilities are available prior to the modification, however, the proposal provides further clarity around the arrangements of Testing Services. DCC notes the views of the respondent and will update the Proposer's views accordingly.

Question 5: Noting the costs and benefits of this modification, do you believe MP138 should be approved?

Question 5				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	Only if DCC can provide the written assurances mentioned.	As noted above we agree that this should be approved only if there is a clear statement from DCC that there is no intention to levy any additional changes to SEC Parties, now or in the future, in relation to these additional services. This should be made clear in the report and if necessary, within the legal draft changes.	Please see response to question 1. DCC considers that this should be made clear in the Modification Report but does not feel it relevant to be included within the associated draft legal text changes.

Question 6: How long from the point of approval would your organisation need to implement MP138?

Question 6				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	0	There is nothing for us to implement	
EdF	Large Supplier	None	-	

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

Question 7				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	Yes	Although they should already be aware as these services are not new, the changes may enable all parties to be aware of the services and requirements for using them in a standard uniform approach.	Noted.

Question 8: Do you agree that the legal text will deliver MP138?

Question 8				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	See rationale	Whilst we cannot see a reference to specific charges to SEC Parties, we cannot see a definitive statement that SEC Parties that have already paid for set up costs will not be charged for future costs that may be incurred. Examples of such costs are ongoing maintenance or updates to the services mentioned.	Please see response to question 1. The Explicit Charges will be reviewed annually, and all ongoing maintenance will be incorporated into these charges. DCC does not consider that this needs to be included in the legal text of the modification as this will be confirmed in the Modification Report and managed through the Charging Statement review process.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP138 is implemented?

Question 9				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	There may be benefit to consumers from other parties using these new testing provisions. As there will be explicit charges for them, our customers will not be affected.	Noted.
EdF	Large Supplier	No	In reality apart from the change to the GFI allocations and set up recovery mechanism for RF Noise testing, all of these services are currently offered by DCC and we believe that they could continue without any changes to the SEC.	Noted.

Question 10: The set-up costs have already been recovered from DCC Users. Should the set up costs be recovered through the Explicit Charges to the Device Manufacturers and a rebate provided to DCC Users?

Question 10			
Respondent	Category	Response and rationale	DCC Response
OVO	Large Supplier	Though we believe there is no need to return these costs, we do not believe DCC should put industry in the position of its having invested significant amounts of money without first receiving approval from DCC User or SEC Parties. This is becoming a more frequent problem in recent years, and DCC should consider its processes carefully in future.	Noted.
EdF	Large Supplier	Yes, the set-up costs should be recovered and rebated to those who provided the funding in the first place. Device manufacturers have the ability to recover their costs via commercial contracts in the supply chain as with any other testing they undertake in design, production and test of their commercial offerings.	Noted.

Question 11: Please provide any further comments you may have

Question 11			
Respondent	Category	Comments	DCC Response
OVO	Large Supplier	-	
EdF	Large Supplier	To be clear, our response does provide a caveat that we expect a written confirmation from DCC to the SEC Panel that DCC will not pass any further costs to SEC Parties in relation to any of the items covered by this modification proposal. For clarity terms to the effect 'no intention' is not acceptable. Unless there is full confirmation that no further costs will be passed to SEC Parties, our position would be to 'reject' this modification proposal and any related legal text changes.	DCC will request that the Modification Report is updated to confirm that no additional costs will be passed on to SEC Parties through the Fixed Charges. All maintenance costs will be passed through the proposed Explicit Charges.