

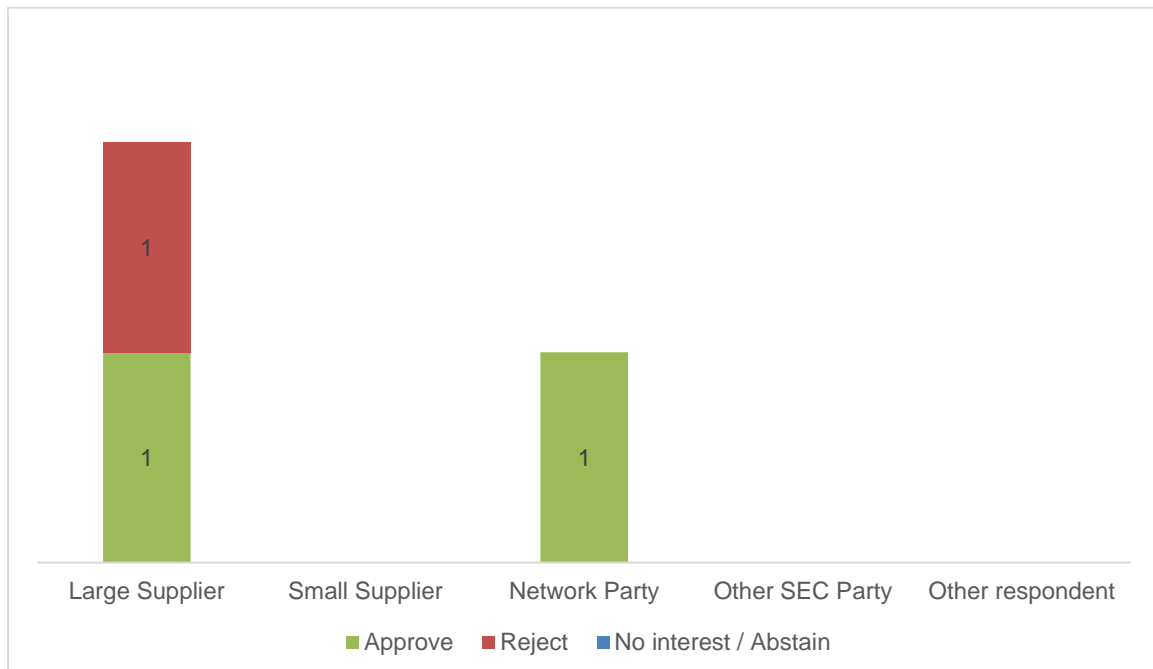
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MP134A ‘Use of SMKI Certificates relating to a SoLR event’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP134A Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP134A should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Approve	We approve MP134A to allow customers to continue with their PAYGE functionality during a SOLR event	-
Utilita Energy Limited	Large Supplier	We can understand the necessity of finding a solution to the problem of SoLR. The current situation puts prepay customer at significant risk – however this solution is not in a fit state to support its implementation.	<p>As previously stated in our Refinement Consultation response, Utilita has a number of concerns with the approach taken for MP134A.</p> <ul style="list-style-type: none"> We remain concerned that the Shared Resource Provider's (SRP) obligations are not defined robustly enough to provide sufficient protections for Prepay Energy Consumers. We are concerned that SRPs will have unlicensed access to customers. Without tightly defined, legally binding obligations in place for the Authority to action, it is unclear how SRP will operate, what they will and won't do for customers and what actions they will take ahead of a SoLR upon taking control of smart meters. Although this is only meant to be a short-term solution, MP134B appears to have stalled and may take several years to be implemented into the SEC. Prepay Energy Consumers are 	<p>The following responses have been drafted with input from the DCC and the Chair of the SSC/SMKI PMA. They follow the same order as each comment made by Utilita.</p> <p>Utilita concerns</p> <ul style="list-style-type: none"> The purpose of the modification is to ensure that Prepayment customers do not go off supply as a result of a SoLR event. MP134A provides a facility for a SRP in the event of a SoLR to send a limited set of commands on behalf of a failed Energy Supplier to ensure that this is the case. We recognise that there is nothing in this modification that mandates that a SRP should carry out this activity or that a failing Energy Supplier should

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			<p>disadvantaged compared to Credit Consumers, unless this mod is better refined.</p> <ul style="list-style-type: none"> Finally, we are concerned that MP134B, which is a derivative of this modification, has had multiple, potentially insurmountable issues identified – we question the appropriateness of an interim solution when the permanent solution is, according to the mod group, unlikely to be implemented soon. We are concerned that this will result in the interim solution becoming the de facto permanent solution. <p>To help resolve this, as a part of this modification we would welcome:</p> <ul style="list-style-type: none"> a step by step process map of the precise responsibilities of the SRP, e.g.: <ul style="list-style-type: none"> Step 1: move the customer into a non-disablement calendar Step 2: retain readings and balance, Step 3: manage exceptions (where the non-disablement calendar hasn't worked) Step 4: manage inflight CoS Losses 	<p>have arrangements in place with an SRP to ensure that the SRP carries out this activity. The obligations in this instance will sit outside the SEC and will be placed in the Electricity and Gas Supply Licences by Ofgem. Ofgem has advised that it will mandate Energy Suppliers to have a market exit process in place which ensures that all customers are not at risk of losing supply. Ofgem will audit this process with Energy Suppliers. Energy Suppliers may choose to have an alternate arrangement in place other than using SRPs. However, MP134A provides a (hopefully cost effective) mechanism that can be used by Energy Suppliers to fulfil these Supply Licence Obligations.</p> <ul style="list-style-type: none"> We also have concerns regarding SRPs acting in the role of Energy Suppliers and

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			<ul style="list-style-type: none"> A draft of the legal text which enacts the above with SRPs; and <p>a clear map of how the legal framework relating to SRPs will interact with the Energy Act and the supplier licences.</p>	<p>therefore being unregulated. We have shared these concerns with Ofgem who seems less concerned as it sees that any actions carried out by the SRP would be in line with contractual obligations between the failing Energy Supplier and the SRP in exactly the same way that the SRP acts on behalf of the Energy Supplier throughout the life of the contract.</p> <ul style="list-style-type: none"> As noted, the reason that this modification has been split in two is to provide at least some protection for prepayment customers in the case of a SoLR ahead of winter 2021. SECAS, BEIS and the DCC will begin work on drafting the business requirements for MP134B shortly, in preparation for a Preliminary Assessment. MP134B has been identified by the SSC as its preferred solution. MP134B would provide a clearer definition

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				<p>within the SEC of the roles and responsibilities of an SRP in the SoLR process.</p> <ul style="list-style-type: none"> One Working Group meeting has been held for MP134B since it was split from MP134A. SECAS is not aware of any insurmountable issues but notes there were concerns over how SPRs would be mandated to carry out their role in the Proposed Solution. However, we believe that possible delays to MP134B could be interpreted as good reason for implementing MP134A as deferring it would increase the number of winters customers would be at risk. <p>Utilita other requests</p> <p>A process map already exists. SECAS will endeavour to share this by the July 2021 Change Board meeting.</p> <p>Utilita requested for updated legal text that enacts SRPs in-line with Utilita's comments. We would question whether this level of detail should sit in the SEC or</p>

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				supporting guidance. However, we can understand why Utilita wants this in the SEC – it sets an explicit requirement which with the SRPs must comply.
Western Power Distribution	Network Party	Approve	We believe that this modification should be approved as it better facilitates SEC Objective (a) by ensuring efficient operation of smart Metering systems at energy consumers' premises.	-

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	No further comments	-
Utilita Energy Limited	Large Supplier	-	-
Western Power Distribution	Network Party	<p>We have the following comments regarding the legal text:</p> <ul style="list-style-type: none"> - SoLR definition – is it accurate that this is only applicate to Pre-Payment Consumers as per the definition? What happens to credit customers during this time? - SoLR definition states ‘Failing Supplier Party’ but we cannot see this as a defined term. - Supplier Certificates definition states ‘Suppler’ when it should be ‘Supplier’ - L16.2(a) states ‘Eligible DCCKI Subscriber’ however the defined term is actually ‘DCCKI Eligible Subscriber’. - L16.2(a) (i) – require confirmation that there is no SRV that would go to S1 device, only ever to the S1SP. 	<p>We have the following comments regarding the legal text:</p> <ul style="list-style-type: none"> - This modification is designed only to protect prepayment consumers. The Proposed Solution does not apply to, nor impact credit consumers. - ‘Failing Supplier Party’ has been updated to correctly reflect the new defined term of ‘Failing Energy Supplier’ with Section A. - ‘Suppler’ has been updated to ‘Supplier’ - ‘Eligible DCCKI Subscriber’ has been updated to ‘DCCKI Eligible Subscriber’ - SECAS believes the Proposer means Section L16.5(a)(i). SECAS

Question 2			
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			<p>can confirm in the case of SMETS1, there is no SRV that would go to a SMETS1 Device in the scenario addressed by this modification. It would only ever go to the SMETS1 Service Provider. No change has been made to the legal text as a result of this comment.</p>