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MP134A ‘Use of SMKI Certificates relating to a SoLR event’

Conclusions Report – version 1.0

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** MP134A. It believed the modification will better facilitate SEC Objectives (a)¹ and (b)².

Modification Report Consultation

SECAS received three responses to the Modification Report Consultation. Two of these believe the modification should be approved. One of these respondents considered the modification did better facilitate SEC Objective (a) by ensuring efficient operation of smart Metering systems at energy consumers’ premises. The third respondent believes the modification should be rejected.

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

² Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Modification Report Consultation responses

Summary of responses

Two respondents believe the modification should be approved as it would protect prepayment customers in a Supplier of Last Resort (SoLR) event. However, one of these respondents raised comments against the proposed legal text. These included requests for clarity on the intent of certain new obligations and the correction of typographical errors. SECAS responded to each comment and where errors in the legal text were identified, these were corrected – the updated legal text has been attached to the Modification Report.

One respondent believes the Proposed Solution is not in a fit state to support its implementation. However, they recognised a solution to the problem of SoLR for prepayment customers must be found. They raised concern that the obligations for Shared Resource Providers (SRPs) have not been clearly defined in the SEC and that it remains unclear how they will support prepayment customers in a SoLR event. In addition, they acknowledged that MP134A is intended to be an interim solution before MP134B is implemented. However, they noted that the MP134B solution is yet to be established and that there remain concerns over this. Therefore, they are concerned that this will result in the interim solution (MP134A) becoming the de facto permanent solution. SECAS provided responses to the respondent with input from the Data Communications Company (DCC) and the Chair of the Security Sub-Committee (SSC) and Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA). These can be found in the Modification Report Consultation Responses document. SECAS also committed to providing a process map setting out each step in the process of the MP134A solution.

Change Board vote

Change Board vote

The Change Board voted to recommend MP134A be **approved** by the Authority.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	3	0	1	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

One Large Supplier abstained from the vote. Whilst they supported the intent of the modification, they believed the Proposed Solution should be more robust.

Views against the General SEC Objectives

Objective (a)

The majority of the Change Board believed that MP134A will better facilitate SEC Objective (a) by ensuring that consumers, particularly prepayment consumers, do not lose supply in the event of a disorderly exit of a Supplier from the market and the necessary appointment of a Supplier of Last Resort (SoLR).

Objective (b)

The majority of the Change Board believed that MP134A will better facilitate SEC Objective (a) by ensuring the obligations on the Data Communications Company (DCC) are in line with the Proposed Solution.

Change Board discussions

The majority of the Change Board believed the modification should be approved. One Large Supplier abstained from the vote. They supported the intent of the modification and recognised a solution to the problem of SoLR for prepayment customers must be found, so agreed for the modification to proceed to vote. However, they agreed with the comments raised by a Modification Report Consultation respondent that the Proposed Solution should be more robust.