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MP162 'SEC changes required to deliver MHHS'

July 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS (Chair)
David Kemp	SECAS (Lead Analyst)
Holly Burton	SECAS
Bradley Baker	SECAS
Joey Manners	SECAS
Anik Abdullah	SECAS
Tom Mudryk	SECAS
Richard Vernon	DCC (Proposer)
Stuart Scott	DCC
David Walsh	DCC
Abhijit Pal	DCC
Remi Oluwabamise	DCC
Kevin Spencer	Elexon
Mark De Souza Wilson	Elexon
Andy MacFaul	Ofgem
Sarah-Jane Russell	British Gas
Seth Chapman	Castillo
Alex Hurcombe	EDF Energy
Paul Saker	EDF Energy
Julie Geary	E.ON
Daniel Davies	ESG Global
Paul Akrill	IMServ
Ralph Baxter	Octopus Energy
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Matt Howard	Siemens
Elias Hanna	Smart ADSL
Kristina Leary	SMS Plc
Matthew Alexander	SSEN
Nik Wills	Stark
Rachel Norberg	Utilita
Gemma Slaney	WPD

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Attendee	Organisation
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified and the proposed solution.

Issue

As the smart metering rollout continues, there will be more and more premises with Electricity Smart Metering Equipment (ESME) installed capable of recording consumption in each half-hour period. Ofgem's Electricity Settlement Reform Significant Code Review (SCR) has concluded that settling all consumers on a half-hourly basis would bring net benefits of up to £4.5bn by 2045[1]. It has therefore concluded that Suppliers should be mandated to settle their customers on a half-hourly basis.

Delivering the full solution for market-wide half-hourly settlement (MHHS) will require changes to the Smart Energy Code (SEC) and to the Data Communications Company (DCC) Systems. Ofgem has requested the DCC raise this SEC modification to progress and deliver these changes.

Solution

During the SCR, Ofgem has developed its target operating model (TOM) for how the full MHHS solution should be delivered. The SEC and the DCC Systems changes will need to deliver the requirements set out in the TOM.

This modification will cover all the SEC changes required to deliver the MHHS solution, which will include:

- The introduction of a new User Role for Parties carrying out the Meter Data Retrieval (MDR) service.

- Defining the relevant Service Requests the new User Role will have access to and the associated Target Response Times and testing scenarios.

- The associated security and data privacy arrangements that will apply to the new User Role.

- The User Entry Process requirements for the new User Role.

Working Group discussion – draft business requirements

General

A Working Group member (PS) queried if the new User Role would have any impact on how Suppliers would interact with the DCC, and the impact of using the role for different purposes. SECAS (AA) considered there should be little impact on User processes but noted the need for wider guidance on the impact of conforming to the longer Target Response Times (TRTs). Following the

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[1] Please see Ofgem's final business case and decision to implement market-wide half-hourly settlement for more details.

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DCC Preliminary Assessment, the Business Architecture Document and Model (BAD/BAM) can be reviewed for any changes needed. While the processes may not change, guidance on what Users would need to do can be added.

SECAS (AA) also queried the potential to be more efficient with the scheduling services, and whether that could be done as part of MP162. They noted the potential for automatically deleting schedules for export Suppliers. The DCC (SS) confirmed this could be looked at if there was a requirement to do so. However, this will need to be fully clarified around when and how such deletions would take place. SECAS (AA) noted this would be a nice-to-have requirement.

A Working Group member (PS) noted that part of the TOM relates to mandating half-hourly settlement for export energy and improving processes around this. They felt that if MHHS is looking at improving export processes generally, they would be keen to see a requirement around this under MP162. They considered this would be a positive move and would be in scope of this work.

The DCC (SS) noted they key question is around the triggers for automatically deleting a schedule. SECAS (AA) agreed, noting this needs to be visible too. It would also be good to resolve any inconsistencies with import Suppliers.

A Working Group member (JG) queried if this would apply following a change of Supplier (CoS) or more generally. They noted that old schedules are not deleted from a Device until it receives Service Request (SR) 6.23 'Update Security Credentials (CoS)'. However, in some cases following a CoS the gaining Supplier may not issue a SR6.23 for months, during which time the losing Supplier's schedules would continue to run, and would continually fail, generating unnecessary traffic. Rather than using the Service Request as the driver for completion, they considered whether the DCC could use the information around who is the responsible Supplier at that point to delete old schedules. This may also be useful for other processes that need updating following a CoS.

Another Working Group member (DD) considered Device switching could be another trigger. They also noted the Central Switching Service (CSS) will speed up this process.

The DCC (SS) was concerned that this additional requirement could expand significantly, and the Working Group needed to be clear how far any requirement here would need to be extended.

Elexon (KS) highlighted a Supplier could change but the new Supplier could use the same MDR as the old Supplier, which may mean no change in schedules. A Working Group member (EL) flagged that the old Supplier would de-appoint the MDR then the gaining Supplier would re-appoint the MDR.

Requirement 1

SECAS (JM) queried if there would need to be any certificate changes for the MDR, or whether it was all managed by the Data Service Provider (DSP). The DCC confirmed this was the case, and no Device changes will be needed.

Elexon (MdSW) noted there was no Effective To Date (ETD) proposed for inclusion in the Supplier Meter Registration Service (SMRS) data. The DCC (SS) believed including this would be the best approach for data matching, but the DCC can work without this information if required. A Working Group member (EL) was concerned if this could result in an MDR being appointed indefinitely, and another member (PS) queried how this would work if a Supplier was carrying out the MDR activities in-house.

Elexon (MdSW) queried how far in advance of its appointment going live a new Meter Data Retrieval Agent (MDRA) would be able to set up schedules. The DCC (SS) responded that it would depend

how far in advance the registration data is received and highlighted this sequence of events still needed to be clarified by the wider project. A Working Group member (PS) noted that next-day switching should be the default by the time MHHS goes live, so this is likely to be a moot point.

The DCC (RV) noted this was an issue with the SEC and DCC changes being progressed separately ahead of the other Code changes, with questions on the wider processes still outstanding that this change is dependent on knowing. They did not believe it was yet clear how this would work if a Supplier did not appoint a separate MDR.

A Working Group member (PA) noted the proposal for longer TRTs for MDR Users but that Suppliers could still use the shorter TRTs through using their Supplier role rather than the MDR role. They were concerned this could give an advantage to Suppliers, which could be bad for competition. Another member (PS) agreed. They felt the same standards should apply to both Suppliers and standalone MDRAs, and that these should be the same that Suppliers get now. There are different use cases for this data, and the worst-case scenario is getting the same data for different purposes.

SECAS (JM) queried if the use cases and traffic profile had been developed, and how the MDR will impact this. The DCC (DW) noted they will be working on assumptions but that this is likely to impact the infrastructure. The DCC will be developing a profile model around this. The DCC (SS) also highlighted that if all Users accessed half-hourly data on a 30 second TRT daily, the DCC's infrastructure will need to be increased or it will struggle. A Working Group member (PA) believed that if the calendar function was used to schedule the delivery of half-hourly data, there is a greater than 90% likelihood this pattern will be followed so considered the chances of the system being overloaded should be small.

A Working Group member (JG) sought clarity on whether Suppliers needed permission to obtain half-hourly data. Elexon noted that domestic import customers would be able to opt out of this. The member then queried how data separation would work if a Supplier has the new MDR User role but was also acting as an Import Supplier, and what the data could be used for in each case.

Requirement 2

A Working Group member (JG) queried, if a new Party was set up on the MDR User role and was then requesting half-hourly data, what certificates and credentials would it need. The DCC (SS) clarified that it would be treated like an Other User in this scenario. The DCC would use its DCC credentials to obtain the requested data from the Device. It would then wrap this in further credentials before sending it on to the MDR User so that only intended recipient could then read it.

A Working Group member (EH) asked whether customers would need to give consent for an agent to collect data on their Supplier's behalf. SECAS (JM) responded that such consent would be obtained through the Supplier. A Working Group member (PS) highlighted that corresponding Licence changes are being drafted for this under the SCR.

The Working Group noted the proposal for MDR Users being a new Party Category and queried why they couldn't simply be included under the existing 'Other SEC Party' Party Category.

A Working Group member (PS) also queried whether Suppliers needed to register in the new DCC User Role. They sought clarity on how the MDRA and Supplier roles would interact, and was concerned if this meant Suppliers would no longer be able to obtain half-hourly data from smart meters under the Supplier role and would only be able to obtain it using the MDR role. If this isn't the case, clarity is needed on which role a Supplier would use use in each scenario, and what would prevent a Supplier using its Supplier role to obtain the data.

Another member (DD) considered that the Supplier would be able to retrieve data for billing purposes and other consented uses through the Supplier role. However, for settlement data, they would need to create a schedule using the MDR User role. They agreed that the overlap between the roles needs clarifying and how it can be proved the right data is being collected for the right purposes. The first member wondered what role a Supplier would use if it wanted to obtain half-hourly data for both settlement and billing purposes. They also queried how this would be enforced.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair had noted that from an architectural perspective, it would seem odd to force a Supplier to retrieve data it has already obtained just because it needed to submit it for settlement. This would also create unnecessary traffic through the DCC Systems.

Requirement 3

The Working Group had no comments on this requirement.

Requirement 4

A Working Group member (JG) queried why MDR Users would need to submit on-demand requests if a schedule had been set up. The DCC (SS) responded that ad-hoc requests may be needed if a schedule failed to carry out or if something had gone wrong with the data retrieval.

Working Group members reiterated their concerns noted above about the proposed different service levels for different User types.

Requirement 5

The Working Group had no comments on this requirement.

Requirement 6

Elexon (KS) clarified that a Supplier or an MDRA would be able to submit partial data (half-hourly values for only part of a day) into settlement and then catch the remaining values up later. The DCC (SS) noted that data collected via a scheduled request would collect what it could at that time. If it only collected partial data, the User would need to submit an on-demand request to obtain the rest.

A Working Group member (SC) noted the assumption validation data would be collected monthly and was concerned whether Suppliers would want to wait that long to confirm if any data had been missed. SECAS (JM) also queried if validating less frequently would result in larger files when validation was carried out. The DCC (SS) sought confirmation from members whether they would just need register values to validate against, or the more detailed breakdowns.

A Working Group member (JG) highlighted existing constraints with trying to collect a month's worth of half-hourly data at once. Another member (PS) flagged that Users would be collecting data for other uses too, and that this would need to be overlaid with the data collection for settlement.

A Working Group member (EH) flagged constraints on the Communications Hub and noted there is a requirement for a Device to hold 13 months' worth of data. Another member (JG) acknowledged that while Devices do hold this data, some Devices won't populate a Service Request Variant (SRV) 4.8.1 'Read Active Import Profile Data' response with more than 10 days' worth of data.

The DCC (SS) considered that a key part of this modification will be around managing demand and system capacity. The DCC has assessed many variables which will affect the amount of traffic and took the Working Group through its initial thoughts. The DCC is keen to understand key volumetric data as early as possible to help inform its capacity modelling.

A Working Group member (JG) queried whether the DCC's assessment of the opt-out rate had been based on data. The DCC (SS) confirmed this had been based on conversations with Elexon and Ofgem, and that empirical data had been hard to obtain. Any further information members could provide would be welcomed by the DCC. The member noted they had seen opt-out rates higher than 10% and asked if the DCC could determine opt-outs from the SR5.1 'Create Schedule' requests sent. The DCC confirmed it could see if a schedule had been set up, but not why, so could not tell if this was due to opt-out or not.

Another member (PS) highlighted customers must actively opt in now but will have to actively opt out under MHHS. They considered the DCC's initial assumptions to be reasonable ones based on Ofgem's work. A further member (EL) noted the inclusion of collecting export data through the DCC will add a further million Meter Point Administration Numbers (MPANs).

A Working Group member (JG) highlighted conversations from other forums raising concerns that the overnight processing of reads is already creeping into the following working day even without the half-hourly data requests for settlement. They sought confirmation of whether this had been considered to date. The DCC (SS) agreed that the DCC needed to validate the expected demand and whether this can be handled as part of MP162.

Requirements 7 and 8

A Working Group member (PA) queried why the security and privacy arrangements are modelled on Other Users when the MDR User is more akin to an RSA. The DCC (SS) noted this is because an RDA cannot collect data from a Device.

The Security Sub-Committee (SSC) will be reviewing these requirements on 14 July 2021.

Next steps

SECAS and the DCC will review the comments and queries raised by the Working Group and will update the draft business requirements ahead of the next Working Group meeting.

The following actions were recorded from the meeting:

- SECAS and the DCC to assess a potential requirement for deleting old schedules, particularly for export data, and the triggers for this as part of MP162, and liaise with Ofgem and Elexon on how this relates to the wider TOM.

- Ofgem/Elexon to confirm the proposed process for registering a change of MDRA via the registration data.

- SECAS and the DCC to review the proposed principle for Suppliers to use the MDR User role and the proposed longer TRTs for this role and consider if there is an alternative approach to managing this. Ofgem and Elexon to be engaged on this to ensure any impacts from this are fed back into the TOM.

- Working Group members to feed in any further views on the DCC's assumptions on demand for MHHS data.

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