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## MP162 ‘SEC changes required to deliver MHHS’

### August 2021 Working Group – meeting summary

#### Attendees

Attendee	Organisation
Ali Beard	SECAS (Chair)
David Kemp	SECAS (Lead Analyst)
Joey Manners	SECAS
Robin Healey	SECAS
Richard Vernon	DCC (Proposer)
Abhijit Pal	DCC
Charlotte Semp	DCC
David Walsh	DCC
Remi Oluwabamise	DCC
Tosin Adeove	DCC
Kevin Spencer	Elaxon
Sarah-Jane Russell	British Gas
Seth Chapman	Castillo
Julie Geary	E.ON
Daniel Davies	ESG Global
Ralph Baxter	Octopus Energy
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Nik Wills	Stark
Kelly Kinsman	WPD

#### Overview

The Smart Energy Code Administrator and Secretariat (SECAS) (DK) provided an overview of the issue identified, the proposed solution and key discussion points from the last meeting.

#### 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<sup>1</sup>. 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

SECAS (DK) took the Working Group through the draft business requirements that were discussed at the last meeting, noting where changes were being considered in response to the comments raised.

### Requirement 2

Elexon (KS) noted that a Code Change and Development Group (CCDG) subgroup had been working through the requirements. At a meeting the previous week it had determined that the Supplier would be responsible for appointing the Smart Data Service (SDS) and appoint the Meter Data Retrieval Agent (MDRA). This would be the case even if the Supplier was appointing itself as the MDRA.

A Working Group member (EL) queried whether, once an MDRA had been appointed, it would stay appointed even if the customer was migrated to a different Supplier who would want to appoint itself as the MDRA. Another member (SC) confirmed that following a change of Supplier (CoS), the MDRA would be de-appointed and re-appointed, meaning there would be an end-date for someone fulfilling the role.

A member (EL) queried if there was any additional work for a Supplier wanting to act as the MDRA. Elexon (KS) confirmed that any Supplier who wanted to act as an MDRA would need to register its Market Participant Identified (MPID) against this role in Market Domain Data (MDD).

The DCC (CS) further clarified that a Supplier would choose whether to appoint themselves or a third party as the MDRA, and that whoever is fulfilling this role needs to have the relevant accreditation.

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<sup>1</sup> Please see Ofgem's [final business case and decision to implement market-wide half-hourly settlement](#) for more details.

Suppliers would already have this from when acceding as a Supplier. An agent would need to undergo the accessions process to gain the relevant qualifications for accessing the data needed for MHHS.

#### **Requirement 4**

The DCC (RV) informed the Working Group that the DCC had taken on board the comments raised at the last meeting. The DCC is looking at an alternative solution which would not require a Supplier to register in the MDR User role but would instead focus on the Target Response Times (TRTs) when requesting data for settlement.

The DCC (DW) noted the DCC was looking to introduce different TRTs for different uses of the data. If a Supplier was collecting the data for non-MHHS uses (such as billing or a customer query), the existing TRTs would apply. For data retrieval related to MHHS, the DCC would want the User to say the request is related to MHHS via marking a tag in the relevant Service Request. The DCC could then use the DCC scheduling service to deliver the data within 24 hours. The DCC would seek to add direction on this into the SEC, but would not aim to enforce it; this would therefore be reliant on Users' honesty in tagging the request as being for MHHS.

A member (JG) queried that if a Supplier was acting as its own MDRA and was requesting data for half-hourly settlement purposes, it would be expected to mark it as such. The DCC (DW) confirmed this was the case, noting that it was looking to add a tag to the existing Service Request Variants (SRVs) rather than create a new set specifically for MHHS.

A member (EL) noted that SRV4.1.1 'Read Instantaneous Import Registers' and SR4.2 'Read Instantaneous Export Register Values' don't bring back profile data. They also noted that the requirement for MDRA's validating the data had been removed from the TOM. Suppliers need different data for profiling from that for billing, and these two Service Requests relate to billing.

Elxon (KS) agreed there was several reasons why a Supplier may want to obtain a meter read, particularly if there had been issues affecting the half-hourly data or if the customer had opted out of half-hourly settlement. In the latter case, the Supplier would need to use the reading to calculate an advance which would be applied to a load profile to obtain half-hourly values. They sought clarity over what would happen if a Supplier was obtaining the data both for settlement and for other uses. The DCC (DW) confirmed the shorter TRT would be used here.

A member (EL) noted the process had not been mapped out and asked for more detail on how this will work. The DCC (CS) confirmed the process will be mapped out as the solution is developed but confirmed that any existing smart processes will be unchanged by MP162. The member noted that billing will likely be on different frequencies to settlement and considered Suppliers would be setting up schedules for these.

A member (DD) noted that if a Service Request is sent as an MDRA, the 24-hour TRT will apply, but if sent as a Supplier the 30 second TRT would apply. They asked how Suppliers' use of this will be governed. The DCC (DW) noted it would be reliant on Suppliers' honesty. Suppliers could choose to ignore the request to mark MHHS data collection as such, and the DCC would then have to expand its capacity to cater for that. The DCC is not looking to force Suppliers on this, but to place the onus on them to specify the use for the data (whether for MHHS or not). There would likely be some enforcement in the SEC on this though. The alternative would be for the Data Service Provider (DSP) to build in some complex validation rules and provide significant, and costly, infrastructure upgrades. A member (EL) noted applying such filters and logic is undesirable, and wanted this point clearly called out.

SECAS (RH) noted it is important to apply the principle that settlement is separate to the core smart arrangements but was surprised the DCC was not proposing more validation. They asked if the DCC would be able to check a User's role. The DCC (DW) responded this is a difficult one to answer as validation would go deeper than just who the User is. However, the DCC may need to check if someone is persistently issuing Service Requests to a particular Device or area. SECAS (RH) asked the DCC to keep the option for technical validation open when carrying out its Preliminary Assessment.

A member (SC) highlighted that the approach being considered would still have advantages for Suppliers who are choosing to carry out the MDRA role themselves. They acknowledged the large cost for such changes but considered it still didn't seem level across different User types.

The DCC (DW) noted the principle of there being no detrimental impact on any existing Users, not just Suppliers, because of MHHS, but could have a look at what more can be done here. A member (EL) noted Suppliers had already paid for the smart metering infrastructure. They queried that if there is a need for expanding the system's capacity to cater for uses it hadn't been originally built for, who should pay for that.

The DCC (DW) noted it is treating MHHS as additional usage on top of the existing requirements. It has considered what it expects traffic to be under the current usage, and what extra will be required for MHHS usage. Any added infrastructure is being modelled as what extra capacity the DCC would need to build to meet the requirements for MHHS.

A member (SC) asked what would happen if a Supplier agent needed the option for a quicker response, and whether the tag should be applied to MDR Users too. The DCC (DW) noted that the relevant Service Requests would be tagged as being for MHHS purposes by default when submitted by an MDR User. It also queried what scenarios there would be for an agent needing a faster response but could consider this if there was a valid use case. The member agreed to give this some thought and would respond to SECAS and the DCC on this.

SECAS (JM) noted the log size in Devices. If the TRT is reduced but a large amount of data is requested, that would add pressure to the system. The DCC (DW) acknowledged this is something to consider.

The DCC (CS) queried who would own the service requirements for MHHS. When considering the request for faster response times for agents, they asked whether this would be in response to a service requirement. They were not clear who owns the design of the MDRA. Elexon (KS) noted it is up to the SDS to tell the MDRA the sites, data required and relevant dates to allow the MDRA to schedule requests. The SCR will be drawing these processes up with the requirements set out as part of the relevant Balancing and Settlement Code Procedure (BSCP). SECAS and the DCC will keep engaged with Elexon to assess if the DCC solution needs further refinement as these processes evolve.

A member (RB) queried if there was an alternative option for the medium term. They noted the discovery under [MP122B 'Operational Metrics – Part 2'](#) that the current response times can't be met and asked if this is leading to excessive caution over response times. They thought the most likely outcome of the MP122B work is recognition that the very quick response times are unachievable without massive investment, while the 24-hour response times may feel pessimistic. They considered if there is wider improvement that could be made in this space. The DCC (CS) noted the main aim of scheduling is to take reads during the quieter parts of a given 24-hour window. If all Users had the 30 second TRT then if one User requests data at a given time this will usually be fine. However, if several, or all, Users requested the data at the same moment, the system would not be able to manage that.

### Requirement 5

A member (EL) queried if this was any different to Requirement 3, and whether these could be merged. Elexon (KS) noted the Supplier Data Registration Service (SDRS) will control data access, and the member considered that the access control referenced in Requirement 3 would draw on this data too. SECAS and the DCC agreed to investigate if there was a reason for separate requirements, and to merge these two if not.

### Requirement 6

A member (EL) asked if the DCC's business process forums be looking at this. The DCC (DW) confirmed the DCC will be capturing the business processes for this modification as part of delivery.

Elexon (KS) noted the SCR will be working through the SDS requirements in the coming weeks and will feed these discussions in to SECAS and the DCC.

### Conclusions

The Working Group agreed that, based on the discussions in this meeting, the further meeting scheduled for 11 August is not needed. SECAS and the DCC will update the business requirements to reflect the DCC's revised approach. SECAS will then circulate this to members for final comment before the Preliminary Assessment is initiated.

### Next steps

The following actions were recorded from the meeting:

- Supplier Agents to consider valid use cases for their needing access to the shorter TRTs and to provide these to SECAS and the DCC
- Elexon to keep SECAS and the DCC informed of any further developments on requirements arising from the SCR.
- SECAS and the DCC to update the business requirements for the revised approach and circulate these to members for final comment. Following this the Preliminary Assessment will be requested.