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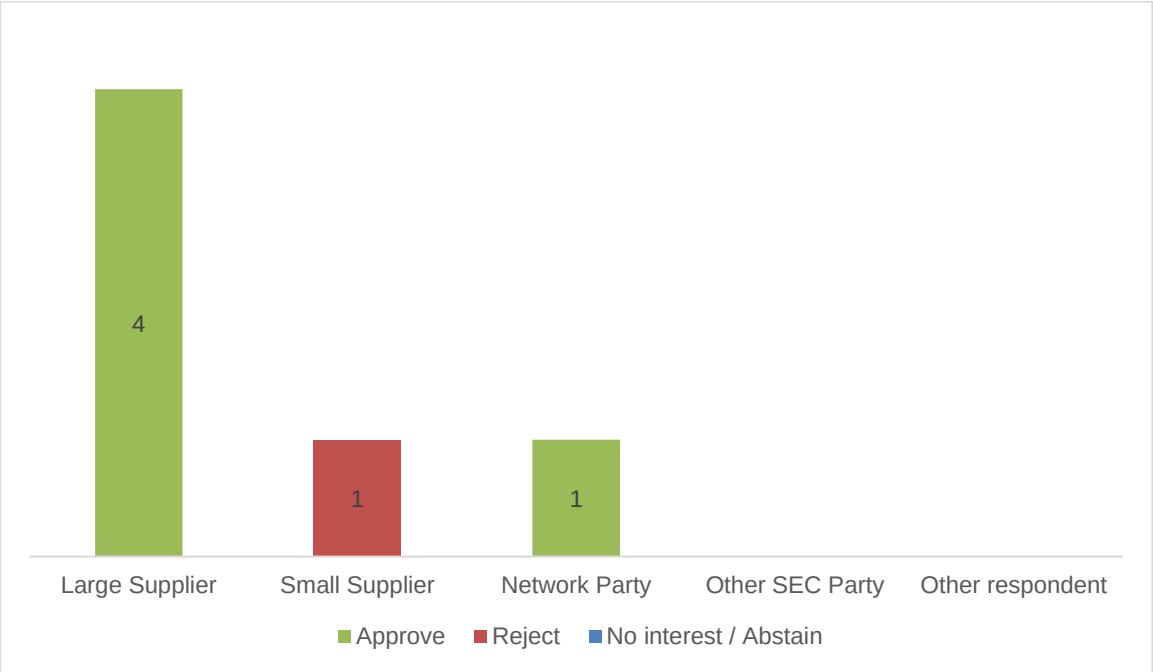
MP121 'Commissioning non-commissioned Devices after CoS' Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP121 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP121 should be approved?

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
British Gas	Large Supplier	Approve	We agree that the email option should be approved and this would better facilitate SEC objectives a and c.	-
Western Power Distribution	Network Party	Approve	We believe that this modification better facilitates SEC Objectives (a) to facilitate the efficient provision, installation, and operation, as well as interoperability, of smart metering systems at Energy Consumers' premises within Great Britain.	-
Orbit Energy Ltd	Small Supplier	Reject	I disagree that providing install codes should be the responsibility of the installation supplier. There are large numbers of suppliers and determining who was the installing supplier will be a time consuming task which we do not have the resources for. We also do not really have the resources to respond to requests from other suppliers withing 10 days. As you know all suppliers are currently going through a difficult time commercially and providing additional resource is not easy. The obligation to provide install codes should be on the MAPs. They should know who the current supplier is and if the meters have been commissioned, additionally they	The Proposed Solution to place the SEC obligation on Suppliers aligns with the Supply Licences Condition 49 (for electricity) and Condition 43 (for gas) which requires Suppliers to ensure their Devices can communicate with the DCC once WAN is available.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			already have contacts in the organisation. It should be very easy for them to send a list of install codes periodically to each supplier they are invoicing. Then there is no obligation on suppliers to have to share data with each other via email – which is always labour intensive.	
Utilita Energy Limited	Large Supplier	Approve	Implementation of this modification will facilitate the establishment of smart metering services at point of commissioning when WAN is established, thus achieving SEC objective A – efficient installation and operation of Smart Metering Systems. SEC Objective C will also be achieved through this modification - allows gaining Suppliers to interact with the Smart Metering System when WAN is established to accurately reflect their product offering on consumer Devices. This will allow customers to manage their energy use in a more efficient manner through the provision of relevant information by that gaining Supplier.	-
OVO	Large Supplier	Approve	We believe having a process in place will assist Industry in dealing with this problem going forward. We do not believe the SLA section applies though. Please see Question 2.	-

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
EDF	Large Supplier	Approve	This modification will better facilitate SEC Objectives (a) and (c) as the consumers at premises affected by this issue do not have access to the benefits of smart metering as the Devices at these premises are not providing smart functionality.	-

Question 2: Please provide any further comments you may have

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
British Gas	Large Supplier	-	-
Western Power Distribution	Network Party	-	-
Orbit Energy Ltd	Small Supplier	-	-
Utilita Energy Limited	Large Supplier	N/A	-
OVO	Large Supplier	How can work be done on any backlog before there is an obligation upon Suppliers to follow the process? That means the expectation is that Suppliers will need to follow the process before it is implemented. The only way to clear the backlog is to follow this process, that is not yet in effect. The solution makes sense going forward, the clearance of the backlog defined in the SLA in the Mod Report does not s there is an expectation of work being done against a process not yet in existence and the issues called out (Suppliers not responding) will still be there. Additionally, has it been confirmed that ALL Installing Suppliers will be able to provide the Install Codes to be able to meet the SLA. As there is an expectation that the standard escalation path be followed, which will go via SECOPs up to Panel, these will take time to address and not move us any further forward. Being able to point to the SEC will assist but leaves us no further forward.	It is expected that preparatory work would be required to be able to meet any new obligation, be that an internal process to be set up, system changes or any other work required to enable a SEC Party to meet an obligation. It is hoped that if an unreasonable number of requests was being made that would be considered between the Suppliers upon request. The escalation route would require evidence to be presented and this would be considered at this time.

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
			Suppliers have been engaged via the SEC Modification Process, but it has not been possible to individually contact Suppliers to confirm they can meet the SLA.
EDF	Large Supplier	It is important to note that the provision of the installation codes may not be the only data items needed to successfully commission installed devices. SECAS and the Ops Group need to ensure a documented process is created if/when MP121 is approved including templates, contact lists etc. These must ensure that appropriate information is communicated between suppliers to facilitate the commissioning of devices - including device IDs (including the CH GUID) as required.	SECAS will create guidance for this process and can include these items.