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## MP121 'Commissioning non-commissioned Devices after CoS'

### August 2021 Working Group – meeting summary

#### Attendees

Attendee	Organisation
Bradley Baker	SECAS
Ali Beard	SECAS
Kev Duddy	SECAS
Khaleda Hussain	SECAS
Joey Manners	SECAS
Anik Abdullah	SECAS
Chris De Asha	DCC
Remi Oluwabamise	DCC
David Walsh	DCC
Sarah-Jane Russell	British Gas
Julie Geary	E.ON
Daniel Davies	ESG Global
Chris Latchford	Money Plus Energy
Ralph Baxter	Octopus Energy
Michael Walls	Ofgem
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Kelly Kinsman	WPD

#### Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified in [MP121 'Commissioning non-commissioned Devices after CoS'](#), recapped the Proposed and Alternative Solution, summarised the Refinement Consultation themes and proposed next steps.

#### Issue

- There are instances where Smart Metering Equipment Technical Specifications 2 (SMETS 2) Devices have been installed but not commissioned.

- The Data Communications Company (DCC) has 90 days to address Wide Area Network (WAN) connectivity but a Change of Supplier can occur during this time.
- Lack of install code prevents smart functionality and the only current solution is to perform a site visit to replace the existing Device.

## Working Group Discussion

### Solution options summary

SECAS provided a summary of the automated solution, through the Self-Service Interface (SSI), and email solution options that are being proposed. One Working Group member clarified that the wording on the slide should be 'installing' Supplier, rather than 'losing' Supplier as the Supplier that installed the Device would hold the install code. SECAS clarified that the obligation would be placed on the installing Supplier, and they would need to respond to confirm they had not installed the meter if that was the case.

The DCC noted that the email solution had not been explored thoroughly as to whether it would work. Another Working Group member noted that install codes are currently being exchanged over email by Suppliers, and this would just provide an obligation on the Supplier to respond.

A Working Group member questioned whether this was actually part of a wider problem whereby the incoming Supplier is not able to access the historical data of a Device. The DCC advised that this is a separate issue as they do not currently have access to the install codes and questioned whether there were security implications from making them available to the DCC. A Working Group member noted that this was because this scenario was not anticipated, rather than a previous decision related to information security.

A Working Group member highlighted that any solution could have issues with a Supplier of Last Resort (SoLR) scenario. SECAS noted this had been briefly discussed with the Proposer who advised that the newly appointed SoLR should have the Advanced Shipment Notification (ASN) files that contain this data. Parties acknowledged this but highlighted that data may not be readily available/easily accessible and more work would be needed to understand how this would be managed.

### Automated Solution

Working Group members agreed that the enduring solution needed to be automated. However, Refinement Consultation responses and Working Group discussions raised concerns that the SSI solution was not feasible. One Working Group member suggested they would prefer a system whereby they could upload data to, rather than raise each query one at a time.

SECAS questioned whether the data could be made available in the Smart Metering Inventory (SMI). A working Group member questioned whether the install codes could be recorded in the SMI as part of the pre-notification stage, also noting that they did not want to be querying the SSI for individual pieces of data. SECAS advised that submitting data to the SMI is not dependent on the meter being commissioned and this would be an option.

Most respondents felt that a bulk upload option was essential to any automated solution. The DCC advised that this had not been a requirement in the Preliminary Assessment. SECAS stated that although it had been discussed with the Proposer at the outset of the modification, it had been determined that it would have been too complex to include within the business requirements.

## Email solution

A consideration of the email solution was how a contact list would be managed for this process. SECAS confirmed that there is already an Operational Contact List that is maintained by SECAS and this would be able to be expanded to include contact points for any new process. This is currently issued to Parties quarterly to ensure it is up to date. SECAS advised that management of the contact list for this process could begin from the date of approval. This would help ensure a contact list is fully populated by the implementation date.

SECAS raised a question as to whether the legal text should be agnostic to a solution. The legal text for the Alternate Solution currently states install codes are to be exchanged via email. SECAS suggested that the obligation could state 'in writing or other agreed means', which would then enable an SSI change later to be progressed without a modification. Working Group members agreed this was a sensible option.

## Refinement Consultation responses

SECAS presented the main themes from the Refinement Consultation responses. SECAS noted that all respondents agreed that this modification is required and should be approved. One respondent had stated that neither solution will provide a fix for all of the instances where a meter is not commissioned. The Proposer acknowledges this and SECAS advised that this solution is aimed to fix the scenarios where a meter is not commissioned but where making the install code available would resolve the issue.

Respondents broadly agreed that the legal text delivered the intended solutions, but some Parties raised concern that there was no escalation route noted in the legal text. SECAS has investigated this with the SEC Party Engagement team who advised that any failed obligation follows the same process within the SEC and does not need to be defined.

Most Parties supported an automated solution but did not feel that the SSI solution was the correct way to solve the issue. Some respondents highlighted that the email solution and SEC obligation could be implemented in the interim, while an automated solution was progressed as a separate modification. SECAS advised that this is the route that the Proposer wished to proceed with.

SECAS informed the Working Group that respondents to the Refinement Consultation had raised concerns about the timescales with a five Working Day (WD) Service Level Agreement (SLA) in the legal text. The Proposer has suggested raising this to 10 WD. Two Working Group members felt that they could not agree on an SLA without knowing what the solution is. Another Working Group member highlighted that any SLA should not apply to the large backlog of install codes that needed to be resolved.

## Bulk upload and backlog

Parties noted that the backlog would need to be cleared in advance of the obligation, or meters that form part of the backlog must be excluded in some way. There was discussion around the size of the issue. A previous figure from the Department for Business, Energy and Industrial Strategy (BEIS) of 500,000 Devices in an uncommissioned state actually referred to the number of Devices in a pending state. However, it was confirmed by a Working Group member that this number included Devices in a

genuine pending state and the actual number was much lower. SECAS also confirmed that BEIS had advised them of this.

## Next Steps

SECAS stated that the Proposer wished to progress the email solution as soon as possible. SECAS suggested that in light of the Working Group discussions, it was clear that the automated solution via the SSI was not suitable for SEC Parties. SECAS asked the Working Group whether they wished for the automated solution to be pursued under this modification, or whether it should be developed separately. The Working Group agreed that it should be separate from this modification and followed up through a new modification.

The following actions were recorded from the meeting:

- SECAS to amend the legal text accordingly
- SECAS to prepare MP121 for the Modification Report Consultation