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MP185 ‘Additional controls to support the SoLR process’

Annex B

Industry Consultation responses

About this document

This document contains the full collated responses received to the MP185 Industry Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	The solution put forward is necessary to allow MP134A to be fulfilled and the customer to have continuity of energy during a SOLR event	
Octopus Energy	Large Supplier	Yes	<p>Based on the intention to resolve issues in relation to customer risk for:</p> <ul style="list-style-type: none"> -prepayment -emergency jobs -SMETS1 ALCS <p>Our response is also based on the statement that the SoLR drives the decision making process with regards to timescales, as this is key for us. It allows the SoLR to take any perceived risks or commercial implications into account and to then drive the decision making process.</p> <p>However, there are additional concerns that we will include in the responses to follow.</p>	
E.ON	Large Supplier	Yes	The solution will enable the transfer of MPIDs to the SoLR to be co-ordinated and agreed with the SoLR, taking into account when the subsequent Change of Supply activities can be completed. This will ensure that continuity of	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			supply is maintained and essential activities can be carried out on the Smart devices in the premise during the interim period. We firmly believe that SoLR related processes must be designed and operated in a way that protects continuity of supply for consumers.	
EDF	Large Supplier	No	<p>While we recognise that the intent of MP134A has not been met, we are concerned that the cause of the problem has not been fully analysed and understood.</p> <p>We are not aware of the issue MP185 is seeking to address, and we are concerned that this solution, which addresses a problem only found by one supplier may impact future SoLRs undertaken by other suppliers. It raises some further questions:</p> <ul style="list-style-type: none"> • If the MP134A solution doesn't work because MPIDs get transferred on the day of the SoLR (too soon) – do we really know that the transfer of MPIDs has caused critical commands being sent from the Shared Resource Provider (SRP) to fail? • How do we get assurance that this is the only barrier to MP134A working? • How was this issue missed from the implementation of MP134A? 	<p>We have had confirmation that more than one Supplier has been affected by this issue. We also have confirmation that the MPID transfer has prevented SRs being sent.</p> <p>During recent examples the reversal of the MPID transfer alleviated the problem.</p> <p>The SEC only specifies the revocation of SMKI Certificates. The transfer of MPIDs is not mandated at any one particular time. However, the confusion around when the</p>

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<ul style="list-style-type: none"> Does the solution to delay MPID transfer completely solve the issues that have manifested since the implementation of MP134A? It would be a shame to be in a position after the implementation of MP185 that we would need to come back for a third time. For example; have all the impacts of delaying MPID transfers been identified? Might there be an impact to DCC charging if MPID transfers are delayed? <p>Furthermore, it would be very helpful if there was a better understanding of the SoLR process on an end to end basis so that everyone can understand SoLR across all codes.</p> <p>We are not opposed to the solution. We are only concerned that it hasn't been suitably investigated for root cause and a full solution defined.</p>	<p>transfer of the MPIDs should take place needs to be addressed.</p> <p>To clarify this solution is to allow the authority to delay transfer of MPIDs if it is considered necessary, however it may not be needed in which case the Parties involved can agree to transfer the MPIDs immediately the SoLR is appointed.</p> <p>We agree. SECAS is currently working on a document to draw all the information together. The draft of this document was presented at the last Panel meeting (SECP_97_1510)</p>

Question 2: Do you agree that the legal text will deliver MP185?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	-	
Octopus Energy	Large Supplier	Yes	<p>However, it doesn't clearly define in L16.9 that the SoLR will decide on the timeline, as per the summary in the MP185 document. This states 'The transfer of the MPIDs to the SoLR would need to be agreed with the SMKI PMA and the DCC by the SoLR once they have an agreed set of information.' This text suggests that the SoLR has sole decision making capability, but this is not defined within L16.9, so this needs to be made explicit.</p> <p>It's imperative that the SoLR decides on the timelines, so that the current portfolio is not placed in detriment and/or additional costs incurred based on unnecessary delays.</p>	We will confer with the SEC Lawyer and provide a verbal update at Change Sub-Committee and Change Board.
E.ON	Large Supplier	Yes	<p>We agree that the legal text proposed will deliver the described intent.</p> <p>However, implementing changes solely to the SEC will not fully address the risks outlined in the Modification documentation. Supporting changes to the industry SoLR procedures will need to be implemented and enforced to ensure that the DCC actions relevant instructions from the Authority, the SEC Panel and SMKI PMA in an appropriate sequence and on a timely basis.</p> <p>Solely implementing changes to SEC Section B and Section L will not address these procedural elements,</p>	As above, SECAS are drafting a document covering the end to end SoLR process. We can then determine if any other changes might be needed, however, other changes are outside the scope of this modification.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			meaning that the underlying issues could materialise again.	
EDF	Large Supplier	Yes	It meets the intent of this change.	

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	-	
Octopus Energy	Large Supplier	Yes	If agreed and based on the likelihood of further SoLR events soon, it would be prudent to deliver on an expedited timeline.	
E.ON	Large Supplier	Yes	-	
EDF	Large Supplier	Yes	We agree with an implementation date of one working day after decision.	

Question 4: Will there be any impact on your organisation to implement MP185?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	No	Only positive in that customers will not be impacted by the SOLR event.	
Octopus Energy	Large Supplier	No	If agreed, we have the structure and flexibility to engage and deliver the agreed process.	
E.ON	Large Supplier	No	-	
EDF	Large Supplier	No	This is based only on the detail contained in the report We reiterate our comments that we have not aware of this problem in any of the SoLRs we have been involved in. We would not want future SoLRs to be impacted by changes made to address a problem that has occurred due to one party following a different process.	

Question 5: Will your organisation incur any costs in implementing MP185?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	No costs	-	
Octopus Energy	Large Supplier	No costs	<p>For clarity, we don't expect to incur explicit costs to deliver, based on the details provided in the 'Costs' section. However, delays in transferring MPIDs from existing 3rd party providers may well result in commercial discussions in relation to continuing to provide services. As contracts are unlikely to be in place between the SoLR and those 3rd parties, there could be contractual and cost implications where suppliers are expected to pay inflated rates to retain a service for a short period of time while a decision is clarified.</p> <p>Our concern is that the MOD could have the unintended consequence of significantly increasing the costs of a SoLR event, as there are no obligations on 3rd parties to continue to provide a service where no contract is in place with the new supplier.</p>	There is no requirement to delay transfer of the MPIDs and the SoLR may decide to request that the PPM consumers are put into safe mode but then continue with the transfer of MPIDs. It would then be up to the SoLR to determine how it will deal with emergency meter works etc.
E.ON	Large Supplier	No costs	The modification will not add any additional cost to E.ON.	
EDF	Large Supplier	No costs	Not that we can see	

Question 6: How long from the point of approval would your organisation need to implement MP185?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Immediately	-	
Octopus Energy	Large Supplier	Immediately	We anticipate that this can be implemented immediately as a process	
E.ON	Large Supplier	Change can be implemented immediately	This represents a positive change to the SoLR process, and we believe it gives greater control to the appointed SoLR.	
EDF	Large Supplier	No time	-	

Question 7: Do you believe that MP185 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	Better facilitates SEC Objective A	
Octopus Energy	Large Supplier	Yes	Based on the intention to resolve specific elements of customer detriment (listed in Q1), we support the intention to better facilitate the General SEC objectives	
E.ON	Large Supplier	Yes	This change enables better consumer protection by enabling specific communication with the Smart devices in a premise in the period between a SoLR being appointed and Change of Supply being completed.	
EDF	Large Supplier	Yes	If this is the only change required to meet the intent of MP134A then EDF agrees with the Proposer believes this modification 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 SoLR.	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP185 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	Customers will benefit from this change in that they can continue to consume energy and not be forced into an off-supply situation	
Octopus Energy	Large Supplier	Yes	As well as the benefits listed in Q1, we would also add that the solution could ensure booked smart jobs are able to proceed post SoLR. We experienced an issue during the most recent SoLR with AVRO where 1,800 installs had to be cancelled. These cancellations have the potential to affect the perception of the entire smart rollout, but also have a detrimental effect on the customer confidence in the new supplier. Furthermore, these cancelled jobs incur an immediate cost in GSOS payments incurred by the new supplier.	
E.ON	Large Supplier	Yes	This change will improve the quality of service for consumers affected by the SoLR process, primarily by reducing the risk of disconnection for PAYG customers, or by allowing resolution of other unexpected operational issues that emerge on credit mode assets operated through the DCC. In addition, it also supports better management of all consumers, both credit & PAYG, during the transition period from the old Supplier to the SoLR.	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Yes	This change should help ensure that prepayment customers remain on supply in the event of a SoLR.	

Question 9: Noting the costs and benefits of this modification, do you believe MP185 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Centrica	Large Supplier	Yes	-	
Octopus Energy	Large Supplier	Yes	The listed costs are negligible, However, we want to reiterate the concerns we've listed in Q5. There is the potential for 3rd party service providers to levy significant charges to continue to provide a service during the period where the MPIDs are not yet transferred.	
E.ON	Large Supplier	Yes	There is no cost associated with delivering an essential process change, therefore this change should be approved and expedited.	
EDF	Large Supplier	Yes	As noted – it is not entirely clear how the delay of MPIDs is impacting the commands sent by an SRP. Nor is it clear whether any consequential changes will arise from delaying the transfer of MPIDs. However, taken as read, we support the modification	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Centrica	Large Supplier	-	
Octopus Energy	Large Supplier	<p>Based on our recent experience of the AVRO SoLR, we found the immediate transfer of the MPIDs to be beneficial in providing immediate access to the smart meters. We would clarify that this experience was based on the 3rd party providers and the gained supplier being accommodating in providing their input and support.</p> <p>However, there is an inherent risk in leaving all meters exposed to the former connection and further checks should be implemented by the DCC in relation to ensuring there are no instances where the smart meter network and customers are placed at risk e.g. a disgruntled employee triggering specific requests to meters.</p> <p>Also key to ensuring this process can run smoothly is to stipulate the timelines and data required immediately after the SoLR event, This is imperative to ensure that the new supplier can make an informed decision as to whether the MPIDs can transition immediately, or whether a delay is the best course of action.</p> <p>This is likely to require additional supplier input, but we would suggest a summarised view providing (but not restricted to):</p> <ul style="list-style-type: none"> a clear outline of all 3rd parties involved, including the adapter provider a breakdown of customers by prepayment and credit, with traditional meters and S1 not enrolled and adopted (including SMSO information) Smets 2 metering volume split by credit and prepayment mode 	<p>Thank you for your comments, these will be fed into the SoLR overview document that is being prepared.</p>

Question 10			
Respondent	Category	Comments	SECAS Response
		<p>Smets 1 E&A details of migrated and/or adopted volume</p> <p>This summarised view should also be accompanied by detailed reports at the relevant level of detail i.e. MPXN, MPRN and GUID</p> <p>We received incorrect data in relation to volume of meters in the SMI and this led to superfluous work with regards to attempts to gain SMETS1 meters to our adapter, which resulted in failed attempts to CoS gain. It's key that the data quality is reliable to ensure the correct key decisions are made in relation to migrating the MPIDs</p>	
E.ON	Large Supplier	N/A	
EDF	Large Supplier	It would be very helpful if there was a better understanding of the end to end SoLR process so that everyone can understand SoLR across all codes.	