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MP116 ‘Service Request Forecasting’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP116 Refinement 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
Western Power Distribution	Networks Party	No	Whilst we understand the issue and the intent, we still believe that there is some work to do with the details around the solution.	SECAS will review the responses to the Refinement Consultation with the Proposer and amend the legal text and DCC User Guidance document accordingly before returning to the Working Group.
British Gas	Large Supplier	Yes	DCC have enough historical data to forecast the aggregate number of SRVs / CSRs more accurately than the collective DCC Users.	
OVO	Large Supplier	Yes	We are hopeful that the issues identified will be resolved, and the User burden of having to provide these values going away, will make this better for all. As long as the matters pertaining to the guidance and the processes described are addressed. The Mod itself needs work to be done outside of the process, set out in the guidance, to ensure this is successful.	The DCC User Guidance document will undergo review following the feedback received through this consultation. This will be issued ahead of the next Working Group.
EDF	Large Supplier	Yes	Although we do not expect to see benefits from the implementation of MP116 as we will still be required to forecast SRs for the purpose of Anomaly Detection Thresholds and will still be required to provide input into the DCC for exceptional events.	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	No	<p>We believe that the fundamental approach is flawed, specifically that the DCC cannot be expected to manage traffic outside of the forecasted expectations. Rather than depending on the accuracy of a forecast, the DCC should be working towards maximising the required capacity</p> <p>Relying on the DCC calculations isn't enough, as the market is continually changing and can't be simply based off current and historic analysis. Using actual usage data will always carry the risk that exceptional/unforeseen circumstances whereby a User submits a higher volume of SRs than predicted will not be accounted/planned for in the forecast. We understand that DCC Users can contribute information on SR forecast through the instructions given in DCC's Guidance Documents, but there is no accountability in the DCC taking on board this information while it remains outside the SEC.</p> <p>Finally, we also question how this modification will reduce resource timings completely as validation of each forecast is still expected from DCC Users and ideally can only be done well through collating all DCC User analysis.</p>	The Proposer has responded, whereby to keep things as is, Users will still be providing inaccurate forecasts, for example the DCC would have to provide a service with a significant increase in capacity to facilitate current inaccurate forecasts at a high cost.
E.ON Energy	Large Supplier	Yes	No comment.	

Question 2: Do you agree that the legal text will deliver MP116?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	No	<p>We have the following comments on the legal text:</p> <p>H3.21 – Where it states ‘DCC User Interface Services Schedule’ we think it should also state ‘SEC Appendix E’.</p> <p>H3.22 – SECMP 27 amended the Service Request Forecasting to exclude certain SRVs, (H3.25 (b)), however this modification does not allow for any excluded SRVs. We understand that this might no longer be required but feel that there needs to be discussion and agreement as these were excluded specifically as Users are unable to accurately forecast them, and this is still the case.</p> <p>H3.22 – States that methodology will be shared with the Panel and we question whether it should also be shared with Users. The Guidance document (Section 3.1 point 1) states that it will be shared with Users.</p> <p>H3.23 - Where it states ‘DCC User Interface Services Schedule’ we think it should also state ‘SEC Appendix E’.</p> <p>H3.24 (a) -Where it states ‘DCC User Interface Services Schedule’ we think it should also state ‘SEC Appendix E’.</p>	SECAS will collate all legal text comments and will discuss with SEC Lawyers and the Proposer. Amendments will be made accordingly. An updated document will be provided ahead of the next available Working Group.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			<p>H3.24 (b) – States ‘significant deviation’. We believe that this needs to be defined more as it is open to interpretation.</p> <p>H3.25 – As per our comments to H3.22 we think excluded SRVs should be considered here.</p> <p>H3.25 – We challenge the obligation that Users will notify the DCC, challenging the accuracy as then we will only know what activity we are undertaking and not those of others. Our activity might not impact the DCC forecast to a ‘significant’ level, but is there the potential that a few Users collectively in this position might, but would be unaware and therefore the DCC would not be notified?</p> <p>H3.26 – We believe that it might be appropriate for the DCC to apply to change this list if they see an SRV increase in volumes that means that it then falls into the ‘Top Service Reference Variants by Volume’.</p> <p>H3.28 (b) – We are concerned that the obligation is on Users to confirm the accuracy with limited information and therefore DCC not being held accountable if there is an issue with capacity and Users have not challenged the forecast, even if they did not see reason to.</p>	
British Gas	Large Supplier	No	Our concerns lie with H3.28 where there is no onus on DCC if they are unable to provide accurate forecasts. We believe this should be removed.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No	The legal text, although points Users to the Guidance, makes no reference whatsoever to any other exceptional circumstance where a Service User will need to send a great volume of SRVs that previously, such as in the situation of a Price Change. There is reference in the Guidance to 'Tariff Change' but it is not clear which SRVs are applicable and the Use Cases surrounding this. The guidance also calls out changes to the ADT settings being benchmarked via this process too and the legal text calls out that a User reviews the report but not how we then notify the DCC outside of that review of changes that occur. Clause H3.28 allows DCC to defer being in breach if we do so but doesn't seem to define how we should do this. Will the Fasttrack process exist as there is no reference to it in the Legal Text.	
EDF	Large Supplier	Yes	It seems to be suitable.	
Utilita Energy Limited	Large Supplier	No	It is unclear where accountability lies for signing off each forecast (Is it with the DCC or with DCC Users).	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 3: Do you agree that the DCC User Guidance document provides sufficient guidance for Users to deliver MP116?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	No	<p>We have the following comments about the User Guidance document:</p> <p>1.1 – We believe that ‘service providers’ should be ‘Service Providers’.</p> <p>1.1 – States ‘enable the prediction’ which we believe is slightly inaccurate and ‘aid the prediction’ would be more appropriate as there is no guarantee that it will enable prediction of future workloads.</p> <p>1.1 – We believe ‘service request’ should be ‘Service Request’.</p> <p>1.1 – We believe that ‘Obligations’ should be ‘obligations to be consistent with 3.2. Also, as mentioned previously, we are concerned that the obligation is on Users to confirm the accuracy with limited information and therefore DCC not being held accountable if there is an issue with capacity and Users have not challenged the forecast, even if they did not see reason to.</p> <p>1.3 – We believe ‘Service Request Forecast guidance’ should be ‘Service Requests Forecasts guidance’ as this is the name of the document.</p>	SECAS will collate all DCC User Guidance document comments and will discuss with the Proposer. Amendments will be made accordingly. An updated document will be provided ahead of the next available Working Group.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<p>1.3, 1 – We believe ‘6’ should be ‘six’ and that the word ‘month’ is missing.</p> <p>1.3, 2 – We believe the word ‘month’ is missing after ‘48’.</p> <p>1.3, 2 – where it states ‘DCC User Interface Services Schedule’ we think it should also state ‘SEC Appendix E’.</p> <p>1.3, 3 – We believe, as per our comments under question two, that there should be a section here to detail excluded SRVs.</p> <p>1.3, 3 – We believe ‘3’ should be ‘three’.</p> <p>2.2 – SEC Appendix E is actually the DUISS and not DUIS so this needs amending.</p> <p>3.2 – It would be useful to define the location within SharePoint as it is not easy to locate anything within this area. Also as per previous comments, we are concerned that the obligation is on Users to confirm the accuracy with limited information and therefore DCC not being held accountable if there is an issue with capacity and Users have not challenged the forecast, even if they did not see reason to.</p> <p>3.2 – We believe ‘service requests’ should be ‘Service Requests’.</p> <p>3.2, 1 – It states that the methodology is shared with Users, however the legal text doesn’t state this and so there is misalignment which could lead to confusion.</p>	

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<p>3.2, 2 – We believe that ‘significant’ is a word that is open to interpretation and should be expanded on.</p> <p>3.2, 3 – We believe that this is a really valid and appropriate point, however it is not mirrored in the legal text.</p> <p>3.2, 5 – We believe that any comments made by users should also be shared with the Panel, regardless of whether the DCC have felt the need to act on them or not.</p> <p>3.2, 6 – We believe that there should be reference to excluded SRVs as mentioned previously, and also that the DCC should be able to apply to change this list if they see an SRV increase in volumes that means that it then falls into the ‘Top Service Reference Variants by Volume’.</p> <p>3.2, 7 – We believe ‘service request forecast’ should be a defined term.</p> <p>3.2, 7 – We believe that ‘workshop or bilaterals’ may result in there not being enough industry input. We question where it should ‘and’ rather than ‘or’ and also whether there should be an industry consultation to allow everyone the opportunity to review and comment. We need to ensure there is enough accurate input and part of industry cannot speak on behalf of all of industry in this scenario.</p>	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<p>3.3 – We just wanted to note the lack of DNO SRVs within this list and highlight that this could change as DNOs begin to utilise smart data more within their businesses.</p> <p>4.1 – We believe ‘variant’ should be ‘Variant’.</p> <p>4.1 – We believe ‘Detail the’ should be ‘Detail of the’.</p> <p>4.1 – We believe ‘enrolled’ should be ‘Enrolled’.</p> <p>5 – We ‘Service Request variance report’ should be ‘Service Request Variance Report’.</p> <p>5 – We believe ‘distinct’ should be expanded on so that it is clear what is being referred to.</p> <p>5 – We believe ‘service request variance report’ should be ‘Service Request Variance Report’.</p> <p>5 – We believe ‘Service Request Variance report’ should be ‘Service Request Variance Report’.</p> <p>5 – It would be useful to define the location within SharePoint as it is not easy to locate anything within this area.</p> <p>5 – We believe ‘improve forecast variance’ should be ‘improve forecast accuracy’.</p> <p>6 – We question whether changes to the guidance document should be consulted on, rather than just workshopped at the Panel.</p>	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	We believe this can evolve over time and would expect DCC to update the guidance after periodic reviews with SEC Ops groups.	
OVO	Large Supplier	No	<p>We have several queries with the DCC User Guidance. In Section 3.2.</p> <p>We would like to understand the interactions Users will have with the Panel, or it's delegated authority, and how this will work. Noting this group will be defining 'corrective actions' which is a term we do not understand.</p> <p>In 3.2.3 there is mention of DCC monitoring revisions made to the ADT files and clarifications be sought as to why we're making changes to our values. Is it possible to understand why we need to explain the changes and to what end? This is a new requirement that we do not understand the need for. The same is true of 3.2.4. You will be looking for clarifications if your forecast is out by more than 10% to find out why. What is the expectation of us on this and what data should Users be keeping to explain changes in SRV values? Which SRVs will be include and which will be excluded from these clarifications? This may provide to be a challenging ask and something we may struggle to provide any feedback upon.</p> <p>In 3.2.2.c this seems to cover Firmware updates but not how we are to notify yourselves. It does not seem to</p>	SECAS will collate all DCC User Guidance document comments and will discuss with the Proposer. Amendments will be made accordingly. An updated document will be provided ahead of the next available Working Group.

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<p>include Price Changes as there is a callout for Tariff Changes, which includes other SRVs we may use. It would be more beneficial if Price Change, and the SRVs that apply, are called out explicitly in the same way as Firmware OTA SRVs are. We also assume there is no expectation for Users to provide any reason for the increase or any onus to engage in any bilateral meetings to notify yourselves as this is not mentioned. How are we to notify yourselves?</p> <p>3.2.3. We will do this by changing the ADTs accordingly. Is there a separate requirement to notify you over and above the ADT change as to this being because we're planning to adjust our install capacity?</p> <p>And, as already called out, we'd like to understand what is meant by 'adopting the same definitions, the SRF will be used to benchmark the global ADT settings'. Is this to create an aggregate forecast and then provide an aggregate variance report or will it look at a 24 hour peak?</p>	
EDF	Large Supplier	Yes	It seems fit for purpose.	
Utilita Energy Limited	Large Supplier	No	As mentioned in Question 1, it is concerning how much the DCC will plan their forecast on historic data. This leaves DCC system capacity vulnerable to exceptionally high volumes of SR traffic. Therefore, where the DCC must provide commentary on any identified reasons for	

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			the failure in meeting forecasts– this should go a step further, the DCC should also need to provide mitigations of these errors occurring again, so that the forecast is always being defined and improved regularly.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 4: Do you agree with the proposed implementation approach?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	Yes	No comment.	
British Gas	Large Supplier	Yes	However, given there are no system changed and DCC are already forecasting, is there an option to bring this forward to the November 2021 release?	Following a review of these responses, the draft legal text and DCC User Guidance document will be subject to further amendments. This will result in a potential decision being reached by December 2021.
OVO	Large Supplier	Yes	As long as the queries and clarification with the Legal and Guidance documents are addressed.	
EDF	Large Supplier	Yes	Implementation in 2022 is appropriate	
Utilita Energy Limited	Large Supplier	No	The only changes needed are for the SEC documentation as this has already been implemented by the DCC.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 5: Will there be any impact on your organisation to implement MP116?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	Yes	We will be impacted as it will remove the obligation on us for submitting Service Request forecasts, however it will place an obligation on us to approve the DCC forecasts.	
British Gas	Large Supplier	Yes	Less resources required to complete a forecast each quarter and then check the actuals.	
OVO	Large Supplier	Yes	We will need to implement a function to validate the DCC generated forecast and review that, with the appropriate responses to feed in. We would also need to establish the processes required to manage the exceptional circumstances although it is unclear how we input them and do them as a fast track. We assume this will stay as is although we don't currently provide these which has led to operational issues. We would also like to understand how DCC will react to us providing adjusted forecasts that their internal systems cannot manage, such as the recent issue with the SMETS1 OTA requests. This Mod being implemented would not have addressed this and it would still have caused User impacts to our organisation.	SECAS will raise your query regarding adjusted forecasts with the Proposer.
EDF	Large Supplier	Yes	It will save a very small amount of time.	
Utilita Energy Limited	Large Supplier	Yes	We will need to validate the DCC's new forecasts. To do so, we will have to continue to conduct our own analysis.	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			<p>This increases our current workload in relation to SR forecasting.</p> <p>We will also need to try and predict exceptional events, account for one-off business activity and other innovation type activities. By their very nature, these types of events are challenging to quantify.</p>	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 6: Will your organisation incur any costs in implementing MP116?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	No costs	No comment.	
British Gas	Large Supplier	No costs	No comment.	
OVO	Large Supplier	Less than £100k	It is unclear the amount of manual work required to carry out the functions specified.	
EDF	Large Supplier	No costs	No comment.	
Utilita Energy Limited	Large Supplier	No costs	No direct costs, other than staffing costs. However, there would be significant costs to our organisation if we are ever restricted from operating freely or expanding our activities.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 7: How long from the point of approval would your organisation need to implement MP116?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	N/A	No comment.	
British Gas	Large Supplier	None	No comment.	
OVO	Large Supplier	2/3 months	We'd need to implement several internal processes to cope. Some of which have been suspended due to the change in the way forecasts have been managed.	
EDF	Large Supplier	6 months	No comment.	
Utilita Energy Limited	Large Supplier	N/A	No comment.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 8: Do you believe that MP116 would better facilitate the General SEC Objectives ?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	Yes	We believe that the intent behind SEC Modification 116 would better facilitate SEC Objectives (a) and (b) for the reasons detailed in the Modification Report.	
British Gas	Large Supplier	Yes	We agree that the change would better facilitate SEC objectives A & B.	
OVO	Large Supplier	Yes	As set out in the Mod Report.	
EDF	Large Supplier	Yes	MP116 better facilitates SEC Objectives (a) and (b) as stated in the Modification Report.	
Utilita Energy Limited	Large Supplier	N/A	While there is a case for change, as the current process does not seem to be working effectively for the DCC, we cannot say confidently that that this mod meets SEC Objective A to provide efficient provision. On the other hand, this mod would meet SEC Objective B as the DCC are currently using this forecasting rather than relying on DCC Users forecasts as highlighted in the SEC currently.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP116 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	No	No comment.	
British Gas	Large Supplier	No	No comment.	
OVO	Large Supplier	Yes	Yes, as detailed. This process will still not stop SRVs from being suspended within the DCC if there is not the capability to react to the changed forecast. This has happened already.	
EDF	Large Supplier	Yes	Marginal for us, but the DCC may see some benefit from better forecasting so that they can better manage their services.	
Utilita Energy Limited	Large Supplier	Yes	The primary goal for the DCC to make sure there is capacity to handle all SRs in a timely manner, if this can be achieved then that would be the central benefit for the Consumer, but at this stage we have no reassurance in the DCC's forecasting, as we begin to already see limitations on S1 firmware upgrade processed through the DCC, indicating some systems are already struggling to meet demands.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 10: Noting the costs and benefits of this modification, do you believe MP116 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Networks Party	No	Whilst we support this intent of this modification, for the reasons given previously we don't feel that it should be approved at this time.	
British Gas	Large Supplier	Yes	Providing H3.28 of the legal text is removed.	
OVO	Large Supplier	Yes	It must be noted DCC have already changed the way we submit forecasts so the biggest change has already been implemented. It would need these to be reinstated if the Mod is not approved and the new way of dealing with exceptional SRV changes not addressed, as such, this should be approved once it is all clarified.	
EDF	Large Supplier	Yes	Low cost change that may provide some benefit.	
Utilita Energy Limited	Large Supplier	No	For the reasons highlighted in Question 1.	
E.ON Energy	Large Supplier	N/A	No comment.	

Question 11: Please provide any further comments you may have

Question 11			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Networks Party	<p>We have the following comments about points within the Modification Report:</p> <p>2 – DCC Load Forecasting types – we wonder if there should be reference and consideration given to maintenance and BCDR activities.</p> <p>3 – It states ‘Users will sign off’ however it is still unclear exactly how this will work.</p> <p>3 – We would like confirmation that the reporting that will be produced will be automatically uploaded to SharePoint and not uploaded manually as this can cause issues.</p> <p>3 – User Input states that the DCC will ask User to notify them, however the legal text makes this an obligation, rather than a request. It also states a select number of Parties will be requested by the DCC to provide input. We are concerned that this is not appropriate and might not be accurate to represent all of industry. In comparison it then states that Network Operators may be requested to input. We also don’t think that this is the same as what is represented within the legal text.</p> <p>7 – Input from Users states that the guidance document has to be agreed by the Design Release Forum, and we would like to know how and why? If this is the case does the guidance document governance section need to allow for this. What happens if industry agree but the</p>	<p>SECAS have raised your comments with the Proposer, who has provided the below comments:</p> <p>3 – Users to submit any comments or input to the DCC prior to publication, not ‘sign off’ per se.</p> <p>3 – As a single document, accessible for all Users, there should be no impact with this being uploaded manually.</p> <p>3 – The wording in the legal text is not explicit in terms of an obligation, instead it would be beneficial for the DCC to receive this information and it would like to encourage users to do so.</p> <p>7 – No comments received from the Design Release Forum on 11 August 2021.</p>

Question 11			
Respondent	Category	Comments	SECAS Response
		Design Release Forum have a different view and want to make changes when they haven't been involved in the discussions. 7 – Use of SharePoint – we would rather that the reporting that will be produced will be automatically uploaded to SharePoint and not uploaded manually as this can cause issues.	
British Gas	Large Supplier	No comment.	
OVO	Large Supplier	Not at this time. All comments are within the answers provided.	
EDF	Large Supplier	No comment.	
Utilita Energy Limited	Large Supplier	No comment.	
E.ON Energy	Large Supplier	<p>Based on the guidelines set out for the modification proposal – MP116 'Service Request Forecasting' we are happy to accept the terms but we would welcome clarification on the following points:</p> <ul style="list-style-type: none"> The 48 month forecast being produced seems like an unrealistic time period based to forecast on the speed of change. Why is this needed? What is the feedback process based on the calculation of each Service request variant if we disagree with what has been calculated? Are there any penalties associated with not responding and ultimately going over forecast? 	<p>SECAS have raised your comments with the Proposer, who has provided the below comments:</p> <p>The intent of the 48 month forecast is to provide a benchmark of how the system needs to scale so the DCC is aware of the order of magnitude and can therefore scale cost efficiently.</p> <p>In terms of the feedback process, the DCC expects Users to contact the DCC directly.</p> <p>In regards to your query relating to SMETS1 and SMETS2, there will be a</p>

Question 11			
Respondent	Category	Comments	SECAS Response
		<ul style="list-style-type: none"> Two Service Request Forecasts covering both SMETS1 and SMETS2 are produced but a single Service Request Variance Report (Report) is produced (1.3 and 5). The Report comments on actual and forecast aggregate service request volumes. This will not be sufficient (as not split by SMETS1 and SMETS2) to identify the potential cause of any variance to enable feedback. What date will these changes take effect and how far back will they be looking at historic data? (as may skew the forecast) Any considerations regarding suppliers who are a part of the supplier of last resort process and how this could affect the forecasting that is outside of commercial activities. Is there a review point to assess how this new process is working? - say after 6 months, 12 months (lessons learned etc). 	<p>single SR forecast covering both SMETS1 and SMETS2.</p> <p>Historic data will be dependent on the SRV, and will be used where relevant (for example Covid-19 has distorted figures).</p> <p>For SoLR events, it is anticipated tha this should have a minimal impact as the SRs will still be sent, regardless of the source.</p> <p>Finally, in terms of the review process, the approach is to be reviewed by the Panel on the anniversary of when the new process starts – see legal text H3.27.</p>