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MP162 ‘SEC changes required to deliver MHHS’ Refinement Consultation responses

About this document

This document contains the full **non-confidential** responses received to the MP162 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	Network Party	No	<p>Whilst we support the intent of the modification we believe that there is still a lack of information and detail around the solution to be able to support it in its current state.</p> <p>We believe that the modification is missing any detail about the reporting and performance requirements, despite it stating 'MP162 proposes to introduce all the expected changes needed under the SEC and the DCC Systems for MHHS'.</p> <p>We don't feel that there is any recognition of the main MHHS Programme and the need to interact with that. This modification is all based off the TOM, however there is no provision or plan for what will happen if this TOM changes as the programme works through the design artefacts.</p> <p>There also appears to be no consideration or detail about potential cross code changes (see response to Q10, assumption 8).</p>	<p>The remaining areas of the solution, which will include reporting requirements, will be discussed and developed with the Working Group ahead of a further consultation.</p> <p>The DCC agrees that no requirements regarding reporting and performance were included in the Preliminary Assessment. These can be added to the business requirements for the Impact Assessment.</p> <p>The DCC and SECAS are in discussion with the main MHHS Programme, and is aligning requirements and solutions, recognising that there are time alignment issues that do create a noted risk. It is unlikely that the TOM itself will change at this stage of the programme. Additionally, the DCC and SECAS are represented on the relevant MHHS Programme decision groups, which will be responsible for agreeing MHHS processes and defining cross-Code change. We also understand</p>

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				the MHHS Programme will be responsible for ensuring all cross-Code aspects are covered off.
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Not in current form	<p>MP162 comprises two key components: creation of the new Meter Data Retriever (MDR) role and DCC infrastructure upgrades to support HH data collection. We address both in turn below.</p> <p><u>Meter Data Retriever (MDR) Role</u></p> <p>Part of the identified issue is that independent organisations currently have no means of fulfilling the requirements of the MDR function within the Smart Data Service (SDS). Competition in this area has been highlighted as a key part of the MHHS TOM by Ofgem – the DCC and SEC have an obligation to ensure that not only is this implemented but also that it is effective. This has been jeopardised by the decision to progress this via the SEC Change route, in isolation of the wider MHHS Programme (MHHSP). In our view, this should be part of the MHHSP Design workstream with requirements being dictated by the Programme.</p> <p>To be successful, the solution needs to treat independent and supplier organisations equally – with equivalent access to data and prioritisation of requests. The solution as currently proposed fails to fully achieve this. Suppliers can access shorter TRTs through their IS role, with only</p>	<p>Please note the solution option to add an Attribute to the MHHS Service Requests has been dropped, incidentally removing the need for a mandatory change to the DUIS for existing Users. Please also see the response to EDF under question 2 below.</p> <p>Option 1 appears to restrict MHHS data collection to an MDR role only, where the requirements indicate a Supplier can either appoint an independent MDRA or retrieve their own data. Energy Suppliers have indicated they want the option to re-use their existing Supplier User IDs and not use a new MDR User Role.</p> <p>Option 2 has two options: use the existing Supplier TRTs and create increased demand peaks in current scheduling window; or ask Suppliers to reduce the ‘existing reads returned by 08:00’ behaviour and align all Users to existing</p>

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			<p>an “honesty box” as a control, and are at the front of the scheduling queue with the 00:00-06:00 read window. Not only is this ineffective competition but it also makes it more difficult for the DCC to efficiently manage demand and capacity.</p> <p>We outline below, in order of preference, three options to amend the solution to address this:</p> <ol style="list-style-type: none"> 1. Consumption data can only be retrieved by via MDR with access to the existing TRTs 2. Proposed solution but with equivalent access to the existing TRTs for IS and MDR 3. Proposed solution but MDR can access a shorter on-demand TRT for SRV 4.8.1 <p>Option 1 would ensure parity between supplier and independent organisations whilst also facilitating efficient capacity management at the DCC – all scheduled service requests for consumption data, regardless of purpose, would be subject to the same 24hr TRT. On-demand service requests with shorter TRTs would be available as required, with incentives to minimise their use, – satisfying both supplier and independent use-cases. Under this option, the distinction between MHHS and existing processes disappears – data is collected once by an MDR and used across multiple processes: billing, settlement and energy management.</p>	<p>24 hour scheduling TRTs. Each option creates issues for at least one party.</p> <p>Option 3 is possible but opens up risk, as previously discussed with the DCC, that meter data retrieval compounds an existing issue on unpredictable demand and the DCC has to increase capacity to support possibility risk. This would need a SEC obligation cover for ALL Users to use scheduling service for MHHS data collection purposes, something that was rejected by the Working Group.</p> <p>The DCC has provided information on current and predicted future demand. It has also made and shared assumptions on future demands and capacity associated with this modification as the basis for establishing the level of change required for the infrastructure and capacity to meet the projected additional demand.</p> <p>DCC funding has also been provided to cover the existing and future service as defined in the original solution designs and original contracted Submit Final Tender (ISFT). The solution to support the</p>

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			<p>Duplication would therefore be minimised as only the appointed MDR can collect consumption data. Customer procured OU services can sit alongside. The process for an existing DCC User (e.g. a Supplier) to become an MDR could be streamlined. The only impact to existing supplier processes would be that collection is conducted via MDR rather than IS, which could be the same organisation.</p> <p>Option 2 would also ensure parity between supplier and independent organisations but increases the potential for duplication as both supplier and MDR could set up schedules for consumption data. This would make it harder for DCC to manage capacity efficiently and potentially increase costs. As with Option 1, there would need to be clear and strong disincentives for sending unnecessary on-demand requests. Existing processes would not have to change at all.</p> <p>Option 3 does not achieve parity between supplier and independent organisations but allows the MDR to access a shorter on-demand TRT for 4.8.1, which is the most vital SRV under MHHS. As with Option 2, there would need to be incentives around the efficient use of on-demand requests; however, the focus would be on supplier users who would have access to shorter TRTs across a wider</p>	<p>proposed MHHS service was not part of those original definitions and is being added by this modification.</p>

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			<p>range of SRVs. The potential for duplication is the same as Option 2 as is the impact to existing processes.</p> <p>In our view, Option 1 would achieve the greatest benefit overall. A similar approach was initially proposed for this Mod, which suggests it was the DCC's preferred option, but the majority of the workgroup disagreed. This is an example of why we believe this change should be progressed within the MHHS Programme and its governance structure to ensure a solution that is optimal for industry, whilst meeting the requirements of all, is pursued.</p> <p><u>DCC Infrastructure and Capacity</u></p> <p>Identifying the separate costs of each component in this Mod has been difficult due to a lack of transparency around existing DCC capacity. To properly assess whether the solution is effective, we would require further information around the following:</p> <ul style="list-style-type: none"> • Current utilisation of DCC capacity and related headroom • Current % of connected meters where supplier is requesting HH data (either scheduled or on-demand) • Current % split between scheduled and on-demand requests for HH data 	

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			<ul style="list-style-type: none"> Current success rate of scheduled requests for HH data Current success rate of on-demand requests for HH data <p>This would allow us to identify the gaps between current and required capability/capacity and determine whether the proposed changes and level of investment are appropriate or sufficient.</p> <p>According to their Charging Statements, the DCC have already received ~£3b in funding from consumers. It is difficult to understand how this level of investment is not sufficient to facilitate the collection of HH data from meters on the network. The original IA for the SMIP identified ~£1b in benefits from load shifting, TOU tariffs etc. These benefits can only be fully realised through HH settlement – the effect on the system of the load shifting action is masked by a generic profile in settlement otherwise. Thus, the argument that this transition to HH settlement could not have been predicted is weak.</p>	
Stark	Other SEC Party	Not in current form	<p>The solution currently proposes a new user role for parties, other than Suppliers, who will want to provide the Meter Data Retrieval (MDR) service that will form part of Smart Data Service (SDS).</p> <p>Currently this proposal is aimed at independent operators wishing to participate in MHHS.</p>	Please see the responses to the AIMDA above.

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			<p>It was clear that the MHHS TOM solution allowed for competitiveness in the role of MDRA, as highlighted by discussions & consultations over the future of Supplier agent roles. The Ofgem MHHS SCR was agreed by industry consultation making it difficult to accept that DCC would not have been able to comment.</p> <p>We acknowledge the desire to not affect the current system uses by Suppliers who already have this access, i.e., for certain billing activities, & therefore already able to schedule for consumption to be provided to Settlement.</p> <p>We do not think, however, that the MHHS flag in an “honesty” system is a suitable or robust approach to mitigating impacts to existing processes or managing unpredictable user behaviour because it creates an uneven playing field between supplier and independent organisations. Suppliers could utilise significantly shorter TRTs to retrieve consumption data that they could then use in the settlement process. Creating the MHHS flag could be an unnecessary cost when the same effect can be achieved through an alternative solution.</p> <p>In our view, the best approach would be to require all consumption data retrieval, regardless of purpose, to be via an MDR and using the existing set of TRTs. This would ensure parity between independent and supplier organisations whilst also facilitating efficient capacity</p>	

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			<p>management at the DCC. All scheduled requests for consumption data would be subject to a 24hr TRT and on-demand requests with a shorter TRT, with appropriate incentives to minimise usage, available as required – satisfying both supplier and independent use cases. The potential for duplication is also significantly reduced as only the appointed MDR can retrieve the data. Similarly, the potential for re-use is increased as the data collected by the MDR can then be used in multiple other processes. Existing processes would only be minimally impacted – simply a switch of existing schedules from IS role to MDR role. The process for an existing DCC User to become an MDR would not necessarily be onerous.</p> <p>Additionally, MDRA role should be allowed to access additional data where permissions provided i.e., specifically appointed by Supplier or Customer for all collection activities.</p> <p>If this approach is not viable then the alternative is to amend the proposed solution so that the MDR can have the same access to shorter on-demand TRTs as the Supplier. Following the principle that scheduled requests are preferable and on-demand requests should be minimised (potentially through incentives) then the need for separate MHHS specific TRTs is unnecessary because the majority of requests will be scheduled and so subject to a 24hr TRT anyway. This is true regardless of</p>	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			whether the requester is a Supplier or Independent organisation.	
Electricity North West Limited	Network Party	No	<p>Whilst the proposal will provide a mechanism for accessing Half Hour consumption data for Suppliers and Meter Data Retrieval Agents (MDRA) it does not adequately consider the whole system impact across DCC, DSP and CSP services of multiple parties attempting to retrieve consumption data from a consumers smart meter. Specifically, the modification report do not reference how this proposal would address Network Operator requirements or known system/capacity constraints present in the Communication Service Provider-North Radio Access Network. As such we have to assume these areas have not been given due consideration as part of the preliminary assessment or in developing a solution.</p> <p>As the proposal is currently drafted the exact same data could end up being retrieved from a smart meter two, three or even more times with no perceivable benefit in a capacity constrained network.</p> <p>Electricity North West considers that the most cost-effective model for accessing Half Hour consumption data would be to ensure that it needed to be read from a consumers meter once and once only. After the data has been retrieved it would then be stored in a secure data</p>	<p>It should be noted that the scope of this modification is to provide data for the settlement process, not for other Users or DNO use. The DCC has included the data cache option for SMETS1 in the current proposal as it performs a valuable function in saving SMETS1 requests and overhead and is already in place for one SMETS1 cohort. A cache solution for SMETS2 Devices was considered in early days but not included in the proposal due to the wider impact on the end-to-end security model.</p> <p>The DNO use case is addressed by existing ISFT planned capacity upgrades.</p> <p>The DCC and Elexon have been directed by Ofgem to implement the MHHS solution.</p>

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			<p>repository for retrieval by any authorised user as needed. This would include Suppliers, Network Operators and Other Parties e.g. energy switching service providers.</p> <p>It has been acknowledged by the DCC, BEIS and Ofgem that there are under performance issues with the provision of the CSP North service when attempting to retrieve large payloads of data. Unless whole system requirements are considered as part of developing the solution for this proposal there is a high risk that contention for data and CSP network resources will result in further degradation of CSP North network performance.</p> <p>The optimal model would be to allow DCC (or other nominated parties) to schedule retrieval of all half hour consumption from meters, store this data securely, and then provide services to allow all parties to access the data without the need to actually contact the smart meter itself. This would have the significant advantage of reducing CSP network congestion in all regions and improve data retrieval success rates.</p> <p>The modification report acknowledges some of these questions have already been raised by Working Groups members and solutions are not currently possible given existing SEC constraints. The DCC itself notes that is has only assessed increased capacity needed for MP162 but</p>	

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			<p>notes that there are other use cases (existing and future) which will need to access the same data.</p> <p>The SECMP162 should not be implemented without DCC first engaging Ofgem in a wider holistic review of requirements for access to Half Hour consumption data.</p>	
MHHS Programme	N/A	Yes	<p>We believe the proposed solution broadly meets the requirements of the Market-wide Half-Hourly Settlement (MHHS) Target Operating Model (TOM). The proposed list of Service Requests match those identified by the Design Working Group in development of the TOM. The Detailed Design Team (DDT) of the MHHS Programme (MHHS) would like to better understand the implications of different scheduling options for Service Requests from the Electricity Smart Meter (ESME).</p> <p>The DDT are also keen to discuss the mechanism for identification of the MDR Service by the DCC Data Service Provider (DSP). The current proposal is that the DSP is notified from Registration Services via the Central Switching Service (CSS) using a 'repurposed' data flow. We have identified the need for each MDR Service to have a Market Participant ID (MPID) registered within Industry Standing Data (ISD) and may also require a Market Role Code depending on the solution agreed. If SMRS needs to validate that the MPID of the MDRA is a valid participant, it will use MDD for that. To maintain a list</p>	<p>We will be happy to present the planning scheduling solution to the MHHS Programme.</p> <p>The DCC has provided feedback on the use of the DIP or CSS route. For the purposes of this modification, there is no difference to the solution, but the DCC will consult with the MHHS Programme and Ofgem as to the 'best' possible solution.</p>

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			<p>of valid MDRA MPIDs, they will need to be held against a market role code to be uniquely identifiable. The DCC itself may not need this market role code but we believe it will because otherwise some different process will be needed to provide the validation in SMRS. There appears to be an outstanding question as to whether the Supplier MPID needs to be populated in SMRS where the Supplier is undertaking the MDRA Role.</p> <p>Furthermore, the MHHSP will be implementing a new Data Integration Platform (DIP) for MHHS and think the option of using the new platform to notify the DSP of the MDR User and its Effective Dates should be explored.</p> <p>On the proposed Target Response Times (TRTs) we agree with both the scheduling approach and 24 Hour TRTs, which will suffice for Settlement Purposes. We also agree that Supplier provided MDR Services should not have shorter TRTs than are offered to independent MDR Services where data is being collected for Settlement Purposes. We think a mechanism for identifying MHHS Service requests may be required to ensure a level playing field for independent MDR Services.</p> <p>It should also be noted that processed HH consumption and export data will be available via the DIP for Market Participants that have valid reasons to access the data e.g. Suppliers, Distribution Businesses and the ESO.</p>	

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			These options should also be considered in DCC Capacity Modelling scenarios, since they could reduce the burden on the DCC Systems and Services.	
Utilita Energy Limited	Large Supplier	Yes	We agree with the proposed solution will deliver the required changes to support MHHS.	
EDF	Large Supplier	No	<p>It is not evident that the proposed solution is the most appropriate way of addressing the identified issue, especially as the detailed design for the MHHS arrangements is ongoing and will not be complete until April 2022. Insufficient information is available at this stage to be able to determine whether the DCC's proposed solution is the optimum one for SEC Parties, the MHHS arrangements, or consumers.</p> <p>With the go live of MHHS over three years away and the turbulent market conditions that we as an industry find ourselves in, coupled with the ever changing energy market, it seems highly inappropriate to request that energy suppliers are asked to provide binding and guiding viewpoints on such a granular use of the DCC service requests to support the DCC's technical design at this point. It is understood that the DCC has to make technical changes and investment and is keen to ensure they are ready for the successful and timely introduction of MHHS, but driving the technical design decisions on a set of assumptions that suppliers will make without full</p>	<p>The timeline is constrained by SEC governance steps, Ofgem and the MHHS Programme but can be supported by adopting a flexible solution.</p> <p>The DCC notes that the high-level plan is designed to allow Parties to change their systems as required, and for testing with the MHHS Programme to be completed.</p> <p>Due to the timing of the MHHS programme, it is not possible to wait until the new DSP is in place to implement the required changes for MHHS. Therefore, a solution must be developed and implemented within the existing DSP and form a business-as-usual requirement for the DSP Re-procurement programme.</p> <p>It should be noted that the core DSP component cost, while significant, is not</p>

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			<p>knowledge of future facts is likely to result in a sub-optimal technical outcome for both the DCC and the industry as a whole.</p> <p>An alternative suggestion to requesting assumptions from suppliers to base a design on is for the DCC to take advantage of new technology available where the throughput and infrastructure needs of particular processes can be automatically scaled up and down based on their usage and demand. This could offer the DCC and the industry the opportunity to only purchase and use a base set of capabilities, with this growing as adoption and supplier needs and desires to use these services grow as the market develops. Additionally, this approach could protect the DCC and the industry from incorrect assumptions made by suppliers at this point, or changes to these assumptions that could overwhelm the DCC and ultimately have a detrimental impact on end consumers.</p> <p>It is also not clear what impact the re-procurement of the DSP, which has similar implementation timescales to this change, will have on how and when this Modification will be implemented. What we are really keen to avoid here is suppliers having to fund the cost of change to both the current DSP's systems, and the new incoming DSP's systems.</p>	the largest contributor to the programme cost by some distance.

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Callisto/ Morrison Data Services	Other SEC Party	Yes (with some amend- ments)	<p>The proposed solution broadly resolves the identified issue.</p> <p>The Ofgem approved TOM for MHHS requires the Smart Data Service (SDS), which includes the MDR, which under the TOM is competitive service. We believe that MDRA should be used in all case to collect data for settlement. Whether the MDRA is a supplier or an independent SDS all data for settlement should come through this new approved role under MHHS. This would mean all requests had the same TRTs and the entire load could be managed more effectively by the DCC.</p> <p>We recognise that Suppliers have other user case that require the collection of the same data. We also believe that data should only be collected from the meter once (and used by all who need it) so where data has been collected by the SDS it should be made available for other purposes as well.</p> <p>We believe a 24 hour TRT for all users including MDR should be implemented at go live of MHHS, due to the volume (30 million) of profile data being retrieved/collected.</p>	Please see the responses to the AIMDA above.
OVO (<i>late response</i>)	Large Supplier	No	<p>There is not enough detail in the modification to be able to understand how the Supplier functions in relation to the MDR / MwHHS functions will align and work together. There are opposing drivers in the requirements and not a</p>	SECAS and the DCC are both involved in the MHHS Programme workgroups and will be reiterating these points in these discussions.

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			<p>fully formed understanding of how the Smart Implementation Programme works. Suppliers, and other DCC Users, do not differentiate settlements from billing. The Smart meters, and the overall way we operate, is not driven by splitting out different data elements and functions. The tariff configurations and the way we use data obtained from the smart meters is not set up for the profile data to be split out and used for settlement only and then require the same data to be used for what it is today outside a MWHHS arena. Suppliers still need to operate all elements of the solution, not just pulling out a singular data set for settlements, and will still be doing so going forward. Until the end point solution, including the changes actually required, have been agreed, it is nearly impossible to state that the solution put forward will effectively resolve the identified issue. It is fair to say the issue has not fully been identified, especially when the matter to establish all that has not yet been done and the costs applicable are so large.</p> <p>Although we fully support the need to get profile data into settlements, we currently use this data for numerous functions and processes, including on demand and scheduled purposes. We've already paid for the systems to leverage those processes and would like to understand how the costing for this will be borne, and shared, by others outside the SEC Change process. Especially when</p>	<p>At this time, no changes to the charging methodology are proposed under MP162. This would be a significant change beyond the scope of this modification and would likely delay the progression of the MHHS changes. We would be happy to consider this with Parties more widely separately to MP162.</p>

Question 1				
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			<p>matters of DCC costs, including getting Impact assessments on not fully finalised solutions and undecided outcomes, will be levied upon their Users, some of which are not involved in any way with MWHHS in any way. The DCC costing / charging model does not factor this and it would be good to understand how this will be achieved. As has been discussed in the working groups, the way Smart is designed and works is the Supplier controls the overall management of the metering and communications and none of the changes in this Mod will be changing that. The Supplier is still responsible for the meter, the management of the DCC provided CH and the issues around WAN. This also includes tackling the need for replacement of devices and maintenance. If changes are needed to any of that, they will impact the SEC, and the way Users interact with the DCC, and will need either changes to this Mod or new Mod (s) to tackle this.</p>	

Question 2: Do you agree with the proposed implementation approach?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	Whilst we agree that the SEC Modification needs to be implemented ahead of the programme go live date, we are concerned that timescales are tight and therefore solutions and refinement might be rushed through in order to meet the deadlines without necessarily being given appropriate consideration.	The existing timeline has been developed and agreed between Ofgem, SECAS and the DCC to ensure there is adequate time for consultation on the solution design, and the subsequent development, testing, and implementation of the solution. The timeline also allows for all Parties to plan and develop their changes relating to MHHS.
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	No	The proposed implementation approach in the modification report is lacking in detail and only provides a final date – November 2023. There will be several stages to implementation that need to align with milestones in Ofgem's MHHS Implementation Timetable. First, the test scenarios and full requirements for the MDR UEPT process (incl. security & privacy) need to be defined and form part of the Design baseline in April 2022 (M5). Secondly, a form of the solution needs to be ready for System Integration Testing (TE2) in August 2023 to allow potential MDRs to test the functionality with their systems. Similarly, the solution needs to be implemented in time for the Qualification phase (MT6b) in January 2024.	<p>The existing timeline has been developed and agreed between Ofgem, SECAS and the DCC to ensure there is adequate time for consultation on the solution design, and the subsequent development, testing, and implementation of the solution. The timeline also allows for all Parties to plan and develop their changes relating to MHHS.</p> <p>A full timeline including deliverables and testing plans will be delivered as part of the Impact Assessment.</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			Participants need as much time as possible to design, build and test their SDS system, which could include an MDR function, before the qualification period ends and the migration begins. If implementation of MP162 is going to be delayed, the Programme needs early visibility of this so evidence can be presented to Ofgem to shift any relevant Milestones back.	
Stark	Other SEC Party	No	The proposed approach is lacking in detail and only provides final date – November 2023. There are several activities in the implementation process that need to be aligned with milestones in Ofgem’s MHHS timeline. First, the test scenarios and UEPT requirements need to form part of the Design Baseline in April 2022. Secondly, a form of the solution needs to be available for System Integration Testing in August 2023. Finally, the solution needs to be implemented in time for the Qualification phase in January 2024. Early visibility of any delays to implementation is important so that impacts to Programme milestones can be assessed.	<p>The existing timeline has been developed and agreed between Ofgem, SECAS and the DCC to ensure there is adequate time for consultation on the solution design, and the subsequent development, testing, and implementation of the solution. The timeline also allows for all Parties to plan and develop their changes relating to MHHS.</p> <p>A full timeline including deliverables and testing plans will be delivered as part of the Impact Assessment.</p>
Electricity North West Limited	Network Party	No	As noted in the response to Question1. The proposed approach does not adequately consider the whole system impact across DCC, DSP and CSP services of multiple parties attempting to retrieve consumption data from a consumers smart meter – such as Network Operator	Please see the response to Electricity North West Limited under question 1 above.

Question 2				
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			requirements or recognised system/capacity constraints present in the CSP-North service.	
MHHS Programme	N/A	Yes	We note the proposed implementation date of November 2023 is out-with the Ofgem Published MHHS Timetable which envisages DCC User Interface Testing to commence in April 2023. However, it is acknowledged that there will be a re-base-lining activity after the design phase which will take into account the latest view of the MHHS Programme plan.	Testing of the DCC components will be completed ahead of this time; if required, the DCC will create test stubs to the MHHS solution. The timetable for developing the interface will be developed with the MHHS Programme.
Utilita Energy Limited	Large Supplier	Yes	Yes, DCC system changes must be completed prior to MHHS implementation. November 2023 SEC release provides the DCC with the most time possible to implement and test changes to its system.	
EDF	Large Supplier	No	<p>The implementation approach for these changes is not clear from the Modification report. This only sets out the proposed implementation date, not how the changes would be delivered; specifically, it is not clear what changes would be required to SEC technical products like the DUIS, and whether parties (and specifically suppliers) would be required to upgrade to a new version of the DUIS as a result of these changes. These questions have a significant impact on how and when these changes are implemented.</p> <p>There has always been an assumption made that parties would not be 'forced' to upgrade to any new version of the</p>	As noted in the response to the AIMDA under question 1, in response to the Design reviews, the DCC has now removed the proposed 'MHHS' Attribute on the MHHS Service Requests from the solution. As a result, the changes to the DUIS to support the solution will not require existing Users to uplift to this new version to be able to operate MHHS. However, any Users who wish to operate under the new MDR User Role would need

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Question 2				
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			<p>DUIS at the point it was implemented, and that the DCC would always maintain at least two 'live' versions of the DUIS to enable a staggered upgrade approach. From the information provided in the Modification Report it appears that there isn't a 'no change' approach in this instance; even if suppliers were to choose to continue to retrieve data themselves for use in settlement, they would need to make changes to flag the requests as being for MHHS purposes or not.</p> <p>The implications of these changes for versions of the DUIS, and what that would then mean for DCC Users, is really not clear from the information in the Modification Report. It is therefore impossible to determine whether the proposed implementation approach is appropriate at this stage.</p> <p>As noted above, it is also not clear what impact the re-procurement of the DSP, which has quite similar implementation timescales to this change, will have on how and when this Modification will be implemented. This is not mentioned in any of the documentation. What we are keen to avoid here is suppliers having to fund the cost of change to both the current DSP's systems, and the new incoming DSP's systems.</p>	<p>to be operating on the new version introduced by MP162.</p> <p>The re-procurement of the DSP will have no impact on this solution, as the re-procurement will only occur after the implementation of MP162. Any changes made to the DSP for MP162 would be included in the reprocured DSP.</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Callisto/ Morrison Data Services	Other SEC Party	No	The current implementation approach only considers the final implementation into a production system. The implementation plan needs to allow time for the creation of the test environments and tools for the qualification process ahead of production go live in April 2024.	A full timeline including deliverables and testing plans will be delivered as part of the Impact Assessment.
OVO (<i>late response</i>)	Large Supplier	No	Although we agree with the approach dates we must call out that we have serious concerns with actually being able to meet those dates – additionally, the Modification report does not detail how this will be implemented, just the time scales needing to be met. There are still several design impacting decisions needing to be made, that have far reaching impacts, and costs, to DCC Users and SEC Parties, that are outstanding. It does not seem likely they will all be ratified and in place by May 2022, allowing for all the elements on the SEC Change process to happen. This seems very ambitious when there are so many bits still being looked at in the Level 4 working groups that rely on DCC changes to happen.	A full timeline including deliverables and testing plans will be delivered as part of the Impact Assessment. We acknowledge that the wider end-to-end MHHS solution is still under development. While the DCC's technical solution shouldn't need further change, we acknowledge further modifications may be needed to adapt the MP162 solution in response to the wider programme.

Question 3: Will there be any impact on your organisation to implement MP162?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	There should not be any impact, although we are keen to understand some of the finer details to ensure that this is the case. We are also of the understanding that this modification will have no impact to existing smart metering services.	We note that the DCC's design principles specifically state there should be no impact on the existing Smart Metering System.
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Yes	<p>AIMDA members wishing to provide an MDR service will be required to;</p> <ul style="list-style-type: none"> • Accede to SEC under "MDR User" category • Build or procure DCC adapter • Undergo UEPT for the MDR role • Conduct security and privacy audits • Internal development for Smart segment MPANs <p>A potential negative impact is that if the solution is not fair, then we will not be able to service Smart meters in an equivalent manner to AMR, which could have further impacts on settlement and customer experience.</p>	The scope and requirements have led the DCC to design a solution that allows the MDR to retrieve data, but which envisages leaving the maintenance and running of the meters to the installing Supplier.
Stark	Other SEC Party	Yes	As an Other SEC party, the appropriate User Entry Process Testing (UEPT) for the MDR role will be required. This will, however, be incorporated into development requirements for MHHS programme in its entirety.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	No	As drafted the solution does not impact Network Operators.	
MHHS Programme	N/A	Yes	The MHHSP will need to be fully involved with the implementation of MP162 to ensure it aligns with other MHHS integration activity.	We agree, and SECAS and the DCC will be working closely with the MHHS Programme through this modification's development and implementation.
Utilita Energy Limited	Large Supplier	Yes	<p>This modification supports a wider change that impacts all Suppliers and how they operate and settle electricity on a day-to-day basis. Our response is provided within the scope of <i>only</i> MP162 and does not cover the total impacts of implementing MHHS.</p> <p>The primary impact will be changes to our systems which interact with the CSS, to deregister appointed MDRAs, as well as any changes associating SRs being sent for MHHS purposes.</p>	
EDF	Large Supplier	Yes	We have to assume that we will be impacted by any changes made as a result of this change. However, in line with the comments in our response to question 2, it is almost impossible at this stage to determine what those impacts would be without a clearer idea of the changes that will be made to the technical specifications, and especially the DUIS. It is not clear whether, as a supplier, we would be required to make changes and implement a	As noted under question 2, the DCC does not envision any mandatory DUIS changes being needed to deliver MP162 that would require existing Users to have to uplift to deliver MHHS.

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			new version of the DUIS even if we intended to retrieve the data ourselves using the existing SRVs.	
Callisto/ Morrison Data Services	Other SEC Party	Yes	<p>We will need to Accede to the SEC as an MDR user.</p> <p>Create processes to generate DCC requests and process responses.</p> <p>Undergo UEPT for the MDR role.</p> <p>Conduct security and privacy audits.</p>	
OVO (<i>late response</i>)	Large Supplier	Yes	<p>Being that assumptions on how this will work, and changes to the way Suppliers will operate under MWHHS, we will be directly impacted across many areas of both our day to day operations and how we interact with our devices via the DCC. As it stands today, those changes have not been fully baselined and still need to be discussed. Until we discover how we will operate in this market, using a Smart meter via the DCC, it is impossible for us to define the impacts. Anything that changes our interaction with the DCC beings impacts to us and our solutions.</p>	

Question 4: Will your organisation incur any costs in implementing MP162?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No costs	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	More than £1m	Combined costs of all our member organisations to become MDRAs will be > £1m. This is just one part of a much larger bill for implementing MHHS.	
Stark	Other SEC Party	Yes (estimate not stated)	Costs will be required to conduct UEPT and to provide access to the DUIS; this will also be incorporated into the development costs for participation in the MHHS programme in its entirety.	
Electricity North West Limited	Network Party	Yes (estimate not stated)	MP162 as drafted does not impact Network Operators but will have the effect of further increasing our contribution towards the DCCs charges in order to implement a solution for which it is not clear the CSP infrastructure can support. Whilst we are asked that respondents exclude their share of the central costs from their responses, the proposed cost of this solution is unprecedented in SEC modification history and stands at £30-60 million and as such we must refer too it in our rationale.	
MHHS Programme	N/A	-	N/A	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Up to £100k	<p>Most of the costs associated with the total MHHS programme will arise as DCDA and wholesale costs. We have excluded these, as well our share of the total cost of this modification, from our response to this question.</p> <p>The specific costs with implementing MP162 will be on development and DBT costs associated with our CSS systems. We expect these changes to take around 3 months of DBT time, at a cost of ~75k.</p> <p>We have also not included our ongoing costs of running MHHS processes. We could provide the total programme costs if requested.</p>	
EDF	Large Supplier	More than £1m	<p>In line with our responses to previous questions it is impossible at this stage to be able to estimate the likely costs that we would incur as a result of MP162 given the lack of detail regarding the technical design and the implications for the DUIS. We have to assume the worst case and that we will be required to implement a new version of the DUIS and the back-end changes that would support that new version, in which case the costs are likely to be significant.</p>	As noted under question 2, the DCC does not envision any mandatory DUIS changes being needed to deliver MP162 that would require existing Users to have to uplift to deliver MHHS.
Callisto/ Morrison Data Services	Other SEC Party	Unknown at this time	Further detail is required about MDRA processes under the MHHS programme.	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
OVO (<i>late response</i>)	Large Supplier	£500k-£1m	This is a guess based on the initial costs that have arisen through the preliminary work on this Mod and costs we've faced in previous changes when it comes to the DCC and the SEC itself. But, without a full understanding of the solution and the changes themselves, this figure could decrease dramatically (noting we can already obtain the data needed for settlement without this Mod) or increase (being that requirements on how it works seem to be arising without consideration on the impact or how it works. A full appreciation of how Smart works must be factored when deciding how to implement MwHHS.) – we will only know this once it's being decided. Ultimately the costs for the SEC changes under the Mod will be borne by SEC Parties so any changes will come our way.	

Question 5: How long from the point of approval would your organisation need to implement MP162?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	N/A	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Unknown	The length of time from approval will depend on the DCC's own rate of implementation. There is much we cannot do until something has been built for us to test with and against. Similarly, we cannot provide an answer to this question without knowing the full list of UEPT requirements on MDRs.	
Stark	Other SEC Party	Unable to evaluate currently	This would depend on testing availability etc. at the DCC	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	-	N/A	
Utilita Energy Limited	Large Supplier	N/A	Approval for November 2023 SEC release provides enough time for Utilita to make any required changes to support implementation of this modification.	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Over 12 months	Again, it is impossible to provide an accurate estimate, but assuming the worst-case scenario that we would be required to implement a new version of the DUIS as a result of MP162 we would need at least 12 months' notice to be able to implement these changes. Not only do we need third party service providers to make changes to their products, but we would need to design, build and test changes to our internal systems to interface with the new version of DUIS.	As noted under question 2, the DCC does not envision any mandatory DUIS changes being needed to deliver MP162 that would require existing Users to have to uplift to deliver MHHS.
Callisto/ Morrison Data Services	Other SEC Party	Unknown	Further detail is required about MDRA processes under the MHHS programme.	
OVO (late response)	Large Supplier	8-12 months*	<p><i>* As long as the approval includes full details of the changes we would need to make and the changes DCC will making, it should be in the region of 8 to 12 months.</i></p> <p>We are explicitly linked in being able to implement any of the changes to the way we interact with the DCC and how we need to change the way we operate the end to end processes with the SMiP. Some of which is very quick to change, others, factoring all the other coincidental changes taking place in a similar time, affect our ability to manage the changes. Noting we do not know, at this time, the amount of changes needed.</p>	

Question 6: Do you believe that MP162 would better facilitate the General SEC Objectives?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We agree that this modification would better facilitate SEC Objective (b).	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Not in current form	<p>Not fully in its current form, incorporating one of the proposed amendments in Q1 would better facilitate the objectives. Furthermore, it is surprising that no view has been given against SEC Objectives (a), (d) and (e). An effective solution would better facilitate these specific objectives, especially considering they relate to key benefit areas in Ofgem's business case for MHHS (consumers, competition and networks). We provide our own assessment below:</p> <p>(a) the proposal will facilitate the efficient operation of Smart Metering by maximising benefits realisation through extraction of HH data. The current solution does better facilitate this objective.</p> <p>(d) a successful solution will facilitate and promote effective competition between supplier and independent organisations. The current solution does not better facilitate this objective because there is not parity.</p> <p>(e) through the Dynamic Dispatch Model, Ofgem identifies between £100m and £1b in Network benefits from</p>	<p>We acknowledge these additional views and will highlight them in the Modification Report.</p> <p>The DCC notes that the specific function for network design is not included in the scope of this modification.</p>

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			MHHS ¹ . Therefore, a successful solution should facilitate innovation in the design of networks through access to HH data. The current solution does not better facilitate this objective because it has not been considered.	
Stark	Other SEC Party	Not in current form	We believe that MP162 could also better facilitate SEC objectives (a), (d) & (e) if the suggested caveats of Q1 are applied. These objectives are aligned with key benefits areas in Ofgem's business case for MHHS (consumers, competition and networks) so it is important for this solution to facilitate them.	We acknowledge these additional views and will highlight them in the Modification Report.
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Yes	We agree with the Proposers assessment against the General SEC objectives.	
Utilita Energy Limited	Large Supplier	Yes	B – allows for appropriate changes to be made DCC systems to support its MHHS licence conditions. C – allows for en masse collection of MHHS data to provide accurate and appropriate information to customers with regard to their product offering. G – SEC changes are required to support the wider MHHS programme, this modification achieves this, therefore efficient implementation of this Code.	

¹ Ofgem, MHHS: Final Impact Assessment, Table 20, p91, difference between “baseline” and “including distribution network benefits” across low and high load shifting scenarios

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	No	While we agree that making changes to the DCC systems to ensure that MHHS and the associated benefits that it brings would benefit the General SEC Objectives (and specifically SEC Objective b as noted in the report), we are not able to agree that the current proposed solution is appropriate and would better facilitate the General SEC Objectives.	
Callisto/ Morrison Data Services	Other SEC Party	-	-	
OVO (<i>late response</i>)	Large Supplier	Yes	We agree, in principle, that this will better facilitate the SEC Objectives identified in the Mod report although we still have concerns on what MP162 is going to deliver and how. It may be fairer to state we believe the 'intent' of the Mod will better facilitate the General SEC Objectives, once the solution(s) are finalised.	

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP162 is implemented?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	Based on Ofgem's prediction, consumers would benefit.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Yes	Non-domestic consumers with Smart meters installed will be able to appoint independent meter and data agents, like they can for AMR. This will allow them to enjoy the benefits of competition around cost, innovation and service quality.	Non-domestic customers are out of scope. However, the DCC is engaging with the MHHS programme on this as it might impact Suppliers and this modification.
Stark	Other SEC Party	Yes	There will be benefit to consumers if the MDRA role demonstrates fair competitiveness, to better facilitate the consumer's right of choice rather than being restricted by the Supplier role. i.e. non-domestic consumers, with Smart meters should be able to appoint preferred agents as is currently possible with AMR.	We note this comment but do not believe the MP162 solution would prevent this.
Electricity North West Limited	Network Party	No	Access to a consumers consumption history will be a key requirement for future provision of switching services. It is not clear that SECMP162 considers this future use case and as such it is likely that further costs will be incurred as a result in future.	MP162 has focused on delivering the requirements for MHHS as set out under the TOM. Other future use cases have not been considered as these are out of scope.

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	N/A	Yes	We believe MP162 will help achieve the consumer benefits as set out in Ofgem's Full Business Case for Settlement Reform.	
Utilita Energy Limited	Large Supplier	No	There will be no specific benefits to consumers because of this modification. The MHHS programme may see more TOU tariffs offered.	
EDF	Large Supplier	Yes	In line with our previous comments, while we agree that making changes to the DCC systems to ensure that MHHS and the associated benefits that it brings would benefit consumers, in line with Ofgem's business case for MHHS, we are not able to agree that the current proposed solution is appropriate and would deliver those benefits in the most appropriate or efficient manner.	
Callisto/ Morrison Data Services	Other SEC Party	-	-	
OVO (late response)	Large Supplier	Yes	Although we can, as Active Import and Export Suppliers using the DCC already, fully believe we can perform all that is currently required of us to achieve the benefits set out by the MWHHS, we appreciate the costs of the changes, and all the unknown changes working their way through, will impact our consumers. The benefits are unclear as the Smart solution, as it is, allows for all	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			required but the changes DCC needs to make will, eventually, be borne but customers somehow.	

Question 8: Noting the costs and benefits of this modification, do you believe MP162 should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	No	<p>We don't believe that this modification is in a suitable position to be approved. The range of DCC costs is significant and there is a lot more detail required around the solution design.</p> <p>We also note that there has been no legal text provided for approval and without legal text showing the changes to the SEC, this is not a complete modification.</p> <p>That being said we support the intent on this modification.</p>	The responses to questions 9-15 of this consultation will help the DCC to provide a more accurate cost for delivery. The remaining areas of the solution and the legal text will be developed with the Working Group and issued for a further consultation before the end of the Refinement Process.
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Not in current form	<p>We believe that MP162 should be approved; however, only if it facilitates effective competition between supplier and independent organisations. This can be achieved through any of the proposed amendments to the solution outlined in Q1.</p> <p>Considering the overall benefits of MHHS, the assessment of "consumer areas" should be more positive. See below for our own assessment:</p> <p>Improved safety and reliability – more frequent collection of consumption data will allow faults to be identified and rectified faster</p>	We acknowledge these additional views and will highlight them in the Modification Report.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Reduced environmental damage – MHHS is a key enabler of flexibility, which will help reduce reliance on carbon and fossil fuel generation, which damages the environment</p> <p>Improved quality of service – increased innovation through HH enabled propositions that will benefit consumers and quality of service</p> <p>Benefits for society as a whole – MHHS will unlock further innovation that will be required to transition to Net Zero efficiently</p>	
Stark	Other SEC Party	Not in current form	<p>We do believe that MP162 should be approved, however; only if it facilitates effective competition between supplier and independent organisations. This can be achieved through any of the proposed amendments to the solution outlined in Q1.</p> <p>The assessment doesn't fully capture the benefits of an effective solution and MHHS more broadly. The view should be positive against every consumer area as the correct solution for MHHS will foster innovation, improvements to service quality and enable an efficient transition to Net Zero through effective competition.</p>	Please see the response to the AIMDA under question 1 above.
Electricity North West Limited	Network Party	No	As per our responses to Questions 1 and 4	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	N/A	Yes	The MHHS Programme will need this modification to be approved in order to implement MHHS.	
Utilita Energy Limited	Large Supplier	Yes	<p>These changes are required to support the mandatory MHHS programme - please refer to our response to Q16 with specific regard to cost.</p> <p>We would not be supportive of any SEC performance assurance related reporting if they were to arise as a result of this modification.</p>	MP162 is not proposing to introduce any performance assurance monitoring.
EDF	Large Supplier	No	Based on the limited amount of information available and our concerns about the way the solution is being progressed, it is not possible to agree that MP162 should be approved at this stage.	
Callisto/ Morrison Data Services	Other SEC Party	Yes	Without MP162 the MHHS TOM can not be implemented. But please see comments in question 1.	
OVO (late response)	Large Supplier	No	Not without a fuller and more in depth understanding of all the changes required and how those changes will impact both us as a SEC Party / DCC User and our ability to operate a Smart meters via the DCC Service. As the SEC defines that behaviour and interaction, all the functions applicable need to be included in the Mod. They are not and some are requiring clear guidance to be established. As such we do not feel the Mod is at a stage where it can be approved. It may require this Mod to be refined into	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			different elements and deliverable to allow DCC to get on with some work and inform SEC Parties of changes, but there are core fundamental items still unclear that preclude that.	

Question 9: Please provide any comments or feedback you may have on the DCC's design principles

Question 9			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	<p>We strongly agree with DP-1, however we are slightly concerned by the sentence in the modification report under Section 4 that states:</p> <p>'Other Party Categories are not expected to be directly impacted by MP162 but may be indirectly impacted by the increased volume of traffic that the MHHS solution is expected to generate.'</p> <p>This potentially contradicts this design principle of not negatively impacting the wider existing smart metering arrangements.</p> <p>We agree with DP-5, however, having read the modification report we are unsure how strictly this will be adhered to. Section 7 states:</p> <p>'SECAS will strive to meet Ofgem's overall timetable; however, this should not come at the expense of making sure the smart metering arrangements are not compromised.' And 'A Working Group member queried if the whole system needs to be reviewed and redesigned to meet future needs, before it reaches a point where it cannot cope with the demand, though conceded this would likely be outside the scope of MP162. They asked whether the DCC had a view on when a full review of the current model would be needed, due to the pipeline of expected changes that will impact on demand. The DCC confirmed wider work is taking place on this. TABASC members also queried whether there is value in reconsidering the end-to-end architecture in light of future capacity expectations.'</p>	<p>We acknowledge the point around DP-1. The validation of the DCC's assumptions will be key to ensuring there is sufficient capacity to avoid any impact on existing traffic.</p> <p>On DP-5, due to the wider MHHS timelines, MP162 is focused on ensuring sufficient capacity is in place to deliver MHHS. The wider work on capacity will take longer to complete; if carried out under MP162 it would mean the DCC changes would not be in place ahead of MHHS go-live.</p>

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Question 9			
Respondent	Category	Comments	SECAS Response
		As a result we don't believe that this design principle will be fully considered to the extent that it perhaps might have been without a strict timescale. To fully include this design principle we believe that more detailed consideration regarding the DCC retrieving and storing this data to be accessed by numerous parties would be required.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	There should be a design principle explicitly around supporting implementation of the MHHS TOM. Similarly, a design principle should be that the solution does not disadvantage one user over another.	The DCC believes the MHHS TOM is not part of the solution design for this modification. The solution design does include the interface to the Elexon system. Regarding the 'no disadvantage' principle, there is one principle indicating no degradation or change of the existing service. The perceived 'unfairness' of limiting the Service Requests available to the MDR User is part of the requirements that the solution is designed to meet.
Stark	Other SEC Party	A central design principle should be that the solution does not disadvantage one party over another. We propose that this should be added. Similarly, there should be an explicit principle around supporting the implementation of the MHHS TOM.	Please see the response to the AIMDA above.
Electricity North West Limited	Network Party	-	
MHHS Programme	N/A	We agree with the design principle.	

Question 9			
Respondent	Category	Comments	SECAS Response
Utilita Energy Limited	Large Supplier	<p>We agree with the DCC design principles. DP-1 is a fundamental principle, MHHS must be implemented in a manner that does not cause any detriment to performance across the DCC System. DCC must adequately test, and report on its testing activities to assure Users there are no wider impacts that affect performance across the DCC System prior to go live. We request specific focus on ensuring DCC capacity is not negatively impacted, primarily through management of traffic arising from MHHS.</p> <p>We are supportive of the principles that re-use current solutions and that wider changes are kept to an absolute minimum.</p>	
EDF	Large Supplier	<p>We agree that the DCC's design principles overall appear reasonable. However, we would reiterate our desire for the DCC to take advantage of new technology available where the throughput and infrastructure needs of particular processes can be automatically scaled up and based on their usage and demand. This could offer the DCC and the industry the opportunity to only purchase and use a base set of capabilities with this growing as adoption and supplier needs and desires to use these services grow as the market develops.</p>	The solution is constrained by the current technology platforms and the required implementation in November 2023.
Callisto/ Morrison Data Services	Other SEC Party	There should be a design principle explicitly around supporting implementation of MHHS TOM.	The DCC believes the MHHS TOM is not part of the solution design for this modification. The solution design does include the interface to the Elexon system.
OVO (late response)	Large Supplier	We agree with the DCC Design Principles as set out in Annex C.	

Question 10: Please provide any comments or feedback you may have on the DCC's scope and service assumptions

Question 10			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	<p>We understand the intent of A8, however we believe that there needs to be further details around this. This is an assumption of an approved consequential change that sits outside the SEC. We wish to see the reference to the other code change that will mean that this assumption is valid. Is this a DTN flow? A CSS message? Who is obligated to send it to who etc. It has also been assumed that an ETD will be populated due to impact on the DSP if it is not but there is no detail or information about the potential impact to other systems and wider industry.</p> <p>With regards to A10, is the intent to put this detail within the SEC or does it fall under another code for the obligation on Suppliers/MDR Users? If this falls outside the SEC, where will it sit? If it is outside the SEC we seek confirmation of the consequential code change details so that we can monitor it's progression.</p>	<p>Further details around A8 will be provided in the Impact Assessment.</p> <p>For A10, we will confirm with the MHHS Programme to agree the appropriate Code for these obligations to sit under.</p>
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	A10 doesn't outline the range of impacts on DCC scope from varying levels of opt-out. It would be helpful to understand assumptions around this.	A10 reflects the DCC's current understanding. The opt-out rate is one of the factors relating to the amount of new traffic introduced by this modification.
Stark	Other SEC Party	No comments	

Question 10			
Respondent	Category	Comments	SECAS Response
Electricity North West Limited	Network Party	-	
MHHS Programme	N/A	Assumption A8 may need discussion as set out in our response to Question 1 where we believe there may be optionality in the way the DSP receives the MDR MPID and EFDs for each MPAN. Additionally, the current design has the Supplier appointing the Smart Data Service (SDS) and the SDS setting the MDR MPID and EFDs within the Registration Services.	This is the DCC's current understanding of the process. If a new interface is introduced, that will be a change to this modification. The DCC considers that the CSS interface would be less risky, easier to implement, and more cost effective than defining a new interface to a new system.
Utilita Energy Limited	Large Supplier	No specific comments to make on any DCC assumptions.	
EDF	Large Supplier	<p>We agree with the assumption noted, with the following exceptions:</p> <p>A1 – it is not clear that the November 2023 SEC Release is the most appropriate release for this to be included in. Not only is this well before the transition to MHHS for smart meters is due to occur, but it limits the time available to fully develop an appropriate solution. This means that the solution is being driven by the timescales rather than the other way around. Progressing this change so early, and before the MHHS end to end design has been baselined, is highly likely to lead to the implementation of a sub-optimal solution that will not deliver the right outcomes in the most effective manner.</p> <p>A10 – it is worth noting that these opt out/in conditions will only apply to consumers where the supplier has been able to move them to the new data access framework (i.e. they are a 'new system' customers in</p>	<p>The timelines have been developed to meet the overall MHHS timetable. MP162 was raised early due to the anticipated DCC lead time to deliver the changes – if the DCC solution was developed after the wider end-to-end design was completed, it is likely the DCC changes would not be delivered in time, jeopardising the overall go-live date. We will reiterate this risk to the MHHS Programme.</p> <p>The November 2023 SEC Release is the last scheduled SEC Systems Release before the expected full MHHS go-live</p>

Question 10			
Respondent	Category	Comments	SECAS Response
		Ofgem's terminology). Where this is not the case the current data access rules would continue to apply and would require domestic customers to opt in to enable their HH data to be retrieved.	<p>date in April 2024. We also note that qualification is due to begin in January 2024 and the SEC changes are needed ahead of this time. However, subject to industry support, we can explore alternative dates such as the February 2024 SEC Release (if converted to a Systems Release) or an ad-hoc SEC Systems Release.</p> <p>The SEC changes will need to be implemented sufficiently in advance of the full MHHS go-live to allow for MDR Parties to undergo accession to the SEC and complete the appropriate UEPT ahead of time.</p>
Callisto/ Morrison Data Services	Other SEC Party	-	
OVO (<i>late response</i>)	Large Supplier	We agree with the scope and service assumptions as set out. We have concerns over the dates and how other large items DCC is required to deliver will all be done in a similar set of releases, noting we do not yet know how big this change is and the impacts.	

Question 11: Please state whether you agree or disagree with the DCC's solution design assumptions

Question 11.1 – design assumption NFR-1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	Assumption lacks evidence. Could be other way round.	The nature of the assumption is that the DCC is assuming this value. Until specific information on the number of Suppliers likely to appoint an independent MDRA is better known, this assumption is based on the DCC's perception of the market.
Stark	Other SEC Party	Disagree	This assumption lacks evidence. The proportion of MDR to Supplier collected data could be the other way round, or it could all be MDR.	The nature of the assumption is that the DCC is assuming this value. Until specific information on the number of Suppliers likely to appoint an independent MDRA is better known, this assumption is based on the DCC's perception of the market.
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree the 75/25 split is a reasonable design assumption	

Question 11.1 – design assumption NFR-1				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Agree	Response to this consultation should hopefully inform the accuracy of this NFR. We can confirm that we intend to gather MHHS in our Registered Energy Supplier User Role.	
EDF	Large Supplier	Disagree	There is no clear basis for this assumption, it is not clear how many (if any) Meter Data Retrieval Users will exist and how much of the data retrieval for MHHS they will undertake.	This is the nature of the assumption. The DCC has asked for further details from Suppliers.
Callisto/ Morrison Data Services	Other SEC Party	Disagree	This is unknown at present, could easily be the inverse of this.	The nature of the assumption is that the DCC is assuming this value. Until specific information on the number of Suppliers likely to appoint an independent MDRA is better known, this assumption is based on the DCC's perception of the market.
OVO (late response)	Large Supplier	-	We neither agree nor disagree as this is clearly an known unknown. What of the other User Roles that use the SRVs in question and their demand? This assumes ONLY Supplier and MDR are applicable.	

Question 11.2 – design assumption NFR-2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	Not applicable to Network Operators.	

Question 11.2 – design assumption NFR-2				
Respondent	Category	Response	Rationale	SECAS Response
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	This assumption should also apply where requested by an MDR	The DCC will extend the assumption to include MDR activities.
Stark	Other SEC Party	Agree	This assumption should also apply where data is requested by an MDR	The DCC will extend the assumption to include MDR activities.
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	Ideally the data will only need to be collected once	
Utilita Energy Limited	Large Supplier	Agree	Large data sets which will significantly increase traffic across DCC network should only be collected once.	
EDF	Large Supplier	Agree	It is logical to assume that a Supplier will only retrieve a set of data from a smart meter once and will share that data within their systems where it is to be used for multiple business purposes.	
Callisto/ Morrison Data Services	Other SEC Party	Agree	A similar NFR should exist for all MHHS data collected by either supplier or MDR	The DCC will extend the assumption to include MDR activities.
OVO (late response)	Large Supplier	Agree	The assumption is that we, as a Supplier, will be requesting this for MWHHS purposes ONLY. The 'assumption' should actually be that we will request it for all the purposes we currently do today, including MWHHS	

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Question 11.2 – design assumption NFR-2

Respondent	Category	Response	Rationale	SECAS Response
			in future. We will not only be pulling this data for MWHHS and then using it for other things too. This may need to be governed by some form of 'acceptable use' or measures as there is nothing stopping a Supplier doing the exact opposite, defeating the NFR and causing demand issues on the overall solution.	

Question 11.3 – design assumption NFR-3

Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	Not applicable to Network Operators.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	See above. MDR collection could replace supplier collection, rather than being in addition to it.	The DCC assumes that existing data retrieval will be maintained and would be additional to collecting MDR data. This will maintain the existing service levels. If MDR retrieval replaces Suppliers' business-as-usual activities, then capacity requirements will decrease (slightly).
Stark	Other SEC Party	Disagree	See above (NFR-2). MDR collection could replace supplier collection rather than being in addition to it.	Please see the response to the AIMDA above.
Electricity North West Limited	Network Party	-	-	

Question 11.3 – design assumption NFR-3				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	N/A	Agree	Suppliers will need to schedule SRVs for use cases that require shorter TRTs.	
Utilita Energy Limited	Large Supplier	Agree	We expect this assumption to be correct, However, we note that some Suppliers may elect to use the data pulled by the MDR for all purposes.	Please see the response to the AIMDA above.
EDF	Large Supplier	Disagree	<p>It wouldn't seem to make a lot of sense for a supplier to pay an MDR to retrieve data from their customers' meters and retrieve the same data themselves, we assume that suppliers will either retrieve all data themselves or outsource the whole activity.</p> <p>What is not clear yet is whether customers (mainly non-domestic customers) would be able to contract directly with an MDR/SDS for the provision of those services; in those circumstances the supplier may need to retrieve data from the meter themselves as they would not have a direct contractual relationship with the MDR, whose contract would be with the customer.</p>	Please see the response to the AIMDA above.
Callisto/ Morrison Data Services	Other SEC Party	Disagree	See above. MDR collection could replace supplier collection, rather than being in addition to it.	Please see the response to the AIMDA above.
OVO (late response)	Large Supplier	Agree	Suppliers will still pull this data and MDRs will be on top of that.	

Question 11.4 – design assumption NFR-4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	Whilst daily collection can be the preference, Users should be free to offer different service levels and collection approaches.	The daily requirement has been taken as the worst-case scenario but Users would be free to collect data at alternative frequencies.
Stark	Other SEC Party	Disagree	Whilst daily collection should be the preference, Users should be free to offer different service levels and collection approaches.	The daily requirement has been taken as the worst-case scenario but Users would be free to collect data at alternative frequencies.
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree that MDRs will collect the HH data and a Register Read on a daily basis. The collection of that daily Register Reads will allow for estimation processes where the HH Data is unavailable.	
Utilita Energy Limited	Large Supplier	Agree	We will collect register reads and profile data daily.	
EDF	Large Supplier	Agree	This appears to be a reasonable assumption at this point in time but may change as a result of the progression of the end to end design for MHHS.	

Question 11.4 – design assumption NFR-4

Respondent	Category	Response	Rationale	SECAS Response
Callisto/ Morrison Data Services	Other SEC Party	Disagree	Whilst daily collection can be the preference, Users should be free to offer different service levels and collection approaches.	The daily requirement has been taken as the worst-case scenario but Users would be free to collect data at alternative frequencies.
OVO (<i>late response</i>)	Large Supplier	Agree	This makes sense as an assumption to make. It will vary from Supplier to Supplier in how they behave as there are no restrictions, neither are there upon any others that can retrieve this data that may need to be factored.	

Question 11.5 – design assumption NFR-5

Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	Based on this assumption, the MDR should have the same access to shorter on-demand TRTs as Supplier. The number of on-demand requests should be low for both parties if scheduled requests are reliable. Incentives should be created to minimise on-demand requests and DCC performance measures implemented to monitor success rate of scheduled requests.	Introducing transaction-based charging would be beyond the scope of MP162 but could be considered separately to this if there was support from Parties to do so. The DCC notes that the response implies that a scheduled approach is agreeable.
Stark	Other SEC Party	Agree	Based on this assumption, the MDR should have the same access to shorter on-demand TRTs as the Supplier. The number of on-demand SRVs should be low for both	

Question 11.5 – design assumption NFR-5				
Respondent	Category	Response	Rationale	SECAS Response
			parties if scheduled requests are reliable. Incentives should be created to minimise on-demand requests and DCC performance measures implemented to monitor the success rate of scheduled requests.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree that the SRVs should be scheduled wherever possible. It should be noted that where the first scheduled attempt by the MDR fails to collect data the MDR may need to make and on-demand request to fulfil its Settlement obligations.	
Utilita Energy Limited	Large Supplier	Agree	Scheduling will allow DCC to make best use of its system and reduce the costs of implementing this modification.	
EDF	Large Supplier	Agree	This appears to be a reasonable assumption at this point in time but may change as a result of the progression of the end to end design for MHHS.	
Callisto/ Morrison Data Services	Other SEC Party	Agree	-	
OVO (late response)	Large Supplier	Agree	It does not make sense to do this any other way, unless by exception and for a valid reason. Not as the norm.	

Question 11.6 – design assumption NFR-6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	Scheduled requests are efficient both for the requesting party and the DCC, they should be the preference. Ability for on-demand requests is important as a back-up.	
Stark	Other SEC Party	Agree	Scheduled requests are efficient both for the requesting party and the DCC, they should be the preference. Ability for on-demand requests is important as a back-up.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree that a backstop on demand request may be made by Eligible Users where scheduled requests have failed to return data where such data is required for MHHS	
Utilita Energy Limited	Large Supplier	Agree	If Schedule readings do not return a response, on-demand requests will be issued to obtain the data.	
EDF	Large Supplier	Agree	This appears to be a reasonable assumption at this point in time but may change as a result of the progression of the end to end design for MHHS.	
Callisto/Morrison Data Services	Other SEC Party	Agree	-	

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Question 11.6 – design assumption NFR-6

Respondent	Category	Response	Rationale	SECAS Response
OVO (<i>late response</i>)	Large Supplier	Agree	-	

Question 11.7 – design assumption NFR-7

Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Agree	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	Ideally, there should not be a separate list of TRTs for MHHS. Supplier and MDR users should both get 24 hr scheduled TRT and shorter on-demand TRT, dependent on SRV. If not possible then the MDR at least needs the option to send a 4.8.1 with a shorter on-demand TRT. Various options for this are outlined in Q1.	Understood, although the requirements currently state this.
Stark	Other SEC Party	Disagree	Ideally, there should not be a separate list of TRTs for MHHS. Supplier and MDR users should both get access to the existing TRTs. If not possible then the MDR at least needs the option to send a 4.8.1 with a shorter on-demand TRT.	
Electricity North West Limited	Network Party	-	-	

Question 11.7 – design assumption NFR-7				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	N/A	Agree	We agree with the scheduling approach with 24 Hour TRTs with on demand options noting the on-demand request may still have a 24 Hour TRT.	
Utilita Energy Limited	Large Supplier	Agree	There should be no change to TRT for MHHS data retrieval.	
EDF	Large Supplier	Agree	This appears to be a reasonable assumption at this point in time but may change as a result of the progression of the end to end design for MHHS.	
Callisto/ Morrison Data Services	Other SEC Party	Disagree	Ideally, there should not be a separate list of TRTs for MHHS. Supplier and MDR users should both get 24 hr scheduled TRT and 16-30sec on-demand TRT, dependent on SRV. If not possible then the MDR at least needs the option to send a 4.8.1 with a 30sec on-demand TRT. This is to support accurate allocation of settlement volumes during a meter exchange.	
OVO (late response)	Large Supplier	Agree	-	

Question 11.8 – design assumption NFR-8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Disagree	We are not sure that it should state that it will be outside the read window. Whilst we would expect the DCC to schedule the requests so as to not impact the existing	

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Question 11.8 – design assumption NFR-8				
Respondent	Category	Response	Rationale	SECAS Response
			services, making this statement means that they would not be able to utilise this time, even if appropriate and able to do so.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	Not using the existing 00:00 – 06:00 read window for MHHS service requests could be inefficient – it would mean losing 6 hours of the 24 hour TRT. It also gives suppliers an undocumented preference within the TRT.	
Stark	Other SEC Party	Disagree	Not using the existing 00:00 – 06:00 read window for MHHS SRVs could be inefficient – it would mean losing 6 hours of the 24 hour TRT. It also gives suppliers an undocumented preference within the TRT.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree with the smoothing approach but note that without being able to identify MHHS Service requests some Supplier Use Cases could be compromised if the existing read window is extended.	
Utilita Energy Limited	Large Supplier	Agree	This should help reduce costs of implementing this modification.	
EDF	Large Supplier	Disagree	It is not clear what impact spreading the demand for MHHS SRVs across the day could have on other critical activities that occur outside of the current reading window	

Question 11.8 – design assumption NFR-8				
Respondent	Category	Response	Rationale	SECAS Response
			– specifically installation and commissioning which is a higher priority than MHHS data retrieval.	
Callisto/ Morrison Data Services	Other SEC Party	Disagree	Schedule MHHS SRV should be spread across the full 24 hours.	
OVO (<i>late response</i>)	Large Supplier	Disagree	Changing the spread of demand for SRVs throughout the day needs to be tested and worked through to ensure there is no detriment, as already been experienced with other functions, to key BAU operations using the Service. If it is proven to not impact other functions then this should be a NFR, otherwise we do not support it.	

Question 11.9 – design assumption NFR-9				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Agree	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	So long as any defined MHHS Scheduling windows apply equally to both categories of User	
Stark	Other SEC Party	Agree	So long as any defined MHHS Scheduling windows apply equally to both categories of User	

Question 11.9 – design assumption NFR-9				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree the DCC (DSP) is best placed to set the schedules for each Communications Service Provider (CSP) and SMETS1 Service Provider (S1SP) to maximise capacity efficiencies.	
Utilita Energy Limited	Large Supplier	Agree	As long as responses are received within the 24hr TRT requirement.	
EDF	Large Supplier	Disagree	As above the “scheduling time periods” that can be used by the MHHS solution could have a significant on other time critical activities that occur outside of the current window – specifically installation and commissioning which is a higher priority than MHHS data retrieval.	The ability to prioritise specific Service Requests is not in scope of this modification. It was part of SECMP0067 ‘Service Request Traffic Management’ , which was rejected.
Callisto/ Morrison Data Services	Other SEC Party	Agree	So long as any defined MHHS Scheduling windows apply equally to both categories of User	
OVO (late response)	Large Supplier	Agree	It is our understanding that the DCC cannot schedule specific time periods to prioritise any SRVs and is required to manage demand to both meet the set out TRTs and also not collapse the network. MwHHS should be included in that, as long as no operational activities are impacted as noted in NFR-8.	

Question 11.10 – design assumption NFR-10				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Disagree	Should this state ‘all MHHS scheduled reads from Suppliers and all MDR SRVs?	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Disagree	See NFR-8	
Stark	Other SEC Party	Disagree	See NFR-8	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	The DCC Scheduling should not impact Supplier BAU processes.	
Utilita Energy Limited	Large Supplier	Agree	On basis there is a distinction between data collection for MHHS purpose and non-MHHS purposes.	
EDF	Large Supplier	Disagree	As above the “scheduling time periods” that can be used by the MHHS solution could have a significant impact on other time critical activities that occur outside of the current window – specifically installation and commissioning which is a higher priority than MHHS data retrieval.	The DCC believes there is capacity outside the current window for the extra demand from MHHS. It will be working with its Service Providers to ensure that the system does not exceed capacity at any part of the day, based on Design Principle 1 (DP-1).

Question 11.10 – design assumption NFR-10

Respondent	Category	Response	Rationale	SECAS Response
Callisto/ Morrison Data Services	Other SEC Party	Disagree	See NFR-8	
OVO (<i>late response</i>)	Large Supplier	Agree	Agree as long as the items noted in NFR-8 are factored. Scheduling of MWHHS demand should not impact or impede other functions.	

Question 11.11 – design assumption NFR-11

Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We seek clarification from the MHHS Programme that ‘This allows an implementation window where the volumes of MPANs using the MHHS services will steadily increase and means that all of the new MHHS User demand will not occur from the point of the DCCs implementation of the MHHS solution associated with MP162.’ is a valid statement. The DCC made a similar statement with regards to another programme which was incorrect as that programme was a ‘big bang’ approach and not a scaling up approach.	The changes to the DCC solution are expected to be implemented in November 2023. The larger programme is expected to go live in April 2024, and there have been statements from that programme that the implementation will be ramped up across Suppliers.
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	Appears to be a sensible approach	

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Question 11.11 – design assumption NFR-11				
Respondent	Category	Response	Rationale	SECAS Response
Stark	Other SEC Party	Agree	Appears to be a sensible approach	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	We agree with the risk based approach. We believe that once the Data Integration Platform is in place capacity issues will be mitigated by access to data via the Data Services. Hence, the DCC should take a cautious approach to the implementation of any additional infrastructure to deliver increased SRV processing capacity associated with MHHS service changes.	
Utilita Energy Limited	Large Supplier	Agree	We hope that enough responses are received to this modification that allows the DCC to make the best-informed decision on how much capacity it needs to procure, noting that User data collection preference may change. Therefore, the risk-based approach seems to be the best way of moving forward.	
EDF	Large Supplier	Disagree	An alternative suggestion to requesting assumptions from suppliers to build from is for the DCC to take advantage of new technology available where the throughput and infrastructure needs of particular processes can be automatically scaled up and based on their usage and demand. This could offer the DCC and the industry the opportunity to only purchase and use a base set of	See the response to Question 9 above. It should be noted that even with a new technology approach, the DCC would still need to define the non-functional requirements for the system and build against those, so that an efficient and effective design could be realised, rather

Question 11.11 – design assumption NFR-11				
Respondent	Category	Response	Rationale	SECAS Response
			capabilities with this growing as adoption and supplier needs and desires to use these services grow as the market develops. Additionally, this approach could protect the DCC and the industry from incorrect assumptions made by suppliers at this point or changes to these assumptions that could overwhelm the DCC and ultimately have a detrimental impact on end consumers.	than over- or under-providing capacity in any solution. This risk-based approach allows the system to be set up in a safe and secure way, rather buying capacity that may never be used, or under provisioning the capacity which could put the system at risk and have a detrimental impact on Users.
Callisto/ Morrison Data Services	Other SEC Party	Agree	-	
OVO (<i>late response</i>)	Large Supplier	Agree	Agree although, at this stage and will the amount of fundamental decisions still not being defined, it may be prudent to take a less than conservative view and increase the risk metric as some items could require considerable change, or none at all. We just do not know.	

Question 12: Please state whether you agree or disagree with the DCC's proposed requirement clarifications

Question 12.1 – requirement clarification REQ-1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	In line A3, the solution should not require changes to GBCS.	
Stark	Other SEC Party	Agree	In line with A3, the solution should not require changes to GBCS.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	Provided the MDR user can place an on demand request for Register Reads from a SMETs 2 Meter and get the data within 24 Hours the 4.1.1 is not essential.	
Utilita Energy Limited	Large Supplier	Agree	We are keen to avoid any GBCS changes as a result of this modification. The daily read can also still be obtained by the MDR User which should suffice.	
EDF	Large Supplier	Agree	We agree with this clarification as it is in line with the principle that no changes will be required to devices (meters) in order to deliver MHHS.	

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Question 12.1 – requirement clarification REQ-1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>However, clarification will be required as to how MDR Users will be able to ensure that they are able to obtain all of the data they are required to for settlement purposes if they will not have access to SRV 4.1.1 for SMETS2 meters.</p> <p>The reinforces the need to have a full end to end design baselined before these changes are progressed so that there is a fully agreed understanding of what data is retrieved from smart meters and how that then feeds into the new MHHS services. It is not sufficient to just refer to HH and daily data or to register reads – there needs to be absolute clarity on exactly what data will need to be shared (including formats), how that data will be shared, and with whom.</p>	
Callisto/ Morrison Data Services	Other SEC Party	Agree	-	
OVO (<i>late response</i>)	Large Supplier	Agree	<p>Agree, we do not wish for GBCS changes and, if they can be at all avoided, then we should encourage this.</p> <p>Otherwise we will need to link both a TSAT and device roll out to be able to achieve MwHHS, and all the costs being upon Suppliers to do so. It does highlight that the MDR will have to treat different meter version differently and it is unclear how they will manage that. It also highlights that it is unclear how MDRs will manage meters, CH's, the</p>	

Question 12.1 – requirement clarification REQ-1				
Respondent	Category	Response	Rationale	SECAS Response
			WAN and HAN at all. Being that only the Supplier can do so.	

Question 12.2 – requirement clarification REQ-2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Agree	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	SRV 4.2 is currently only available as an on-demand request, making this a scheduled request for both generation of SMETS will support efficient MDR operation.	
Stark	Other SEC Party	Agree	SRV 4.2 is currently only available as an on-demand request, making this a scheduled request for both generation of SMETS will support efficient MDR operation.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	Service Request for SRV 4.2 should be capable of being scheduled.	
Utilita Energy Limited	Large Supplier	Agree	This falls in line with the overall solution and allowing DCC to better manage traffic across the network.	

Question 12.2 – requirement clarification REQ-2				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Agree	We agree with this clarification, it is reasonable that SRV 4.2 'Read Instantaneous Export Register Values' is able to be scheduled rather than only being operated 'on demand'.	
Callisto/ Morrison Data Services	Other SEC Party	Agree	-	
OVO (late response)	Large Supplier	Agree	We see no reason why this is not already a SRV that can be scheduled and welcome it's inclusion.	

Question 12.3 – requirement clarification REQ-3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Agree	Whilst we agree with this new requirement we seek further details about the proposed solution and how this would work. We also need to ensure that this notification does not prevent an on demand SRV being sent in order to meet NFR-6	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Agree	This will help the DCC in managing capacity and demand efficiently	

Question 12.3 – requirement clarification REQ-3				
Respondent	Category	Response	Rationale	SECAS Response
Stark	Other SEC Party	Agree	This will help the DCC in managing capacity and demand efficiently	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	Agree	Further to our response to question 1 and NFRs above we believe it is necessary to identify which SRVs are for MHHS purposes as opposed to BAU.	
Utilita Energy Limited	Large Supplier	Agree	Differentiation for MHHS data collection will allow DCC to make best use of its network and in turn, reduce the overall costs of this modification.	
EDF	Large Supplier	Disagree	<p>As noted above the implications of this requirement clarification need to be made clearer.</p> <p>If a User is required to inform the DCC of the intended reason for sending the Service Request to the DCC then this would require a change to the format of the SRV in order to provide that information. If that is mandatory, then that would infer that a User would be mandated to upgrade to a new version of the DUIS, in which case it is not clear what would happen where a supplier was not to do that upgrade and be able to provide that 'flag'. Would they still be able to retrieve data on the basis they do today, and if not, what would the impacts be?</p>	As noted under question 2, the DCC does not envision any mandatory DUIS changes being needed to deliver MP162 that would require existing Users to have to uplift to deliver MHHS.

Question 12.3 – requirement clarification REQ-3				
Respondent	Category	Response	Rationale	SECAS Response
Callisto/ Morrison Data Services	Other SEC Party	Agree	-	
OVO (<i>late response</i>)	Large Supplier	Disagree	This requirement is calling out a change to the SRV? Needing DUIS and MMC changes and changes to the Schema? There seems to be mixed messages on the need for a new version of DUIS but the addition of a new User Role WILL be a change to DUIS as it lists the Users that can send the SRVs. This is a further change. Will this be a major uplift so going up to DUIS 6? (or 7?) or would it be a minor so would be DUIS5.x? Would this be a big bang approach needing ALL Users to uplift or would this be as DUIS releases are managed today where Users only uplift once they are ready? If it is Big Bang this is a dramatic change needing management not detailed in any way in the Modification. Some understanding of the need to uplift DUIS, as there is no way there will not be a DUIS change for MWHHS, is needed.	We have now clarified that there will be a new DUIS version required for MP162, but existing Users will not need to uplift to this to be able to deliver MHHS. Please see the response to EDF under question 2 for further details. Clarification on the implementation approach for the DUIS will be provided in the DCC Impact Assessment.

Question 13 (this question is for Suppliers): What are your anticipated User behaviours regarding the use of MDRAs following MHHS go-live?

Question 13			
Respondent	Category	Response and rationale	SECAS Response
Western Power Distribution	Network Party	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	This question is difficult for Suppliers to answer when there is not yet a full picture of the design.	
Stark	Other SEC Party	N/A	
Electricity North West Limited	Network Party	-	
MHHS Programme	N/A	N/A	
Utilita Energy Limited	Large Supplier	<p>We intend for Utilita to utilise existing User IDs and operate as its own MDRA for all MPANs within its portfolio with regard to MHHS data retrieval. We also intend to use the DCC scheduling services for the collection of this data.</p> <p>We anticipate the need to deregister MDRAs from supply points which we gain through Change of Supplier.</p>	

Question 13			
Respondent	Category	Response and rationale	SECAS Response
		We must caveat that this could change, but this is Utilita's intended use as of the date this response is submitted.	
EDF	Large Supplier	<p><i>[Confidential information provided]</i></p> <p>The end to end design of the new MHHS arrangements is yet to be finalised which will be critical in making these decisions, without that information it is difficult to understand what the optimal solution is likely to be.</p> <p>It is also not yet clear what services are likely to be made available in the market to deliver MHHS and what the costs of these services will be. Again, this information will be critical in making these strategic implementation decisions.</p> <p>As noted previously, it is also not clear whether customers will be able to agree direct contracts for the provision of the MHHS services as they do for some services today. Even if a supplier were to decide to obtain the data themselves, their customers might choose to have direct contracts with providers of SDS/MDR services which would mean that a supplier would be required to implement a 'dual approach'.</p>	<p>Please see the response to Question 1 above.</p> <p>As the commercial proposition is not in place, the DCC cannot comment on the nature of these services.</p>
Callisto/ Morrison Data Services	Other SEC Party	-	
OVO (late response)	Large Supplier	<i>[Confidential response provided]</i>	

Question 14: Would you expect an MDRA operating on behalf of a Supplier to be able to request the retrieval of import consumption data or export generation data sets in support of other non-MHHS purposes?

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Yes	This is how unnecessary duplication can be avoided. The MDRA can collect the data once and distribute it to multiple parties simultaneously as required i.e. to supplier for billing, Data Service for processing and onward transmission to settlement, Distributor for Network charging and the end customer for energy management (with consent). All of these processes can run to the D+1/+2 timescale of a 24-hour TRT. Settlement will always be the primary use for an MDR but the opportunity to re-use data in other processes should not be restricted. It is difficult to limit data use once it has been collected.	We believe this is contrary to the requirements and scope of the modification. As defined the modification relates to settlement data only, and does not force a Supplier to use an MDRA for other activities with that data, nor does it require the MDRA to distribute the settlement data.
Stark	Other SEC Party	Yes	As MDRA collected data will be provided to Settlement, it could be used for more accurate post-settlement activities on behalf of Supplier to restrict duplication of data requests. e.g., billing, energy management for the end user. The post settlement activities can occur after the 24	Please see the response to the AIMDA above.

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
			hour TRT, so re-using the data used in settlement for other processes would be efficient.	
Electricity North West Limited	Network Party	-	-	
MHHS Programme	N/A	No	Companies wishing to use the data for other purposes should set themselves up as an 'Other User' if wishing to use the data for non-settlement purposes. However, it is noted this may restrict the available SRVs.	
Utilita Energy Limited	Large Supplier	N/A	We intend to gather data ourselves. We expect some organisations may defer all data retrieval (i.e. for billing purposes) to MDRA agents - we would not object to this. If it is on behalf of the registered Supplier, then an appointed MDRA should be able to act as directed by said Supplier (subject to privacy, GDPR, security etc)	
EDF	Large Supplier	Yes	As noted previously it seems logical that a supplier would either choose to retrieve all consumption/export data from meters itself or to outsource that activity to a third party - it is unclear what would lead a supplier to actively pursue a dual approach other than direct customer contracts (as noted above). In that case the MDR would logically need to be able to have access to data that suppliers might require for non-settlement purposes. It is not clear what the value of the MDR role is if that is not the case.	

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
			Having two routes to obtain data from smart meters would incur two sets of overheads and likely to increased costs – it is hard to see why a supplier would actively choose to use an MDR in those circumstances. In which case there is a risk that the changes will be made to deliver an MDR service that no-one uses, unless the MDR/SDS has a direct contract with the customer and the supplier is required to use them as a result.	
Callisto/ Morrison Data Services	Other SEC Party	Yes	The principle we support is collect the data only once.	Please see the response to the AIMDA above.
OVO (<i>late response</i>)	Large Supplier	No	The MDRA is a Role set up for the purpose of obtaining data to be used for MWHHS purposes. Why would we expect them to obtain data for no settlement purposes unless that is in addition to the Role and subject to either Elective Services or them acting in the capacity of an Other User?	

Question 15: Would you expect an MDRA operating on behalf of a Supplier to perform any additional activities not listed in the business requirements that would involve any additional data being retrieved from the DCC?

Question 15				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	-	We believe that this is better addressed by Suppliers.	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	Potentially	<p>Whilst we do not expect additional activities involving additional data being retrieved from the DCC, we do not wish to rule this out. The MDR may play a role in fault rectification with the MOP and Supplier but this should not require additional data being retrieved from the DCC. If it is deemed a requirement later, a Modification could be raised to make the MDR eligible for more SRVs.</p> <p>There is no mention of the MDR's access to DCC Services e.g. Self-Service Interface (SSI). It would be helpful to understand what service the DCC is offering around the MDR role to MDRAs? MDRAs will be a customer of the DCC.</p>	The MDR will need to enrol as a new User. As a new User, the MDR would have access to DCC services such as the SMI.
Stark	Other SEC Party	Yes	Difficult to list currently as requirements may change however at this stage there should be flexibility to allow for the possibility of additional activities.	
Electricity North West Limited	Network Party	-	-	

Managed by



Question 15				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	N/A	No	It should be the responsibility of the Supplier to notify the Smart Data Services of any appropriate Alerts or other issues relating to the ESME.	
Utilita Energy Limited	Large Supplier	No	We would not expect the MDR role to perform any additional activities which are not listed in the current business requirements. This suggestion also feels outside the scope of this modification which is to implement SEC changes required to deliver MHHS. This is expanding into areas outside MHHS and suggestive changes should not be progressed under this modification.	
EDF	Large Supplier	Yes	<p>In line with our previous comments it seems logical that a supplier would either choose to retrieve all data from meters itself or to outsource that activity to a third party - it is unclear what would lead a supplier to actively pursue a dual approach other than direct customer contracts (as noted above). In that case the MDR would logically need to be able to have access to additional data/services. It is not clear what the value of the MDR role is if that is not the case.</p> <p>Having two routes to obtain data from smart meters would incur two sets of overheads and likely to increased costs – it is hard to see why a supplier would actively choose to use an MDR in those circumstances, in which case there is a risk that the changes will be made to deliver an MDR service that no-one uses, unless the MDR/SDS has a</p>	The MDR User Role has been developed to meet the MHHS requirements, and so only those SRVs required for this have been considered. If Parties believe there is benefit in expanding the SRVs that an MDR could access, we can consider this.

Question 15				
Respondent	Category	Response	Rationale	SECAS Response
			direct contract with the customer and the supplier is required to use them as a result.	
Callisto/ Morrison Data Services	Other SEC Party	No	-	
OVO (<i>late response</i>)	Large Supplier	No	To do so will require considerable changes outside the current scope of this SEC Mod but does raised the question of how a MDR can effectively manage the overall collection of the Profile data if they cannot understand the scenarios where it is unavailable. As it stands today, and without the full design being worked through, the Supplier is the only party that can manage those and is responsible for ensuring the CH, and meters, operate effectively. This needs further discussion and may require changes as yet not defined.	

Question 16: Please provide any further comments you may have

Question 16			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	-	
Association of Independent Meter and Data Agents (AIMDA)	Other SEC Party	<p>Some further questions we have:</p> <ul style="list-style-type: none"> What level of performance can we expect from the DCC? What happens if they don't deliver? How will DCC performance be monitored and managed under MHHS? How will the DCC charging methodology change with MHHS? How will MDRAs contribute to the cost of maintaining DCC under MHHS? 	<p>The DCC's performance and delivery is regulated by the SEC.</p> <p>At this time, no changes to the charging methodology are proposed under MP162 – please also see the response to Question 11.5 above.</p>
Stark	Other SEC Party	<p>Some further questions we have:</p> <ul style="list-style-type: none"> What level of performance can we expect from the DCC? What happens if they don't deliver? How will DCC performance be monitored and managed under MHHS? How will the DCC charging methodology change with MHHS? How will MDRAs contribute to the cost of maintaining DCC under MHHS? 	<p>Please see the response to the AIMDA above.</p>

Question 16			
Respondent	Category	Comments	SECAS Response
Electricity North West Limited	Network Party	-	
MHHS Programme	N/A	-	
Utilita Energy Limited	Large Supplier	We are keen to minimise the impact which MHHS has on overall traffic. We note that there have been discussions in the working group about caching of data and general re-use which, where possible, could reduce the costs of this modification. We are supportive of continuing these discussions to drive efficient and cost-efficient use of the DCC system.	
EDF	Large Supplier	-	
Callisto/ Morrison Data Services	Other SEC Party	-	
OVO (late response)	Large Supplier	There still does not seem to be a full end to end view of how smart meters operate and the changes needed to that model to allow for MwHHS to be effective and achieve the benefits set out in the TOM. This is especially the case where the matter of how Billing, and all the other functions a Supplier still must carry out using the DCC Service, and the obligations set out in the SEC, remain but are not considered. Hopefully this will all be covered in the detail design workshops and required changes cascaded into the SEC Change process to be picked up.	SECAS and the DCC are both involved in the relevant detailed design workshops and will continue to monitor and contribute to these discussions.