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MP085A ‘Synchronisation of smart meter voltage measurement periods’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP085A 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
BUUK	Networks Party	Yes	We agree with the Proposer that MP085A on balance positively impacts consumers.	
UK Power Networks	Networks Party	Yes	We agree with the solution proposed would address the issue for new Devices by amending the SEC so that once implemented Manufacturers will build Devices with the desired functionality. The proposed legal text was developed by the proposer, SECAS, TABASC and meter manufacturers to support delivering benefits to consumers.	
EDF	Large Supplier	Yes	The solution put forward by the Network Parties seems sensible.	
E.ON	Large Supplier	Yes	No comment.	
ScottishPower Energy Networks	Networks Party	Yes	SPEN believe the solution proposed will provide a consistent approach for DNOs to retrieve and utilise average RMS voltage values from devices more accurately.	
Northern Powergrid	Networks Party	Yes	The proposed legal text has been developed in conjunction with the Proposer, SECAS, the TABASC Chair and manufacturers (via BEAMA) in order to strike a	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			reasonable balance between delivering the benefits to Distribution Network Operators (and hence ultimately to consumers) and the implications for meter manufacturers.	
EDMI Europe Ltd	Other SEC Party	Yes	The proposed solution gives clear guidance to align behaviour across all devices.	
Electricity North West Limited	Networks Party	Yes	No comment.	
Western Power Distribution	Networks Party	Yes	No comment.	
Scottish and Southern Electricity Networks	Networks Party	No	<p>We agree that the proposal put forward will provide a solution to synchronise smart meter voltage measurement periods to the hour and half hour when configured to 30 minutes for all smart meter manufacturers in production. The solution however, proposes changes that could negatively impact current functionality if implemented.</p> <p>We note that there are devices that currently perform this functionality while allowing the user to configure the voltage period in seconds to any desired value. If this solution is implemented, these devices will have a more limited functionality than at present. We would propose to include an MVP, so these devices can continue to provide a higher level of functionality, whilst allowing this SEC modification to bring incorrect/unsynchronised devices up to a minimum standard.</p>	<p>SECAS will raise your concerns at the December 2021 Working Group.</p> <p>In regard to configuring a Device to any desired value, this can still be done, factors of 1800 have not been mandated. (this was part of a previous iteration of the proposed solution – now changed). This modification is simply providing a means that allows re-synchronisation of the time periods should anything interrupt the calculations.</p> <p>In regards to a proposed Minimum Viable Product (MVP), the SMETS document is already an MVP specification document</p>

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			Also noted in the legal text, when a firmware start up occurs, the average RMS voltage value shall not be recorded in log. We note that current devices still record a voltage log entry for every half hour, this allows for more efficient data analytics as this maintains alignment across all 48 half hour periods per day. We would suggest that if the voltage period is not required due to firmware start up, to set this as zero, alternative to deleting the whole log entry.	<p>which allows Manufacturers to build in additional functionality to what is specified.</p> <p>In relation to current Devices recording a voltage log entry for every half hour regardless, if the Device has just started up there isn't any certainty that the value recorded at the end of the measurement period will actually have been recorded over any defined period of time and it is very unlikely to have been measured over the defined measurement period. The feedback from Manufactures was that SMETS was silent as to how the average is calculated where the measurement wasn't made over the measurement period. Ideally the average would relate to the time that the meter had been fully operational, but this isn't codified – so the 'the denominator' could still be 30 minutes even if the ESME had only been operational for 7 minutes. As a result, the Proposer believes it is better not to have a reading at all rather than to have a reading that may not have been correctly calculated.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
				An alternative approach would be to use the maximum possible value to indicate that a reading is inaccurate (as zero is a legitimate value). But the DNO and its relevant system could also infer this if a reading is missing for a particular time interval.

Question 2: Do you agree that the legal text will deliver MP085A?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	No comment.	
UK Power Networks	Networks Party	Yes	We believe the legal text adequately provides the requirements to deliver MP085A that has been jointly developed between the proposer, SECAS, TABASC and meter manufacturers (see also response to question 1).	
EDF	Large Supplier	Yes	The legal text appears consistent with the solution proposed.	
E.ON	Large Supplier	Yes	No comment.	
ScottishPower Energy Networks	Networks Party	Yes	SPEN believe the solution proposed will provide a consistent approach for DNOs to retrieve and utilise average RMS voltage values from devices more accurately.	
Northern Powergrid	Networks Party	Yes	See our response to Question 1.	
EDMI Europe Ltd	Other SEC Party	Yes	The proposed legal text gives clear guidance to align behaviour across all devices.	
Electricity North West Limited	Networks Party	Yes	The Proposed Solution will provide a consistent approach for all ESMEs in relation to Average RMS Voltage Measurement Periods, the modification will bring	

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			improvements to the operation and interoperability of smart meters while also providing Network Parties with more accurate data for them to better manage their networks.	
Western Power Distribution	Networks Party	Yes	We understand that the proposed legal text has been developed and agreed between SECAs, the Proposer, TABASC and meter manufacturers who have all agreed this as a suitable solution.	
Scottish and Southern Electricity Networks	Networks Party	Yes	Based on the proposed solution, we agree that the legal text will deliver MP085.	

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	We agree with the proposed implementation schedule.	
UK Power Networks	Networks Party	Yes	We agree with the implementation approach for the proposed solution because it will provide a consistent approach for all ESMEs in relation to Average RMS Voltage Measurement Periods, bringing improvements to the operation and interoperability of smart meters. Although not specifically mentioned, the timestamp synchronisation will also support alignment of the other data sources held within the ESME for the benefit of consumers.	
EDF	Large Supplier	Yes	However, what is not clear from the Modification Report are the changes that would be made to the TS applicability Tables as a result of this change being approved; whether suppliers would be obliged to cut over to the new versions of the Technical Specifications containing this change, and if so, what the timeframes for doing so would be. If there is an obligation to cut over to the new versions of the Technical Specifications, suppliers would probably need at least 18 months to 2 years to carry out this transition.	For newly manufactured Devices, ESMEs will align to the latest specification as and when they declare it on the CPL. For existing Devices in the field, there is a separate modification (MP085B) which was created should the DNOs want to accelerate the deployment of this functionality. Alternatively, if the implementation is not urgent for existing Devices, then they will naturally adopt the new functionality as

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			If there is no obligation to upgrade to the new versions of the Technical Specifications containing this change, it is not clear whether or when suppliers would do so voluntarily, and therefore when the benefits of making this change would actually be achieved (if at all).	they receive Over-The-Air firmware updates of a version of ESMETS that this mod will be implemented in.
E.ON	Large Supplier	Yes	No comment.	
ScottishPower Energy Networks	Networks Party	Yes	SPEN acknowledge the split between MP085A and MP085B but believe that the meter manufacturers could adopt the changes prior to the proposed dates if this was possible within current implementation cycles.	
Northern Powergrid	Networks Party	Yes	MP085A addresses the issue for new meters and inclusion in the November 2022 SEC release is the earliest time that the modification could be formally implemented. Given that SMETS is currently silent in this area, we believe that there would be nothing to prevent an electricity meter manufacturer implementing the changes earlier if it was more efficient and convenient for them to do so. As the Proposer, we will continue to work with SECAS to progress with MP085B relating to electricity meters already installed.	
EDMI Europe Ltd	Other SEC Party	Yes	The proposed solution addresses the issue identified with minimum disruption.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Networks Party	Yes	No comment.	
Western Power Distribution	Networks Party	Yes	We agree that this should be implemented as soon as possible.	
Scottish and Southern Electricity Networks	Networks Party	Yes	We agree with the recommended implementation approach detailed within the modification report.	

Question 4: Will there be any impact on your organisation to implement MP085A?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	We will be positively impacted by proposed changes which, if implemented, will address current issues by requiring new smart meters record voltages in a logical and synchronised manner. This will enable us to make better decisions regarding our low voltage network.	
UK Power Networks	Networks Party		<p>UK Power Networks will use smart meter average RMS voltage and average consumption data to monitor the performance of distribution networks to manage and identify problems. Once data is available in reasonable quantities from smart meters, this data will be used to develop the most efficient solutions to any identified problem. The uptake in Low Carbon Technologies, particularly electric vehicles and distributed generation is expected to cause an increase in the number of power flow and voltage issues in distribution networks. Voltage and consumption data from smart meters will help identify and manage these issues efficiently.</p> <p>The expectation of Electricity Network Parties during the development of the smart meter technical specification was that the average RMS voltage readings from smart meters would be measured across a consistent period, for</p>	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			<p>example, with the default being for an average to be made across a 30 minute period starting on the hour and again on the half hour as per the half hour consumption profile data. This is not an explicit requirement codified in SMETS or GBCS. Whilst some electricity meter manufacturers' meters work in this way, other manufacturers' meters do not.</p> <p>Average RMS voltage readings that relate to random 30-minute periods are helpful for identifying voltage problems at an individual customer premises. However, without synchronised recording times it will be difficult to:</p> <ul style="list-style-type: none"> • understand voltage issues on Low Voltage feeders affecting more than one customer • identify trends/forecast future voltage issues • validate power flows and voltages on a network model relating to a defined 30-minute period, and hence identify the most efficient solution <p>There are two headline implications if this issue is not addressed:</p> <ul style="list-style-type: none"> • Electricity Network Parties will either need to make conservative assumptions about network voltages which may lead to inefficient solutions 	

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Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			<p>being implemented which result in higher costs for customers, or</p> <ul style="list-style-type: none"> Electricity Network Parties will need to reconfigure the average RMS voltage measurement period from the default period of 30 minutes to one minute and download the higher granularity data so that they can recreate synchronised data in their own systems. This will increase the voltage related traffic on the DCC infrastructure by a factor of 30 and require Electricity Network Parties to develop systems to manage a greater volume of data than originally envisaged. This is not considered to be an efficient solution because it would create new or exacerbate some of the existing performance issues within the DCC and CSP systems and cause additional costs for customers. <p>Implementing MP085A will help to address these two issues by requiring that new smart meters will record voltages in a logical and synchronised manner. Voltage data will be far more useful because it will be aligned to the hour and half hour instead of utilising data that will have inconsistencies. This will enable us to make better informed investment decisions in relation to reinforcement of the low voltage network.</p>	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Yes	If it were approved, and we chose to upgrade to the new versions of the Technical Specifications containing this change, we would need to engage our manufacturers to ensure that new devices were SMETS compliant.	
E.ON	Large Supplier	Yes	This will be delivered via new firmware and, possibly, hardware. Our Assurance teams will need to test this before deployment.	
ScottishPower Energy Networks	Networks Party	Yes	It was the reasonable expectation of DNOs from the outset of the Smart metering programme that the average RMS voltage readings from smart meters would be made across a 30 minute period starting on the hour and again on the half hour as per the half hour consumption profile data. Implementation of MP085A and MP085B will introduce an element of consistency to voltage readings supplied and reduce any approximation of data that is necessary. This will increase the confidence in network related changes being made based on this data.	
Northern Powergrid	Networks Party	Yes	The Root Mean Square (RMS) value is the equivalent of a steady DC value of an alternating voltage or current. Electricity Network Parties use smart meter average RMS voltage and average consumption data to monitor the performance of distribution networks and identify problems. Once there is data available in reasonable quantities from smart meters they plan to use this data to develop the most efficient solution to any identified	

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Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			<p>problem. The uptake in Low Carbon Technologies, particularly Electric Vehicles and Distributed Generation is expected to cause an increase in the number of power flow and voltage issues in distribution networks. Voltage and consumption data from smart meters will help manage these issues efficiently.</p> <p>The expectation of Electricity Network Parties during the development of the smart meter technical specification was that the average RMS voltage readings from smart meters would be measured across a consistent period, for example, with the default being for an average to be made across a 30-minute period starting on the hour and again on the half hour as per the half hour consumption profile data. This is not an explicit requirement codified in SMETS or GBCS. Whilst some electricity meter manufacturers' meters work in this way, other manufacturers' meters do not.</p> <p>Average RMS voltage readings that relate to random 30-minute periods are helpful for identifying voltage problems at an individual customer premises. However, without synchronised recording times it will be difficult to:</p> <ul style="list-style-type: none"> • understand voltage issues on Low Voltage feeders affecting more than one customer • identify trends / forecast future voltage issues 	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			<ul style="list-style-type: none"> validate power flows and voltages on a network model relating to a defined 30-minute period, and hence identify the most efficient solution <p>There are two headline implications if this issue is not addressed:</p> <ul style="list-style-type: none"> Electricity Network Parties will either need to make conservative assumptions about network voltages which may lead to inefficient solutions being implemented, or Electricity Network Parties will need to reconfigure the average RMS voltage measurement period from the default period of 30 minutes to one minute and download the high granularity data so that they can recreate synchronised data in their own systems. This will increase the voltage related traffic on the DCC infrastructure by a factor of 30 and require Electricity Network Parties to develop systems to manage a greater volume of data than originally envisaged. This is not considered to be an efficient solution and would exacerbate some of the performance issues currently being experienced in the CSP N region. <p>Implementing MP085A will help to address these two issues by requiring that new smart meters will record</p>	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			voltages in a logical and synchronised manner. This will enable Electricity Network Parties to make better informed investment decisions on the need or otherwise to reinforce the low voltage network.	
EDMI Europe Ltd	Other SEC Party	Yes	Firmware updates will be required to align entries to the half hour boundaries. Corresponding test cases and design documents will need to be modified to reflect the revised behaviour.	
Electricity North West Limited	Networks Party	No response	No comment.	
Western Power Distribution	Networks Party	Yes	Implementing MP085A will help to address the issue by ensuring that new SMETS meters will record voltages in a logical and synchronised manner. This will enable us to make better informed investment decisions in line with ENA EREC G101 'Voltage Measurements for Assessment of Compliance with Statutory Voltage Limits'.	
Scottish and Southern Electricity Networks	Networks Party	Yes	As detailed in Question 1, if this modification is implemented as detailed in the modification report, we will see a degradation in functionality for a number of devices.	

Question 5: Will your organisation incur any costs in implementing MP085A?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	No costs	No comment.	
UK Power Networks	Networks Party	No costs	UK Power Networks is developing systems to utilise voltage measurements based on the understanding that all timestamps in the ESME will be synchronised. If the timestamps are not synchronised then UK Power Networks will incur additional costs to mitigate this where ultimately this cost is passed onto consumers.	
EDF	Large Supplier	Less than £100k	Very low cost.	
E.ON	Large Supplier	No costs	No comment.	
ScottishPower Energy Networks	Networks Party	Less than £100k	System costs will be minimal as the original SPEN solution was designed to cater for the outcome of the resultant changes. However, the impact of modifications already made to accommodate the current non-synchronised voltage readings will have to be assessed.	
Northern Powergrid	Networks Party	No costs	The systems Northern Powergrid is developing are based on the assumption that voltage measurements would be synchronised as set out in this modification. Hence approval of the modification will reduce the need to incur the additional cost of developing workarounds.	

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
EDMI Europe Ltd	Other SEC Party	Less than £100k	Design/Development/Test costs will be incurred.	
Electricity North West Limited	Networks Party	No response	No comment.	
Western Power Distribution	Networks Party	No costs	No comment.	
Scottish and Southern Electricity Networks	Networks Party	Not applicable	No comment.	

Question 6: How long from the point of approval would your organisation need to implement MP085A?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	No time required	No comment.	
UK Power Networks	Networks Party	No time required	UK Power Networks is developing systems on the basis of all ESME timestamps being synchronised so will not require any additional time.	
EDF	Large Supplier	No time required	Unless there is an obligation to upgrade in which case 18 months would be required.	
E.ON	Large Supplier	No time required	Once we receive the OAT image we can begin roll out as per our usual roll out plans. Once we receive the product, we will need to deploy older stock prior issuing this to field.	
ScottishPower Energy Networks	Networks Party	No time required	The original SPEN solution was designed to cater for the outcome of the resultant changes.	
Northern Powergrid	Networks Party	No time required	The systems Norther Powergrid is developing are based on the assumption that voltage measurements would be synchronised as set out in this modification.	
EDMI Europe Ltd	Other SEC Party	3 months	Time required to schedule and complete design, development and test tasks. Customer approval of	

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Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			firmware changes to support a live cpl submission would be in addition to this and is beyond the control of EDML.	
Electricity North West Limited	Networks Party	No response	No comment.	
Western Power Distribution	Networks Party	Not applicable	No comment.	
Scottish and Southern Electricity Networks	Networks Party	Not applicable	No comment.	

Question 7: Do you believe that MP085A would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	<p>We agree with the Proposer that MP085A better facilitates General SEC Objectives:</p> <p>(a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.</p> <p>(b) Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.</p> <p>(c) Facilitate the efficient and transparent administration and implementation of the SEC.</p>	
UK Power Networks	Networks Party	Yes	<p>We believe that MP085A would better facilitate provisions of the General SEC Objectives, in particular Section C1 Paragraph (a) the first General SEC Objective to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.</p> <ul style="list-style-type: none"> Implementation of MP085 will improve the operation of Smart Metering Systems to record voltage information such that it is more useful to Electricity Network Parties such that they are better able to deliver benefits to consumers. 	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<ul style="list-style-type: none"> Paragraph (e) the fifth General SEC Objective to facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy. Implementation of MP085 will ensure Electricity Network Parties are provided with accurate data in the granularity they require to enable their networks to operate more reliably and to become more efficient as the data is collated. Furthermore, aligning the Average RMS Voltage Measurement Periods across ESMEs will allow Electricity Network Parties to identify issues on Low Voltage feeders and forecast future voltage issues. This will result in Electricity Network Parties providing a higher level of service to consumers. The aligned data is likely to become even more important with the increased uptake of Low Carbon Technologies such as electric vehicles and heat pumps being installed at consumers' premises, and the consequential increased load on the network. 	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Yes	We agree with the proposer that MP085A's implementation will better facilitate SEC Objectives (a), (c) and (g).	
E.ON	Large Supplier	Yes	We believe it supports objectives (a) and (e) of the SEC.	
ScottishPower Energy Networks	Networks Party	Yes	<p>SPEN believe the first (to facilitate the efficient provision, installation, and operation, as well as interoperability) and fifth (to facilitate such innovation in the design and operation of Energy Networks) SEC objectives will be facilitated by the implementation of this change.</p> <p>Providing consistency to the recording of average RMS voltage readings will enable DNOs to make better, more informed decisions regarding network operation, management and development which will ultimately allow more benefits to be delivered to consumers.</p>	
Northern Powergrid	Networks Party	Yes	<p>Our view on whether MP085 better facilitates the General SEC Objectives are set out below:</p> <p>(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. Positive. Implementation of MP085 will improve the operation of Smart Metering Systems to record voltage information such that it is more useful to Electricity Network Parties</p>	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<p>such that they are better able to deliver benefits to consumers.</p> <p>(b) the second General SEC Objective is to enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence. Neutral</p> <p>(c) the third General SEC Objective is to facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems. Neutral</p> <p>(d) the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy. Neutral</p> <p>(e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy; Positive. Implementation of MP085 will improve the operation of Smart Metering Systems to record voltage information in such a way that it can more usefully be used in the</p>	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<p>development of novel techniques for the management of voltage on high voltage and low voltage distribution networks. By way of example this type of data is used as part of the Northern Powergrid Boston Spa Energy Efficiency Trial.</p> <p>(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code. Neutral</p> <p>(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code. Neutral</p>	
EDMI Europe Ltd	Other SEC Party	Yes	By better clarifying expected behaviour, allowing improved consistency across devices.	
Electricity North West Limited	Networks Party	Yes	We agree that MP085A's implementation will better facilitate SEC Objectives (a), (c) and (g). As the Proposed Solution will provide a consistent approach for all ESMEs in relation to Average RMS Voltage Measurement Periods, the modification will bring improvements to the operation and interoperability of smart meters while also providing Network Parties with more accurate data for them to better manage their networks.	
Western Power Distribution	Networks Party	Yes	We feel that this will better facilitate SEC Objective (a).	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Networks Party	Yes	We agree that this SEC modification will better facilitate SEC Objectives A, C and G, as detailed within the modification report.	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP085A is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	Yes, as better-informed management of low voltage networks positively impacts the end consumer.	
UK Power Networks	Networks Party	Yes	<p>We believe there will be benefits to consumers if MP085A is implemented because it will provide Electricity Network Parties with consistent average RMS voltage measurements. This will help Electricity Network Parties to better understand voltage problems at the customer's premises, on the supplying LV network or forecasting future issues enabling remedial action to be taken.</p> <p>Electricity Network Parties will be reliant on the data from smart meters to make informed decisions for network reinforcement. If the data has inaccuracies from misalignment of the timestamps this may lead to decisions being taken to implement LV network reinforcement schemes that are unnecessary. Each scheme would typically be in the region of between £50,000 and £100,000 where this cost would ultimately be passed onto customers.</p> <p>Implementation of MP085 will benefit customers through avoiding unnecessary and costly network reinforcement schemes.</p>	

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	Yes	This will depend whether devices already have the functionality proposed. If there is no obligation to upgrade to the new versions of the Technical Specifications containing this change, it not clear whether or when suppliers would do so voluntarily, and therefore when the benefits of making this change would actually be achieved (if at all).	
E.ON	Large Supplier	Yes	Better views of the network by DNOs ensures more sustainable and secure networks, meaning less risk of supply to the consumer.	
ScottishPower Energy Networks	Networks Party	Yes	As above, providing consistency to the recording of average RMS voltage readings will enable DNOs to make better, more informed decisions regarding network operation, management and development which will ultimately allow more benefits to be delivered to consumers.	
Northern Powergrid	Networks Party	Yes	As set out in our response to Question 3, implementing MP085A will help to ensure that new smart meters will record voltages in a logical and synchronised manner. This will enable Electricity Network Parties to make better informed investment decisions on the need or otherwise to reinforce the low voltage network. Low voltage reinforcement schemes typically cost in the region of £50,000 each, so if availability of higher quality information meant that it was possible to avoid the need	

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			for one scheme per annum in each of the 14 DNO licence area this would result in a saving in the region of £700,000 per annum.	
EDMI Europe Ltd	Other SEC Party	Yes	Improved quality of service.	
Electricity North West Limited	Networks Party	No response	No comment.	
Western Power Distribution	Networks Party	Yes	Implementing MP085A will help to ensure that new SMETS meters will record voltages in a logical and synchronised manner. This will enable Electricity Network Parties to make better informed investment decisions on the need to reinforce the low voltage network.	
Scottish and Southern Electricity Networks	Networks Party	Yes	Alignment of voltage measurement periods will allow SEC parties to analyse voltage data more accurately and use this to aid network upgrade/investment decisions. This will result in a better performing network for its customers.	

Question 9: Noting the costs and benefits of this modification, do you believe MP085A should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Networks Party	Yes	See responses above.	
UK Power Networks	Networks Party	Yes	The modification report states that BEAMA carried out an investigation of the costs to manufacturers for implementing the change in MP085 and have estimated a combined cost for all meter manufacturers to be in the region of £450,000 to £550,000. This cost would be easily offset by the potentially combined costs incurred by Electricity Network Parties as mentioned in question 8.	
EDF	Large Supplier	Yes	Low cost and benefits for Network Parties. (Noting the concerns we have highlighted).	
E.ON	Large Supplier	Yes	The views have been shared at TSIRs, and that DNOs will get benefits from this more harmonised approach to RMS across ESME manufacturers. As it seems like a firmware change that can be easily implemented, this should be accepted and approved.	
ScottishPower Energy Networks	Networks Party	Yes	SPEN believe that the provision of consistent synchronised average RMS voltage readings will improve the quality of information used to operate, manage, and develop the network. Ultimately this will provide more	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			benefits to consumers. The modification should be approved.	
Northern Powergrid	Networks Party	Yes	We are of the view that that additional manufacturers' costs would be more than offset by the benefits that the Electricity Network Parties would be able deliver to consumers, and hence that the modification should be approved.	
EDMI Europe Ltd	Other SEC Party	Yes	We believe this is the best solution to the issue identified.	
Electricity North West Limited	Networks Party	No response	No comment.	
Western Power Distribution	Networks Party	Yes	No comment.	
Scottish and Southern Electricity Networks	Networks Party	Yes	We would like to note the additional cost of a day for a legal text change, as the legal text is drafted prior to implementation, this is normally a standard charge of one day.	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
BUUK	Networks Party	We support this modification.	
UK Power Networks	Networks Party	No comment.	
EDF	Large Supplier	No comment.	
E.ON	Large Supplier	No comment.	
ScottishPower Energy Networks	Networks Party	No comment.	
Northern Powergrid	Networks Party	No comment.	
EDMI Europe Ltd	Other SEC Party	No comment.	
Electricity North West Limited	Networks Party	No comment.	
Western Power Distribution	Networks Party	No comment.	
Scottish and Southern	Networks Party	No comment.	

Question 10			
Respondent	Category	Comments	SECAS Response
Electricity Networks			