SEC
Smart Energy Code

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Smart Energy Code

MP116
'Service Request Forecasting'

Modification Report

Version 1.0

6 December 2021

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has three annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the Data Communications Company (DCC) User Guidance document that accompanies the proposed legal text changes.
- **Annex C** contains the full responses to the Refinement Consultation.

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1. Summary

This proposal has been raised by Graeme Liggett from the DCC.

Currently, for each quarter of the year, DCC Users must submit to the DCC an eight-month forecast of the number of Service Requests that the User anticipates sending. The Proposer has stated that each forecast takes an average of two days for each User to complete. These forecasts are intended to assist in managing demand on the DCC User Interface Services. The DCC has raised a concern that the accuracy of the forecasts does not meet the level required to produce useful data that will improve the management of demand on the DCC User Interface Services.

The Proposed Solution is to remove the obligation on DCC Users to submit their quarterly Service Request forecasts and for the DCC to provide a quarterly report based on actual data. Accuracy will be increased through DCC Users updating the DCC with current trends such as firmware updates and Device installation.

This modification will have a positive impact on SEC Parties as there will be a reduction in resource requirements. It will benefit the DCC and the industry as a whole as more accurate forecasts of system usage will be provided. This modification requires no DCC System changes and if approved, is targeted for the February 2022 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

SEC Section H3.21 requires that by the 15th Working Day of January, April, July and October, each User must provide the DCC with a forecast of future traffic. The forecast must include the number of Service Requests that the User will send in each of the eight months following the end of the month in which the forecast is provided (e.g. in January the forecast would cover February to September). This forecast is intended to provide accurate figures to assist in managing demand for DCC User Interface Services.

What is the issue?

The DCC estimates that each User forecast requires two days of effort per User to produce. However, as the forecasts provide a monthly estimate of Service Requests due to be sent, the level of granularity hinders the accuracy of each forecast.

The DCC believes that the obligation on Users to provide these forecasts should be removed, as the level of accuracy each forecast provides is insufficient. It has suggested that there are more detailed methods of capturing the data required by the DCC to provide worthwhile assistance in DCC User Interface Service management.

The DCC intend to use 12 or more months of actual historical usage data to provide short-term load forecasts (STLFs), medium-term load forecasts (MTLFs) and long-term load forecasts (LTLFs) for load and system performance prediction. Using actual usage data as opposed to forecasted data will enable the DCC to make better use of capacity compared to what is currently in place, as the forecasts will deliver an enhanced level of accuracy.

DCC Load Forecasting types	
Forecasting	**Description**
Short-term load forecasting (STLF)	In this context, STLF handles predictions of 24 hours (next-day predictions) to 168 hours (next-week predictions) and typically relies on time series analysis and modelling. These methods consider variables such as the date (for example, day of week and minute of the day), weather events and, most importantly, historical load.
Medium-term load forecasting (MTLF)	MTLF uses the same information as STLF and handles predictions from one week up to one year.
Long-term load forecasting (LTLF)	LTLF provides predictions over multiple years. These are produced by the regression on input variables, which in addition to historic load, typically incorporate installation and commission projections as well as industry events (for example, the energy price cap).

What is the impact this is having?

If nothing is changed, Service Users will continue to expend resources to submit Service Request Forecasts despite them not providing the accuracy and granularity required, while modelling based on actual usage is a better indication over multiple timescales of future traffic.

Impact on consumers

The issue identified has no impact on consumers.

3. Solution

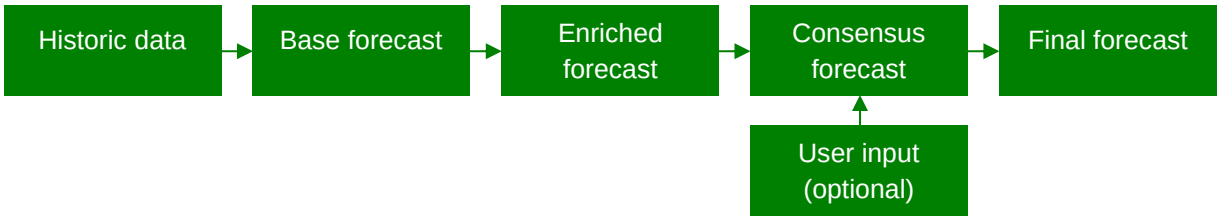
Proposed Solution

The Proposed Solution will remove the obligation for DCC Users to have to provide quarterly eight-month Service Request forecasts to the DCC. Instead, the DCC will produce its own forecasts internally. To maintain a high level of accuracy, the DCC requests that Users provide input into the forecasting process as set out within the DCC User Guidance document, though there is no obligation to do so. The DCC has agreed that it will be responsible for the final sign-off for each forecast.

Producing forecasts

The DCC will use 12 or more months of data relating to Service Requests, installation, and enrolment and adoption to help build a base forecast. The next step will be to apply machine learning to identify and capture key trends and seasonal data which will result in an enriched forecast. Following this, the DCC will investigate extreme data points in the enriched forecast to produce the consensus forecast.

At this point DCC User input will be beneficial. The DCC will incorporate DCC User guidance to bolster forecast accuracy. This will add visibility of trends, the use of previously unused or rarely used Service Requests and changes in Device installation levels. Once complete, the DCC will sign-off the final forecast.



Reporting

The DCC will produce two reports that will be issued to the Panel or a delegated Sub-Committee for review and comment, as well as being made available on the DCC SharePoint for all DCC Users to access.

The first report (Service Request Forecast) will be provided by the 15th Working Day of the months of January, April, July and October. This will set out a forecast of the number of Service Requests that the DCC expects Users will send collectively in each of the six months following the end of the reported month.

The second report (Service Request Forecast Variance Report) will be produced by the 10th Working Day of the months of February, May, August and November, where the DCC shall set out the aggregate number of Service Requests sent by all Users collectively during the previous three months (in total and broken down by reference to each Service Reference Variant (SRV) listed in SEC Appendix E 'DCC User Interface Services Schedule'). This will include a comparison of the actual number for each of the previous three months sent against the numbers most recently forecast for the applicable month. The DCC will provide commentary on any identified reasons for the failure in meeting the expected accuracy.

The second report will also set out the current value (as of the end of the month) for every Monthly Service Metric and a comparison of the current value against the relevant Monthly Service Threshold (the values of which can be found in SEC Appendix E 'DCC User Interface Services Schedule').

User input

The DCC will ask that Users support the production of the Service Request forecasts through their insight, guidance, and cooperation to maintain the monthly target Service Request forecast accuracy of ±10%. The DCC will ask Users to notify it of expected future changes in their own Service Request profile, as well as any changes to their meter installation capacity of a 10% or more increase or decrease from current levels. There will also be an annual DCC-led workshop where Users can capture the assumptions and trends for inclusion into the 48-month Service Request forecast. This is set to take place in October each year.

Please note that although the DCC will ask Users to support the forecast process, there will be no SEC obligation obliging them to do so. Full details are set out in the DCC User Guidance document (Annex B).

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
	Other SEC Parties	✓	DCC

This modification will have a positive impact on Large and Small Suppliers as they will no longer have to provide quarterly eight-month Service Request forecasts. This will result in resource requirements being reduced. SEC Parties will however have the option to provide input into the DCC reports to ensure they remain accurate.

This is also the case for Network Operators as they will no longer need to provide quarterly eight-month forecasts. Once again, the DCC may request input to ensure accuracy levels remain satisfactory.

DCC System

This modification has no impact on the DCC System.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'
- Section H 'DCC Services'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Consumers

This modification will have no impact on Consumers.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC System costs to implement this modification. Any ongoing costs associated with the DCC providing resource will be accounted for through the DCC's price control.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

The majority or Refinement Consultation respondents stated they will not incur any costs as a result of this modification's implementation. One respondent stated its costs would be less than £100,000, though it is unclear how much manual work is required to carry out the functions specified. Please note that following the Refinement Consultation, the DCC agreed to remove the obligation for Users to input into the forecast process to maintain a high level of accuracy.

6. Implementation approach

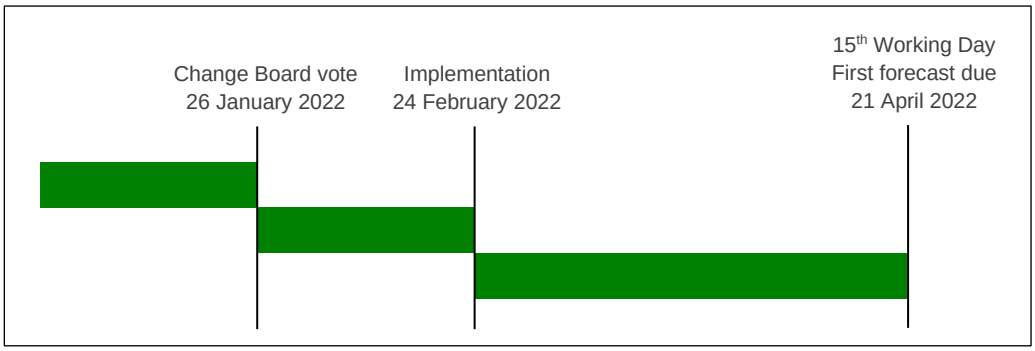
Recommended implementation approach

SECAS is recommending an implementation date of:

- **24 February 2022** (February 2022 SEC Release) if a decision to approve is received on or before 10 February 2022; or
- **30 June 2022** (Jun 2022 SEC Release) if a decision to approve is received after 10 February 2022 but on or before 16 June 2022.

The earliest SEC Release this modification could be implemented in is the February 2022 SEC Release. This modification does not have any DCC System impacts so if a decision is received after the cut-off date, it could be implemented in the June 2022 SEC Release.

The below timeline shows how MP116's implementation will impact the Service Request forecasts following the February 2022 SEC Release.



7. Assessment of the proposal

Observations on the issue

The proposal was presented for initial discussion at the Change Sub-Committee (CSC). CSC members approved of the proposal and were supportive of the obligation of DCC Users to submit quarterly forecasts being removed.

The proposal was presented to each SEC Sub-Committee and received positive feedback. Each Sub-Committee was happy for the proposal to progress, and the Operations Group (OPSG) wished to be kept up to date with the progress of the proposal.

CSC members were happy with the progress made and wanted to make sure it will be clear if the DCC will be adding new requirements to the SEC as well as removing the obligations of DCC Users. One CSC member queried if the changes suggested under this proposal could create new issues later that would need further modifications to resolve. They wanted to ensure that whatever solution is developed is designed to be enduring. Another member supported the proposal to remove forecasting but queried what the DCC was going to put in its place. Members agreed these questions needed to be answered during the Refinement Process.

On 30 November 2021 the CSC agreed that MP116 was ready to proceed to the Report Phase. A CSC member recommended that the location of the guidance document is captured in the legal text. SECAS advise against this as if the location of the document changes, a SEC Modification will have to be raised in order to amend the clause. The DCC will instead investigate a central location where all DCC User guidance documents can be accessed.

Solution Development

Measuring Service Request volumes

The DCC informed the Working Group that to increase the level of accuracy of the forecasts it is using a machine learning approach while exploring the use of advanced data recording computer programs.

A Working Group member requested clarity on how the reporting will work as they have been involved in initial testing and have seen a disparity between the Service Requests they have sent and those recorded by the DCC. The member went on to state that the difference can be very large and has

taken this to the Distributor Issues Group (DIG) for discussion. It was added that reporting on critical commands have been found to be more accurate.

The DCC confirmed that this was caused by filtering attributes from the DCC perspective. The DCC confirmed that its numbers are significantly closer to those of DCC Users once filtering has been removed. Critical Commands were discussed as the DCC applies these in two parts once received from the relevant User. The DCC confirmed that it only counts this as one Service Request.

The Working Group highlighted a key point that although approximately 20 SRVs cause 90% of traffic, this will not always be the case and so the DCC should not solely focus on these SRVs. Currently unused SRVs may well be used in high volumes in the future and so should not be discounted.

Furthermore, the Working Group commented that there will be situations where Service Requests will need to be re-sent. This will result in inaccurate forecasts. For example, firmware upgrades can be unsuccessful across a large volume of Devices, which will then result in a second attempt which cannot be easily forecast.

The DCC stated that each Service Request forecast will predict the volume of distinct Service Requests (excluding retries), as indicated by their Service Request ID, sent over the time period covered by the forecast. There has been one identified exception to this which is SRV 11.1 'Update Firmware' as a single request results in the DCC sending multiple commands to Devices.

The quarterly SR variance report will present the monthly variance between actual and forecast volumes at an aggregate level. The criteria for an SRV to be included in the report is for the SRV to be more than 0.25% of aggregate SR volumes. Currently, this means that approximately 30 SRVs are included and account for 95% of SR volumes in total. Clarification was sought for several SRs. The forementioned SRV 11.1 will be tracked by the Transaction ID due to the nature of the SRV. SRV 2.1 'Update Prepay Configuration' and SRV 8.1.1 'Commission Device' were flagged as possible inclusions. The DCC stated that the current recorded volume of these SRVs means that they are not shown on the list. The DCC took an action to provide the list of SRVs and their respective volumes in a table that is now included within the DCC User Guidance document.

Accuracy of forecast

The DCC confirmed that the aim is to deliver forecasts with an accuracy tolerance of originally ±20% (this has since been altered to ±10%). The DCC commented further that a process will be developed to allow Service Users to feed in intelligence and foresight into the reporting for a higher level of accuracy.

The current SEC Section H 'DCC Services' legal text states that DCC User forecasts have to be accurate within ±10%. The DCC stated that it is confident it can meet this level of accuracy with the new mechanism.

A Working Group member queried what the consequences are for having accurate or inaccurate forecasts. They stated that the current method has become redundant because of its inaccuracy but this has not had an impact on network capacity. SECAS responded that accurately forecasting usage enables the DCC to introduce greater capacity and aids long-term planning. The DCC also stated it benefits Service Providers in helping them manage their own capacity from month to month by projecting usage at a component level.

It was further discussed that Users' forecasts have lacked accuracy for some time, but it has not impacted network capacity. This is due to the DCC developing and producing its own internal forecasts. The DCC reiterated that the intent of this modification is to formalise the new process for

producing more accurate forecasts and have it codified into the SEC. SECAS also stated that the current obligation in the SEC does not fulfil its purpose and this modification aims to address this.

Input from Users

The DCC stated that to maintain a high level of quality, it would be advantageous to receive input from DCC Users. This is to give the DCC better foresight of firmware updates and meter installations as this data is not readily available to the DCC. Another element that would benefit from DCC User input would be understanding the actual and forecasted use of rarely used and previously unused Service Requests. In terms of identifying the use of rarely used Service Requests, or ones that have previously not been used, the Working Group commented that this may be because businesses are not currently in a position to use them. However, the DCC User should inform the DCC when it is going to initiate the use of these. This is to anticipate any increase in the use of Service Requests that are not frequently used. These include:

Previously unused Service Requests:

- Hand-Held Terminals (HHTs) and local commands
- Sequencing
- Customer Identification Numbers
- Service Opt-Out/Opt-In
- Twin rate Electricity Smart Metering Equipment (ESMEs)

Rarely used Service Requests:

- Disable/Enable supply
- Auxiliary Load Control
- Load Limiting
- Export
- Read Network Data (gas and electricity)
- Read active power import
- Voltage surveys

The Working Group was concerned with the role of the DCC User under the Proposed Solution, specifically that Users would be required to still submit information and forecasts around exceptional use (for instance if a new price cap was due to be implemented or if the User expected to perform a firmware upgrade). In the current solution, there is ambiguity around the details as to what is required of the DCC User once obligations are removed. The Working Group believed that the role of the DCC User in the Proposed Solution should be explicitly set out within a guidance document. It was suggested that it should be included within the DCC Anomaly Detection Threshold (ADT) and Forecasting Guidance document.

The Working Group suggested that the User's role should be included within the document before the modification progresses to the Refinement Consultation. This will allow for more informed consultation responses. It was also suggested to amend the legal text to include a reference to the guidance document. The legal text has since been significantly re-written. The DCC advised that the added guidance would have to be agreed by the Design Release Forum.

Working Group members sought clarity regarding what will be expected of the SEC Party, to allow them to allocate resource accordingly. If they are still required to validate the DCC forecasts and provide additional information as to any exceptional usage, they will still need to keep their forecasting resources in place and will not receive any benefits from the modification.

The DCC gave an overview of the 'Consensus Forecast' stage of the forecast process, which is where DCC User input will be required. The Working Group questioned the approach of gathering the DCC User input. The DCC suggested it would be through a focused group or via the OPSG. The Working Group advised that each type of SEC Party would need to provide feedback on expected behaviour, which could result in a large group of people providing input and that may present significant logistical issues, with regards to availability and commercial considerations.

Noting these discussions, the DCC agreed to remove the obligation on Users having to feed into the forecast process in order to maintain the required level of accuracy. Users will still be able to do this, but it is no longer an obligation.

Obligations in the SEC

The Working Group agreed that the obligation should be removed from the SEC for DCC Users to produce and submit eight-month Service Request forecasts each quarter. A Working Group member requested that an obligation should be placed in the SEC for the DCC to adhere to when producing the STLF, MTLF and LTLF. This will add transparency as to when the forecasts will be made available and where they will be discussed. It was suggested that the DCC should present the forecasts to the SEC Panel at its monthly meetings.

A Working Group member commented that removing the obligation on DCC Users results in less work for the DCC User to carry out, but that they would be happy to help to bolster forecast accuracy where needed. Another Working Group member stated that by the DCC taking the forecasting in-house, the DCC will be responsible for any inaccuracies found. This has been incorporated into the legal text as the DCC will have to provide commentary when reports to not include the desired level of accuracy.

Anomaly Detection Thresholds

The subject of ADTs was raised as the current DCC User forecasts are used to calculate a DCC User's volume of ADTs. The DCC confirmed that ADTs are currently outside the scope of this modification. During the Refinement Process, the legal text was amended to ensure that the DCC monitors any changes to a User's ADTs as this is a strong indication of an increase or decrease of Service Request volumes.

Use of SharePoint

A query was raised regarding the use of the DCC SharePoint. The Working Group member asked if the upload of the report would be done so manually or if automation could be introduced. This is due to frustrations where other reports (separate from Service Request forecasting) are not uploaded on time and in some cases uploaded incomplete. The DCC stated that the report will be uploaded manually, and they will endeavour to provide the report on the agreed day/time.

Legal text

SECAS informed the Working Group that it had engaged with the SEC Lawyer to help address previous comments raised by the Working Group. This resulted in a significant re-write of the legal text. The SEC Lawyer has proposed amending SEC Section G 'Security' to remove the reference to Service Request forecasts when setting ADTs. A Working Group member queried the impact of this proposed change. They stated that ADTs fulfil a specific purpose, and a potential risk may arise if they are not linked to predicted volumes of traffic. The Working Group commented that the impact is hard to quantify without the Proposed Solution being implemented.

Views of the OPSG

Following the Working Group's review of the Refinement Consultation and subsequent amendments to the legal text, SECAS provided an update to the OPSG. The OPSG agreed that the Proposed Solution addresses the issue defined and agreed with the implementation approach. A member requested that a timeline was drafted to show how MP116's implementation would affect the forecasts after the scheduled implementation (24 February 2022). This has now been included in this Modification Report (see Section 6 above).

Views against the General SEC Objectives

Proposer's views

The Proposer believes that MP116 better facilitates SEC Objectives (a)[1] and (b)[2]. This is due to the updated forecasting process delivering an enhanced level of accuracy of forecasted Service Request volumes. This aids the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises and allows the DCC to comply with the objectives of the DCC licence while optimising DCC System capacity.

Industry views

Respondents to the Refinement Consultation felt that the modification better facilitates SEC Objectives (a) and (b) and agreed with the Proposer's rationale.

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on safety and reliability of the smart metering systems.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the cost of energy bills.

[1] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

[2] Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will provide a positive impact on the quality of service as the Proposed Solution will allow the DCC to accurately forecast the number of Service Requests due to be sent in the short-term, medium-term, and long-term. This will enable the DCC to better control and balance the capacity, benefiting the whole industry.

Benefits for society as a whole

This modification will have a neutral impact on society.

Refinement Consultation responses

SECAS received a total of six responses (five Large Suppliers and one Network Party) to the MP116 Refinement Consultation.

The majority of respondents were generally supportive of the modification's intent, though felt that the legal text and DCC User Guidance document still needed further refinement and clarification. Four respondents felt that the solution put forward will effectively address the issue identified. SECAS has since worked with the Proposer and the SEC Lawyer to create updated versions of the documents, addressing where possible the respondents' comments and suggestions.

Respondents were satisfied with a targeted 2022 implementation, however one respondent suggested that the modification could be implemented sooner. SECAS advised that following further revisions of the legal text and DCC User Guidance document, the modification will not be voted upon until January 2021. This would mean that the soonest scheduled release would be the February 2022 SEC Release.

Respondents felt that there would be a positive impact on their organisations as there would be a time saving in not having to provide their own forecasts, however it was difficult to quantify as they will need to provide input into and validate the new forecasting process.

The majority of respondents agreed that MP116 better facilitates SEC Objectives (a) and (b), agreeing with the reasons set out within this Modification Report. A key point raised was that if MP116's implementation results in a higher level of forecast accuracy, the DCC will be able to better manage their services which will be of benefit to the consumer.

Three respondents felt that this modification should be approved, noting the costs and benefits of the Proposed Solution. Another supported the intent, but felt further work needed to be carried out.

One respondent felt that the DCC should instead be working towards maximising the required capacity as relying on forecasts is not enough. This is due to the market constantly developing and the use of current and historic data not supporting future trends. They also stated that there is no accountability in the DCC taking on board the information provided by Users. The DCC responded stating that if the current forecasting process remains in place, Users will still be required to submit forecasts that are deemed inaccurate. This would result in the DCC having to provide a service with a significant increase in capacity to facilitate inaccurate forecasts. The respondent believed that this would come at a high cost.

Appendix 1: Progression timetable

On 30 November 2021 the CSC agreed that MP116 was ready to proceed to the Report Phase. SECAS will issue the Modification Report Consultation before proceeding to Change Board vote. If approved, MP116 will be implemented as part of the February 2022 SEC Release.

Timetable	
Action	**Date**
Draft Proposal raised	18 Feb 2020
Presented to CSC initial comment	25 Feb 2020
Presented to CSC for final comment and recommendations	31 Mar 2020
Panel converts Draft Proposal to Modification Proposal	17 Apr 2020
Proposed Solution developed with the Proposer	May 2020
Modification discussed with Working Group	1 Jul 2020
Legal text developed with the Proposer	Aug 2020
Modification discussed with Working Group	2 Dec 2020
Further refinement of the Proposed Solution	Dec 2020 – Feb 2021
Modification discussed with Working Group	3 Mar 2021
Guidance document produced by the DCC	Apr 2021
Modification discussed with Working Group	5 May 2021
Refinement Consultation	13 Jul – 9 Aug 2021
Refinement Consultation responses discussed with Working Group	6 Oct 2021
Modification discussed with the OPSG	2 Nov 2021
Modification Report presented to CSC	30 Nov 2021
Modification Report Consultation	1 Dec 2021 – 7 Jan 2022
Change Board Vote	26 Jan 2022

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
ADT	Anomaly Detection Threshold
CSC	Change Sub-Committee
DCC	Data Communications Company

Glossary	
Acronym	**Full term**
ADT	Anomaly Detection Threshold
DIG	Distributor Issues Group
ESME	Electricity Smart Metering Equipment
HHT	Hand-Held Terminal
LTLF	long-term load forecasting
MTLF	medium-term load forecasting
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
STLF	short-term load forecasting
SR	Service Request
SRV	Service Reference Variant

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MP116 'Service Request Forecasting'

Annex A

Legal text – version 1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section G - Security

These changes have been redlined against Section G version 12.0.

Amend Section G6.4 as follows:

G6.4 Where a User sets any Anomaly Detection Threshold in accordance with Section G6.3, it shall:

(a) set that Anomaly Detection Threshold at a level designed to ensure that it will function, when used for the purposes of Threshold Anomaly Detection, as an effective means of detecting any Compromise to any relevant part of its User Systems;

(b) before doing so~~: (i),~~ ~~—~~take into account any guidance issued by the DCC as to the appropriate level of the Anomaly Detection Threshold; and

~~(ii) have regard in particular to the forecast number of Service Requests provided by the User to the DCC in accordance with Section H3.22 (Managing Demand for User Interface Services); and~~

(c) after doing so, notify the DCC of that Anomaly Detection Threshold.

Section H - DCC Services

These changes have been redlined against Section H version 10.0.

Amend Section H3 as follows:

Managing Demand for DCC User Interface Services

H3.21 During~~By the 15th Working Day of~~ the months of January, April, July and October, by the 15th Working Day of the month, the DCC~~each User~~ shall provide to the Panel and all Users the DCC's~~ with a~~ forecast of the number of Service Requests that all~~the~~ Users will (collectively) send in each of the 6~~8~~ months following the end of the month in which such forecast is provided. Such forecast shall contain a breakdown of the total number of Service Requests by reference to each Service Reference Variant listed in the DCC User Interface Services Schedule~~ and the category of Service (i.e. Future Dated, On Demand or Scheduled)~~; provided that for Service Reference Variant 11.1 (Update Firmware), the forecast must predict the aggregate number of Device upgrade requests that will be specified in the Service Requests (rather than the number of Service Requests). Each such forecast must specify the DCC's estimate of the number of Smart Meter installations and Enrolments which all Users will (collectively) undertake during each relevant month (recognising that such installations and Enrolments drive Service Request volumes).

H3.22 ~~A Party that is not a User but expects to submit Service Requests to the DCC at any time during any period referred to in Section H3.21 shall comply with Section H3.21 as if it were a User.~~The DCC shall produce, periodically review and update, and apply a methodology (including applicable assumptions) for creating the DCC's forecasts under Section H3.21. The DCC shall share such methodology (and updates) with the Panel and Users, and the DCC shall take into account any comments on such methodology received from the Panel and Users. In producing its forecasts under Section H3.21, the DCC shall take into account any and all information provided by Users under Section H3.25.

H3.23 The DCC shall monitor and record the aggregate number of Service Requests sent by each User in total, and also the aggregate number of Service Requests sent by each User in respect of each Service Reference Variant listed in the DCC User Interface Services Schedule. In addition, for Service Reference Variant 11.1 (Update Firmware), the DCC shall monitor and record the aggregate number of Device upgrade requests specified in Service Requests.

H3.24 During the months of February, May, August and November, b~~B~~y no later than the 10th Working Day ~~following the end~~ of ~~each~~the month, the DCC shall provide to the Panel and all Users a report which sets out:

(a) the aggregate~~each User with a report that sets out the~~ number of Service Requests sent by all~~that~~ Users (collectively) during each of th~~at~~e previous 3 months (in total and broken down by reference to each Service Reference Variant listed in the DCC User Interface Services Schedule, and by number of Device upgrade requests for Service Reference Variant 11.1 (Update Firmware)), and comparing the actual numbers sent against the numbers most recently forecast for the applicable month;

(b) the DCC's assessment as to the cause of any significant deviation (taking into account any directions of the Panel concerning significance) between the DCC's forecasts and

the actual numbers under paragraph (a) above, and the DCC's proposed corrective action; and

(~~b~~c) ~~each User with a report setting out~~ the current value (calculated at the end of each of the previous ~~3~~three months) for every Monthly Service Metric (measured across all~~for that~~ Users collectively) and a comparison of the current value against the relevant Monthly Service Threshold~~; and~~.

~~(c) a report to the Panel that sets out:~~

~~(i) the aggregate number of Service Requests sent by all Users collectively during that month (in total and broken down by reference to each Service listed in the DCC User Interface Services Schedule), and comparing the actual numbers for that month sent against the numbers most recently forecast for the applicable month;~~

~~(ii) where the total number of Service Requests sent by any User during that month is less than or equal to 90% or greater than or equal to 110% of the User's most recent monthly forecast for the applicable month, the identity of each such User and the number of Service Requests sent by each such User (in total and broken down by reference to each Service listed in the DCC User Interface Services Schedule); and~~

~~(iii) where the measured value of any Monthly Service Metric for any User and that month is greater than or equal to 110% of Monthly Service Threshold, the identity of that User and the values of such Monthly Service Metrics during that month.~~

~~H3.25 The Panel shall publish the reports provided to it pursuant to Section H3.24(c) on the Website; provided that, in respect of the report concerning under-forecasting or over-forecasting by a User as referred to in Section H3.24(c)(ii), the Panel:~~

~~(a) may decide not to publish one or more parts of that report where the Panel considers that the under-forecasting or over-forecasting was reasonable in the circumstances (including where it arose as a result of matters beyond the User's reasonable control); and~~

~~(b) shall not publish any parts of that report where there would have been no under-forecasting or over-forecasting by that User of the total number of Service Requests sent by that User during the relevant month (to be assessed on the basis of a direct comparison between actual and forecast without applying the 10% tolerance provided for in Section H3.24(c)(ii)) if the following Service Requests were excluded from the assessment:~~

~~(i) Service Request 2.2 (Top Up Device);~~

~~(ii) Service Request 7.4 (Read Supply Status); and~~

~~(iii) Service Requests published by the Panel pursuant to Section H3.26.~~

H3.25 Each User has the option (but no obligation) to review the (collective) forecasts and reports on actuals produced by the DCC under Sections H3.21 and H3.24. Each User has the option (but no obligation) to notify the DCC where the User disagrees with the DCC's forecast

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(recognising that the forecasts relate to Users collectively, and each User will only be aware of matters relating to itself), including where the User is aware of expected changes to one or more of the following (each of which will apply by reference to any threshold or other guidelines approved by the Panel from time to time):

(a) the User's daily/monthly distribution or volume of Service Requests;

(b) the User's monthly Smart Meter installation capacity;

(c) firmware releases for the User's Devices; and/or

(d) tariff updates for the User's customers.

H3.26 The Panel shall maintain and publish a list of priority Service Requests (if any) in respect of which the DCC must focus its efforts in achieving forecasting accuracy under Section H3.21~~that are subject to Section H3.25(b)(iii)~~. A Service Request shall only be added or removed from the list on the application of one or more Users or the DCC, and where the Panel considers the addition or removal to be reasonable in circumstances. The Panel shall publish the list from time to time on the Website, and shall give the DCC and each User advance notice of any changes to the list.

H3.27 The DCC shall, on or around each anniversary of the date on which it first started providing Services over the DCC User Interface, review (and report to the Panel on) each Monthly Service Metric and associated Monthly Service Threshold to establish whether they are still an appropriate mechanism to illustrate User behaviour that may utilise a significant element of the capacity requirements of the Services.

H3.28 ~~H3.28~~The DCC shall not be considered to be in breach of this Code with regard to the obligation to achieve Target Response Times if, for~~during~~ the month in question:

(a)~~,~~ the aggregate Service Requests sent by all Users exceeds 110% of the aggregate demand most recently forecast by the DCC for that month for~~by~~ all Users pursuant to Section H3.21~~2~~;

(b) the DCC can demonstrate to the Panel's reasonable satisfaction that the DCC did not receive comments or other information (including revisions to Anomaly Detection Thresholds) from Users which should reasonably have led the DCC to change its forecasts; and

(c) ~~(~~provided that the DCC shall nevertheless in such circumstances take reasonable steps to achieve the Target Response Times~~)~~.

Data Communications Company

User Guidance

Service Request Forecasts

Version: 1.3
Date: 10.01.22
Author: Graeme Liggett
Classification: DCC Public

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1. Background

1.1. Summary

Section H3 of the Smart Energy Code (SEC) covers the obligations on the DCC and Users in relation to Service Request Forecasting.

The DCC is obliged to provide Service Providers with a rolling monthly forecast of the number of Service Requests expected to be sent in the immediately following three (3) calendar months and anticipated in the subsequent three (3) calendar months. Service Providers are then obliged to provide a minimum of 110% of the capacity required to meet their performance obligations, based on these forecasts.

Building on this obligation the DCC also provides Service Providers with a 48-month Service Request forecast for load and system performance prediction.

These Service Request forecasts support Service Providers in their drive to meet the required service levels and are translated into a commitment by Service Providers to meet these predicted Service Request volumes. They also aid the prediction of future workloads, the impact on component and service capacity and underpin Service Provider Capacity Plans that set out their plan to meet the required service levels over the next 24 months as Service Request volumes grow.

This document, which will be published on SharePoint, is intended to provide Users with guidance in meeting the mandatory requirements of the SEC. Please note that the DCC has supplied this guidance based on their knowledge at the time of writing. DCC would welcome ongoing feedback on how the contents can be improved.

- Section 3 describes the expectations on Users extracted from SEC sections H3 of the Smart Energy Code (SEC)
- Section 4 sets out the Service Request Forecast output to be shared with Users
- Section 5 sets out the Service Request Variance Report output to be shared with Users
- Section 6 outlines the governance requirements for updating the Service Request Forecast User Guidance document.

1.2. Benefits

The accurate production of Service Request forecasts provides the following benefits:

#1. Solid projections for expenditure

- Enables accurate system sizing, avoids over purchasing and wasted capacity
- Enables the prioritisation of investments in new components to support planned growth.

#2. Improved utilisation of assets

- Improves confidence that capacity can be provided when needed and not overprovisioned
- Anticipates and provisions adequate capacity for critical high-demand periods
- Provides a basis to challenge requests for resources
- Identifies bottlenecks, where under-capacity keeps other resources from being used.

#3. Business agility

- Allows capacity to stay in step with demand and the agility to execute significant change
- Informs how configuration changes impact current and projected performance
- Diminishes the risk associated with changes to the service.

#4. Business confidence

- Allows future requirements to be assessed and delivered
- Inspires industry confidence and positions the DCC and Service Providers to be proactive
- Prevents service degradation and prevents potential outages.

1.3. Introduction

This Service Requests Forecasts guidance document makes provision for such matters as are described in Section H3 of the Code, and provides further processes and detail required to facilitate those matters.

The DCC will produce two Service Request Forecasts (covering the following 6 months and 48 months) and a single variance report (covering the previous three months).

1. A six-month forecast of the number of Service Requests that Users will (collectively) send in each of the six months following the end of the month in which such forecast is provided. This forecast will contain a breakdown of the total number of Service Requests by reference to each Service Reference Variant listed in SEC Appendix E 'DCC User Interface Services Schedule' and the category of Service (i.e. Future Dated, On Demand or Scheduled). Each forecast will specify the DCC's estimate of the number of Smart Meter installations and Enrolments which Users will (collectively) undertake during each relevant month (recognising that such installations and Enrolments drive Service Request volumes)

2. A 48-month forecast of the number of Service Requests that Users will (collectively) send in each of the 48 months following the end of the month in which such forecast is provided. This forecast will contain a breakdown of the total number of Service Requests by reference to each Service Reference Variant listed in SEC Appendix E 'DCC User Interface Services Schedule' and the category of Service (i.e. Future Dated, On Demand or Scheduled).

3. A Service Request Forecast accuracy report that sets out the number of Service Requests sent by Users (collectively) during each of the previous three months (in total and broken down by reference to each Service Reference Variant listed in the DCC User Interface Services and comparing the actual numbers sent against the numbers most recently forecast for the applicable month. This will evidence the accuracy of previous forecasts and identify steps to improve future forecast accuracy.

Each Forecast will predict the volume of distinct (excluding retries) Service Reference Variants, as indicated by their Service Request ID, sent over the time-period covered by the forecast.

The exception to this is SRV 11.1 for firmware distribution, where a single Service Request is sent from the User to the DCC but this SRV results in multiple Commands being sent from the DCC to Devices. The Service Request Forecast predicts the number of Device upgrade requests (or Transaction ID's) specified within the SRV 11.1 and not against the number of Service Requests sent by the User.

Requests to transform a Critical Service Request (Sent to the TRANSFORM service using a Command Variant (CV) value of 4) which will be returned to the User for correlating and signing are not counted in the forecast. However, the subsequent sending of the Signed Pre-Command for sending to the Device (including for local delivery) will be counted within the Service Request Forecast.

These definitions align the Service Request Forecast to the definitions employed within the ADT User Guidance Document. In adopting the same definitions, the Service Request Forecast can be used to benchmark the global Anomaly Detection Threshold (ADT) settings.

The Service Requests included within the Service Request Forecast will align to Appendix E, DCC User Interface Services Schedule.

2. Document Control

2.1. Revision History

Revision Number	Revision Date	Summary of Changes	Name
1.0	29/06/2021	Version used as baseline for User Guidance document	Graeme Liggett
1.1	07/07/2021	Refined text and removed SRV volumes	Graeme Liggett
1.2	16/09/2021	Updated in response to consultation comments	Graeme Liggett
1.3	10/01/2022	Updated further in response to consultation comments	Graeme Liggett

2.2. Related Documents

Document	Version	Author	Date
Smart Energy Code (SEC)	40	SECAS	24/06/2021
SEC Appendix E – DUISS	5.0	SECAS	13/03/2021

3. Service Request User Guidance

3.1. Overview

The DCC will publish a forecast of Service Requests once a quarter, covering the following six months, broken down by Service Reference Variant and document assumptions made relating to the expected pattern of Service Request demand. Annually, the DCC will publish a four-year forecast of expected traffic.

The DCC shall:

a) by the 15th working day of January, April, July and October publish a Service Request Forecast, covering the six months following the month of publication

b) by the 10th working day of February, May, August, November publish a report on the accuracy of the six-month Service Request Forecast covering the previous three months, before the month of publication

c) by the 10th working day of December, publish a 48-month Service Request Forecast, covering the 48 months following the month of publication

Each of these documents will be published on SharePoint and available to the Panel and all Users (Information for Sec Parties : Reports).

3.2. User and DCC Responsibilities

The input Users may provide into the process is documented in Section H3 of the Smart Energy Code (SEC). Users are not obliged to provide input, however this would help reduce uncertainties in future demand and improve forecast accuracy. Forecast accuracy is dependent on an understanding of Users expectations and changes in behaviour.

The DCC asks (but without obligation) that Users support the production of these Service Request Forecasts through their insight and guidance to maintain the monthly accuracy target of +/-10%. This forecast accuracy target aligns to Service Provider contracted requirements which obligates them to provide capacity equivalent to 110% of forecasted Service Requests.

The numbered paragraphs below outline the input that the DCC anticipates Users will provide to support the production of these Service Request Forecasts.

1. The DCC will produce, periodically (at least annually) review and update a methodology (including applicable assumptions) for creating the DCC's forecasts. The DCC will share this methodology (and updates) with the Panel and Users, and the DCC will take into account any Panel or User comments.

2. Where a User disagrees with the DCC's Service Request forecast, they are asked (but not obliged) to notify the DCC of their concerns, through their Service Management contact. In addition, Users are asked (but not obliged) to notify the DCC where a User is aware of expected significant changes to one or more of the following (each of which will apply by reference to thresholds or other guidelines approved by the Panel from time to time and set out in the quarterly service request forecast):

    a. the User's daily/monthly distribution or volume of Service Requests;

    b. the User's monthly Smart Meter installation capacity; and/or;

    c. firmware releases for the User's Devices.

In producing its forecasts, the DCC will take into account any and all information provided by the Panel or Users.

3. The DCC will monitor revisions made to User Anomaly Detection Threshold Files for indicators of changes in behaviour. Clarification on revisions made to User ADTs may be sought through User Service Management reviews or Users directly through Service Management contacts where these changes could impact the forecast accuracy target of +/-10%

4. The DCC will monitor User Service Request volumes for indicators of changing behaviours. Clarification through User Service Management reviews or Users directly through Service Management contacts may be sought where these changes could impact the forecast accuracy target of +/-10%

5. Users are asked (but not obliged) to share with DCC any comments they have on DCC's proposed corrective actions (which may include changes to the methodology, assumptions etc.) to correct for significant deviations between the DCC's forecasts and the actual numbers, as documented in the Service Request Forecast Variance Report. The DCC will take into account any and all information provided by Users when correcting its forecasts and record and share these comments with the Panel.

6. The Panel will maintain and publish a list of priority Service Reference Variants in respect of which the DCC must focus its efforts in achieving forecasting accuracy. These are identified as those responsible for the largest impact on DCC Services, either due to their volume or payload size. A Service Reference Variant will only be added or removed from the list on the application of the DCC, one or more Users, and where the Panel considers the addition or removal to be reasonable. The Panel will publish the list from time to time and will give the DCC and each User advance notice of any changes to the list. While the DCC focuses its efforts on forecasting these prioritised Service Reference Variants, all Service Reference Variants will be forecast.

7. Ahead of the publication of DCC's annual 48-month Service Request Forecast, the DCC will invite Users to input into the production of this long-range forecast. This should take place through a workshop and / or bilaterals, with invitations sent out four weeks prior to the workshop or bilateral. At the Panel's direction, DCC can also issue a consultation to allow all Users to review and comment, if they feel that is required. The DCC will take into account any and all information provided by Users when producing its long-range forecast upon which Service Providers will build their capacity plans, The DCC will record and share these comments with the Panel.

3.3. Priority Service Reference Variants

The DCC has identified 30 Service Reference Variants that represent approximately 92 percent of Service Reference Variant volumes in June 2021. The accuracy of these Service Reference Variants will be prioritised in DCC's modelling as they have the largest impact on forecast accuracy. Service Reference Variant 11.1 Firmware Download is added to this list due to its impact on DCC Services.

This prioritised list of Service Reference Variants will be reviewed by the Panel at least each quarter and ahead of the publication of each Service Request Forecast.

Top Service Reference Variants by Volume (1-30 SRV by Volume)

SRV	SRV Name
1.1.1	Update Import Tariff (Primary Element)
1.2.1	Update Price (Primary Element)
11.2	Read Firmware Version
11.3	Activate Firmware
12.1	Request WAN Matrix
12.2	Device Pre-notification
2.2	Top Up Device
4.1.1	Read Instantaneous Import Registers
4.1.2	Read Instantaneous Import TOU Matrices
4.11.1	Read Tariff (Primary Element)
4.14	Read Prepayment Daily Read Log
4.17	Retrieve Daily Consumption Log
4.4.2	Retrieve Change Of Mode / Tariff Triggered Billing Data Log
4.6.1	Retrieve Import Daily Read Log
4.8.1	Read Active Import Profile Data
5.1	Create Schedule
6.11	Synchronise Clock
6.13	Read Event Or Security Log
6.15.1	Update Security Credentials (KRP)
6.15.2	Update Security Credentials (Device)
6.17	Issue Security Credentials
6.21	Request Handover Of DCC Controlled Device
6.24.1	Retrieve Device Security Credentials (KRP)
6.6	Update Device Configuration (Gas Conversion)
6.8	Update Device Configuration (Billing Calendar)
8.1.1	Commission Device
8.11	Update HAN Device Log
8.2	Read Inventory
8.7.2	Join Service (Non-Critical)
8.9	Read Device Log

4. Service Request Forecast

4.1. Overview

The quarterly Service Request Forecast will present the expected monthly aggregate volume and by Service Reference Variant of distinct Service Requests (excluding retries), as indicated by their Service Request ID (or Transaction ID for SRV 11.1) for the six months following the month of publication.

The Service Request Forecast will be published on SharePoint as an Excel document. This publication will include:

- Commentary on expected Service Reference Variant Volumes
- Detail of the assumptions made in producing the forecast
- Present the predicted Service Request volumes by Service Reference Variant by month
- Present the predicted number of Devices installed and Enrolled by month
- Guidance and thresholds for Service Reference Variant volume changes that Users should bring to DCC's attention. As these thresholds are set with reference to changes in the number of priority Service Reference Variants that Users expect to (collectively) send and typically number tens of millions of a specific Service Reference Variant, Users are unlikely to exceed these thresholds. The exception being 11.1 the Firmware Download Request, where monthly volumes are volatile, with large increases or declines month-on-month.

The Service Request Forecast will be published to SharePoint (Information for Sec Parties : Reports), where the DCC already publishes reports to Users, by the 15th working day of January, April, July and October.

5. Service Request Forecast Variance Report

The quarterly Service Request Forecast Variance Report will present the monthly variance between actual and forecast aggregate Service Request volumes of distinct Service Requests (as defined in Section 1.3) for the previous three months.

This variance report will review and comment on the variance between actual and forecast aggregate service request volumes by each Service Reference Variant.

In reporting distinct Service Reference ID and Transaction ID counts of Service Requests, the volumes within this report are comparable to the method of calculation to ADT volumes and User SSI Service Request volume data. The monthly DCC Service Request Forecast Variance Report produced prior to the introduction of this modification applied a number of filters that could create a difference of between 10 and 20 percent between User Self-Service (SSI) volumes and User actual volumes as presented in the DCC User variance report.

The Service Request Forecast Variance Report will be published on SharePoint as a PDF document. This publication will include:

- Commentary on Service Reference Variant Volume variance
- Recommendation actions to improve forecast accuracy
- Variance of Service Request actual and predicted volumes by Service Reference Variant
- Variance of actual and predicted meter installations and enrolments.

The Service Request Forecast Variance Report will be published to SharePoint (Information for Sec Parties : Reports), where the DCC already publishes reports to Users, by the 10th working day of February, May, August, November.

6. Guidance Governance

Any proposed changes to this Service Request Forecast Guidance document must first adhere to the following governance requirements prior to publishing.

Where Panel, its delegated authority or a SEC Party ask for an amendment to the Guidance document, that change should be workshopped at SEC Panel or its delegated authority.

- DCC are responsible for drafting changes to the Service Request Forecast Guidance document
- The drafted changes should be presented to the SEC Panel or its delegated authority for review and approval. At the guidance of the Panel these changes can be shared with all Users for consultation
- DCC are responsible for publishing the updated Service Request Forecast guidance to SharePoint and removing superseded versions
- DCC will act as an intermediary to resolve any issues.

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MP116 'Service Request Forecasting' Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP116 Refinement Consultation.

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

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Networks Party	No	Whilst we understand the issue and the intent, we still believe that there is some work to do with the details around the solution.	SECAS will review the responses to the Refinement Consultation with the Proposer and amend the legal text and DCC User Guidance document accordingly before returning to the Working Group.
British Gas	Large Supplier	Yes	DCC have enough historical data to forecast the aggregate number of SRVs / CSRs more accurately than the collective DCC Users.	
OVO	Large Supplier	Yes	We are hopeful that the issues identified will be resolved, and the User burden of having to provide these values going away, will make this better for all. As long as the matters pertaining to the guidance and the processes described are addressed. The Mod itself needs work to be done outside of the process, set out in the guidance, to ensure this is successful.	The DCC User Guidance document will undergo review following the feedback received through this consultation. This will be issued ahead of the next Working Group.
EDF	Large Supplier	Yes	Although we do not expect to see benefits from the implementation of MP116 as we will still be required to forecast SRs for the purpose of Anomaly Detection Thresholds and will still be required to provide input into the DCC for exceptional events.	

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Question 11: Please provide any further comments you may have

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
Western Power Distribution	Networks Party	We have the following comments about points within the Modification Report: 2 – DCC Load Forecasting types – we wonder if there should be reference and consideration given to maintenance and BCDR activities. 3 – It states 'Users will sign off' however it is still unclear exactly how this will work. 3 – We would like confirmation that the reporting that will be produced will be automatically uploaded to SharePoint and not uploaded manually as this can cause issues. 3 – User Input states that the DCC will ask User to notify them, however the legal text makes this an obligation, rather than a request. It also states a select number of Parties will be requested by the DCC to provide input. We are concerned that this is not appropriate and might not be accurate to represent all of industry. In comparison it then states that Network Operators may be requested to input. We also don't think that this is the same as what is represented within the legal text. 7 – Input from Users states that the guidance document has to be agreed by the Design Release Forum, and we would like to know how and why? If this is the case does the guidance document governance section need to allow for this. What happens if industry agree but the	SECAS will address your comments with the Proposer and will update the Modification Report to include the detail that you have requested.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
		Design Release Forum have a different view and want to make changes when they haven't been involved in the discussions. 7 – Use of SharePoint – we would rather that the reporting that will be produced will be automatically uploaded to SharePoint and not uploaded manually as this can cause issues.	
British Gas	Large Supplier	No comment.	
OVO	Large Supplier	Not at this time. All comments are within the answers provided.	
EDF	Large Supplier	No comment.	
Utilita Energy Limited	Large Supplier	No comment.	
E.ON Energy	Large Supplier	Based on the guidelines set out for the modification proposal – MP116 'Service Request Forecasting' we are happy to accept the terms but we would welcome clarification on the following points: • The 48 month forecast being produced seems like an unrealistic time period based to forecast on the speed of change. Why is this needed? • What is the feedback process based on the calculation of each Service request variant if we disagree with what has been calculated? • Are there any penalties associated with not responding and ultimately going over forecast?	SECAS will look to clarify your comments with the Proposer.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
		• Two Service Request Forecasts covering both SMETS1 and SMETS2 are produced but a single Service Request Variance Report (Report) is produced (1.3 and 5). The Report comments on actual and forecast aggregate service request volumes. This will not be sufficient (as not split by SMETS1 and SMETS2) to identify the potential cause of any variance to enable feedback. • What date will these changes take effect and how far back will they be looking at historic data? (as may skew the forecast) • Any considerations regarding suppliers who are a part of the supplier of last resort process and how this could affect the forecasting that is outside of commercial activities. • Is there a review point to assess how this new process is working? - say after 6 months, 12 months (lessons learned etc).	