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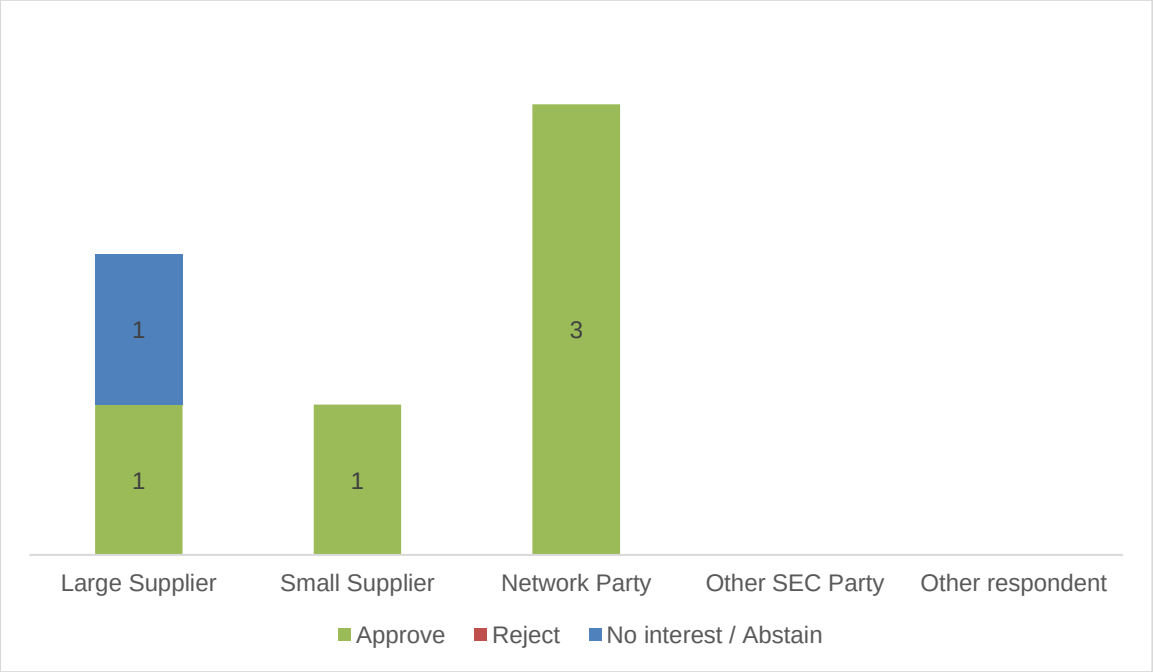
MP116 'Service Request Forecasting' Modification Report Consultation responses

About this document

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

Summary of responses



Question 1: Do you believe that MP116 should be approved?

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Approve	We believe that this SEC Modification would better facilitate SEC Objectives (a) and (b) for the reasons detailed in the Modification Report.	
E.ON Energy Solutions Limited	Large Supplier	Approve	Facilitates SEC objectives (a) and (b).	
Drax Group	Small Supplier	Approve	As the DCC has identified that the accuracy of forecasts provided by Users does not meet the level required to produce useful data, we support the implementation of MP116, which will remove the obligation on Suppliers to expend resource on this activity. If the DCC has enough historical data to forecast more accurately, and identify trends, than collective DCC Users, then this is a sensible approach. The proposal makes provision for Users to provide input into forecasting, so the opportunity to notify of extraordinary events, which could impact demand for DCC User Interface Services, remains.	
Electricity North West Limited	Network Party	Approve	The modification better facilitates SEC Objectives (a) and (b) and we agreed with the Proposer's rationale.	
BUUK	Network Party	Approve	We agree with the proposal that the DCC carrying out User Service Request forecasting using historical usage	

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			data should produce more accurate forecasting than that of User estimates. We also agree that User input for the proposed DCC forecasting should be provided on a voluntary basis, to prevent the issues this modification is seeking to address as outlined in the report. As such, we agree with the Proposer that MP116 better facilitates SEC Objectives: (a) 'Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain'. (b) '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'.	
Utilita Energy Limited	Large Supplier	Abstain	No comment.	

Question 2: Please provide any further comments you may have

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
Western Power Distribution	Network Party	With regards to the DCC User Guidance, Section 3.2, point 2 doesn't make sense. We suggest the following: 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.	Thank you for your comments. SECAS will update the document and send it to the Proposer for review.

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
		With regards to the DCC User Guidance, Section 3.3, we question whether the table should include an 'as at date' for ease of reference, although we appreciate that the document has a revision table. Presumably this table (and therefore document) will potentially be updated every quarter.	
E.ON Energy Solutions Limited	Large Supplier	No further comment.	
Drax Group	Small Supplier	It's challenging for Suppliers to accurately forecast the number of Service Requests as far ahead as 8 months. The implementation of Faster Switching in 2022 has the potential to increase spontaneous switching, so could further limit Suppliers' ability to predict traffic. We fully support the DCC's proposal to remove a superfluous reporting obligation enabling Suppliers to better utilise the resource involved.	
Electricity North West Limited	Network Party	No further comment.	
BUUK	Network Party	We believe the proposed approach is sensible & could be considered as a more efficient approach for other DCC User forecasting requirements also.	
Utilita Energy Limited	Large Supplier	Utilita acknowledge that the DCC have greater insight into Service Request traffic and behaviour over the DCC network. However, we still believe that the DCC will encounter the same issues Users have experienced in attempting to accurately forecast volumes. We expect that, due to the forecasts being issued as a collective, it will	Thank you for your comments. SECAS will relay these back to the Proposer, and will also inform the Change Board of your views.

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
		become increasingly difficult for Users to determine whether the aggregated forecast is accurately representative of individual Users predicted volumes. Due to this, the DCC will likely receive less input into forecast predictions, and consequently encounter the same accuracy issues that have been experienced by Users. Utilita still have concerns on the dependency of forecasts when considering the inability to predict unforeseen circumstances, e.g., extreme weather conditions, which could see Users significantly deviate from their forecasts. The DCC should be moving towards maximising capacity and removing dependency of forecasts to predict required capacity. This would ensure that unforeseen circumstances would not result in any consumer detriment, such as an inability to top up, due to basing capacity requirements from incorrect forecasts. Regardless of how forecasting is performed, by Users or by the DCC, the current contractual requirements for Service Providers to provide 110% of the forecasted capacity has potential to cause issues. The DCC must mitigate this risk by ensuring capacity is always available for Users to utilise when it is required, particularly when an increase in unforeseen traffic relates to consumers supply status. A system which is procured to provide slightly above the required level of capacity stifles innovation.	