SEC
Smart Energy Code

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Smart Energy Code

MP141

‘SRV Visibility for Devices on SSI’

Modification Report

Version 1.0

22 December 2021

Corporate member of Plain English Campaign
Committed to clearer communication
592

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 four annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex C** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex D** contains the full responses received to the Refinement Consultation.

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1. Summary

This Modification Proposal has been raised by Clive Hallam from the DCC.

Supplier Parties are currently unable to view Service Request Variants (SRVs) or Service Responses which originate from other Service Users that they receive relating to Devices for which they are the Responsible Supplier. This is due to an obligation in the Smart Energy Code (SEC) that states only an individual User can view the SRVs and Service Responses they send or receive. This therefore leads to SRVs and Service Responses being received by Users without visibility or information of the triggering requests, which is causing issues where the responses may be high priority or have security implications.

The Proposed Solution is to allow Supplier Parties and Network Operators to view all the titles of all SRVs and Service Responses that have been associated with a Device for which they are the Responsible Supplier or Relevant Network Party. This will allow the User to action the affected SRVs or Service Responses and aid them in investigating the erratic behaviour of the affected Devices.

This modification will affect Suppliers, Network Parties, and the DCC. The total cost to implement the change is £199,839, with a further application support cost (early life support) of £8,346 for a period of two months after the solution is implemented. If approved this modification will be implemented in the November 2022 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

Supplier Parties receive SRVs and Service Responses for Devices they own (for which they are the Responsible Supplier). However, Supplier Parties are currently unable to view any information around the SRVs or Service Responses submitted by other Service Users on their Devices, even though they may receive Alerts in response to those requests. The other Users in question may be sending SRVs or Service Responses concerning firmware updates or trying to connect Devices on the network the Device is part of.

What is the issue?

A Supplier stated in the Technical Specification Issue Resolution Subgroup (TSIRS) forum that it would be desirable to be able to view all the SRVs and Service Responses that are sent to a meter for which they are the Responsible Supplier. Supplier Parties will receive Alerts based on SRVs sent by other Service Users to their meters. Currently, they have no visibility of this activity through the Service Audit Trail (SAT) data they have access to. They need to know which SRVs have been sent by a Service User (such as the Relevant Network Party) to the meters so that they can make an informed decision of whether to ignore or action the Alerts they receive.

SEC Section H8 'DCC Services' details the requirements which the Self-Service Interface (SSI) follows, which will need to be amended. This is found in Sections H8.15-H8.18, where H8.16(b) states the SSI must (as a minimum) allow:

> "*a record of the Service Requests and Signed Pre-Commands sent by each User, and of the Acknowledgments, Pre-Commands, Service Responses and Alerts received by that User (during a period of no less than three months prior to any date on which that record is accessed), which shall be available only to that User*".

Therefore, a change is required to alter the SSI and to provide the SAT information for all SRVs and Service Responses to or from any meter for which a User is the Responsible Supplier or Relevant Network Operator.

What is the impact this is having?

The current lack of visibility and information for SRVs and Service Responses means Supplier Parties are receiving security related Alerts with no accompanying information or rationale.

Impact on consumers

Currently Suppliers and Distribution Network Parties receive Alerts that are may have been triggered by Parties other than themselves. This means they are unaware of any issues that are being investigated that may be affecting their customer.

3. Solution

Proposed Solution

The Proposed Solution is to allow Supplier Parties and Network Operators to view all the titles of SRVs and Service Responses that have been associated with a Device for which they are the Relevant Supplier or is on their Network. By allowing this functionality, it will allow a Network Operator or a Responsible Supplier of a Device to check the Device for any SRVs or Service Responses that need to be actioned or will assist for the purpose of auditing.

The Proposed Solution will ensure that only the SAT data is used for viewing any SRVs or Service Responses. This is so that any confidential data (such as the identity of the sender or the contents of the request or response) will remain undisclosed during any such audits or during a business process of checking for SRVs or Services Responses that need to be actioned from when the Device was owned by a previous Supplier prior to Change of Supplier (CoS). It will also allow the User to investigate any erratic behaviour from Devices that are showing more activity than usual. From there, a User will be able to diagnose the issue with the affected Device and remediate the issue faster than they would without this information.

The full set of business requirements used for this solution can be found in Annex A and the proposed redlined changes to deliver the solution can be found in Annex C. The Proposed Solution is option 2 within the business requirements.

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

All Supplier Parties and all Network Parties will be positively impacted by the Modification Proposal. The Proposed Solution will allow the User to access the full list of SRVs and Service Responses a Device has either sent or received. By allowing Users to have access to the titles of each SRV or Service Request, it will provide more information to help the User in investigating erratic Device behaviour and remedy any issues with the Device.

Respondents to the Refinement Consultation confirmed there are no SEC Party changes expected.

DCC System

The DCC Systems change are limited only to Self Service Interface (SSI) changes. The DCC will modify the SSI to allow the Responsible Supplier and Relevant Network Party to view the titles of SRVs and Service Responses associated with a Device they are responsible for.

The full impacts on DCC Systems and the DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex B.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex C.

Technical specification versions

There are no changes to any of the Technical Specifications.

Consumers

This change will benefit consumers as there will be improved query resolution and dispute management processes. It will also reduce site visits and delays in dealing with issues and problems.

Other industry Codes

No other industry Codes are impacted by this proposal.

Greenhouse gas emissions

This proposal will have no effects on greenhouse gas emissions

5. Costs

DCC costs

The total cost to the DCC to implement is the Proposed Solution £199,839. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	**Cost**
Design, Build and Pre-Integration Testing (PIT)	£124,301
System integration testing (SIT) and User Integration Testing (UIT)	£68,967
Implement to Live	£6,571

There is an Application Support cost which has been calculated for a period of two months after the solution has been implemented and are referred to as Early Life Support.

Breakdown of Application Support cost	
Activity	**Cost**
Early Life Support	£8,346

More information can be found in the DCC Impact Assessment response in Annex B.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. 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

SEC Parties were asked to provide this as part of the Refinement Consultation. All respondents confirmed that they did not expect any costs to be incurred as a result of this change.

The full response to the Refinement Consultation can be found in Annex D.

6. Implementation approach

Agreed implementation approach

The Change Sub-Committee (CSC) agreed an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 3 February 2022; or
- **29 June 2023** (June 2023 SEC Release) if a decision to approve is received after 3 February 2022 but on or before 29 September 2023.

The earliest SEC Release this modification could be implemented in is the November 2022 SEC Release.

7. Assessment of the proposal

Observations on the issue

The views of the Panel Sub-Committees were sought during the Development Stage. The Change Sub Committee (CSC) agreed this is an issue. One CSC member stated that they wanted to see the scope extended in the Refinement Process so that it would consider the views of Network Parties and Other SEC Parties, not just Supplier Parties as originally outlined. SECAS agreed this would form part of the discussions in the Refinement Process if converted to a Modification Proposal.

The other Panel Sub Committees had the following views to give on the Draft Proposal:

Views of the TABASC

The Technical Architecture and Business Architecture Sub Committee (TABASC) agreed that it would like to be kept updated on the progress of this Proposal. The rationale was that Service Requests and Responses, due to CoS events, could be withheld from current Users. Additionally, a member stated that questions over a User's ability to look at Service Requests and Responses from competitors and this would need investigating.

Views of the Operations Group

The Operations Group confirmed its interest in the Draft Proposal. One member stated that any solution created must not allow the payload of these Service Requests or Responses to be viewed as it may constitute a breach of security and the General Data Protection Regulation (GDPR). Another member questioned the effectiveness of any solution which wouldn't allow a User to view the payload of the Service Request or Response. SECAS confirmed after consulting with the Security Sub Committee (SSC) about what data was being used (specifically, the SAT data to access the titles of SRVs and Service Responses rather than data payload), the Proposed Solution would not cause

security breaches or contravene the GDPR. SECAS believed that the Proposed Solution would have utility even if it can't access a SRV or Service Response payload, citing Working Group responses where members believe that just the SAT data would be beneficial for investigations.

Solution development

When asked about how they would benefit from the Proposed Solution, the Working Group members believe there is more of a use case for the Proposed Solution in investigating erratic behaviour from Devices they are responsible for, rather than actioning previous SRVs or Service Responses on Devices acquired through CoS. The Working Group stated that there would be additional benefits that would be realised if the Proposed Solution was implemented, such as investigations being completed, and decisions made at a faster rate than current.

The Working Group was asked about whether the Proposed Solution should only consist of Requirement 1 in the business requirements to reduce costs (i.e. not extended to Network Parties). Some members believed that there wasn't a clear case for Network Parties also having this access. The Working Group members rejected this. Members believed that if Requirement 2 would add little cost, this should be included it if it provides a benefit to the Network Parties. The DCC's Impact Assessment noted there would be an incremental cost of around £41,000 to include Requirement 2 (Option B) compared to delivering just Requirement 1 (Option A).

In the Refinement Process SECAS asked the Working Group if there was a preferred solution option to progress the modification forward with. The Working Group members confirmed they wished to progress with is the option to allow the Responsible Supplier and the Relevant Network Operator to see all SRVs and Service Responses sent by all Users to a Device. On nomenclature, the Woking Group suggested and agreed 'Responsible Supplier' and 'Relevant Network Party' should be used for clarity instead of 'owner', and this has been reflected as a footnote into the business requirements. The DCC confirmed this would not impact the solution.

SECAS presented the outcomes of the Impact Assessment, including reported costs for both Options A and B. SECAS highlighted the Working Group had opted to progress Option B. The TABASC remarked that costs were higher than initially expected but the benefits of implementing it made sense given the extra changes required to provide network operators visibility were good value for money and could be met in the same lead time. The TABASC requested that that this change would also need to be reflected via an update to the Business Architecture Document (BAD). Overall, the TABASC supported the modification progressing under Option B. The CSC agreed the modification should be progressed to the Report Phase.

Support for Change

The Working Group was supportive of this change as the ability to view this information would assist Parties in resolving consumers' issues.

Five out of six Refinement Consultation respondents were supportive, again believing that understanding the reason a message was initiated would assist in consumer issue resolution.

Business case

This change will benefit Suppliers and Network Operators as it will allow them to view SRVs and Service Responses early to resolve issues. This will improve query and resolution management process and reduce site visits and improve customer service in dealing with issues and problems.

Views against the General SEC Objectives

Proposer's views

The Proposer believes the Modification Proposal better facilitates General SEC Objective (a)[1], where it would contribute to the better operation of Devices at a premise that are experiencing unusual activity and require investigating. The Proposer also believes that it will provide additional benefits in the form of faster decision making for Users, which in turn provides greater efficiency and may pass through on to consumers.

Industry views

The Refinement Consultation responses were generally positive, with five out of six respondents (two Large Suppliers and three Network Operators) believing this information would help with effective management of consumers issues. Only one respondent (a Large Supplier) was not supportive. They believed that this change was a 'nice to have' feature but found it difficult to see any value for resolution of consumer issues. They did not believe that DNOs having sight of this information would resolve any issues.

Views against the consumer areas

Improved safety and reliability

Consumers may experience improved reliability as any issues they are experiencing which trigger an Alert may be more easily visible to the SEC Party that can resolve the issue.

Lower bills than would otherwise be the case

This modification is neutral against this area.

Reduced environmental damage

This modification is neutral against this area.

Improved quality of service

Consumers may experience improved quality of service as any issues they are experiencing which trigger an Alert may be more easily visible to the SEC Party that can resolve the issue.

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

Benefits for society as a whole

Where a consumer is experiencing an issue which prompts a SEC Party to issue a Service Request to investigate the problem, any Alerts or Responses received by another Party should be more easily interpreted to allow the speedy resolution of the consumer's issue.

Appendix 1: Progression timetable

Following the Modification Report Consultation (MRC) the modification will be presented to the Change Board for vote under Self-Governance on 26 Jan 2022.

Timetable	
Event/Action	**Date**
Draft Proposal raised	20 Aug 2020
Presented to Change Sub-Committee (CSC) for initial comment	25 Aug 2020
Proposal discussed with Sub-Committees	1 Sep 2020 – 9 Sep 2020
Presented to CSC for final comment and recommendation	29 Sep 2020
Presented to Panel for conversion to Modification Proposal	16 Oct 2020
Business Requirements developed with the Proposer	19 Oct 2020 – 23 Oct 2020
Business Requirements discussed at Working Group	4 Nov 2020
Modification discussed with TABASC	5 Nov 2020
Modification discussed with TABASC	7 Jan 2021
Modification discussed at Requirements Workshop	25 Jan 2021
Modification discussed with TABASC	4 Mar 2021
Preliminary Assessment requested	5 Mar 2021
Preliminary Assessment returned	9 Apr 2021
Modification discussed at Working Group	5 May 2021
Refinement Consultation	17 May 2021 – 7 Jun 2021
Impact Assessment requested	24 Jun 2021
Impact Assessment returned	19 Aug 2021
Modification Report presented to CSC	21 Dec 2021
Modification Report Consultation	22 Dec 2021 – 17 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**
CSC	Change Sub Committee
CoS	Change of Supplier
BAD	Business Architecture Document
DCC	Data Communications Company
GDPR	General Data Protection Regulation
HAN	Home Area Network
SAT	Service Audit Trail
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SRV	Service Request Variant
SSC	Security Sub Committee
SSI	Self Service Interface
TABASC	Technical Architecture and Business Architecture Sub Committee
TSIRS	Technical Specification Issue Resolution Subgroup

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MP141 'SRV Visibility for Devices on SSI'

Annex A

Business requirements – version 1.0

About this document

This document contains the business requirements that support the solution(s) for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The Data Communications Company (DCC) will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	**Requirement**
1	Allow Responsible Supplier to see all metadata of SRVs and Service Responses sent by all Users to a Device they are responsible for via the SSI.
2	Allow Network Operator to see all metadata of SRVs and Service Responses sent by all Users to a Device they are responsible for via the SSI.

This document contains requirements for multiple solution options, and an assessment for each option is to be provided. The table below summarises the requirements that make up each solution option:

Solution Options		
Option	**Req. 1**	**Req. 2**
Option 1	✓	
Option 2	✓	✓

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

The solution will use Service Audit Trail (SAT) data available via the Self Service Interface (SSI) to view additional Service Request Variants (SRVs) and Service Responses. This is so that a Current Supplier or Current Network Operator won't be able to access anything considered as confidential by a competitor within the SRV or Service Response payload.

Where a Device is mentioned in the following requirements, this specifically applies to all Devices that are connected to the Home Area Network (HAN). This means that a solution will allow a User to access all SRVs and Service Responses sent to a Device they own[1] connected to the HAN.

This solution will be applied to Smart Metering Equipment Technical Specifications (SMETS)1 and SMETS2 Devices.

2.2 Requirement 1: Allow Responsible Supplier to see all metadata of SRVs and Service Responses sent by all Users to a Device they own via the SSI.

This requirement will require the DCC to create a solution which will allow the Responsible Supplier of a Device they are responsible for to be able to view all SRVs and Service Responses sent to said Device by all Users. This will allow the Responsible Supplier to view all metadata of SRVs and Service Responses on any Device they are responsible for via the SSI, so that they can make an informed decision on whether to action them. Any data being used by the Responsible Supplier will consist only of the SAT metadata to provide the needed information.

Where 'all Users' is mentioned above, this applies to the following User roles:

- Other User
- Another Supplier Party
- Registered Supplier Agent (RSA)
- Network Operator; and
- Any future User role added after approval of the Modification Proposal.

2.3 Requirement 2: Allow Network Operator to see all metadata of SRVs and Service Responses sent by all Users to a Device they own via the SSI.

This requirement will require the DCC to create a solution which will allow the Network Operator of a Device they hold a certificate on to be able to view all SRVs and Service Responses sent to said Device by all Users. This will allow the Network Operator to view all the metadata of SRVs and Service Responses on any Device they hold a certificate on via the SSI, so that they can make an informed decision on whether to action them.

[1] The Working Group suggested and agreed 'Responsible Supplier' and 'Relevant Network Party' should be used for clarity instead of 'owner'. This clarification will not impact the solution.

Where ‘all Users’ is mentioned above, this applies to the following User roles:

- Other User
- Import Supplier
- Export Supplier
- RSA
- Another Network Operator; and
- Any future User role added after approval of the Modification Proposal.

3. Solution options

This section outlines the solution options for this Modification Proposal. It provides detailed information on the two variants of the proposed solution for the business requirements contained in Section 1 of this document.

3.1 Option 1

Solution Option 1 will consist of Business Requirement 1.

The Solution has been designed to meet the original scope of the Modification Proposal where only Responsible Supplier Parties will be affected by the proposed changes. This will result in the Responsible Supplier Parties being able to view SRVs and Service Responses sent from a variety of other sources to Devices they are responsible for. Due to only the SAT information being used to provide this information, this should prevent confidential information being accessed by the Responsible Supplier Parties.

3.2 Option 2

Solution Option 2 will consist of Business Requirements 1 and 2.

The Solution has been designed to accommodate the request of Network Operators during the Modification Proposal's Development stage, where the scope has been extended so that both Responsible Supplier Parties and Network Operators will be affected by the proposed changes. This will result in the Responsible Supplier Parties and Network Operators being able to view SRVs and Service Responses sent from a variety of other sources to Devices they are responsible for. Due to only the SAT information being used to provide this information, this should prevent confidential information being accessed by the Responsible Supplier Parties and Network Operators.

4. Glossary

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

Glossary	
Acronym	**Full term**
DCC	Data Communications Company
HAN	Home Area Network
RSA	Registered Supplier Agent
SAT	Service Audit Trail
SMETS	Smart Metering Equipment Technical Specifications
SRV	Service Request Variant
SSI	Self Service Interface

Data Communications Company

SEC Modification Proposal, SECMP0141, DCC CR4242

SRV Visibility for Devices on SSI

Full Impact Assessment (FIA)

Version:	**0.2**
Date:	**30th September, 2021**
Author:	**DCC**
Classification:	**Public**

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1 Executive Summary

The Change Board are asked to approve one of the following options for implementation:

Option A, Allow a Responsible Supplier to see all SRVs and Service Responses sent by all Users to a Device they own

- Total cost to implement SECMP0141 of £158,831, which comprises:
    - £105,981 in Design, Build and PIT costs
    - £52,850 in release costs (SIT, UIT and TTO)
- A timescale to complete the implementation of 10 months
- Include SECMP0141 in the November 2022 SEC Release

Option B, Allow a Responsible Supplier and Network Operator to see all SRVs and Service Responses sent by all Users to a Device they own

- Total cost to implement SECMP0141 of £199,839, which comprises:
    - £124,301 in Design, Build and PIT costs
    - £75,538 in release costs (SIT, UIT and TTO)
- A timescale to complete the implementation of 10 months
- Include SECMP0141 in the November 2022 SEC Release

Problem Statement

SECMP0141 proposes changes to the Self Service Interface (SSI) to allow Supplier Parties and the Network Operators to view the titles of the Service Request Variants (SRV) sent to the Devices they own, and the corresponding Service Responses from the Device.

Supplier Parties are currently unable to view SRVs or Service Responses from other Service Users that they receive on their Devices. This is due to an obligation in the Smart Energy Code (SEC) that states only an individual User can view the SRVs and Service Responses they send or receive. This leads to SRVs and Service Responses being received by Supplier Parties without visibility or information of the triggering requests.

Benefit Summary

The main beneficiaries of the change will be Supplier and Network Operator parties who will have visibility or information of the triggering requests associated with SRVs and Service Responses sent by all Users to a device they own. This will address current issues where other User's activity may be high priority or have security implications.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
28/09/2021	0.1	Initial compilation
30/09/2021	0.2	Updated following internal review

2.2 Associated Documents

This document is associated with the following documents:

#	Title and Originator's Reference	Source	Issue Date
1	MP141 Modification Report	SECAS	11/01/2021
2	SECMP0141 CR4242 - PIA - SRV Visibility for Devices on SSI v0.2	DCC	08/04/2021

2.3 Document Information

The Proposer for this Modification is Clive Hallam of DCC. The original proposal was submitted on 24th August 2020.

The Preliminary Impact Assessment was requested of DCC on 19th March, 2021. It was completed on 8th April, 2021. A Full Impact Assessment was requested on 1st July, 2021.

3 Solution Requirements and Overview

In this section, the context of the Modification, assumptions, and the requirements are stated.

The problem statement and requirements have been provided by SECAS and the Proposer.

3.1 Problem Statement

Supplier Parties are currently unable to view Service Request Variants (SRVs) or Service Responses from other Service Users that they receive on their Devices. This is due to an obligation in the Smart Energy Code (SEC) that states only an individual User can view the SRVs and Service Responses they send or receive. This therefore leads to SRVs and Service Responses being received by Supplier Parties without visibility or information of the triggering requests, which is causing issues where they may be high priority or have security implications. A change is required to alter the SSI and to provide the Service Audit Trail (SAT) information for all SRVs and Service Responses to, or from, any meter a User owns.

3.2 Business Context and Requirements

This section contains the considerations and assumptions for each business requirement.

Req.	Requirement
1	Allow Responsible Supplier to see all SRVs and Service Responses sent by all Users to a Device they own via the SSI.
2	Allow Network Operator to see all SRVs and Service Responses sent by all Users to a Device they own via the SSI.

Table 1: Business Requirements for SECMP0141, CR4242

Note that the Working Group requested two solution options, Option A covering requirement 1, with Option B covering requirements 1 and 2.

3.2.1 Requirement 1: Allow Responsible Supplier to see all SRVs and Service Responses sent by all Users to a Device they own via the SSI

This requirement needs a solution which will allow the Responsible Supplier of a Device they own to be able to view all SRVs and Service Responses sent to said Device by all Users. This will allow the Responsible Supplier to view all SRVs and Service Responses on any Device they own via the SSI, so that they can make an informed decision on whether to action them.

The 'all Users' in the requirement title applies to the following User roles:

- Other User
- Another Supplier Party
- Registered Supplier Agent (RSA)
- Network Operator
- Any future User role added after approval of the Modification Proposal

3.2.2 Requirement 2: Allow Network Operator to see all SRVs and Service Responses sent by all Users to a Device they own via the SSI

This requirement needs a solution which will allow the Network Operator of a Device they hold a certificate on to be able to view all SRVs and Service Responses sent to said Device by all Users. This will allow the Network Operator to view all SRVs and Service Responses on any Device they hold a certificate on via the SSI, so that they can make an informed decision on whether to action them.

The 'all Users' in the requirement title applies to the following User roles:

- Other User
- Supplier Party
- Registered Supply Agent (RSA)
- Another Network Operator
- Any future User role added after approval of the Modification Proposal

3.3 Scope

In this Modification, the term *Device* specifically applies to all Devices that are connected to the Home Area Network (HAN).

Based on discussions at the Working Group, DCC assumes that Device Alerts are not in scope of this change and, thus, Supplier Parties and Network Operators will remain unable to see Device Alerts sent to other Service Users. Other Suppliers or Network Operators should not be able to access data considered as confidential by a competitor within the SRV or Service Response payload. There should be no option to view the payload (contents) of the Service Requests, but any Service Responses related to the Service Requests will be visible.

This solution will be applicable to both SMETS1 and SMETS2 Devices.

4 Solution Overview

Changes to the DSP are required for this Modification solution.

4.1 Overview

DCC will modify the Self Service Interface (SSI) in order to allow the Supplier Parties and the Network Operators to view the titles of the Service Requests sent to the Devices they own, and the corresponding Service Responses from the Device, as described in the SECMP0141 requirements.

The information presented to the Service Users is based on the details of the transactions recorded within the SAT logs. No changes are expected to the SAT logs in terms of format or content. The access control rules of the Service Audit Trail screen will be revised to allow both Supplier Parties and the Network Operators to see all the Service Requests and Service Responses associated with the Devices they own.

Device Alerts are assumed to be out of scope of this change and, thus, Supplier Parties and Network Operators will remain unable to see Device Alerts sent to other Service Users.

For the Service User roles other than Supplier Party and Network Operator, the existing functionality will remain unchanged.

The Service Requests and Service Responses sent by other Service Users will be available only via the SSI Service Audit Trail screen. The revised access control rules implemented under this Modification will not be applicable to the reports generated based on the Service Audit Trail data.

DCC notes that the technical changes required for solution options 1 and 2 follow the same approach and, therefore, are not separated in terms of affected components and required support within this Impact Assessment.

4.2 SSI Changes

SSI will be modified to allow Supplier Parties and Network Operators to view the titles of Service Requests and Service Responses that have been associated with the Devices they own.

4.3 Security Impact

The DSP Security Assurance team has reviewed this change. There is no material impact on the DSP security implementation. The Security Assurance team will provide general security oversight of the implementation throughout, in accordance with DSP's contractual requirements:

- Review test artefacts and outcomes where there is a potential security consideration;
- Attend meetings where required by the implementation teams.
- Liaise with DCC as necessary on any security related concerns.

No additional Penetration Testing will take place as a result of this change on the basis that:

- there are no material changes to DSP interfaces;
- there are no material changes to the security implementation;
- there is no new infrastructure being introduced.

As a result of the above, there is no requirement to update the Protective Monitoring implementation.

4.4 Data Management

Data Management will be modified to provide the access control information required by SSI to decide the level of information presented to a Service User.

4.5 Technical Specifications and Documentation

There are no changes to any of the Technical Specifications.

Updates to the SEC will be required to allow the sharing of data specific to this Modification to the required parties.

SSI support materials will be updated to reflect these changes.

4.6 Infrastructure Components

There is no impact to infrastructure as part of this Modification.

4.7 Integration Impact

The SIT team will conduct testing to verify that for all devices which are owned by the Supplier Parties and Network Operators that they will have the ability to view both the Service Requests sent to the devices and the responses from the devices that may be have been sent by other User Roles.

A new test scenario and test script will be created for SMETS1 and SMETS2 to view the titles of the Service Requests sent to the devices that Suppliers and Network Operators own, and the corresponding Service Responses.

A defined number of SRVs will be selected and multiple User Roles will execute those SRVs to enable validation of the functional change as part of SIT testing.

4.8 Application Support

There is no impact to infrastructure as part of this Modification.

4.9 Service Impact

The introduction of this new Service User facing functionality has some potential to result in user queries that are passed through to the DSP Applications Management Support team. It is thought that this may result in less than ten additional calls per month. A more detailed service impact will be completed as part of the CR4242 Full Impact Assessment.

No changes to SLAs or reporting are expected as a result of this change.

5 Testing Considerations

This Full Impact Assessment includes the cost to develop, fully test and deliver this SEC Modification.

5.1 Pre-Integration Testing

The DSP PIT team will design and implement the functional updates required to the DSP for the change.

System Testing will be carried out to prove that the functionality specified in the Design has been implemented against agreed acceptance criteria. Both manual and automated testing is in scope. The DSP PIT System Test team create manual tests (and data). Test execution covers manual testing and automated regression test packs.

Once PIT Complete status is achieved, the PIT team will support post PIT activities in the form of technical support and defect fixes to allow DSP to achieve its test exit obligations.

The updates to the DSP system and the timing of the PIT exit will be agreed with the DCC through updates, submission and review of the Solution Design documents.

5.2 System Integration Testing (SIT)

The expected integration activities are documented below. All testing is expected to be carried out as part of November 2022 SEC Release testing on the DSP “B Stream” environments, in accordance with existing practices for SEC releases.

The DSP System Integration Testing (SIT) team will prepare and execute tests that demonstrate the two requirements, according to either Option 1 or Option 2, noted in the change request. The nature of the SIT activities required is such that Option 2 will represent only a small additional increment on what is required for Option 1. The scope of SIT for the options comprises:

- **Option 1:**
  - Submissions of SRVs by all User Roles to a SMETS1 and a SMETS2 device set, including SRVs submitted by a previous Supplier (Electric and Gas);
  - Suppliers using the SSI function to verify that they can see all of the SRVs, as permitted by this change;
  - Pre-requisite tests to provision one SMETS1 device set and one SMETS2 device set, including the required Change of supplier;
- **Option 2:**
  - All activities, a per Option 1 above;
  - Network Operators using the SSI function to verify that they can see all the SRVs as permitted by this change.

The list of SRVs submitted to each device set will be agreed via the Heatmap that will be delivered as part of the November 2022 SEC Release.

System Regression testing and SIT Management/Governance activities are not included within the response to this CR4242 as they are expected to be covered by a November 2022 SEC Release CR.

5.3 User Integration Testing (UIT)

The DSP UIT Projects team will execute Pre-UTS testing post the successful deployment of CR4242 into the UIT test environments. The testing will comprise the running of a small number of

Service Requests to a SMETS1 meter set as the Electricity Supplier to ensure that the devices are visible in SSI to the associated Electricity Network Operator.

The above testing for SMETS1 will be repeated to cover a SMETS2 meter set.

6 Implementation Timescales and Releases

This Modification is expected to be included in a SEC Release in November 2022. Implementation timescales will be finalised as part of the relevant SEC Release Change Request.

6.1 Change Lead Times and Timelines

From the date of approval (in accordance with Section D9 of the SEC), to implement the changes proposed DCC requires a lead time of approximately **ten months**.

The broad breakdown of the testing regime is shown in the following table in months after an approval decision date (D).

Phase	Duration
SECAS agreement on scope of release	
CAN signature	D + 1 Month
Design, Build and PIT Phase	3 Months
SIT and UIT Phase, aligned with Release Dates	4 Months
Transition to Operations and Go Live	D + 10 Months

6.2 SEC Release Allocation and Other Code Impacts

This Modification is expected to be implemented as part of the November 2022 SEC Release, however the allocation to a release may be dependent on other Modification timings and the suitability of a release. No functionality overlap with other Modifications has been identified at the time of undertaking this Impact Assessment.

6.3 Costs and Charges

This section indicates the quote for all phases of application development stage for this Modification. Note these costs assume a release of just this SEC Modification without any other Modifications or Change Requests in the release, which is not truly reflective of what the post-PIT test costs or programme duration will look like. A calculation of those costs will be carried out when the contents of the future Release are finalised, and the post-PIT costs determined through a "Grouping CR" also referred to as a "Release CR".

It should also be noted that the Post-PIT costs include the effort involved in the Installation & Commissioning (I&C) of test Devices (SMETS2+) and Migration of SMETS1 test Devices required to generate the Service Audit Trail records necessary to validate the solution. If the SEC Release in which this Modification is deployed contains other changes that require I&C/ Migration during Post-PIT testing, then costs for that activity will be shared across the Release.

£	Design, Build, and PIT	Integration Testing, SIT and UIT	TTO	Total
SECMP0141 Option 1	£105,981	£46,834	£6,016	**£158,831**
SECMP0141 Option 2	£124,301	£68,967	£6,571	**£199,839**

Design	The production of detailed System and Service designs to deliver all new requirements.
Build	The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented.
Pre-Integration Testing (PIT)	Each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. This is assured by DCC.
Systems Integration Testing (SIT)	All the Service Provider's PIT-complete solutions are brought together and tested as an integrated solution, ensuring all SP solutions align and operate as an end-to-end solution.
User Integration Testing (UIT)	Users are provided with an opportunity to run a range of pre-specified tests in relation to the relevant change.
Implementation to Live (TTO)	The solution is implemented into production environments and made ready for use by Users as part of a live service.

As part of the DCC negotiation with the DSP regarding the Contract Extension, some governance charges may be reduced for post-PIT phases. The negotiation is expected to be completed in October 2021.

6.3.1 Application Support Costs

Application Support costs have been calculated for a period of two months after the solution is implemented, and are referred to as Early Life Support.

SECMP0141 Option 1 Early Life Support	£8,015
SECMP0141 Option 2 Early Life Support	£8,346

6.3.2 Changes to the DSP Contract

The contract updates will be detailed within the CAN and will impact the following schedules:

- Schedule 2.1: Review to determine whether updates are required as a result of the new functional requirements outlined within this FIA;
- DCC Obligations will require new obligations for the DCC to achieve the deliverables under this Modification;
- Schedule 4.1: Solution Design documents will need to be updated;
- Schedule 6.1 - to reflect delivery milestones;
- Schedule 7.1: Define payments associated with Sch 6.1 milestones.

Appendix A: Risks, Assumptions, Issues, and Dependencies

The tables below provide a summary of the Risks, Assumptions, Issues, and Dependencies (RAID) observed during the production of the Full Impact Assessment. DCC requests that the Working Group considers this section and considers any material matters that have been identified. Changes may impact the proposed solution, implementation costs and/or implementation timescales.

Risks

Ref	Description	Status/Mitigation
MP141-R1	There is a risk to the availability of key resources throughout the duration of the implementation period as DSP workload reduces and resources are assigned elsewhere – potential risk to timescale and cost where resources may need to be reengaged	Accepted

Assumptions

These assumptions have been used in the creation of this Full Impact Assessment. Any changes to the assumptions may require DCC to undertake further assessment, prior to the contracting and implementation of this change**.**

Ref	Description	Status/Mitigation
MP141-A1	SECMP0141 will be included in the November 2022 SEC Release. The price breakdown, and work start-date is based on the November 2022 Release.	Open
MP141-A2	Device Alerts are out of scope of SECMP0141 and, thus, Supplier Parties and Network Operators will remain unable to see Device Alerts sent to other Service Users	Open
MP141-A3	The obligation on DCC to provide information to the Service Users in accordance with the requirements of SECMP0141 will be added to the Smart Energy Code.	Open

Issues

None at this time.

Dependencies

None at this time.

Appendix B: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
CR	DCC Change Request
DCC	Data Communications Company
DSP	Data Service Provider
EAST	Early Automated System Testing
FIA	Full Impact Assessment
HAN	Home Area Network
I&C	Installation and Commissioning
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
RSA	Registered Supplier Agent
SAT	Service Audit Trail
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specification
SRV	Service Request Variant
SSI	Self Service Interface
UIT	User Integration Testing

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MP141 'SRV Visibility for Devices on SSI'

Annex C

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 H 'DCC Services'

These changes have been redlined against Section H version 14.0.

Amend Section H8.16 (b) as follows:

H8.16 The Self-Service Interface must (as a minimum) allow the following categories of User to access the following:

(a) the Smart Metering Inventory, which shall be available to all Users and capable of being searched by reference to the following (provided that there is no requirement for the DCC to provide information held on the inventory in respect of Type 2 Devices other than IHDs):

(i) the Device ID, in which case the User should be able to extract all information held in the inventory in relation to (I) that Device, (II) any other Device Associated with the first Device, (III) any Device Associated with any other such Device; and (IV) any Device with which any of the Devices in (I), (II) or (III) is Associated;

(ii) the MPAN or MPRN, in which case the User should be able to extract all information held in the inventory in relation to the Smart Meter to which that MPAN or MPRN relates, or in relation to any Device Associated with that Smart Meter or with which it is Associated;

(iii) post code and premises number or name, in which case the User should be able to extract all information held in the inventory in relation to the Smart Meters for the MPAN(s) and/or MPRN linked to that postcode and premises number or name, or in relation to any Device Associated with those Smart Meters or with which they are Associated;

(iv) the UPRN (where this has been provided as part of the Registration Data), in which case the User should be able to extract all information held in the inventory in relation to the Smart Meters for the MPAN(s) and/or MPRN linked by that UPRN, or in relation to any Device Associated with those Smart Meters or with which they are Associated;

(b) a record of the Service Requests, ~~and~~ Signed Pre-Commands ~~sent by each User, and of the~~, Acknowledgments, Pre-Commands, Service Responses and Alerts sent in respect of each Smart Metering System~~received by that User~~ (during a period of no less than three months prior to any date on which that record is accessed), which shall be available only to the Responsible Supplier for that Smart Metering System and to the Gas Transporter or Electricity Distributor (as applicable) for that Smart Metering System~~that User~~;

(c) a record, which (subject to the restriction in Section I1.4 (User Obligations)) shall be available to all Users:

(i) of all 'Read Profile Data' and 'Retrieve Daily Consumption Log' Service Requests in relation to each Smart Meter (or Device Associated with it) that

were sent by any User during a period of no less than three months prior to any date on which that record is accessed; and

(ii) including, in relation to each such Service Request, a record of the type of the Service Request, whether it was successfully processed, the time and date that it was sent to the DCC, and the identity of the User which sent it;

(d) the Incident Management Log, for which the ability of Users to view and/or amend data shall be as described in Section H9.4 (Incident Management Log);

(e) the CH Order Management System, which shall be available to all Users;

(f) any and all information in respect of the SMETS1 SM WAN as the DCC is required to make available under the Self-Service Interface Access Control Specification and the SSI Baseline Requirement Document, which shall be made available to all Users; and the following information in respect of the SMETS2+ SM WAN, which shall be available to all Users (and which shall be capable of interrogation by post code and postal outcode):

(i) whether a Communications Hub Function installed in a premises at any given location:

(A) is expected to be able to connect to the SM WAN;

(B) Is expected to be able to connect to the SM WAN from a particular date, in which case the date shall be specified; or

(C) cannot be confirmed as being able to connect to the SM WAN;

(ii) any known issues giving rise to poor connectivity at any given location (and any information regarding their likely resolution); and

(iii) any requirement to use a particular WAN Variant (and, where applicable, in combination with any particular Communications Hub Auxiliary Equipment) for any given location in order that the Communications Hub will be able to establish a connection to the SM WAN;

(g) additional information made available by the DCC to assist with the use of the Services and diagnosis of problems, such as service status (including information in respect of Planned Maintenance and Unplanned Maintenance) and frequently asked questions (and the responses to such questions), which shall be available to all Users; and

(h) anything else expressly required by a provision of this Code.

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MP141 'SRV Visibility for Devices on SSI'

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP141 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	This modification appears to be a 'nice-to-have' feature for Suppliers, but it's difficult to see the value in this modification for the day-to-day use or how this could help with issue resolutions for a device, therefore we do not believe the cost is justified. Although only the titles of a SRV are displayed in the SAT, we believe there is no necessary reason for DNO to have visibility of communications between the Meter and the Responsible Supplier. This information can indicate the meter mode type, how often top-ups are made and where debt could have been applied, we believe it's in the best interest of the Energy Consumer to restrict the view of the SRVs to only the Responsible Supplier rather than other SEC Parties.
EDF	Large Supplier	Yes	EDF don't actively work all alerts, although alerts of this type do contribute to the total volume received and stored in our systems, so more knowledge about them could be useful in two respects: Provide validation that they are of no interest/impact to us which could mean switching them off in our systems and likely saving some database space which could improve system performance/speed The change could help with fault and meter health investigations if we understand more about them and deem them to be of value to us – assuming the SR's other parties have been sending could be indicative of faults or even cause meter health issues
Western Power Distribution	Electricity Network Party	Yes	We agree with the solution being put forward, we note that it refers to SRV's and Service Response's however we wonder if there is benefit to including alerts.
OVO	Large Supplier	Yes	Seeing the SRVs will greatly assisting in triaging and understanding what has taken place in relation to a device.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Electricity North West Limited	Electricity Network Party	Yes	The Proposed Solution to allow Supplier Parties and Network Operators to view all the titles of SRVs and Service Responses that have been associated with a Device that they own. This will aid the User in investigating any erratic behaviour of the affected Devices and help identify root cause issues and resolutions.
SSEN	Electricity Network Party	Yes	The solution proposed will allow us to check the Device for any SRVs sent by other SEC Parties which may help understand the reason for unsolicited alerts being received or communication issues. This solution also ensures that any confidential data will remain undisclosed to other parties.

Question 2: Will there be any impact on your organisation to implement MP141?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	As mentioned in Question 1, the benefit of this modification is unclear.
EDF	Large Supplier	No	We would expect to use the functionality to view all SRV's on an ad-hoc basis for query management purposes. We do not expect to make any additional changes to access the SSI Service Audit trail
Western Power Distribution	Electricity Network Party	Yes	The Proposed Solution will allow us to access the full list of SRVs and Service Responses a Device has either sent or received
OVO	Large Supplier	Yes	All positive as we will be provided with more information to allow us to investigate issues.
Electricity North West Limited	Electricity Network Party	No	The proposed solution will be an SSI report and therefore no explicit implementation or ongoing impact for the User.
SSEN	Electricity Network Party	Yes	We recognise that these impacts are all positive impacts which increase SRV visibility and further understanding of device behaviour.

Question 3: Will your organisation incur any costs in implementing MP141?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	-
EDF	Large Supplier	No	We do not expect any additional costs
Western Power Distribution	Electricity Network Party	No	There will be no additional costs to us beyond the implementation costs.
OVO	Large Supplier	No	Other than the costs we will incur if the Mod is cleared for implementation, although we're confused how the range of the cost is from £0 to £300K? How can this not cost anything and how do we influence this being zero cost to those impacted?
Electricity North West Limited	Electricity Network Party	No	The proposed solution will be an SSI report and therefore no explicit costs for the User.
SSEN	Electricity Network Party	No	None given

Question 4: Do you believe that MP141 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	As mentioned in Question 1, the benefit of this modification is unclear.
EDF	Large Supplier	Yes	We believe MP141 would facilitate SEC Objective (a) to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. Additionally we believe that the change would support SEC Objective (e) the fifth General SEC Objective by facilitating the operation of Energy Networks to the delivery of a secure and sustainable Supply of Energy;
Western Power Distribution	Electricity Network Party	Yes	We believe that this proposal will better facilitate SEC Objective (a) by ensuring the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers premises within Great Britain
OVO	Large Supplier	Yes	Yes, as defined in the Mod Report
Electricity North West Limited	Electricity Network Party	Yes	The Modification Proposal better facilitates General SEC Objective (a) where it would contribute to the better operation of Devices at a premise that are experiencing unusual activity and require investigating
SSEN	Electricity Network Party	Yes	As detailed in the Modification report, we agree that this modification will better facilitates General SEC Objective (a).

Question 5: Noting the costs and benefits of this modification, do you believe MP141 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	For the reasons already highlighted in Question 1
EDF	Large Supplier	Yes	The benefits should outweigh the costs, However, we note that the PIA ranges from £0 to £300k which is a very wide estimation of the costs
Western Power Distribution	Electricity Network Party	Yes	No response provided
OVO	Large Supplier	Yes	The more information we can obtain in investigating and looking at issues, the better.
Electricity North West Limited	Electricity Network Party	Yes	The Proposed Solution to allow Supplier Parties and Network Operators to view all the titles of SRVs and Service Responses that have been associated with a Device that they own. This will aid the User in investigating any erratic behaviour of the affected Devices and help identify root cause issues and resolutions.
SSEN	Electricity Network Party	Yes	Due to current issue resolution times and lack of information available related to device messages, we believe this modification should be approved.

Question 6: How long from the point of approval would your organisation need to implement MP141?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	NA	NA
EDF	Large Supplier	6 months	This would allow sufficient time to prepare for any changes
Western Power Distribution	Electricity Network Party	N/A	We do not have any additional changes to make and therefore do not require any lead time.
OVO	Large Supplier	N/A	No work is required of us in implementing this change.
Electricity North West Limited	Electricity Network Party	n/a	The proposed solution will be an SSI report and therefore no explicit implementation or ongoing impact for the User.
SSEN	Electricity Network Party	N/A	N/A

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	NA	NA
EDF	Large Supplier	Yes	We agree that the change should be targeted for the November 2022 SEC Release)
Western Power Distribution	Electricity Network Party	Yes	We believe that this modification should be implemented as soon as possible.
OVO	Large Supplier	No	The Modification report does not define why this SSI only change needs to be linked to a SEC release. The SEC changes are not defined in the Report and there is a possibility this change could cost £0.. so why will it take over a year (17 months from now) to be implemented? What changes do SEC Parties need to make in order to be ready for this Mod to happen? None of this is called out in the Mod report so cannot be considered.
Electricity North West Limited	Electricity Network Party	Yes	The Proposed Solution to allow Supplier Parties and Network Operators to view all the titles of SRVs and Service Responses that have been associated with a Device that they own. This will aid the User in investigating any erratic behaviour of the affected Devices and help identify root cause issues and resolutions.
SSEN	Electricity Network Party	Yes	We agree with the proposed target dates outlined in the modification proposal.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP141 is implemented?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	Yes	As mentioned in Question 1, Energy Consumer information, albeit information taken from titles of an SRV should not be shared unnecessarily with other SEC Parties.
EDF	Large Supplier	Yes	Consumers could benefit through improve query resolution and dispute management processes.
Western Power Distribution	Electricity Network Party	None	We can see that this could benefit consumers in that it will help parties to identify and resolve issues with devices, however we acknowledge that there is not necessarily a direct impact or benefit to consumers.
OVO	Large Supplier	Yes	The inability to see all the SRVs applicable to a device has led to site visits and delays in dealing with issues and problems. This will benefit them by allowing us to obtain more information and establishing, in some situations, the issues faced.
Electricity North West Limited	Electricity Network Party	Yes	The Modification Proposal better facilitates General SEC Objective (a) where it would contribute to the better operation of Devices at a premise that are experiencing unusual activity and require investigating. This will lead to more efficient use of the smart meter system.
SSEN	Electricity Network Party	Yes	We believe that this solution may allow for SEC Parties to resolve meter communication issues more efficiently as there will be increased information relating to traffic to and from the device which should assist in quicker resolution.

Question 9: Are there any additional benefits your organisation would receive from the proposed solution, other than being able to action SRV's and service responses or investigating erratic device behaviour?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
Utilita	Large Supplier	No	-
EDF	Large Supplier	No	Not that we can immediately think of
Western Power Distribution	Electricity Network Party	No	-
OVO	Large Supplier	No	None that haven't been drawn out in the Modification working group and DCC DRF discussions on the matter.
Electricity North West Limited	Electricity Network Party	No	-
SSEN	Electricity Network Party	No	-

Question 10: Please provide any further comments you may have

Question 10		
Respondent	**Category**	**Response and rationale**
Utilita	Large Supplier	No further comments
EDF	Large Supplier	MP141 feels like a good future proofing opportunity
Western Power Distribution	Electricity Network Party	No
OVO	Large Supplier	Other than wanting to understand the reason for this Mod being linked directly to a SEC Release meaning it will take longer to be implemented. Understanding that and the work done recently on improving changes to the SEC would be appreciated.
Electricity North West Limited	Electricity Network Party	-
SSEN	Electricity Network Party	-