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MP140 'CH Stock Transfer'

Annex E

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP140 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	-
IMServ Europe Ltd	Other SEC Party	Yes	Giving parties the opportunity to move stock between them without having to return stock directly back to the DCC first whilst removing unnecessary charges has to be a positive. Given the current industry issues regarding COVID-19, manufacturing and the number of suppliers entering the SoLR process having a process of moving Comms Hubs directly between themselves could have positive benefits for all concerned.
British Gas	Large Supplier	Yes	This seems a sensible approach, to benefit both those suppliers with excess stock, and those who have a shortfall, particularly in the light of delivery delays. It is more efficient than the current situation of stock changes physically having to take place via the DCC.

Question 2: Do you believe there is a requirement to have a dispute process specifically for Communications Hub Transfers, set out in within the SEC?

Question 2			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	We think that it would be beneficial to have a dispute process to manage these if they come up.
IMServ Europe Ltd	Other SEC Party	Yes	Moving stock between different parties may raise question on ownership particularly when it comes to charges without an agreed dispute process it may be difficult to find an agreed resolution on any disputes.
British Gas	Large Supplier	Yes	Yes. We presume that all parties will act in good faith, and there should be minimal disputes (for instance where less CHs are made available for collection than confirmed on the file, or where the CHs that arrive have outdated firmware). However, without the stock physically transferring via the DCC, there needs to be a dispute process.

Question 3: If you do believe there is a requirement for a specific Communications Hub Transfer dispute process, do you believe there should also be a specific appeals process ?

Question 3			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	There should not be a dispute process without a reciprocal appeals process to be hand in hand with this.
IMServ Europe Ltd	Other SEC Party	Yes	If there is to be a transfer dispute process then we would suggest there is also a need for a process to appeal an outcome, without wanting to make the process drawn out and complicated.
British Gas	Large Supplier	Yes	Yes, if there is a dispute process, there should also be an appeals process. However, too long a dispute/appeals time frame may result in neither supplier being able to use the disputed assets, so the overall time frame for dispute/appeals should be concise.

Question 4: Do you agree that the legal text will deliver MP140?

Question 4			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	-
IMServ Europe Ltd	Other SEC Party	Yes	We agree that the legal text will deliver MP140
British Gas	Large Supplier	-	-

Question 5: Do you agree with the proposed implementation approach?

Question 5			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	In principal, yes.	It gives suppliers greater flexibility to transfer excess stock to SEC Parties who have demand for them, rather than returning CHs to the DCC and incurring refurbishment and returns costs. The targeted implementation date of 3 November 2022, at the earliest, so there is no imminent pressure to do anything either.
IMServ Europe Ltd	Other SEC Party	Yes	We agree with the implementation approach but feel that we would receive greater benefit if included in the November 2022 release rather than waiting until June 2023.
British Gas	Large Supplier	Yes	It seems an appropriate approach.

Question 6: Will there be any impact on your organisation to implement MP140?

Question 6			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	<p>There might be some sticking points further down the line as:</p> <p>Suppliers will need to do a bit of work, putting in requests, providing lists of assets, and interacting with other users to facilitate transfer. Increases costs that are not easily quantified.</p> <p>Meter Asset Providers (MAPs) might also be impacted by this modification. Confirmation on the impacts is sought via the Refinement Consultation</p> <p>The SEC Party offloading their CH units would remain responsible for the Device until it had been delivered successfully, meaning that it will be the responsibility of the transferring Party to ensure the CH units are delivered</p>
IMServ Europe Ltd	Other SEC Party	Yes	-
British Gas	Large Supplier	Yes	<p>We assume that the implementation of MP140 will use the same systems and file formats. I.e. OMS (check correct?) to order and forecast. The ASN file format is the most important aspect – the impact on our organisation to implement MP140 will be minimal if the file format is the same as we currently receive.</p>

Question 7: Will your organisation incur any costs in implementing MP140?

Question 7			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	Hard to define but anything requiring work our side comes with cost.
IMServ Europe Ltd	Other SEC Party	Minimal	We believe the costs to implement the solution would be minimal based on our current processes and procedures
British Gas	Large Supplier	No costs	Realistically, we are more likely to use this modification to acquire extra stock, rather than dispose of stock. There should not therefore be any significant costs (except for collection transport?), provided the ASN file is in the same format.

Question 8: How long from the point of approval would your organisation need to implement MP140?

Question 8			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Not long	-
IMServ Europe Ltd	Other SEC Party	Almost immediately	Based on our current processes and procedures
British Gas	Large Supplier	0 months	We would be able to use it immediately.

Question 9: Do you believe that MP140 would better facilitate the General SEC Objectives?

Question 9			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	-
IMServ Europe Ltd	Other SEC Party	Yes	-
British Gas	Large Supplier	Yes	It would better facilitate General SEC Objective (a).

Question 10: Do you believe there will be any impacts on or benefits to consumers if MP140 is implemented?

Question 10			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	Anything that affects and impacts costs will have a knock on impact to consumers. Improving the ability to manage CHs will, hopefully, reduce costs.
IMServ Europe Ltd	Other SEC Party	Yes	Continuity of service and installation programmes, the ability to effectively move stock between parties could reduce shortfalls whilst operating under the Temporary forecasting and ordering process.
British Gas	Large Supplier	Yes	If anything, this would be a benefit to consumers – as it would ensure smart installations could still go ahead, giving a cost effective way for a supplier with a CH stock deficit to arrange stock transfer from a second supplier with excess CH stock.

Question 11: Noting the costs and benefits of this modification, do you believe MP140 should be approved?

Question 11			
Respondent	Category	Response	Rationale
OVO Energy	Large Supplier	Yes	We believe that the benefits outweigh the costs.
IMServ Europe Ltd	Other SEC Party	Yes	-
British Gas	Large Supplier	Yes	-

Question 12: Please provide any further comments you may have

Question 12		
Respondent	Category	Comments
OVO Energy	Large Supplier	-
IMServ Europe Ltd	Other SEC Party	-
British Gas	Large Supplier	None