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MP192 ‘Extend Scheduled Services for SMETS1 Devices’

Annex C

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP192 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
Shell Energy	Large Supplier	No	Given some SMETS1 Device behaviours are to not record data to the Billing Data Log on mode or tariff, then the only consistent use for SRV4.4.3 would be for TOU and Total Registers readings (aka Consumption Register / Active Import Register readings) for example. In which case a schedule read service is already available via SRV5.1 for SRV4.6.1 to retrieve the Import Daily Read Log. We therefore don't believe that the change for a scheduled SRV4.4.3 service is justified. This leaves only SRV4.3 needing a solution.	
Utilita Energy Limited	Large Supplier	Yes	Allowing SRVs 4.3 and 4.4.3 to be scheduled enhances the efficiency of data retrieval and resolves the identified issue.	
OVO Energy	Large Supplier	We're happy with the proposed changes	-	
EDF Energy	Large Supplier	Yes	The solution probably does resolve the issue for those that have one. We do not currently want to change out	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>processes to schedule 4.3 'Read Instantaneous Prepay Values' and SRV 4.4.3 'Retrieve Billing Calendar Triggered Billing Data Log' for SMETS1 devices</p> <p>We certainly would not wish to be mandated to schedule them</p>	
E.ON Energy	Large Supplier	Yes	<p>Although, we would like to explore whether the DCC needs to implement both 4.3 and 4.4.3 for this. We believe the two overlap and implementing both introduces additional costs that may not be necessary. Will only implementing 1 of these present any cost savings through less testing being required?</p>	<p>The DCC has advised the vast majority of the cost is due to impacting the DCC User Interface Specification (DUIS), as well as changing the Extensible Markup Language (XML) Schema, and testing the solution; so there would be a minimal cost saving in addressing a single SRV.</p>

Question 2: If SRVs 4.3 and 4.4.3 were eligible for Scheduled Services for SMETS1 Devices, would you expect to use this service considering the Target Response Time (TRT) of 24 hours?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	No	<p>With regard to a scheduled SRV4.3, the solution relies on the unhelpful 24 hour TRT. Although our use of the data from the 4.3 response is less time critical, the solution does not offer an effective solution against the possibility of data being up to 24 hours old. In practice we have yet to see the very late returns of reads / data from the DCC scheduled services, so it does indicate that with today's volumes the DCC is routinely delivering within the 24 hour window. We would welcome DCC raising modifications that consider today and future volumes for scheduled services with a view to improve TRT – for example, a maximum TRT of 8 hours (ideally 6 hours) so that such data is available overnight (when typically schedules services are started just after midnight) ready for the start of the working day, as a more effective solution, generally.</p> <p>We would need to review and assess if and when a scheduled SRV4.3 service would be utilised against other priorities at the time of the DCC proposed release and its support within our third party DCC adaptor solution. At</p>	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			the moment, we do not see direct benefit in such a change.	
Utilita Energy Limited	Large Supplier	Yes	SRVs 4.3 and 4.4.3 are an essential part of BAU prepayment operations. As such, we require this data daily, and in a timely manner. We support implementing the DCC schedulable solution as it is more cost efficient than increasing network capacity.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	No	We currently do see the need to schedule these services.	
E.ON Energy	Large Supplier	Yes	-	

Question 3: Do you agree that the legal text will deliver MP192?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Yes	Subject to whether inclusion of change for scheduled SRV 4.3 is really justified.	
Utilita Energy Limited	Large Supplier	Yes	No comments.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	Yes	Its seems appropriate to support the capability proposed	
E.ON Energy	Large Supplier	Yes	Although, along with response to Q1, do we need to utilise both?	

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

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Yes	The statement, under Section 6 for the Implementation Approach that “The DCC has advised a solution to the issue is needed as soon as possible before Suppliers start to implement their own workarounds” is inaccurate. We already have workarounds necessitated by the current lack of an effective solution using schedule services, despite the issue being raised in Feb 2020. Surely DCC is aware that there have been significant migrations of SMETS1 meters already completed, and suppliers would need to provide prepayment services to customers with these meters.	
Utilita Energy Limited	Large Supplier	Yes	We would like to see this modification progressed for implementation in the June 2022 SEC Release. Traffic for 4.3 and 4.4.3 will increase as more SMETS1 meters are migrated to the network. Implementing a solution sooner is therefore preferable.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	No	We are concerned that there is a sufficient business case as we already have a workaround for SMETS1 devices.	
E.ON Energy	Large Supplier	Yes	-	

Question 5: Do you agree with the DCC's estimated volumes of 2.7 million additional SRVs being requested at midnight each day if this issue is not resolved?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	No	We don't understand the calculation, as the assumptions are not fully explained. 16% of 16 million is 2.56 million, assuming a single daily SRV4.3 per SMETS1 meter operating in prepayment mode. Then there would be additional volume from the SRV4.3s, may be assuming a monthly frequency? Therefore, 1/28th of 16 million per day on average (though this is perhaps not a safe assumption of an even spread of bill cycle days during the month across all suppliers, with varying portfolio sizes and billing policies) for SRV4.4.3 is 0.57M additional messages per day. Giving a possible total of 3.13M additional SRVs per day, not 2.7 million.	<p>The DCC has provided further information on the business case from a Data Services Provider (DSP) and SMETS1 Service Provider perspective:</p> <p>The DSP advised that assuming Suppliers schedule SRVs 4.3 and 4.4.3 at midnight and they entered the DSP within an hour, then that would be about 750 extra transactions per second, which is equal to two extra DSP motorway lanes to carry the extra traffic. Those lanes would then sit unused for the rest of the day. The most recent estimate from the DSP is £350,000 per lane, giving £700,000.</p> <p>The DCC noted the impacts on the SMETS1 Service Providers are more difficult to calculate. The impacts would be greatest on the Middle Operating Capability (MOC) and Final Operating Capability (FOC) cohorts – both of which have a long way to go on their migrations.</p>
Utilita Energy Limited	Large Supplier	Yes	We agree that this assumption seems fairly accurate. We send this daily to every prepayment meter - ~1.2 million meters.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	No	We don't have a view on the evidence provided	
E.ON Energy	Large Supplier	No	While the figures may be accurate of SMETS1 PAYG meters on the walls an operating withing the DCC, has the DCC accounted for suppliers not utilising the daily	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			<p>request (maybe preferring to use it weekly/monthly) and those that would use this at all?</p> <p>Is the 2.7 million figure seen as a maximum/worst case scenario by the DCC, as opposed to an actual?</p> <p>Has the DCC consulted suppliers on the demand for this and the typical scheduling likely from suppliers??</p>	<p>The expected increase would send both of them a long way over their contracted Transactions per Second (TPS) rates, with significant changes in processing capacity and infrastructure. There would also be a requirement for a Dual Control Organization (DCO) uplift and potentially a functional change which would be difficult to achieve especially while the migrations are ongoing, and very costly. The DCC estimated that figure to be £1.5million with a high tolerance and risk associated. They added this would probably impact the subscriber identity module (SIM) operators as well, requiring SIM changes and more network capacity.</p>

Question 6: Will there be any impact on your organisation to implement MP192?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Yes	Unpicking existing workarounds; creating and sending the new scheduled services requests for existing endpoints to replace the workarounds for each required meter; subject to the form of support and implementation by our third party DCC adaptor provider.	
Utilita Energy Limited	Large Supplier	Yes	This modification could impact how we intend to schedule retrieval of data. Changes would be required to systems to interact with the new DUIS version, allowing scheduling of SRs through the DCC. The overall impact would be positive.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	Yes	The cost of paying for something that we don't plan to use	
E.ON Energy	Large Supplier	Yes		

Question 7: Will your organisation incur any costs in implementing MP192?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Less than £100k	Development sprint work (assuming our third party DCC adaptor provider absorbs / recovers their development fees for this change in their existing service fees)	
Utilita Energy Limited	Large Supplier	Less than £100k	Costs are associated with moving to a newer version of DUIS and testing of the solution. We would expect costs to be relatively minimal and outweighed by the benefits of this modification.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	Less than £100k	We don't plan to use the solution	
E.ON Energy	Large Supplier	Yes - TBC		

Question 8: How long from the point of approval would your organisation need to implement MP192?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Unclear	Subject to unknown adaptor provider development and support timescales and other development priorities at the time given we already have a solution.	
Utilita Energy Limited	Large Supplier	N/A	June 2022 SEC release would provide us with enough time to make any associated changes.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	-	-	
E.ON Energy	Large Supplier	6 to 12 months		

Question 9: Do you believe that MP192 would better facilitate the General SEC Objectives?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	Yes	Subject to earlier comments	
Utilita Energy Limited	Large Supplier	Yes	A – the solution makes better use of the DCC network through reducing the potential of large traffic spikes, facilitating the efficient operation of Smart Metering Systems.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	No	It is unclear whether there is any business case other than protecting the DCC slightly	
E.ON Energy	Large Supplier	Yes	We are in agreement with the proposer that this would better facilitate SEC Objective (a)	

Question 10: Do you believe there will be any impacts on or benefits to consumers if MP192 is implemented?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	No	No change or benefit to Consumers	
Utilita Energy Limited	Large Supplier	N/A	Consumers should not be impacted provided that the functionality to retrieve this data already exists.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	Yes	Only if the scheduling is used and benefits realised for the industry. That is not clear	
E.ON Energy	Large Supplier	No	Although, potentially it could offer a better PAYG journey because more up-to-date information is readily available to the supplier.	

Question 11: Noting the costs and benefits of this modification, do you believe MP192 should be approved?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
Shell Energy	Large Supplier	No	A reliable cost of 'do nothing' is needed before considering whether MP192 should be approved.	
Utilita Energy Limited	Large Supplier	Yes	These SRVs will be required daily and at volume. Allowing these SRs to be scheduled will make better use of the DCC network.	
OVO Energy	Large Supplier	-	-	
EDF Energy	Large Supplier	No	We do not plan to use the solution	
E.ON Energy	Large Supplier	No	<p>While we believe this SEC Mod is useful for the industry, we would like to explore whether the DCC needs to implement both 4.3 and 4.4.3 for this. We believe the two overlap and implementing both introduces additional costs that may not be necessary.</p> <p>Also, we'd need to understand more on the DCC assumption of additional traffic because while we agree with their assumptions on the number of SMETS1 devices in PAYG (as they should hold the data on this), we don't believe their assumptions are correct in those numbers representing the additional number of SRs, as supplier behaviour/implementation may differ.</p>	

Question 12: Please provide any further comments you may have

Question 12			
Respondent	Category	Comments	SECAS Response
Shell Energy	Large Supplier	<p>Most DCC users will have had to create their own scheduling mechanism for these SRVs within their own systems, as the DCC offer of a solution is too late. Therefore, the primary motivation for MP192 is to avoid the need for DCC to invest in additional infrastructure capacity to fulfil the extra SRVs.</p> <p>A more fundamental assessment of the approach to collecting scheduled data from SMETS1 and SMETS2 devices may prove more beneficial than reacting to these individual SMETS1 driven requirements and deliver a step change reduction in costs. For example, a move from a DSP 'pull' model to a Device 'push' model, would recognise that (pushed) alerts which already dominate the infrastructure capacity today, could deliver such scheduled data.</p>	
Utilita Energy Limited	Large Supplier	No comments.	
OVO Energy	Large Supplier	-	
EDF Energy	Large Supplier	-	
E.ON Energy	Large Supplier	-	