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MP181 ‘Meter Asset Provider access to asset related data held by the DCC’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP181 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
Vantage Meters Investments Limited	Other SEC Party	Yes	Receiving the data proposed will allow us as a MAP to more successfully manage the portfolio of meters we own.	
Electricity North West Limited	Network Party	Yes	Whilst as a Network Party we aren't directly impacted we are supportive of proposal that will help ensure Device firmware is kept up to date.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	The DCC is the only central point that can efficiently provide this data to MAPs to monitor our assets.	
Calvin Capital Limited	Other SEC Party	Yes	This will provide MAPs and manufacturers means to validate information on devices and the firmware versions, which are operating in the DCC. This will provide accurate information to MAPs to track the health of our assets and confirm firmware information	
Northern Powergrid Metering Limited	Other SEC Party	Yes	This modification will allow Northern Powergrid Metering Limited (NPML) to monitor the asset health of NPML owned assets.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we own.	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we own.	
BUUK	Network Party	Yes	Access to source data for the proposed data items will facilitate more effective asset management, provided that the explicit charges agreed for the report are proportionate & not prohibitive.	
British Gas	Large Supplier	Yes	<p>It seems sensible to allow MAPs and Manufacturers access to this data, for just their own assets.</p> <p><u>MAPs</u></p> <p>This modification solution will allow MAPs direct access to the information listed on their assets, rather than going through the Energy Supplier. This is information they already have access to, but this access will be quicker and more direct, and is potentially more accurate/up to date.</p> <p>From a privacy viewpoint: allowing MAPs access to the data on their meters directly will not tell them anything they don't already know on a customer level. MAPs already have the GUIDs mapped across to MPXN numbers.</p> <p>However, it will allow them to check their existing data for errors, particularly by confirming the Supplier ID.</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>The MAPs will have a Supplier ID on their database. Originally this will be the installing Supplier. However, once customers churn, if the right data flows haven't been sent to the MAP, the Supplier ID on their records may not be accurate. Direct access to DCC data will allow the MAPs to validate the Supplier name on their system, and make sure they are contacting and billing the correct supplier.</p> <p><u>Manufacturers</u></p> <p>Allowing Manufacturers access to the data on their meters directly will help ensure consistency on firmware updates, etc. It will not give them any further customer level information, as the meters will still just be identified by their GUID.</p>	
SGN Smart	Other SEC Party	Yes	Receiving data from DCC will enable us as a MAP to monitor asset health for devices we have invested in and own.	
ScottishPower Energy Retail	Large Supplier	Yes	MAPs require a limited cut of data from the DCC inventory to cover the MAP asset base in order to aid management of their estate. The data cut is proposed to be delivered by the DCC TOC team as an estate report.	
Landis+Gyr	Other SEC Party	Yes	The availability of this data in this way is logical and provides manufacturers and MAPs with the data.	
E.ON	Large Supplier	Yes	We believe it fulfils the issue identified.	

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Question 2: Do you agree that the legal text will deliver MP181?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, the legal text proposed is sufficient to deliver MP181.	
Electricity North West Limited	Network Party	Yes	See our response to Q1.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	It is correctly drafted.	
Calvin Capital Limited	Other SEC Party	Yes	The text covers the requirements.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	The legal text provided will deliver this modification.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	The legal text will deliver MP181.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	The legal text will deliver MP181.	
BUUK	Network Party	Yes	N/A.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	<p>We agree that the legal text will deliver MP181, but have two comments to make:</p> <p><u>Wording clarity (around definition of 'report')</u></p> <p>It is a bit unclear in the legal text whether a “report” is a single line of data on one Meter, or a full list of data for all Meters relevant to that MAP or Manufacturer.</p> <p>Could I suggest that H17.5 is amended to say that “Each report under this Section H17 will set out for each Smart Meter (for which the receiving party is the Manufacturer or Meter Asset Provider):”</p> <p>The legal text needs to be really clear that there will be an individually tailored report sent each time (to each MAP or Manufacturer), depending on which Smart Meters it includes.</p> <p><u>Need for additional T&Cs</u></p> <p>There are no obligations in the legal text on the Meter Asset Provider or Manufacturer as to what restrictions exist as to what they do with the data they receive. This doesn't feel right – although the more appropriate place for this might be in the new T&Cs, rather than in the SEC text.</p>	SECAS will raise your comments with the Proposer and SEC Lawyers and make amendments accordingly.
SGN Smart	Other SEC Party	Yes	The legal text has been supported by MAPs and will deliver MP181.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	
Landis+Gyr	Other SEC Party	Yes	No comment.	
E.ON	Large Supplier	Yes	No comment.	

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes I believe the proposed implementation approach and timescales are adequate.	
Electricity North West Limited	Network Party	Yes	See our response to Q1.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Finally!	
Calvin Capital Limited	Other SEC Party	Yes	We are keen to have reports available as soon as possible so are supportive of the approach.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	The implementation of this modification should be delivered as soon as possible.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	Yes	As access to the data sets would improve ongoing operations, we support a 03 November 2022 implementation.	
British Gas	Large Supplier	Yes	<p>Seems sensible.</p> <p>In general, we are happy with the proposed implementation approach.</p> <p>The MAP validation process of sending in a list of GUIDs doesn't seem very scientific or robust. However, if SECAS (or DCC) have the right level of checks in place we can't see it being a material risk.</p> <p>We assume that there will be T&Cs for this new service for MAPs and Manufacturers, and these will include data protection, confidentiality etc, plus some general restrictions on what the information can / can't be used for. (For example, it can't be sold on to third parties, etc.)</p>	
SGN Smart	Other SEC Party	Yes	Timescales proposed and approach will deliver the solution as quickly as possible.	
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	
Landis+Gyr	Other SEC Party	Yes	No comment.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
E.ON	Large Supplier	No	<p>E.ON's Supplier and MAP functions will support the proposed implementation when there is clarity around the confidentiality controls that will be introduced with this approach.</p> <p>Aside from evidencing that the MAP is the asset owner, the solution proposed doesn't appear to introduce any confidentiality arrangements to prevent third parties from inappropriately using the considerable amount of detailed data that would be provided by the DCC.</p>	SECAS will inform the Proposer and the Working Group of your comments which may lead to amendments to the legal text.

Question 4: Will there be any impact on your organisation to implement MP181?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Only a minor impact expected in generating and delivering the requested GUID reporting to the DCC via methods to be determined. The benefit far outweighs any effort involved.	
Electricity North West Limited	Network Party	No	See our response to Q1.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Minor administrative activity to be able to access reports but this was always expected and it is ultimately to our benefit.	
Calvin Capital Limited	Other SEC Party	No	No impact.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	This will require minimal effort to implement and we will see an almost immediate positive impact on the business as it will improve visibility on all NPML owned assets.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	This is minor effort for us and the benefit of the modification far outweighs the time allocated to implementing this modification.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	This is minor effort for us and the benefit of the modification far outweighs the time allocated to	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			implementing this modification. Horizon already has a similar process in place with Xoserve.	
BUUK	Network Party	No	N/A.	
British Gas	Large Supplier	No	We already have obligations in our MAP contracts to supply certain information. This will simply be allowing MAPs to access that data directly from DCC, should they prefer. Individual MAPs will now have two routes to the same information.	
SGN Smart	Other SEC Party	No detrimental impact	This is minor effort for us and the benefit of the modification far outweighs the time allocated to implementing this modification.	
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	
Landis+Gyr	Other SEC Party	Yes	Clearly MAPs and manufacturers will bear a cost which is unknown at this point.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	Yes	We would have to set up processes to request the reports and generate the information required.	

Question 5: Will your organisation incur any costs in implementing MP181?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	No costs	Little to no costs expected.	
Electricity North West Limited	Network Party	No costs	See our response to Q1.	
Smart Meter Assets 1 Limited	Other SEC Party	No costs	Any costs will be negligible and absorbed within our business with possible benefits to outweigh the costs.	
Calvin Capital Limited	Other SEC Party	Less than £100k	Limited costs associated with setting up a process around reporting. Plus the minimal amount for this service, but the benefit of us having this information far outweighs the charge.	
Northern Powergrid Metering Limited	Other SEC Party	No costs	This modification requires minimal costs for NPML to set up.	
ScottishPower Smart Metering Assets Ltd	N/A	No costs	Costs will be minimal.	
Horizon Energy Infrastructure Limited	Other SEC Party	No costs	Costs will be minimal.	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	No costs	We would again request that explicit charges for the report are proportionate & not prohibitive appreciating the positive impact that access to this data would have on the end consumer through more effective asset management.	
British Gas	Large Supplier	No costs	We do not expect to incur any costs.	
SGN Smart	Other SEC Party	No costs	Costs will be minimal.	
ScottishPower Energy Retail	Large Supplier	No costs	No comment.	
Landis+Gyr	Other SEC Party	Less than £100k	This question seems aimed at the DCC not manufacturers or MAPs but there is a cost to us which is as yet unknown.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	No costs	Minor set up costs, expected to be minimal if any.	

Question 6: How long from the point of approval would your organisation need to implement MP181?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	This can be implemented as soon as MP181 is approved	Minimal work required to generate the required reporting.	
Electricity North West Limited	Network Party	N/A	N/A.	
Smart Meter Assets 1 Limited	Other SEC Party	Almost immediately	Minimal activity that can be planned in advance.	
Calvin Capital Limited	Other SEC Party	Less than a month	Minimal time impact, we have the information available to be provided to DCC for their validation.	
Northern Powergrid Metering Limited	Other SEC Party	Immediately, this will take around three weeks for NPML to start seeing the benefits	NPML already have processes in place to capture the data from this modification.	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
		of this modification		
ScottishPower Smart Metering Assets Ltd	N/A	We can implement this modification immediately. A few weeks at most	No internal system changes required.	
Horizon Energy Infrastructure Limited	Other SEC Party	We can implement this modification immediately. A few weeks at most	This is a similar process to the one we run with Xoserve.	
BUUK	Network Party	N/A	N/A.	
British Gas	Large Supplier	No time required (Large Supplier)	No time required.	
SGN Smart	Other SEC Party	We would be able to implement	This is a similar process to the one we run with Xoserve.	

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Question 6				
Respondent	Category	Response	Rationale	SECAS Response
		this modification almost immediately.		
ScottishPower Energy Retail	Large Supplier	N/A	No comment.	
Landis+Gyr	Other SEC Party	N/A	No comment.	
E.ON	Large Supplier	3 months	No comment.	

Question 7: Do you believe that MP181 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, we believe MP181 would aid and facilitate the General SEC objectives by allowing us to ensure our portfolio is running on the optimum firmware combinations and that meters are installed in a DCC active state. It will also allow us to quickly and accurately identify any detrimental trends to ensure the SMIP is operating as planned.	
Electricity North West Limited	Network Party	Yes	We agree it will better facilitate SEC Objective (a) the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	
Calvin Capital Limited	Other SEC Party	Yes	Access to device and firmware data will enable us to support the facilitation and maintenance of healthy devices, those operating in smart mode and with appropriate firmware.	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Northern Powergrid Metering Limited	Other SEC Party	Yes	This will better facilitate SEC Objective A and C, allowing us to better provide suppliers with information regarding optimal firmware and device model combinations on NPML meters.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	
BUUK	Network Party	Yes	We agree with the proposer that MP181 better facilitates General SEC Objectives: (a)2: Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain. (c)3: Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.	
British Gas	Large Supplier	Yes	We agree that this better facilitates General SEC Objectives A and C.	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
SGN Smart	Other SEC Party	Yes	We believe that this modification will better facilitate SEC objectives a and c, as the proposed solution will aid suppliers in the provision of optimum smart meter firmware combinations.	
ScottishPower Energy Retail	Large Supplier	Yes	The MOD will facilitate SEC Objective (a) by affording MAPs the opportunity to better manage their asset bases.	
Landis+Gyr	Other SEC Party	Yes	This data does enable manufacturers and MAPs to assist suppliers in their management of assets in the field and to provide information for reporting to relevant authorities (eg SSC).	
E.ON	Large Supplier	Yes	We believe the modification supports the SEC objectives in line with the proposer (a and c).	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP181 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Trend analysis as discussed in question 7 and a better understanding of smart meters installed will allow asset owners to ensure they're working as expected and on the most appropriate firmware combination. Ultimately, this leads to a more robust and reliable user experience for consumers.	
Electricity North West Limited	Network Party	N/A	No comment.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Lower costs (through efficiency of solution) will reduce industry costs which are, ultimately, borne by consumers.	
Calvin Capital Limited	Other SEC Party	Yes	We will be able to support suppliers in providing devices which operate as smart, are accurate in reporting consumption, have appropriate security controls in place (through firmware) and therefore provide the optimum benefits to consumers.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	Better firmware management for smart meters will lead to more Device issues being resolved and a better user experience for energy consumers.	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
ScottishPower Smart Metering Assets Ltd	N/A	Yes	Access to data will help MAPs understand how their Estates are performing. In the long term, this will assist in understanding long term costs and will ultimately maximise the life of the asset on the wall. Installation of smart meters will also allow consumers to better manage their energy usage.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	Installation of smart meters will also allow consumers to better manage their energy usage.	
BUUK	Network Party	Yes	Consumers will be positively impacted through more effective asset management. For example device firmware update data will ensure that devices are updated & fit for purpose.	
British Gas	Large Supplier	No	No direct impact, but overall this modification should help to improve the processes for making sure everyone's meter is up to date with the latest firmware, particularly for assets which have churned.	
SGN Smart	Other SEC Party	Yes – positive benefits	No comment.	
ScottishPower Energy Retail	Large Supplier	Yes	If implemented, MP181 will afford MAPs the opportunity to better manage their metering assets, thereby extending	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			lifetimes and delivering a better consumer experience of Smart Metering.	
Landis+Gyr	Other SEC Party	No	No comment.	
E.ON	Large Supplier	Minimal	More information shared with relevant stakeholders within the industry will ultimately benefit all, but end consumers of smart are not likely to benefit directly from the sharing of data. Associated or resulting activities will indirectly benefit energy consumers.	

Question 9: Noting the costs and benefits of this modification, do you believe MP181 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, this modification should be approved.	
Electricity North West Limited	Network Party	Yes	See our response to Q1 and Q7.	
Smart Meter Assets 1 Limited	Other SEC Party	Yes	The business case is sound with users of the service happy to pay for it.	
Calvin Capital Limited	Other SEC Party	Yes	We are supporting of this change and associated costs.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	This is a modification to allow the DCC to provide a service NPML as a MAP intend to pay for.	
ScottishPower Smart Metering Assets Ltd	N/A	Yes	As a MAP we expect to be charged for this service.	
Horizon Energy Infrastructure Limited	Other SEC Party	Yes	As a MAP we expect to be charged for this service.	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
BUUK	Network Party	Yes	N/A.	
British Gas	Large Supplier	Yes	We agree it should be approved.	
SGN Smart	Other SEC Party	Yes	As a MAP we expect and accept that there will be charges to use the service.	
ScottishPower Energy Retail	Large Supplier	Yes	No comment.	
Landis+Gyr	Other SEC Party	Yes	It is hard to answer this as we have no idea of the DCC pricing structure but allowing DCC to develop this is a step forward.	SECAS will request an update from the DCC regarding the costing mechanism for the Working Group as well as the Modification Report.
E.ON	Large Supplier	Yes	Subject to the issue highlighted in Question 3 around confidentiality we believe there is a benefit to this modification. However, final decision should be based on what the Explicit Charge is from the DCC, as that has not yet been outlined in the modification report.	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Vantage Meters Investments Limited	Other SEC Party	MP181 will benefit the whole SMIP, ensuring MAPs have access to data for assets they own, meaning there is more momentum behind correcting troublesome sites.	
Electricity North West Limited	Network Party	No comment.	
Smart Meter Assets 1 Limited	Other SEC Party	No comment.	
Calvin Capital Limited	Other SEC Party	This modification will allow MAPs and manufacturers access to key data which will support our work with suppliers around maximising smart meter health and firmware upgrade processes.	
Northern Powergrid Metering Limited	Other SEC Party	No comment.	
ScottishPower Smart Metering Assets Ltd	N/A	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	
Horizon Energy Infrastructure Limited	Other SEC Party	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	
BUUK	Network Party	No comment.	

Question 10			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	Can the title of this modification be changed to include MAPs and Meter Manufacturers?	SECAS will notify the Proposer of your comments.
SGN Smart	Other SEC Party	This modification will allow MAPs and manufacturers access to data which is not readily available enabling us to monitor our assets.	
ScottishPower Energy Retail	Large Supplier	No comment.	
Landis+Gyr	Other SEC Party	In the impact section it talks about installers who have no interest. I assume this means MAPs.	The Modification Report has been amended following your comments.
E.ON	Large Supplier	This modification will provide MAPs with additional data on our assets, that will support industry understanding and progressing other activities. In many cases these other activities will benefit multiple parties, and indirectly energy consumers.	
Utilita	Large Supplier	We do not approve of the cost recovery aspect of MP181. It is possible MAPs / Manufacturers may not utilise the solution delivered by MP181. If this situation materialised, it is unclear how any initial incurred cost would be recovered from industry; we note DCC intend to begin development immediately following implementation and recover incurred cost through Explicit Charging. However, there is no guarantee that costs could be fully recovered via this route if the solution was never used. It should not be the case paying Parties fund a modification which delivers very limited benefit to those Parties, whilst simultaneously exposing them to the possibility of unrecovered costs.	(Please note that Utilita provided comments outside of the Refinement Consultation response form). SECAS will notify the Proposer of your comments and address them at the Working Group.

Question 10			
Respondent	Category	Comments	SECAS Response
		RE: SEC Objectives, we note proposers' comments regarding SEC Objective A & C and provision of rollout of optimum firmware combinations. We do not believe MP181 facilitates any of the SEC Objectives. Suppliers actively monitor meter firmware and manage their metering estate to ensure it is as required by the Supplier. We therefore see no new or obvious additional benefit being delivered through implementation of MP181.	