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MP160 ‘Certificate Signing Request forecasting’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP160 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
Electricity North West Limited	Network Party	Yes	<p>We agree that the requirement on Users to provide CSR forecasts should be removed, As a DNO we do not create Device certificates only Organisation certificates. Our policy is one certificate per 100k meters. Currently we still have to submit a forecast even though we are forecasting only 1 or 2 requests per year.</p> <p>This proposal will remove an unnecessary administrative burden.</p>	-
Western Power Distribution	Network Party	Yes	-	-

Question 2: Do you agree that the legal text will deliver MP160?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	-
Western Power Distribution	Network Party	No	We believe that it is not noted in SEC that DCC are to provide forecast or variance reports to the panel, if anything is noted in Legal text that states that there is guidance document or methodology that DCC have created	SECAS has requested for further clarification and awaiting a response.

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	-	-
Western Power Distribution	Network Party	Yes	-	-

Question 4: Will there be any impact on your organisation to implement MP160?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	-
Western Power Distribution	Network Party	Yes	We will be impacted as it will remove the obligation on us for submitting CSR forecasts to the DCC.	-

Question 5: Will your organisation incur any costs in implementing MP160?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	No costs	-	-
Western Power Distribution	Network Party	No costs	-	-

Question 6: How long from the point of approval would your organisation need to implement MP160?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	n/a	-	-
Western Power Distribution	Network Party	N/A	-	-

Question 7: Do you believe that MP160 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	-	-
Western Power Distribution	Network Party	Yes	We believe that this modification will better facilitate General SEC objection (a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain and (b) Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP160 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	-	-	-
Western Power Distribution	Network Party	No		-

Question 9: Noting the costs and benefits of this modification, do you believe MP160 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	-
Western Power Distribution	Network Party	Yes	-	-

Question 10: Do you agree that the DCC User Guidance document provides sufficient guidance for Users to deliver MP160?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	-	-
Western Power Distribution	Network Party	Yes	<p>1.1 – We believe is slightly confusing because it states that the SEC sets out an obligation on parties however this won't be the case once it goes live</p> <p>1.2 – We believe 6 months should read six months</p> <p>2.1 - Clarification on revision dates shows 05/04/22 however title page shows 5/5/22</p> <p>3.2 - We believe the email address for DCC Service Desk should be included to submit exception demand figures.</p> <p>3.1 – Pleased to see link to where documents will be published, however feel it would be beneficial to include the path.</p> <p>Inconsistency as Document refers to “CSR Forecast Guidance” however the document is actually called “User Guidance Certificate Signing Request forecast” Please note the footnote says “User Guidance Signing Request Forecasts”</p>	<p>1.1 – This has been removed for clarity.</p> <p>1.2 – Noted and corrected to read ‘six’.</p> <p>2.1 – Noted and corrected to both state 05/05/2022.</p> <p>3.2 – DCC Helpdesk email address (ServiceCentre@smartdcc.co.uk) will be included for clarity.</p> <p>3.1 – This has been updated and included full link path for clarity.</p> <p>SECAS has updated to all occurrences within DCC Document to “User Guidance Certificate Signing Request Forecasts”</p>

Question 11: Please provide any further comments you may have

Question 11			
Respondent	Category	Comments	SECAS Response
Electricity North West Limited	Network Party	-	-
Western Power Distribution	Network Party	-	-