

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

MP096 ‘DNO Power Outage Alerts’ Refinement Consultation responses Annex F

About this document

This document contains the full collated responses received to the MP096 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 / DCC Response
Western Power Distribution	Network Party	No	We agree with the intent of the modification and would agree, except that we have a comment regarding the legal text, please see response to question two.	
ScottishPower Energy Networks	Network Party	No	<p>We agree that changing the SEC to reflect the current performance of the CSPs infrastructure will address the DCC's current non-compliance with the SEC. However, the solution does not address the underlying issue of the poor performance of the POA and PRA delivery overall, or the ongoing discrepancy between performance within North and South regions.</p> <p>While a set target of up to 11 minutes for POA will address DCC non-compliance, it does not provide benefit to SPEN's outage management processes or customer engagement whereby other mechanisms are required to verify outages or where customer contact has already been made in advance of any alert being received from Smart metering devices.</p> <p>We note the intention with the proposed legal text to revert to the 60s target response time for POA and PRA alerts (from a date to be specified) for Central South regions only. This will derive no benefit for customers within the North region and only highlights the performance differences based on service provider where there should be one standard measure regardless. In addition, it is unclear how these future strategic goals for POA/PRA improvement will be formally recorded.</p>	<p>DCC Response:</p> <p>It is proposed that the DCC provides monthly performance reporting which will provide detail of:</p> <ul style="list-style-type: none"> • Alert type • Region • Exclusion Alerts <p>This will be defined in the SEC.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>At the extraordinary DIG meeting on the 18 January 2022, it was agreed with the Proposer that they would further refine their proposed legal text to account for the following DNOs recommendations:</p> <ul style="list-style-type: none"> the DCC would be mandated to provide monthly alert performance data to the DNOs the alert performance targets for Legacy CSP Systems would be split based on the services delivered by the two service providers by technology/region the alert performance targets will be reviewed annually and based on the performance data for a set twelve-month monitoring period (the first monitoring period may be longer) and against a defined methodology. the DCC (based on the performance data collected over 12-15 months monitoring period) would propose new targets for the first year to be included in the refined legal text. the initial performance targets setting would exclude exceptional events alert performance data (such as from Storm Arwen) further refinement would be required on the exclusions list based on the DCC sharing more granular alert data for the next Modification working group the proposed implementation date of June 2022 may be amended to November 2022 if further refinement is required on the exclusions list and reviewing and agreeing the amended performance targets at a March Modification Working Group 	

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Scottish and Southern Electricity Networks	Network Party	No	<p>Whilst we agree with the solution's overall intent, through reviewing the consultation's modification report, there are areas in which we seek further clarification.</p> <p>The DCC intend to exclude a number of alerts from the alert performance reporting which includes Clock drift, Duplicate Alerts, Devices producing abnormal volume of messages, POAs over 5,000 per minute per CSP and PRAs over one message, per second, per channel, for CSP North. As some these alerts relate to smart meter defects that will require future fixes, we would expect to see all alerts included within DCC reporting to provide a long-term reporting solution. We would also expect to see any exclusions proposed, included within the SEC legal text to provide clarity and remove any ambiguity. For CSP exclusions, as CSP modelling was based upon 30,000 impacted properties, we would expect all outage scenarios to be covered within the performance reporting. Further to this, if the exclusions remain within the reporting, understanding the breakdown of how the exclusions would be measured alongside how the numbers excluded would be reported on and how this information is communicated out to industry is crucial.</p> <p>Following on from the point above, we would like to highlight the importance of future proofing the delivery time performance figures decided upon of 11 and 8 minutes as stated in this modification. This will ensure the DCC remain compliant once the smart meter roll-out has finished, and maximum penetration has been reached. We would like to understand the rationale of how the final measurement values, that are slightly higher than the average delivery time were decided upon as this is not clearly detailed within the modification.</p>	<p>DCC response:</p> <p>DCC has proposed two exclusions:</p> <ol style="list-style-type: none"> 1) Duplicated Alerts 2) Abnormal volumes of Alerts as a result of faulty ESMEs which is outside DCC's ability to rectify. <p>DCC will provide definitions of the above.</p> <p>The exclusions will be reported on a monthly basis in the reporting pack, and DNOs are able to challenge any exclusions which they think inappropriate on a case-by-case basis.</p> <p>In regards to separating CSP performance, the DCC is happy to provide performance metrics by</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>We would also like to note that throughout the SEC modification working groups, it has been members views that the delivery times per CSP region should be broken out based on the individual CSP performance levels highlighted. It is clearly stated within the September working group and captured within the meeting minutes “The Working Group did however advise that it would be preferable to not baseline the performance to the lowest common denominator.” We would seek clarification as to how the DCC have analysed and decided against the working groups recommendations and used the lowest common denominator to be included in the legal text. As the new legal text section 3.14A separates two different performance measures between Central/South and North, we would recommend a similar amendment to the legal text. SSEN still recommends for the performance be split by CSP region to ensure the best possible performance is adhered to by each CSP as detailed in the modification report.</p> <p>The modification report states that the DCC will be required to “investigate any instances where the performance does not meet what is stated within the SEC”. This statement doesn’t confirm if this will be reported or communicated to wider industry parties. We would expect that the modification solution should describe how this performance will be summarised for SEC parties as this modification will not impact the outage and restoration reporting related to SEC modification 122B, so we presume we will be unable to monitor ongoing performance. If the modification remains unchanged, as this modification directly impacts DNO’s we would expect to see information around the future governance and communication with SEC parties related to any ongoing process or changes to the reporting.</p>	<p>CSP for each Alert type and that this is reflected in the SEC and the monthly reports. These reports will be made available to all SEC Parties via SharePoint.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Electricity North West Limited	Network Party	No	<p>We do not agree that the solution put forward addresses the ‘issue’ that currently, the DCC does not meet the SEC obligations to send:</p> <ul style="list-style-type: none"> Power Outage Alerts (POAs) to Industry, including DNOs, within 60 seconds after the initial three minutes of the outage. Power Restoration Alert (PRA) to the DNO within 60 seconds once power is restored. <p>The reason the DCC are unable to meet their aforementioned SEC obligations is because the same POA and PRA definitions and requirements are not transposed in their CSP contracts; is it not the ‘issue’.</p> <p>We do not agree with the Proposed Solution based on the legal text accompanying the consultation for the following reasons:</p> <ul style="list-style-type: none"> DNOs operating in the region serviced by Radio will realise negligible benefits from receiving POAs up to 11mins as the majority of our customer will have already contacted us to report a power cut within ten minutes. This will result in little value to customers connected to our network which is solely serviced by Radio, The disparity between the two new performance targets across Communication Service Providers (CSP) and regions. The CSP Central and South (CSP C & S) will provide POA and PRA alerts within 60 seconds, from a date to be defined, whereas CSP North (CSP N) will provide alerts within 11 minutes (POA) and 8 minutes (PRA) as the proposed H3.14A legal text does not apply to Communication Hubs in the region serviced by Radio North region. Consequently, the customers in 	<p>DCC response:</p> <p>In regards to DCC not being able to meet its SEC obligations, DCC presented a cost to align Service Provider contracts to the SEC to the Working Group on 1 September 2021.</p> <p>This was rejected as it did not demonstrate good value-for-money.</p> <p>In terms of the 10 months’ worth of data that the DCC has collected, it is the DCC’s view that current performance reports are better than the proposed targets as the network is not operating at full capacity. Interim annual and monthly targets will be proposed that better</p>

Question 1																
Respondent	Category	Response	Rationale	SECAS / DCC Response												
			<p>regions serviced by 2G Cellular will receive a significantly better enduring service than customers in the region serviced by Radio.</p> <ul style="list-style-type: none">The 10 months' worth of data provides evidence that the baseline performance is better than the proposed targets by a significant and unjustified margin as follows: <table><tr><th>Performance level</th><th>Baseline data</th><th>Proposed target</th><th>Margin</th></tr><tr><td>POA</td><td>3.85-10.09 mins</td><td>11 minutes (for CSP N)</td><td>65 – 8%</td></tr><tr><td>PRA</td><td>0.78-5.55 mins</td><td>8 minutes (for CSP N)</td><td>91 - 31%</td></tr></table> <p>ENWL requests the refinement of the proposed legal text as drafted by Northern Power Grid and attached to this response is taken forward.</p> <p>The DNO proposed legal text has been discussed by all the DNOs who have networks geographically located in the CSP N region.</p> <p>On the 18 January 2022, the DNOs held an extraordinary meeting of the Distribution Issues Group (DIG) with the Proposer, SECAS and BEIS to discuss P096 and the DNOs proposed refined legal text. We consider this meeting to be an effective investigation into alternative solutions. For further details on what was discussed and agreed with the Proposer refer to our responses to Q2 and Q3.</p>	Performance level	Baseline data	Proposed target	Margin	POA	3.85-10.09 mins	11 minutes (for CSP N)	65 – 8%	PRA	0.78-5.55 mins	8 minutes (for CSP N)	91 - 31%	reflect actual performance.
Performance level	Baseline data	Proposed target	Margin													
POA	3.85-10.09 mins	11 minutes (for CSP N)	65 – 8%													
PRA	0.78-5.55 mins	8 minutes (for CSP N)	91 - 31%													

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
UK Power Networks	Network Party	No	<p>The Data Communications Company (DCC) is currently unable to meet the performance requirement for POAs and PRAs as set out in the SEC, primarily because the DCC contracts with their CSPs do not include the same SEC performance standard requirements. Therefore, the intention of the DCC proposal is to address their non-compliance with the current SEC performance standard by updating and significantly weakening the SEC requirements to align with the performance measure of their existing infrastructure i.e. reduce the standard to meet actual performance and not improve performance to meet the designated standard.</p> <p>We do not agree with the solution and the legal text proposed in its current format for addressing this situation because of the following reasons:</p> <ul style="list-style-type: none"> • The delivery times proposed by the DCC of 11 minutes for the POA and 8 minutes for the PRA alerts are higher than the upper value in the dataset presented in this consultation as the baseline data from the DCC analysis of 10-months' of data. • We ask that DCC share the granular data used for their analysis and explain their justification for requiring a longer delivery time for the POAs and PRAs than what is presented as the best and worst performance spread; POAs spans from 3.85 minutes to 10.09 minutes and PRAs the spread is from 0.78 minutes to 5.55 minutes • We also believe the analysis should be carried out with a full 12-months' of data covering the whole range of typical fault scenarios that could occur during this period. 	<p>DCC response:</p> <p>In regards to the legal text recognizing differences across the different design standards of the existing DCC infrastructure, the DCC propose that the SEC refers to technology to distinguish between the variation in performance between regions.</p> <p>For Next Generation Communications Hubs, it is the intention to include a requirement for POAs to be sent within 60 seconds for all new technology – this will be included within future procurement activity for CSP N.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<ul style="list-style-type: none"> The MP096 Legal Text needs to recognise the performance differences across the different design standards of the existing DCC infrastructure and therefore show separate alert delivery timing performance between the CSPs. The Code Performance Measures and Minimum Service Level for delivery of alerts as defined in H13.1 of the proposed Legal Text need to be set to 96% to align with the other Code Performance Measures. The Legal Text needs to make specific reference to, and be applicable to Network Evolution Communication Hubs and future developments for the performance levels for delivery of alerts based on the current SEC standard of 60 seconds. The Legal Text should not specifically define to which CSP this applies as it could restrict future improvements. The proposal needs to specifically refer to all SMETS2 and future meter versions and as such should also include Polyphase meters. The exceptions list should only include items that are outside of the DCC's ability to directly manage to mitigate impact on delivery performance. Those items that DCC is able to performance manage, for example the PRA from the Comms Hub, need to be included within the DCC solution and the MP096 Legal Text to ensure there remains an obligation to ensure compliance by the DCC. 	<p>The DCC agree on making MP096 a SMETS2-only solution.</p> <p>For Polyphase meters, the DCC advises that there are not enough data sets due to the small numbers of polyphase meters to set any performance targets. It is proposed this is reviewed for inclusion 12 months after implementing MP096 and then follow the same reporting process as SMETS2 meters.</p>
Northern Powergrid	Network Party	No	We agree that changing the SEC to reflect the current performance of the CSPs infrastructure will address the DCC's current non-compliance with the SEC. The solution doesn't address the underlying issue of the poor performance of the POA and PRA delivery relative to the current SEC obligation; however we recognise that the costs of changing the infrastructure to comply with the current SEC	<p>DCC response:</p> <p>For DCC developing a methodology so that the performance levels could</p>

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>requirements would be disproportionate to the benefits that could be delivered to consumers. In our view, the proposed solution doesn't address the non-compliance effectively and we have included alternative legal text as part of our consultation response that we believe would address the non-compliance and better facilitate the SEC objectives than the current proposal. We recognise that, following the discussion with DNO's, SECAS, DCC and BEIS on 18 January 2022, DCC took various actions to refine their proposed legal text to take into account some of the concerns expressed by DNOs, and that those changes will address some of the items we sought to address in the attached proposed legal text. Our understanding from the meeting is that:</p> <ol style="list-style-type: none"> 1. DCC would revise their proposed draft legal text to differentiate between the PRA/POA performance in the two CSP regions. 2. In recognition that the performance of the CSP systems will vary over time, and the significant difficulties associated with modelling the change, DCC would develop a methodology so that the performance levels could be reviewed / updated annually based on the previous years measured data with an 'allowance' for the potential annual worsening in performance during the year. 3. DCC would explain the rationale for excluding CH's initiating >40 POA per month and meters initiating >200 PRAs per month, with the intention that these values would also be reviewed annually. 4. DCC would incorporate any exclusions in the SEC legal text. <p>Northern Powergrid is keen to work with all parties to refine the proposed legal text so that it is acceptable to all parties.</p>	<p>be reviewed and updated annually, the DCC is happy to revise the monthly and performance target on an annual basis. This process will be defined and agreed under this modification.</p>

Question 2: Do you agree that the legal text will deliver MP096?

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	No	<p>We do not believe that H3.14(j) is appropriate as we are not convinced that the 8F35s can be measured accurately when generated from a SMETS1 device. This is because for SMETS1, these alerts are non-mandated and therefore there is no requirement that they are generated, or sent, nor how they should be constructed. As a result, we see these alerts generated with no payload and therefore there is no consistent way to measure from the time the alert was generated as there might not be a payload stating the time the alert was generated.</p> <p>We are interested to understand the date that will be put in section H3.14A as we believe that the requirement with regards to the PRAs was removed from the 4G Comms Hub requirements.</p> <p>We would like to understand why the minimum service level under CPM 3A is 95% where the rest are 96%.</p>	<p>DCC response:</p> <p>in relation to setting Code Performance Measure 3A being set to 95%, this was set without acknowledgement that other CPMs were set at 96%. Future reports can be set at 96% if required; however this would mean all reports will need to be run again to allow for comparisons to be made.</p>
ScottishPower Energy Networks	Network Party	No	<p>Whilst we agree and are supportive of there being only one SLA within the SEC, SPEN does not believe this caters for the large differences in performance across regions and applying a lowest common denominator would appear to degrade all services.</p>	<p>Please see the DCC's response to Scottish and Southern Electricity Networks' question 1 comments.</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>There are no details within the consultation document describing the analysis, methodology or conclusions on how the proposed target figures within the legal text have been derived. It is noted that the analysis is ongoing, therefore, are the figures presented still to be finalised within a formal completion report?</p> <p>Under H13.1 we would seek clarification on why the minimum service level under 3A (POA/PRA alerts) is 95% where all others have a 96% measure applied.</p> <p>Noting the outcomes from the extraordinary DIG meeting on the 18 January 2022 (see response to Q1), we would welcome further review of the legal text to accommodate the above.</p>	
Scottish and Southern Electricity Networks	Network Party	No	As noted in question 1, we do not believe that alert exclusions should be included in the reporting and that the legal text should be written to obligate performance measures against individual CSP's and not to the lowest common denominator.	Please see the DCC's response to Scottish and Southern Electricity Networks' question 1 comments.
Electricity North West Limited	Network Party	No (to the legal text which accompanied the consultation)	Please refer to our response to Q1. ENWL requests refinement of the proposal legal text as drafted by Northern Power Grid and attached to this response. The refined legal text proposes separate POA and PRA performance requirements for the region serviced by Radio compared with the regions services by 2G Cellular. The refined legal text proposes performance targets	<p>DCC response:</p> <p>Regarding the DCC being mandated to provide monthly Alert performance data to the DCC, the DCC has stated that it will provide monthly performance reporting which will provide detail of:</p>

Managed by



Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>based on the average of the performance data for the monitoring period for each technology.</p> <p>Currently, the report and drafting of the legal text implies all CSP Providers and regions will be treated on equivalent performance level yet the legal text excludes CSP C & S from the lower performance levels from a specified date. ENWL will also be seeking inclusion of technology based performance targets in the DCC's Operating Performance Regime (OPR).</p> <p>At the extraordinary DIG meeting on the 18 January 2022, it was agreed with the Proposer that they would further refine their proposed legal text to account for the following DNOs recommendations:</p> <ul style="list-style-type: none"> the DCC would be mandated to provide monthly alert performance data to the DNOs the alert performance targets for Legacy CSP Systems would be split based on the services delivered by the two service providers by technology/region the alert performance targets will be reviewed annually and based on the performance data for a set twelve-month monitoring period (the first monitoring period may be longer) and against a defined methodology. 	<ul style="list-style-type: none"> Alert type Region Exclusion Alerts <p>This will be defined in the SEC.</p> <p>DCC agrees with the respondent's recommendation for legacy CSP Alert performance and annual reviewing of targets.</p> <p>DCC also agrees that the targets will exclude exceptional events (such as Storm Arwen).</p> <p>In relation to the proposed implementation approach, DCC believes that targeting the June 2022 SEC Release is achievable, and proposes a methodology that mitigates any risks of implementing MP096 at this time.</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<ul style="list-style-type: none"> the DCC (based on the performance data collected over 12-15 months monitoring period) would propose new targets for the first year to be included in the refined legal text. the initial performance targets setting would exclude exceptional events alert performance data (such as from Storm Arwen) further refinement would be required on the exclusions list based on the DCC sharing more granular alert data for the next Modification working group the proposed implementation date of June 2022 may be amended to November 2022 if further refinement is required on the exclusions list and reviewing and agreeing the amended performance targets at a March Modification Working Group. <p>Whilst not discussed at the DIG meeting, smart meters might in the future make a contribution to managing exceptional events and consideration of this could be part of any annual review.</p>	
UK Power Networks	Network Party	No	We do not believe the legal text in its current format as presented in Appendix D of this Refinement Consultation	Please see the response to Electricity North West Limited above.

Managed by



Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>is suitable for delivering the modification proposal MP096 because of the points we have raised in response to this consultation, in particular questions 1 and 3.</p> <p>At the extraordinary DIG meeting on the 18 January 2022, it was agreed with DCC that they would further refine their proposed legal text to account for the DNO recommendations as below:</p> <ul style="list-style-type: none"> • DCC would be mandated to provide monthly alert performance data to the DNOs; • The alert performance targets for Legacy CSP Systems would be split based on the services delivered by the two service providers by technology/region; • The alert performance targets will be reviewed annually and based on the performance data for a set twelve month monitoring period (the first monitoring period may be longer) and against a defined methodology; • DCC (based on the performance data collected over 12-15 month monitoring period) would propose new targets for the first year to be included in the refined legal text; 	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<ul style="list-style-type: none"> The setting of performance targets would exclude alert performance data for exceptional events (such as from Storm Arwen); Further refinement would be required on the exclusions list based on DCC sharing more granular alert data for the next Modification Working Group; The proposed implementation date of June 2022 may need to be amended to November 2022 as further refinement is required on the exclusions list and to allow time for reviewing and agreeing the amended performance targets at a March Modification Working Group. 	
Northern Powergrid	Network Party	No	<p>We have the following comments to make in relation the proposed legal text, although we recognise in our response to Question 1 that DCC are looking to revise the proposed legal text following feedback from DNOs. The comments below relate to the proposed legal text included in the refinement consultation.</p> <p><i>H3.13 (i): (subject to Section H3.14A) for the Alert 'Power Outage Event (AD1)', sending a User an Alert within 11 minutes measured from the Alert being generated by the Communications Hub Function; or</i></p> <p>1. There is no evidence in the consultation document to demonstrate how this figure of 11 minutes has been</p>	<p>The DCC and SECAS acknowledge your comments and will consider them when drafting the next version of the legal text. Following the scheduled meeting with DNO representatives on 15 February 2022, the DCC and SECAS will re-draft the legal text in line with the agreed approach from the DNOs. This will then be circulated with DNOs, before being discussed at the March 2022 SEC Working Group.</p>

Managed by

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>derived. Earlier in this document there is the text 'Over the ten months' worth of data, the best and worst performance spread for POAs spans from 3.85 minutes to 10.09 minutes. For PRAs the spread is from 0.78 minutes to 5.55 minutes. As such, the DCC is proposing setting the POA target to 11 minutes, and the PRA target to 8 minutes. The performance will be measured from the point in which the Alert volume reaches the 95th percentile'. It is therefore unclear why the proposed POA value is 11 minutes, rather than being less than worst performance of 10.09 minutes. DCC should provide further information to explain how the proposed delivery time of 11 minutes has been derived.</p> <p>2. We understand that the performance analysis is still ongoing and it seems inappropriate to quote a performance value if the process to determine that value is not yet complete.</p> <p>3. It is unclear from the consultation document whether the measured data for the performance of the alerts is the same in the CSPC&S as CSPN. It is our understanding that the difference in the performance of CSPC&S and CSP is significant for POAs but less so for PRAs. Therefore we are of view that SEC H3.13 (i) should include different POA performance requirements for CSPN and CSPC&S.</p>	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>4. The proposed text should refer to Device Alerts or Non-Device alerts to be consistent with H3.13 (g). This would clearly differentiate between the AD1 Power Outage Alerts generated by the communications hub and the 'Supply Interrupted on Phase n' alerts generated by a polyphase ESME and that the delivery time for the latter would need to comply with H3.13 (g).</p> <p><i>H3.13 (j): (subject to Section H3.14A) for the Alerts 'Supply Outage Restored (0x8F35)' and 'Supply Outage Restored – Outage >= 3 minutes (0x8F36)', sending a User an Alert within 8 minutes measured from the Alert being generated by the Electricity Smart Meter.</i></p> <p>1. There is no evidence in the consultation document to demonstrate how this figure of 8 minutes has been derived. Earlier in this document there is the text '<i>Over the ten months' worth of data, the best and worst performance spread for POAs spans from 3.85 minutes to 10.09 minutes. For PRAs the spread is from 0.78 minutes to 5.55 minutes. As such, the DCC is proposing setting the POA target to 11 minutes, and the PRA target to 8 minutes. The performance will be measured from the point in which the Alert volume reaches the 95th percentile</i>'. It is therefore unclear why the proposed POA value is 8 minutes, rather than being less than 5.55 minutes. DCC should provide further information to</p>	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>explain how the proposed delivery time of 8 minutes has been derived.</p> <p>2. We understand that the performance analysis is still ongoing and it seems inappropriate to quote a performance value if the process to determine that value is not yet complete.</p> <p>3. It is unclear from the consultation document whether the measured data for the performance of the alerts is the same in the CSPC&S as CSPN. It is our understanding that the difference in the performance of CSPC&S and CSP is significant for POAs but less so for PRAs. Given the difference in the POA performance and in our view the need for different SEC obligations, we think that there should be separate SEC obligations for PRA's as well. Therefore we are of view that SEC H3.13 (j) should include different PRA performance requirements for CSPN and CSPC&S.</p> <p>4. The proposed text should refer to Device Alerts or Non-Device alerts to be consistent with H3.13 (g).</p> <p>5. We note that the delivery time of the 'Supply Outage Restored' alerts associated with polyphase meters will continue to be included in the scope of H3.13 (g).</p> <p><i>H3.14A: Sections Section H3.14 (i) and (j) shall not apply in relation to Communications Hubs in the Central and South Regions manufactured after [DATE]. For those</i></p>	

Managed by



Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p><i>Communications Hubs, all Alerts will be subject to Section H3.14(g).</i></p> <p>1. There is the duplication of the word 'sections' at the start of the clause.</p> <p>2. Clarification is required as when in the modification process the [DATE] text will be finalised.</p> <p>3. We note that H3.14A will mean that there will be different SEC POA and PRA performance obligations for CSPC&S and CSPN after [DATE], supporting our view that it is reasonable to have different SEC POA and PRA performance obligations for CSPC&S and CSPN before [DATE].</p> <p>4. We note that application of H3.14A would require a more complicated performance analysis as there would be a need to differentiate between the POA/PRA performance associated with Network Evolution Communications Hubs (where H3.14 (g) would apply) and existing Communications Hubs (where H3.14 (i) and H3.14 (j) would apply).</p> <p><i>H3.13B</i></p> <p>We note that there was a paragraph that was included in v0.1 of the proposed legal text which is not included in v0.2. The deleted text relates to the exclusions that DCC can apply when measuring the POA and PRA delivery performance. These exclusions are described in a DCC</p>	

Managed by

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>document 'DCC Performance Measurement Methodology' which does not fall under SEC governance and potentially can be revised without agreement with relevant DCC Service Users. Given the significant discussions relating to PRA and POA over several years, we think that it is appropriate for any alerts that can be excluded from the delivery performance to be transparently documented in the SEC.</p> <p>2. We note that the exceptions are summarised on page 6 of v0.11 of the Modification Report, and we would like to make the following comments on the exclusions:</p> <p>a. Clock Drift. All Communications Hubs and ESMEs will experience some degree of clock drift hence a blanket exclusion of POA and PRAs in relation to clock drift seems inappropriate. Further granularity of this exclusion is required, preferably by including a definition of Clock Drift in the SEC.</p> <p>b. We agree that where there are duplicate alerts, the performance should be based on the first such alert.</p> <p>c. We can see that that special consideration could be given to devices that produce an 'abnormal volume of messages' provided that the volume of messages considered to be abnormal is quantified in a governed document, such as the SEC, and that the messages relate to POA/PRA rather than other messages or alerts.</p>	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>We note that the performance metrics for the other alerts don't have exclusions for chatty devices and hence question why such exclusion is required here.</p> <p>d. We can see that that special consideration could be given to undelivered alerts associated with DCC maintenance outages will need to be excluded, however we note that the performance metrics for the other alerts don't have exclusions for maintenance periods hence question why such exclusion is required here.</p> <p>e. It is not clear to us, given that the proposal is to set the SEC obligation based on the measured performance over several (10) months, that it is reasonable to exclude:</p> <ul style="list-style-type: none"> • POAs are limited to 5,000 per minute per CSP (not region), or • PRAs are limited to one message, per second, per channel, for CSP North, because: <ul style="list-style-type: none"> i. Any events that meet these criteria would be implicitly included in the 10 months measured data; ii. The materiality of these exclusions on the actual performance is unclear – i.e. the proportion of the overall number of alerts that would be exclude is uncertain; and 	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>iii. These values (5000 per minute and one message per second per channel) may change as the CSP infrastructure develops; and as a consequence the exclusion may not be appropriate.</p> <p>Section 1.6.1 Clause 20 of the DCC Performance Measurement Methodology V3.0, states that 'For each Performance Measure the Service Levels' calculations may be subject to Allowed Exceptions as detailed in the DCC Service Provider contracts and as agreed from time to time between the DCC and the DCC Service Provider. It is unclear what exclusions are permitted in the DCC Service Provider contracts, but there is clearly the flexibility for them to be changed without discussions with the relevant DCC Service Users. This seems inappropriate and any permitted exclusions should be transparently documented in the SEC and that DCC should report on the volumes of any alerts not included in the performance metrics.</p> <p>g. The list of exclusions is documented in the DCC Performance Measure Exception List (PMEL). It is unclear if this list has been updated to include the proposed exemptions, nor the extent to which the DNOs can be involved in agreeing this exemptions list; the</p>	

Question 2				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			Modification Report indicates that this list is governed by the SEC panel.	

Question 3: Do you agree with the DCC's proposed exclusions list as captured within the Modification Report and their proposed location within the PMEL?

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	Yes	<p>We agree with the proposed list and that these should sit within the PMEL, however we are keen to see the specific details around how these exclusions are determined, for example, how much clock drift is allowed prior to the exclusion and if the DCC can identify these devices, can/will DNOs be advised so that they can allow for this in their systems?</p> <p>We would also like there to be clear and agreed definitions of 'duplicate' and 'abnormal'.</p>	<p>After further solution development, the DCC have decided that the exclusions list is better placed within the SEC legal text. This will add transparency and mean that any changes to the list will be SEC-governed.</p> <p>In terms of agreed definitions, please see the DCC's response to Scottish and Southern Electricity Networks' question 1 comments.</p>
ScottishPower Energy Networks	Network Party	No	<p>Some of the exclusions relate to defects within Smart meters which will require remediation and will apply to all alerts generated by these devices. We do not believe it is appropriate to single these out for a specific alert type. We do not find this to be a suitable solution and would seek clarification on the rationale supporting including the exclusions in the PMEL and not the SEC. Is the intention to update these exclusions in the future as some will be altered as Smart meter defects are remediated? Would an alteration to the exclusion list impact proposed targets for POA/POA?</p>	<p>DCC response:</p> <p>All exclusions proposed would be included in the reporting pack to provide clarity and remove any ambiguity, and will be reviewed annually within the SEC legal text.</p>

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Scottish and Southern Electricity Networks	Network Party	No	<p>As stated in question 1, as the exclusions relate to defects within smart meters which will require remediation, we do not find this to be a suitable solution. We also feel that including the exclusions in the PMEL and not documenting them into the SEC leads to confusion and ambiguity when reviewing SEC Section H.</p> <p>We would like to seek clarification on the purpose of including the exclusions in the PMEL and not the SEC. Does the DCC envisage removing or amending any of the exclusions in the future?</p>	<p>DCC response:</p> <p>All exclusions proposed would be included in the reporting pack to provide clarity and remove any ambiguity, and will be reviewed annually within the SEC legal text</p>
Electricity North West Limited	Network Party	No	<p>We agree ESME items should be included in the exclusions list as they sit outside the DCCs' control.</p> <p>We do not agree that CSP and Communications Hub items should be included in the exclusions sit as they are within the DCCs' control.</p> <p>Nor do we see any rationale for excluding:</p> <ul style="list-style-type: none"> PRAs are limited to one message, per second, per channel, for CSP North. Without explicitly stating the minimum number of channels as part of the SEC mod then this exclusion could mean that as few as 500 PRA alerts would need to be delivered by DCC to remain within SLA (1 alert per second = 500 seconds = 8.33 minutes. <p>It should further be noted that ESME meters generate two types of PRA alerts:</p>	<p>DCC response:</p> <p>The scope of MP096 is not to make any provision to priorities alerts and therefore this is out of scope.</p>

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>a) Where the outage is < 3 minutes</p> <p>b) Where the outage is > 3 minutes</p> <p>The first can be generated in vast quantities during routine Automatic Restoration of supply. It is the second that is most important to DNO's and as such DCC should examine options for prioritising these alerts over the other.</p> <ul style="list-style-type: none"> POAs are limited to 5,000 per minute per CSP (not region) <p>We will work with the Proposer on further refining the exclusions list at the next Modification Working Group as agreed at the DIG meeting on the 18 January 2022..</p>	
UK Power Networks	Network Party	No	<p>We do not agree with the DCC proposed exclusion list as presented in the Refinement Consultation documents because of the reasons mentioned in Q1 and the points set out below.</p> <p>However, we will work with the DCC to support further refinement of the exclusions list as discussed at the extraordinary meeting on 18 January 2022.</p> <p>Clock Drift</p> <p>The SEC requirements for POAs and PRAs are specified in SEC Section H3.14(g). The requirement currently states that in the case of a power outage, an Alert must be sent to the DNO within 60 seconds (after an initial period of three minutes has passed to allow for the power</p>	<p>DCC agree.</p> <p>In relation to abnormal volume of messages, DCC have proposed two exclusions:</p> <ol style="list-style-type: none"> 1) Duplicated alerts 2) Abnormal volumes of alerts as a result of faulty ESMEs which is outside DCC's ability to rectify. <p>DCC will provide definitions of the above.</p> <p>The exclusions will be reported on a monthly basis in the reporting pack, and DNO's are able to challenge any</p>

Managed by

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>to potentially be restored automatically). When the power is restored, a PRA must also be sent within 60 seconds.</p> <p>POAs and PRAs are sent for an interruption duration of ≤ 3 minutes and for an interruption duration of > 3 minutes. The POA time is taken from the ESME clock and the PRA time is from the Comms Hub clock.</p> <p>We ask that DCC explain the following:</p> <ul style="list-style-type: none"> • Who is responsible for correcting the clock drift from each of these device types i.e. ESME and Comms Hub? • What is the permitted clock drift before corrective action needs to be taken? • Which standards apply to ensuring the clock drift remains within permitted performance criteria? • What are all the other alert and message types reliant on the accuracy of time in the clocks? <p>Duplicate Alerts</p> <p>We are informed that the DCC has the capability to manage these alerts by filtering out duplicate alerts after the first alert has been sent so understand their reason for including these in the exclusion list.</p> <p>Devices producing abnormal volume of messages</p>	<p>exclusions which they think inappropriate on a case-by-case basis.</p> <p>For limiting factors within the DCC System, the DCC has added that the Smart Meter network has capacity limitations that are different for each region due to technology constraints. Further details regarding these limitations are included in the POA/PRA Technical Options Paper. POAs utilise a different system than other Alerts, this is also explained in the DCC technical paper.</p>

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>In reference to “abnormal volume of messages”, how is this defined and how many messages constitutes an abnormal level? In the absence of a clear definition, which we can assess to determine if it is suitable, we are unable to support this exclusion.</p> <p>The DCC proposed solution is to analyse POA and PRA data delivery of their current system to determine POA/PRA alert delivery performance for updating the SEC standard to this measure.</p> <p>We therefore ask the DCC to provide an explanation of the points shown below including how these limits below were determined and how this is related to performance of alert delivery timing in both CSP C&S and CSPN.</p> <p>There are system limiting constraints that impact performance where volume exceeds current capacity. DCC reserve the right to exclude these figures:</p> <ul style="list-style-type: none"> • POAs are limited to 5,000 per minute per CSP (not region) • PRAs are limited to one message, per second, per channel, for CSP North <p>In addition, if DCC are declaring that their system has limiting factors for the delivery of high volumes of data, we wish to understand how they will manage the delivery of high volumes of Energy Consumption and Half-hourly</p>	

Question 3				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			voltage values when we start to collect this information from ESMEs.	
Northern Powergrid	Network Party	No	Please see our response to Question 2.	

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

Question 4				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	Yes	We agree that this should be implemented as soon as possible.	
ScottishPower Energy Networks	Network Party	No	While we agree that a change to the SEC in lieu of any changes that will derive benefit to customers is to be adopted at this stage, we believe that it is important that the SEC legal text is considered to ensure the performance discrepancy between SPEN regions does not endure indefinitely. A later implementation date should be considered to allow for this.	DCC response: In relation to the performance discrepancy, the DCC has stated that this will be accommodated in the SEC as the 60-second obligation will remain a requirement for all future technology advances on current infrastructure.
Scottish and Southern Electricity Networks	Network Party	Yes	At the time of writing this response we are still awaiting a cleansed report from the DCC to be able to understand the reporting accuracy. Once this is received, we will apply best endeavours to clarify the reporting and relay findings back to the DCC. From early interrogation of bulk, unclesed reports there are discrepancies found which we need to clarify with the DCC if they are excluded alerts or missing from our systems or the DCC's. We support the implementation approach but remain cautious that if we are unable to clarify discrepancies with the DCC, we would look to the November 22	DCC response: For unclesed reports, DCC will continue to work with the DNOs to fully understand the reports and any discrepancies between the DCC and the DNO data. DCC remain open to conversation with any DNO to validate the data as per the initial invite at the December 2021 Working Group.

Question 4				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			implementation date to allow sufficient time for this activity.	
Electricity North West Limited	Network Party	Yes	A solution is required. The issue has existed since go live and with the increasing number of smart meters being installed onto the network this issue is becoming more compounded.	
UK Power Networks	Network Party	No	Subject to all issues being addressed that have been raised by UK Power Networks and the other DNOs, we agree that the implementation approach, if it is revised, will draw to a close the long standing issue of the DCC non-compliance with POA/PRA delivery performance based on the current SEC standard.	
Northern Powergrid	Network Party	Partially	We agree that a change to the SEC is the only viable option, however we feel that it is more important to make sure that the SEC legal text is properly considered, particularly in relation to separate performance requirements of CSPC&S and CSPN, rather than aiming for the June 2022 SEC release. The modification does not deliver any benefits for customers and there is the risk that rushing the modification for June 2022 will mean that the opportunity to preserve the current performance in CSPN may be lost.	DCC response: There is no dependency between implementing the modification and the performance/service received from CSP N. DCC will ensure the DNOs are in full agreement with any revised performance targets before the legal text is implemented.

Question 5: Will there be any impact on your organisation to implement MP096?

Question 5				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	Yes	We will be impacted as the service we will be receiving will now be officially stated that it will not be as originally expected under the SEC and therefore our benefits will be impacted and we will need to update our business plans accordingly.	
ScottishPower Energy Networks	Network Party	Yes	As our benefit realisation savings to date are based on alerts being received within 60 seconds, we will need to update our business plans accordingly. We will also need to refine future projects using POA/PRA within this new SLA.	
Scottish and Southern Electricity Networks	Network Party	Yes	Once implemented, the new performance measurements will have a direct impact on our previously stated benefit realisation categories. DNO's Benefit realisation savings were previously based on alerts being received in 60 seconds.	
Electricity North West Limited	Network Party	Yes	We will be impacted as the service we will be receiving will not be the service set out in the original design in the North for receiving alerts within 60 seconds and towards which we have been planning our systems. Our benefits will not be realised in this area for the North and we may need to update our business plans accordingly.	

Question 5				
Respondent	Category	Response	Rationale	SECAS / DCC Response
UK Power Networks	Network Party	Yes	We will be unable to deliver the original benefits realisation to customers that had been assessed on the basis of 60 seconds for the delivery of POAs alerts in accordance with the current SEC standard. We will therefore need to re-evaluate our benefits realisation and accordingly update our business plans to the amended alert delivery performance values.	
Northern Powergrid	Network Party	Yes	We will be unable to deliver the original benefits realisation to customers that had been assessed on the basis of 60 seconds for the delivery of POAs alerts in accordance with the current SEC requirements.	

Question 6: Will your organisation incur any costs in implementing MP096?

Question 6				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	No costs	There will be no direct costs involved with implementing this modification, however our smart metering benefits will be impacted as a result.	
ScottishPower Energy Networks	Network Party	less than 100k	SPEN are developing additional processes within the business to accommodate POA/PRA alerts. Smart metering benefits have not been fully realised in this area.	
Scottish and Southern Electricity Networks	Network Party	No costs	No comment.	
Electricity North West Limited	Network Party	£100k-£250k	We are currently developing ways in which we can use POA and PRA in the business. As the CSP N performance levels being proposed are far removed from the current levels we may incur additional costs in the future to adapt any systems such as call handling (as we no longer realise the benefits of avoided calls).	
UK Power Networks	Network Party	No costs but reduced benefits	Based on our initial views, we will not directly incur costs associated with or need to make changes to our smart meters gateway from the DCC changes. However we are likely to see an adverse impact on our business processes and costs from being unable to	

Question 6				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			deliver the expected benefits such as reduction in OPEX costs and CMLs.	
Northern Powergrid	Network Party	Less than £100k	We are currently developing ways in which we can use POA and PRA in the business, however if the performance of the CSPN falls, as would be permitted by the proposed SEC modification, we may incur additional costs in the future to adapt any systems.	

Question 7: How long from the point of approval would your organisation need to implement MP096?

Question 7				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	N/A	No comment.	
ScottishPower Energy Networks	Network Party	N/A	No comment.	
Scottish and Southern Electricity Networks	Network Party	N/A	No comment.	
Electricity North West Limited	Network Party	None	No comment.	
UK Power Networks	Network Party	N/A	See response to question 6.	
Northern Powergrid	Network Party	N/A	No comment.	

Question 8: Do you believe that MP096 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	Yes	We believe that this modification will better facilitate SEC objectives (b) and (g) as per the modification report.	
ScottishPower Energy Networks	Network Party	Yes	We believe that this modification will better facilitate SEC objectives (b) and (g) as per the modification report.	
Scottish and Southern Electricity Networks	Network Party	Yes	As stated in the modification report, we agree that this modification will better facilitate SEC Objectives (b) and (g).	
Electricity North West Limited	Network Party	No	We do not agree we the following statement made in the Modification Report: that “The Working Group agreed with the DCC’s views on MP096 better facilitating SEC Objectives (b) and (g) and added no further comments. Industry views will be gathered through the Refinement Consultation.” Industry are members of the Working Group and have provided their concerns during a Working Group RFI process and during meetings. In our response to the RFI we stated that Option 2 (the now current proposal being taken forward) did not benefit other SEC Parties or end customers and as such SEC Parties would struggle to rationalise its approval against a SEC general objective. Another respondent to the RFI also stated it	SECAS response: This will be re-worded to state that the Working Group noted the DCC’s views and provided no further comments. The views of respondents to the RFI and Refinement Consultation will be considered by the Authority when deciding on whether the modification will be implemented. Further views on the SEC Objectives will also be given during the Modification Report Consultation and Change Board recommendations.

Question 8				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			was not clear how any the options could better meet the general SEC objectives.	
UK Power Networks	Network Party	No, for the reasons set out below	<p>The Modification Report submitted as part of this consultation mentions views of the proposer (DCC) against the General SEC Objectives which state:</p> <ul style="list-style-type: none"> • The Proposer believes that this modification better facilitates SEC Objective (b)4 as the proposed change to the SEC will bring DCC into compliance and this meet its obligations stemming from the licence conditions. • The Proposer also believes the modification better facilitates SEC Objective (g)5 as the DCC will deliver a consistent and agreed service level to the DNOs whilst in alignment with obligations under the SEC. <p>Whilst we agree with the proposer's views that this modification would better facilitate the General SEC Objectives, this would only be on the basis that performance targets will be changed to enable compliance with SEC. We believe this is the wrong way round and actual performance should be improved to match the requirements specified in the SEC.</p> <p>The Modification Report also mentions views against the Consumer Areas which states:</p>	

Question 8				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>Improved quality of service – This modification will have a positive impact on quality of service as the DCC will closely monitor the performance of POAs and PRAs to ensure compliance.</p> <p>We do not agree that quality of service will be improved to consumers because there will be no improvement to the delivery times of the POAs and PRAs and the current poor performance would in fact be legitimised by the change. This modification simply changes the DCC performance targets to be close to the performance measures of the existing DCC infrastructure.</p>	
Northern Powergrid	Network Party	See below.	<p>Our view on whether MP096 better facilitates the General SEC Objectives are set out below:</p> <p>(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. Negative. The proposed SEC legal text could allow the POA/PRA performance in CSPN to worsen over time (relative to its current performance) reducing the benefits to consumers in the CSPN region.</p> <p>(b) the second General SEC Objective is to enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications</p>	

Question 8				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<p>Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence. Positive. Changing the SEC to align with the DCCs capability should mean that they can be licence compliant.</p> <p>(c) the third General SEC Objective is to facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems. Neutral</p> <p>(d) the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy. Neutral</p> <p>(e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy; Neutral.</p> <p>(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code. Neutral.</p> <p>(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code. Neutral.</p>	

Managed by

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP096 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	Yes	As there are no system changes there are no direct impact to consumers, however the realisation of benefits will be impacted with DNOs not able to offer benefits in the way that we had originally anticipated.	
ScottishPower Energy Networks	Network Party	No	There are no service performance gains proposed by this change, therefore no benefits to consumers to be derived.	
Scottish and Southern Electricity Networks	Network Party	Yes	We believe that there will be a direct impact on the benefits provided to customers as they will not receive the original envisaged service detailed in the original SEC legal text of 60 seconds.	
Electricity North West Limited	Network Party	Yes	<p>Please refer to our response to Question 1.</p> <ul style="list-style-type: none"> DNOs operating in the North will realise negligible benefit from receiving POAs up to 11mins from the CSP N as the majority of our customer will have already contacted us to report a power cut within ten minutes. This will result in little value to customers. connected to our network which is solely serviced by Radio, 	

Question 9				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			<ul style="list-style-type: none"> The disparity between the two new performance targets across CSPs and regions. The CSP C & S will provide POA and PRA alerts with 60 seconds from a date to be defined. Whereas CSP N will provide alerts within 11 minutes (POA) and 8 minutes (PRA) as the proposed H3.14A legal text does not apply to Communication Hubs in the region serviced by Radio. Consequently, the customers in the regions serviced by 2G Cellular will receive a significantly better enduring service than customers in the region serviced by Radio. 	
UK Power Networks	Network Party	No positive impacts or benefits	There will be no direct impact to customers from the implementation of MP096 but as stated in response to questions 5 and 6 there will likely be a direct impact on the benefits that we had planned to deliver to our customers.	
Northern Powergrid	Network Party	Yes	The proposed solution delivers no benefits to Northern Powergrid nor our customers and we will not be able to deliver all the power outage related smart meter benefits previously expected. Furthermore, as drafted, the SEC would permit the POA delivery performance for the CSPN to worsen from its present level to that currently delivered by the CSPC&S solution which we believe is totally unacceptable; we are keen to work with DCC, SECAS	

Question 9				
Respondent	Category	Response	Rationale	SECAS / DCC Response
			and BEIS to develop legal text that preserves the current performance of the CSPN solution.	

Question 10: Noting the costs and benefits of this modification, do you believe MP096 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS / DCC Response
Western Power Distribution	Network Party	No	We have only said no due to our comments under question two that we feel need addressing before approval.	
ScottishPower Energy Networks	Network Party	No	As indicated above we do not believe this modification should be approved in its current form.	
Scottish and Southern Electricity Networks	Network Party	No	Noting the points raised in questions 1,2, 3 and 4, we do not believe this modification should be approved in its current form.	
Electricity North West Limited	Network Party	No to the proposed solution and legal text. Yes (subject to proposed further refinement)	No to the proposed solution and legal text. Yes (subject to the attached DNO proposed refined legal text being accepted and inclusion of further refinement agreed at the DIG meeting and referred to in our response to Q2) Please refer to our responses to Q1 and Q2.	

Question 10				
Respondent	Category	Response	Rationale	SECAS / DCC Response
UK Power Networks	Network Party	No	We believe that valid concerns have been raised by UK Power Networks and the other DNOs in our response to this Refinement Consultation. If all queries and concerns can be addressed then we are more likely to be able to provide a positive response to the approval of a revised MP096.	
Northern Powergrid	Network Party	No	As indicated in our response to question 9 we do not believe that the proposed legal text for SECMP096 should be approved as it would permit the POA delivery performance for the CSPN to worsen from its present level to that currently delivered by the CSPC&S solution. In our response to question 1 we refer to proposed some alternative legal text that helps to address some concerns associated with the proposed legal text, but we note that further work is refine this.	

Question 11: Please provide any further comments you may have

Question 11			
Respondent	Category	Comments	SECAS / DCC Response
Western Power Distribution	Network Party	<p>Whilst we agree and are supportive of there only being one SLA within the SEC, we seek assurance that the DCC will monitor on a CSP level to ensure that if a provider is currently able to perform better than this SLA that they don't slip due to the SLA allowing a longer delivery time.</p> <p>We are also keen to know when the PMM and PMR will be updated as we have requested this regularly throughout the modification process and have yet to see any draft documentation.</p> <p>We also note that no separate consideration has been given to polyphase meter alerts and therefore expect these alerts to fall into the SEC requirement of 60 seconds.</p>	<p>DCC response:</p> <p>In relation to the PMM and PMR, the DCC's POA/PRA report will be an additional report and none of the other PMM reporting will change.</p>
ScottishPower Energy Networks	Network Party	<p>SPEN remain concerned that a change to the SEC sets an expectation of an enduring sub-par POA/PRA solution. We would like to see greater clarity on the strategic intent to improve the solution in the long term.</p>	
Scottish and Southern Electricity Networks	Network Party	<p>As documented throughout our response, we believe there is further work required to ensure this solution is ready for implementation.</p> <p>Noting the timeframe of the DCC's non-compliance with the SEC and the implementation approach, we welcome further collaboration with the DCC to ensure that the performance reporting, legal text and alert exclusions are embellished further to ensure a robust and future proof solution is implemented.</p>	

Question 11			
Respondent	Category	Comments	SECAS / DCC Response
Electricity North West Limited	Network Party	<p>Yes. We have the following observations:</p> <ul style="list-style-type: none"> we welcome SECAS agreement and notification to us on the 8 December 2021 for an extension to the deadline for responses to this consultation from 7 January 2022 to the 21 January 2022. The CSP performance levels should be included with in the DCCs Operating Performance Regime as an area which has consistently underperformed in multiple DCC price controls and which continues to present opportunities for further erosion of CSP performance levels and increase the disparity gap between the service customers receive in the region serviced by Radio compared to service received in the regions serviced by 2G Cellular. This modification is silent on polyphase meter alerts and therefore we expect these alerts to fall into the SEC requirement. This modification is silent on the treatment of SMETS1 meter alerts and therefore we would request clarity on this area during the next stage of refinement. <p>The DIG meeting on the 18 January 2022 did not discuss these ENWL observations we would like them to be considered during the next stage of refinement.</p>	<p>DCC response:</p> <p>in relation to the OPR, DCC advises that Alert management is not currently included, nor does MP096 make provision for this to change. This would need to be addressed separately.</p> <p>For the comment regarding SMETS1, DCC advise that SMETS1 meters do not send POAs/PRAs and are therefore excluded from this performance measure.</p>
UK Power Networks	Network Party	We thank SECAS for the extension of submission date from 7 January 2022 to 21 January 2022, recognising that the seasonal break during	

Question 11			
Respondent	Category	Comments	SECAS / DCC Response
		<p>this period would have presented difficulties in meeting the original submission date.</p> <p>In addition we thank the proposer for also recognising that during the extraordinary meeting on 18 January 2022, the timelines for the review of this Refinement Consultation may need to be changed to allow sufficient time for all issues highlighted to be further discussed and addressed.</p> <p>We also support the Legal Text document being proposed by Northern Power Grid as a refinement to the original Legal Text presented in the consultation that will be reviewed during the next Working Group meetings.</p>	
Northern Powergrid	Network Party	<p>We provided many comments on the DCC proposal as part of the Request For Information process, and it is disappointing that the Refinement Consultation document still doesn't not properly articulate the benefits associated with the DCC's initial Proposed Solution on page 12.</p>	<p>SECAS response:</p> <p>The Proposer decided to withdraw the proposed system enhancements (titled Options 3A and 3B) following review of the Refinement Consultation responses. The majority of respondents felt that this solution did not have a sufficient business case, given the costs involved. SECAS would be happy to discuss this further with the respondent, and how this could be better incorporated into the Modification Report.</p> <p>DCC response:</p>

Question 11			
Respondent	Category	Comments	SECAS / DCC Response
			The DCC are happy to provide performance metrics by CSP for each alert type and that this is reflected in the SEC and the monthly reports.