

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.

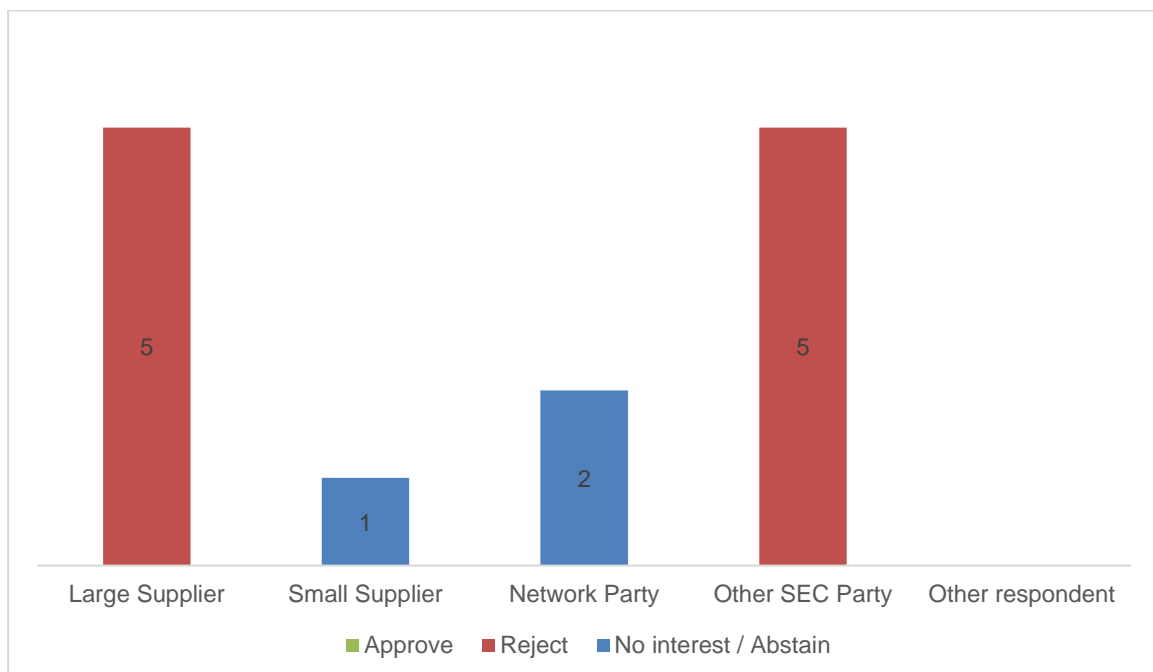
MP162 ‘SEC changes required to deliver MHHS’

Modification Report Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP162 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP162 should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Reject	<p>We are in full support of the MHHS Programme. We fully understand the need to open up the Smart solution to allow for a new MDR Role to be able to pull Settlement only data and also enhancing the DCC's ability to handle the demand challenges MHHS will present. We feel the issues discussed at length during the development and refinement of the Modification have not moved forward enough for us to approve this Modification.</p> <p>We support the Scheduling Windows as the operation of Settlement should not directly impact all the other Services the DCC provides. We are already seeing issues of load on the network affecting Install and Commission and the management of prepayment top ups.</p> <p>We would also challenge the view that MDRs do not need to undergo Privacy Assessments as it has been made clear in the MHHS Programme meetings that MDRs are looking to use the data for purposes other than Settlements. Being this data is covered under the Privacy rules under both the SEC and the Licence, beholden to the Supplier, that means MDRs scope is greater than that which was reviewed when it was decided to not require</p>	<p>The SEC Panel reviewed the need for Privacy Assessments with the User Independent Privacy Auditor (IPA) and was satisfied that these would not be required as MDRs would be collecting the data on behalf of Suppliers. We have spoken with the MHHS Programme and understand that for MHHS implementation the MDR role will exist only to collect data for settlement. Should the role expand in the future, the SEC arrangements would need to be reviewed considering that. We have asked the MHHS Programme to make fully clear the intended purpose of the MDR role both for MHHS go-live and beyond.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>any assessment. That would be a change to the scope of this Modification as called out in the MRC.</p> <p>Lastly, and most importantly, the matter of cost allocation and the method with which the charges are being made via the SEC, with the recovery by the DCC using Fixed Charges, is unacceptable and will be passing costs onto Parties who have already paid for such functionality. £10M for a function that Suppliers can carry out today, under Elective, is something that needs looking at, as is the monthly Support costs that will only be paid by Suppliers through the Explicit Charges.</p> <p>The Supplier benefits provided by this Mod do not equate to the costs we have to pay, as such we're not able to approve the Mod as it currently stands.</p>	
Electricity North West Limited	Network Party	Abstain	<p>We agree the solution will resolve the identified narrow scope of this proposal in terms of providing a mechanism for allowing third party 'Meter Data Retrieval Agents (MDRAs)' – a new role created through the Market Wide Half Hourly Settlement (MHHS) design to be able to access smart meters and collect half hourly consumption data for settlement purposes.</p> <p>However, we have the following concerns regarding the proposed solution:</p> <ul style="list-style-type: none"> <u>this solution does not consider the whole system impact of multiple SEC Users attempting to</u> 	<p>MP162 was raised to implement changes needed for market-wide half-hourly settlement (MHHS), and as part of this the DCC has considered the additional capacity that would be needed to account for the extra traffic this will generate. The DCC has previously highlighted that the wider capacity impacts are out of scope of MP162 and are being considered separately by the DCC Demand Management team. The DCC SEC</p>

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p><u>retrieve Half Hour consumption data from smart meters</u> - as per our previous responses to the first, second and third consultations. The MP162 Modification Report accompanying this consultation acknowledges that the DCC expects a significant increase in the amount of traffic on the DCC Systems because of the MHHS solution. Our concern remains that this increased volume of traffic will cause further service degradation in Communication Service Provider (CSP) service performance for SEC Users. The MP096 'DNO Power Outage Alerts' latest modification report acknowledges there are known constraints on the SMETS2 network for the CSP North as it utilises long-range radio technology which has a narrow band with. Consequently, performance is impacted by the volume of commissioned ESME and that during an outage event, the common radio channel used by Communications Hubs can become saturated. It also states that the DCC Network Evolution Programme (NEP) would only offer significant improvements to the South and Central CSP regions serviced by cellular technology. We note that in the third response consultation SECAS respond to our and another Electricity Network Operators concerns as follows</p>	<p>Modification Design team has been proactive in the capacity planning working with other programmes to ensure there is no duplication of work or costs.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>“that there are other programmes tasked with reviewing the CSP North network, and the DCC Demand Management team is responsible for current and future network performance overall. The DCC SEC Modification Design Team has been proactive in the capacity planning working with other programmes within the DCC and the Demand Management team to ensure there is no duplication of work or costs. We also note that in the latest Modification Report states that the DCC acknowledged that there are wider use cases that will impact on capacity but highlighted that these are outside the scope of MP162, and it only assessed the capacity needs for MHHS under this modification. The report also states that the DCC has commenced a wider piece of work looking at holistic capacity needs.</p> <ul style="list-style-type: none"> • <u>other SEC party categories have raised additional concerns beyond those raised by Network Parties.</u> <p>In light of, the MHHS programme design having recently been re-baselined, we believe this presents an opportunity for the proposer to take the modification -back to the refinement stage. During refinement the scope of the solution should be widened to address the concerns of Network Parties regarding holistic capacity needs. The</p>	

Managed by



Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>view from the DCC that - the wider user cases that will impact on capacity is outside of scope of MP162 - would appear to go against the first General SEC Objective (which is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain).</p> <p>The Modification report states that a Working group member and TABASC members also queried whether there is value in reconsidering the end-to-end architecture considering future capacity expectations. We would welcome and would support industry wide collaboration with the DCC, Ofgem and BEIS regarding the widening of the scope of MP162 to consider whole system capacity issues. We would recommend that the DCC Demand Management team working on whole system capacity issues liaise closely with the DCC SEC Modification Design Team working on this modification and any other SEC changes required to deliver the MHHS solution.</p>	
E.ON	Large Supplier	Reject	<p>E.ON is absolutely committed to the delivery of MHHS and the benefits it will bring but we do not support the implementation of this modification.</p> <p>We do not believe the solution delivers any of the objectives outlined in the modification report because the addition of the MRA is not necessary.</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>The MHHS TOM only requires a Meter data retrieval service, it does not specifically require a new MDR role. Suppliers already have access to (and have paid for) the required Service Requests to access and retrieve HH data and could effectively appoint agents to run those without the need for the MRA role.</p> <p>The only way we would support the creation of the MDA role is for the Supplier Agents who will benefit from it to pay for the related costs of setting up this new role and the related running/support costs. As it stands, all DCC costs relating to MHHS will be recovered via the DCC fixed charges which are only paid for by Suppliers.</p> <p>The modification report states that consumers are not expected to be directly impacted by this modification and whilst this may be true, they would be indirectly affected by increased pass-through costs from the suppliers who fund it, therefore the benefits of MHHS will be eroded.</p>	
EDF	Large Supplier	Reject	<p>Our view is that this Modification should either be rejected, or a decision deferred at this stage.</p> <p>It is not clear that the solution as it stands would better facilitate any of the SEC objectives, or the delivery of the benefits of Market-wide Half Hourly Settlement (MHHS).</p>	
Siemens	Other SEC Party	Reject	Siemens believes that this consultation to approve MP162 is premature given the acknowledgement by the DAG,	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>PSG, and IPA that there are significant competition issues with the current proposal despite the DAG design principle of a fair and level playing field for all parties.</p> <p>Siemens will not approve any change that seeks to limit the competitive nature of the market; therefore, given that MP162 introduces competition issues, we cannot support it. We do not believe that we need to restate the issues here given the almost universal acknowledgement that this does not follow the design principle of providing a fair and level playing field for all parties.</p> <p>We do however strongly support the introduction of an MDR role so long as it does not introduce competition issues like the suggested implementation would create.</p>	
Utilita Energy Limited	Large Supplier	Reject	<p>Utilita believe this modification should be rejected due to the significant implementation cost and the inequitable manner in which it would be recovered from Parties. The existing methodology sees specific DCC Users pay for alternative data collection capabilities they do not require, as they can already achieve the outcome through other commands. Instead, it forces them to fund new capabilities for other Parties, which may be underutilised relative to the cost of the modification.</p> <p>The current energy and cost of living crisis reinforces the need to ensure all costs are scrutinised and fully justifiable, supported with a solid business case, and</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>equitably incurred. We do not believe this to be the case with MP162.</p> <p>Utilita acknowledge the Ofgem TOM requirements regarding third party access to half hourly consumption data. We do not believe that the presence of external projects and requirement baselining are sufficient to justify the imposition of these costs on organisations who will not use the functionality.</p> <p>Utilita believe the majority of Suppliers will not use the MDR service and therefore this modification offers them no benefit. The beneficiaries of this modification are mainly MDR Users. Cost recovery is not reflective of this.</p> <p>It is not acceptable that MHHS programme deadlines and DCC required lead time dictate this modifications progression and leave insufficient time to investigate any alternate cost recovery mechanism.</p>	
SSE Energy Supply Ltd (SSE Energy Solutions)	Small Supplier	Abstain	<p>We have concerns regarding any proposals that relate to MHHS, including MP162, which are raised within any Industry Code, but are outside of the MHHS Programme. There is a significant risk that should changes be raised and reviewed in isolation of the Programme that the intent of the proposals will be changed dependent on the audience that reviews them.</p> <p>The MHHS Programme should develop proposals against its agreed plan to ensure that at the point of consequential</p>	We will highlight this view with the MHHS Programme and Ofgem for consideration.

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>industry code changes, there will be minimal amendments required to implement them. This change currently being proposed has been raised against the current timelines, with the assumption that the MHHS Programme will not be subject to a significant replanning exercise, which will occur by the end of the year.</p> <p>We do not believe that any changes required should be completed outside of the MHHS Programme governance and believe that these should be held until a decision has been made as to whether there is likely be a delay. Any changes of the nature being proposed in MP162 should be included within the MHHS Programme and its replanning exercise.</p>	
Stark	Other SEC Party	Reject	<p>1. A requirement of the MHHS TOM is that there is competition in data collection (encompassing retrieval and processing) across all segments (Smart, Advanced and Unmetered). Effective competition entails that no party has an unfair competitive advantage over another.</p> <p>2. A design principle of the MHHS Programme is that, “all market participants, operating under the MHHS TOM, will be afforded the ability to deliver the same level of service for the same MHHS service”.</p> <p>We agree that there needs to be a SEC Modification to introduce the MDR role, which is a requirement of the MHHS TOM. However, the solution described in MP162</p>	<p>The MHHS TOM sets out an overarching 24 hour TRT for settlement data, and the DCC has set out an approach to meet this while minimising cost and impact on existing DCC Users. We acknowledge the ongoing discussions on this matter by the DAG, and will take forward any further requirements that arise from its conclusions in this matter.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>fails on both the points above. The MDR role will receive responses to scheduled requests 10-20 hours later than the IS role, dependent on CSP region. This creates a significant advantage for suppliers using in-house capability over those that might use an independent MDR. Those using in-house capability will have more time to process data and more time to retry data retrieval should the schedule fail ahead of the first settlement run, resulting in a lower cost to serve overall and unfair advantages around performance management. Similarly, they can benefit from earlier access to that data – for instance for forecasting and in-day trading. This is clearly anti-competitive and contradicts the MHHS Programme's design principles, Ofgem's responsibility to enable competition and SEC objective (d), "to facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy".</p> <p>For us to support MP162, the level-playing field issues under consideration by the MHHS Programme need to be resolved and the solution amended to support equal access to consumption data for the MDR and Supplier.</p>	
SMS Plc	Other SEC Party		<i>Confidential response provided</i>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Abstain	<p>The proposed solution, as states on page six of the Modification Report, states:</p> <p><i>'The MP162 solution will cover the changes needed under the SEC and the DCC Systems for the new User Role needed for MHHS. This will include:</i></p> <ul style="list-style-type: none"> <i>The introduction of a new User Role for Parties carrying out the MDR service.</i> <i>The User Entry Process requirements for the new User Role.</i> <i>Defining the relevant Service Requests the new User Role will have access to and the associated TRTs and testing scenarios.</i> <i>The associated security and data privacy arrangements that will apply to the new User Role.</i> <p>We believe that the intent of this modification and this narrow solution to purely create a new User Role, would better facilitate SEC Objectives (b) and (c).</p> <p>However, we feel that there are still some answered questions with regards to this modification. One of these questions relates to the MHHS Programme Level Playing Field Design Principle and a potential impact to competition in the market which might result in this</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>modification having a detrimental impact to SEC Objective (d).</p> <p>As a result we do not feel we can approve this modification in its current state.</p>	
TMA Data Management Ltd	Other SEC Party	Reject	<p>1. Data collection within the MHHS TOM requires there to be competition in data collection where no party should have an unfair competitive advantage over another party, this relates to all segments (Smart, Advanced and Unmetered).</p> <p>2. A design principle of the MHHS Programme is that, “all market participants, operating under the MHHS TOM, will be afforded the ability to deliver the same level of service for the same MHHS service”.</p> <p>We agree that there needs to be a SEC Modification to introduce the MDR role, which is a requirement of the MHHS TOM. However, the solution described in MP162 is not fit for purpose and fails on both the points noted above.</p> <p>The MDR role will receive responses to scheduled requests around 10-20 hours later than the IS role, this would provide a significant advantage for suppliers using in-house capability over those that might use an independent MDR, thus resulting in those using in-house capability will have more time to process data and time to retry data retrieval should the schedule fail ahead of the</p>	Please see the response to Stark above.

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>first settlement run, resulting in a lower cost overall and unfair advantages around performance management as well as early access to forecasting and in-day trading data against those using an independent MDR.</p> <p>This is not competitive and goes against the MHHS Programme's design principles as well as Ofgem's responsibility to enable competition.</p> <p>For us to support MP162 equal access to consumption data for the MDR and Supplier need to be resolved so all parties are on equal footing.</p>	
Energy Assets Group	Other SEC Party	Reject	<p>Energy Assets believes that this consultation to approve MP162 is premature given the acknowledgement by the Programme's DAG, PSG, and IPA that there are significant competition issues with the current proposal despite the DAG design principle of a fair and level playing field for all parties to deliver the same services.</p> <p>Energy Assets will not approve any change that seeks to limit the competitive nature of the market; therefore, given that MP162 introduces competition issues, we cannot support it. We do not believe that we need to restate the issues here given the almost universal acknowledgement that this does not follow the design principle of providing a fair and level playing field for all parties to provide the same service.</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			We do however strongly support the introduction of a Meter Data Retrieval role so long as it does not introduce competition issues like the suggested implementation would create.	
British Gas	Large Supplier	Reject	<p>We do not believe that MP162 should be approved, because of (1) its cost, and (2) the risk to the DCC System service delivery.</p> <p>With regard to the General SEC objectives, we note the following:</p> <p>The Mod Report proposes that MP162 is beneficial to General SEC objectives (b), (c) and (g). We do not agree.</p> <ul style="list-style-type: none"> We disagree with it benefitting General SEC objective (b). Whilst it implements the changes needed for the DCC to comply with the requirement in its licence to facilitate the implementation of MHHS, it puts other DCC obligations at delivery risk. We disagree with it benefitting General SEC objective (c). MHHS as a whole is expected to benefit consumers, but we do not see any benefit specifically linked to the elements being proposed in MP162, and the introduction of this new User Role. We already have access to the DCC data we need as a Supplier, and do not agree with the cost of delivering MP162 being incurred by 	

Managed by

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Suppliers, and therefore passed through to consumers. We also note that the data that MDRAs will have access to is for Settlement purposes only, and can not be used for the purposes described in General SEC objective (c).</p> <ul style="list-style-type: none"> We disagree with it benefitting General SEC objective (g). While MP162 would enable this aspect of the MHHS TOM to be delivered as planned, we believe it will put other obligations at delivery risk. <p>Furthermore,</p> <p>We consider MP162 detrimental to General SEC objectives (a) and (b), and potentially (f).</p> <ul style="list-style-type: none"> MP162 puts General SEC objective (a) at risk, if the overloading of the DCC means that we can not meet current customer commitments, particularly with installing new smart meters in the field, and the real-time troubleshooting of any smart meter operational issues. MP162 puts General SEC objective (b) at risk, if implementation of MP162 means DCC can not meet the capacity requirements needed to comply at all times with the DCC's other obligations. 	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<ul style="list-style-type: none"> We are concerned about the lack of Privacy Assessments for the new MDRAs, and consider this may be detrimental to General SEC objective (f). This depends on the exact business models developed by the new parties. 	
IMServ Europe Ltd	Other SEC Party	Reject	<p>MP162, in its current form, should be rejected due to level playing field issues which have been raised during the consultation process, but largely ignored.</p> <p>SEC objective 4, “to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy” is not met, and in fact, implementing MP162 as proposed is detrimental to this objective, as well as against the MHHS programme’s level playing field rules.</p> <p>The peak/off-peak delivery window aspects of the MP162 solution will create a skewed playing field towards energy suppliers using their DCC connected to collect half-hourly data in-house vs those energy suppliers using an independent MDR to collect the data. Having early access to half-hourly data is advantageous to many current and future supplier processes and in particular in-day forecasting and trading. Those suppliers collecting the data in house will have an advantage over those who do not, clearly breaking with SEC objective 4.</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			The concept of peak/off-peak windows is being introduced for the sake of efficiency. However, our view is the commercial disadvantage of collecting data later in the day is so strong that it will lead to all suppliers collecting data in house, which in turn will lead to all data being collected in the same peaky window. This completely undermines the argument for introducing the windows in the first place, and therefore the solution will fail to deliver the first and second SEC objectives due to inefficiency.	

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
OVO Energy	Large Supplier	<p>We are also aware further changes may arise as it is felt the way Smart has been designed does not allow for all the functions the MDRs require. So we're expecting further costs to arise and, if there is no changes made to the Charging model, to be passed on to Supplier to pay.</p> <p>We have repeatedly called out for greater transparency of the cost allocation for this work and a understanding of where an agreement was reached that Suppliers would foot the bill for another party to carry out the functions a Supplier can do already in the name of competition and fairness. The Smart Metering System, under the SEC, was never designed to enable competition when it comes to the Settlement data provision or the operation of Smart meters via the DCC.</p>	
Electricity North West Limited	Network Party	-	
E.ON	Large Supplier	-	
EDF	Large Supplier	While we do not have any material issues regarding the technical solution set out in the Modification Report, which minimises the impact on the way suppliers currently use the DCC systems, we remain concerned about costs of these changes and how they will be allocated.	

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>The current SEC Charging Methodology means that the costs of this Modification will be shared across all Supplier Parties, even though many of those suppliers may not use or benefit from the changes to introduce the Meter Data Retrieval Agent (MDRA) role. Not only are there no direct benefits to suppliers that are not planning to use a third MDRA, it is not evident that incurring the costs of introducing this role will have a wider benefit to the MHHS programme, and the accuracy of the settlement process.</p> <p>We do not disagree with the introduction of the MDRA role as part of the MHHS design, however any changes required to implement and facilitate this role should be undertaken on a 'user pays' basis, with the costs being borne by those parties that will benefit from the changes.</p> <p>We are also concerned that this change is being progressed too quickly, and ahead of the MHHS design being baselined, increasing the risk that further changes will be required later, increasing the overall cost of delivering a solution to support MHHS. While the Modification Report recognises this risk, it does not recognise it as a material issue – however for suppliers that are dealing with extremely challenging market conditions and multiple competing priorities, this is risk that we can't afford to take.</p>	
Siemens	Other SEC Party	SEC objective (d) states: "Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy". We do not believe that SEC is meeting this objective with the proposed solution.	

Question 2			
Respondent	Category	Comments	SECAS Response
Utilita Energy Limited	Large Supplier	-	
SSE Energy Supply Ltd (SSE Energy Solutions)	Small Supplier	-	
Stark	Other SEC Party	Page 4 of the Modification report states that “the SMIP envisioned Suppliers being the only organisations accessing and collecting data from smart meters”. This is incorrect. The SMIP envisioned multiple parties being able to access data from Smart meters, namely Distribution Network Operators and Other Users. Many of the benefits of the SMIP come from parties other than the supplier being able to access consumption data. The thinking that only suppliers should be able to, or were ever intended to, access data from smart meters is unhelpful and constrains innovation.	We acknowledge this inaccuracy in the report and the clarification provided by the respondent.
SMS Plc	Other SEC Party	-	
Western Power Distribution	Network Party	<p>We feel that this modification is unclear on what the issue and solution is specifically trying to address. As per the comment under question 1, it suggests that the solution is to create the role and functionality for a new User Role, the MDR.</p> <p>However, as you get further into the modification, the details included suggest that this modification is also looking to address full use of this new functionality, including how the DCC will handle the increase in</p>	We are in close contact with the REC Code Manager and the DCC over the progression and development of R0044, to ensure this can be delivered in advance of MP162 as required by the DCC to fully deliver the solution.

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>traffic across its network, with page 19 stating, 'The DCC therefore considers it appropriate that its capacity is increased to cater for this additional, mandated, demand.'</p> <p>We also have concerns regarding the fact that the solution relies on the DCC having details of the MDR to validate against. We note that this is being covered under REC Change R0044, however, we have written to REC today as we have concerns that there has been no contact made to us as an ERDA regarding this. As a result we currently do not understand the full end to end process. Also, this modification cannot be implemented prior to the REC change and as we don't yet know what the solution is for R0044, we do not know what lead times might be required.</p> <p>We note that all the relevant SRVs for settlement are expected to be sent via a DSP schedule with a 24hr TRT. Our view is that this would then be for the DCC to manage the requests and load on the network, as is the intention of a DSP schedule and 24hr TRT. The DCC have suggested that there is the creation of 'peak' and 'off peak' windows for requesting this data, although this is not included within any legal text, purely the FIA and technical solution. Timing around sending of these SRVs is in the gift of the DCC, however, by explicitly calling out two windows and which User Roles and SRVs get actioned in each, raises a question around the MHHS Programme Level Playing Field Design Principle and also competition between parties. We appreciate that the DCC have provided this detail in response to a challenge from the work group highlighting that receiving reads later in the day, might cause suppliers issues with other processes such as Install and Commission.</p>	

Managed by



Question 2			
Respondent	Category	Comments	SECAS Response
		<p>Whilst we understand this view, we question whether this is a valid argument, as just because reads are being supplied quicker at the moment, the TRT is 24hrs and therefore there should be an understanding that this could be the case and processes designed accordingly. Install and Commission is also mentioned, however the Smart Meter rollout has an end date of 2025, which is when MHHS is due to go live.</p> <p>The Modification Report also details that the DCC has introduced the concept of 'northbound prioritisation', and whilst this might seem appropriate, we question if this potentially adds delays to requests in the 'off peak' window, does this also further challenge the MHHS Programme Level Playing Field Design Principle and the ability to compete between parties. As you will be aware, prioritisation is a very challenging subject that has been debated numerous times under various modifications.</p> <p>We also seek assurance, given the known challenges and constraints within the CSPN infrastructure, that the capacity increases being made under this modification are sufficient to deal with the extra demand that the MHHS Programme will put on the systems.</p>	
TMA Data Management Ltd	Other SEC Party	The Modification report states that "the SMIP envisioned Suppliers being the only organisations accessing and collecting data from smart meters" which is simply incorrect and counter-productive. The SMIP envisioned multiple parties being able to access data from Smart meters (Distribution Network Operators and Other Users). The benefits	We acknowledge this inaccuracy in the report and the clarification provided by the respondent.

Question 2			
Respondent	Category	Comments	SECAS Response
		of the SMIP come from parties other than the supplier being able to access consumption data.	
Energy Assets Group	Other SEC Party	SEC objective (d) states: "Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy". We do not believe that SEC is meeting this objective with the proposed solution.	
British Gas	Large Supplier	We remain concerned that the costs of implementing MP162 may rise considerably above the figures summarised in the Mod Report (£9.0m, plus £2.3m/year ongoing). These risks are acknowledged in the FIA (see sections 3.4, 4.1.1 and 4.2), but have not been recognised in the main Mod Report.	
IMServ Europe Ltd	Other SEC Party	-	