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MP162 ‘SEC changes required to deliver MHHS’

Annex G

Fourth Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the fourth MP162 Refinement Consultation.

Question 1: Do you agree that the revised solution scope and the assessment provided by the DCC provides the additional information sought by the Authority?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Although we agree the revision to the scope provides the information being sought by the Authority we would question how the elements being deemed outside of the scope of the Modification process are going to be advanced and, most critically, agreed and paid for. We were under the impression the costs for the items now no longer under the Modification would be far more costly than the items left in. The costs provided in the updated Modification Report seem to indicate the inclusion of the MDR being the most expensive and the other items far less. This was very unexpected. We welcome a fuller understanding of how the other items will be progressed and what work is being done to establish how this will all be paid for.	
IMServ Europe Ltd	Other SEC Party	No	DCC have included capacity management features in their response: Northbound prioritisation and SMETS1 Data Caching. The Authority's request is clearly stated in the modification report: "Following the Authority's decision to send back MP162, this modification will only deliver the new MDR User Role.	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>It will not include the additional capacity required by the DCC for MHHS or consider how the Service Requests are scheduled across the day”</p> <p>The intent of this statement is clear, and yet the DCC decided to include capacity related issues in their response on implementation of the MDR role, as both Northbound prioritisation and SMETS1 Data Caching are capacity management issues and identified as such by the DCC.</p> <p>Therefore, the costs of introducing the MDR role are overstated by the inclusion of capacity management issues.</p>	
Lowri Beck	Other SEC Party	Yes	<p>We agree that this change should not include the DCC’s capacity requirements – and it is clear these have been removed, except for one point:</p> <p>Under the section Additional Support Costs it states:</p> <p>‘The DCC expects MP162 will significantly increase the volume of messages being processed. As such, the operational service will require an uplift to support and maintain the solution’</p> <p>We are unclear as to how this differs from DCC capacity and therefore why it is still included if that area has been removed from charges</p> <p>We agree that the S1 caching requirements and northbound prioritisation whilst not being directly part of</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			the MDR role development, are critical to the functionality working and need to be considered – so unless they are split and a second MOD raised quickly, it would seem sensible for these points to continue to be included.	
E.ON	Large Supplier	Yes	Ofgem requested an analysis of costs of the technical implementation of the MDR role and that is what the DCC has provided.	
Maxen power Supply Limited	Small Supplier	No	We do not believe there is any sensible rationale for the implementation of this Modification. All of the suggested benefits can, in our view, be delivered using existing service requests and without any need for the proposed expense to be incurred by Suppliers.	
MHHS Programme	Other respondent	Yes	The revised solution meets the request from Ofgem to identify the costs of delivering the MDR role. However, we believe Northbound prioritisation and SMETS1 Caching are costs associated with Capacity and not to the MDR role.	
Scottish and Southern Electricity Networks	Networks Party	Yes	We agree with the revised solution and scope as this addresses the core changes required to facilitate the new role creation and implementation of MHHS.	
TMA Data Management Ltd	Other SEC Party	No	The analysis of costs of the technical implementation of the MDR role should only include the requirements set out in the proposed modification, however they include	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			integration testing for the wider MHHS release as well as technical approaches to manage capacity which do not belong in MP162 and are not a requirement of the MDR role.	
Stark	Other SEC Party	No	<p>The Authority specifically requested a view of the costs to technically implement the MDR only, excluding any additional costs related to capacity or scheduling. The costs presented in the PIA do not meet this requirement. First, they include integration testing for the wider release, which comprises other modifications than MP162. Secondly, they include the implementation of technical approaches such as “Northbound Prioritisation” and “SMETS1 Caching”, which are techniques to manage capacity. Whilst these are very sensible for efficient use of the system – urgent on-demand processes like prepayment and install & commission should not be impacted by scheduled processes like data retrieval for settlement – they do not belong in MP162, as stated in this very document.</p> <p>A separate workstream has been established to review the DCC’s MHHS capacity requirements and costs and these issues should be considered there. Their respective costs should be identified and isolated so they can be easily transferred to this already established workstream. The requirement for these techniques cannot be attributed to the MDR (MDR requests are substitutional, not</p>	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>duplicative and other DCC Users such as Electricity Networks, Import/Export Suppliers and Other Users will also drive increases in scheduled traffic under MHHS) and so including them in MP162 obscures the actual standalone costs to technically implement just the MDR User Role.</p>	
Siemens MAS	Other SEC Party	No	<p>The authority requested “<i>an analysis of costs of the technical implementation of the MDR role as set out in the proposed modification only, without any additional costs resulting from the broader implementation of MHHS that are not impacted by the implementation of the MDR role</i>” however we consider the inclusion of technical items:</p> <ul style="list-style-type: none"> • like northbound prioritisation & SMETS1 caching costs • integration testing for a wider release which comprises of multiple other modifications, <p>as not meeting this description as they are not a direct requirement of the MDR role.</p> <p>We are however supportive of activities that support sensitive and efficient use of the system, such as prioritisation of time critical activities like prepayment but we don't agree that these are a requirement of the MDR role and hence don't belong in this document. A separate workstream has been established to review the DCC</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>MHHS capacity requirements and we believe that capacity based issues should be handled there. This should have the impact of both accurately representing and reducing the MDR implementation costs while reducing the delivery timescales.</p> <p>Lastly and on a more general note, the need to increase / prioritise capacity is not created as a result of implementing the MDR role as the requests will largely be substitutional rather than duplicative.</p>	
SMS Plc	Other SEC Party	No	<p>The authority was clear that the analysis of costs of the technical implementation of the MDR role should include requirements set out in the proposed modification only, without any additional costs resulting from the broader implementation of MHHS that are not impacted by the implementation of the role. Whilst we support capability to ensure capacity, such as Northbound prioritisation (for time critical SRs such as Prepay top-up etc) and SMETS1 store and publish, these are not a requirement of the MDR role. Including these as part of this modification is likely to extend timeline for delivery and therefore costs. This could risk delays in delivery of the MDR role and ultimately put at risk MHHS Programme delivery.</p>	
British Gas	Large Supplier	No	<p>We agree that the revised solution scope will provide the specific additional information sought by the Authority, but we don't believe that the MDR role can, or should, be</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>assessed in isolation from the broader TOM and DCC capacity cost impacts.</p> <p>There is every chance that introduction of the MDR role will introduce more scheduled Service Requests – for example if a supplier does use a MDR for its Data for Settlement, it may still need to request the data directly for non-settlement purposes, so there would be the same data requested twice.</p> <p>DCC appears to have recognised this risk, hence the introduction of Northbound Prioritisation and SMETS1 caching into the remaining MP162 scope. However, if there are more Service Requests than anticipated (because of the new MDR role), this should be addressed by increasing the demand assumptions feeding into the DCC capacity review, not by introducing Northbound Prioritisation in particular.</p> <p>(SMETS1 caching seems less controversial, but Northbound Prioritisation seems inappropriate, when the solution required is more capacity, to deliver scheduled reports on time. It also is unclear how Northbound Prioritisation would fit alongside other modifications currently under progress on OTA prioritisation.)</p>	
EDF	Large Supplier	Yes	The revised solution scope only addresses the technical implementation of the MDR role, as requested by the Authority.	

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Question 2: Do you agree with the revised proposed implementation approach?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Being that, if this Modification is approved, that ALL Suppliers will have to uplift to a new version of DUIS, as we all need to be able to schedule obtaining the HH Profile data for ALL meters enrolled in the DCC Service, not just those for SMETS2+. So we've no choice but to uplift as we need the functionality to do so. The Enrolment and Adoption programme was to enable the management of Enrolled SMETS1 meters in the same way as SMETS2+, there is no optionality in the MHHS programme to exclude SMETS1 or include them later. For a Supplier to provide this across all eligible meters that must include SMETS1 too. This means having enough time to establish the changes to our systems and processes to be able to uplift accordingly, once the changes to DUIS are published and known.	
IMServ Europe Ltd	Other SEC Party	No	By including additional items related to capacity management (see response to Q1) it is likely that the time to deliver MP162 has extended. If MP162 is limited to those items as instructed by the Authority, delivery for the start of SIT should be possible which is in the better interests of industry and the MHHS programme.	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			Capacity related issues can all be delivered together at a later point in time.	
Lowri Beck	Other SEC Party	Yes	The revised proposal makes it clearer on the specific requirements and the implementation date of June 2024 means there should be sufficient time for work to be undertaken, still in line with MHHS plans. However, for organisations to be able to meet these requirements and meet timescales, there needs to be sufficient details and information available throughout this time to help all organisations implement the requirements, not just the DCC.	
E.ON	Large Supplier	No	Our position has not changed in that we do not believe the MDR is necessary for the delivery of MHHS	
Maxen power Supply Limited	Small Supplier	No	It appears to have been designed entirely to avoid the issues many suppliers have with the entire proposal	
MHHS Programme	Other respondent	Yes	Whilst supportive, we believe DCC should look to see if it is possible to deliver in an earlier release, and at the very least MHHSP has a requirement and dependency on DCC to put a version into the MHHS test environment to meet timescales for Programme SIT and provide evidence of testing before entry into MHHS SIT.	
Scottish and Southern	Networks Party	Yes	We agree with the revised implementation dates, however as this modification is introducing fundamental changes,	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity Networks			we believe that the new dates should remain flexible if the proposed dates become undeliverable.	
TMA Data Management Ltd	Other SEC Party	No	Capacity must be addressed separately in order to meet the current timescales, if they are not separated out this could extend the current timescales within the plan. Separating the capacity work stream would allow for delivery of the MHHS plan on current timescales and align with the MHHS SIT phase of the programme.	
Stark	Other SEC Party	No	By removing Northbound Prioritisation and SMETS1 Caching from MP162 and placing them in the “Capacity” workstream, there is an opportunity to reduce complexity and accelerate MP162’s implementation to align with the MHHS SIT phase (Feb 2024). This would de-risk and support delivery of the MHHS Programme plan.	
Siemens MAS	Other SEC Party	No	Including non-core MDR developments is likely to extend the implementation timescales. By addressing items, such as capacity, in the appropriate place, the implementation time is likely to be reduced. To help ensure the success of the MHHS programme, we believe that the creation of the MDR role aligned to the SIT testing phase of the program.	
SMS Plc	Other SEC Party	No	Including capacity related developments is likely to extend the implementation timescales. By addressing capacity separately, implementation time is likely to be reduced. For the success of the MHHS programme it is critical that	

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			the MDR role is created to align with the SIT testing phase of the program.	
British Gas	Large Supplier	No	<p>We consider that more time should be taken to understand whether the introduction of the MDR role (with its limited scope for just Data for Settlement) is appropriate and cost beneficial.</p> <p>We are not aware of any suppliers confirming that they would use an MDR agent to just process Data for Settlement on their behalf, and therefore this risks being an expensive modification for potentially no uptake.</p>	
EDF	Large Supplier	Yes	June 2024 would seem to be the earliest achievable release.	

Question 3: Will there be any impact on your organisation to implement MP162?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Unfortunately, although we support the MHHS TOM and it's inclusion of a MDR Role in the overall design, we feel that when that where it was decided and agreed, there was no consideration of the impact to the Smart design, the way Smart metering works or the cost of making such a change. We believe if that was all known and included in the discussion when signing off the TOM that it's highly unlikely it would have been included in the current guise that it is. Or, at the very least, there would have been work to understand how it could be achieved without impacting how Smart works and the responsibilities of the Suppliers in how they operate today. The consequential impacts are broad and far reaching. The biggest impact of the refined scope is, unfortunately, the same item that led to our previous recommendations to reject the Modification under it's previous guises, the huge cost to DCC Users, especially Suppliers, to enable a New Role to carry out functions and tasks that can be done already by ourselves. We do not believe this is a cost we should bear and, other than this being in the MHHS TOM, there is no other justification provided that outweighs the cost burden being placed on Suppliers to pick up.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
IMServ Europe Ltd	Other SEC Party	Yes	IMServ plan on implementing the MDR role as part of the MHHS programme	
Lowri Beck	Other SEC Party	Yes	We currently provide a field based, meter reading function which will significantly change due to the implementation of this SEC change, as we plan to become a third party service provider of the new Meter Data Retriever role. We would therefore need to implement a suitable IT solution to undertake this, establish new processes and appropriately resource the solution.	
E.ON	Large Supplier	Yes	As a supplier, my organisation will be funding the cost of implementing the MDR role via DCC Fixed charges. Our position has not changed in that the supplier agents who will benefit from it should be bearing the costs of implementation. We plan to continue to utilise existing Supplier User roles to access HH data. We have not as yet completed our Impact Assessment to ascertain the system enhancements that may be required to set up additional schedules.	
Maxen power Supply Limited	Small Supplier	Yes	An increase in costs for both ourselves and our SRP for little or no benefit to us.	
MHHS Programme	Other respondent	No	It is a requirement of the MHHS Programme to implement the MDR role, therefore it is a regulatory requirement to implement a solution to MP162.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Networks Party	Yes	<p>Due to the implementation of the SEC modification, if the demand forecast plans differ from the proposed volumes, this may have an impact on the northbound prioritisation solution.</p> <p>The inability for SSEN to access cached 4.8.1 data will also have an impact, as we are unable to collect this data due to license condition SLC10A. This means there will be increased data transfer on the network as we will need to collect the data which will be cached.</p>	
TMA Data Management Ltd	Other SEC Party	-	-	
Stark	Other SEC Party	Yes	We will need to complete UEPT for the MDR role.	
Siemens MAS	Other SEC Party	Yes	<p>MP162 creates the user role MDR and will form an element of the SDS role under the MHHS TOM. It is expected that independent agents operating in the Smart segment will be offering full SDS services and will therefore need to incorporate MDR within that offering. However, it is also important that agents have equal access to data as without it the business case of offering a service that is diminished in quality because of access restrictions is significantly reduced.</p> <p>Each of the roles within the new TOM require both significant initial design and development effort and</p>	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			ongoing operational support and must be carefully planned given the impact this has on ongoing work.	
SMS Plc	Other SEC Party	-	<i>Confidential response provided</i>	
British Gas	Large Supplier	Yes	This would fall within our broader preparations for the new era of Market Wide half hourly settlement.	
EDF	Large Supplier	No	<i>Confidential information provided</i> The exception to this being the share of the costs of MP162 that EDF will incur because of the DCC's charging methodology.	

Question 4: Will your organisation incur any costs in implementing MP162?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	£500k-£1m	Depending on the costs being split out based on Market Share or not, this will be just under £1M for us alone. To pay for something we can already do today and feel is not in our Customers best interests to have to pay for again so another party can provide the services we already offer them. We would also bear the costs of having to uplift our version of DUIS to the latest version to be able to manage our whole portfolio but, until we obtain all the SEC Changes, we cannot calculate those costs to us.	
IMServ Europe Ltd	Other SEC Party	Less than £100k	Minor part of the MHHS programme implementation	
Lowri Beck	Other SEC Party	-	The associated costs are unknown at this time as we have not completed the procurement of a software solution or determined the cost of changes required to other IT services. There will also be consequential costs as above, from the implementation of new processes and resources.	
E.ON	Large Supplier	Yes	As above This modification will not deliver any cost savings nor would there would be any impact to our organisation if the modification is not implemented	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Maxen power Supply Limited	Small Supplier	£100k-£250k	We see no opportunity for savings in this proposal, only additional costs.	
MHHS Programme	Other respondent	No costs	There will be significant costs if MP162 is not approved as it will require a Change Request to the MHHS Programme for the MHHS design and Target Operating Model to be reworked. This will delay the proposed benefits for customers being realised at a time when they urgently need a solution that allows them to reduce their electricity bills via flexible tariffs.	
Scottish and Southern Electricity Networks	Networks Party	No costs	Due to the reduced scope, we believe there shouldn't incur any implementation costs.	
TMA Data Management Ltd	Other SEC Party	-	-	
Stark	Other SEC Party	-	<i>Confidential response provided</i>	
Siemens MAS	Other SEC Party	Yes	We are not in a position to quantify the cost of implementation and operational effort without fully analysing the solution. We have outline plans for the development and have built this into our Programme plan but feel at this stage it is premature to expose these.	

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
SMS Plc	Other SEC Party	-	<i>Confidential response provided</i>	
British Gas	Large Supplier	-	In theory, this would depend on whether we undertook the MDR role ourselves in house, or outsourced it. We do not currently have any intention to use an MDR, particularly if they can only provide access to data for settlement.	
EDF	Large Supplier	No costs	<i>Confidential information provided</i>	

Question 5: How long from the point of approval would your organisation need to implement MP162?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	6 to 8 months	This is dependant on the amount of changes included in the new version of DUIS and any other changes to the SEC itself that we would need to make. It is likely we could make the changes quicker if we knew what changes were included. We still need to understand the path for all Users needing to upgrade and meet the MHHS time lines. If these require all to be ready on the same date, or over a set period than this would drive our readiness. We're also beholden to other MHHS changes needing to be made and these are still being discussed.	
IMServ Europe Ltd	Other SEC Party	6 months	It is well understood what needs to be delivered to interface to the DCC for MP162	
Lowri Beck	Other SEC Party	-	We are a Participant in the MHHS Programme and once their plan is baselined, we will be in a position to determine our plan.	
E.ON	Large Supplier	-	-	
Maxen power Supply Limited	Small Supplier	-	Unclear at present	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	Other respondent	-	-	
Scottish and Southern Electricity Networks	Networks Party	-	-	
TMA Data Management Ltd	Other SEC Party	-	-	
Stark	Other SEC Party	6 months	Process and timelines for MDR UEPT need to be understood.	
Siemens MAS	Other SEC Party	-	<p>This is related to Question 4 and is difficult to quantify without a full understanding of the solution. We will, of course, endeavour to meet the challenging timescales of the MHHS programme and will plan resources to meet these but will need to schedule the opportunity in with our other responsibilities.</p> <p>We have made our outline MHHS Project Plan available to the MHHS Programme and this provides detail of where in the timeline we expect to develop and test our MDR offering but this is subject to change.</p> <p>We have considered SDS as whole and provided an outline plan in a recent submission, highlighting the typical activities undertaken in developing a new solution. This has been done as “T-shirt size” estimate based on a</p>	

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			detailed view of the size of each the roles in relation to each other. We are naturally reluctant to detail this further at this stage due until detail of the solution is signed-off and artefacts made available.	
SMS Plc	Other SEC Party	-	<i>Confidential response provided</i>	
British Gas	Large Supplier	-	This would fall within our broader preparations for the new era of Market Wide half hourly settlement.	
EDF	Large Supplier	0 months	<i>Confidential information provided</i>	

Question 6: Do you believe that MP162 would better facilitate the General SEC Objectives?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No	<p>As previously stated, we believe the MHHS TOM was created without a clear view or understanding of the impacts to Smart metering and the way the DCC has been implemented. As such the SEC Objectives cannot align to it as things stand. Objective (a) can be met today without this new Role, so it being maximised by having a new Role, at a cost to consumers, is not something the SEC objective has when being considered.</p> <p>How is Objective (c) better facilitated by having another Role able to obtain and provide data that a Supplier can today? This implies that without this new Role, the allocation would be worse than it is today, or at least no better? That is not the case.</p> <p>Objective (g) – if there is no MDR Role in the DCC, does that mean the wider programme of MHHS cannot be delivered as planned? So the Supplier acting in this Role does not meet this and it's only when it's performed by another organisation, even though the design of MHHS clearly calls out that it can be done by both. As previously stated, the MHHS TOM was signed off before the full understanding was known of the impacts of having this Role and the changes needed.</p>	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
IMServ Europe Ltd	Other SEC Party	Yes	Implementing MP162 meets the first, third and fourth SEC objectives The MDR role is fundamental to the MHHS TOM, which is even more important than the SEC objectives too.	
Lowri Beck	Other SEC Party	Yes	We consider that the implementation of this change will help deliver Market Wide Half Hourly Settlement, which helps with achieving the following SEC objectives through using Smart meters to provide data to enable further technological developments, benefits to consumers and improvements to the electricity network: Objective C - Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering system Objective E - Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.	
E.ON	Large Supplier	No	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.	
Maxen power Supply Limited	Small Supplier	No	The objectives can be achieved using existing means	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
MHHS Programme	Other respondent	Yes	DCC has an obligation to facilitate the MHHS Programme and it is a requirement of the MHHS design that the MDR role is implemented. This in turn will deliver benefits for consumers outlined in the business case. Any delay in the Programme will defer the benefits for consumers at a time they need support.	
Scottish and Southern Electricity Networks	Networks Party	Yes	We agree that this modification will better facilitate Objective (c) and Objective (g) as detailed in modification report.	
TMA Data Management Ltd	Other SEC Party	Yes	The MDR role aligns with the TOM implementation of the MHHS Programme Delivery. Permitting independent agents to include MDR as part of the SDS service reduces hurdles for entry into the market and allows competition and cost effective solutions as an alternate to those operating in-house solutions. It also allows regular collection of HH data from smart meters against sporadic register reads which will benefit customers with accurate billing.	
Stark	Other SEC Party	Yes	Objective a) positive – regular collection of HH data from Smart meters by MDRs will better promote their efficient provision and operation than infrequent collection of register reads	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Objective b) positive – we agree with SECAS view that implementing MDR will allow DCC to comply with its Licence requirement to facilitate implementation of the MHHS TOM</p> <p>Objective c) positive – we agree with SECAS view that MDR will support delivery of the MHHS TOM, which will enable consumers to benefit from more accurate allocation of their consumption as well as gain access to that data for energy management purposes from their supplier</p> <p>Objective d) positive – creation of the MDR will enable independent organisations to compete in a market for Smart data retrieval services, which is a commercial activity connected with the supply of energy. Equally, this will promote competition between suppliers</p> <p>Objective e) neutral</p> <p>Objective f) neutral</p> <p>Objective g) positive – we agree with SECAS view that delivering MDR as set out in the TOM will enable the wider MHHS Programme to be delivered as planned</p>	
Siemens MAS	Other SEC Party	Yes	Enabling independent agents to include MDR activities as part of an SDS service offering allows smaller suppliers and new entrants to offer a cost-effective alternative to	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			<p>those completing these activities inhouse and reduces barrier to entry into the market.</p> <p>The introduction of the MDR role aligns with the current Target Operating Model implementation of the MHHS Programme Delivery</p> <p>Lastly, we believe that MP162 positively impacts SEC objectives: a, b, c, d, and g with no negative impact on objectives: e & f.</p>	
SMS Plc	Other SEC Party	Yes	<p>Enabling independent agents to include MDR activities as part of an SDS service offering allows smaller suppliers and new entrants to offer a cost effective alternative to those completing these activities inhouse and reduces barrier to entry into the market.</p> <p>The introduction of the MDR role aligns with the current Target Operating Model implementation of the MHHS Programme Delivery</p> <p>The modification could be implemented more efficiently and cost effectively with capacity elements delivered separately.</p>	
British Gas	Large Supplier	No	<p>We can of course see the broader benefits on MHHS, but can not see any benefits to the General SEC objectives for MP162 and the introduction of MDRs.</p>	

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
EDF	Large Supplier	No	<p>We have not seen any evidence that MP162 would better facilitate any of the General SEC Objectives.</p> <p>Specifically, we have not seen any evidence that indicates that any suppliers would seek to use a third party to carry out the MDR role in their behalf. There is no evidence that suggests that this new functionality would be used, in which case no benefit will be achieved by its implementation.</p>	

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP162 is implemented?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	We fully believe there will be direct financial impacts to consumers as they will end up footing the bill for enabling this functionality will little to no benefit whatsoever. The ability to obtain settlement data via the DCC will remain the same to them if a Supplier does it or a MDR. There is no benefit achieved to consumers, or competitive measures that will cascade through to them, that outweigh the costs of adding this Role to the DCC Service.	
IMServ Europe Ltd	Other SEC Party	Yes	Facilitates effective choice and competition in the market for collection and processing of data from smart meters	
Lowri Beck	Other SEC Party	Yes	As Question 6, the introduction of this change will allow for greater degrees of consumption/settlement data which can be used to benefit consumers through a range of options, such as suppliers offering time of use tariffs and the development of technologies for smart appliances. In addition, costs to consumers via energy supplier charges will hopefully be reduced as settlement becomes more accurate.	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
E.ON	Large Supplier	Yes	Consumers will be indirectly affected by increased pass-through costs	
Maxen power Supply Limited	Small Supplier	Yes	No benefit to customers but additional passthrough costs	
MHHS Programme	Other respondent	Yes	By implementing MP162 the MHHS Programme can proceed with the design and TOM agreed by Industry and approved by Ofgem. This will deliver the benefits outlined in the MHHS Full Business Case to consumers of up to £4.5bn	
Scottish and Southern Electricity Networks	Networks Party	Yes	Consumers should see monetary benefits with this SEC Mod coming into effect with full benefits being realised once all suppliers settle their consumers on a half hourly basis.	
TMA Data Management Ltd	Other SEC Party	Yes	Provides competition between agents and suppliers.	
Stark	Other SEC Party	Yes	Competitive pressure in the market for smart data retrieval services will deliver positive outcomes for consumers through lower prices, better quality of service and innovation. Similarly, being able to choose who collects their data for settlement will confer greater control over their privacy and could drive uptake of MHHS.	
Siemens MAS	Other SEC Party	Yes	MP162 facilitates competition between agents & suppliers which improves market competitiveness, fosters	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			consumer choice and drives higher levels of quality / service.	
SMS Plc	Other SEC Party	Yes	Facilitates competition between agents and suppliers, improving market competitiveness and fostering consumer choice.	
British Gas	Large Supplier	No	We can of course see the broader benefits of the MHHS programme to consumers, but do not see any positive benefit from the introduction of the MDR role, especially if no suppliers are intending to use it. As currently proposed, it would just be an extra cost, that would eventually be passed through to consumers.	
EDF	Large Supplier	No	<p>We agree that MHHS has the potential to provide significant benefits to consumers, as detailed on Ofgem's business case for MHHS.</p> <p>However, while the MDR role forms part of the TOM for MHHS, there is no direct relationship between the introduction of that new role and the achievement of the benefits in the Ofgem business case, because most of the cost savings will come from increased flexibility and demand side response (using energy in different ways and at different times), rather than simply the increased accuracy to settlement. The flexibility and DSR benefits will not be impacted by this change as the proposed MDR</p>	

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<p>role is applicable only to gathering data for settlements purposes.</p> <p>Even then, as suppliers are already able to retrieve the data required to deliver MHHS from smart meters, the achievement of the benefits of MHHS is not dependent on the introduction of the MDR role.</p> <p>In the absence of any evidence that there are suppliers that will seek to use MDR Agents for MHHS, it is not possible to identify any benefits to consumers arising as a direct result of the implementations of MP162; or that the benefits of MHHS will be impacted in any way if MP162 were not implemented.</p>	

Question 8: Noting the costs and benefits of this modification, do you believe MP162 should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No	We were under the impression the majority of the costs previously set out in the 3rd Consultation were made up of the Capacity and TRTs and not to implement the changes to include the MDR Role. As such we were shocked to see the amount this element alone will cost. As such, we cannot approve this as we will bear those costs in full as the changes required to the SEC to allocate them differently are not taking place. We cannot justify those costs to Suppliers and their customers for something that provide us no benefits.	
IMServ Europe Ltd	Other SEC Party	Yes	Whilst it is disappointing that unnecessary items and costs have been included in this assessment, which could further delay MP162, for the sake of the overall programme, MP162 should proceed asap.	
Lowri Beck	Other SEC Party	Yes	We acknowledge that there is significant cost associated with this change and we would expect there to be stringent assessment that this is accurate and charges are monitored to ensure they do not increase. We are aware that this change may not benefit all SEC parties, but may benefit other organisations who are not currently subject to SEC charges. Therefore we suggest	

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			that consideration should be given to determining appropriate charging to all impacted parties, particularly those who will benefit from the change i.e. successful MDRs. We acknowledge DP218 has been raised to consider this.	
E.ON	Large Supplier	No	<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 MDR 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>	
Maxen power Supply Limited	Small Supplier	No	The proposal does not, in our view, provide any benefit to any Party or to consumers and increases costs for everyone.	
MHHS Programme	Other respondent	Yes	All Programme participants have an obligation to support the timely implementation of the MHHS Programme. Industry has agreed the MHHS Target Operating Model which requires the implementation of the MDR.	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Networks Party	Yes	Noting the detail contained within the modification report, we believe this modification should be approved.	
TMA Data Management Ltd	Other SEC Party	Yes	We believe the delivery of the MDR role is critical to the MHHS plan, therefore approving this modification is vital to meet the current timescales of the plan and reduce the risk of delays. Capacity should not be part of this modification and should be separated out.	
Stark	Other SEC Party	Yes	Noting that the highlighted costs related to capacity will need to be borne regardless of MP162, we believe that MP162 should be approved to avoid further delay and risk to MHHS Programme delivery.	
Siemens MAS	Other SEC Party	Yes	We believe that MP162 should be approved to avoid further delays to the MHHS program however we note that the previously highlighted issues with additional complexity & costs should be handled in alternative places as they will be required regardless of the MDR role.	
SMS Plc	Other SEC Party	Yes	Whilst we recognise capacity and prioritisation are likely to be required to deliver MHHS, we do not believe they should be included in this modification, however, due to the delivery of the MDR being critical to the MHHS	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			programme, we believe approving this modification presents a lower risk to the programme at this time, rather than delaying for further refinements.	
British Gas	Large Supplier	No	-	
EDF	Large Supplier	No	<p>The costs of MP162 are still very high, even though the costs of additional capacity have been removed from the scope of this Modification.</p> <p>In the absence of any evidence that there are suppliers that will seek to use MDR Agents for MHHS and given that suppliers are already able to retrieve the data required for MHHS, there is no evidence whatsoever that the costs of implementing this Modification will result in any benefits to consumers, or to the achievement of the MHHS business case.</p>	

Question 9: Please provide any further comments you may have

Question 9			
Respondent	Category	Comments	SECAS Response
OVO	Large Supplier	We welcome a full understanding of how the elements deemed outside the scope of this Mod will be progressed and how the costs shall be recovered. Especially if any changes to the DCC Core services are being made but are to be covered outside of Section D.	
IMServ Europe Ltd	Other SEC Party	The working group highlighted the obvious flaws with the assessment as performed. Despite this, the assessment came out for consultation unamended. This process could be improved for the benefit of all participants.	
Lowri Beck	Other SEC Party	-	
E.ON	Large Supplier	-	
Maxen power Supply Limited	Small Supplier	This proposal should be withdrawn for a complete re-consideration	
MHHS Programme	Other respondent	Industry has agreed under the jurisdiction of the MHHS Programme to implement the Target Operating Model and the MDR role is part of that requirement. If SEC parties do not support the MDR role then this should be dealt with within the MHHS Programme and not via the SEC.	
Scottish and Southern	Networks Party	Due to the reduced scope, the impacts to SSEN should be minimal, if any.	

Question 9			
Respondent	Category	Comments	SECAS Response
Electricity Networks		As our main concern from the initial proposal of this SEC Modification has always been the impact to overall traffic capacity. It is vital that SEC parties are included in the separate workstream that will now look to address the issues surrounding the increase in message volumes, MHHS will introduce.	
TMA Data Management Ltd	Other SEC Party	-	
Stark	Other SEC Party	<p>We recognise that the DCC Charging Methodology is not well aligned to usage and would welcome a change in methodology. If correctly implemented, this could also create natural incentives to use the infrastructure efficiently. DP218 has been raised to consider this issue and we are ready to participate as a workgroup member.</p> <p>The DCC have already stated that additional capacity is required for base MHHS assumptions, irrespective of MP162. Current usage of the system is far below that expected under MHHS by the same set of Users (IS/ES/Networks). This suggests that techniques like northbound prioritisation and SMETS1 caching will be required regardless of MP162 and the introduction of the MDR. This further demonstrates why the cost to implement them should sit outside of MP162.</p> <p>Whilst we agree that prioritisation based on request type (i.e. on-demand vs. scheduled) is sensible, any approach that prioritised scheduled requests based on User could be discriminatory.</p>	

Question 9			
Respondent	Category	Comments	SECAS Response
Siemens MAS	Other SEC Party	It is unfortunate that despite clear guidance from the Authority, MP162 still contains capacity related activities. This risks further delays to implementation of this modification.	
SMS Plc	Other SEC Party	SMS find it frustrating that despite clear guidance from the Authority, the implementation still contains capacity related activities. This risks further delays to implementation of this modification.	
British Gas	Large Supplier	-	
EDF	Large Supplier	<p>We remain concerned that, should this Modification be approved, that the costs of implementation and support will be borne by all energy suppliers, and not just those (if any) that choose to use an MDR Agent. The current charging methodology means no costs will be incurred by the MDR Agents that will benefit from the implementation of these changes.</p> <p>We are pleased to see that DP218 (Review of the SEC Charging Methodology) has been raised by the DCC and that changes to the SEC Charging Methodology are being considered that will hopefully address this and ensure a fairer allocation of DCC change costs to those that will benefit from the changes driving those costs.</p>	