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MP122B ‘Operational Metrics – Part 2’ Second Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP122B Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	While we approve of the changes proposed for progression and recognise the enhanced reporting on SMETS2 Alerts and Incident Categories 3.4.5 will allow for more accurate representation of DCC System performance, the fact there is a cost of change for CSPN v CSPC&S is disappointing. We note activity around network enhancement / potential of cellular communication in the north region. If a scenario where a significant portion of CH coverage in the north may be provided through a service provider where this change is part of their standard service, then the benefits of this modification are diminished. Given the cost of change and ongoing work on scaling and optimisation / future enhancements, there is a need for transparency from the DCC on future predictions and outcomes to ensure industry make an informed decision and are not incurring unnecessary cost.	SECAS will relay this response to the DCC and request further details on the overlap between the MP122B changes and the ongoing work cited.
OVO	Large Supplier	Yes	Although we agree this resolved 'some' of the issue, it still leaves much outstanding and does not cover all the elements that the Mod was raised to address, all due to cost that cannot be justified. This is still the case.	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	<p>We agree it will effectively resolve the identified issue(s), but it is expensive.</p> <p>We agree that it will be helpful to have a more granular approach to alert reporting. In particular, the opportunity to understand in more detail where/how alerts drop out will be really useful.</p>	
Electricity North West Limited	Network Party	Yes	No comments.	

Question 2: Do you agree that the legal text will deliver MP122B?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	No comments.	
OVO	Large Supplier	Yes	No comments.	
British Gas	Large Supplier	Yes	We are happy with the proposed legal text.	
Electricity North West Limited	Network Party	Yes	No comments.	

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	We agree with the implementation approach. It also appears sensible to make all required changes in one SEC release as opposed to a phased implementation.	
OVO	Large Supplier	Yes	No comments.	
British Gas	Large Supplier	Yes	No comments.	
Electricity North West Limited	Network Party	Yes	No comments.	

Question 4: Will there be any impact on your organisation to implement MP122B?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	No immediate impacts	As stated in our initial response, the only initial impact relates to monitoring of the reports produced re DCC performance. The report findings may require additional action and impact but this would be driven by the reporting itself, which we cannot foresee until these are produced.	
OVO	Large Supplier	Yes	We would need to make changes to be able to factor the new reporting metrics we will receive. These are not seen as complex, onerous or expensive in any way. The only other impact is the split in the costs we will need to pay.	
British Gas	Large Supplier	No	No comments.	
Electricity North West Limited	Network Party	No	No comments.	

Question 5: Will your organisation incur any costs in implementing MP122B?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	No	No comments.	
OVO	Large Supplier	Less than £100k	It is impossible to establish the cost savings in receiving information we all feel we should already be receiving and available to us. This is allowing the reporting to more accurately reflect the behaviour of the DCC to Users and align the 2. That does not, in itself, bring any benefits to us as Users. Noting this is all aligned to metrics and reporting for Ofgem.	
British Gas	Large Supplier	No costs	No comments.	
Electricity North West Limited	Network Party	N/A	No comments.	

Question 6: How long from the point of approval would your organisation need to implement MP122B?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	N/A	We would not require any time to implement MP122B.	
OVO	Large Supplier	No time at all	Nothing is changing our side, other than this being linked to a DCC Release and all the changes that come with that. This Mod in isolation brings no changes to Users.	
British Gas	Large Supplier	N/A	No comments.	
Electricity North West Limited	Network Party	N/A	No comments.	

Question 7: Do you believe that MP122B would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	SEC Objectives (b) & (g), as outlaid in the modification report.	
OVO	Large Supplier	Yes	As set out in the Mod Report.	
British Gas	Large Supplier	Yes	Would benefit SEC General Objectives (a), (b) and (g).	
Electricity North West Limited	Network Party	Yes	No comments.	

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP122B is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	No immediate impact	There are no immediate impacts or benefits. The reporting may identify areas of DCC System performance that require improvement which may lead to benefits for consumers if addressed. These impacts/benefits will be driven by the report findings themselves and as such are difficult to quantify at this time.	
OVO	Large Supplier	Yes	The costs set out still seem very high for what is being delivered. Noting this is all work within the DCC Ecosystem so why a cost of in excess of £1M is set it not clear or drawn out. Although the costs have dramatically reduced, it's fair to say they are still hard to justify for the work being done. We would also question was support is needed for SEC Parties to pay for ongoing?	SECAS will request that the DCC provides greater cost details, including ongoing SEC Party support. The DCC's response will be captured in the Modification Report.
British Gas	Large Supplier	No	IA costs will potentially impact consumer bills, but improved service will indirectly benefit consumers.	
Electricity North West Limited	Network Party	Yes	No comments.	

Question 9: Noting the costs and benefits of this modification, do you believe MP122B should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	We approve of the modification but further transparency is needed as per response to Q1. MP122B allows a more accurate and granular assessment of DCC performance and its service offering provided to Users. It may also lead to identification of issues that are impacting DCC performance, which if addressed, could provide benefits to SEC Parties and energy consumers.	SECAS will relay this response to the DCC and request further details on the overlap between the MP122B changes and the ongoing work cited.
OVO	Large Supplier	Yes	Although the costs are high, the changes being proposed will allow for us to have a better understanding of the overall DCC performance and breakdowns we do not have today. What we would like is to challenge the costs against the benefits as that may lead us to respond with No to this question if they do not stack up.	SECAS will request that the DCC provides greater cost details. The DCC's response will be captured in the Modification Report.
British Gas	Large Supplier	No	Before approving, we think there should be a further discussion on the costs. Having reviewed the two latest IAs, for CR4445 (July 2022, £1.01m) and CR4392 (May 22, £161k), we don't quite understand how these have come out so expensive, for the changes they include.	SECAS will request that the DCC provides greater cost details. The DCC's response will be captured in the Modification Report.

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			This is presumably data already exists, as it is already being counted and analysed for the current reporting. We don't understand why providing extra granularity is quite so expensive.	
Electricity North West Limited	Network Party	Yes	No comments.	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
Utilita Energy Limited	Large Supplier	No comments.	
OVO	Large Supplier	Not at this time.	
British Gas	Large Supplier	No comments.	
Electricity North West Limited	Network Party	No comments.	