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MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'

October 2022 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard (AB)	SECAS
Joey Manners (JM)	SECAS
Bradley Baker (BB)	SECAS
Elizabeth Woods (EW)	SECAS
Mike Fenn (MF)	SECAS
Rachel Black (RBI)	SECAS
David Walsh (DW)	DCC
Chris Thompson (CT)	DCC
Robin Seaby (RS)	DCC
Samuel Manson (SM)	DCC
Patricia Massey (PM)	BEAMA
Eleanor Taylor (ET)	BEIS
Julie Brown (JB)	British Gas
Alex Hurcombe (AH)	EDF
Daniel Davies (DD)	ESG
Martin Bell (MB)	EUA
Gemma Slaney (GS)	National Grid Electricity Distribution
Kelly Kinsman (KK)	National Grid Electricity Distribution
Ralph Baxter (RBa)	Octopus Energy
Jamie Flaherty (JF)	Ofgem
Audrey Smith-Keary (ASK)	OVO Energy
Mafs Rahman (MR)	Scottish Power
Lorna Clarke (LC)	SMDA
Shuba Khatun (SK)	SSE Networks
Andy Knowles (AK)	Utilita
George MacGregor (GM)	Utilita

Overview

Issue

- Consumers are approaching their Suppliers to have smart meters installed in 'dumb' mode.
- There is currently no way to do this without impacting other obligations within the SEC.
- Non-communicating Devices appear as instances to be resolved.

Business Requirements

1. Suppliers will be able to notify the DCC of the customer's preference for Smart functionality.
2. A flag will be created to indicate if communications with a Device have been reduced due to customer choice.
3. Critical, Security and Safety Alerts will still be sent when communication with a Device has been reduced due to customer choice.

Proposed Solution

- A process where certain non-essential aspects of Smart functionality can be suppressed.
- Additional step to 'all reasonable steps'.
- A flag indicating that communication with a Device has been reduced due to consumer choice.

Ref.	Description	MoSCoW
1	Suppliers to be able to notify the DCC of consumer preference for Smart functionality.	M
1.1	New SRVs to be created or existing SRVs to be adopted to allow Suppliers to notify the DCC of consumer preference.	C
1.2	Notification to result in suppression of Smart functionality.	C
2	A flag will be created to indicate if communications with a Device have been reduced due to customer choice.	M
2.1	The flag to be visible through the DCC System.	C
2.2	The flag to be capable of indicating other information (e.g. no Smart functionality due to no-WAN site).	C
2.3	The flag to have its own functionality (e.g. presence of flag suppresses Smart functionality).	C
3	Critical, Security and Safety Alerts will still be sent when communication with a Device has been reduced due to customer choice.	M (if 1.2 included)

SECAS presented the above must-have, should-have, could-have, won't-have (MoSCoW) analysis for the different requirement components to be considered as part of the solution.

Working Group Discussion

Business requirements

A Working Group member (RB) asked to clarify if the suggested changes were DCC System changes and not changes to Devices. SECAS (MF) confirmed this was the case.

A Working Group member (MR) queried whether the solution would allow for Smart functionality to be introduced if a new customer took over the premises and requested it. SECAS (MF) confirmed that it would – one of the benefits of the modification would be that more Smart-capable meters can be installed, shortening the process when a customer decides to adopt Smart functionality.

Solution Design – MoSCoW

A Working Group member (RB) queried whether the requirement for still allowing Critical Commands to be sent to Devices with suppressed Smart functionality includes Firmware Upgrades, as it may not be possible for a Device to 'catch up' if its Firmware version is too far out of date. Another Working Group member (JB) agreed that Device Firmware should be kept as up to date as possible. SECAS (MF) agreed to update the Modification Report and business requirements to specify that these are included.

A Working Group member (DD) asked if existing SRVs for 'Opt In/Opt Out' could be repurposed for this solution. SECAS (MF) advised this has been investigated but the DCC has concluded that these wouldn't fit with the MP169 solution and so there would be no cost or efficiency savings to doing this.

A Working Group member (AH) queried if the solution would include the capability for Suppliers to remove or apply the 'flag' remotely when there is a Change of Tenancy (CoT) or a Change of Supplier (CoS). SECAS (MF) confirmed it would.

A Working Group member (RB) noted that Ofgem involvement and buy-in is critical for the success of this modification and queried whether Ofgem's concerns regarding the potential undermining of 'all reasonable steps' have been addressed. SECAS (MF) advised that Ofgem's stated position is that if the solution undermines 'all reasonable steps' it would not be supportive, but have not provided a confirmed view on whether the Proposed Solution does that. SECAS (MF) and the Proposer (EL) confirmed their position that the MP169 solution does not undermine 'all reasonable steps' but constitutes an additional step to be taken once these are exhausted. An Ofgem representative (JF) advised this would be fed back to their organisation for a view.

A Working Group member (JB) asked whether the solution could mirror the process for when a meter goes into 'Suspended' status, whereby only a limited number of SRs can be sent to that asset. JB also noted that the DCC is already able to report on this status and so it may remove the need for additional System flags. SECAS (MF) agreed to investigate this.

A Working Group member (MB) queried whether once the flag is added by the DSP System, would it be the DSP suppressing SRs or would it be the Supplier? SECAS (MF) advised it shouldn't be the Suppliers' responsibility, but this can be looked at in more detail during the DCC's Preliminary Assessment.

A Working Group member (DD) queried what will happen to Alerts which originate at the Device, for example 8FOA (billing calendar). SECAS (MF) advised this will be investigated as part of the technical solution; potentially the DSP would have to be prevented from forwarding these Alerts.

A Working Group member (MR) queried what the process is when a consumer doesn't want a Smart meter but wants access to Prepayment services. SECAS (MF) advised that if a customer's requirements necessitate Smart functionality, the Supplier will have to install the meter in Smart mode. This is the responsibility of Suppliers to discuss options with their customers.

A Working Group member (RB) noted that whenever Prepayment conversations are opened up, it is never straightforward as there are many factors to be explored and Ofgem will probably need this information to make a decision. SECAS (MF) advised this is being discussed at the Prepayment Meter Forum (PPMF) and will be considered as part of the solution.

A Working Group member (MR) highlighted that if flags are to be introduced which give status information and affect what messages can be sent to and from Devices then this would likely need to align with other Codes (e.g. Retail Energy Code (REC)). SECAS (MF) agreed to investigate and engage the relevant Code Authorities to ensure alignment.

Next Steps

The DCC (DW) recommended another business requirements workshop given the changes that have been made since the last discussion. SECAS (MF) agreed to schedule this.

Questions for the Working Group

A Working Group member (RB) questioned whether Citizens Advice have been consulted on these changes. SECAS (MF) advised the modification has been discussed with Citizens Advice and Energy Ombudsman UK to investigate possibilities, and both organisations' consumer guidance has subsequently been revised to more accurately reflect the options available. RB noted that this was a positive step.

Next Steps

The following actions were recorded from the meeting:

- SECAS (MF) to update the business requirements to specify exemption of firmware updates and present for discussion with the DCC and its Service Providers at a requirements workshop.
- SECAS (MF) and the Proposer (EL) to consider the points raised by the Working Group before requesting a DCC Preliminary Assessment.
- Ofgem (JF) to discuss solution internally. SECAS (MF) to engage Ofgem on its view.