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

Annex A

Business requirements – version 0.3

About this document

This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The Data Communications Company (DCC) will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	**Requirement**
1	Suppliers will be able to notify the DCC of the consumer's preference for Smart functionality.
2	A DCC System flag will be created to indicate if communications with a Device have been reduced due to consumer choice.
3	The responsible Supplier will be able to request the addition and removal of the DCC System flag, subject to its adherence with all reasonable steps for Smart installations.
4	Critical, Security and Safety Alerts and Firmware updates will still be sent when communication with a Device has been reduced due to consumer choice.
5	The Data Service Provider (DSP) will notify the Communications Service Provider (CSP) when a DCC System flag has been applied.
6	The DCC to amend any reporting for which the success/failure of Service Requests relating to energy consumption is a metric to allow for exceptions where communications have been reduced due to consumer choice.

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

This solution will be applied to Smart Metering Equipment Technical Specifications (SMETS) 2 Devices only.

2.2 Requirement 1: Suppliers will be able to notify the DCC of the consumer's preference for Smart functionality.

At the Working Group meeting in November 2021 the Ofgem representative expressed the view that using Service Reference Variants (SRVs) to notify the DCC could undermine Supplier Licence obligations. The solution was subsequently developed to state that Suppliers should only offer a 'reduction' in Smart functionality once all reasonable steps to install and commission a fully communicative Smart meter have been exhausted. Existing Install and Commissioning processes will be unaffected by the solution; the MP169 solution will simply add an additional, optional step to be taken in the event that a consumer wishes to not have their consumption data retrieved remotely.

Exceptions to this requirement are to be considered through the solution development process. For instance, any consumer on an Economy 7 tariff (or similar) arrangement relies on the Smart meter communicating. Potential Network Managed sites with no Wide Area Network (WAN) and those on specific Radio TeleSwitched regimes must also have communications. In such exceptional cases, where a Smart meter is refused, this needs to be communicated to the customer and the option of reducing communications removed.

Notification of consumer preference should only be sent after the Smart Meter and Communications Hub have been installed and commissioned. It should also be possible to send them if there is a Change of Tenancy (CoT) and the incoming tenant has different preferences to the outgoing tenant.

The DCC will need to amend its reporting on Supplier obligations to install Smart meters to allow for the scenario where a Supplier has installed and commissioned a SMETS2+ Device which subsequently has reduced communications due to consumer preference.

2.3 Requirement 2: A DCC System flag will be created to indicate if communications with a Device have been reduced due to consumer choice.

The presence of a flag in the DCC System would prevent consumer preference being lost in a Change of Supplier (CoS). It will also prevent the new Supplier from wasting time and resource investigating the reason for lack of communication.

This flag could be held in the DCC System and its presence have the function of suppressing certain Smart functionality. It could also be held outside of the DCC System, for instance in the Priority Service Register. During solution development it was agreed that the most effective option would be for the flag to be applied within the DSP System at Device level.

2.4 Requirement 3: The responsible Supplier will be able to request the addition and removal of the DCC System flag, subject to its adherence with all reasonable steps for Smart installations.

Suppliers are able to appoint Other SEC Parties to collect consumption data on their behalf or to offer data services to consumers. While this modification will not impact these commercial arrangements, it must be ensured that consumers' data privacy is not undermined by allowing Other SEC Parties to remove the DCC System flag. It is therefore a requirement that only the responsible Supplier can request the addition or removal of the DCC System flag, and its addition can only be requested once the Supplier has completed all reasonable steps to install the Device in a fully communicative state.

2.5 Requirement 4: Critical, Security and Safety Alerts and Firmware updates will still be sent when communication with a Device has been reduced due to consumer choice.

The Smart Metering solution is designed for Security and Safety Alerts to be provided and sent out. This is part of the benefits case and solution in place for Distribution Network Operators (DNOs). Smart Energy Code (SEC) Parties are also required to act on specific critical or mandated Alerts. Which Alerts require exceptions and the mechanism for allowing them to be sent will be agreed during the solution development process.

Critical Alerts, such as those relating to Certificate updates, are necessary to ensure the security of the DCC System. Firmware updates will also still need to be possible to prevent issues with Device firmware version compatibility, which may result in the need to replace otherwise healthy Devices.

During solution development, it was agreed that the only messages which should be prevented from sending are those which relate directly to the consumer's consumption.

2.6 Requirement 5: The DSP will notify the CSP when a DCC System flag has been applied.

The CSPs should be aware of the communicative status of Devices as this information may impact on their processes when retrieving information from the Communications Hub. During solution development the CSPs advised that it is unlikely their processes will be impacted due to requirement 4, as they are not directly involved with retrieval of consumption data. Impacts on the CSPs will be investigated during the DCC Impact Assessments.

2.7 Requirement 6: The DCC to amend any reporting for which the success/failure of Service Requests relating to energy consumption is a metric to allow for exceptions where communications have been reduced due to consumer choice.

A full list of the affected reporting will be investigated as part of the DCC's Preliminary Assessment and developed during the Refinement Process. This requirement will need to consider whether the reporting in question requires exceptions for specific Service Requests, related business processes or for the Devices themselves.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
CoS	Change of Supplier
CoT	Change of Tenancy
CSP	Communications Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications
SRV	Service Reference Variant
WAN	Wide Area Network