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Stage 02: Working Group Consultation Responses

SECMP0002 'Add new Command to reset Debt Registers'

About this document

This document contains the collated responses to the SECMP0002 Working Group Consultation (WGC). The Working Group (WG) will review these responses and consider them as part of the solution development for this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Sasha Townsend on 020 7191 1534 or email SEC.Change@gemserv.com.

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
▶ 04	Final Modification Report

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Question 1

Q1: Do you agree with the issue, as outlined in the Draft Modification Report?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	We agree that it is not optimal for a User to have to utilise multiple commands in order to eradicate the debt that is displayed to the Consumer on a Smart Metering System. This does create a risk that incorrect data may be displayed.
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	SSEN agrees that the issue is as outlined in the draft modification report.
E.ON	Large Supplier	Yes	No rationale provided.
Npower	Large Supplier	Yes	No rationale provided.
SSE	Large Supplier	Yes	Yes, the absence of a reset debt command has necessitated the use of workarounds that are cumbersome and inflexible.

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Question 2

Q2: Do you have any comments on the proposed solution?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	No	The proposed solution would appear to address the issue fully.
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	SSEN agrees that the solution is correctly aligned with the resolution of the issue.
E.ON	Large Supplier	Yes	<p>The proposal of any optional functionality presents a level of potential discord in consumer journeys across Suppliers (with the potential to impact churn), and creates the potential for additional complexity in a world which will already be convoluted with disparate Operational Processes for SMETS1 and SMETS2.</p> <p>This proposal specifically allows the potential for 'opting-in' Users to incur ongoing costs for additional operational processes (use of new Service Requests (SRs)), because of the need to maintain this functionality alongside the existing processes for any inherited meters which are not functionally capable of utilising these SRs. If Service Requests become an audit requirement (DCC Capacity) in BAU, there could be additional negative consequences for Suppliers opting to use the proposed solution, where errors are made in the use of</p>

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			SRs across different Devices. Such a solution therefore appears to be a little impractical or risk-inherent, when considering sustainability.
Npower	Large Supplier	Yes	We are highly supportive of the solution as we believe it have a positive impact on Suppliers, as they would be able to make more efficient use of the DCC system by replacing two commands with one. This will reduce the traffic across Supplier and DCC systems, reduce the risk of failures. Also there should be a positive customer impact as the proposed new one command would minimise the chances of misleading the customer.
SSE	Large Supplier	Yes	SSE are keen to see a more efficient arrangement for debt resets than what is currently in place, and the proposed solution will facilitate this. However, we do believe the solution could be optimised – by only being able to re-set a single meter balance at a time there could in fact be an increase in DCC traffic.

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Question 3

Q3: Do you believe that the draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	Yes	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	We have not identified any issues in regards to the draft legal text changes.
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	No rationale provided.
E.ON	Large Supplier	-	We are not comfortable commenting on the Legal Text in the absence of the DCC User Interface Specification and Message Mapping Catalogue drafting.
Npower	Large Supplier	Yes	No rationale provided.
SSE	Large Supplier	Yes	We see no issues with the proposed text, but we await the full legal text before we're able to fully endorse it.

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Question 4

Q4: Will your organisation be impacted due the implementation of this modification? If so, please indicate how much lead time your organisation requires to implement it from approval of the change.

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	Any change to the DCC User Interface will require a minimum 12 month lead time before implementation.
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	No	No rationale provided.
E.ON	Large Supplier	Yes	If we chose to use this solution it is likely that we will encounter costs in the absence of SMETS iterations being detailed in Industry Data Flows. If we were to implement this solution we would require less lead time than has been requested by the DCC.
Npower	Large Supplier	Yes	Yes. We would expect a 12 month lead time, as this will involve system change to implement.
SSE	Large Supplier	No	The implementation of this modification would not impact us, as we will only be impacted if we elect to use the new SR. We would expect lead time to follow SEC release management. If

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			implemented and we decide to use the new SR, our lead time would vary depending on the level of implementation.
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Question 5

Q5: Will your organisation incur any costs due to the implementation of this modification?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	<p>If this modification were to be implemented as part of a new release of the DCC User Interface Specification we would need to upgrade our systems to that new version at some point. We are not able to quantify these costs at this point; however they are likely to be significant.</p> <p>We would also incur costs from our meter manufacturers who would need to develop the changes to ESME and GSME to include the new functionality delivered by this modification.</p>
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	Once implemented, SSEN DCC charge will reflect the overall DCC cost of running the DCC Eco System
E.ON	Large Supplier	Yes	<p>There will be a financial impact regardless of whether or not we chose to use this solution (DCC costs of implementation).</p> <p>In addition to our share of the implementation costs, if we decided to use this solution we would incur significant costs for the design, build, and testing of our own solution, as well as the costs of maintaining a separate operational process.</p>

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Npower	Large Supplier	Yes	Yes, as this is a new command this will require a new DUIS schema to be implemented as well as changes to our command sequences.
SSE	Large Supplier	No	The implementation of this modification would not result in costs for us, but if we do elect to use the new SR we will incur development costs.

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Question 6

Q6: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you believe that SECMP0002 should be approved?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	Yes	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	No	<p>We do not believe that the costs associated with this modification can be justified by the marginal benefits to be gained.</p> <p>As noted in the consultation, in the absence of a single command to reset debt on a smart meter we have developed a workaround process using multiple commands to achieve the same outcome. While there is a risk that this workaround might not work in some circumstances, we do not have any evidence that this is the case, or that the level of failure would be sufficient to justify the costs of making this change.</p> <p>At this moment in time, even if this modification were to be made, we would not use the new Service Request as we have not identified any issues with the current process that would justify implementing a change to our business processes.</p>
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	SSEN has expressed its ongoing concern at the high cost of any DCC modification. SSEN is disappointed that some costs do not seem to be coming down such as the testing, despite the SECAS effort to influence them..

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E.ON	Large Supplier	No	<p>We do not support the implementation of SECMP0002 because it has no evident cost-benefit case. The costs that DCC have attributed to this modification surpass our understanding entirely; we cannot see that there is any justification that would warrant such a cost to achieve an outcome which is already achievable (albeit via a different method).</p> <p>We would be interested to understand the details of how DCC reached the extortionate price tag of £2.5m, for what ought to be a relatively small and simplistic change. It ought to be acknowledged by DCC that costs such as these (with consideration to overall Programme costs) are likely to become a disincentive for raising Modifications. As a consequence such costs may be perceived as a) becoming a barrier to innovation within the market, and b) a failure to uphold the objectives of the SEC, both of which seemingly contravene requirements of the DCC Licence</p>
Npower	Large Supplier	Yes	<p>Yes, we believe the new command will minimise the risks in misleading the customer, and provide a more accurate representation of their debt position on the meter.</p>
SSE	Large Supplier	Yes	<p>The benefits and impacts to us depend upon whether we choose to use the new SR. While the cost to DCC to deliver the modification is considerable, the modification is worthwhile as it provides parties the option for future development. Due to the time constraints of developing modifications, we have had to arrange a workaround to address this issue in the meantime, and there is a risk that adopting a new solution in the future will require parties to redesign processes once again.</p>

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Question 7

Q7: Do you agree that the proposed solution better facilitates the SEC Objectives?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	Yes	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	<p>We agree that the solution would facilitate objectives (a) and (c) as it would support device interoperability and ensure that their Smart Metering Systems provide accurate information to consumers, specifically in regard to debt.</p> <p>However it is not clear that these objectives are not being met by the current baseline – as noted previously we do not as yet have any evidence that the current process for re-setting debt on smart meters does not work, or creates any material issues. It is not therefore evident that the modification would better facilitate those objectives than the current baseline. Given the significant cost associated with this change we do not believe that there is currently a clear business case for making this change.</p>
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	SSEN agrees that both the SEC Objectives A and C are achieved.
E.ON	Large Supplier	Yes	The implementation of this solution would bring efficiency to the current process by which a zero balance is achieved on the

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			<p>registers in question, and therefore this modification arguably facilitates SEC Objective (a).</p> <p>We do not believe a directional correlation between debt information and energy management has been empirically established, we do not therefore agree that this modification will better facilitate SEC Objective C (we acknowledge that it might).</p>
Npower	Large Supplier	Yes	<p>We agree with the proposal because of the following reasons:</p> <p>This Modification Proposal will better facilitate:</p> <p>Objective a) because:</p> <ul style="list-style-type: none"> • Suppliers would be able to make more efficient use of the DCC system by replacing two commands with one. This will reduce the traffic across Supplier and DCC systems, reduce the risk of failures. <p>Objective c) because:</p> <ul style="list-style-type: none"> • in sending two commands to perform one 'logical' operation there is a chance that either command could fail or the customer could be looking at their Smart Metering System at the time that these commands were being applied and consequently see misleading information. The proposed new command would minimise the chances of misleading the customer.
SSE	Large Supplier	Yes	<p>We believe the proposal could better facilitate objectives A and C if the solution were to be optimised as per our response to Q2</p>

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Question 8

Q8: Do you have any additional benefit and/or drawbacks for the proposed solution?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	No	Ultimately the main drawback of the proposed solution is the implementation costs and timescales – we do not believe that the benefits of this change justify the significant costs noted in the consultation.
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	No	No rationale provided.
E.ON	Large Supplier	No	Not in addition to the aforementioned.
Npower	Large Supplier	No	No rationale provided.
SSE	Large Supplier	Yes	If the solution were to allow for one SR execution to update all three debt registers, as in the existing DUIS Service Request 2.3 'Update Debt', the solution would be more efficient. By designing this solution with one reset at a time we expect that the result would be a possible increase in DCC traffic.

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Question 9

Q9: Do you agree with the recommended implementation date?			
Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	Yes	No rationale provided.
EDF Energy Customers Ltd	Large Supplier	Yes	We agree that, if the modification is approved, that the recommended implementation date is appropriate
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	SSEN thinks that the implementation date, subject to approval, is achievable although perhaps with knowledge of the ongoing issue experienced by DCC is still challenging.
E.ON	Large Supplier	No	We note the suggested date accords with Policies which are currently being consulted upon, but we do not believe that a period of just shy of 3years and four months is a suitable precedence to set for the implementation of modifications if this were to be approved.
Npower	Large Supplier	Yes	No rationale provided.
SSE	Large Supplier	Yes	As stated, the solution's impacts depend upon whether parties choose to adopt the new SR, therefore the implementation date is not problematic.

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Question 10

Q10: Do you have any other comments on the solution?

Party Name	Party Category	Yes/No	Comments
One Wales Energy - Un Ynni Cymru Ltd	Small Supplier	No	No further comments.
EDF Energy Customers Ltd	Large Supplier	Yes	<p>While we agree with the principle of this change the functionality that this is seeking to introduce really should have been part of the original baseline functionality of smart metering systems. As a result of this not being the case we and other parties have developed workarounds which, while sub-optimal, have not yet been proven to not work.</p> <p>While this is in principle a sensible change, once again the costs for changing the DCC systems are significantly high and we do not believe that they can be justified by the benefits to be gained by making this change. We remain concerned that the cost of making changes to the DCC systems means that sensible changes like this one are likely to be rejected without a robust business case, and industry will continue to rely on sub-optimal processes because it is too expensive to enhance them.</p>
Scottish Hydro Electric Power Distribution PLC	Electricity Networks	Yes	Proper consumer engagement of Smart Metering benefit is in the heart of the SMIP. This modification is fully engaged in delivering the right outcome.

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E.ON	Large Supplier	No	No further comments.
Npower	Large Supplier	No	No further comments.
SSE	Large Supplier	No	No, as above we are in support of the solution and its aims but do recognise that its efficiency could be optimised.