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## Stage 04: Modification Report Consultation Responses

# SECMP0002 'Add New Command to Reset Debt Registers'

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

## About this document

This document contains the collated responses to the SECMP0002 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact David Kemp on 020 7090 7762 or email [SEC.Change@gemserv.com](mailto:SEC.Change@gemserv.com).

SECMP0002

Modification Report  
Consultation  
Response Form

10<sup>th</sup> April 2018

Version 2.0

Page 1 of 13

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## Content

Summary of Responses	3
Question 1	4
Question 2	6
Question 3	9
Question 4	10
Question 5	12

## About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0002.

The Change Board will consider these responses at its meeting on 18<sup>th</sup> April 2018, where it will determine whether SECMP0002 should be approved or rejected by the Authority.

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 2 of 13

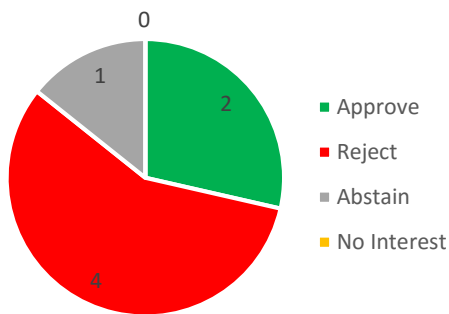
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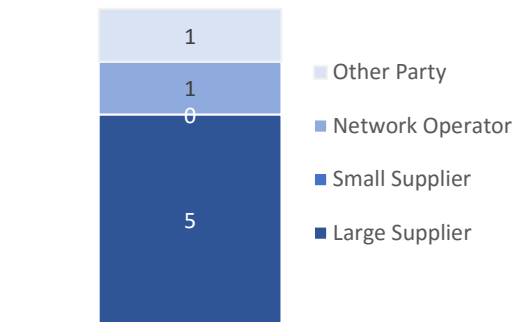
## Summary of Responses

This section summarises the responses received to the SECMP0002 MRC.

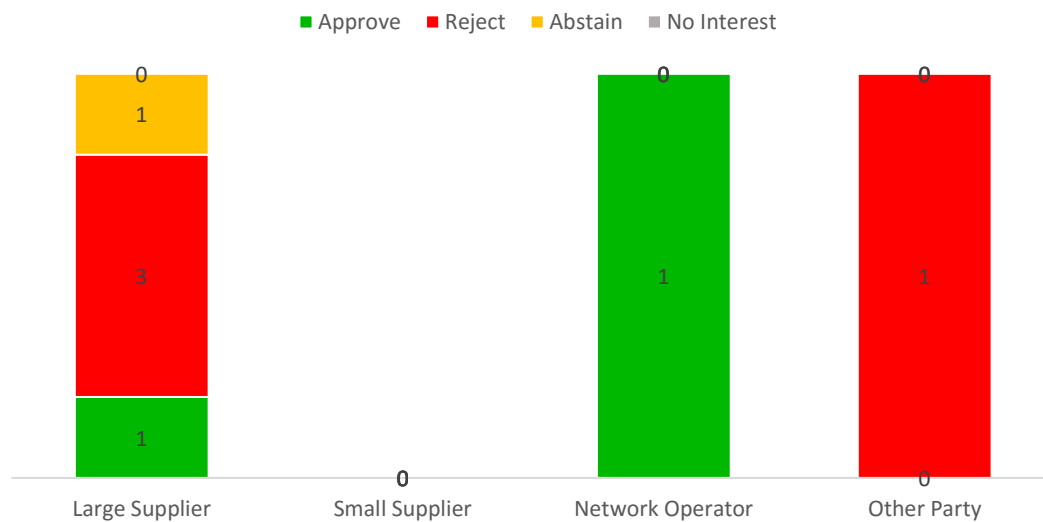
### Respondents Views



### Number of Respondents (by Party Type)



### Views by Party Type



SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 3 of 13

This document is  
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## Question 1

**Q1: Do you agree that the proposed solution better facilitates the SEC Objectives?**

Party Name	Party Category	Yes/No/ Neutral	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN agrees that both the SEC Objectives A and C are achieved.
E.ON	Large Supplier	Yes	<p>The implementation of this solution would bring efficiency to the current process by which a zero balance is achieved on the 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>
Utilita Energy	Large Supplier	Support	We support the Working Groups view that this modification better facilitates SEC Objective A by bringing in efficiencies to how a zero balance is achieved on a meter register.
EDF Energy	Large Supplier	No	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.

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 4 of 13

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			However it is not clear that these objectives are not being met by the current baseline – 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.
SSE	Large Supplier	Yes	We believe the proposal will better facilitate objectives A and C.
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	We agree that SECMP0002 meets with Objectives A and C.
TMA Data Management LTD	Other Party	Yes	-

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 5 of 13

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## Question 2

**Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0002 should be approved?**

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	<p>SSEN fully expect the DCC to have influence the testing costs and this should be reflected.</p> <p>SSEN is disappointed that no DCC costs were made available during this consultation process.</p> <p>However SSEN agrees that SECMP002 should be approved (see Q5)</p>
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 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 theses (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>

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 6 of 13

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Utilita Energy	Large Supplier	No	<p>We cannot support this modification due to the extremely high costs provided again by the DCC. It is also worth noting these costs could be even higher than stated as the costs are only estimates. We also believe the costs are not transparent from the information provided in the Modification Report and therefore are struggling to understand where costs have come from to reach as high as they do for the build and test phase. We note on page 16 (DCC Costs) the report states:</p> <p><i>“One Large Supplier Party also stated that they were interested to understand further details of how the DCC calculated the implementation costs. Noting that the modification seemed to be a relatively minor change to the DCC Systems. SECAS requested further information from the DCC on behalf of the WG prior to the DMR being issued to the SEC Panel. The Modification Report will be updated with any further information that is provided.”</i></p> <p>We are unclear where exactly this further information has been provided and would welcome this information?</p>
EDF Energy	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>In the absence of a single command to reset debt on a smart meter Users 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>
SSE	Large Supplier	Yes	<p>While we made comments on the effectiveness of this proposal in the working group consultation, we appreciate that these</p>

SECMPO002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 7 of 13

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			were noted by the WG. There is no cost associated with this modification but it is clear that we are not the only party to have introduced workarounds, which diminishes the cost benefit overall.
ScottishPower Energy Retail Ltd.	Large Supplier	Neutral	<p>We agree that the absence of a Command to reset debt registers is problematic. However, we also note that SECMP0002 is unlikely to be implemented before November 2019, and are of the view that Users will almost certainly have implemented their own solutions in the interim.</p> <p>We are also concerned about the high cost to implement SECMP0002.</p> <p>Therefore, while we would still like to see SECMP0002 implemented, we do not regard the requirement as pressing, and would prefer that a most cost efficient implementation method is sought: e.g. delivery as opportune.</p>
TMA Data Management LTD	Other Party	No	Once again, we are forced to reject a modification proposal, we would otherwise support due to the extortionate costs of updating the DCC system.

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 8 of 13

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### Question 3

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

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	-
E.ON	Large Supplier	Yes	-
Utilita Energy	Large Supplier	Yes	We have no specific comments on the draft legal text.
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text.
SSE	Large Supplier	Yes	-
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	-
TMA Data Management LTD	Other Party	Yes	-

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 9 of 13

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## Question 4

### Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	Although SSEN agrees with the implementation data, SSEN is aware that DCC constraints can impact the delivery date.
E.ON	Large Supplier	No	We do not believe this modification should be implemented. We note however that the suggested date accords with Release Management Policies currently subject to consultation, but we do not believe that a period of just shy of 3.5 years is a suitable precedence to set for the implementation of modifications if this were to be approved
Utilita Energy	Large Supplier	Yes	If the solution is approved we believe the implementation date is acceptable.
EDF Energy	Large Supplier	Yes	We agree that, if the modification is approved, that the recommended implementation date is appropriate.
SSE	Large Supplier	Yes	As the solution's impacts depend upon whether parties adopt the new SR, we do not see any issues with the implementation date.
ScottishPower Energy Retail Ltd.	Large Supplier	Neutral	Please refer to our response to Q2.

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 10 of 13

This document is  
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TMA Data Management LTD	Other Party	Yes	-
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## Question 5

**Q5: Please provide any further comments you have on SECMP0002.**

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	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.
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 SRs across different Devices. Such a solution therefore appears to be a little impractical or risk-inherent, when considering sustainability.</p>
Utilita Energy	Large Supplier	Yes	DCC costs are acting as a barrier for industry change and process efficiencies, this is a great cause for concern. This is not the first modification that we have in principle supported

SECMP0002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 12 of 13

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			<p>and would have liked to have seen implemented if costs were not so unreasonably high and lacked transparency.</p> <p>We would encourage SECAS to request for more detailed breakdown of DCC costs to enable us and other SEC parties to understand where costs are coming from.</p>
EDF Energy	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>
SSE	Large Supplier	Yes	<p>As stated in the Working Group Consultation, we are in support of the solution and its aims but believe that its efficiency could be optimised.</p>
ScottishPower Energy Retail Ltd.	Large Supplier	No	-
TMA Data Management LTD	Other Party	Yes	<p>We are disappointed that DCC costs are once again a barrier to improving the way the Smart Metering Industry works.</p>

SECMPO002

Modification Report  
Consultation  
Responses

10<sup>th</sup> April 2018

Version 2.0

Page 13 of 13

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