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Stage 02: Working Group Consultation Responses

SECMP0023 'Correct Units of Measure for Uncontrolled Gas Flow Rate'

What stage is this document in the process?

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

About this document

This document contains the collated responses to the SECMP0023 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 Harry Jones on 020 7090 7755 or email SEC.Change@gemserv.com.

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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
Npower	Large Supplier	Yes	We do agree with the issue outlined in the Modification Report.
TMA Data Management Ltd.	Other	Neutral	-
Centrica	Large Supplier	Yes	Yes. The current units used for UGFR are inappropriate.
EDF Energy Ltd.	Large Supplier	Yes	We agree that the current functionality for setting the Uncontrolled Gas Flow Rate (UGFR) is not fit for purpose and should be corrected. While the UGFR may not be regarded as a safety critical feature for gas smart meters, we believe that it is a useful additional control to be applied when consumers attempt to re-enable they gas supply. It should therefore be ensured that it is able to operate as intended, and support the varying needs of different consumers and premises.
SSE	Large Supplier	Yes	The current arrangement is insufficient for the SEC's requirements; we are in support of addressing this defect so that there is no longer a need for workarounds.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	-

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Question 2

Q2: Do you have any comments on the proposed solution?			
Party Name	Party Category	Yes/No	Comments
Npower	Large Supplier	Yes	We support the purpose and solution for the change and its implementation date. It does impact our systems, so we would require a 6 month lead time from approval.
TMA Data Management Ltd.	Other	Neutral	XXXXX
Centrica	Large Supplier	No	No, apart from it appears fit for purpose and we are not aware of a suitable / better alternative.
EDF Energy Ltd.	Large Supplier	Yes	<p>We agree with the detail of the proposed solution in terms of the changes to the relevant technical specifications and interface documents. We are however concerned about how the UGFR will be managed for devices installed prior to this change being made.</p> <p>We do not believe that it would be appropriate for this change to be mandated for devices that have been installed before this change comes into effect. However, it should be ensured that, where possible, this change is made in such a way that there are as few barriers as possible to Suppliers upgrading their GSMEs to include this functionality. We believe that as many meters as possible should be able to have their UGFR set appropriately, minimising the risk of unnecessary device replacement.</p>

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			<p>We also believe that steps should be taken to mitigate the current risk that exists around UGFR in the period until this change can be implemented. It is noted in the DMR that a workaround exists that means that Meter Manufacturers will pre-set the UGFR rate to a suitable value at manufacture. It would be useful to seek confirmation that this is being done by all Meter Manufacturers, and to understand what value(s) are currently being used.</p> <p>It is also noted that 'Gas Supplier Users will not set UGFR by sending SRV 6.7 'Update Device Configuration (Gas Flow)' – which does not seem on its own to be a strong enough control. It should be considered whether either:</p> <ul style="list-style-type: none"> • The DCC can suspend the use of SRV 6.7 entirely for all DCC Users until this change can be made. • The DCC can apply value based anomaly detection to the values of UGFR to prevent incorrect values (i.e. 0 or 1 or greater) from being set on GSMEs.
SSE	Large Supplier	No	-
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	<p>We are unclear as to why the proposal looks to include an additional Uncontrolled Gas Flow Rate Decimal field in the service request, rather than just changing the data type of the existing Uncontrolled Gas Flow Rate field to allow that field to be populated with a decimal value if required.</p> <p>Then the DCC could simply reject this service request if it is sent to a device that is "certified to a GBCS version prior to vn.0".</p>

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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
Npower	Large Supplier	Yes	Yes.
TMA Data Management Ltd.	Other	Yes	-
Centrica	Large Supplier	Yes	-
EDF Energy Ltd.	Large Supplier	Yes	We have no comments to make on the legal text.
SSE	Large Supplier	Yes	-
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	As explained in our response to Q2, we are not persuaded that the proposed solution is necessarily the right one.

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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
Npower	Large Supplier	Yes	Although we support the purpose and solution for the change and its implementation date, this change does impact our systems. Therefore we would require a 6 month lead time from approval to implementation.
TMA Data Management Ltd.	Other	Yes	As DUIS SR 6.7 is modified, our system will need to be modified. We would require a 6 months lead time.
Centrica	Large Supplier	Yes	Yes. We will need to make some minor changes to accommodate use of SR6.7. As a minor change this would require <6 months' notice and therefore should not impact on the proposed implementation timetable.
EDF Energy Ltd.	Large Supplier	Yes	Any change to implement a new version of DUIS is likely to take at least 12 months to implement. It will also take a similar period to ensure that this change is incorporated into our procurement specifications for new devices.
SSE	Large Supplier	No	-
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We would require a lead time of perhaps 6 months to implement.

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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
Npower	Large Supplier	Yes	We will incur costs due to the implementation of this modification.
TMA Data Management Ltd.	Other	Yes	Development, testing and implementation costs, estimated to be low.
Centrica	Large Supplier	No	-
EDF Energy 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. We assume that any such release would include multiple changes – it would not be cost effective to make this change on a standalone basis.</p> <p>We would also incur costs from our meter manufacturers who would need to develop the changes to GSME to include the new functionality delivered by this modification. We do not expect these costs to be significant.</p>
SSE	Large Supplier	No	-

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<p>Scottish Power Energy Retail Ltd.</p>	<p>Large Supplier</p>	<p>Yes</p>	<p>If implemented SECMP0023 would have an impact on our IT solution, necessitating development work.</p> <p>We would also anticipate the DCC costs subsequently becoming manifest in its charging statement.</p>
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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 SECMP0023 should be approved?

Party Name	Party Category	Yes/No	Comments
Npower	Large Supplier	Yes	We believe that even with considering the associated costs of this Modification, it should still be approved. This is because the DCC's costs for this have reduced dramatically to just over £400k.
TMA Data Management Ltd.	Other	Yes	-
Centrica	Large Supplier	Yes	Yes. It provides an effective solution to address the issue identified.
EDF Energy Ltd.	Large Supplier	Yes	We believe that the UGFR provides a useful additional health and safety related control for GSMEs, and that it should be ensured that this functionality is made fit for purpose.
SSE	Large Supplier	Yes	As SSE do not currently use SR 6.7 this modification will not cause any detrimental impacts to us. We are nonetheless conscious of this issue as SR 6.7 is a functionality we could elect to use.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	-

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Question 7

Q7: Do you agree that the [proposed/alternative] solution better facilitates the SEC Objectives?

Party Name	Party Category	Yes/No	Comments
Npower	Large Supplier	Yes	We have not changed our mind since raising this proposal, and still believe that the current command is unusable and therefore this new command with far greater granularity better facilitates the effective installation and operation of a gas smart meter.
TMA Data Management Ltd.	Other	Yes	-
Centrica	Large Supplier	Yes	Yes, as documented in the DMR.
EDF Energy Ltd.	Large Supplier	Yes	We agree with the Working Group members that SECMP0023 better facilitates General SEC Objective (a) because Gas Suppliers will be able to set the UGFR value to an appropriate level of granularity. This will facilitate the efficient provision and operation of GSME as the modification allows the UGFR functionality to be utilised in the capacity it was originally established for.
SSE	Large Supplier	Yes	This solution better facilitates SEC objective A as it will improve the efficiency of smart metering systems.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We agree that SECMP0023 better facilitates the first General SEC Objective, which is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart

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			Metering Systems at Energy Consumers' premises within Great Britain.
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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
Npower	Large Supplier	Yes	As the DCC is effectively re-using SR 6.7 then this provides additional benefit to suppliers as they can continue to send the command in the old format to meters that do not support the more granular setting.
TMA Data Management Ltd.	Other	No	-
Centrica	Large Supplier	No	-
EDF Energy Ltd.	Large Supplier	No	We agree with the Working Group's assessment of the benefits and drawbacks of the proposed solution
SSE	Large Supplier	No	-
Scottish Power Energy Retail Ltd.	Large Supplier	No	-

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Question 9

Q9: Do you agree with the recommended implementation date?			
Party Name	Party Category	Yes/No	Comments
Npower	Large Supplier	Yes	-
TMA Data Management Ltd.	Other	Yes	Both the 27th June 2019, (if a decision to approve is made by the 27th June 2018) and the 7th November 2019,(if a decision to approve is made after the 27th June 2018 but on or before the 7th November 2018) provide us with adequate lead time.
Centrica	Large Supplier	Yes	-
EDF Energy Ltd.	Large Supplier	Yes	We believe that this change should be made as soon as possible, and at the latest as part of the June 2019 SEC Release.
SSE	Large Supplier	Yes	-
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	-

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Question 10

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

Party Name	Party Category	Yes/No	Comments
Npower	Large Supplier	No	-
TMA Data Management Ltd.	Other	No	-
Centrica	Large Supplier	Yes	There will be an impact on gas meter manufacturers from this modification and they will need time to implement. We have not included in our response any assessment or input from meter manufacturers. We have assumed manufacturers will respond directly to this consultation and, if they have any, they will highlight any concerns
EDF Energy Ltd.	Large Supplier	No	We have no additional comments.
SSE	Large Supplier	Yes	SSE would elect to use SR 6.7 once the proposed changes to UGFR values are progressed and implemented.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We agree that SECMP0023 better facilitates the first General SEC Objective, which is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

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