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Stage 04: Modification Report Consultation Responses

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

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 SECMP0023 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 Harry Jones on 020 7081 3345 or email SEC.Change@gemserv.com.

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Working Group Consultation Response Form

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0023.

The Change Board will consider these responses at its meeting on 23rd May 2018, where it will determine whether SECMP0023 should be approved by the Authority.

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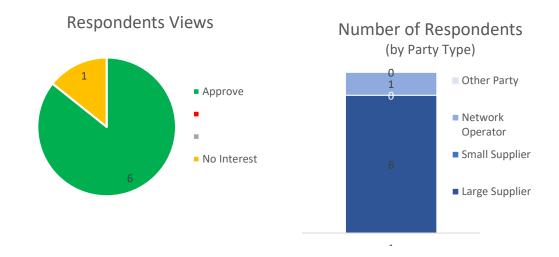




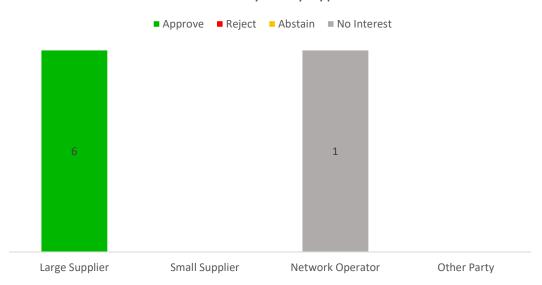


Summary of Responses

This section summarises the responses received to the SECMP0023 MRC.



Views by Party Type



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Q1: Do you agree that the [proposed/alternative] solution better facilitates the SEC Objectives?

Party Name	Party Category	Yes/No/ Neutral	Comments
Centrica plc	Large Supplier	Yes	Yes, as documented in the Modification Report.
SSEN	Network Operator	n/a	n/a
E.ON Energy Solutions	Large Supplier	Yes	In allowing Suppliers to set the Uncontrolled Gas Flow Rate (UGFR) to an appropriate level, we believe that this Modification better facilitates the efficient operation of Gas Smart Meters and consequently objective a.
EDF Energy	Large Supplier	Yes	We agree 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.
npower	Large Supplier	Yes	As the proposer of this modification we believe that this will better facilitate the first General SEC Objective:- the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain Gas Suppliers will be able to set the UGFR value to an appropriate level of granularity. Therefore this modification will

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			achieve the efficient provision and operation of GSME. The modification will allow the UGFR functionality to be utilised as originally intended.
Utility Warehouse Ltd.	Large Supplier	Yes	We believe this modification better facilitate against SEC Objective (a) as this will allow Gas Suppliers to be able to set an appropriate UGFR value on a GSME and allow this function to be utilised in the way originally intended.
SSE	Large Supplier	Yes	We agree that the proposed solution better facilitates SEC Objective (a) as it allows for greater flexibility in the UGFR functionality, supporting the efficient provision and operation of the Gas Smart Meter.

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Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP00XX should be approved?

Party Name	Party Category	Yes/No	Comments
Centrica plc	Large Supplier	Yes	The modification proposal promotes a suitable to solution the issue identified.
SSEN	Network Operator	n/a	n/a
E.ON Energy Solutions	Large Supplier	Yes	n/a
EDF Energy	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. We do not believe that the status quo is appropriate, and no more cost effective solution has been identified.
npower	Large Supplier	Yes	Npower raised this modification in order to allow the command to do what it is supposed to do! Being able to set values that are more appropriate will make them more meaningful. Implementing this change would therefore make the UGFR functionality able to fully deliver the purpose it was established for.



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Utility Warehouse Ltd.	Large Supplier	Yes	Yes, we believe that SECMP0023 should be approved and the proposed costs of implementation are proportionate to justify implementation.
SSE	Large Supplier	Yes	We believe that this provides an effective solution to the issue identified and supports the potential for future innovation with the greater granularity.

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

Party Name	Party Category	Yes/No	Comments
Centrica plc	Large Supplier	Yes	
SSEN	Network Operator	n/a	n/a
E.ON Energy Solutions	Large Supplier	Yes	n/a
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text.
npower	Large Supplier	Yes	
Utility Warehouse Ltd.	Large Supplier	Yes	Yes, we support the proposed drafting.
SSE	Large Supplier	Yes	

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Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Centrica plc	Large Supplier	Yes	YES
SSEN	Network Operator	n/a	n/a
E.ON Energy Solutions	Large Supplier	Yes	n/a
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date, but would note that the size of this change would not justify implementing this change to GBCS/DUIS on its own; this should form part of a wider release.
npower	Large Supplier	Yes	
Utility Warehouse Ltd.	Large Supplier	Yes	Yes, although there appears to be an error in the Modification Report Consultation in this section. We believe this should be 27 th June 2019, if a decision to approve is made by 27 th June 2018 or 7 th November 2019, if a decision to approve is made after 27 th June 2018 but before 7 th November 2018. The MRC currently says:

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			• 27th June 2019, if a decision to approve is made <u>by 27th Junes 2018</u> ; or • 7th November 2019, if a decision to approved is made <u>after 27th May 2018</u> but before 7th November 2018.
			This provides ambiguity if a decision to approve was made between 27 th May 2018 and 27 th June 2018.
SSE	Large Supplier	Yes	We agree with the proposed implementation and the 12 month lead time, from the date of approval, to implement any changes required to our Party Interfacing Systems and processes.

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Q5: Please provide any other comments you may have on this modification.

Party Name	Party Category	Yes/No	Comments
Centrica plc	Large Supplier	Yes	n/a
SSEN	Network Operator	Yes	No Interest
E.ON Energy Solutions	Large Supplier	Yes	In our view, it would have been more appropriate that the proposals noted by Scottish Power in the Working Group (WG) consultation be investigated by the WG, before having the Final Modification Report Consultation for SECMP0023 as we see merit in their suggestions. We acknowledge however that the provision of another DCC Assessment for this Modification would have slowed the change process considerably and we therefore support the Modification as is.
EDF Energy	Large Supplier	Yes	We have no additional comments.
npower	Large Supplier	No	
Utility Warehouse Ltd.	Large Supplier	No	
SSE	Large Supplier	Yes	No further comments.



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