Smart Energy Code

SEC
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Stage 02: Working Group Consultation Responses

What stage is this document in the process?

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

SECMP0025 'Electricity Network Party Access to Load Switching Information'

About this document

This document contains the collated responses to the SECMP0025 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 Nikki Olomo on 0207 081 3095 or email SEC.Change@gemserv.com.

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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	Comments
Western Power Distribution	Network Party	Yes	This modification better facilitates SEC Objective (e) as allowing Electricity Distribution Network Operators access to the load switching information will help ensure that a secure and sustainable supply of electricity can be delivered to consumers.
SSEN	Network Party	Yes	SSEN believes this modification will support the nascent DSO capability as part of integral ability to shape the future energy sector.
Electricity North West Limited	Network Party	Yes	SECMP0025 better facilitates the SEC Objective (e), which is *"to facilitate such innovation in the design and operation of Energy Networks, as this solution will better contribute to the delivery of a secure and sustainable Supply of Energy".*
EDF Energy	Large Supplier	Neutral	While it would appear that the proposed solution could better facilitate SEC Objective (e) as noted in the DMR there needs to be a clearer through line drawn between improved access to switching information and facilitate innovation in the design and operation of Energy Network. The benefits of the DMR are quite generic and not solely delivered by the implementation of this Modification – we believe that there needs to be a clearer articulation of the direct benefits of making this specific change.

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Question 2

Q2: Will your organisation be impacted due the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	As an Electricity Distribution Network Operator, we will be impacted by the implementation of this modification. We will need to change our systems to deal with the new Service Request Variants and Alerts and also analyse the information that this will provide. Allowing DNOs access to the ALCS/HCALCS information will mean that we can monitor what is happening on our low voltage networks more accurately. As a result of this, we will be better informed when making decisions with regards to network management and reinforcement, ensuring that works to the network (which can be costly) are only completed when absolutely necessary. The information gained will also aid us in developing innovative solutions to assist with planning, operation and maintenance of the network and help protect our assets.
SSEN	Network Party	Yes	SSEN will need to amend its adapter and back end system to capitalise on this change.
Electricity North West Limited	Network Party	Yes	Yes, Electricity North West is an Electricity Distributor and so will have the opportunity to access event logs and data as well as potentially receiving alerts.
EDF Energy	Large Supplier	Yes	We would need to ensure that devices that we are procure, install and maintain are compliant with the versions of SMETS and GBCS that the new functionality is included in.

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			We do not believe that the Service Request changes will have an impact on Suppliers as they do not change the format of these SRs, just the parties that are able to use those SRs. It is assumed that this change would not the only change included in a new version of DUIS, if this were to be the case this would increase the costs associated with this specific change which are usually shared across multiple changes that form part of a new release.

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Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	Western Power Distribution estimate that their cost to implement this modification would be between £20,000 and £30,000. The majority of this cost is system development and testing in relation to the new Service Request Variants that we will have access to and the new DCC Alerts that will be received.
SSEN	Network Party	Yes	SSEN will need to invest in IT system to make sense of these SRV responses and alerts.
Electricity North West Limited	Network Party	Neutral	
EDF Energy	Large Supplier	Yes	We believe that there would be a cost for ensuring that our devices are compliant with the new versions of SMETS and GBCS that the new functionality is included in. At this stage we would not be able to identify the specific costs that would be incurred as a result of this change. It is assumed that this change would not the only change included in a new version of SMETS and GBCS, if this were to be the case this would increase the costs associated with this specific change which are usually shared across multiple changes that form part of a new version.

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Question 4

Q4: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agreed that SECMP0025 should be approved?

Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	We believe that this modification should be approved as the benefits far outweigh the costs. The information that DNOs will have access to, will mean that we will be better informed when making decisions with regards to network management and reinforcement, ensuring that works to the network (which can be costly) are only completed when absolutely necessary. The information will also help ensure that the electricity supply is secure and sustainable, especially now we are in a world that is ever changing and challenging demand and generation balance.
SSEN	Network Party	Yes	SSEN is the proposer and SSEN views have not changed since.
Electricity North West Limited	Network Party	Yes	Although we remain concerned at the large DCC costs for implementation.
EDF Energy	Large Supplier	No	At this stage we do not feel that the benefits ofSECMP0025 have been clearly articulated or quantified in a way that would enable us to support this change. As has been with other changes that have recently been voted on by the Change Board it is not enough for a proposal merely to facilitate the SEC Objectives; given the scale of the costs involves in any change to the DCC it has to be demonstrated that the benefits outweigh the costs. Even though the indicative costs associated with this change are lower than many of those that we have seen before, the same approach should still apply – changes should not be made purely on the basis they

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			don't cost much, the costs of any system change will ultimately be borne by consumers and need to be fully justified.

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Question 5

Q5: Do you believe that the draft legal text changes deliver the intention of the modification?			
Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	
SSEN	Network Party	Yes	SSEN believes that the legal text delivers the intention of the modification.
Electricity North West Limited	Network Party	Yes	
EDF Energy	Large Supplier	Yes	We have not identified any issues with the draft legal text changes.

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Question 6

Q6:) Do you think the Path Type of the Modification should be changed from Path 2: Authority Determination to Path 3: Self-Governance**?**			
Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	The modification has developed since its original proposal and as there is no material impact on consumers, competition or security of supply, we feel that this modification should now be progressed as a Path 3: Self-Governance.
SSEN	Network Party	No	SSEN understand why DCC is proposing for this modification to be changed to Path 3. However, only Path2 criteria are applicable to this modification and we also need to ensure that the Authority have the ability to determine the outcome.
Electricity North West Limited	Network Party	No	Ofgem oversight and approval of this change proposal is appropriate.
EDF Energy	Large Supplier	Neutral	We believe that there needs to be a clearer and less definition of which Modification Path a Modification Proposal should follow – and especially of the definition of 'material'. To date any DCC system affecting Modification Proposals have been progressed as Path 2 irrespective of the scale or impact of that change – for this Modification Proposal to be changed to Path 3 a clearer explanation of how the different paths are chosen needs to be provided. The Modification Path must not be changed purely as a way of achieving a June 2019 implementation date. Given the unclear definition of the benefits associated with this change it is not clear what additional benefit would be gained from making this change in June 2019 rather than November 2019.

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Question 7

Q7: Do you agree with the recommended implementation date?			
Party Name	Party Category	Yes/No	Comments
Western Power Distribution	Network Party	Yes	
SSEN	Network Party	Neutral	SSEN will need to make changes to its adapter and thus the required period of notice is necessary.
Electricity North West Limited	Network Party	Yes	
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date, but as previously noted the Modification Path must not be changed purely as a way of achieving a June 2019 implementation date. It is worth noting that even if the new version of SMETS and GBCS were to become effective in June 2019, it is unlikely that devices compliant with these new versions will start being installed until some months after this date.

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