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Stage 04: Modification Report Consultation Responses

SECMP0019 'ALCS/HCALCS Description Labels'

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 SECMP0019 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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Consultation
Response Form

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0019.

The Change Board will consider these responses at its meeting on 25th July 2018, where it will determine whether SECMP0019 should be approved.

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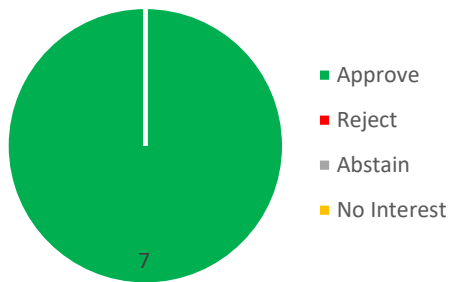
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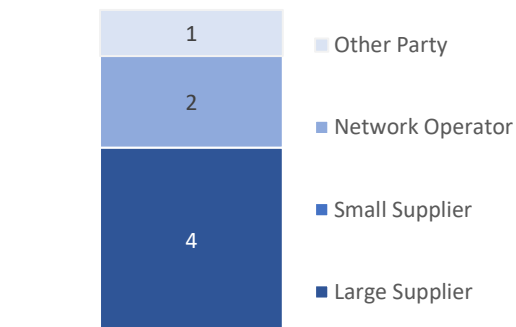
Summary of Responses

This section summarises the responses received to the SECMP0019 MRC.

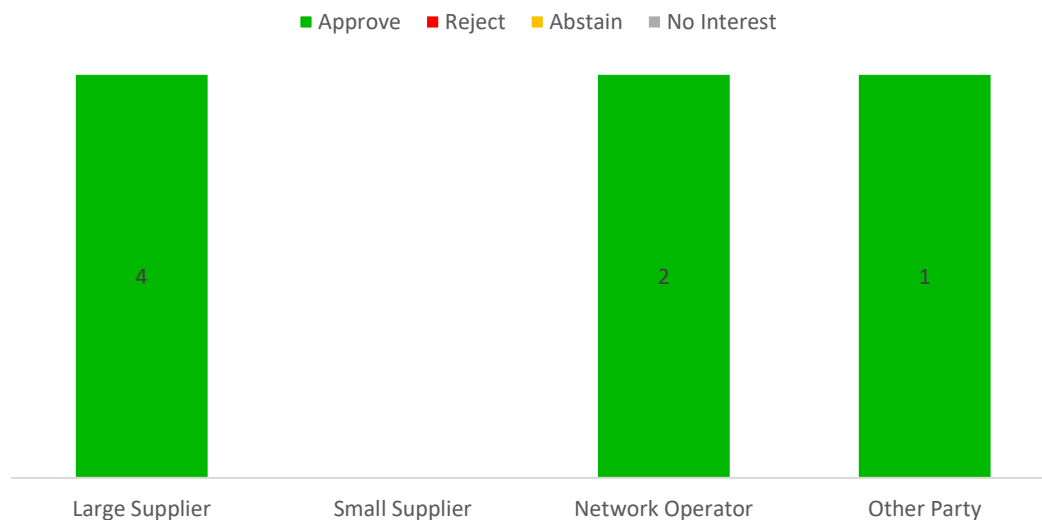
Respondents Views



Number of Respondents
(by Party Type)



Views by Party Type



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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
Utilita Energy	Large Supplier	Yes	We support the Working Group's view that this Modification better facilitates SEC Objectives a), c) and d) by ensuring the gaining Supplier understands the ALCS & HCALCS setup at an ESME following a Change of Supplier event.
Landis+Gyr	Other SEC Parties	Yes	It better facilitate SEC Objectives a, c and d, and improves efficiency and accuracy and better manage the COS process.
E.ON	Large Supplier	Yes	<p>If Suppliers engage with this list and it is subject to sufficient access controls, we agree that the solution would:</p> <ul style="list-style-type: none"> facilitate the operation of Smart Metering Systems and this objective a; facilitate a consumer's energy management through the provision of appropriate information (where this is visible to a consumer) via their Smart Metering System and thus objective c, and would facilitate effective competition by ensuring that Suppliers have access to information that permits them to refrain from providing poor customer service following a Change of Supply, therein facilitating objective d. <p>We note however, that the introduction of this list does not necessitate its use in the absence of any obligation, and there</p>

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			<p>is no requirement for any currently populated ALCS to be aligned to such a list, thus this change may introduce no benefit of any kind.</p> <p>In addition, we believe it would be worthwhile ensuring that there are no unintended consequences of having this list publicly available.</p>
Scottish Power	Large Supplier	Yes	SECMP0019 will, if implemented, better facilitate objectives A, C and D
Western Power Distribution	Network Operator	Yes	Western Power Distribution believe that the modification does better facilitate SEC Objectives (a), (c) and (d) for the reasons detailed in the FMR.
npower	Large Supplier	Yes	We are supportive of this modification. This will inevitably improve the customer experience and meet the SEC objectives outlined in the modification
SSEN	Network Operator	Yes	SSEN believe the proposed solutions better facilitates the SEC Objectives as set in this modification and should be approved.

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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 SECMP0019 should be approved?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	Yes	We believe this Modification will prevent avoidable disruption to customers and Suppliers in cases where confusion arises with having no common naming conventions of ALCS & HCALCS labels.
Landis+Gyr	Other SEC Parties	Yes	
E.ON	Large Supplier	Yes	We are supportive of the intent of this Modification but as given, the benefit is dependent upon voluntary uptake. Thus we would highlight that the benefits of this Modification are much the as those for the standardisation of reading registers for SMETS2+, and these have been accepted as codified requirements (under MRA).
Scottish Power	Large Supplier	Yes	
Western Power Distribution	Network Operator	Yes	Having considered the potential impacts and costs, Western Power Distribution believe that this modification should be approved.
npower	Large Supplier	Yes	

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SSEN	Network Operator	Yes	
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Question 3

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

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	Yes	We have no further comments on the proposed legal text.
Landis+Gyr	Other SEC Parties	Yes	
E.ON	Large Supplier	No	The Modification Report makes it clear that the utilisation of this list is optional, we therefore feel that F11.1 ("standardised naming convention for all possible") is very misleading because labels may exist that are not evident on the proposed list.
Scottish Power	Large Supplier	Neutral	Whereas the legal text will provide standardised naming for all possible ALCS and HCALCS, where an ALCS is not in use, we would prefer that it is not named.
Western Power Distribution	Network Operator	Yes	Western Power Distribution believe that the draft legal text changes deliver the intent of this modification.
npower	Large Supplier	Yes	
SSEN	Network Operator	Yes	SSEN response to this consultation appears not to have been included for the working group consideration.

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			<p>SSEN believes that a label to describe any type of Heat Pump (air to air, water to air) should be introduced as these types of load are significantly different by nature and DCC Users ability to identified them would also support the legal requirement to have them properly registered on a national level like EV or PV are now.</p>
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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	Yes	We believe this modification should be implemented as soon as reasonably practical and therefore we support the proposed implementation date.
Landis+Gyr	Other SEC Parties	Yes	
E.ON	Large Supplier	Neutral	It is not appropriate for Parties to be asked whether or not they agree with flouting the Release Management Policy; it is for the Panel to determine changes to a Release. To be clear, we would not object to the proposed implementation date if Panel were to approve it.
Scottish Power	Large Supplier	Yes	
Western Power Distribution	Network Operator	Yes	Western Power Distribution agree with the recommended implementation date.
npower	Large Supplier	Yes	
SSEN	Network Operator	Yes	

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Question 5

Q5: Do you have any other comments?

Party Name	Party Category	Yes/No	Comments
Utilita Energy	Large Supplier	No	N/A
Landis+Gyr	Other SEC Parties	No	No
E.ON	Large Supplier	Yes	<p>We would note that the Modification Report does not provide a sufficient governance process for making amendments to the proposed list (i.e. the process by which amendments can be requested of Panel, the process by which Panel will delegate this to TABASC and the associated timeline etcetera).</p> <p>We also note that the Modification Report proposes no 'next steps' for the alignment of this list with the ZigBee list. We would request some clarity as to who is responsible for overseeing this activity post implementation.</p>
Scottish Power	Large Supplier	No	
Western Power Distribution	Network Operator	Yes	<p>In the FMR under the Proposed Solution there is a list that was agreed by the Working Group derailing the labels to be included on the list. These include four labels, however the Working Group Discussions section shows the refined list as five labels. Please can SECAS confirm why 'Not In Use' has now been removed as we think that this is different to the 'Not Installed' label.</p>

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npower	Large Supplier	No	
SSEN	Network Operator	Yes	SSEN is disappointed that the response to the working group consultation was not presented to the working group. Email sent Wed 25/04/2018 10:58.

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