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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

SECMP0005 'Include Tariff and Register Labels in SMETS 2 Device'

About this document

This document contains the collated responses to the SECMP0005 Working Group Consultation (WGC). The Working Group 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 7081 3345 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 and should therefore be approved?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	Yes	Landis + GYR believes that the modification provides clear and useful information to the customer and as such it better facilitates SEC objective "c".
E.ON	Large Supplier	Yes	Where register labels are shared via the HAN to IHDs and PPMIDs consumers will have greater visibility of the active rate permitting them to manage their consumption accordingly, thus we believe that this solution better facilitates SEC objective c.

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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
Landis + GYR	Other	Yes	As it will trigger extra feature development and testing
E.ON	Large Supplier	Yes	Any change to DUIS results in significant, system-impacting, change for us internally.



Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	Yes	I have no figures to share
E.ON	Large Supplier	Yes	We will incur costs for the internal activities notes above as well as our portion of the implementation costs.

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 SECMP0005 should be approved?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	Yes	Not just for the reasons highlighted in question 1, we believe that SMETS2 is an enabler. So, if these labels are properly used, managed and maintained we believe there would be a larger role for them, as the current and future work covering EV, demand management and the future charging model develops.
E.ON	Large Supplier	No	<p>The current solution does not meet the intent of the Modification which was to have a standardised list of register labels that can be delivered to other Devices over the HAN.</p> <p>The current solution to this modification undoes the existing Industry standard for register labels in Electricity, as set out in Annex C of the DTC. As a result there will be no standardisation for register mapping across the Industry, thus this solution will introduce avoidable errors in settlement following a Change of Supply. There is also the potential to introduce further consumer confusion where different Suppliers are using similar but different register labels and they must re-learn the naming conventions each time they switch.</p> <p>Furthermore, the costs associated with this change seem beyond justification to us. We would have expected hundreds of thousands rather than millions for this change and we cannot rationalise these costs for the provision of 'consumer-friendly' register labels, particularly at the expense of Industry</p>

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			standardisation that is likely to result in additional costs to the Industry by way of erroneous settlement.
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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
Landis + GYR	Other	Yes	No comment
E.ON	Large Supplier	No	<p>It was never the intention of this Modification to create a dependency on firmware updates such that the Communication Hub Function (CHF) is updated prior to the meter. The current legal text removes the old GBCS Use Cases which means that there is no way that a Gas Smart Meter (GSME) with new firmware can synchronise with a CHF on old firmware.</p> <p>It is not clear to us within the current legal drafting whether the empty string sent by the Gas Proxy Function (GPF) will overwrite the labels that the GSME has sent to other Devices on the HAN (i.e. GSME had been updated by Supplier; GSME updated labels on other HAN Devices; GSME had to be replaced and was replaced with a GSME that does not support these labels, tariff change occurs on a Change of Supply but GSME cannot communicate these changes to Devices on the HAN and the GPF is sending empty strings). It is not the intent of the Modification to introduce errors or complexity into the Change of Supply process, or that the IHDs/PPMIDs should display erroneous data to a consumer.</p>

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Question 6

Q6: Do you agree with the recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	Yes	No comment
E.ON	Large Supplier	No	Where this is implemented in the November 19 Release, we are concerned about potential congestion in the testing environment given the likely SMETS1 testing at that point.



Question 7

Q7: Do you believe the Labels should be mandatory?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	Yes	Although there are pros and cons for them being mandatory, we believe that there is more to be gained by making them mandatory.
E.ON	Large Supplier	Yes	Mandatory, standardised register labels (and consequent mapping) already exist in Electricity; this is the only way in which erroneous settlement can be avoided following a Change of Supply.



Question 8

Q8: What do you plan to do with regards to handling register labelling prior to SECMP0005 being implemented, and how do you intend to liaise with your customers over this?

Party Name	Party Category	Comments
Landis + GYR	Other	N/A
E.ON	Large Supplier	N/A



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Question 9

Q9: What volume of queries have you received or anticipated receiving due to confusion over registers and their labelling?

Party Name	Party Category	Comments
Landis + GYR	Other	N/A
E.ON	Large Supplier	This is impossible to say; our data capture does not have register labelling as a standalone feature.



Question 10

Q10: What long term impacts (if any) would you incur if SECMP0005 is not implemented?

Party Name	Party Category	Comments
Landis + GYR	Other	N/A
E.ON	Large Supplier	This is hard to quantify today; we would likely incur the cost of an alternative solution and we believe currently that this would be less than the costs associated with this Modification.

Question 11

Q11: Do you have any further comments?

Party Name	Party Category	Yes/No	Comments
Landis + GYR	Other	No	No further comments
E.ON	Large Supplier	Yes	<p>We still contend that a new DUIS endpoint is not required for this solution. That aside however we would not endorse a new version of DUIS replacing an existing version; the end-date of a Technical Specification is governed by the TS Applicability Tables, not the introduction of new versions of Technical Specifications. Furthermore we would note that where the DCC intends to amend the end-date of a Technical Specification this requires a SEC Modification as has been confirmed as enduring design approach at the Design Release Forum (17/07/2018).</p> <p>The solution design specification also gives that a) if a replacement IHD or PPMID is installed, it cannot be assumed that the GPF or ESME will support the sharing of labels, and b) on initial installation, the CH must support the changes in this document if the GSME supports them. We are therefore concerned as to the viability of the current solution for shared-Supply situations (ESME-first install is the only one relevant to the latter of the statements).</p>

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