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## Stage 04: Modification Report Consultation Responses

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

# SECMP0025 'Electricity Network Party Access to Load Switching Information'

## About this document

This document contains the collated responses to the SECMP0025 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 Nikki Olomo on 020 7081 3095 or email [SEC.Change@gemserv.com](mailto:SEC.Change@gemserv.com).

SECMP0025

Working Group  
Consultation  
Response Form

6<sup>th</sup> August 2018

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## About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0025.

The Change Board will consider these responses at its meeting on 22<sup>nd</sup> August 2018, where it will determine whether SECMP0025 should be approved or rejected by the Authority.

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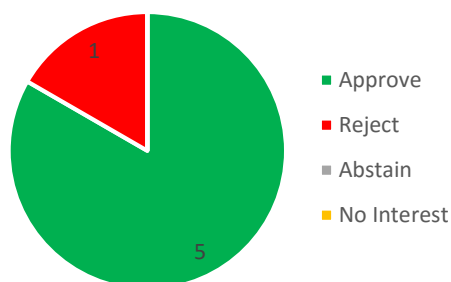
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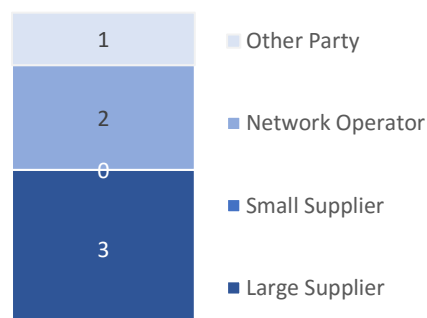
## Summary of Responses

This section summarises the responses received to the SECMP0025 MRC.

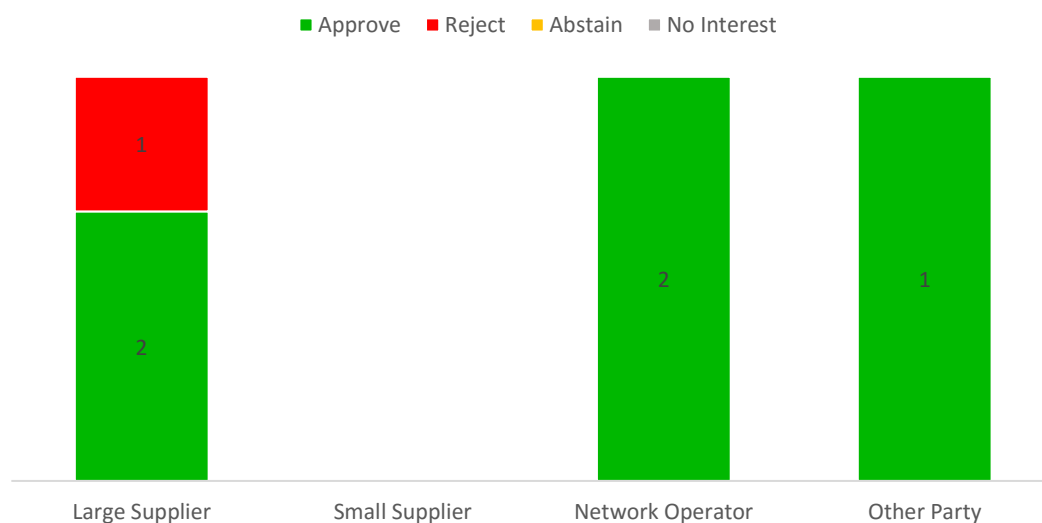
Respondents Views



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
E.ON	Large Supplier	Yes	Following the approval of SECMP0019 (subject to appeal) we agree that SECMP0025 can in conjunction with SECMP0019 better facilitate SEC objective (e). However, we note that the same outcomes may be achieved by less risky alternative solutions.
Landis+Gyr	Other	Yes	As it better facilitates SEC objective “e”
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
EDF Energy	Large Supplier	Yes	We agree that the proposed solution better facilitates SEC Objective (e) as it will enable Network Operators to be able to access information related to load switching times on their networks and therefore assist with the planning, operation and maintenance of their networks.
Utility Warehouse Ltd	Large Supplier	Yes	We believe this modification better facilitates general objective (e) as allowing ENP’s access to the ALCS / HCALCS schedules will assist with the operation and maintenance of their networks.
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN believes that SECMP0025 better facilitates SEC Objective (e), which is to facilitate such innovation in the design and operation of Energy

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			Networks, as this solution will better contribute to the delivery of a secure and sustainable Supply of Energy.
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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 SECMP0025 should be approved?**

Party Name	Party Category	Yes/No	Comments
E.ON	Large Supplier	No	<p>Demand Side Response is already well established and largely permits the intent of this Modification to be met. Despite requests from the Working Group (WG) there is still no reliable benefit-case for the proposed solution i.e. how will this data be used to create a dependable, sustainable Response Back Connectivity Model; how will such a Model demonstrably result in a reduction in network management/network reinforcement costs, and how will these savings be passed back to Suppliers and their relevant consumers?</p> <p>It has been made clear by at least one Network Operator that this is not necessary for local network management and this only increases the requirement to understand what the <i>actual</i> benefit of this change (should no appeal be received for SECMP0019) could be, before we can rationalise the costs for our consumers.</p> <p>Costs are already incurred for network innovation and provided to Network Operators under the 'Revenue = Incentives+Innovation+Outputs' (RIIO) arrangements, and any duplication must be justified.</p> <p>At present the testing arrangements for the current solution have not been determined and where this results in utilisation of the DCC the costs of this Modification will increase to an unknown level. We do not therefore feel comfortable considering the current costs as the full costs of this Modification, and would reiterate that a solid business case for the actual benefit of this change is required.</p> <p>We would further note that this must include consideration to the impact that this Modification will have on DCC's Traffic Management proposals:</p>

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			<p>not only in terms of threshold reductions for Suppliers where NOs now have two additional Service Requests and an additional Alert, but also in terms of the potential for the Alert to be treated as a duplicate despite it being required by two Parties.</p> <p>It would also be pertinent to note in the benefits-case, why some Network Operators are not able to manage their networks without this information where others are.</p> <p>We understand that it would be helpful for Network Operators to have visibility of certain information from Smart Meters and thus we believe that the WG ought to consider potential alternatives that would achieve the intent of this Modification without the risks and costs associated with the current solution.</p> <p>One such alternative could be a CAD solution, another could be the utilisation of Elective Services, etcetera.</p>
Landis+Gyr	Other	Yes	
Western Power Distribution	Network Party	Yes	<p>We are fully supportive of this modification as the benefits once implemented will be significant.</p> <p>We are unable to fully assess the costs to Western Power Distribution as the DCC implementation costs in the Modification Report do not include SIT, UIT and implementation costs.</p>
EDF Energy	Large Supplier	Yes	<p>While we agree that SECMP0025 should be approved we note that the total costs of implementing this Modification are yet to be determined as the costs provided only cover up to the end of PIT. While the benefits of this change have been clearly articulated and would seem to outweigh the costs of making this change, the costs remain uncertain.</p>

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Utility Warehouse Ltd	Large Supplier	Yes	Yes. ENP's will require access to the ALCS / HCALCS schedule to assist in the management of load switching in their network. This appears to be a cost-effective approach to enabling ENP's to manage this.
Scottish and Southern Electricity Networks	Network Party	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
E.ON	Large Supplier	Yes	<p>However, we note that we are not comfortable with changes being made to live Technical Specifications and would therefore ask that references to live Technical Specifications be removed.</p> <p>We also note the following observations:</p> <p>The current legal drafting contains "Error! Reference source not found" in many places, although this is not a direct result of the changes being made we were under the impression that such housekeeping changes would be corrected coincidentally.</p> <p>We believe that [Optional] is missing in Table 35, where 'ye' now precedes "Upon Successful Completion" in the second paragraph.</p> <p>Table 256 was given as Table 249 in the previous legal text, we would just like to check which of these references is correct please?</p>
Landis+Gyr	Other	Yes	
Western Power Distribution	Network Party	Neutral	With regards to the draft legal text, we have reviewed and agree with the data items and values, however, as we do not use the GBCS in detail we feel that others will be better positioned to comment.
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text changes.

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Utility Warehouse Ltd	Large Supplier	Yes	We have no concerns with the draft legal text.
Scottish and Southern Electricity Networks	Network Party	Yes	Just querying entry page 3 and 4 that seems to read GBCS v1.0 Use case (GBCS v12.0 MessageCode) while we start with GBCS v2.0, 2,1 and 3..

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## Question 4

### Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
E.ON	Large Supplier	Neutral	Whilst we note that the proposed implementation date accords with the Release Management Policy, we would be concerned about any implementation of this Modification without the required benefits-case. We would also highlight that the longer this takes to establish, the more compressed our timeline for procuring assets that accord with the amended Technical Specifications becomes.
Landis+Gyr	Other	Yes	-
Western Power Distribution	Network Party	Yes	The benefits of this modification will enable DNOs to be better informed when making decisions with regards to network management and reinforcement ensuring that works to the network are only completed when absolutely necessary. The earlier this modification, if approved, is implemented, the quicker these benefits will be realised especially considering the new challenges networks will be faced with demand control and generation.
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date – we assume that the benefits to be gained from this Modification would be diminished as a result of the later implementation date which may need to be considered.
Utility Warehouse Ltd	Large Supplier	Yes	-

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Scottish and Southern Electricity Networks	Network Party	Yes	This will be challenging considering the numerous work load DCC is responding to.
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## Question 5

### Q5: Do you have any further comments?

Party Name	Party Category	Yes/No	Comments
E.ON	Large Supplier	Yes	We would just like to clarify that costs and traffic management aside, we have no objection to Network Operators accessing the data permitted by SRs 6.13 and 7.7.
Landis+Gyr	Other	No	-
Western Power Distribution	Network Party	No	-
EDF Energy	Large Supplier	Yes	As noted above, while we support the implementation of this change in principle, the outstanding question of the total costs of making any changes to the DCC systems to support this and other similar changes remains a concern. It is hard to decide whether there is a business case for making any change and whether customers will benefit from any investment when the costs continue to be so uncertain.
Utility Warehouse Ltd	Large Supplier	No	-
Scottish and Southern Electricity Networks	Network Party	No	-

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