



Smart Energy Code

Working Group Detailed Considerations: SECMP0004 - Inclusion of industry Device Serial Number within the DCC Smart Metering Inventory

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

This document contains the detailed discussions of the SECMP0004 Working Group. It highlights the groups consideration, and development, of the proposed solution.

This document also contains the responses to the Working Groups Consultation (including any confidential comments. It also includes the Working Groups responses to those Working Group Consultation responses.

If you would like any further information, or if you have any questions, please contact **Samuel Browne** on 020 7090 7755.

Contents

1.	Solution Development	2
2.	Working Group Consultation Reponses	4
3.	Working Group Membership	22
4.	Terms of Reference	23

1. Solution Development

This section contains a summary of the Working Group’s discussions regarding the development of the SECMP0004 solution and any potential alternative solutions that were considered.

Potential alternative

As part of developing the modification solution, original consideration was given to an alternative solution of making the Device Serial Number (DSN) field available for all SMETS2 devices and not just the proposed Electrical Smart Metering Equipment (ESME) and Gas Smart Metering Equipment (GSME). The Data Communication Company (DCC) provided costs for alternative requirements to capture the serial numbers of other smart devices in the Smart Metering Inventory (SMI). DCC split the cost of these developments into two options:

- Option A: Support for Pre-Payment Meter Interface Devices (PPMIDs) and In-Home Displays (IHDs) (£30,000)
- Option B: Support for all Devices in the SMI (£30,000 additional to option A)

The Working Group considered whether to future-proof the SMI by capturing DSNs for all Smart Metering Equipment Technical Specification 2 (SMETS2) Devices through this Modification Proposal, or alternatively by raising a new Modification Proposal when the need arises. The DCC noted that although it is unlikely that a new Modification Proposal would have as high a cost as SECMP0004, adding DSNs for all SMETS2 devices to the SMI would cost more if implemented alone than if implemented as part of the current modification.

The Working Group Members noted that Globally Unique Identifiers (GUIDs) should be the main identifier for SMETS2 devices. Therefore, this modification should focus solely on ESME/GSME.

Terminology - Device Serial Number

While the alternative to capture all SMETS2 device serial numbers in the SMI was not taken forward, the Working Group proposed a naming change of the new SMI field from Meter Serial Number (MSN) to Device Serial Number (DSN). The intent of this terminology change was to future proof this modification, as the field, may be required to support device types other than ESME and GSME, at a future point if an associated modification was raised to add the serial number of device types other than ESME and GSME to the SMI.

Backfilling mechanism

Considering the timeline for the implementation for this modification, suppliers expect to have a significant number of meters installed by the time SECMP0004 is implemented, if approved. Therefore, a method of backfilling the SMI needed to be developed and established as part of the modification to help DCC with smoothing peak demand. Given the volume of forecasted installations, the governance mechanism was developed to avoid a situation (albeit unlikely) where all suppliers send their backfilling SRs over a short period, resulting in a DCC System overload.

SECAS presented options for a backfilling governance method in three parts:

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 2 of 23

This document is
classified as **White**

© SECCo 2017

Process

Firstly, SECAS proposed three options for the mechanism that would drive backfilling.

1. User driven process.
2. DCC driven process.
3. SECAS driven process.

The Working Group decided upon the first option. The Working Group noted they sought central control to help them discharge their obligation to maintain the SMI. To support the option chosen by the Working Group, DCC will create a Self-Service Interface (SSI) report allowing suppliers an overview of assets that need to be backfilled.

Setting a daily limit

Secondly, SECAS presented two mechanisms for the DCC to calculate the Supplier Daily Limit:

1. Market Share =
2. Equal Supplier Share =

The Working Group decided upon the first option as it was deemed more fair. This option requires that the Supplier Daily Limit depends upon the number of supplier devices that need backfilling. The Working Group noted that DCC would need to provide some leeway to account for any churn that may arise from any change of suppliers.

Governance

The Working Group discussed a mechanism for monitoring suppliers' compliance with this process. The Working Group decided that, if required by the Panel, DCC should update the Panel on backfilling progress and highlight any cases of material non-compliance.

2. Working Group Consultation Reponses

The SECMP0004 Working Group consultation was issued on 7th November 2016 with responses returned by 28th November 2016.

A total of nine responses (five from Large Suppliers, three from Networks and one from an Other SEC Party) who, by majority, supported the implementation of this modification. The full responses are provided below:

Q1. Is your organisation impacted by SECMP0004? If so, please indicate how much lead time your organisation requires to implement it from approval of the change?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
Northern Powergrid Metering Limited	Other SEC Party	Yes	As a Metering Asset Provider (MAP) we are keen for the DSN information to be stored within the SMI as it will improve the traceability of the assets we own, particularly through the installation, change of supplier and removal processes. There is no lead time to implement as we will not be responsible for the provision or maintenance of this data.	Noted
Scottish and Southern Electricity Networks	Electricity Network	No	From a technical perspective we assume that we are not impacted by this change proposal. This holds true as long as we are not mandated to change our interface with the DCC to manage any issues associated with changes to Service Request Variant (SRV) 8.2 - Read Inventory.	Noted
Electricity North West	Electricity Network	No	N/A	Noted
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	Implementing SECMP0004 would require changes to a number of our systems and processes, making it difficult to introduce into our schedule before February 2018.	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 4 of 23

This document is
classified as **White**

© SECCo 2017

Q1. Is your organisation impacted by SECMP0004? If so, please indicate how much lead time your organisation requires to implement it from approval of the change?

Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
Western Power Distribution	Electricity Network	Yes	Minor impact as the modification means we will have the benefit of being able to read the DSN. This will require minor changes to our processes and LWI's for managing service requests and interaction with the SSI. Due to the limited impact the required lead time will be three months.	Noted
E.ON Energy Solutions	Large Supplier	Yes	Requirements to pre-notify DSN and back-filling of DSN for assets already installed will require changes to internal systems and processes. We would anticipate a minimum 12 months to implement.	Noted
EDF Energy	Large Supplier	Yes	We would be impacted by SECMP0004 – as a supplier we would be obliged to upgrade to the new version of the DCC User Interface Specification (DUIS) and to back-populate the missing values when this new data item is introduced. We would usually require 12 months from the point of approval to be able to implement this sort of change, however given the importance that we attribute to making this change we believe that we could implement this change with nine months' notice if required to make an earlier release date.	Noted
npower	Large Supplier	Yes	We are impacted more by the fact that this hasn't been implemented yet. We would require 12 months' implementation lead time.	Noted
SSE	Large Supplier	Yes	We require 12 months' lead time from the approval of the change to implement. This is due to overall levels of industry change, and to ensure we have sufficient time from the availability of the XML Schema to design, build and test our systems.	Noted
ScottishPower Energy Retail Ltd	Large Supplier	Yes	Implementing SECMP0004 would require changes to a number of our systems and processes, making it difficult to introduce into our schedule before February 2018.	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 5 of 23

This document is
classified as **White**

© SECCo 2017

Q2. What is the development, capital and operating cost to your organisation, associated with the implementation of SECMP0004?

Party Name	Party Category	Response		
		Amount	Comments	WG consideration
Northern Powergrid Metering Limited	Other SEC Party			
Scottish and Southern Electricity Networks	Electricity Network	£0 – £50,000		Noted
Electricity North West	Electricity Network			
Western Power Distribution	Electricity Network	£0 – £50,000		Noted
E.ON Energy Solutions	Large Supplier			Noted
EDF Energy	Large Supplier			Noted
npower	Large Supplier	£500,000 - £1,000,000	Unpicking workarounds and designing enduring process	Noted
SSE	Large Supplier	£50,000 - £250,000	This was difficult to assess as we thought there were elements missing to the proposed solution regarding the “backfilling” process. We believe this process would require at least one wash up activity to handle churn during the backfill period, if not more. This has an impact on the overall costs. In addition, volumes and potential	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 6 of 23

This document is
classified as **White**

© SECCo 2017

Q2. What is the development, capital and operating cost to your organisation, associated with the implementation of SECMP0004?

Party Name	Party Category	Response		
		Amount	Comments	WG consideration
			exceptions will have implications for the duration of the backfill period, along with the necessary demand management and anomaly detection.	
ScottishPower Energy Retail Ltd	Large Supplier	£250,000 - £500,000	At the lower end of this cost band.	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 7 of 23

This document is
classified as **White**

© SECCo 2017

Q3. What is the benefit of SECMP0004 to your organisation?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
Northern Powergrid Metering Limited	Other SEC Party		There is a benefit to all MAPs in being able to track assets. This benefit will be delivered to other market participants via lower device rental charges if the risk premium associated with asset loss can be reduced through better asset tracking.	Noted
Scottish and Southern Electricity Networks	Electricity Network	£0 – £50,000	<p>There is no benefit to Electricity Distributors role from this proposed change.</p> <p>Whilst the annual on-going operating costs are deemed to be nil. There will be additional DCC charges levied as part of the ongoing charging regime.</p> <p>We are concerned that the DCC's costs associated with the development of this Modification Proposal are very high for what appears to be a relatively minor change. We seek assurance that the DCC has provided sufficient detail in their quotation to the Working Group which ensures that their costs are subject to an appropriate level of scrutiny. If the cost breakdown to the Working Group is not sufficiently detailed, then the Working Group must seek further granular information from the DCC.</p>	Noted
Electricity North West	Electricity Network			
Western Power Distribution	Electricity Network	£0 – £50,000		Noted
E.ON Energy Solutions	Large Supplier			Noted
EDF Energy	Large Supplier			Noted
npower	Large Supplier		Data quality.	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 8 of 23

This document is
classified as **White**

© SECCo 2017

Q3. What is the benefit of SECMP0004 to your organisation?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
SSE	Large Supplier	£0 – £50,000	<p>We have assessed this proposal and whilst we recognise that there could have been benefits if this was part of the solution from day one, we believe that there are limited benefits to include the DSN in the SMI.</p> <p>This is on the basis of:</p> <ul style="list-style-type: none"> • Our processes for Smart are being developed to be suitable for ongoing management without this information being available in the SMI; • Use of the existing SMI data item “MPxN” can provide a suitable mapping between data in the SMI and legacy systems. 	Noted
ScottishPower Energy Retail Ltd	Large Supplier	£50,000 - £250,000	This is considerably more difficult to quantify. Although an early supporter of this change, we have since designed our systems in the absence of the DSN, and the benefits are no longer so clear cut.	Noted

Q4. Do you agree with the Working Group's views against the SEC Objectives?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
Northern Powergrid Metering Limited	Other SEC Party	Yes		Noted
Scottish and Southern Electricity Networks	Electricity Network	Yes		Noted
Electricity North West	Electricity Network	Yes	<p>This sounds like a sensible request which we support and comfortable that this was previously discussed at DCC design forums.</p> <p>We agree with the Working Group's views against the SEC Objectives outlined in section 6.1 of the Consultation document. Having a link between the DCC Device ID and the Meter Serial Number will help ensure consistency and data quality with existing industry (DTN) processes. Having the Meter Serial Number in the DCC inventory will aid identification of the correct device and premise when dealing with any supplier/DCC queries.</p>	Noted
Western Power Distribution	Electricity Network	Yes	Agree with the Working Group's views that General SEC Objective (a) is better facilitated by this proposed modification because the inclusion of the DSN in the SMI would provide additional confirmation when mapping MPAN information held in other industry systems used by suppliers and other industry parties which will therefore be more efficient.	Noted
E.ON Energy Solutions	Large Supplier	Yes	We agree with the Working Group's conclusions that inclusion of the DSN will better facilitate the baseline SEC Objective a).	Noted
EDF Energy	Large Supplier	Yes	We agree that this change will better facilitate SEC Objective (a) – as noted including the DSN in the SMI will enable accurate mapping between smart metering communication flows and legacy industry dataflows, improve the timeliness and accuracy of the CoS process for smart meters (specifically the process changes	Noted

Q4. Do you agree with the Working Group's views against the SEC Objectives?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
			made under BSC Modification P302) and improve over metering data quality for smart meters.	
npower	Large Supplier	Yes		Noted
SSE	Large Supplier	No	Whilst we acknowledge that there are synergies for providing a centralised view of DSN mapped to GUID versus multiple views, we do not see the specific benefits for industry or suppliers, that are above and beyond the existing ability to utilise ECOES and DES data. The benefits for what this extra mapping would bring, in addition to the current triangulation, does not seem to have been clearly articulated in the Working Group consultation document.	Noted
ScottishPower Energy Retail Ltd	Large Supplier		<p>We find it difficult to understand how the central costs can be as high as the consultation suggests. While we mostly agree with the Working Group's rationale, our systems are already designed to utilise the GUID for similar purposes and these central costs might outweigh the benefits.</p> <p>Whether the proposed solution satisfies the efficiency test, implicit in the first General SEC Objective, is therefore moot.</p>	Noted

Q5. Do you agree that the proposed legal text delivers the intent of SECMP0004?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
Northern Powergrid Metering Limited	Other SEC Party			
Scottish and Southern Electricity Networks	Electricity Network		Not reviewed.	Noted
Electricity North West	Electricity Network			
Western Power Distribution	Electricity Network	Yes		Noted
E.ON Energy Solutions	Large Supplier	Yes	We believe on balance this is probably the right decision. The modification, if approved, will impact all suppliers. It therefore seems right that any wider issues of competition are fully considered.	Noted
EDF Energy	Large Supplier		<p>In the main the proposed legal text delivers the intent of SECMP0004, however we do have the following comments on the proposed legal text:</p> <ul style="list-style-type: none"> • Definition of Device Serial Number – it might be useful to refer to the existing meter serial number data items in the MRA/SPAA (which are already referenced in the SEC) to make it clearer that the same values should be used here. • In regards to the section on ‘Managing Demand following Modification Proposal Implementation’ it needs to be made clear whether the Service Requests that are sent in order to comply with the SMI Backfilling Requirement need to be included in the SR forecasts that used are obliged to provide by H3.22. If they are not 	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 12 of 23

This document is
classified as **White**

© SECCo 2017

Q5. Do you agree that the proposed legal text delivers the intent of SECMP0004?

Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
			<p>included in the SR forecasts then the impact on reporting (H3.24) and the achievement of DCC SLAs (H3.28) will need to be considered.</p> <ul style="list-style-type: none"> H3.33 - the User's SMI Backfilling Requirement will be sent using the same SRs as are used for BAU transactions – it is not clear how the DCC will be able to relate SRs sent to the Backfilling Requirement. Maybe the legal text should refer to report setting out the outstanding percentage of the User's original backfilling requirements instead? H3.34 – Does this information need to be on the web-site where is visible to all parties? Clause 2.6A for Appendix AC – this obligation does not seem to be sufficient as it only requires the DSN to be populated when a device is added – it doesn't require it to be backfilled and this is not mandate elsewhere in the draft legal text. We would suggest that this needs to be amended to show that the DSN must be populated for all devices held on the SMI. Definition of DeviceSerialNumber – not sure 'used by the manufacturer' is the right phrase – maybe created or allocated would be more appropriate instead? DUIS clause 3.8.93.4 – the proposed legal text does not appear to be consistent with the existing legal text in this clause, for example the proposed text refers to EIS but the existing text refers to Import Supplier and Gas Supplier. We would propose the following as an alternative: <p>5) Update Device Serial Number associated with the Device within the Smart Metering Inventory</p> <p>a. The functionality of the Service Request allows an Eligible User to update the Device's Device Serial Number.</p>	

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 13 of 23

This document is
classified as **White**

© SECCo 2017

Q5. Do you agree that the proposed legal text delivers the intent of SECMP0004?

Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
			<p>b. This functionality of the Service Request is available to all the Eligible User Roles associated with this Service Request.</p> <p>c. Only the User who originally added the Device to the Smart Metering Inventory may update these device details whilst the Device has a status of 'Pending'.</p> <p>d. This functionality of the Service Request is ONLY available to the Eligible User Roles of Import Supplier and Gas Supplier who are the Responsible Supplier where the device has a status that is not 'Pending'</p> <p>e. This functionality is only applicable to ESME and GSME Devices.</p> <p>DUIS clause 3.8.93.4 will also need to be updated to show that 'This Service Request can be used by Users to perform the following five functions' – it currently refers to four functions.</p>	
npower	Large Supplier	Yes		Noted
SSE	Large Supplier	No	<p>We have reviewed the proposed legal text and have the following comments for review or clarification by the Working Group.</p> <p>As a general comment, the proposed legal text and “backfilling process” does not seem to adequately address consumer churn and is therefore a gap. Based on previous industry retrospective populations in Gas and Electricity for Smart data items, this scenario needs to be accounted for in the proposed approach. We look forward to further information on how churn, with the resultant risk to the population of data, will be addressed.</p> <ul style="list-style-type: none"> Section A1.1 Definitions – Device Serial Number: We are not confident that this is an accurate definition for DSN based on the reference to an identification number. In addition, we note the proposed legal text for Table 214 in clause 	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 14 of 23

This document is
classified as **White**

© SECCo 2017

Q5. Do you agree that the proposed legal text delivers the intent of SECMP0004?

Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
			<p>3.8.91.4 of Appendix AD suggests that meters added prior to implementation of the new schema, will be set as 'Unknown' and this does not seem to align with the proposed definition.</p> <ul style="list-style-type: none"> • Section H3.29(a): Given customer churn, would Users be able to submit an accurate forecast of volumes? At this point the duration of the “backfilling process” would be unknown, and therefore any such forecast would be subject to variation over time across all suppliers. • Section H3.30: Based on the proposed legal drafting, with these unknowns we are unable to advise if we could realistically commit to the plan. There is no verification with Users to confirm that the SMI Backfilling Target Completion Date is achievable – the proposed legal text is asking Users to commit to obligations without clear expectations on volumes and anticipated duration, or the means to negotiate based on resource and capacity across industry. We seek clarification on what would happen if a User was unable to backfill the requisite amount each day. For example, would there be an allocation for a further allowance of days or any scope for the plan to become more flexible? • Section H3.31: With the proposed legal text, it is difficult to assess the resourcing requirements for meeting the SMI Backfilling Daily Limit that DCC would calculate. There is no proposed approach to re-calculate where a User may request it to meet the requirement. This is linked to our comments provided for Section H3.30. • Section H3.32: We seek clarification about the SRV(s) that this legal text specifically refers to, as it suggests that Users could need to accumulate other updates during the backfilling period. This is on the basis that we wouldn't be able to go above the SMI Backfilling Limits, or other valid requests for that relevant SR could be unprocessed by the DCC. We expect there to be further explanation in the legal text on what would happen next in the event that DCC determines the limit has been exceeded and therefore they are not obliged to process the request. 	

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 15 of 23

This document is
classified as **White**

© SECCo 2017

Q5. Do you agree that the proposed legal text delivers the intent of SECMP0004?				
Party Name	Party Category	Response		
		Yes/No	Comments	WG consideration
			<ul style="list-style-type: none"> Clause 3.8.93.3 (Specific Validation for this Request) in Appendix AD: Is this the only validation element that DCC will apply? Clause 3.8.93.4 (Additional DCC System Processing) in Appendix AD: This seems unclear for how sub-clause 5(b)i would work, as the two provisions seem to contradict. Would 5(b)i1 be just visible to these Users but locked for editing so that only 5(b)i2 could edit? What would take precedence if more than one updated within the same period of time? We would seek further clarification to the proposed legal text for 5(b)i. We also note that further clarity would benefit the proposed legal text for 5(b)ii. 	
ScottishPower Energy Retail Ltd	Large Supplier	Yes		Noted

Working Group response to Q5 comments: the Working Group noted the observation on the proposed legal text and has updated the legal text provided in Attachment A accordingly.

Q6. SECMP0004 was initially considered by the Panel to have a material impact on competition and therefore be a Path 2 (Authority-Determined) modification. Do you agree that it should continue to be treated as such?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Consideration
Northern Powergrid Metering Limited	Other SEC Party			
Scottish and Southern Electricity Networks	Electricity Network	Yes		Noted
Electricity North West	Electricity Network			
Western Power Distribution	Electricity Network	Yes		Noted
E.ON Energy Solutions	Large Supplier	Yes	We believe on balance this is probably the right decision. The modification if approved will impact all suppliers. It therefore seems right that any wider issues of competition are fully considered.	Noted
EDF Energy	Large Supplier	Yes	We agree that this change has a material impact on competition as a consequence of the impacts that would result from this change being made, and should therefore be a Path 2 (Authority-Determined) modification.	Noted
npower	Large Supplier	Yes		Noted
SSE	Large Supplier	Yes		Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 17 of 23

This document is
classified as **White**

© SECCo 2017

Q6. SECMP0004 was initially considered by the Panel to have a material impact on competition and therefore be a Path 2 (Authority-Determined) modification. Do you agree that it should continue to be treated as such?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Consideration
ScottishPower Energy Retail Ltd	Large Supplier	Yes	We believe the costs of the change to be sufficiently material to parties to warrant Path 2 treatment.	Noted



Q7. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Consideration
Northern Powergrid Metering Limited	Other SEC Party	Yes	<p>MAPs are providing the funding for the roll-out of smart meters. In order to keep the costs to a minimum the risk premium associated with assets lost during installation, CoS or removal must be kept to a minimum. This can be achieved via improved data provision allowing better tracking of smart meters.</p> <p>As a MAP we are fully supportive of this change proposal.</p>	Noted
Scottish and Southern Electricity Networks	Electricity Network	Yes	<p>There appear to be significant synergies between this modification proposal and SECMP0011. If both are approved, we would expect them to be managed and delivered in the same future DCC release so that maximum cost saving synergies can be applied. This is particularly relevant to these two Modification Proposals since both relate to changes in the SMI and changes to the same SRs.</p> <p>We are keen to understand why the DCC's development and capital costs are significantly different for this modification proposal (£1,300k) and SECMP0011 (£530k to £730k) when both appear very similar in nature.</p>	Noted
Electricity North West	Electricity Network		<p>It is of our view, that given both this modification proposal and SECMP0011 'Including the MAP ID in the Smart Metering Inventory' affect the DCC inventory and the same DCC service requests/SSI functions then if both are approved they should be combined as a single delivery in order to realise synergy savings in design, development, test and implementation by the DCC and Users.</p> <p>Also, we believe that any changes to the DCC 'Read Inventory' SR should be implemented as 'optional' XML attributes so as to allow DCC Users to decide whether to implement changes to their systems or not.</p>	Noted
Western Power Distribution	Electricity Network	Yes	<p>The Working Group Consultation document refers to the SMI uniquely recognising each Gas and Electricity Smart Meter by its GUID, however, the legal text Section A1.1 Definition of Smart Metering Inventory has the information held as</p> <p>“(a) its Device Type</p>	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 19 of 23

This document is
classified as **White**

© SECCo 2017

Q7. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Consideration
			<p>(b) its Device ID</p> <p>(bi) where it is a Smart Meter, its Device Serial Number</p> <p>Etc.”</p> <p>To avoid confusion, as there are now two identifiers for a device in the inventory, it would be beneficial to expand the description of item (b) to state “its Device ID (GUID)”.</p>	
E.ON Energy Solutions	Large Supplier	No		Noted
EDF Energy	Large Supplier	No	<p>Having proposed this change we are strongly supportive of making the change given the benefits that we believe that this change will bring in terms of data quality and process efficiency. We are concerned at the indicative cost information that have been provided by the DCC in regards to the changes to their systems – this cost does seem to be disproportionately high for what we would regard as being a low complexity change to the DCC systems – in fact we have tried to make the change as simple as possible in order to minimise the costs of this change. It needs to be ensured that the DCC are challenging their Service Providers to minimise costs wherever possible – we are concerned that the high costs of making simple changes to the DCC could become a barrier to change, requiring Parties to develop sub-optimal process or workarounds as a result.</p>	Noted
npower	Large Supplier	No	We have been present at the Working Group.	Noted

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 20 of 23

This document is
classified as **White**

© SECCo 2017

Q7. Do you have any other comments on the solution? Including any impacts not identified by the Working Group as set out in the consultation document, or any other comments/questions that you would like the Working Group to consider?

Party Name	Party Category	Response		
		Yes/No	Comments	WG Consideration
SSE	Large Supplier	Yes	<p>We have set out the points below for further consideration:</p> <ul style="list-style-type: none"> • Consideration of populating the data when there is a CoS Loss rather than attempting a backfilling process – this could be an alternative that proves more efficient and cost-effective across industry. • Backfilling process would need to have a wash up - with the approach proposed there will be churn within the period of updates and these will need to be covered off by the responsible supplier. • Further analysis should be undertaken to identify the projected volumes by the time this modification could be implemented, to understand potential duration of the ‘backfill’ process and provide Users with meaningful information to be able to fully assess the risks and provide a more accurate response in terms of impacts. 	Noted
ScottishPower Energy Retail Ltd	Large Supplier	Yes	<p>We were surprised by the scale of the central costs, which are much higher than we anticipated. Noting the similarities between the solutions for SECMP0004 and SECMP0011, it would be useful to understand whether implementing this proposal in conjunction with SECMP0011 would see a reduction in the costs for both.</p>	Noted

3. Working Group Membership

During the initial consideration of SECMP0004, the Panel agreed for the modification to be allocated to Working Group 2 during the Refinement Process.

The following table contains a list of the Voting Working Group 2 Members and the Working Group meetings they each attended to discuss SECMP0004.

Working Group 2 Membership and Attendance							
Working Group Member	Organisation	Meeting 1	Meeting 2	Meeting 3	Meeting 4	Meeting 5	Meeting 6
		1 st April 2016	9 th May 2016	20 th June 2016	20 th August 2016	18 th October 2016	29 th November 2016
Andy Knowles	Utilita Energy	X	X		X	X	
Emslie Law	SSE	X	X	X	X	X	X
Graham J Smith	Scottish Power	X	X				
Graham Wood	British Gas	X					
Jane Franklin	Lowribeck	X	X	X	X	X	X
Paul Saker	EDF	X	X	X	X	X	X
Sam Charlton	E.ON	X	X	X			
Hugh Mullens	Utility Funding		X	X	X	X	X
Richard Pomroy	WW Utilities		X				
Mark Pitchford	nPower		X	X		X	X
Stuart Haughton	Calvin Capital		X				
Elias Hanna	Landis & Gyr				X		X
Tim Newton	E.ON				X	X	X
Attendee Count		7	10	6	7	7	7

4. Terms of Reference

To meet the requirements of the Refinement Process set out in SEC Sections D6.8 - D6.14, the Panel agreed standard Terms of Reference (ToR) and identified supplementary matters for the Working Group to consider in order to fully assess the Modification Proposal.

The below table contains these questions and highlights the sections in this document where they have been addressed.

Working Group ToR – supplementary matters to consider	
Question	Section(s) of this document
What is the materiality of the issue?	Section 2 (Why Change?)
What are the detailed changes to the DUIS to support this SECMP0004 (and it's Alternative(s))?	Section 3 (Solution)
What are the systems impacts for DCC/User/Smart Meters?	Section 3 (Solution)
What are the costs and lead times to introduce the solution in this SECMP0004 or its Alternative(s)?	Section 4 (Costs and Impacts)
Is the implementation timetable appropriate?	Section 4 (Costs and Impacts)
Are Consumers positively or negatively impacted by the Proposed (or any Alternative) solutions and to what extent?	Section 4 (Costs and Impacts)
What Modification Implementation Testing is required to implement the Proposed Modification, or any Alternative(s)?	Section 3 (Solution)
What are the implementation steps and activities required to implement the Proposed (or an Alternative) Solution(s)?	Section 3 (Solution)
Have the views of the relevant Panel Sub-Committee been taken into account?	Section 6 (Views)
Has the Refinement Process identified any potential reason that this modification (or its Alternatives) may require EC Notification (noting that the Authority will determine if any such Notification is pursued)?	Section 3 (Solution)

SECCB_11_1904_01

SECMP0004 – FMR
Attachment B

10th March 2017

Version 1.0

Page 23 of 23

This document is
classified as **White**

© SECCo 2017