

MHHS Design Advisory Group Headline Report

Issue date: 18/03/22

Meeting Number **DAG006.1 (Extraordinary)**

Venue **Virtual – MS Teams**

Meeting Date and Time **17 March 2022 10:00-11:30**

Classification **Public**

Actions

Area	Action Ref	Action	Owner	Due Date	Update
Level Playing Field Principle	DAG06.1-01	Consult the Smart Market Segment Sub-Group (SDS) user group on whether there is a requirement for Target Response Times (TRTs) of less than 24 hours for meter data retrieval related to MHHS, and associated scenarios, frequency of retrieval, and cost implications for suppliers	Programme (Design Team)	13/04/2022	
	DAG06.1-02	Consider whether closer working with SEC working groups is required and consider joint working group with SEC and MHHS parties regarding SEC MP162 and data retrieval from DCC systems	Programme (Design Team)	13/04/2022	

Decisions

Area	Dec Ref	Decision
None		

RAID Items Discussed

RAID area	Description
None	

Key Discussion items

Area	Discussion
Meeting Objectives	The Chair explained the purpose of the meeting was to consider how the MHHS Programme design principle relating to a level playing field for parties could be applied to those requiring access to Data Communications Company (DCC) systems. Specifically, whether the latest drafting of Smart Energy Code (SEC) Modification Proposal (MP) 162 discharges the level playing field principle in SEC and DCC systems, or whether there is further action required by DAG or other MHHS governance groups.
Level Playing Field Principle	<p>The primary matter for discussion related to how a level playing field can be enabled when the Target Response Times (TRTs) for service requests made to the DCC are different for parties undertaking a Meter Data Retrieval (MDR) role who are not suppliers. It was considered reasonable that suppliers could obtain faster response times for certain non-MHHS service requests but unclear how, when a supplier makes service requests for MHHS-related data, it can be assured the TRTs are the same as for those who are not suppliers. There is no obvious route to monitoring and enforcing the level playing principle from this perspective, and there was uncertainty on whether supplier service requests can be differentiated in terms of whether the request relates to data for MHHS purposes, and therefore what TRT should apply. The risk is that suppliers could obtain quicker response times than non-supplier parties and circumvent the level playing field principle.</p> <p>The group noted it was a current assumption of both the DAG and the SEC MP162 working group that there is no requirement for a TRT of less than 24-hours for any MHHS-related service request to DCC systems. One member of the group highlighted that recent documentation issued by the MHHS Programme Design Team indicated there may be a requirement for a TRT of less than 24 hours in relation to meter de-energisation and questioned whether the assumption was correct.</p> <p>It was highlighted there would likely be a significant cost associated with allowing TRTs of less than 24 hours for all parties and that considerable uncertainty exists around whether this is necessary and what the likely volume and frequency of requests would be. This presents challenges in assessing the optimum solution. Other solutions may involve seeking to differentiate between service requests from suppliers that relate to MHHS data and those that do not and applying the appropriate TRT or implementing monitoring and assurance measures on the use of service requests by suppliers and reporting on whether the correct TRTs are applied. The group did not identify a clear solution to ensure the level playing field principle is adhered to. The group also discussed whether suppliers may be required to register and undertake qualification under the new MDR user role that will be created by SEC MP162, but it was explained this was ruled out by the SEC MP162 working group as being too costly and burdensome for suppliers.</p>
Further Actions	The group discussed the matter at length, noting the costs and challenges associated with either allowing MHHS-related TRTs of less than 24 hours, or implementing requirements that ensure the same TRTs are applied to those making MHHS related service requests to DCC systems, whether they are a supplier or not. The group concluded it was necessary to fully establish whether there was an essential need for TRTs of less than 24 hours for any MHHS related DCC service requests, and that this should be determined by the Smart Market Segment Sub-Group (SDS). One member questioned whether it was yet fully accepted that suppliers should be subject to the same TRT for MHHS data as non-suppliers. The group agreed the matter must be discussed by the SDS and a view provided on the potential frequency, volume, and potential costs of allowing TRTs of less than 24 hours for non-suppliers. Following this, the DAG will consider the required next steps.