

## MHHS Design Advisory Group Minutes and Actions

Issue date: 21/03/2022

Meeting number	<b>DAG006.1 (Extraordinary)</b>	Venue	<b>Virtual – MS Teams</b>
Date and time	<b>17 March 2022 10:00-11:30</b>	Classification	<b>Public</b>

### Attendees:

#### Chair

Justin Andrews (Chair)

#### Role

Chair

#### Industry Representatives

Andrew Green (AG)

I&C Supplier Representative

Craig Handford (CH)

Large Supplier Representative

Ed Rees (ER)

Consumer Representative

Gemma Slaney (GS)

DNO Representative

Gurpal Singh (GSi)

Medium Supplier Representative

Jo Bradbury (JB)

Small Supplier Representative

Keren Kelly (KK)

National Grid ESO

Morven Hunter (MH)

iDNO Representative (on behalf of Donna Townsend)

Robert Langdon (RL)

Supplier Agent Representative

Seth Chapman (SC)

Supplier Agent Representative (Independent Supplier Agent)

Stuart Scott (SS)

DCC Representative (as smart meter central system provider)

#### MHHS IM

Fraser Mathieson (FM)

PMO Governance Lead

#### Other Attendees

Danielle Walton

Ofgem (as observer)

Martin Crozier

MHHS IPA Design Assurance

Vlada Petuchaite

Ofgem (as observer)

### Apologies:

Colin Bezant

MHHS IPA Design Assurance Lead

Donna Townsend

iDNO Representative

Matt Hall

Elexon Representative (as central systems provider)

### Actions

Area	Action Ref	Action	Owner	Due Date
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
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## Decisions

Area	Dec Ref	Decision
None		

## RAID items discussed/raised

RAID area	Description
None	

## Minutes

### 1. Welcome and Introductions

The Chair welcomed attendees and provided an overview of the meeting agenda and objectives.

### 2. 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<sup>1</sup> 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.

The Chair provided an overview of the level playing field design principle:

***“All market participants, operating under MHHS Target Operating Model, will be afforded the ability to deliver the same level of service for the same MHHS service”***

### 3. Level Playing Field

FM introduced SEC MP162 and provided a brief overview of the solution currently under consideration by SEC parties. FM stated the central question for discussion was whether SEC MP162 sufficiently enacted the level playing field principle.

GS expressed support for the principle and summarised the issue at hand as being 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 is reasonable the response times for suppliers are different 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 field principle from this perspective, and GS expressed uncertainty on whether supplier service requests can be differentiated in terms of whether the request relates to MHHS data, 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.

GS highlighted the current impact assessment being undertaken by DCC in relation to SEC MP162 and noted its scope does not include this question or assess the cost of either providing monitoring and assurance of the TRTs applied to supplier MDR service requests, or the impacts of allowing non-supplier parties to receive TRTs of less than 24 hours.

The Chair advised there had been discussion with the SEC Ops Chair on this subject and some potential options existed to enforce the level playing field principle, each with their own impacts. SC queried what the role of DAG was in relation to SEC MP162. The Chair explained the MHHS Programme is working closely with the SEC Secretariat to consider whether SEC MP162 sufficiently enables the principle and to identify current known inputs, and how additional requirements which may arise during design work can be catered for in SEC and DCC systems as MHHS progresses.

#### TRTs of <24 hours

The group discussed whether there are any requirements for TRTs of less than 24 hours for parties undertaking MDR who are not suppliers. It was noted that at present, SEC MP162 is progressing on the basis there is no such requirement. SC highlighted an MHHS design document that includes a TRT of less than 24 hours to fulfil requirements relating to

<sup>1</sup> SEC changes required to deliver MHHS. Available [here](#).

meter de-energisation use-case. The Chair noted a potential inconsistency in a tranche one TRT requirement for de-energisation but not for a meter exchange use-case. RL highlighted potential ad hoc service requests that could require a response time of less than 24 hours. SS noted ad hoc requests could be scheduled to operate on a 24-hour TRT and this is currently the case for other ad hoc requests.

The Chair considered whether there was in fact a need for certain service requests relating to MHHS data to have a TRT of less than 24 hours and asked whether this should be discussed by DAG or the Smart Market Segment Sub-Group (SDS). DAG members agreed it was essential to answer this question and the input of the SDS was required. SC and SS agreed, expressing that determination of whether there is a need for MDR for <24 hrs TRT for MHHS (in limited rare circumstances) thereby ensuring costs are accurately forecasted and not incurred unnecessarily. The group considered whether, given the likely cost of enabling MDR service requests for MHHS with TRTs of less than 24 hours, DAG should decide to preclude these from the design outright. The group agreed further information was required as to exactly what scenarios may require shorter TRTs, what the likely volume and frequency of such service requests would be, and what the cost implications would be for suppliers and DCC systems. The group agreed this matter should be considered by the SDS group.

**ACTION DAG06.1-02: Programme to consult the Smart Market Segment Sub-Group (SDS) 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 these scenarios, and cost implications for suppliers.**

### **Implications for DCC**

GS highlighted the materiality of this question to the impact assessment conducted by DCC on SEC MP162. SS responded the impact assessment has already been returned to SEC parties, and it indicates a requirement for TRTs of less than 24 hours would carry a cost in the tens of millions. SC highlighted this cost indication was based on assumed levels of service requests and that it may be important to define this further to obtain a true indicative cost. SS agreed that undefined risk must be priced accordingly. SC believed suppliers would be likely to use their existing on demand functionality to undertake MDR and obtain a 30 second response, and this too would influence the validity of the DCC impact assessment.

### **Supplier Constituency Views**

GSi provided a view from the medium supplier constituency, agreeing that further clarity is needed on why a potential TRT of <24 hours may be required for de-energisation and meter exchange use-cases. GSi reminded the group the current position of the MHHS Programme is that TRTs of less than 24 hours for service requests relating to MHHS data are not required, in accordance with the notion that requests will be scheduled. GSi urged assessment of this, and the potential associated costs, from the perspective of benefits to consumers. SS agreed and added the materiality of risk to settlement should also be considered.

SC highlighted discussions at the SEC MP162 working groups where it was decided that TRTs for 30 second supplier on demand requests would be restricted or the TRT raised to 24 hours. SS added that the possibility of suppliers being required to register under the new MDR role proposed by SEC MP162 to ensure the 24-hour TRT is applied to their MHHS requests was rejected early on by the SEC working groups as being an unnecessary cost and administrative burden. This meant the possibility would remain that suppliers could use their less-than-24-hour service request route to undertake MDR for MHHS data, contrary to the level playing field principle.

GSi noted suppliers would need to assess their individual risks and costs exposures in relation to TRTs of 24 hours, in terms of whether certain data can be estimated, scheduled, and what risks to consumers exist. The Chair agreed and suggested this is something for the SDS group to bottom out.

### **Potential Options to Enable Principle**

The DAG discussed options for ensuring a level playing field, given the potential costs of allowing TRTs of less than 24 hours but considering the ability of suppliers to make on demand requests with a shorter TRT. The Chair considered whether performance assurance could be put in place to monitor whether suppliers were using the on-demand functionality for MHHS data, and whether this could be housed under the SEC performance regime which is currently under development. GS advised this would be difficult to make work in practice as there is currently no way for DCC systems to differentiate between a supplier service request that is for MHHS data and one that is not. As such, there is currently no effective way to define what TRT should apply to a given request and monitor whether on demand service requests are used appropriately.

SS advised the notion of monitoring was discussed at the SEC MP162 working group and it was determined system changes would be required to differentiate service requests. GS considered effective monitoring would require either suppliers to register and qualify under the new MDR user role, which is not practical, or a flag in DCC systems to enable

suppliers to denote requests that are for MHHS data, which would likely have a significant cost attached. In any case, such a flag would not preclude on demand requests for MHHS data in contravention of the level playing field principle.

GSI cautioned against any detailed consideration of assurance before it is fully agreed suppliers must use the 24-hour TRT for MHHS data requests. The Chair responded this was the current MHHS assumption, otherwise a level playing field would either not be possible or significant cost would be incurred in allowing TRTs for MDR of <24 hours.

The group concluded there was not an easy answer to this and discussion by the SDS group was required before there is value in discussion potential solutions further. The key question to is whether TRTs of <24 hours are essential for MHHS-related MDR service requests and if not, how an appropriate balance can be struck between the existing functionality suppliers have to make on demand requests and the difficulty in assuring these are not used for MHHS purposes.

GS believed the level playing field principle requires that all MHHS-related TRTs must be the same for any party. GSI disagreed with this. RL believed it was reasonable to assume the cost of allowing agents the ability to make MHHS-related requests with a TRT of <24 hours would be high as a high frequency of such requests would be presumed likely.

#### 4. Further Actions

The Chair summarised how this matter would be taken forward (see actions above), noting discussion by the SDS was needed on whether there is an essential need for TRTs of less than 24 hours for MHHS-related MDR. An understanding of the volume, frequency, and costs of such requests is also required to inform the materiality of any such requirement. Work may then be required to assess how feasible assurance may be, given the challenges discussed.

#### 5. Summary and Outcomes

The Chair confirmed the meeting actions and invited any other business.

GSI believed DAG should consider how programme interactions with the SEC modification process are managed, to ensure effective engagement and awareness. The group agreed this was necessary, noting actions at the previous DAG meeting for the Programme to consider how it engages with SEC and specifically SEC MP162. The Chair agreed to place a further action on the Programme Design Team to consider closer working with SEC and whether a joint working group is necessary. SC believed added it was relevant to inform SEC of the likely upcoming changes to the Programme milestones related to the recently issued Programme Change Requests.

<b>ACTION DAG06.1-02: Programme to 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</b>
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The group noted the next DAG would be held 23 March 2022.

The Chair thanked members for their contributions and closed the meeting.