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## MHHS Design Advisory Group Minutes and Actions

**Issue date: 28 July 2022**

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Meeting number **DAG012**

Venue

**Virtual – MS Teams**

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Date and time **21 July 2022 09:30-13:30**

Classification

**Public**

### Attendees:

#### **Chair**

Justin Andrews (Chair)

#### **Role**

Chair

#### **Industry Representatives**

Craig Handford (CH)

Large Supplier Representative

David Kemp (until 11:41)

SECAS

Donna Townsend (DT)

iDNO Representative

Gareth Evans (GE)

I&C Supplier Representative

Gemma Slaney (GS)

DNO Representative

Jo Bradbury (JB)

Small Supplier Representative

Jon Spence (JS) (On behalf of Matt Hall)

Elexon Representative (as central systems provider)

Neil Dewar (ND)

National Grid ESO

Robert Langdon (RL)

Supplier Agent Representative

Sarah Jones (SJ)

RECCo 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

Ian Smith (IS)

Design Manager

Miles Winter (MW)

PMO Governance Support

Nicole Lai (NL)

PMO Governance Support

Simon Harrison (SH)

Design Assurance Lead

#### **Other Attendees**

Colin Bezant (CB)

Independent Programme Assurance

Danielle Walton (DW)

Ofgem

### Apologies:

Ed Rees

Consumer Representative

Matt Hall

Elexon Representative (as central systems provider)

Vladimir Black

Medium Supplier Representative

## Actions

Area	Action Ref	Action	Owner	Due Date
<b>Minutes and actions</b>	DAG12-01	Provide material updates on any ongoing actions at next meeting	Programme (PMO)	28/07/22
<b>Level playing Field Design Principle</b>	DAG12-02	DCC to share docs where 6am read response time working practice is contained	DCC Representative (Stuart Scott)	25/07/22
	DAG12-03	Arrange a joint working group with SEC parties, DAG, and Programme to discuss SEC MP162, and seek to identify solution which delivers requirements of the MHHS TOM and adhering to the level playing field design principle, taking into account requirements, costs/impacts, and implementation date	Chair	26/07/22
	DAG12-04	Seek guidance from SRO on Programme position on SEC MP 162	Chair	25/07/22
	DAG12-05	Discuss with DCC high level impacts SEC MP162 solution options and seek further understanding of flexibility in decision date and implementation	Chair	26/07/22
	DAG12-06	Think of the impacts / implications of each of the proposed Options in preparation for meeting with Change Control Board, SEC MP162 WG.	DAG members	26/07/22
<b>Previous Meeting(s)</b>	DAG06-01	Review alignment between related MPAN modifications and design subgroup	Programme (Ian Smith)	13/05/2022
	DAG09-05	Programme to liaise with Programme Participants who have queries on the Programme Design Team's responses to comments on the Tranche 1 design artefacts	Programme (Ian Smith)	08/06/2022
	DAG09-12	Provide a clear plan for the resolution of the recorded outstanding issues related to the Tranche 1 design artefact approval	Programme (Design Team)	25/05/2022
	DAG10-06	Update the Target Stakeholder Outcomes and Baseline Success Criteria based on suggestions of DAG members	Programme (Warren Fulton)	06/07/2022
	DAG10-07	Update the Conditional Approval Process and Work Off Oversight Process and present updates at the next DAG meeting	Programme (Warren Fulton)	06/07/2022
	DAG10-08	Update the MHHS Design Baseline Dashboard to show more detail (e.g. next steps and timings)	Programme (Ian Smith)	06/07/2022
	DAG10.1-01	Discuss transition timetable and go/no-go decision with MH	Programme (Ian Smith)	06/07/2022
	DAG10.1-02	Clarify to JB the optimal communication routes and contact addresses/points of escalation within the Programme	Programme (Claire Silk)	28/06/2022
	DAG10.1-03	Communicate current thinking around transition plan to DAG members	Programme (Ian Smith)	06/07/2022
	DAG11-01	Provide draft plan on transition requirements at next DAG meeting	Programme (Ian Smith)	28/07/2022

## Decisions

Area	Dec Ref	Decision
Minutes and Actions	DAG-DEC-28	Minutes of DAG meeting held 6 July 2022 approved

#### [RAID items discussed/raised](#)

RAID area	Description
Level Playing Field Principle	The DAG agreed any Programme risk contained with the RAID log relating to Smart Energy Code Modification Proposal (SEC MP) 162 should include reference to the governance implications for MHHS design and industry codes

#### [Minutes](#)

### 1. [Welcome and Introductions](#)

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

### 2. [Minutes and actions](#)

#### **DEC-28 Minutes of previous meeting approved.**

SC noted that a lot of actions are with individuals and that there is no real visibility other than that they are ongoing. SC requested the DAG receive a progress update at the next DAG.

#### **ACTION DAG12-01: Programme to provide material updates on any ongoing actions at next meeting**

FM noted regarding DEC11-03, Simon will present a slide around that action under the 'Design Decisions' agenda item. FM concluded the action review.

### 3. [Level Playing Field Design Principle](#)

The Chair introduced the item that the action at the last DAG was the Programme had put options together and issued them for DAG to provide feedback on. The Chair noted feedback had been received from RL and SS. IS had consolidated these responses and CH noted he had provided a late response. The Chair summarised the DAG agreed at their last meeting, the 24-hour TRT met the requirements of the TOM, however, the group believed there was a level-playing field design principle issue. This is due to the MP162 solution introduces a differential read window.

The Chair reiterated a successful outcome for today is to understand different impacts from the various options and to agree how to progress. Regarding timing, the Chair stated after the SEC change board meeting on 27/07/2022, Ofgem will receive this for decision in August. The Chair reinforced that the Programme needs MP162 to deliver the DCC capacity for HH meter readings for MHHSTOM, and for the establishment of the MDR role as specified in the MHHS Target Operating Model (TOM).

GS asked regarding the solution for peak and off-peak windows whether the intention is not to define these windows in legal text anywhere. DK replied no, the window is not set out specifically in the SEC legal text but in the solution requirements.

GS questioned that DAG was having this discussion as it was not specified in the SEC legal text. SS said the 'read' window was specified in a working practice and consideration needs to be paid to this, as there is a disconnect in terms of the requirements outlined in the SEC and the solution, resulting in these queries.

The Chair confirmed the legal text in MP162 does not go into this detail, and if DAG had a view that the solution should be different, or there should be a delta, then the impact could be on cost and time scales to implement a solution to meet the requirements of MP162.

IS presented the Level Playing Field RF1 Responses. IS said following the last DAG, several conversations were held with DAG members regarding fleshing out options.

Regarding Option 2b, GS challenged where the definition of the 'existing scheduling window' came from and if it was from the DCC. GS stated they understood users are putting in their requests at the DSP schedule at midnight, then it's first in first out. IS responded the delivery is enacted in that scheduling window between midnight and 6am, which reflects the current position.

GS said they were not sure there was an existing scheduling window as such, or it was happening within the current timeframe because that was what the DCC was currently capable of dealing with. This timeframe may increase as the demand starts increasing. SS replied there is currently a single scheduling window, and the underlying requirement is the non-settlement requirement of energy suppliers to get those reads back by 6am. Going forward for all users, if they start using more schedules, this is part of ongoing capacity management processes to scale out. They used 'existing scheduling window' because it is right and proper that that is always under review going forwards as the service scales out, irrespective of this change or any other changes. Currently, if you were to set up schedules for any user, they would all go in that same period because it is the existing functionality.

GS asked if this was the case even if demand was high. SS replied yes. Ultimately, it is about recognising that DCC has up to 24 hours to process these scheduled responses.

CH asked SS to clarify whether is a contractual requirement for suppliers regarding the non-settlement data between midnight and 6am. SS responded it is a working practice rather than a contractual requirement that is not formally documented.

The Chair checked if participants schedule requests to get data from the smart meter, the actual SLA is 24 hours. SEC states there are 24 hours from that start point, but DCC are currently operating at a shorter window as they are not at scale, and to meet the working practice agreed for energy suppliers.

The Chair checked the current working practice is that suppliers, and suppliers only, get all their readings back at 6am. SS confirmed yes, adding this also applied for non-settlement purpose.

RL asked if that applies to any user. SS said yes it applies to any current user, because the traffic to meet these existing profiles is relatively low.

CH asked how one differentiates when suppliers put in their schedule requests. SS said there is no differentiation and DCC is unsighted on its purpose because there is no requirement for checking purpose. RL checked this data is used for settlement purpose. SS replied there is no direct requirement for settlement yet.

Regarding SEC MP162, The Chair asked if there is a current scheduled SLA within 24 hours, but the working practice is going to change such that suppliers only, or suppliers / distribution businesses / other users, get it by 6am. SS said DCC will maintain the current working practice for any existing supplier traffic and create any additional windows for new requirements that come in for all users: MDR parties for all the settlement traffic and all the export requirements for suppliers will be put in the later window.

GS wanted to check with SS whether, as a DNO, their requests will go through an existing window. SS said regarding SEC MP162, DCC have introduced a design concept that says depending on the user and service request, they can move traffic around across the period. The implementation of SEC MP162 starts to do that for the market-wide traffic which effectively says the export reading for any party, regardless of role, can go later. The existing traffic can stay to meet the working traffic. They have not spoken about other traffic as that is outside the scope. GS said they recall the SEC Mod report putting existing users in the peak window. SS said existing traffic stays where it is.

SS said they know there are additional challenges to scaling overtime that are not part of SEC MP162. When they say 'existing' they mean 'existing forecast demand', which may not necessarily coincide with GS' situation.

The Chair summarised that for other non-settlement traffic, scheduling/capacity management is handled by a normal operational forecast. If the forecast stays as it is, DCC are still intending to meet DNO requests, and other user requests, by 6am. SS agreed and said this is the current position, but this may change outside of SEC MP162. The Chair asked whether this was based on the current forecast. SS said yes.

GS noted the users don't forecast anymore, as this changed in the SEC model. DNOs no longer submit forecasts, and DCC do their own forecasting looking at historic data, rather than users saying what they predict. This brings more accuracy.

SS said at a high-level, there are a lot of demand capacity challenges, yet this is separate from SEC MP162, and has been around for a while.

SC noted the windows the group records on the spreadsheet are wrong. It is midnight – 7am, then there is an off-peak. GS added that there is one until 8.

SS said to avoid complexity, the high-level principle of SEC MP162 is effectively it allows the DCC to schedule more intelligently within the window of the 24 hours to meet the requirements of as many different parties as possible whilst spreading the load of capacity peaks. The actual implementation can shuffle around overtime, as whatever windows set today are likely to change going forward as demand patterns change.

SC said they were surprised that the SEC MP162 got to a place where there were no defined user windows. GS said the understanding was that with SEC MP162, suppliers don't want normal reads to come back before the working day starts, whether they can request or expect it is a different expectation. With regards to on-peak and off-peak, it is to deal with settlement, and GS is of the understanding that as far as they are concerned as a DNO, they will set up their schedules at midnight and they expect DCC to give them the response by 23:59, and DNOs are building processes around that 24-hour response time.

SC said this change impacts all parties and there are groups of parties where they've not said what is going to happen. GS said the DNO's broader perspective is it is up to DCC to manage their network, and the bigger challenge DNOs have got is how likely is it going to happen to this SEC MP162 given the current challenges in the law. This is a separate issue, but this is where DNO's bigger concerns are regarding SEC MP162. Until proven otherwise, they will assume it will work as it is supposed to work. SS agreed with GS and established again that all schedules will be back within 24 hours.

The Chair wanted clarification that currently within the SEC, you get reads back within 24 hours, but it is a current working practice that existing users get all their scheduled reads by 6am. The Chair asked what legal enforcement is in place to make this happen. GS responded there was none.

The Chair wanted to confirm there is no recourse. SC confirmed there is no recourse, however some suppliers have suggested if their schedule window extended outwards, due to their existing business processes required the data back within that existing timeframe, they would stop their scheduled requests and start using on-demand requests instead to obtain the required data, which is a 30 second TRT. There is no legal comeback, but suppliers could change their activity, which would impact DCC's systems and TRTs. CH stated that he has no issue with the change apart from the cost, which is a fundamental issue. Option 0 for suppliers is that they've got what they need to meet the requirements of settlement and the changes that are needed, DAG need to ensure other participants also get equal access to the settlement data.

The Chair asked if any more clarification was needed on what SEC MP162 is now and what it delivers. The solution states suppliers will get their settlement readings by 6am, or that first-peak window. SS said there is no differentiation between settlement and non-settlement.

RL asked CH a question about the view of the large suppliers and wanted clarity that this is the view of large suppliers where they are completing SDS activity in-house. CH says this is the view of the SEC MP162 proposal. Fundamentally no issue as it stands, but it is the cost that is the significant problem. SC said if an independent agent wants to do it, they should do it, but to get the functionality it's down to suppliers to pay to make that change. Suppliers are asking how that is fair to pay for the benefit of other parties. The Chair checked what RL was trying to make clear is that if a supplier wanted to provide an MDR role for another supplier at an independent agent, then they will be happy with a later window. GS said what they have heard from suppliers is why should they pay for functionality they already have, and those that don't use it have to pay for it. The question is why they are making consumers pay for something that they are, in essence, already paying for. RL stated this answered his question.

GE said it is a fair point for suppliers to ask why they pay for it, but for most suppliers they cannot justify paying the cost. Most suppliers do have third party activity do this. GE wanted to know where this lands for the programme in terms of conversation. If there are concerns for payment over SEC, it feels more like a SEC type problem that needs to be solved there rather than solving it here. GE stated the group should stay focused on what MHHS means, which is to create as level a playing field as possible.

SS wondered if one could remove the working practice for suppliers, why not reduce the cost for all suppliers to help with demand for later years. RL asked what 'removing the working practice' meant. SS replied not scheduling everything with a hard limit of 6'o clock and bring down the total peak capacity.

The Chair said there was a separate issue on how this working practice is governed and clarified that Option 2b is about extending the window. GS said there is risk that if we take the off-peak window out and spread it across 24 hours, suppliers change their behaviour and request on-demand, which will cause a lot of challenges in the DCC network.

For Option 2b, GC asked SS if it's a low, medium, or high increase of cost. SS said not enough analysis has been done. Currently, it is high level.

SS clarified that Option 2b would reduce DCC costs for MP162 solution. CH said he was unsure if Option 2b sits with the suppliers regarding cost, it is a SEC issue. Fundamentally, a group needs to resolve the cost issue and the cost recovery. All cost recovery goes back to suppliers.

GS raised a question around what SEC MP162 is trying to achieve. The modification report says SEC MP162 'creates an MDR role so that they can talk to the DCC, stating what service requests they can and cannot send...' but does not mention anything about capacity for additional traffic.

GS also noted REC change 44 does not complete the solution. There is a need for holistic solution of how it will work. SJ said they were struggling with the governance question, and it feels like the principle under the SEC is that DCC manages the capacity. In low-level documentation, it is not defined anywhere in the code. SJ struggled to understand what the outcome is going to be, and that it would be a whole new SEC Mod to put a requirement on DCC to manage its capacity in a certain way. SS replied that these options have been on the table for working group discussions.

The Chair asked DAG how we can go move forwards from here once we have gone through the options.

RL proposed to remove the windows completely from the Mod.

Regarding Option 1, The Chair asked RL if the MHHS settlement requirement is a TRT or a response time requirement. SEC MP162 has introduced a higher requirement of response time for a certain market segment, i.e., suppliers. The Chair added there is an existing peak window, per working practice, which covers everything pre-MHHS.

The Chair asked SS if the principle of that peak window has been extended to MHHS. SS responded only by nature of meeting the existing working arrangement; it is an unintentional, unavoidable consequence, as all solutions layer on what comes before it, which is a point that always needs to be considered.

CH noted this has gone through several parties, but is struggling to understand who is making the decisions and where DAG's responsibility comes in. CH said DAG need to be clear about our requirements and which of these options is least contentious. CH stated fundamentally suppliers and customers paid for this once, and they are now being asked to pay for another change that does not give benefit to suppliers.

SC said they couldn't put magnitude costs against these and the impact. What they are trying to do is get an indication of the cost/financial impact of these productions.

SS said when introducing SEC MP162, DCC managing the capacity was always part of the scope. SS reinstated there is no capacity in the DCC today to support the extra traffic and this is what SEC MP162 is adding in. The question is how much additional capacity based on the target operating model.

GS checked Programme Participants need to read half-hourly consumption data for settlement (the plan for the programme), and right now a supplier can read this data, but they are just reading it differently. SS replied that suppliers don't get that data set for every meter, as of today. The export usage is back to zero.

SS dispelled the myth that as of today, the capacity matches it. RL asked if the capacity is there to meet the demand if 100% is done by suppliers. SS replied that as of today, no. This goes back to the wider DCC capacity Mod, as DCC are not at scale yet.

The Chair clarified the Programme needs SEC MP162 to deliver two things: the MDR role specified in the TOM and the capacity to read half-hourly data across 30 million smart meters, whether that is collected by MDR, independent agent, or supplier. The extra capacity is needed regardless.

The Chair added a further question: of that quoted £900m of cost, is that cost driven because of the 75% of readings that need to be collected in that peak window? SS replied that they do not have the data to hand, as it was never a request to split it that way.

RL asked if any of the cost is due to increasing demand. SS said there is a large cost increase by additional demand, and this will not happen in SEC MP162 in its own right. SS reiterated SEC MP162 started by examining user behaviour and has costed capacity based on this. The Chair summarised SEC MP162 is there to increase cost to meet capacity, i.e., to make 30 million half hourly readings.

The Chair confirmed the DAG agrees that the 24-hour TRT is what is needed for MHHS. What was agreed in the previous meeting is the differential read window creates an issue for the Programme because of the level-playing field principle. The group put together several options to try and come to a way forward on resolving that issue of level-playing field, and this is what these options are.

The Chair expressed concern that the group is redoing the work of SEC MP162. The Chair asked where we are going to land as a DAG on any of these options that may or may not address that level playing field issue. On one hand, there is Option 0: no change to MP162 solution, where suppliers are saying they're happy with SEC MP162 as is and that has no impact on DCC or the programme. However, from a level-playing field principle for independent agents there is an issue.

CH said one can also argue from a level-playing field, the cost for suppliers is unfair. The actual change that is happening is the cost. The Chair said that you could argue that there is additional capacity that is needed, and x% of that £900m is needed whether you have the MDR role or not.

Looking at this from a level-playing field perspective, GS noted it is a case of ignoring the costs and understanding if this Mod is implemented as described with these windows, whether there is a detrimental impact to agents not getting their data until the afternoon, knowing suppliers will get it before 6 o'clock. It is not a level-playing field because suppliers are treated one way, and MDR another way. Regarding how settlement will work, GS was unsure whether this was a big enough impact to cause a level-playing field.

IS replied from a pure settlement perspective it is manifested in a shorter time to process consumption data to meet settlement timing issues. The other problem that weighs into this is there

are differential requirements in terms of the use cases. IS suggested the group needs to come to an agreement on what the problem they are trying to solve is.

RL clarified it is large suppliers doing this in-house, as medium suppliers are unlikely to do this in-house. GE agreed with RS and noted there are a range of supplier views. JB said there is no opinion within their group, and we will start getting views from the smaller supplier constituency soon.

The Chair asked if any of these options could be ruled out. IS said from a time scale perspective, Option 6 and 7 are probably not feasible. The Chair agreed with IS and noted Options 6 and 7 require years' worth of discussion. The group would lose a year by setting it up and defining the requirements.

SJ came back to the point about what the group is trying to achieve regarding discussion of options; the mod is going next week and there is no time to develop an alternative option. SJ checked if the group is trying to put arguments together to feed into that decision making so it goes to Ofgem when considering the competition aspects of the change. The Chair replied one outcome could be the DAG say SEC MP162 delivers the requirement for 24-hour TRT that the Programme needs, but from a level-playing field principal perspective, the group believes there is an add-on change to SEC MP162 to do xyz. This could go into SEC drafting after the design is baselined.

GS replied that SS said the SEC MP162 is built on off and on-peak windows. If we wanted to change that in any way, we would have to look at SEC MP162 solution almost from scratch again. If that is not an option, as a programme, the group needs to be happy that these off and on-peak windows are fine from a level-playing field perspective, and as a design it ticks off all the needs. Alternatively, the off-peak window is an issue with level-playing field and competition, so SEC MP162 cannot progress. GS said SS's solution is not high-level enough to move the goal posts underneath. SS agreed, because if level-playing fields are the trump cards, then this will introduce a new requirement that will go into the SEC Mod to say one must treat all service requests equally and deliver them with an equal time frame. This new requirement will ultimately drive a different solution because we would have to drop the two windows and either have one short window at the top that would increase capacity or spread it over the 24 hours.

IS asked SS if there are any options that could be progressed as a delta to SEC MP162. SS said it comes back to what the requirement is. The group needs to agree on a requirement. Unless there is a firm commitment, it will come back the same.

The Chair said they cannot see why Option 1, 2a, or 2b, or 2c, couldn't be a delta to the solution that has gone through SEC MP162. It could be a separate mod that progressed quickly. IS wondered when the fundamental capacity increase and role creation is required, then what elements would be exposed to regret spend. For example, if Option 2 were to be delivered, and the group understands it is a sub-set of anything required in the future – whether a delta that says a further increase in capacity is necessary would enact anything in SEC MP162. It is the regret spend question. DK said if these new solutions reduce capacity, it would already have been bought. Their gut feel is there would be a fair amount of regret spend because the timeline would be longer.

GS said to DK they are unsure how to bring to the change board that this modification has brought in a MDR role and the capacity to make MHHS work, but one cannot argue the business case because the group do not know how much it will cost to put in.

The Chair affirmed the capacity is fixed; it is a matter of how the capacity is allowed over a 24-hour period. You either have your six-hour window with increased capacity and you're adding another 25% in that window, or the big capacity you have in that six-hour window is not that big because you've smeared it over 24 hours.

GS suggested, at some point, there must be a limit on how much you spend to make it work. GS expressed uncertainty as to how you vote or sign off. IS said if you recognise the MDR role is a requirement that is not going to move, and you assume you don't deviate from a position of significant amounts of consumption being required in the scheduling window, then if you find any variability in

that that says a future change would just be bounded by an increase in capacity in that window, the question then is would that provide parameters to frame options.

SS said the functional changes needed to implement this is straightforward. The user-behaviour angle on this, regarding market demand and set-up, was always the contentious part of this mod. It drives different solutions and costs.

The Chair asked if, moving forward, we bound our deltas. The two options are that the delta is an additional 25% in the six-hour window, or an additional 25% in a longer window. SS responded if there is a level-playing issue, having the concept of multiple windows does not work. You need to have a single scheduling window as that's what drives the cost.

The Chair asked if people agree on the delta. SC disagreed with the statement because we need to change the nature of the request. SC said there are other options, rather than the delta that is just there.

CH asked for comfort on how we got to 25%. The Chair said it was on the assumption 75% of meters would be serviced by suppliers, rather than independent agents.

The Chair asked what if DAG don't decide today and posited what would happen. GS said regardless of whether DAG decide or not, it will go to change board next week, and the current response is not positive. GS noted whatever happens next week goes to approval with the board anyway.

SC asked about the difference between the interactions and the codes. GS replied when this got raised DCC will be told what is in the registration data. You cannot implement SEC MP162 without the REC change, which has just gone out for impact assessment. This still does not complete the picture, because the REC change does not tell GS who the MDR is.

The Chair reiterated the position of the DAG is these mods must be raised due to their timescale to implementation. GS challenged this as they were unsure why SEC MP162 was raised as a mod in the first place.

SC repeated the importance of understanding what the DAG's opinion is contributing towards. CH said there are fundamental questions that the DAG cannot answer, but if Ofgem got involved they would want to decide on this.

SJ went back to the point about the REC mod and said they are not overly comfortable progressing with the REC outside of the programme. SJ said in terms of REC change 44's solution, it has gone out for impact assessment to understand the cost and the timescale, but when it comes back, they are not expecting to progress it as a REC change. It is about which bits fall in the programme change versus independent code changes, and who has the overarching view. It will not work if the pieces are unaligned. SEC MP162 is a good example of the coding and governances around the changes.

GE said they agree with a lot of the statements regarding how these things are managed going forward. SEC is going to change board next week, so this mod is going forward. Everyone will know what the group says, DAG just need to summarise what has been said. Looking forward, it is important to make sure this does not happen again. DAG spent a lot of time discussing a mod that is attached to what it is doing but is being progressed outside of the Programme. There was a lack of clarity on what DAG is expected to do on this. The group must have clarity on what MHHS is doing on these changes, then provide a formal opinion once the job is done.

The Chair asked from a design perspective, if it is agreed, additional capacity is needed under the SEC to get half-hourly data for MHHS. The group agreed. RL noted the DCC needs to meet the demand for processing half-hourly data for smart meters as specified under the TOM.

IS confirmed the best DAG can do is extend a consideration. An element of question is whether DAG views SEC MP162 as able to progress and be modified in the future to address level-playing field concerns.

The Chair asked if we need the SEC to deliver the functionality to enable a MDR role to initiate the TOM. The DAG agreed.

The Chair queried if SEC MP162 delivers those two things. SC said not necessarily, because it might not have the capacity needed. The Chair clarified it provides the capacity it needs for a 24-hour TRT.

The Chair reaffirmed the SEC MP162 solution, with the differential read window, gives the Programme an issue with the level-playing field design principle. GS agreed the solution defined in MP162 does not meet the level-playing field principle.

The Chair asked if DAG believe SEC MP162 can be modified with a delta to deliver Option 2a and 2b. GS said yes prior to it going to a change board vote, but no after it has been approved or rejected. SJ agreed. SC said it could be changed, but it would be inappropriate.

The Chair checked from a cost benefit perspective, as a DAG, there is no mileage in 2a. SC said that as part of whatever we say, if competition is large, we may end up with NDRs and a peak window at 100% anyway. If the competition is too large, the solution will not work.

The Chair explored SC's statement: if there were no NDRs, how would that additional capacity be governed or funded in the normal operation of the DCC. SS responded if the variables change in terms of the volume forecast, any delta difference would be picked up as part of the route. This risk has been articulated in the mod.

The Chair wondered if 2b is the best option out of all of them to meet the level-playing field principle. SS said purely from a DAG perspective, then 2c is the only one on the plate, and there needs to be a conversation about working practice.

SS said if DAG choose any of the options, the issue is moving. SC offered that as DAG, the group cannot offer an option as this is a SEC Mod and outside the Programme. SS responded the group ought to state why certain options are not viable to help inform SEC. The Chair replied what DAG need to reiterate is the base requirement is the 24-hour TRT; there is still a level-playing field issue because of the differential read windows in SEC MP162. The solution associated with SEC MP162 can be modified to address this level-playing field principle, but this would need to be before the change board vote. CH said yes, but the group needs to be clear on what their requirements are first and foremost. The group should not muddy the waters between requirements and solutions.

The Chair responded DAG's requirements are to meet the design specified in the TOM, which includes the role of the MDR, and the TOM shows this can be delivered by a supplier in-house or by an independent agent.

The Chair asked if having a discussion with the DCC about a change to the existing scheduling window - which roughly covers Option 2a, 2b, and 2c – would be helpful. DT responded he was not sure it would be possible, as he is unsure what the group can work with as true. SC raised it may not be as simple as talking to the DCC. There would be a further charge to do an assessment. DT reminded that talking to the DCC would not answer the supplier question.

DT reminded, as DAG, the group alone cannot solve this. It can only be solved between the two groups of people working together: the current users and programme experts.

DT said there is a 25-day working turn around, which in this case feels short; the timescales are all built around delivering this by August. It will be difficult to facilitate the SEC board being any later.

The Chair wanted to seek guidance from SRO. The Chair said as DAG, they need a wider meeting to try and work out if there are other solutions which deliver the TOM, which already has set requirements, as well as the implications of the level-playing field principle. GS wanted to know how this ties into the change board, and whether SS would ask DCC to withdraw from the change board in the interim. GS reiterated The Chair needs to consider things from a change board, as well as an Ofgem, perspective. The Chair said it makes sense to push change board back by a month.

SS said to The Chair if this conversation will happen, it won't just be a DCC decision and that SECAS need to be involved. CH said the third outcome is that people can't decide. CH's concern with the meeting is there will be a lot of voices in there and how a productive meeting can be ensured where consensus is unlikely to be reached.

GS asked if the Programme will speak to SEC on whether they feel there is no point going to Change Board next week once this discussion has been had on the outcome of the mod.

The Chair said a wider meeting is needed between DAG, the Programme, and SEC MP162 Working Group to try and work out whether there are other solutions that deliver the TOM and the implications for the level-playing field principle, considering the various sliders on dates, costs, and impact.

**ACTION DAG12-03: Arrange a joint working group with SEC parties, DAG, and Programme to discuss SEC MP162, and seek to identify solution which delivers requirements of the MHHS TOM and adhering to the level playing field design principle, taking into account requirements, costs/impacts, and implementation date**

The Chair reiterated the group had solidified its positions on requirements. The Chair put forward an action to speak to the SRO on their Programme position on this.

**ACTION DAG12-04: Arrange a joint working group with SEC parties, DAG, and Programme to discuss SEC MP162, and seek to identify solution which delivers requirements of the MHHS TOM and adhering to the level playing field design principle, taking into account requirements, costs/impacts, and implementation date**

The Chair noted they would also like to have a discussion with the DCC regarding high-level impacts. In this DCC discussion, the Chair would also like to further drill down on what CS said in the PSG about decision dates and implementation.

**ACTION DAG12-05: Discuss with DCC high level impacts SEC MP162 solution options and seek further understanding of flexibility in decision date and implementation.**

The Chair suggested an action for all DAG members to consider the implications of all the solutions for themselves and others, as preparation for the wider meeting.

**ACTION DAG12-06: Think of the impacts / implications of each of the proposed Options in preparation for meeting with Change Control Board, SEC MP162 WG.**

#### 4. **Review of RAID**

To be discussed in DAG 13.

#### 5. **Design Decisions**

To be discussed in DAG 13.

#### 6. **M5 Design Schedule**

To be discussed in DAG 13.

#### 7. **Summary and next steps**

The Chair thanked members for the contributions and brought the meeting to a close. The Chair noted whatever hadn't been covered today will need to be added to the agenda for next meeting and suggested to FM to extend DAG 13 to finish at 2pm.

### **Next meetings:**

**Standard DAG: 28 July 2022**