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Call for evidence: Review of the regulatory arrangements for the Data Communications Company

In response to Annex 1 of the Ofgem call for evidence letter, WPD feel that the DCC is key to the ability of Distribution Businesses to understand network conditions through the data provided from Smart Meters. Effective, accurate and timely information from the DCC is critical to enable core business activities to be developed and use the information to maximise benefits for all parties.

WPD has already implemented systems to look at some achievable benefits, though the timescales for realisation of benefits vary depending on the nature and quality of the Smart Meter data.
Where a single point of data from a single meter can provide a benefit, this can be realised relatively early into the roll out period.
Where a benefit requires the aggregation of data across a range of meters to provide an output, this benefit will only develop as the deployment and density of Smart Meters increases.
We are already making use of Smart Meter alerts
relating to loss of supply – AD1's, which are not proving as beneficial as first thought.
It was believed that as more meters are deployed this benefit would grow, with the alerts being used to understand the scope of an interruption at an earlier stage.

Due to compliance issues and the ability of service partners of the DCC to transmit the AD1 alerts efficiently and effectively WPD have had to design internal filtering systems in attempts to ensure only genuine alerts are sent through to our front line control centre for network investigation.
In an average month approx.75,000 AD1 alerts from the ~1.1million SMETS2+ meters capable of sending these alerts are received. Of which over 70% are automatically filtered out as spurious or part of firmware upgrades or meter installation/exchange works. Of the remaining 30% approx. 5% can be linked to known incidents, leaving the remaining 25% to be investigated further.
The vast majority of these alerts seem to be false alerts with only a handful being genuine and traceable.

As more meters connect through the DCC the issues with timely AD1 alerts seems to be growing. The proposal to improve efficiency through spending several millions of pounds on the DCC network does not seem to be the best use of DCC resource. There will be ongoing issues whilst the existing Comms Hub devices and firmware versions are still capable of sending an alert without the mains power failing.

Whilst WPD has in excess of 1.7 million DCC connected meters from the ~8 million supply points capable of receiving a Smart Meter, there are still lots of communication issues preventing accurate and timely information being received through the DCC network.

Work has starting on extracting load data from compatible substations with high enough penetration levels. Even this data is not always received for all requested supply points which makes evaluating load profiles difficult.

With SM penetration levels at 80% it is believed that accurate profiles can be designed and used for feeders, though if a further 5 to 10% of data fails to be usable this will reduce DB trust in the system and extend the timescales for reliable DCC data.

A reliable system where the data is accurate and usable is what is required from the DCC. It also needs to be cost effective or Distribution Businesses will invest in other alternative network monitoring systems to provide the data required and expected by customers.

Response to Annex 2 regarding regulatory compliance:

WPD acknowledge DCC costs are significant and feel there is a lack of transparency with additional costs and projects (i.e. DCC Boxed, unclear change process for signing off costs).

Service issues - particularly in CSP North where Arqiva have a lot of problems that give consistently poor service, although WPD only have a few thousand customer in this area the issue needs addressing.

We acknowledge DCC's positive (albeit slow) response to delaying/cancelling system downtime in the event of bad weather though as with most issues it has taken time to be undertaken.

WPD being the proposer have heavy involvement in the OPR and SECMP122 project that will help to more accurately measure and report on the DCC services as felt by their Users, as well as better incentivising the DCC.

WPD acknowledge there are a lot of device or HAN issues that are outside of the DCC's scope but appreciate that the DCC have started aiding with collating of evidence and interacting with manufacturers and suppliers to try and get these resolved.

WPD also acknowledge the new DNO Programme which is still in its very early days is a welcome and positive step, but need more time to fully understand and potential cost implications and see improvements. We appreciate the DCC work in the Incident process to help with DNO issues, which we have seen some improvement, but continue to iron out the finer details as the service matures.

WPD do not feel that the DCC should be looking to expand the services it offers and feel these additional services are currently not a priority for us until the core service is stable and data is understood and able to be utilised fully.

Kind regards,

Richard Brady
Development Engineer – Smart Meters