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MP281 ‘Install Codes in the SMI’

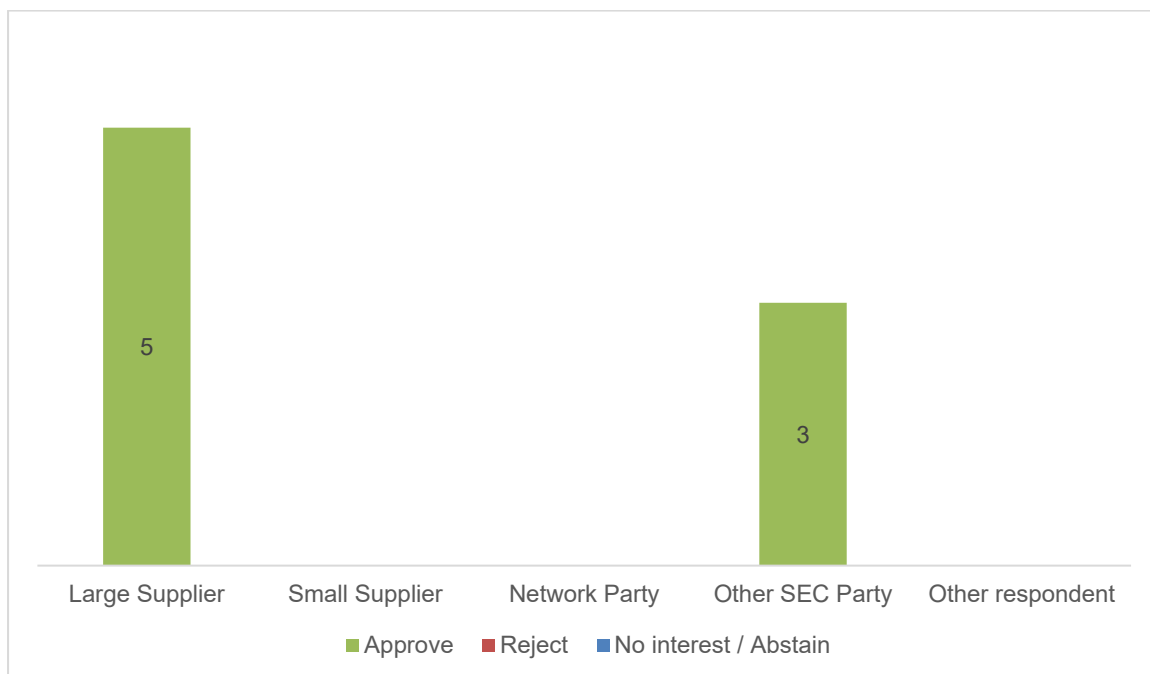
Annex E

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP281 Refinement Consultation.

Summary of responses



Refinement Consultation

The SEC Change Team received eight responses to the Modification Report Consultation. All eight believed that the modification should be approved. They considered the modification better facilitated SEC Objectives....(a)¹, (c)², (d)³, (e)⁴, (f)⁵, and (g)⁶.

¹ facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

⁴ facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.

⁵ ensure the protection of Data and the security of Data and Systems in the operation of this Code.

⁶ facilitate the efficient and transparent administration and implementation of this Code.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	Yes		
Calisen Asset Management Ltd	Other SEC Party	Yes	Calisen consider that this will partially resolve the issues in the short term. However, an enduring solution needs to be implemented (see later comments about splitting the MOD). Furthermore there are a number of outstanding points that need clarification as soon as possible (see Q11).	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	Yes	The solution put forward will allow suppliers to self-serve for install code collection. This will increase the success rate of remotely commissioning non-commissioned meters, reducing the burden on engineer workforce, back-office support and reducing the impact on consumers.	
E.ON Next	Large Supplier	Yes	On both interim and long term	
Northern Powergrid Metering Ltd	Other SEC Party	Yes	We agree the proposed solution would address the issue by making install codes available centrally and removing the dependency on the current email process. We will provide install information where we have access under best endeavours, however, we still strongly believe	

Question 1				
Respondent	Category	Response	Rationale	SEC Change Team Response
			the responsibility for providing install codes should sit with the losing Supplier first, and then with the manufacturer where codes are missing, rather than with MAPs.	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Agree, partially	We agree that the enduring solution planned for DSP2 will resolve the identified issue, and we do perceive the initial solution for a repository to have a benefit that shouldn't detract from progressing. However, we have concerns that it will be dependent on the parties actively participating and providing this information. We are confident that the majority of large Suppliers will do so but until the enduring solution is in place, we are concerned there will still be significant gaps which will prevent us from fully moving away from our existing processes to access Install codes. To be clear, we do not believe this should halt progression of the current solution and approach for enduring in DSP2, simply highlighting the importance of the enduring solution.	
Secure Meters	Other SEC Party	Partially	Solution will resolve supplier access to legacy install codes only.	

Question 2: Do you agree with the proposed implementation approach?

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	Yes	We agree that the FSM approach is more sensible, and much more cost effective, and gives us the ability to deliver ahead of 2029 (DSP2).	
Calisen Asset Management Ltd	Other SEC Party	Yes	Calisen are supportive of the proposal being implemented as soon as possible, once all aspects are clarified.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	Yes	No objection to anything documented in the implementation plan	
E.ON Next	Large Supplier	Yes	We fully support the short term solution but the long term implementation still needs more discussion at the appropriate time	
Northern Powergrid Metering Ltd	Other SEC Party	Yes	We agree with the proposed implementation approach. Moving install codes and certificates into the SMI at the point of installation is a sensible way to remove the manual email process and give gaining Suppliers direct access.	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Yes	It's the most sensible approach, and although noting the above concerns, we do not believe an alternative approach is required.	

Question 2				
Respondent	Category	Response	Rationale	SEC Change Team Response
Secure Meters	Other SEC Party	Partially	FSM needs to be delivered asap but not sure the link to Nov 2026 since assume no other DCC System changes are needed and as such could be a standalone ad-hoc release sooner. There are no details related to implementation for remaining requirements listed.	There are currently no timescales for the automated solution utilising the 'SMI' as this would be fully scoped once the FSM solution has been implemented.

Question 3: Please provide some insight on the average number of Devices with missing install codes that you are gaining on a monthly basis if applicable.

Question 3				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	No	Apologies – we haven't managed to get this information.	
Calisen Asset Management Ltd	Other SEC Party	Yes	Estimate we get around 5k a month of requests for the install codes. These are often in bulk from suppliers.	
EDF	Large Supplier			
Utilta Energy Limited	Large Supplier	Yes	This response has been marked confidential	
E.ON Next	Large Supplier	Yes	~3k per month; dependent upon market activity and DESNZ status of assets	
Northern Powergrid Metering Ltd	Other SEC Party	No		
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Yes	We are requesting c.2k install codes per month for meters we've inherited.2k per month	
Secure Meters	Other SEC Party			

Question 4: Will there be any impact on your organisation to implement MP281?

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	Yes	For the initial FSM solution, we (or MAPs or manufacturers) will need to upload the data, and we (as Supplier) will have the ability to extract it. The 12.2 amendments would require an adaptor upgrade, etc, but this would only be in the later DSP2 phase. The mod report is not clear on the “now” vs “later” requirements. The mod report needs to be updated to reflect what actually will be delivered as part of MP281 now (for Nov 2026).	The FSM solution would deliver requirements 1 and 2. 1. Install Codes for Devices to be uploaded by Suppliers to the Smart Metering Inventory (SMI). 2. Install codes to be made available to Suppliers via the Service Management Portal. Requirements 3, 4, and 5 would be delivered by the additional changes involving adding additional fields to SRV 12.2 to include install codes and Certificates. 3. The DCC Total System shall support Install Codes, Device Certificates, and Certificates used by the Device in the Smart Metering Inventory. 4. Installing Supplier shall provide the install codes via Service Reference Variant (SRV) 12.2

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
				'Device Pre-notification' during pre-notification. 5. Installing Supplier shall provide the Device Certificates & Access Control Broker (ACB) Certificates used by the Device via 12.2 'Device Pre-notification' during pre-notification.
Calisen Asset Management Ltd	Other SEC Party	Yes	Calisen currently manually process requests for install codes from suppliers, therefore in the long term, this will remove the need for that process. However, in the short term, it is anticipated we will be engaged in providing uploads in volume (unless manufacturers undertake) and on an enduring basis until the long term solution is introduced.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	Yes	We will need to make amendments to our existing processes and reporting associated with the current process. This will be a minimal impact vs the benefits of the modification.	
E.ON Next	Large Supplier	Yes	Internal process changes and resources needed to manage the downloads. Potential changes to user access control.	

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
Northern Powergrid Metering Ltd	Other SEC Party	Yes	The main impact for us would be providing install codes as a last resort. At present we don't have access to the SMI, so there would be some initial work required to enable that and support any backfill activity. Beyond that, we don't expect significant operational impact. Question	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Yes	Once the enduring solution will be implemented, then we will need to update policy and processes for the new approach. However, the initial solution won't be too dissimilar to our current approach, just adds an additional step to upload to the FSM	
Secure Meters	Other SEC Party	Maybe	Device manufacturers already supply install codes to customers (supplier/MAPs) as part of a supply of goods process (i.e. within ASN) If suppliers and/or MAPs do the upload, no additional cost to manufacturers If manufacturers are required to upload into FSM then additional cost will be incurred as manufacturers will need to - Arrange connectivity to FSM (will this be UK only?) - Create and document an FSM upload process, along with any unhappy path scenarios. - Identify and train sufficient staff (will staff need to be UK based only?) Manufacturers may already deal with ad-hoc email requests for install codes so update of process would not	

Question 4				
Respondent	Category	Response	Rationale	SEC Change Team Response
			be significant, unless the process needed to be operated from within the UK only.	

Question 5: Will your organisation incur any costs in implementing MP281?

Question 5				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	£1-£49,999	For the initial FSM change (under MP281) there will be some bulk manual uploads. Maybe 0.5 days per month, which would fit within our existing processes. Minimal cost – near the bottom of the £1-49,999 range.	
Calisen Asset Management Ltd	Other SEC Party	£1-£49,999	Limited to cost to implement – if MAPs are required to provide the bulk upload data to the DCC there would be a resource cost of sourcing this data. There would be ongoing cost of continuing to provide the data – though this would be reflected against the resource saving of not having to undertake the current manual process.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	£1-£49,999	Expected implementation costs will be minimal. This will just consist of internal resource effort. The expected cost saving is based on us having an increased percentage of success in gaining an install code and successfully remotely commissioning the devices. This will reduce the current spend on engineer visits and any future potentially GSOP impacts.	
E.ON Next	Large Supplier	£1-£49,999		

Question 5				
Respondent	Category	Response	Rationale	SEC Change Team Response
Northern Powergrid Metering Ltd	Other SEC Party	£0	We expect only limited costs from MP281. The main area would be any one-off effort to provide install codes	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	£50,000-£249,000	Minimal costs to adjust process and policy. However, the enduring solution will impact our Adapter Provider and require tech changes to support the new fields in SRV12.2	
Secure Meters	Other SEC Party	£1-£49,999 £0	Estimated cost are related to initial implementation and ongoing operations so assume this to be an annual cost.	

Question 6: Will there be any benefit to your organisation in implementing MP281?

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	£50,000-£249,000	A central location for install codes will make this much simpler, especially for suppliers who don't have relationships with all of the MAPs or Manufacturers related to their customers' meter portfolio. We would still need to do a home engineer visit, but easier access to install codes would stop us needing to take meters off the wall. We would also save on early removal charges.	
Calisen Asset Management Ltd	Other SEC Party	£0	As per Q4 it is expected, longer term Calisen would make savings once the current manual process is no longer needed.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	£50,000-£249,000	As per the answer provided in question 5.	
E.ON Next	Large Supplier		Assuming this should be a cost saving and not 'expected implementation costs' then; makes our process more efficient and mitigates issues impacting end-to-end journey. Will also mitigate GSOP 4 financial costs. But without accurate data this is difficult to put a figure on	

Question 6				
Respondent	Category	Response	Rationale	SEC Change Team Response
Northern Powergrid Metering Ltd	Other SEC Party	£0	Once install codes are held centrally in the SMI, we would no longer need to respond to repeated email requests for codes, which currently takes up resource despite this being the losing Supplier's responsibility.	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	£500,000 or more	This will significantly reduce the risk of removing working SMETS2 meters where we are simply missing the Install Code and incurring Premature Replacement Charges (PRC). It will also reduce the manual effort and time that it currently takes to contact, access and upload install codes which come in several different formats and sources.	
Secure Meters	Other SEC Party			

Question 7: How long from the point of approval would your organisation need to implement MP281?

Question 7				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier		We could start using it immediately, once the database became available.	
Calisen Asset Management Ltd	Other SEC Party		Less than a month, subject to onboarding to FSM. If it is decided that MAPs will provide the bulk volume of data initially, we would need time to prepare this. Resource that undertake the existing manual process, could be used to complete the regular submission of data. Calisen are currently trying to onboard and gain access to FSM – once this is completed, we would be able to provide data. However, other MAPs and manufacturers would have to undertake this process and DCC would need to be able to support this onboarding to ensure all parties were able to complete the necessary steps (acknowledging some parties have struggled to onboard during the current process).	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier		Expected internal implementation time would be 4-6 weeks. This would allow the business to make amendments to existing reporting, processes and complete the required staff training.	

Question 7				
Respondent	Category	Response	Rationale	SEC Change Team Response
E.ON Next	Large Supplier		Dependent upon DCC/DSP security processes, not long. Should be able to be implemented within weeks.	
Northern Powergrid Metering Ltd	Other SEC Party			
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Minimal	For the initial solution, it won't require significant effort to upload Install Codes to FSM. The biggest impact will be if there is a requirement to adjust file formats for FSM upload. For the enduring solution, we will need to scope the cost/effort with our Adapter Provider to make changes to SRV12.2. The Install Code field should be a relatively minor change in time/cost and would be possible to support from DSP2 go live. However, the certificate field poses a bigger challenge and it's unclear to the extent of the cost/time that would be required to support this.	
Secure Meters	Other SEC Party	1-9 months	Pure guess as no idea how long it will take to setup connectivity to FSM and train someone to use it.	Connectivity will follow exactly the same rules as the rest of the DCC Total System.

Question 8: Do you believe that MP281 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
British Gas	Large Supplier	Yes	(a), (g)	General SEC Objectives (a) and (g).
Calisen Asset Management Ltd	Other SEC Party		(a), (c), (f)	We consider that the implementation of this MOD will help the overall smart meter programme by providing a solution which means smart meters can be installed and operated appropriately and can reduce the need for unnecessary removal of meters when change of supplier happens. We also consider this helps improve the health of the smart metering estate, as it allows supplier to fully communicate with installed meters and ensure they are optimally commissioned and operational – thus providing the expected benefits to consumers, suppliers and networks.
EDF	Large Supplier			Please see comments in Q11
Utilta Energy Limited	Large Supplier	Yes	(a), (c)	This MOD fully covers objective a & c within the SEC. This is a benefit to consumers and allows supplier parties to provide consumers with the full Smart experience.
E.ON Next	Large Supplier	Yes	(a), (c), (e), (f), (g)	
Northern Powergrid Metering Ltd	Other SEC Party		(a), (d)	Centralising install codes in the SMI will support the more efficient installation and commissioning of smart metering systems.
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Objectives a and c	(a), (c)	We believe this will better facilitate SEC objectives a) and c) as it will ensure Smart Meters can be commissioned remotely and/or not removed unnecessarily whilst allowing Consumers' access to their data for the management of their electricity and gas usage.

Question 8				
Respondent	Category	Response	SEC Objective(s)	Rationale
Secure Meters	Other SEC Party		(a)	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP281 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	No	Indirect only. We might still need to visit the customer home, but it would result in quicker on-site time.	
Calisen Asset Management Ltd	Other SEC Party	Yes	As per Q8, consumers will benefit from the implementation of this MOD as this will fix a gap in the current smart system, by providing the install codes to all relevant parties in a timely manner. This will allow interaction with the meter, particularly in a change of supply scenario. Reducing the need for premature meter removal, will save suppliers and consumers from unnecessary costs.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	Yes	The benefit to consumers will ensure that there is an increased chance that they will have a fully working Smart Meter System, without the need to have their supplier attend their property and change the existing devices.	
E.ON Next	Large Supplier	Yes	Fix metering issues faster and more sustainably	
Northern Powergrid Metering Ltd	Other SEC Party	Yes	By ensuring install codes are available in the SMI, gaining Suppliers will be able to commission meters more reliably,	

Question 9				
Respondent	Category	Response	Rationale	SEC Change Team Response
			reducing delays and helping ensure consumers end up with a fully functioning smart meter.	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Yes	It will benefit consumers by being able to resolve smart meter issues quicker and easier by reducing unnecessary site visits and replacements.	
Secure Meters	Other SEC Party			

Question 10: Noting the costs and benefits of this modification, do you believe MP281 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SEC Change Team Response
British Gas	Large Supplier	Yes		
Calisen Asset Management Ltd	Other SEC Party	Yes	For all of the reasons previously stated. This needs to be implemented as soon as possible – as reflected in Q11, it may be beneficial to split this MOD into two parts to aid efficiency in implementation.	
EDF	Large Supplier		Please see comments in Q11	
Utilta Energy Limited	Large Supplier	Yes	We fully endorse this MOD due to the benefits that it provides across the board.	
E.ON Next	Large Supplier	Yes		
Northern Powergrid Metering Ltd	Other SEC Party	Yes	MP281 should be approved. Centralising install codes in the SMI will remove the inefficient email process, reduce delays in commissioning.	
Octopus Energy Ltd Bulb Energy Ltd	Large Supplier	Yes	We think the benefit of this modification outweighs the costs and impacts to implement and we believe the business case is strong given the number of meters we've been inheriting that haven't been commissioned.	
Secure Meters	Other SEC Party	Yes		

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
British Gas	Large Supplier	The mod report needs to catch up with the Impact Assessment, and make it clear which bit of the solution is being delivered as part of MP281.	
Calisen Asset Management Ltd	Other SEC Party	Calisen suggest that this Modification should be split – potentially into Part A and Part B – as has been discussed at a number of working groups. Part A should cover this initial bulk upload and the process after which will be needed to continually update the database. Part B should then be designed into the new DSP – the enduring process and the certificate aspect. If not, there is a risk either the second part will not get actioned and/or the MOD can never be closed. The MOD report does not investigate how/who will be providing the data to the DCC – is this going to be MAPs or manufacturers. And the requirements on whichever party to gain access to FSM (which will take some time). Furthermore, there is not yet confirmation of where the data will be held in FSM and who will have access – this is critical to the acceptance of the MOD for some parties, including Calisen as we need to ensure access to data is restricted. We would expect this information to have been included at this stage and suggest it needs to be resolved as soon as possible. Calisen are keen to ensure that only the install code and GUID are stored and available to all parties. Adding any other data about the meter, may provide insight which we not want competitive organisations to have access to – and should not be needed as part of the delivery of this MOD or achieving the respective	The approach is to fully implement the FSM solution in the first instance to understand if there are any gaps that need to be considered for inclusion in an automated SMI solution utilising SRV 12.2 ‘Device Pre-notification’ as well as reviewing existing requirements. MP281 is not proposing any new obligations there will be no requirement for any parties to upload install codes to the FSM Database. Rules Based Access controls will enable Suppliers, MAPs, and Manufacturers to access and upload install codes. In Sub-Committee discussions there has been acknowledgement that there is a large quantity of install codes held by these parties and in addition a willingness to provide them to a Database, uptake is anticipated to be high to avoid

Question 11			
Respondent	Category	Comments	SEC Change Team Response
		objectives. This needs to be confirmed as soon as possible as part of the development of this MOD. Furthermore, we would expect only authorised parties to have access to the database in the FSM. We are supportive of the development of the MOD if these aspects are included. The Business Requirements suggests that the install codes will be uploaded into SMI by Suppliers – should this be revised to reflect the amended process – which will be MAPs or Manufacturers uploading? Furthermore BR 4 + 5 – Calisen believe there are circumstances where the MAP or another third party may be completing the pre-notification process, so this may need to be updated to reflect what actually happens.	the unnecessary removal of working Devices. Install codes and GUIDS will be securely stored in the FSM Database and details will be included in the DCC full impact assessment.
EDF	Large Supplier	We are broadly supportive of the proposed Modification and recognise the intent to address the identified issues around non-commissioned devices and installer visibility. The proposed solution appears directionally sensible and aligned with improving commissioning outcomes, data availability, and operational resilience where supplier changes occur. However, before providing full endorsement, we would welcome further clarity in several key areas. Firstly, a clearer view of the anticipated cost impact is required. This should include both initial implementation costs and any ongoing operational or system support costs, along with an indication of how these would be apportioned across parties. Understanding the scale of investment and value for money is important to ensure proportionality relative to the issue being addressed. Secondly, we would welcome further detail on how the solution would be tested prior to live deployment. This should include confirmation of the testing approach across, DCC and relevant market	Full details on costs, testing, and controls will be included in the DCC full impact assessment.

Question 11			
Respondent	Category	Comments	SEC Change Team Response
		participants, the scope of test scenarios, and how success criteria will be defined and evidenced. In particular, assurance is needed that the solution will function reliably at scale and under high volume conditions. Thirdly, clarity is needed on quality assurance and ongoing controls. This should cover how the accuracy and integrity of uploaded install codes and associated certificates will be validated, how exceptions or errors will be identified and managed, and what audit or monitoring arrangements will be in place postimplementation to ensure continued compliance. In addition, it would be helpful to understand the proposed implementation timeline, any key dependencies or risks, and whether there are transitional arrangements for existing devices and data. Consideration of operational impacts on suppliers and field forces, including any changes to processes or training requirements, would also be beneficial. Subject to satisfactory clarity on the above points, we are supportive of the Modification progressing and look forward to further engagement as the proposal is refined.	
E.ON Next	Large Supplier	This is a much-needed modification and everything possible must be done to mitigate delays. We don't consider this to be low priority and would argue this is critical, not just for us, but for the industry (and customers) as a whole.	
Secure Meters	Other SEC Party	Recommend MP281 is split into 2 parts 1. Initial FSM partial solution 2. Enduring DSP2 full solution	

Question 11			
Respondent	Category	Comments	SEC Change Team Response