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Smart Energy Code

MP243

‘CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date’

Modification Report

Version 0.4

12 September 2023

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the responses to the Refinement Consultation.

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1. Summary

This proposal has been raised by David Rollason on behalf of the Data Communications Company (DCC).

The DCC is aware of approximately 2.2 million uninstalled Communications Hubs which are compliant with the Communications Hub Technical Specifications (CHTS) v1.1 and the Great Britain Companion Specification (GBCS) v2.1. The Technical Specification Applicability Tables (TSAT) contain an Installation End Date of 30 April 2024 and a Maintenance End Date of 31 May 2024. These provide the final date that these Communications Hubs can be installed and will be maintained. Any stock remaining after this time will not be compliant and should be scrapped or returned, incurring a financial and environmental cost.

The Proposed Solution is to extend the CHTS v1.1 and GBCS v2.1 Installation End Date by 24 months. This would change the date from 30 April 2024 to 30 April 2026.

This modification impacts Suppliers, Meter Installers, Other SEC Parties and the DCC. Costs are limited to the Smart Energy Code Administrator and Secretariat (SECAS) time and effort. SECAS is targeting this modification for the February 2024 SEC Release. This is a Self-Governance modification.

2. Issue

What are the current arrangements?

SEC Schedule 11 'Technical Specification Applicability Tables' contains a table titled 'CHTS and Relevant Versions of GBCS'. The table includes different CHTS Versions, the corresponding GBCS Version as well as the relevant Installation and Maintenance Validity Periods. For CHTS v1.1 and GBCS v2.1 the Installation End Date is 30 April 2023, with the Maintenance End Date on 31 May 2024.

The DCC is aware of approximately 2.2 million uninstalled Communications Hubs which are compliant with the CHTS v1.1 and GBCS v2.1 specifications. Should installation and production rates stay at the same level until the end of the existing Installation and Maintenance End Dates, the DCC estimates that there could still be 2.2 million Communications Hubs that have been produced but remain uninstalled by the end of the existing End Dates. This is because supply and installation rates are roughly equivalent.

What is the issue?

An issue in GBCS v3.2 specification has led to Communications Hubs continuing to be manufactured to be compliant with GBCS v2.1 for an additional two years more than anticipated. The volume of Communications Hub stock has grown to an extent that stock volumes will not be used before the end of the existing TSAT dates. Any stock remaining after this time will not be compliant and should be scrapped or returned, incurring a financial and environmental cost.

In the coming years 2G and 3G Communications Hubs are being phased out, to be replaced by 4G Communications Hubs. It is anticipated that the rollout of 4G Communications Hubs will be slow in order to minimise risk. If issues are found with 4G Communications Hubs then Parties may wish to

default to installing 2G/3G Hubs. As such, extending the Installation End Date will allow Parties to fall back on the remaining stock, should they experience issues with 4G Hubs.

What is the impact this is having?

If the dates pass, any remaining uninstalled stock will be non-compliant with the SEC should be scrapped or returned. The DCC notes that the existing returns process will not be able to support the volume of Communications Hubs which on these specifications.

If Parties continued to install these Communications Hubs following the end of the Installation Validity Period (IVP), the installation would be non-SEC compliant. The DCC would not be under an obligation to support the maintenance and upgrade of the firmware on the Device.

Impact on consumers

Scrapping this remaining stock could result in fewer Energy Consumers gaining the access to smart meters in the immediate future.

3. Solution

Proposed Solution

The Proposed Solution is to extend the Installation End Date for CHTS v1.1 and GBCS v2.1 by 24 months. This would change the date from 30 April 2024 to 30 April 2026.

The changes to the SEC to meet this solution are available in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers	✓	Meter Installers
	Device Manufacturers		Flexibility Providers

All affected Parties would benefit from this change as they would be able to continue to install Communication Hubs which should otherwise be scrapped or returned to the DCC.

During the Refinement Consultation one Party noted that they would experience a small impact if this modification was implemented. They noted that they would need to carry out some back-office actions in order to allow them to prioritise the installation of CHTS v1.1 and GBCS v2.1 Devices. They noted this action would take around two weeks to complete.

DCC System

There will be no impacts to DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 11 'Technical Specification Applicability Tables' (TSAT)

Technical specification versions

There are no changes directly to the Technical Specifications, only to the Installation and Maintenance End Dates in the TSAT.

Devices

Devices impacted			
	Electricity Smart Metering Equipment		Gas Smart Metering Equipment
✓	Communications Hubs		Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices
	Standalone Auxiliary Proportional Controllers		Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

This change will allow Communications Hubs compliant with CHTS v1.1 and GBCS v2.1 to continue to be installed by the Supplier and upgraded by the DCC. There will be no impact to Device behaviour.

Consumers

This change will result in more energy consumers gaining the access to smart meters in the immediate future.

Other industry Codes

There will be no impact on other industry Codes.

Greenhouse gas emissions

There will be no impact on greenhouse gas emissions.

5. Costs

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

During the Refinement Consultation all respondents noted there would be no costs resulting from this modification. Several respondents noted that this modification would be a cost saving as they would not need to scrap Devices unnecessarily.

During the July 2023 TABASC meeting, one member noted that this modification could lead to an increase in costs for Suppliers due to increased site visits. They noted that many Suppliers will not have processes to distinguish between different versions of Communications Hub. In the event that an expired Communications Hub is installed and the DCC is unable to upgrade the firmware then the Supplier would need to replace the Device. Further detail about this is available in the 'Discussion Points' section of this report.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **29 February 2024** (February 2024 SEC Release) if a decision to approve is received on or before 15 February 2024.

- **Ad-hoc SEC Release** if a decision to approve is received after 16 February 2024.

SECAS anticipates that this modification will be approved in time for the February 2024 SEC Release. However, if this is not possible, this modification must be implemented as an ad-hoc SEC Release as soon as possible after the February 2024 SEC Release. This is because the Installation End Date is currently 30 April 2024. Therefore, the modification needs to reach a decision prior to this date. If this modification misses the February 2024 SEC Release it will be implemented as an ad-hoc SEC Release one week following decision.

7. Assessment of the proposal

Observations on the issue

Previous extensions to TSAT

The TSAT contains IVP (from Installation Start Date to Installation End Date) and Maintenance Validity Period (MVP – from Maintenance Start Date to Maintenance End Date). These dates are to ensure Devices compliant with older versions of technical specifications are either updated or replaced as they age. Due to several factors, including slower than expected uptake of smart metering, delayed roll out of newer Communications Hub Releases, and UK Government distancing restrictions in 2020/21, installations have not been as high as anticipated. Older versions of Communications Hubs bought by Suppliers have been stored while the stock is installed.

There have been four previous modifications to extend IVP and MVP dates:

- [MP139 'MVP and IVP dates for CHTS'](#) extended CHTS v1.0 and GBCS v1.0 & v1.1 IVP end dates from 31 January 2021 for 12 months. It also extended CHTS v1.1 / GBCS v2.1 IVP end dates from 28 February 2021 for 12 months and extended MVP end dates for CHTS v1.1 / GBCS v2.1 from 31 May 2021 for 12 months.
- [MP191 'Extending CHTS v1.0 & v1.1 IVP and MVP end dates'](#) extended the CHTS v1.0 IVP and MVP end dates from 31 January 2022 and 28 February 2022 respectively by 12 months.
- [MP201 'CHTS v1.1 and GBCS v2.0 Applicability End Date'](#) extended the CHTS v1.1 and GBCS v2.0 from 28 February 2022 by 18 months.
- [MP221 CHTS v1.0 and GBCS V1.1 Installation End Date and Maintenance End Date'](#) extended the CHTS v1.0 and GBCS v1.1 Installation End Date by three months to 30 April 2023 and the Maintenance End Date by three months to 30 May 2023.

Amendment to the original Proposed Solution

At the start of the Refinement Process the Proposer suggested that both the Installation End Date and Maintenance End Date should be extended. However, following feedback from the Sub-Committee Chairs, the Proposer has elected to extend only the Installation End Date from 30 April 2024 to 30 April 2026.

This is because of feedback received from the Technical and Business Architecture Sub-Committee (TABASC) that extending both Installation and Maintenance End Dates could lead to Devices not being upgraded to the latest version of firmware for the duration of the Maintenance Validity Period.

They suggested that extending only the Installation End Date would mean that Suppliers could continue to install Communications Hubs and would mean that the DCC would need to bring the Communications Hubs into compliance with the latest version of firmware under all reasonable steps.

Sub-Committee input

SECAS has engaged with the OPSG, TABASC and SSC to input into the modification report. SECAS asked the following questions at the relevant sub-committees and the feedback has been collated in the 'Discussion points' section of this paper.

Sub-Committee input	
Sub-Committee	Input received
OPSG	- Do you agree that the 24-month extension to both the Installation End Date and Maintenance End Date which the Proposer has suggested is suitable? - Should only the Installation End Date be extended? - What are the operational impacts of extending the existing End Dates?
SMKI PMA	No input sought.
SSC	- Do you agree that the 24-month extension to both the Installation End Date and Maintenance End Date which the Proposer has suggested is suitable? - Should only the Installation End Date be extended? - Do you have any security concerns about extending the Installation and Maintenance End Dates?
TABASC	- Do you agree that the 24-month extension to both the Installation End Date and Maintenance End Date which the Proposer has suggested is suitable? - Should only the Installation End Date be extended? - Should the purpose of the TSAT be reviewed to ensure it is driving desired behaviour?

Solution development and Discussion points

Extension of Installation Validity Period only

TABASC Statement

SECAS presented this modification to the TABASC in July 2023, with the Proposed Solution being to extend both the Installation End Date and the Maintenance End Date. Following discussions between TABASC members and the Chair, the TABASC produced this statement to feed into the Modification Report as an official position on this modification.

"This modification draws attention to the volume of CHTS v1.1/GBCS v2.1 Communications Hub awaiting installation, and the likelihood of them not being used before the end of the existing TSAT dates. Any stock remaining after this time will not be compliant and therefore could be scrapped or returned, incurring a financial and environmental cost. The proposed solution is to therefore extend

the Installation Validity Period (IVP) and Maintenance Validity Period (MVP) dates by 24 months to allow time for them to be installed.

TABASC recognise that preventing Devices from being installed is not preferred and therefore there is support for the change to the TSAT to allow installation of the old Devices, however there is concern that those Devices should be upgraded as soon as possible.

The SEC sets out the Smart Metering Technical Specifications, including the CHTS and the GBCS. SEC Schedule 11 'Technical Specification Applicability Tables' specifies the dates in which Devices built to specifications can be installed (the IVP) and maintained (the MVP). One of the key objectives of the TSAT tables is to progress the Device estate towards the latest versions of firmware thereby simplifying the range of variants in operation.

The IVP is the window where Devices complying with that version of the specifications can be installed. The MVP is the window where Devices complying with that version of the specifications can be maintained.

Traditionally the IVP has been given an end date prior to the MVP end date to allow time for Devices to be upgraded after installation. TABASC has considered the implications of the SEC Modification extending the end dates by 24 months and considers it could allow unhelpful behaviour in Devices not being upgraded for the MVP period. The proposal from TABASC is to not extend the MVP end date from May 2024, and only extend the IVP by 24 Months. The implication of this is that it remains acceptable for Suppliers to install Comms Hubs that once installed would have an expired MVP, after installation DCC will, under all reasonable steps, carry out firmware upgrades to bring the Comms Hubs into compliance”.

TABASC produced this statement in July 2023. SECAS then presented this modification to the Security Sub-Committee (SSC) and Operations Group (OPSG), with the TABASC statement included. Both the SSC and OPSG Chairs agreed with the statement that only the Installation End Date should be extended.

Potential increased site visits for Suppliers

During the July 2023 TABASC meeting, Supplier members noted that there could be an increase in site visits if only the Installation End Date was extended. They noted that currently Meter Installers who work on behalf of Suppliers can choose any Communications Hubs to install. As such, they will likely have large quantities of Communications Hubs in warehouses which are mixed, with no existing process to easily separate them. The member noted that this modification would mean that Meter Installers would need to have processes in place to distinguish between each Communications Hub before they install them. They added Suppliers are unlikely to have such filtering processes in place currently and therefore their Installers may install outdated versions of Communications Hubs in error.

Should this occur and the Communications Hub is in the 2% of Devices which the DCC was unable to update the firmware via an Over-the-Air (OTA) firmware upgrade, the DCC would then notify the Supplier that they would need to attend the site and replace the Communications Hub. In turn, would lead to increased costs for Suppliers.

Length of End Date extension

In all Sub-Committee meetings, members noted that there have been several previous modifications to extend the CHTS v1.1 and GBCS v2.1 Installation and Maintenance End Date. They referenced the previous modifications there have been to extend the End Dates and asked whether the extension

should be made even longer so further modifications are not needed each time the End Date is about to expire. SECAS noted that the DCC has made these calculations based on the rates of installations against the rate that Communications Hubs are being produced to these specifications. These calculations had led them to believe that a 24-month extension would be suitable to ensure all Communications Hubs produced to these specifications could be installed.

Potential amendment to Section A3.33

During initial discussions on this modification, it was suggested that TSAT extensions could be managed via alternate governance, as opposed SEC Modifications. They added that rather than updating the TSAT tables via a SEC modification each time they deem the Installation End Dates and Maintenance End Dates, the decision could rest with an appropriate Sub-Committee.

Liability to update with Suppliers or Manufacturers?

In the July 2023 OPSG meeting, one member challenged the suggestion of only extending the Installation End Date as they were uncertain whether the liability to upgrade patches and firmware would rest with the Supplier or the Manufacturer. The TABASC representative was present at the meeting and noted that the DCC would be responsible for all firmware upgrades to Communications Hubs which had already past the Maintenance End Date. They noted that under all reasonable steps, the DCC must bring ensure that the Device is upgraded to the latest version of firmware, as it cannot be maintained at an earlier version.

Devices marked as 'Withdrawn'

During the OPSG meeting members questioned whether not extending the Maintenance End Date would impact the DCC User Interface Specification (DUIS) version or the corresponding entries on the Smart Metering Inventory (SMI) or Central Products List (CPL). Members noted that they would like clarification that entries in each of these documents would not be marked as withdrawn or removed if the Device was outside of the corresponding Maintenance Validity Period. Members also sought assurance that the only impact of this modification would be the requirement on the DCC to upgrade to a valid version as soon as possible.

SECAS confirms that existing entries will not be marked as withdrawn or removed from the CPL or SMI once the Maintenance End Date has passed. In addition, it would be up to the DCC to upgrade the Communications Hub to the most recent valid version to bring the Comms Hubs into compliance.

8. Case for change

Business case

In favour of approval of MP219

During the Refinement Consultation, SECAS received six responses all of which supported the approval of MP243. The Parties were all Large Suppliers.

They noted that by extending the Installation End Date this would have positive environmental consequences as Parties would have longer to install Communications Hubs on these specifications, meaning less Devices would need to be unnecessarily scrapped. Consequently, this means that costs are not passed onto Consumers.

Parties also noted that if there are any problems with the rollout of 4G Communications Hubs, it would be useful for them to have a large pool of Communications Hubs aligned to these specifications to install.

Parties also mentioned that this is a text-only change to the SEC, therefore the costs of implementing this modification are low. They noted that the low costs and potential for large environmental savings meant the modification should be approved.

Against approval of MP219

SECAS has received no responses against the approval of this modification.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification better facilitates SEC objective (a)¹ as it would prevent large numbers of Communications Hubs from expiring and unnecessarily being scrapped.

Industry views

Feedback from the Refinement Consultation and Working Group meeting showed support for this modification with Parties noting it better facilitates SEC Objective (a).

Views against the consumer areas

Improved safety and reliability

This modification has a neutral impact on safety and reliability.

Lower bills than would otherwise be the case

This modification has a positive impact on lower bills. Without scrapping large numbers of Communications Hubs which do not have a valid Installation End Date, less costs will be passed to Consumers.

Reduced environmental damage

This modification has a positive impact on reducing environmental damage as it reduces the number of Communications Hubs which have been scrapped because of their Validity Periods ending.

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

Improved quality of service

This modification has a neutral impact on improved quality of service.

Benefits for society as a whole

This modification has a neutral impact on benefits for society as a whole.

9. Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	13 Jun 2023
CSC converts Draft Proposal to Modification Proposal	20 Jun 2023
Modification discussed with Working Group	5 Jul 2023
Modification discussed with TABASC	6 Jul 2023
Modification discussed with SSC	12 Jul 2023
Modification discussed with OPSG	24 Jul 2023
Refinement Consultation	9 Aug 2023 – 31 Aug 2023
Modification Report approved by CSC	19 Sep 23
Modification Report Consultation	20 Sep 2023 – 11 Oct 2023
Change Board Vote	25 Oct 2023

Italics denote planned events that could be subject to change

10. Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CHTS	Communications Hub Technical Specifications
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DUIS	DCC User Interface Specification
GBCS	Great Britain Companion Specification
IVP	Installation Validity Period
MVP	Maintenance Validity Period

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Glossary	
Acronym	Full term
OTA	Over-the-air
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMI	Smart Metering Inventory
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specification Applicability Tables

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MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'

Annex A

Legal text – version 0.2

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Schedule 11 ‘Technical Specification Applicability Tables’

These changes have been redlined against Schedule 11 version 20.0.

Amend as follows:

CHTS and Relevant Versions of GBCS

CHTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.0	30/09/16	30/04/23	30/09/16	31/05/23	1.1	06/11/17	Not determined
1.1	28/10/18	Not determined	28/10/18	Not determined	2.0	28/10/18	28/08/23
1.1	28/10/18	30/04/264	28/10/18	31/05/24	2.1	28/10/18	Not determined
1.3	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined
1.3	03/11/22	Not determined	03/11/22	Not determined	3.3	03/11/22	Not determined
1.4	29/11/20	Not determined	29/11/20	Not determined	4.0	29/11/20	Not determined
1.5	04/11/21	Not determined	04/11/21	Not determined	4.1	04/11/21	Not determined
1.6	03/11/22	Not determined	03/11/22	Not determined	4.2	03/11/22	Not determined

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MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'

Annex B

Refinement Consultation responses

About this document

This document contains the full collated responses received to the [MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'](#) Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	Whilst we are concerned at the overall timelines associated with switching from one version to another, given that this transition coming so close to the switch to 4G comms hubs would result in increased industry cost and potential aborted installations, this seems a prudent move.
EDF	Large Supplier	Yes	The industry has yet to move over to GBCS v3.2 meaning there are large amounts of GBCS v2.1 stock held by EDF and other suppliers. Furthermore, manufacturing of GBCS v.21 continues. Based on these facts, EDF agrees that there is no possibility of being able to use this stock before the current end date, and that an extension to the install date is appropriate, and effectively resolves the issue.
EON	Large Supplier	Yes	It will permit the installation of a very large number of comms hubs that would otherwise need to be scrapped.
Octopus Energy Ltd	Large Supplier	Yes	It will provide reasonable period of time to transition to GBCS4.1 hubs, as long as there are no slippages to the GBCS4.1 delivery.
OVO	Large Supplier	Yes	Yes, the solution put forward will resolve the issue, providing that there are no major issues with the 4G rollout that could force suppliers to maintain old stock on v2.1.
Utilita Energy Ltd	Large Supplier	Yes	We agree that extending IVP and MVP end dates will avoid unnecessary scrappage of viable assets.

Question 2: Do you agree that the legal text will deliver MP243?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	The maintenance end date needs to move in parallel surely?	The proposed solution to this modification is to only extend the Installation End Date. The rationale behind this is that not extending the Maintenance End Date means that the DCC, under all reasonable steps, must upgrade the Communications Hub to the latest version of firmware.
EDF	Large Supplier	Yes	The proposed new date in the CHTS table matches the proposed extension.	
EON	Large Supplier	Yes	The legal text correctly extends the IVP end date but not the MVP end date.	
Octopus Energy Ltd	Large Supplier	Yes	Although I know this was discussed, I am still not sure the Maintenance End Date remaining as 31/05/2024 (an earlier date than the Installation End Date) works. It means that devices could be installed between 31/05/2024 and 30/04/2026 (the proposed Installation End Date) which I am not sure the implications are. Will CH devices operating on GBCS2.1 installed between 31/05/2024 and 30/04/2026 be targeted for Firmware Upgrade by the CSP? Will it prevent Incidents being raised against them?	

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			I am not sure the Maintenance Validity Period in the SEC is clear in its definition as to what the Operational Implications of this end date is for CHs.	
OVO	Large Supplier	Yes	Yes, according to the 'MP243 Legal Text v0.2' file, although it could be better written in text what the proposed plan is.	
Utilita Energy Ltd	Large Supplier	Yes	No comments.	

Question 3: Do you agree with the proposed implementation approach?

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This is a continuation of changes made previously but we have a level of concern that the stock of hubs is being managed appropriately in the run up to 4G transition in order to minimise the costs associated with old stock. The repeated changes to this date reinforce this concern.
EDF	Large Supplier	Yes	Straightforward change. 2 months to implementation seems reasonable, and alternative plans in place should a decision be made later than expected.
EON	Large Supplier	Yes	Avoids financial and environmental cost.
Octopus Energy Ltd	Large Supplier	Yes	
OVO	Large Supplier	Yes	Yes, as the postponement (by 2 years) of the Installation End Date should provide suppliers adequate time to install the affected devices.
Utilita Energy Ltd	Large Supplier	Yes	The implementation approach outlined makes sense based on the installation end date being amended.

Question 4: Will there be any impact on your organisation to implement MP243?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	Given this is continuing the status quo this is operationally the least worst option.
EDF	Large Supplier	No	No changes required.
EON	Large Supplier	No	There are no impacts.
Octopus Energy Ltd	Large Supplier	No	Only a positive impact by having additional time to install GBCS2.1 Devices.
OVO	Large Supplier	Yes	There will be a small impact as some back-office actions will need to be carried out to allow us to prioritise the installation of v1.1 devices, followed by v2.1 devices.
Utilita Energy Ltd	Large Supplier	Yes	This change would allow us to continue to install our existing inventory of such devices.

Question 5: Will your organisation incur any costs in implementing MP243?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No costs	This modification continues the current position
EDF	Large Supplier	No costs	No costs to implement
EON	Large Supplier	No costs	There are no costs
Octopus Energy Ltd	Large Supplier	No	
OVO	Large Supplier	No costs	We do not expect to incur any extra costs by implementing MP243. To the contrary, the extension will allow us to install a significant amount of stock that we would otherwise have had to scrap.
Utilita Energy Ltd	Large Supplier	No costs	No costs associated with this implementation. This would be a cost saving as we would no longer be forced to return or scrap remaining inventory of these devices.

Question 6: How long from the point of approval would your organisation need to implement MP243?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	There is no change to implement on our side.
EDF	Large Supplier	0	No changes required.
EON	Large Supplier	No time required	This is a SEC change that simply allows installation of comms hubs in stock.
Octopus Energy Ltd	Large Supplier	None	No time required to support this modification
OVO	Large Supplier	2 weeks	We estimate it would take us circa two weeks to implement the necessary back-office actions that would allow us to prioritise the installation of v1.1 devices.
Utilita Energy Ltd	Large Supplier	None	No changes to existing business processes required.

Question 7: Do you believe that MP243 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This mod supports SEC objective A in the short term but note the general risk of increased stock of present generation of hubs that will need to be carefully managed over the proposed extension period.
EDF	Large Supplier	Yes	MP243 minimises waste and allows the Smart rollout to continue efficiently.
EON	Large Supplier	Yes	
Octopus Energy Ltd	Large Supplier	Yes	It would prevent a large volume of CHs being wasted which would incur cost and be environmentally wasteful
OVO	Large Supplier	Yes	SEC Objective A
Utilita Energy Ltd	Large Supplier	Yes	We believe that this modification would better facilitate General SEC Objective (a) by avoiding the unnecessary disposal of viable assets. It also minimises the environmental impacts of doing the same.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP243 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	-
EDF	Large Supplier	No	No impact. Impacted if not implemented.
EON	Large Supplier	Yes	The aforementioned potential costs of scrappage do not need to be passed onto customers, and the environmental impacts.
Octopus Energy Ltd	Large Supplier	Not applicable	I don't think it will affect consumers negatively or positively.
OVO	Large Supplier	Yes	We believe there would be financial and operational benefits to the consumer, either directly or indirectly, as the implementation of MP243 would allow us to continue to install existing stock (without the need to scrap a significant portion of it) and also could allow the mitigation of unforeseen issues that might arise from the 4G rollout.
Utilita Energy Ltd	Large Supplier	Yes	Avoiding wasting millions of assets avoids passing through unnecessary charges to consumers.

Question 9: Noting the costs and benefits of this modification, do you believe MP243 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This mod avoids the potential costs of recovering current generation comms hubs so on balance is beneficial.
EDF	Large Supplier	Yes	Small cost to industry, no additional cost to implement for EDF. Avoids a large amount of waste, and prevents impact to Smart rollout.
EON	Large Supplier	Yes	Common sense
Octopus Energy Ltd	Large Supplier	Yes	It will reduce industry wide costs by enabling additional time to install Devices given the delays to GBCS 4.1 CHs (the next manufacturing version).
OVO	Large Supplier	Yes	We believe MP243 should be approved as it would allow us to continue to install, and deplete, v1.1 devices which make up the lion's share of our stock-holding.
Utilita Energy Ltd	Large Supplier	Yes	The benefits from this modification outweigh negatives, therefore we believe it should be approved and implemented.

Question 10: Please provide any further comments you may have.

Question 10		
Respondent	Category	Comments
British Gas	Large Supplier	Given all of the assets that are connected to the DCC are on later versions of GBCS, this mod should make it clear if there are any technical limitations at first install due to operating a GBCS 2.1 hub with a meter/display on a later version and the likely timescale for the hub to be upgraded, which is managed by the DCC.
EDF	Large Supplier	No
EON	Large Supplier	No further comments.
Octopus Energy Ltd	Large Supplier	-
OVO	Large Supplier	-
Utilita Energy Ltd	Large Supplier	No further comments.