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DP262

‘Extending the Installation End Date for CHTS v1.0 and GBCS v1.1’

Modification Report

Version 0.1

9 January 2024

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Paul Bedford from Drax.

The Proposer is aware of approximately 120,000 uninstalled Communications Hubs which are compliant with the Communications Hub Technical Specifications (CHTS) v1.0 and the Great Britain Companion Specification (GBCS) v1.1. The Technical Specification Applicability Tables (TSAT) contain an Installation End Date of 30 April 2023 and a Maintenance End Date of 31 May 2023 for these Communications Hubs. 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 will need to be scrapped or returned, incurring a financial and environmental cost.

The aim of this modification is to extend the dates to allow Suppliers to install the Devices.

2. Issue

What are the current arrangements?

Smart Energy Code (SEC) Schedule 11 'Technical Specification Applicability Tables' contains a table titled 'CHTS and Relevant Versions of GBCS', including the CHTS v1.0 and the Relevant GBCS v1.1. The Installation End Date for this combination was 30 April 2023 and had a Maintenance End Date of 31 May 2023. These dates have already been extended once as part of [MP221 CHTS v1.0 and GBCS 'v1.1 Installation End Date and Maintenance End Date'](#). When this modification was raised there was an approximately 200,000 uninstalled Communications Hubs.

The previous extension was three months. This timeframe was expected to be sufficient to allow Suppliers to locate and install this stock. However, Drax is aware of approximately 120,000 uninstalled Communications Hubs which are compliant with these specifications and not yet installed, across the industry.

What is the issue?

The dates in the TSAT provide the final date that these Communications Hubs can be installed. Any stock remaining after this time will not be compliant, meaning the installations of these specific versions of Communications Hubs will not count towards any install targets and will need to 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. The introduction of 4G Communications Hubs is anticipated for July 2025. It is also anticipated that the rollout of 4G Communications Hubs will be undertaken slowly 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 would allow Parties to fall back on the remaining stock, whilst having compliant installations.

What is the impact this is having?

As the dates have passed, any remaining uninstalled stock is non-compliant with the SEC and will need to be scrapped or returned, incurring a financial and environmental cost. The returns process cannot support large volumes of returns in a short period. Another modification, [MP252 'Amending the process for Communications Hub returns'](#) is aiming to address the current issues of large volume returns of Communications Hubs.

Impact on consumers

Scrapping this remaining stock could result in fewer energy consumers gaining access to the benefits of smart metering in the immediate future.

3. Assessment of the proposal

Areas for assessment

Length of End Date extension

The Proposer has suggested extending the CHTS v1.0 and GBCS v1.1 Installation End Date to allow Suppliers to install the Devices. There has been challenges in meeting the previous extension such as installation disruptions caused by social distancing restrictions. Suppliers inheriting expired Communications Hubs via Supplier of Last Resort (SoLR) have also played a part in Suppliers being unable to meet the previous extension.

Smart Energy Code and Secretariate (SECAS) will gain feedback on the length of time that the existing End Dates should be extended by during the Refinement Process.

Installation End Date only or Maintenance End Date as well?

The Proposer has suggested extending Installation End Date. The Data Communications Company (DCC) have previously stated that is normal business to upgrade Devices regardless of the TSAT expiry, meaning only the Installation End Date would require an extension.

Previous TABASC recommendation?

During discussions surrounding [MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'](#) Technical Architecture and Business Architecture Sub Committee (TABASC) had expressed in July 2023 that only the Installation End Date should be extended. The rationale behind this decision is that after installation the DCC will, under all reasonable steps, carry out firmware upgrades to bring Communications Hubs into compliance.

Previous OPSG recommendation?

In December 2023 the DCC presented an overview of the TSAT expired Communications Hubs, including three proposed options for resolving the issue. They were the following:

1. Customers attempt to locate stock or declare as lost
2. Customers continue to install
3. Customers continue to install and raise a SEC Modification

The DCC described how the Communications Hubs could be grouped into three batches, according to the effort required to update them to current standards. The estimated number of affected Communications Hubs as at November 2023:

1. Can be upgraded with a single firmware update (approximately 88,000 Communications Hubs)
2. Can be upgraded with multiple firmware updates (approximately 44,000 Communications Hubs)
3. Can not be upgraded (approximately 1200 Communications Hubs)

An OPSG member suggested that as the Devices have been paid for, the return cost should be lowered. The DCC countered highlighting that Suppliers should be installing older versions before newer versions. The OPSG Chair noted that they understood Communications Hubs had been included in the planning that was taking place regarding continuity of Communication Hub during 4G rollout. This is further being considered by the Communications Transition Group (CTG).

The OPSG concluded that this should be a Supplier driven process. The Suppliers had the motivations to locate the Communications Hubs and deal with them. It was the responsibility of the Supplier to be compliant with the SEC, and if a SEC Modification were needed, a Supplier should raise it. As such, Drax has raised this modification.

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the TABASC, the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Determine if the Proposed solution is an appropriate period of time to extend the existing End Dates by.
SMKI PMA	No input sought.
SSC	Determine whether there are any security risks by extending these Validity Periods.
TABASC	Determine if this is an appropriate period of time to extend the End Dates by.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	9 Jan 2024
Presented to CSC for initial comment	16 Jan 2024
<i>Modification discussed with Sub-Committee Chairs</i>	<i>17 Jan 2024</i>
<i>Modification discussed with TABASC</i>	<i>1 Feb 2024</i>
<i>Modification discussed with OPSG</i>	<i>13 Feb 2024</i>
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>19 Mar 2024</i>
<i>Modification Report approved by CSC</i>	<i>19 Mar 2024</i>
<i>Modification Report Consultation</i>	<i>20 Mar 2024 – 12 Apr 2024</i>
<i>Change Board Vote</i>	<i>25 Apr 2024</i>

Italics denote planned events that could be subject to change

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
CSC	Change Sub-Committee
CTG	Communications Transition Group
DCC	Data Communications Company
GBCS	Great Britain Companion Specification
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SoLR	Supplier Of Last Resort
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specification Applicability Tables