

James Cosgrove
By email

31 January 2025

SEC Panel Assessment ECoS BMPPA

Dear James,

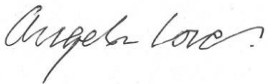
The SEC Panel has assessed the DCC performance against the criteria in the Enduring Change of Supplier (ECoS), Baseline Margin Project Performance Adjustment (BMPPA). Details against each of the Aspects of the BMPPA are Annexed to this letter.

The SEC Panel discussed the issues of assessing the DCC performance against the terms of the BMPPA at its meetings 17 December 2024 and 28 January 2025. On both occasions the Panel noted their disappointment with the levels of engagement from SEC parties in providing their views. SEC Panel members further noted that the ECoS programme sits under transitional governance, and this may have contributed to the low levels of participation in the assessment process, given day-to-day programme decisions were taken outside SEC, with only general updates provided to Panel and Sub Committees. The Panel however noted that SECAS has undertaken reviews of minutes and endeavoured to obtain views from parties beyond the surveys completed pre and post migration.

SECAS undertook surveys of SEC Parties pre and post migration. The views provided suggest that the programme undertaken by the DCC got off to a slow start, which has led to delays to the start of the migration. There was also some confusion amongst Parties as to engagement from the DCC, particularly concerning difficult to migrate devices, with a split in the level of understanding across large suppliers and those in other categories. Overall, however, the migration itself appears to have been undertaken with no major issues reported.

Should you wish to discuss any of the areas of the assessment further please contact SECCo Head of Code and Regulatory Strategy, Alina Bakhareva at alina.bakhareva@seccoltd.com

Yours Sincerely,



Angela Love

SEC Panel Chair

Project Activity 2

Table A – Assessment Criteria in relation to Specified Step A.

Aspect	Assessment Questions	Weighting
Running the ECOS Project	Has the DCC run the ECoS project in a timely way such that either: it has not been necessary for it to rely on services provided to it under the DSP contract when acting as the CoS Party under the Smart Energy Code past 31 October 2023; or to the extent that it has been necessary to continue to have such arrangements in place, has this been because of factors outside DCC's reasonable control?	70% (or 100% if the contractual arrangements for TCoS under the DSP contract have been extended beyond October 2023)
Managing the Contractual Arrangements	Has the DCC managed its Service Provider contracts such that DSP contract arrangements applying to TCoS have been terminated, and any consequential contractual savings have been realised.	30% (or 0% if the DSP contractual arrangements for TCoS have been extended beyond October 2023)

Given the number of changes to the Joint Industry Plan milestones relating to the ECoS Programme, the original timeframe was not able to be maintained from the start of the Programme, and a delay of c.12 months arose. Regular updates were provided to Parties via transitional forums such as the Implementation Manager Forum (IMF). In review of feedback, the DCC perhaps underestimated the complexity of the requirements for its Service Providers to deliver on the original LC13 plan timeframe. The DCC may also have underestimated or not initially realised the need for Parties to be ready, particularly manufacturing supply chains. Parties feedback suggest that the DCC needed an end to end full understanding of the value chain, to avoid issues which later materialised and led to delays and changes to the original plan.

Scores

Aspect	Score
Running the ECOS Project	1
Managing the Contractual Arrangements	1

Table B – Assessment Criteria in relation to Specified Step B

Aspect	Assessment Questions	Weighting
Identification of difficult to migrate devices	Has the DCC proactively identified, at an early stage (i.e. in sufficient time to allow device manufacturers time to resolve any issues prior to the end of the ECoS Migration Period), difficult to migrate Devices? Has the DCC notified suppliers and other interested parties of these Devices and explained the reasons for why they are difficult to Migrate?	70%
Support and assistance	Has DCC provided support and assistance (where appropriate) to Energy Suppliers in order to address the difficulties such that the Devices were or will be able to be migrated?	30%

In accordance with SEC Appendix AS – ECoS Transition and Migration Approach Document a list of all non-migratable devices was published 29 June 2023, prior to the DCC attempting to start migration from TCoS to ECoS.

In addition, Energy Suppliers were individually notified of un-migratable devices via a report made available to them on the DCC SharePoint.

At least one Large Energy Supplier has fed back that they did receive prior notification, and they understood the reasons for devices not being migrated. This detail was also made available to Suppliers via the DCC SharePoint site and discussed in regular supplier engagement sessions with the DCC. However, the Supplier notes that only two reports were generated.

A Small Energy Supplier provided a significantly different experience. They were of the view that they had not been engaged at all pre migration and have received only minimal advice post migration. The small supplier notes that they have not been advised whether they have any non-migratable devices within their portfolio.

The DCC has made available the list of non-migratable devices and contacted Parties with non-migratable devices. However, what is perhaps less clear to all SEC Parties is that the DCC did not contact Parties that did not have non migratable devices in their smart metering portfolio. The rationale from the DCC was that there was no need to do so. With the benefit of hindsight, this perhaps should have been made clearer.

From the responses that have been received and the engagement that was taken by the DCC with the SEC Panel, it is apparent that the DCC has identified at an early stage difficult to migrate devices and their engagement in this regard was good. However, the communication with which the approach taken to managing all Suppliers could have been clearer.

Scores

Aspect	Score
Identification of difficult to migrate devices	3
Support and assistance	2

Table C – Assessment Criteria in relation to Specified Step C

Aspect	Assessment Questions	Weighting
Planning	Did the DCC have an effective plan to minimise the number of devices still in (or still to enter) the supply chain and which hold TCoS Certificates by 31 October 2024? Was the DCC's plan for managing this aspect of the ECoS Programme effectively communicated to relevant parties, and were their views taken into account in finalising those plans? Did the DCC put this plan into effect?	33⅓%
Management	Were ECoS Certificates made available at a suitably early stage in order to minimise the number devices in (or still to enter) the supply chain that hold TCoS Certificates by 31 October 2024? Did the DCC effectively engage with Energy Suppliers to help ensure coordinated action to minimise the number of such devices by 31 October 2024? Did the DCC provide the support that it could reasonably be expected to provide in managing any issues in this area?	33⅓%
Communication	Did the DCC seek industry views on its plan to minimise the number of devices in the supply chain that hold TCoS Certs by 31 October 2023 and take them into account when finalising that plan (and explain how it has done this)? Did DCC effectively communicate with relevant parties as was necessary to give effect to the plan?	33⅓%

There was good engagement, which was confirmed by a Large Energy Supplier who was broadly happy with the engagement provided by the DCC to all Aspects. There was consultation on the approach taken by the DCC and there were meetings in which the content was conveyed to industry through Supplier engagement sessions, transitional governance forums and other forums. The good engagement unfortunately did not translate to good delivery.

The DCC provided an initial plan to minimise the number of devices in the supply chain with TCoS certificates. However, there was a delay to the issuing of the User Interface Test certificates which resulted in the plan not being workable and the programme was therefore delayed with a consequential result the migration did not start for more than a year after the initial milestone in the plan.

While there was good engagement, this did not translate to acting in the best interests of Energy Suppliers. From the outset, Suppliers were of the view that a Private Key Transfer (PKT) was required for successful ECoS migrations. However, initially the DCC was far too optimistic about the expected success rate of the ECoS migrations as they did not consider potential issues that could impact migration such as non-communicating devices and failed WAN. These issues necessitated a PKT solution from, but the delivery of PKT was only confirmed to mitigate for the late delivery of ECoS manufacturing packs. This resulted in an avoidable delay to the decision-making process which in turn caused delay to the plan and an increase in costs.

A small Supplier was of the view that there was insufficient communication from the DCC in the planning phase and there was very little communication during the migration process. However as noted above we believe the DCC took an approach to engage directly only with parties impacted.

Scores

Aspect	Score
Planning	2
Management	1
Communication	2

Table D – Assessment Criteria in relation to Specified Step D

Aspect	Assessment Questions	Weighting
Timing and frequency of engagement	Has the DCC effectively informed its customers of any interactions that they will (or can be expected to) have in relation to the delivery of the Enduring Change of Supplier in a timely manner and with an appropriate frequency of engagement?	20%
Quality of information provided by the DCC	Has the information that the DCC has communicated been of sufficient quality and detail?	30%
Taking account of customer views	Has the DCC consulted with relevant customers on the way in which it should engage with them in relation to their interactions? Has the DCC taken customer views into account when making decisions about how customer interactions should be managed? Has the DCC communicated a clear rationale for such decisions, explaining how customer views have informed its decision making and where relevant why the DCC has decided not to incorporate customer views?	50%

There was considerable engagement with a majority via transitional governance forums, bi lateral discussions with impacted Parties and updates to SEC Panel Sub-Committees across the programme. However, it should be noted that the views of Parties were not taken into account for the PKT element of the solution, and this was perhaps not adequately explained. It is apparent that while the communication of the plan and approach was regular, it was not effective in that it did not take into account views that did not accord with that of the DCC and there was not adequate explanation at the time as to why.

Small Suppliers noted that there was an introductory session held at the start of ECoS, however this appeared to be perfunctory as the DCC they felt did not listen to the opinions expressed and were set on following the plan that the DCC had developed. In the meeting it was expressed that attendees

had experience of certificate exchange activity and possible pitfalls, but the DCC displayed a lack of interest in taking on board any of the feedback.

We are therefore of the view that while there was a significant amount of engagement, the engagement was not meaningful as it did not take into account the concerns that were raised during the feedback and did not provide explanations as to why the suggestions from Parties were not taken forward at the time.

Scores

Aspect	Score
Timing and frequency of engagement	2
Quality of information provided by the DCC	2
Taking account of customer views	1

Annex 1 – Feedback from SEC Parties

Survey of SEC Parties 03 October 24 – 06 November 24

Identification of Difficult to migrate devices

<i>Did the DCC proactively identify, at an early stage (i.e. in sufficient time to allow device manufacturers time to resolve any issues prior to the end of the ECoS Migration Period), difficult to migrate Devices?</i> <i>Did the DCC notify Energy Suppliers and interested parties of these Devices and explained the reasons for why they are difficult to Migrate?</i>		Score
Respondent 1	We were notified of un-migratable devices in the ECOSMIG-003 report on DCC SharePoint, but only two reports were generated, one in October and one in November of 2023. No further reports were produced, which either means all were successfully migrated after the first two month or the reports weren't generated after that point	2-3
Respondent 2	No proactive contact from DCC. When we contacted DCC on the back of their "ECoS Migrations Cease on 19 July 2024 - REQ000000237062" communication we received only general guidance on what devices might not have ECOS certs. We have not received of a definitive list of devices still on TCOS certs or any guidance on when TCOS certs will cease to be supported (including what notice will be given of end of support for TCOS).	0

Support & Assistance

<i>Did the DCC provide support and assistance (where appropriate) to Energy Suppliers to address the difficulties such that the Devices were able to be migrated?</i>		Score
Respondent 1	No specific assistance was sought or given.	3
Respondent 2	Virtually no communication from DCC throughout the migration process	0

Planning

<i>Did the DCC have an effective plan to minimise the number of devices still in (or still to enter) the supply chain and which hold TCoS Certificates by 31 October 2024?</i>		Score
Respondent 1	Initially, yes, there was a plan to deliver the new ECoS manufacturing packs in advance of the TCoS solution withdrawal. However, due to an issue with generating the new UIT certificate packs, that did not happen.	3
Respondent 2	No communication from DCC	0
<i>Was the DCC's plan for managing this aspect of the ECoS Programme effectively communicated to relevant parties, and were their views taken into account in finalising those plans?</i>		Score
Respondent 1	Yes, Suppliers were consulted about the proposal to deliver the ECoS manufacturing packs after ECoS go live. We were given assurances that acceptance of the later delivery date would be mitigated by delivery of the Private Key Transfer (PKT) solution to avoid the 'cliff edge' when TCoS was switched off	2
Respondent 2	No Communication from DCC	0
<i>Did the DCC put this plan into effect?</i>		Score
Respondent 1	Yes – the PKT solution was eventually delivered and is now in Production	3
Respondent 2	No Communication from DCC	0

Management

<i>Were ECoS Certificates made available at a suitably early stage to minimise the number of devices in (or still to enter) the supply chain that hold TCoS Certificates by 31 October 2024?</i>		Score
Respondent 1	No. Delivery of the new ECoS manufacturing certificate packs was delayed by more than 12 months due to an issue with the initial delivery of new UIT manufacturing packs, which resulting in Suppliers having to continue ordering devices with TCoS certificates on them. To date, the production manufacturing packs are still not available, although they are due in January 2025.	1
Respondent 2	No communication or support to Supplier through the migration process. (Possible that there was communication with MAPs - unable to confirm this)	0
<i>Did the DCC effectively engage with Energy Suppliers to help ensure coordinated action to minimise the number of such devices by 31 October 2024?</i>		Score
Respondent 1	There was engagement via the DCC Supplier sessions. The proposal to manage this risk was to deliver the Private Key Transfer (PKT) solution, which would enable all remaining TCoS certificates that had not been migrated prior to the TCoS solution being switched off, to be loaded into ECoS. Whilst this was the correct approach the decision to deliver it was left very late in the delivery programme. In addition, despite Suppliers having been asked to agree to late delivery of the ECoS certificate packs if we also got the PKT solution, there was a subsequent attempt to rescind the commitment to deliver PKT on the grounds of cost. This was unanimously rejected/objected to by Suppliers	2
Respondent 2	No communication or support to Supplier through the migration process. (Possible that there was communication with MAPs - unable to confirm this)	0
<i>Did the DCC provide the support that it could reasonably be expected to provide in managing any issues in this area?</i>		Score
Respondent 1	No, in my opinion the DCC were not sufficiently protecting the Suppliers' interests in their initial resistant to delivering the PKT solution. Delaying the decision to deliver that functionality would have impacted cost and ease of delivery	2
Respondent 2	No communication or support to Supplier through the migration process. (Possible that there was communication with MAPs - unable to confirm this)	0

Communication

<i>Did the DCC seek industry views on its plan to minimise the number of devices in the supply chain that hold TCoS Certs by 31 October 2023 and take them into account when finalising that plan (and explain how it has done this)?</i>		Score
Respondent 1	Yes, Supplier views were sought via the DCC Supplier meetings, however both the DCC and the ECoS solution provider were resistant to considering a Private Key Transfer solution in the early stages of the ECoS design. Supplier concerns about the 'cliff edge,' where devices that still had TCoS certificates following ECoS go live would be unable to undergo a change of supply, were deemed to be a supply chain management issue that we should manage. So the DCC did seek industry views, but didn't really listen to what they were being told, or appropriately assessing their own top-level data. Initially, the DCC was far too optimistic about the expected success rate of the ECoS migration, not taking into account non-communicating devices, failed WAN and other scenarios that would prevent successful migration. This alone necessitated a PKT solution from a Supplier perspective, but the delivery of PKT was only confirmed to mitigate for the late delivery of ECoS manufacturing packs.	2
Respondent 2	No Communication from DCC through migration	0
<i>Did DCC effectively communicate with relevant parties as was necessary to give effect to the plan?</i>		Score
Respondent 1	Yes, the plan to deliver ECoS was effectively communicated via the Supplier engagement sessions, TBDG and other Industry forums.	3
Respondent 2	No Communication from DCC through migration	0

Timing and Frequency of Engagement

<i>Did the DCC effectively inform you of any interactions in relation to the delivery of the Enduring Change of Supplier in a timely manner and with an appropriate frequency of engagement?</i>		Score
Respondent 1	<i>The frequency of engagement was sufficient</i>	3
Respondent 2	No communication from DCC until email Thursday, July 18, 2024 3:58 PM Subject: ECoS Migrations Cease on 19 July 2024 - REQ000000237062	0

Quality of Information provided by the DCC

<i>Has the information that the DCC has communicated been of sufficient quality and detail?</i>		Score
Respondent 1	Yes	3
Respondent 2	No communication until we challenged the DCC 'ECOS Migrations Cease' email - still awaiting clarity on specific meters not migrated and end of support for TCOS	0

Taking account of Customer Views

<i>Did the DCC consult with you on the way in which it should engage with you in relation to its interactions?</i>		Score
Respondent 1	We are not aware of any reported issues here, so have responded '3'	3
Respondent 2	No Comment	0
<i>Did the DCC taken your views into account when making decisions about how customer interactions should be managed?</i>		Score
Respondent 1	As described above, the DCC did seek our views, but didn't listen to what was being said, until later in the delivery process, which made it more expensive to deliver or fix – e.g. decision to deliver Private Key Transfer.	2
Respondent 2	No Comment	0
<i>Did the DCC communicate a clear rationale for such decisions, explaining how your views have informed DCC decision making and where relevant why the DCC has decided not to incorporate customer views?</i>		Score
Respondent 1	The post install communications and support from the Accenture ECoS team has been good.	3
Respondent 2	DCC did hold an introductory session at the very start of ECOS - however they didn't listen and seemed set on just following the plan they already had. (e.g. I volunteered that we had experience of certificate exchange activity and possible pitfalls - there was no interest from DCC representative in taking this further).	0

Survey Responses June 2023 Pre-Migration

Surveys conducted prior migration to gauge level of engagement and awareness

Aspect of customer engagement	Assessment questions	SEC Party Score (0 to 3)
1. General	Are you aware of the DCC ECoS programme? (Please provide any additional comments to support your answer)	
Respondent A	The assessment score is based on us knowing, not about whether DCC have met this.	n/a
Respondent B	Yes	n/a
Respondent C	Yes	n/a
Respondent D	No Response	n/a
Respondent E	I am aware of the programme but I do not feel the benefits of the programme have been well explained to industry stakeholders.	n/a
2. Quality of Information	If Yes to Question 1, Do you consider the timing and quality of the information to be useful in your preparation for the ECoS migration? (Please provide your rationale to support your answer)	Score
Respondent A	The timing and quality of information provided has been sporadic and is very dependent on if you attend particular industry meetings or not. The general drop in engagement sessions were useful, but have recently all been cancelled with nothing to replace them – at a critical time in the Programme and when issues have arisen. It has also been highlighted recently that issues were identified in the past with aspects of the Programme, which have not been reported to all industry parties. It is therefore hard to place reliance on information provided by the Programme and make key, informed decisions when we do not appear to be receiving complete, accurate or timely information.	1
Respondent B	Workshops were arranged at an appropriate time and the content was useful. However, from the end of 2022 to Q1 2023, information flow stopped for a while.	2

Respondent C	We believe the timing has been useful in our preparations and were made aware of the programme and what it entails in enough time to prepare for the migration. We found the initial ECoS summit that was held in London April 22 particularly informative and productive, and it was an opportunity to raise our concerns early on. Regular updates have been given via various forums which has been useful.	2
Respondent D	No Comment	3
Respondent E	The realisation that we had to take action (for example with system upgrades) seemed to come very late in the process and I am still not clear on what actions we need to take where meters fail to migrate (e.g. due to comms issues). The information provided has been extremely technical and gave the impression that ECOS is a “background” change, but then it became apparent that we as a supplier had to take actions. I still do not have full confidence that we understand all the actions we have to take as the programme progresses, the timing of these and the consequences of inaction.	1
3. Timing of Engagement	<i>Has the DCC explained how it plans to communicate with you throughout the ECoS programme?</i> <i>(Please provide examples or comment to support your answer)</i>	Score
Respondent A	At a workshop around a year ago it was clear, but this has not been adhered to, certainly recently.	1
Respondent B	Yes, this has been made clear.	3
Respondent C	We are aware that the ECoS reporting will be available via the DCC SharePoint and if there are any issues or incidents this will be communicated via the usual Incident Management Channels. What we are struggling to understand is how DCC will communicate with the right stakeholders within the business when there is no plan to set up an ECoS NCL role (confirmed today). Any general ECoS communications with therefore not be targeted and how will we know that they are going to the right people? We are not sure that this has been considered and do not want communications being sent to anyone on the NCL as this leads to confusion. It would be great to understand how this will be combatted. There are also a number of reporting roles on the NCL, communications that reports are available are sent to those that have a particular role. Will there be similar communications to let us know that reports are available, and will these just go to everyone? This is unknown currently and requires further consideration.	2

Respondent D	No Comment	2
Respondent E	I'm not clear on what happens now after the systems upgrades we have completed.	1
4. Taking views into account	<i>Has the DCC taken your views into account when making decisions about the ECoS programme? Has DCC explained the rationale for its final decisions? (Please provide examples or comment to support your answer)</i>	Score
Respondent A	As a Meter Asset Provider we have different priorities and focus areas to the DCC (i.e. our key concern is ECOS impacts to smart meters and meter manufacturers, not comms hubs), when we raise these it does not always seem that these are taken into account or considered.	1
Respondent B	We asked for separate physical identification of the CHs between those with TCOS and ECOS certs: DCC denied this request. It was decided that identification was not required without consultation. When raised at IMF, DCC ruled this out. Reporting was also requested on multiple occasions to show migration failures on a monthly basis rather than one bulk report, but this request was turned down.	1
Respondent C	In the main we believe that our views have been taken into consideration, and we have been consulted at appropriate times, however, there has been one view throughout that was expressed by numerous parties that we do not feel DCC came to the right decision on and do not feel that the rationale is sufficient. This was regarding the labelling of ECoS devices so that we could prioritise TCoS installs as instructed in the ETMAD. Although a rationale was given, we challenged this, but do not feel that our needs and obligations were considered.	2
Respondent D	No Comment	2
Respondent E	As the programme has remained in a very technical space, it has not been easy to contribute.	1
5. Running the ECoS project	<i>The DCC has modified the Data Service Provider (DSP) contract to provide Transitional Change of Supplier (TCoS) Party related services beyond October 2023. Do you consider the reason for the DSP contract extension is due to factors outside the reasonable control of the DCC? (Please provide your rationale to support your answer)</i>	Score
Respondent A	Not able to give a view on this as not informed why it had been extended.	1

Respondent B	No, we believe that DCC didn't start the project early enough, hence causing the need for extension to the TCOS service. Secondly, the delay in the device cert manufacturing packs may introduce further risk of delay.	1
Respondent C	We made it clear, as did MAP representatives and others, that the DCC needed to look wider than a clean cut off date to close the TCoS service. It is not about this being outside of the DCC control but the fact that all factors impacting why devices out there will still have TCoS certs needed to be considered. It seemed certain assumptions had been made, and delays in the requested Manufacturer Pack being issues, meant there was not a full understanding of the end to end management of certifications that closing the TCoS service too early did not fully capture. We are unsure how that could be considered to be completely outside DCC's control though.	1
Respondent D	No Comment	No Score
Respondent E	I don't have sufficient knowledge to answer this question and would need a better understanding of the TCoS services to do so.	1
6. Identification of difficult to migrate devices	Has the DCC proactively made you aware of any difficult to migrate devices? (Please provide any examples or comment to support your answer)	Score
Respondent A	As above, if you do not attend the TAG meeting, you do not get to hear about any testing issues or potential issues with migration – this has happened recently and it is only by chance this information was notified – I do not believe it has been shared more widely.	1
Respondent B	Not currently. DCC seem confident that migration will be trouble free. We do not share that confidence. This area is difficult to score at this time. This has been mitigated by the transfer of private keys to the ECOS party.	2
Respondent C	Not yet. DCC stated today that they are talking to 1 Meter Manufacturer about a small number of devices that have issues with migrations. DCC have listed accounts of 10k devices but are not ready to announce they are non-migratable. Testing has only just started.	No Score
Respondent D	No Comment	3
Respondent E	Not aware of this	1

7. Support for difficult to migrate devices	Are you aware of any support or advice from the DCC to manage difficult to migrate devices? (Please provide any examples of advice provided or comment to support your answer)	Score
Respondent A	I have requested further information on the issues discussed at the TAG but have not received anything further.	0
Respondent B	Yes. The DCC advice is to upgrade the device to a later firmware version. However, there could be multiple other issues that have not been addressed with advice from the DCC.	2
Respondent C	Nothing yet. We're aware there WILL be support and ELS management offered but are still awaiting publication of the guidance and how this will all work.	No Score
Respondent D	No Comment	3
Respondent E	No.	0
8. Planning & Communication	Has the DCC asked you for your views on how to minimise the number of devices that hold TCoS certificates in your supply chain, by 31 October 2024? (Please provide any examples or comment to support your answer)	Score
Respondent A	We have repeated been told that there will be no issue with holding TCOS devices after this date due to the private key transfer process - though we are awaiting more detailed information on this. Given the recent issues around the manufacturer certificates and aligning new certificates with other certificate changes, this cannot be expected to be completed now. There will be more TCOS devices produced and in the supply chain than originally expected.	1
Respondent B	We do not believe we have been asked for our views on this topic. The delayed cert manufacturer packs will increase the number of TCOS devices in the supply chain. However, before the ETMAD change, we were led to believe that we would not be able to install TCOS cert devices with ECOS devices, but that is now allowed.	1
Respondent C	This is an odd question to ask of DCC Users. Do you not have an understanding of who you have spoken to? This seems to be asking us what you have done and if you've done it. There are many different areas affected by management of certs on devices, so hard to identify who has been spoken to and how.	No Score

Respondent D	No Comment	0
Respondent E	I'm not aware of this but may of course have missed it somewhere in the large volume of communications around Smart.	0