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Smart Energy Code

DP305

Communications Hub Returns Process Review

Modification Report

Version 0.3

14 July 2026

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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This document also has one annex:

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

Contact

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1. Summary

This proposal has been raised by Emslie Law from OVO.

The Proposer has identified a number of areas where the current returns process for Communications Hubs (CH) as stated in the SEC either has gaps or is being misinterpreted. This is resulting in visual inspections being failed, triage prevention, fully functional CHs being returned unnecessarily, as well as other issues. This is resulting in additional costs to the industry and delays to fixes for Consumers.

The proposed approach is to conduct a review of the CH returns process inclusive of the physical onsite returns process and also the processes that surround this. This is necessary to ensure that there is a robust process in place for the industry and the associated costs and reporting.

2. Issue

What are the current arrangements?

The Data Communications Company (DCC) provides a returns process for CHs. The aim being that these can be triaged, refurbished and reissued. SEC Section F 'Smart Metering System Requirements', specifically clause F8 'Removal and return of SMETS2+ Communications Hubs', and SEC Appendix I 'CH Installation and Maintenance Support', specifically clause 9 'Communications Hub removal and Notification of returns' and clause 10 'Communications Hub returns' outline the responsibilities and processes that need to be followed for CH returns.

What is the issue?

The process within the SEC for CH returns has multiple gaps or requirements for clarity to aid a successful process and enable better reporting for the CH returns process for industry.

Potential misinterpretation of the SEC returns process

The current SEC returns process is potentially being misinterpreted and being treated as a refurbishment process instead of a fault triage process. This is mainly due to the visual inspection element of the process and the criteria of the visual inspection.

In SEC Appendix I clause 11.5(a) 'Visual Analysis' it advises the visual inspection is to also look for any physical damage to the outer casing, external interfaces and connectors. However, because this statement does not specify what classifies as physical damage to the outer casing, the industry is seeing CHs with stickers, pen marks and small scratches fail the visual inspection and not be passed through to triage, causing a misrepresentation of CH faults found in the field. The Proposer is seeing on average 20% of Arqiva and 35% of Virgin Media O2 (VMO2) faulty CHs fail the visual inspection.

The Proposer would like to see clarity or a change in the process itself to ensure that this type of visual inspection is only completed prior to a triage of the fault being completed.

Misalignment on CH returns categories

There is a misalignment on categories available for returning a CH. The term of 'Lost or Stolen' is often used to return CHs that have passed over the 90-day Service Level Agreement (SLA) as it does not have its own category and CH return. The term 'No fault found' is often used to return CHs that have failed at install process as they are not able to be passed back out the field for reuse.

There would be benefit in a review of the categories available, and what they are used for and why. In addition, there is an opportunity to look at how this process can be simplified to ensure correct categories are used, and aid reporting.

Redundant CH returns

Currently, industry is having to return perfectly working CHs due to the inability to recognise if the Device has been commissioned. This is inflated with issues seen in Communication Service Provider (CSP) North where there have been issues with the lights on CHs operating correctly putting into dispute the CH status. All CHs that are returned are then at the cost of the industry as there is no other process to enable these CHs to go out to other Consumer properties without first returning the CH to the DCC.

CH Batch Fault

The CH Batch Fault definitions only allow for something to be considered a batch fault based on it impacting a specific delivery batch delivered to one location (a single Party) in a single month which does not allow for the investigation and considerations needed for actual batch faults that occur. A recent example is the red-light Issue in CSP North which is not considered a Batch Fault as it went to multiple parties and locations. A review of the definitions for Batch fault and type fault are required and the percentages associated with these faults for compensation. This highlights the need for the process and reporting accuracy to be reviewed.

A review of the CH returns process is required to address the points raised and also to enable the right assurance is in place for industry for a robust process for CH returns and the associated costs and reporting.

What is the impact this is having?

The current process is causing CHs to be disposed of without triage, impacting costs to industry and an inaccurate reflection of the faults in the field. This has been resulting in delays to fixes for Consumers. At present only 30% of all return records that have been raised in 2025 have been returned to the DCC.

Impact on consumers

The current process is causing CHs to be disposed of without triage. Impacting costs to industry and causing an inaccurate reflection of the faults in the field, resulting in delays to fixes for Consumers.

What is the priority of this modification?

The priority of this modification has been determined as **High**. This rating is based on perceived impacts on:

- Smart & Retail Operations.

Please refer to **Appendix 3** for a full breakdown of how the priority score was calculated.

3. Assessment of the proposal

Areas for assessment

Scope

The SEC Change team will look to determine whether changes will be specific to that of just 4G CHs or inclusive of 2G and 3G CHs as well.

Type of changes

The SEC Change team will look to determine whether the review is focusing solely on legal text wording changes within the SEC or also looking at DCC System changes to support the CH returns process.

Sub-Committee input

The SEC Change team have engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Testing Advisory Group (TAG), the Security Sub-Committee (SSC), Privacy Sub Committee (PSC), The Performance Assurance Board (PAB), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and the Finance Sub-Committee (FSC) to confirm what input is required from these forums. SEC Change believe the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
FSC	We do not believe this modification will have any FSC impacts
OPSG	Operational impacts from changes required to the existing process
PAB	We do not believe this modification will have any PAB impacts
PSC	Impacts due to Data that is held on CHs
SMKI PMA	We do not believe this modification will have any SMKI impacts
SSC	Security impacts from any process changes resulting from the review
TABASC	Impacts from changes to business processes.
TAG	We do not believe this modification will have any Testing impacts

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	13 Oct 2025
Presented to CSC for initial comment	21 Oct 2025
Modification discussed with the Security Sub-Committees	25 Feb 2026
Modification discussed with OPSG	10 March 2026
Modification discussed with the Privacy Sub-Committee	16 April 2026
<i>CSC converts Draft Proposal to modification Proposal</i>	<i>21 July 2026</i>
<i>Refinement Consultation</i>	<i>Aug 2026</i>
<i>CSC Progresses modification to Report Phase</i>	<i>Sep 2026</i>
<i>Modification Report Consultation</i>	<i>Sep - Oct2026</i>
<i>Change Board Vote</i>	<i>Oct2026</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
CH	Communications Hub
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
FSC	Finance Sub-Committee
OPSG	Operations Group
PAB	Performance Assurance Board
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SLA	Service Level Agreement
SMETS	Smart Metering Equipment Technical Specifications
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Assurance Group

Glossary	
Acronym	Full term
VMO2	Virgin Media O2

Appendix 3: Prioritisation Matrix

Strategic Direction Statement Prioritisation				
SDS Alignment	Importance	Complexity	Overall Total	Priority
2	3	3	8	High

SDS Alignment – The Proposed Solution of this modification would support two aspects of the SDS, which are:

- Smart & Retail Operations.

Importance – The Proposed Solution would deliver a streamlined and enhanced triage process which would ensure that maximum benefit is achieved from existing CHs. Reducing volumes of working CHs being disposed of.

Complexity – Although the CH returns process in it's entirety is a complex process this would be a text-only change to the SEC and therefore is believed to be a straightforward change.