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MP262 ‘Extending the Installation End Date for CHTS v1.0 and GBCS v1.1’ Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

Smart Energy Code Administrator and Secretariat (SECAS) received five responses to the Modification Report Consultation. Three respondents believed that the modification should be approved. They considered the modification better facilitated SEC Objective (a)¹. One respondent abstained and another believes this modification should be rejected.

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

Modification Report Consultation responses

Summary of responses

Two respondents (Small Suppliers) believe that approving the modification would permit large numbers of Communication Hubs to be installed, preventing them from being scrapped which will impact the environment and cause financial costs.

Another respondent (Large Supplier) considered that the argument was negated due to the age of the Devices and the potential for a second site visit to be conducted to remediate any issues caused by upgrade failures. They also stated that the financial cost of a second visit may be carried over by a churn Supplier.

One respondent (Large Supplier) believed that this modification should be rejected. They noted the Technical Architecture and Business Architecture Sub-Committee (TABASC) did not recommend extension of the dates. The respondent commented that there should not be official support for Communications Hubs that have known defects, and which do not support a prepayment customer.

One respondent (Small Supplier) also highlighted that the DCC has been unable to facilitate large amounts of returns simultaneously therefore returns have not been an option.

Another respondent (Large Supplier) noted that the previous end dates expired 14 months ago and queried what has been happening with these Devices since then.

One respondent (Large Supplier) abstained noting that there is no direct benefit to their organisation from this modification being implemented. They support the views from TABASC that the Communication Hubs can still be installed and therefore the main impact this modification is attempting to address is whether the installs would be considered in Suppliers' roll out targets.

Change Board vote

Change Board Vote (June 2024)

A Change Board member (Large Supplier) advised that they had originally responded to the Modification Report Consultation in support of this modification being implemented, however they now have concerns about non communicating Devices. They believed that non-communicating Devices are a bigger risk than stranded stock. They noted that extending the TSAT could introduce a risk that older Devices may be redistributed which could have negative impacts across the industry.

The TABASC Chair was present during the meeting and stated that there was no technical blocker to preventing a Communications Hub on CHTS v1.0 and GBCS v1.1 from being installed, but it would not count towards Suppliers roll out targets. They highlighted the importance of Devices being upgraded in the shortest time possible to ensure the Devices are operating as intended. They questioned whether installs would count towards roll out targets if the Devices are upgraded following install. The TABASC Chair advised if MP262 is approved, the TSAT becomes insignificant as it will continue to be extended and not drive the intended behaviour.

A Change Board member (Large Supplier) noted that the DCC is responsible for upgrading the Communications Hubs and noted this would still leave the Supplier at risk if the DCC did not upgrade Devices in a timely manner.

The Proposer also queried whether, if approved, installs would be able to count retrospectively towards the roll-out targets.

SECAS and Ofgem were not able to answer these two questions during the meeting and Change Board decided the modification was not able to be voted upon until this information was provided.

Following the meeting in June 2024, SECAS investigated this with Ofgem. Ofgem confirmed that Electricity Supply Licence Condition 39 details that for an installation to count towards targets, the Communications Hub must comply with a version of the CHTS which is within its Installation Validity Period on the day it is installed. Therefore, if upgraded to a compliant version on the same day as installation it can count towards targets. However, a Communications Hub that was installed whilst the valid TSAT date was expired would not count towards roll out targets.

Change Board vote

The Change Board voted to **reject** MP262 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	1	6	0	Reject
Small Suppliers	3	0	0	Approve
Network Parties	0	3	0	Reject
Other SEC Parties	0	2	0	Reject
Consumer Representative	0	0	0	-
Overall outcome:				Reject

The Consumer Representative was not present for the Change Board vote.

Views against the General SEC Objectives

Objective (a)²

Members of the Change Board who approved the implementation of this modification believed that MP262 will better facilitate SEC Objective (a)

Change Board discussions (July 2024)

The view of the Change Board is that MP262 will not facilitate SEC Objective (a). Members of the Change Board who voted to reject noted the recommendations from the Technical Architecture and Business Architecture Sub Committee (TABASC) not to extend the end dates when making their decision. It was also noted that having old Communications Hubs and firmware in the system would cause poor system performance.

² To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

The members who voted to approve noted that this would be a beneficial change, and that the previous three-month extension was insufficient. Therefore, they suggested this outweighed the TABASC recommendation.