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MP221

‘CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date’

Modification Report

Version 1.0

20 December 2022



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.

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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 full Refinement Consultation responses.

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1. Summary

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

The DCC has become aware of approximately 200,000 uninstalled Communications Hubs which are compliant with the Communications Hub Technical Specifications (CHTS) v1.0 and GB Companion Specification (GBCS) v1.1. The Technical Specification Applicability Tables (TSAT) contain an Installation End Date for CHTS v1.0 on GBCS v1.1 of 31 January 2023, and a Maintenance End Date of 28 February 2023. 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, incurring a financial and environmental cost.

The Proposed Solution is to extend 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.

This modification will impact Suppliers and the DCC. The costs of this proposal are limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort to implement the changes. There are no other costs associated with this change. If approved this change will be implemented in the February 2023 SEC Release and is being progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

The DCC has become aware of approximately 200,000 uninstalled Communications Hubs which are compliant with the SEC Schedule 10 'Communications Hub Technical Specifications' (CHTS) v1.0 and SEC Schedule 8 'GB Companion Specification' (GBCS) v1.1. The table titled "CHTS and Relevant Versions of GBCS" in SEC Schedule 11 'Technical Specification Applicability Tables' (TSAT) contains an Installation End Date for CHTS v1.0 on GBCS v1.1 of 31 January 2023, and a Maintenance End Date of 28 February 2023.

Such Communications Hubs have been successfully installed to date with a firmware upgrade taking place within one month of installation. The DCC considers that the installation of these remaining Communications Hubs should be allowed to continue for a short time longer in order to use up this remaining stock. It considers that the risk the firmware versions pose is minimal and, in any case, will be removed within one month of installation following an Over the Air (OTA) upgrade of these Devices.

What is the issue?

These dates in the TSAT 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, incurring a financial and environmental cost.

What is the impact this is having?

If the dates pass any remaining uninstalled stock will be non-compliant with the SEC and will need to be scrapped, incurring a financial and environmental cost.

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 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.

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 would otherwise need to be scrapped.

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 Schedule 11 'Technical Specification Applicability Tables' (TSAT)

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Technical specification versions

There are no changes directly to the Technical Specifications, only to their 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 v1.0 and GBCS v1.1 to continue to be installed and upgraded.

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

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is half a day of effort, amounting to approximately £300. 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

There will be no costs to SEC Parties as a result of this modification. This was confirmed during the Refinement Consultation.

6. Implementation approach

Approved implementation approach

The Change Sub-Committee (CSC) has agreed an implementation date of **one Working Day following decision**.

The first end date is on 31 January 2023. Since there are no scheduled releases before this date, this modification will need to be implemented as an ad-hoc release once a decision is received. If this modification is approved under Self-Governance, it will be implemented on the Working Day following the Change Board's vote. If that decision was subsequently appealed and overturned, the changes would then be backed out of the SEC.

7. Assessment of the proposal

Observations on the issue

The TSAT contains Installation Validity Period (IVP, from Installation Start Date to Installation End Date) and Maintenance Validity Period (MVP – from Maintenance Start Date to Maintenance End Date) dates for Devices in order 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 government 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 previous modifications to extend the 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.

The Installation End Dates and Maintenance End Dates were set to ensure older versions of Devices stop being produced in favour of newer, more advanced Devices being available. Whilst certain situations have led to delays in installing some of these older Devices there should be an end date where they can no longer be installed. Given the considerable number of extensions already, additional extensions should be given careful consideration.

Views of the Change Sub-Committee

When presenting to the CSC, a member requested that a more proactive approach should be taken towards end dates in the TS Applicability Tables. SECAS will actively track end dates to ensure that if a modification is required, it can be raised in sufficient time to allow for relevant discussions.

Views of the Security Sub-Committee

SECAS presented the modification to the Security Sub-Committee (SSC) to confirm that there are no security risks with extending the CHTS v1.1 Installation Validity Period and GBCS v1.0 Maintenance Validity Period by three months. The SSC confirmed that there are no concerns with the proposed extensions but queried if the Devices will be updated to newer versions of the Technical Specifications once installed. A member stated that this is out of scope of the modification, however it is the SSC's expectation that the Communications Hub will receive a firmware upgrade shortly after installation.

Solution development

Initial feedback from the TABASC Chair suggested that it was expected that 100,000 of the Communications Hubs in question were expected to be installed by the current Installation End Date and considered that it should only require an extra three months to install the last 100,000. SECAS and the TABASC Chair agreed that it was inappropriate to keep extending the Installation End Dates and Maintenance End Dates. They have been extended significantly due to the reasons stated above but this should not be continued. They therefore considered this should be the final extension that should be progressed for the CHTS v1.0/GBCS v1.1 combination.

Other ad-hoc feedback provided by the DCC to SECAS was that smaller Suppliers may not be installing Communications Hubs at a sufficient rate to install the remaining Communications Hub in three months. However, no Small Supplier comments were received during the Refinement Process.

SECAS considered that the OPSG would be interested and that the OPSG should also be used to remind Suppliers that these Communications Hubs will shortly be non-compliant and therefore should be installed first of any stock held by Suppliers. An item was presented on 8 November 2022, where the DCC noted that there are 192,000 uninstalled Communications Hubs on CHTS version 1.0. The OPSG noted that 94,000 of these CHs are with Suppliers who are not on the Smart Metering

Design Group (SMDG). The DCC stated that it is engaging with these Suppliers to identify stock within their supply chain that is on CHTS version 1.0. The OPSG was concerned with the potential associated costs, relating to returns and Communications Hub storage costs.

The DCC noted that it has raised this modification to change the TSAT dates. The OPSG highlighted the DCC would need to consider the cost, benefits, and implications of the end-of-life date during the SEC Modification process.

Existing Communications Hub stock

During Working Group discussions, a member noted that installation rates for the older Communications Hubs were low and asked if there were any plans to refurbish the existing older stock. The DCC stated that it would investigate to see if refurbishment is possible, although this is likely to be out of this modification's scope. Another member supported the extension of the IVP and MVP, as it will provide sufficient time to install the remaining stock. The Working Group commented that there have been similar conversations in the past and questioned if there needs to be a new approach to the issue to prevent it from reoccurring. SECAS acknowledges that this issue has been raised more than once. However, SECAS advised that there had been previous issues with Communications Hub firmware releases being delayed and that the Covid-19 pandemic resulted in a reduced amount of smart meter installations.

End date extension rationale

The Working Group queried the rationale behind the setting of the IVP and MVP end dates, who sets them, and if they were suitable. SECAS agreed to investigate and report back to the Working Group but noted that this is outside of the scope of this modification. SECAS asked the Working Group if it believed that the three-month extension was acceptable. The Working Group agreed with the Proposed Solution.

8. Case for change

Business case

Extending the Installation End Date and Maintenance End Dates by three months will present little security risk and allow the remaining stock to be installed and prevent them being scrapped. This will avoid financial and environmental costs.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification better facilitates SEC Objective (a)¹ as it will prevent Communications Hubs being scrapped and will help to better facilitate the efficient provision and installation of smart metering systems.

Industry views

The Refinement Consultation respondent stated that the modification will better facilitate the SEC Objectives without specifying which objective.

Views against the consumer areas

Improved safety and reliability

This modification will have no impact on this area.

Lower bills than would otherwise be the case

This modification will have no impact on this area.

Reduced environmental damage

This modification will reduce the chance of Devices becoming non-compliant and being scrapped.

Improved quality of service

This modification will have no impact on this area.

Benefits for society as a whole

This modification will have no impact on this area.

Final conclusions

There are no costs to implement this modification and extending the Installation and Maintenance End Dates will allow remaining Devices to be installed rather than becoming non-compliant and being scrapped.

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

Appendix 1: Progression timetable

Following the CSC's agreement that this modification should progress to the Report Phase, SECAS will issue the Modification Report Consultation before presenting the modification to the Change Board for decision under Self-Governance.

Timetable	
Event/Action	Date
Draft Proposal raised	7 Nov 2022
Presented to CSC for progression to the Refinement Process	15 Nov 2022
CSC converts Draft Proposal to Modification Proposal	15 Nov 2022
Modification discussed with Sub-Committees	Nov-Dec 2022
Refinement Consultation	15 Nov – 7 Dec 2022
Modification discussed with Working Group	7 Dec 2022
<i>Modification Report approved by CSC</i>	<i>20 Dec 2022</i>
<i>Modification Report Consultation</i>	<i>20 Dec 2022 – 13 Jan 2023</i>
<i>Change Board Vote</i>	<i>25 Jan 2023</i>

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
DCC	Data Communications Company
GBCS	Great Britain Companion Specifications
OPSG	Operations Group
OTA	Over The Air
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMDG	Smart Metering Design Group
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 Table