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MP230 ‘Review the SLA of SMETS1 firmware’ Annex C Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP230 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	The issue being that the processing cannot be complete within the SLA, however this does not benefit us as Suppliers will be told when they can send bulk firmware. There will be no change in processing large volumes of firmware OTAs for SMETS1 E&A.	-
EDF	Large Supplier	Yes	This solution appears to solve the issue of large firmware image size preventing the processing from taking place within 5 days. However, address the underlying issue of not being able to process them within a reasonable timescale at scale.	-
Octopus Energy	Large Supplier	Yes	The change being proposed is a minor one and allows for clearer defined processes for SMETS1 firmware upgrades.	-
E.ON	Large Supplier	No	See rationale in Question 4	-
British Gas	Large Supplier	No	Simply removing the 5 day SLA for larger firmware image updates is not sufficient. There needs to be a SLA of some sort for these larger images, even if it is 10-15 days for example.	Once a Supplier has contacted the DCC Service Desk and agreed the submission arrangement with the DCC, the SLA will remain 5 days from the point of submission of each batch.

Question 2: Do you agree that the legal text will deliver MP230?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	-	-	-
EDF	Large Supplier	Yes	The legal text appears to make the necessary changes to deliver the proposed.	-
Octopus Energy	Large Supplier	Yes	The legal text appropriately delivers an exemption on SLA for FW images over 750kB sent in batches of 12,000 or more, as highlighted by MP230.	-
E.ON	Large Supplier	No	-	-
British Gas	Large Supplier	No	The proposed legal text doesn't seem to match the "Proposed Solution" (on page 3 of the modification report). The "Proposed Solution" in the modification report says that the TRT wouldn't apply when a firmware image exceeds 750kB. But the proposed legal text says the firmware image has to exceed 750kB AND be in a batch of >12k for the TRT not to apply. Also, the batch >12k statement only says "more than 12,000 images at a time". How far apart must batches be in time? For example, is it OK for a User to send 11,500 images on Day 1, and then a further 11,500 each on Days 2 & 3. What about if the User sent 11,500 at 9am on Day 1, and then a further 11,500 at 9.30am?	The legal text and Proposed Solution section of the modification now align and advise that the 5 day SLA will remain if the batch size is pre agreed with the DCC. The DCC have confirmed post Refinement Consultation that a Supplier must notify the DCC Service Desk if they intend to send firmware images over of 750kB batched in increments of greater than 500 per day. This is due to the maximum threshold per day of processing larger firmware images is 12,000 images. So for the example that you provide 'a User to send 11,500 images on Day 1, and

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
				then a further 11,500 each on Days 2 & 3.' This is not permissible. 'the User sent 11,500 at 9am on Day 1, and then a further 11,500 at 9.30am' in this instance the User must contact the DCC Service Desk to agree on a batch size when a batch size is larger than 500 images and include images larger than 750kB.

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	This seems to be the only option that we have.	-
EDF	Large Supplier	Yes	The timeframes for implementation are reasonable.	-
Octopus Energy	Large Supplier	Yes	The suggestion of still being able to meet the obligation of 5-day TRT when the batch size is under 12,000 is welcomed and the removal of the TRT for larger batches allows DCC to remain within its service agreements.	-
E.ON	Large Supplier	No	See rationale in Question 4.	-
British Gas	Large Supplier	No	See comments above.	-

Question 4: Do you agree that the proposed solution, which involves setting a specific circumstance to extend the processing time for large firmware images, will effectively resolve the identified issue?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Again, being that the issue identified is around not reaching SLA's, however the overall issue is still there, in terms of the image size being too large. We must stress that we do not wish to encourage DCC to not attempt to meet the current SLA as it stands by supporting this modification, but we understand that if that is not possible then the SEC should be amended.	-
EDF	Large Supplier	Yes	As mentioned in response to Question 1 – Yes, it will prevent the issue failing due to the size being too great to process in 5 days. It does not address the underlying issue of being unable to process the size of updates required within 5 days. Given this modification is to address SMETS1 firmware updates, this will hopefully be an issue that diminishes over time and will act as a workaround for as long as one is required.	-
Octopus Energy	Large Supplier	Yes	The issue identified is that DCC cannot guarantee to meet the 5-day timeframe for large firmware images in large batches. The proposal to allow a specific.	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			circumstance (over 12,000 devices in a batch and FW image size over 750kB) whereby DCC will not be held to 5 days seems reasonable. This is effectively confirming what we already do in legal text/documentation.	
E.ON	Large Supplier	No	The proposal is not clear whether the proposed limit of 12,000 SMETS1 firmware deployments where the file size exceeds 750KB a day, is across all suppliers or if a limit is to be imposed for each supplier. If this is the limit which applies across all suppliers it would create a significant impact on firmware campaigns particularly where the supplier has a significantly large SMETS1 fleet that requires an upgrade. The DCC have stated that there are around 600k SMETS1 devices that have a large firmware file. E.ON has a significant number of SMETS1 devices which have a large firmware file It is likely other suppliers will have significant volumes of SMETS1 assets that require an upgrade whose file size image will exceed 750k. How have the DCC arrived at these numbers? When the systems were built to support activities such as firmware deployments, it would have been known that some SMETS1 firmware images would exceed 750k. Why was the file size requirement not factored in?	The DCC have confirmed that it can handle a combined total of 12,000 firmware images at 750kB per day from Suppliers. (If one Supplier submits a batch of 12,000 then other Suppliers cannot) The DCC arrived at 750kB as there is one Device Manufacturer who has a firmware image size greater than 750kB for which it is unable to meet the five day SLA. The DCC have advised that it only discovered the problem associated with very large firmware image sizes when SMETS1 Devices were migrated onto the DCC Network. The DCC had no prior knowledge of, or control of firmware image

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			With other suppliers still to complete SMETS1 E&A the increased need for firmware upgrades to those assets post enrolment may also have an impact on thresholds. How will these be handled by the DCC?	sized, as this is purely down to the Meter Manufacturer. The DCC have confirmed there is no impact on thresholds and any post enrolment would be handled in the same way as the updates specified in the modification report. Meaning any Parties intending to send large firmware images over 750kB in size who intend to send more than 500 firmware updates should contact the DCC to arrange the schedule for the updates. The DCC will be able to handle firmware upgrades via the DCC Service Desk.
British Gas	Large Supplier	No	We understand the rationale, but we still have concerns – see answers to Questions 1 and 2 above.	-

Question 5: Will there be any impact on your organisation to implement MP230?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No	As this modification is not addressing the root cause.	-
EDF	Large Supplier	Yes	As part of our current process for firmware updates, we send the 11.1 download request 7 days before we send the 11.3 activate firmware SR. If the DCC takes more than 7 days to process the 11.1 then we will send the activates too early and they will fail. We would therefore need to amend our process in the event in image takes longer than 7 days to process.	The SLA will remain at 5 days from the point an agreed batch is submitted to the DCC.
Octopus Energy	Large Supplier	No	MP230 will have no impact on our organisation.	-
E.ON	Large Supplier	Yes	If the 12,000 limit is imposed across all suppliers, the impact on any SMETS1 firmware deployment whose files exceed the 750k would be significant as any critical upgrade would take considerably longer to complete and prolong the customer impact. This would occur, not only at the initial rollout, but also once mass OTA has been completed, as any retries would also be delayed. Having the proposed set limit would mean that all suppliers would potentially need to agree on a daily limit for any deployments between themselves, potentially creating unnecessary impact to the customer base.	The DCC have confirmed that it can handle a combined total of 12,000 firmware images at 750kB from all Suppliers per day.

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			How does the DCC propose to handle deployments across multiple suppliers (DCC Users) and asset variants? E.ON may have SMETS1 deployments to multiple asset variants at the same time, all of which are critical updates.	
British Gas	Large Supplier	Yes	If the solution involves us discussing with DCC in advance of any large firmware rollout, then we will need to change some processes slightly.	-

Question 6: Will your organisation incur any costs in implementing MP230?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No costs	-	-
EDF	Large Supplier	No costs	There are no meaningful costs associated with implementing this change	-
Octopus Energy	Large Supplier	No	This raises no changes to us as a supplier so there is no cost involved from our perspective	-
E.ON	Large Supplier	No	The solution proposed by the DCC to limit the number of SMETS1 firmware deployments where the file size is over 750K to 12,000 per day would have a significant impact on E.ON's ability to deploy firmware to its customer base, especially at times when we must upgrade our customer base as quickly as possible with a critical update or fix a security issue. There needs to be the ability to support larger deployments without having to constantly contact the DCC and ask for more bandwidth. What happens if all Suppliers were to roll out large sized file SMETS1 firmware upgrades at the same time?	Proposed solution is the most cost-effective outcome. The DCC have confirmed they can follow the new procedure set out in the modification to manage SMETS1 firmware upgrades as efficiently as possible. The DCC have confirmed that Suppliers intending to send over 500 firmware images over 750kB must contact the DCC Service Desk to arrange the schedule for the updates.
British Gas	Large Supplier	n/a	There will be an additional cost to us to put firmware into batches of <12,000.	-

Question 7: How long from the point of approval would your organisation need to implement MP230?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Immediately	-	-
EDF	Large Supplier	N/A	We would implement the changes to our process (as mentioned in Question 5) as a part of the first firmware update to be impacted.	-
Octopus Energy	Large Supplier	No time	The formal proposal of MP230 matches the activity we as a supplier have already been conducting with DCC to conduct larger SMETS1 firmware.	-
E.ON	Large Supplier	Not known	-	-
British Gas	Large Supplier	n/a	n/a	-

Question 8: Do you believe MP230 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	B	-
EDF	Large Supplier	Yes	This will better allow for the operation of Smart Meters – via improved firmware adherence – In line with General SEC Objectives.	-
Octopus Energy	Large Supplier	Yes	We believe that MP230 will better facilitate objectives A,B,C,G	-
E.ON	Large Supplier	No	See rational previously given.	-
British Gas	Large Supplier	Yes	For the first time in my experience of SEC change, the modification paper doesn't actually state which of the General SEC Objectives would be benefitted by this change in the Proposers view. This seems strange. In my view, it would support General SEC Objective (a) – to facilitate the efficient provision, installation and operation as well as interoperability of smart metering systems at Energy Consumer's premises within Great Britain, and potentially also General SEC Objective (b) – to enable the DCC to comply at all times with its licence.	The Modification Report has been updated.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP230 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	The potential for longer SLAs will result in firmware taking longer for suppliers to process.	-
EDF	Large Supplier	No	The change should have no impact on customers of note. Firmware updates are primarily operation in nature and impact industry to a greater extent.	-
Octopus Energy	Large Supplier	No	MP230 appears to formalise what has already been enacted between DCC and suppliers. It will likely have limited to impact on customers.	-
E.ON	Large Supplier	Yes	See rationale in Questions 5 and 6.	-
British Gas	Large Supplier	n/a	n/a	-

Question 10: Noting the costs and benefits of this modification, do you believe MP230 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Although there is not a beneficial change for Suppliers, we understand the need for compliance to be met. The cost is low and appreciate the cost to deliver a better solution would be far too costly but would like to stress that this is not addressing the overall issue. New SLA's will need to carefully be considered.	-
EDF	Large Supplier	Yes	We have no objections to the modification and agree with the rationale for its implementation.	-
Octopus Energy	Large Supplier	Yes	As there are minimal/no costs it should be implemented for greater clarity on SMETS1 firmware activity.	-
E.ON	Large Supplier	No	See rationale previously given.	-
British Gas	Large Supplier	No	Not in current format, although we agree that a solution is needed to ensure larger firmware images can be processed.	-

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Comments	SECAS Response
OVO	Large Supplier	None	-
EDF	Large Supplier	None	-
Octopus Energy	Large Supplier	Whilst we agree that this modification is necessary and sensible, we would like to highlight that MP242 is currently being discussed and this suggests removing the TRT/RTT as a mechanism for success. MP230 mentions a TRT so the legal wording will need to be reconsidered if/when MP242 is adopted and TRT's are discarded.	This will be considered as part of MP242.
E.ON	Large Supplier	None	-
British Gas	Large Supplier	Would the SSC agree with a modification to remove the SLA for larger firmware updates, when these were of a security issue? Would the SSC agree with a modification to remove the SLA for larger firmware updates, when these were of a security nature? We don't like the general principle of changing the goal posts if DCC is unable to deliver as required under licence. However, we recognise that the size of some of these firmware updates may have been reasonably unexpected. It is unclear whether the issue is one of volume, not image size. If batches were kept low (below the 12k threshold) and current SLAs retained, are there options for Service Credits if that is not met.	If an urgent security update is needed, a different process will be employed. The DCC has confirmed the images are compressed. The Modification Report has now been amended to show the five day SLA is still to be applied.

Question 11			
Respondent	Category	Comments	SECAS Response
		Are manufacturers looking at compressing the image on future releases? This could have a lot of benefits – it's complex to send more than one image anyway, regardless of the DCC transmission aspect. A compressed lower single image size could help considerably. We agree that the option of talking to DCC first before doing such updates seems sensible and a workable potential option. If we sent in batches under 12k would the SLA still apply? (The Modification report seems to say no, but the Legal text says yes.) However, it may be hard to police this from a SEC Ops perspective, because DCC would have to do lots of different reporting by batch sizes (some of which would be in SLA, and some not). The comment on page 6 of the Modification Report that the DCC is potentially just rejecting any Firmware update requests that it thinks would breach SLA is really worrying if it is correct. This just seems wrong. Surely that would be an automatic fail of SLA anyway?	