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MP230 ‘Review the SLA of SMETS1 firmware’

Annex E

Second Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP230 second Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Yes	It provides a very low cost solution which controls access to a limited resource
British Gas	Large Supplier	Yes	This does resolve the identified issue, but only with a solution that makes it difficult for suppliers

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

Question 2			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Yes	It details the manual flow control required to prevent overloading the DCC's SMETS1 firmware deployment environment
British Gas	Large Supplier	No	The legal text seems to be wrong, in several places, and doesn't align with the latest version of the modification report

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
E:ON	Large Supplier	Yes	The approach is low cost and straightforward and will only be needed until circa early 2029 after which the associated meters are due to have been replaced with SMETS2 meters	-
British Gas	Large Supplier	No	Requiring the suppliers to do the batching is going to be difficult. We will do our best, but this will be a manual one-off piece of work, that may be difficult to coordinate. Can we have clarity on what happens if we don't manage to batch correctly? Will the updates still go through, but maybe take 2x the SLA? I doubt we will be able to exactly get 500 per batch, with the way our systems work. We are hoping the required volumes in our estate aren't going to be too extensive.	Batches do not have to be 500 exactly. The batches have to include over 500 large firmware updates over 750kB. If all updates are requested in one go, there is a small risk that some may timeout but these could be retried as a new batch afterwards.

Question 4: Will there be any impact on your organisation to implement MP230?

Question 4			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Yes	Additional resources to implement the staging/batching of any SMETS1 firmware deployment that is captured by the new proposal
British Gas	Large Supplier	Yes	See answer to question 3

Question 5: Will your organisation incur any costs in implementing MP230?

Question 5			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Less than £100k	Additional resources to implement the staging/batching of any SMETS1 firmware deployment that is captured by the new proposal
British Gas	Large Supplier	Less than £100k	No specific costs, but the requirement on us to do any batching (rather than be able to pass across an agreed – say – single batch of 1500, which we agree can be treated as received over 3 consecutive days) will be complex to manage

Question 6: How long from the point of approval would your organisation need to implement MP230?

Question 6			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	It can be implemented immediately	EON has already been coordinating with the DCC on this topic for a considerable time
British Gas	Large Supplier	-	-

Question 7: Do you believe that MP230 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Yes	General SEC Objective (a) – to facilitate the efficient provision, installation and operation as well as interoperability of smart metering systems at Energy Consumers's premises within Great Britain
British Gas	Large Supplier	Yes	We agree it supports General SEC Objective (b)

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP230 is implemented?

Question 8			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	No	MP230 merely formalises what has already been happening and will have limited impact on customers
British Gas	Large Supplier	-	-

Question 9: Noting the costs and benefits of this modification, do you believe MP230 should be approved?

Question 9			
Respondent	Category	Response	Rationale
E:ON	Large Supplier	Yes	At very low cost, it ekes out the DCC resources for SMETS1 firmware deployments until the SMETS1 meters with large firmware images are replaced
British Gas	Large Supplier	Yes	We are not happy with it, but recognise it needs to be approved

Question 10: Please provide any further comments you may have.

Question 10			
Respondent	Category	Comments	SECAS Response
E.ON	Large Supplier	E.ON are aware that DCC is in the process of re-procuring specific SMETS1 services during 2024/25. Options to address DCC system constraints that impose the operational limit on firmware deployments should be considered during this procurement work. The DCC should not assume that SMETS1 systems should only scale downwards ahead of the SMETS1 end of life dates	Re-procurement is not at a stage where the DCC can assess the infrastructure. With a cloud based solution there may be some flex capability to enable short term capacity increases for firmware events but the type of solution hasn't yet been determined. Baseline traffic scaling is determined by the formal forecasts and are validated by observed actuals. Capacity scaling is then in response to these forecasts. Firmware timings and batch sizes are set with respect to the shapes and volume baseline traffic.
British Gas	Large Supplier	-	-