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MP252 ‘Amending the process for Communications Hub returns’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP252 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	See Q10	-
E.ON	Large Supplier	Yes	E.ON's preferred solution is option A. Though both options will work, option A is the cleaner approach with less ongoing costs and complexity for E.ON. Option B will cause the handling of assets multiple times and ongoing storage/logistics costs, this is due to assets needing to be held in separate boxes and locations awaiting decommissioning before they can be processed and returned.
Octopus Energy	Large Supplier	Yes	The solutions proposed both allow any party to return CHF's to the DCC. This allows for an easier returns process and will reduce the volume of CHF's which remain in warehouses unable to be processed.

Question 2: Do you agree with the proposed implementation approach?

Question 2			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	See Q10	-
E.ON	Large Supplier	No	Timescales to implement appear significant, E.ON believes these need to be shortened to realise the benefits at a much faster pace and could conceivably support the transition from 2g-4g comms hubs.
Octopus Energy	Large Supplier	Yes	Either Options would appropriately handle issues outlined. It appears that Option A is more expensive but less reliant on DCC user input, where Option B carries a lower cost but more input from DCC users.

Question 3: Will there be any impact on your organisation to implement MP252?

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	A small amount of additional resource will be required to support the new process on an ongoing basis. Our view is option A is the simplest solution, this option is only a slight change to our current process. Going with this option will reduce disruption and the amount of on-going additional resource required when compared to option B.
Octopus Energy	Large Supplier	Minimal	We believe this is more of an issue for MOP's rather than suppliers. There is the potential that this activity will improve the data quality around removed CHF's which stands to bring benefits to all DCC users.

Question 4: Will your organisation incur any costs in implementing MP252?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Less than £100k	Assuming no system changes our side, and the new process is run in parallel to the existing process we do not foresee any development costs. The costs that will be incurred are FTE with E.ON needing staff to carry out the activity, we believe option B will have greater ongoing costs compared to option A. If option A is implemented, we see a very slight increase in activity that could be absorbed by our current workforce. If option B is implemented, we estimate the impact to be about ½ an FTE and an additional £60 per month in logistics fees. This estimate is with current return volumes, with 4g hubs around the corner and 2g/3g sunsetting we expect this will increase in the future.
Octopus Energy	Large Supplier	Yes	Solution Option A will have minimal incurred costs as the burden to sort and decommission the devices is on DSP which means

Question 5: How long from the point of approval would your organisation need to implement MP252?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	0-1 week	Assuming this is only a change to process and no internal system development is required, the time to implement for E.ON would be: Option A – Within a day, as there is only a slight change to our existing process we could set this up almost immediately. Option B – 1 week, we would need to implement changes with our logistics partner and changes to internal processes.
Octopus Energy	Large Supplier	Minimal time	The time to implement would vary depending on Option A or Option B however we feel confident that given the proposed timelines any changes could be made in advance of the given dates.

Question 6: Do you believe that MP252 would better facilitate the General SEC Objectives?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	We feel this change will feed into the SEC Objective to facilitate the efficient provision, along with the SEC Objective to facilitate the efficient and transparent administration and implementation of this Code.
Octopus Energy	Large Supplier	Yes	This proposal supports various SEC objectives: (A) the efficient operation and interoperability of smart metering systems, (D) by enabling effective competition between parties and (G) making the implementation of the code more efficient.

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP252 is implemented?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	Once an efficient process is established this could lead to less costs incurred across the industry, potentially leading to lower operational costs and lower costs passed through to the consumer.
Octopus Energy	Large Supplier	Yes	There is a cost associated with either Solution option A or B which will ultimately be borne by customers. There is a potential for SECMP252 to bring improvements in the smart meter data quality around CHFs which if acted upon by DCC users offers improvements to customer experience.

Question 8: Noting the costs and benefits of this modification, do you believe MP252 should be approved?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	E.ON agree in principle however more details around costing are required before a formal decision can be made.	We believe this will be off benefit to us and the industry, solving a known issue and should lead to an improved process with a reduction in operational costs. It is difficult to quantify the full benefit as insufficient detail around DCC costing has been provided, this impacts the benefits analysis. DCC needs to be providing its full cost range as soon as possible including estimates for SIT, UIT, implementation and support costs.
Octopus Energy	Large Supplier	Yes	This will allow for the return of CHF's where the responsible supplier cannot be identified. This will improve data integrity with returned CHF's being more easily decommissioned or marked as returned; it will also reduce storage necessity for these Hubs which currently have no known returns journey due to inability to identify responsible supplier.

Question 9: Noting the draft DCC Alternative Returns for Communications Hubs Guidance document in Annex C, do you agree with how the DCC plans to determine a removal date of each of the Communications Hubs, and correct charges retrospectively?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
E.ON	Large Supplier	More information required	The potential period between "Deemed Removal Date" and the date the CH is returned to the DCC could in many cases be an inaccurate or inappropriate measure. This time difference could be lengthy, especially where the customer prevents or delays access to site. If the loss of communications is due to a Comms Hub fault or WAN coverage issue under the control of the DCC or its service providers, it's unclear why the "Responsible Party at Removal" should be receiving the re-allocated or the additional costs. We would like to understand what if any other alternative options have been considered and are available for review.	More details of how the "Deemed Removal Date" and allocation of costs will be provided by the DCC as part of the DCC Impact Assessment. In addition, the DCC Alternative Returns for Communications Hubs Guidance document will also be updated to provide more clarity to SEC Parties.
Octopus Energy	Large Supplier	Yes	We agree with the proposal to use the last communicated date as the Deemed Removal Date. The proposed mechanism seems fair to ensure the responsible party at point of removal is charged for this.	-

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

Question 10			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	We are confused by some of the detail on this modification, but have the following comments: The cost of Option A (especially the reference to extensive regression testing and integration testing in addition to the £860k - £1m cost estimate) is worrying, and so is the longer delivery time, especially as this takes the modification past November 2025, which leads to greater uncertainty around DSP re-procurement. On this basis, we would prefer Option B. We also note that in the September 2024 working group, it was said that the Option A £860k - £1m cost was still being finalised, and was <i>likely to increase further</i>. Is this likely further increase linked just to 4G, or are there other reasons behind this expected increase? The DCC has estimated that 65,000 CHs are currently not on the wall, but not with the Responsible Supplier. Does the DCC have details on how these 65,000 are split by Responsible Supplier. (For example, we know how many such assets we have in our possession, where we are not the Responsible Supplier, but we don't know how many are held incorrectly by others, where we <i>are</i> the Responsible Supplier.) Whilst we realise the GDPR constraints prevent the DCC from sharing details on individual meters, we are not clear why it is not possible for the holding party to advertise details of the meters, for the	For the increased costs above what was quoted in the Preliminary Assessment for Option A, the DCC noted it was not only the 4G addition which would increase it. They had other factors but did not disclose what they were nor provide SECAS with an updated cost range as yet. The DCC is unable to reveal to the party in possession of, who the Responsible Supplier is for the Communication Hubs they hold, due to confidentiality clauses in SEC Section M 'General'. As for advertising the Communication Hubs details, the DCC noted they have tried to contact Responsible Suppliers for Communication Hubs not in their possession, but were told by the Responsible Suppliers they would not do anything unless they physically had possession of the Communication Hub. Therefore, if the DCC advised the party in possession where to send the Communication Hubs, they would be in breach of the confidentiality clauses in SEC

Question 10			
Respondent	Category	Comments	SECAS Response
		Responsible Supplier(s) to then recognise their assets. Can you explain why an advertising solution isn't possible?	Section M 'General'. Also to note the increased carbon footprint by sending these Communication Hubs between Parties.
E.ON	Large Supplier	In the modification documents there is no mention of the return SR's - 8.14.3 / 8.14.4. Would there still be a requirement for these SR's to be sent prior to return?	The DCC noted in Solution Options A and C, that there will be the need for SEC Parties to send SRVs 8.14.4 and 8.14.4 where possible. For CHs where the Party in Possession is not the Responsible Supplier, therefore unable to send the SRVs, the SEC Party is to include the CHs into the returning pallet, so DCC/CSPs processed them upon physical receipt of the CHs.
Octopus Energy	Large Supplier	The timelines and costs associated with the two options proposed seem to lead respondents to opt for Option B as it is suggested to be significantly cheaper and faster to implement. There is discussion about the charging mechanism as part of this MP and how the charges should be levied. We have raised previously that the current charging mechanism is not clear on how charges are levied to DCC users. The monthly invoices and charging mechanism are not clear meaning it is not obvious where the savings will always be made in such proposals. We do not believe this should prevent the approval of MP252 but wish to mention this.	More details of charges levied will be provided by the DCC as part of the DCC Impact Assessment. In addition, the DCC Alternative Returns for Communications Hubs Guidance document will also be updated to provide more clarity to SEC Parties.