

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.



MP252

‘Amending the process for Communications Hub returns’

Modification Report

Version 1.0

29 January 2025



About this document

This document is a Modification Report. It sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions.

Contents

1.	Summary	3
2.	Issue	4
3.	Solution	7
4.	Impacts	11
5.	Costs	13
6.	Implementation approach	14
7.	Assessment of the proposal	14
8.	Case for change	20
	Appendix 1: Progression timetable	21
	Appendix 2: Glossary	22

This document also has six annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex C** contains the draft DCC Alternative Returns for Communications Hubs Guidance document.
- **Annex D** contains the full responses received to the Refinement Consultation.
- **Annex E** contains the MP252 DCC Full End to End costs (including SEC Release regression testing).
- **Annex F** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

Contact

If you have any questions on this modification, please contact:

Elizabeth Woods

020 4566 8335

elizabeth.woods@gemserv.com

1. Summary

This proposal has been raised by David Lane from Smart Metering Systems (SMS) PLC.

Smart Energy Code (SEC) Section F 'Smart Metering System Requirements' and Appendix I 'CH Installation and Maintenance Support Materials' details the requirements enabling Parties to return Communications Hubs. This can either occur where a problem is identified prior to its installation or after installation and subsequent removal. To return a Communications Hub, the Party must send a Service Reference Variant (SRV) for each Communications Hub they want to return to the DCC.

The DCC has identified over 65,000 Communications Hubs which are 'not on the wall' and are in the possession of non-Responsible Parties. Where the Party in possession is not the Responsible Supplier, the Party are unable to decommission the Communications Hub or identify the Responsible Supplier.

At the DCC Returns Workshop in July 2023 and the DCC Supply Chain Working Group in December 2023, the DCC received feedback from industry of issues within the whole process. There was agreement amongst attendees that the current process does not work well and is inefficient, with attendees noting there have been many issues raised over the last few years in various forums. Attendees felt there was a need for a 'fit for purpose' process to address these issues both now and for future volumes of Communications Hub returns.

The Communications Hubs in the Proposers (and other non-responsible Parties) possession are taking up space in their warehouses and incurring ever increasing storage costs. The Proposer also noted that where they are unable to meet the 90-day Service Level Agreement (SLA) to return the Communications Hub following decommission, there is a financial impact for the Party in possession of the Communications Hub, the Responsible Supplier and indirectly, consumers.

The Proposer also highlighted that the volume of Communications Hubs will continue to increase and likely at an accelerated rate once 4G Communications Hubs are rolled out (currently expected to commence in July 2025).

The Proposed Solution will allow any SEC Party to return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) with additional validation. This will provide three possible routes for the Communications Hub return records to be created in DSMS. There will be a new DUIS error code associated with SRVs 8.14.3 and 8.14.4, which will require DCC Users to move to the new version of DUIS. DCC Users not on this new version of DUIS will get an overloaded or existing error.

This modification will impact all SEC Parties and the DCC. The cost of implementation for the Proposed Solution is £329,626 with a first year operating charge of £24,563. If approved, this modification is targeted for the November 2025 SEC Release and will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

A Communications Hub is a physical Device that includes a Communications Hub Function (CHF) together with a Gas Proxy Function (GPF) that is used to connect a Smart Meter with the DCC System. Each Communications Hub remains the property of the DCC, and the Responsible Supplier is charged with a rental fee for each one. This rental fee is triggered upon the point of delivery and remains whether the Communications Hub is installed at a property; being held in storage prior to installation; or after removal but before returned to the DCC. Upon return of each Communications Hub to the DCC, there is a one-time charge levied on the Responsible Supplier, dependant on if the Communications Hub returned can be redeployed or not.

The DCC provides a returns process for Communications Hubs. The aim being that these can be triaged, refurbished and reissued. The Communications Hub can either be returned without ever being installed at a property or following a removal. To return a Communications Hub, the Party must send an individual SRV for each Communications Hub they want to return to the DCC¹. Clauses 9 and 10 of SEC Appendix I outline how a Communications Hub should be removed, how to notify the DCC of its impending return and how to return the Communications Hub. Currently two key conditions must be met:

1. The SRV requesting return must originate from the Supplier who is responsible for the Communications Hub; and
2. The Communications Hub status must be either 'Decommissioned' if it has been installed previously or returned prior to installation.

Alternatively, if a Party is not able to submit an SRV in accordance with SEC Appendix I clauses 9.4, 9.5, 9.6, 9.7 or 9.8, that Party shall contact the DCC Service Desk.

The SRVs associated with Communications Hub returns are outlined in SEC Appendix AD 'DCC User Interface Schedule' (DUIS). They are SRV 8.14.3 (CommsHubStatusUpdate-FaultReturn) and SRV 8.14.4 (CommsHubStatusUpdate-NoFaultReturn). The criteria state that the only Eligible Users are Import Suppliers, Gas Suppliers and Registered Supplier Agents (RSA).

What is the issue?

The Proposer, who is a Meter Operator (MOP), has accumulated over 20,000 Communications Hubs over time, which have ended up in their possession through incorrect removal procedures and not in the status of decommissioned on the Smart Metering Inventory (SMI). As the Proposer is not the Responsible Supplier, they are unable to decommission the Communications Hub nor identify the Responsible Supplier due to the confidentiality clauses in SEC Section M 'General' as follows:

M4. CONFIDENTIALITY

Prohibition on disclosure and use by DCC

M4.1 Subject to Sections M4.3 and M4.4, the DCC shall not disclose another Party's Confidential Information to, or authorise access to another Party's Confidential Information by, any person.

¹ Some organisations have an internal method of sending bulk return requested to the DCC.

M4.2 Subject to Section M4.3, the DCC shall not use a Party's Confidential Information for any purpose other than the purpose for which it was provided (or otherwise made available) to the DCC, and in any event for any purpose other than the purposes of this Code

The ownership of a Communications Hub would fall into that definition of Confidential Information, which the DCC is therefore precluded from disclosing. The SEC would need to be amended to provide the DCC with the authority to provide this information to other parties.

Due to the Party in possession of the Communications Hubs being unable to update the details to the DCC, these Communications Hubs are unable to undergo triage, refurbishment, redeployment, or secure disposal. This also has resulted in incorrect charges being placed on Suppliers for Communications Hubs which are no longer at a consumer's premises, nor in the Supplier's possession. Communications Hub rental charges are ongoing until a Communications Hub is returned to the DCC. When a Communications Hub is returned to the DCC, there is a one-time charge for any Communications Hub returned and redeployed or returned and not redeployed. A number of these Communications Hubs have been subject to rental charges for a long period of time, whereby if they were returned at the point of removal, the Responsible Supplier may have made some savings compared to the ongoing rental charges. A further complication is that due to the age of some of these stranded Communications Hubs, the current Responsible Supplier may not be the Party who was the Supplier when the Communications Hub was incorrectly removed due to consumers switching Suppliers.

The Proposer has found the Communications Hub removal and returns process overly complicated and resource heavy. This holds challenges for Parties to follow efficiently and allow for Devices to be returned within the timeline stated in the SEC Appendix I 'CH Installation and Maintenance Support Materials' as follows:

10. COMMUNICATIONS HUB RETURNS

10.1 Where a Supplier Party has handed back a Special Installation Mesh Communications Hub to the DCC whilst in attendance at the relevant premises and where the Special Installation Mesh Communications Hub had been installed at a previous installation visit, the Party shall submit Service Request 8.14.3 (Communications Hub Status Update – Fault Return) or Service Request 8.14.4 (Communications Hub Status Update – No Fault Return) in respect of the Communications Hub returned in accordance with DUIS within three (3) Working Days.

Delivery of Returns

10. 11 Where the Party does not return a Communications Hub within 90 days pursuant to Section F8.6 of the Code, the Communications Hub shall be deemed to be lost or stolen and the DCC shall prevent that Communications Hub from connecting to the Smart Metering Wide Area Network (SM WAN).

As referenced in SEC Section F 'Smart Metering System Requirements' as follows:

F8. REMOVAL AND RETURN OF SMETS2+ COMMUNICATIONS HUBS

Return of Communications Hubs

F8.6 Where a Communications Hub is removed by a Supplier Party from a premises at which it was previously installed, the Supplier Party shall return the Communications Hub to the DCC within 90 days after the date of its removal. This obligation to return a Communications Hub only applies where the Communications Hub Function which forms part of that Communications Hub has at any time had an SMI Status of 'installed not commissioned' or 'commissioned'.

These sections and clauses constitute a 90-day SLA to return the Communications Hub following decommission, and a three-day SLA between decommission and return request SRV sent.

Based on the above, the main issues the Proposer would like to explore further as part of this modification are as follows:

- Inability to Identify current Communications Hub's Responsible Party and no current process for Non-Responsible Party to return Communications Hub to CSP. Non-Responsible Parties unable to send secure SRV 8.3 'DecommissionDevice' before sending SR8.14.3 'CommsHubStatusUpdate-FaultReturn' and SR 8.14.4 'CommsHubStatusUpdate-NoFaultReturn' for Communications Hubs to be returned.
- No process to return Communications Hubs where a Change of Supplier process has failed to change the Responsible Party or a current Supplier fails to 'Decommissioned' at point of Communications Hubs removal and subsequently, the Consumer proceeds with a Change of Supplier.
- SEC Parties unable to meet the 90 Day SLA from when SRV 8.3 'DecommissionDevice' and SR8.14.3 'CommsHubStatusUpdate-FaultReturn' or SR 8.14.4 'CommsHubStatusUpdate-NoFaultReturn' is sent until the Communications Hub is returned to CSP.
- The current manual process for the DCC and SEC Parties to validate each Communications Hub return request, adding time delays to the process which prevents unsolicited Communications Hub returns being sent to the CSP.
- With current Communications Hub returns process being laborious, this has limited the volume of Communications Hub returns which can be processed by the CSP.
- Lack of near real time reporting mechanism to monitor Communications Hubs returns data.

What is the impact this is having?

The Proposer has over 20,000 Communications Hubs in their possession, taking up space in their warehouses and incurring ever increasing storage costs. The DCC has noted they are aware of over 65,000 Communications Hubs which are not 'on the wall' and are with non-Responsible Parties. These Communications Hubs will also be the cause of ongoing rental charges to the Responsible Supplier until they're returned. The Proposer also noted that where they are unable to meet SLA, there is a financial impact for the Party in possession of the Communications Hub, the Responsible Supplier and indirectly, consumers. The Proposer believes that if the rules are relaxed or an alternative returns route can be found, the Communications Hubs could undergo triage, redeployment, refurbishment or secure disposal.

The Proposer also noted that the volume of Communications Hubs will continue to increase and at an accelerated rate once installation of 4G Communications Hubs begins.

Impact on consumers

There is an indirect impact on all consumers, as this would mean costs associated with Communications Hubs are allocated correctly to SEC Parties. It would also ensure uninstalled or removed Communications Hubs are able to undergo triage, redeployment, refurbishment or secure disposal. This would reduce the number of new Communications Hubs that need to be manufactured which should result in cost saving for industry, which is passed onto consumers.

3. Solution

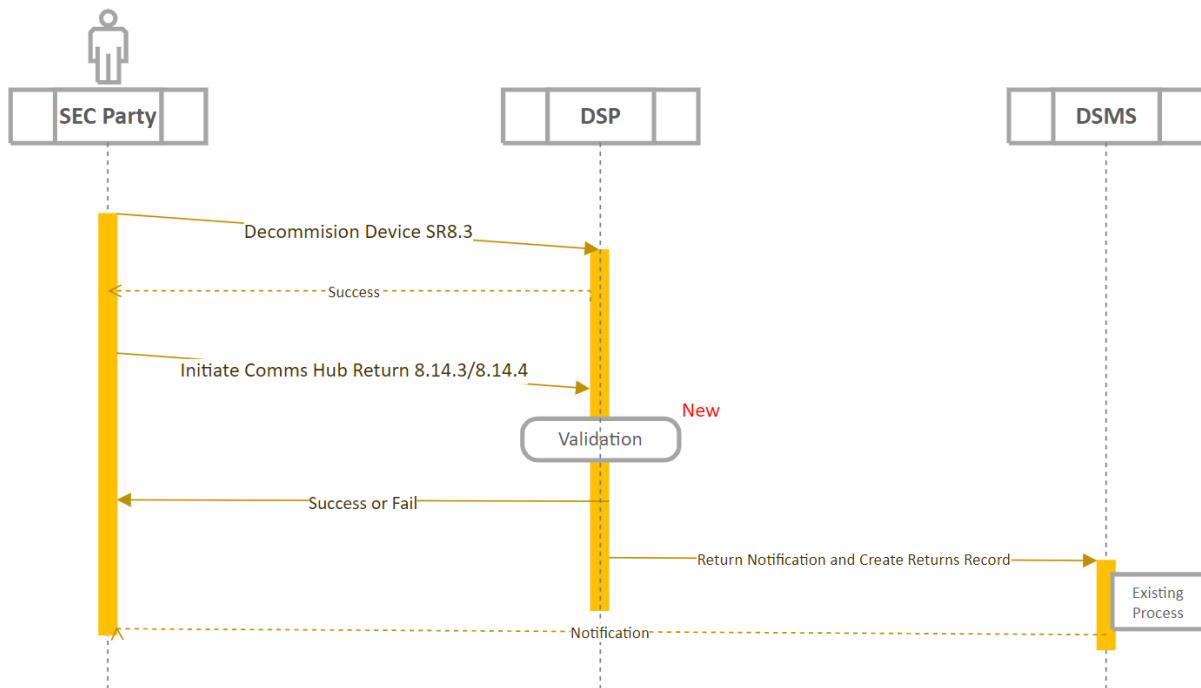
Proposed Solution

The Proposed Solutions will allow any SEC Party to return Communications Hubs to the DCC.

SEC Parties should return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) with additional validation. This will provide three possible routes for the Communications Hub return record to be created in DSMS. There will be a new DUIS error code associated with SRVs 8.14.3 and 8.14.4, which will require DCC Users to move to the new version of DUIS. DCC Users not on new version of DUIS will get an overloaded or existing error.

The three possible routes are detailed in the below Use Cases:

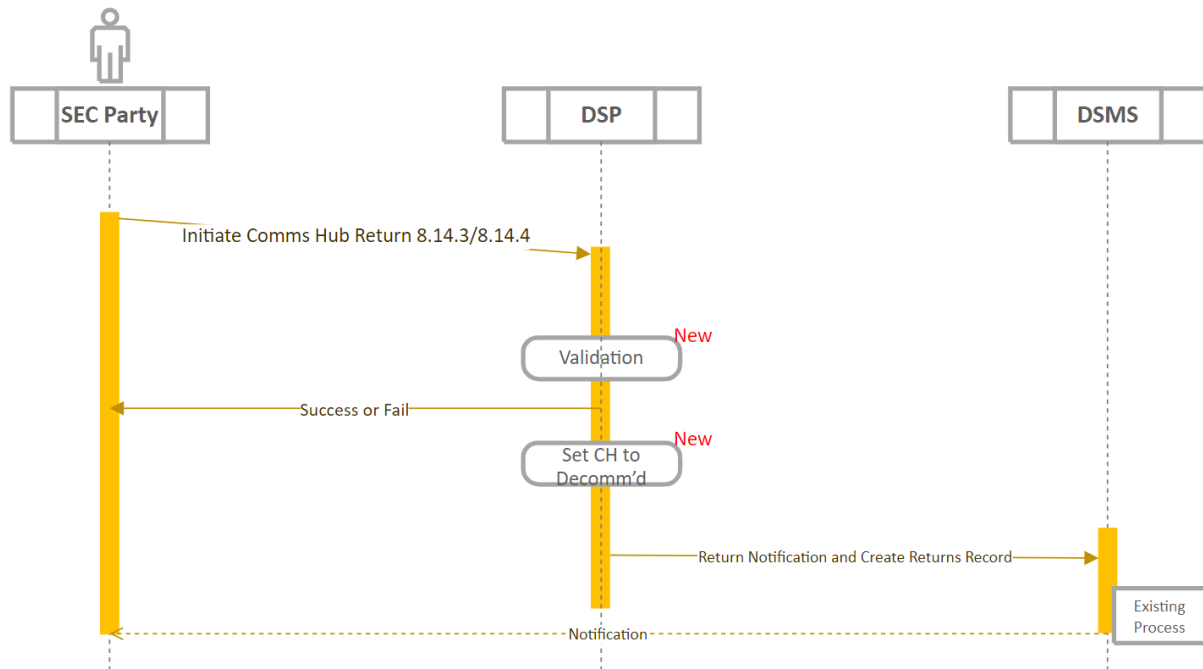
Full Process, Create Return Record



Use Case 1

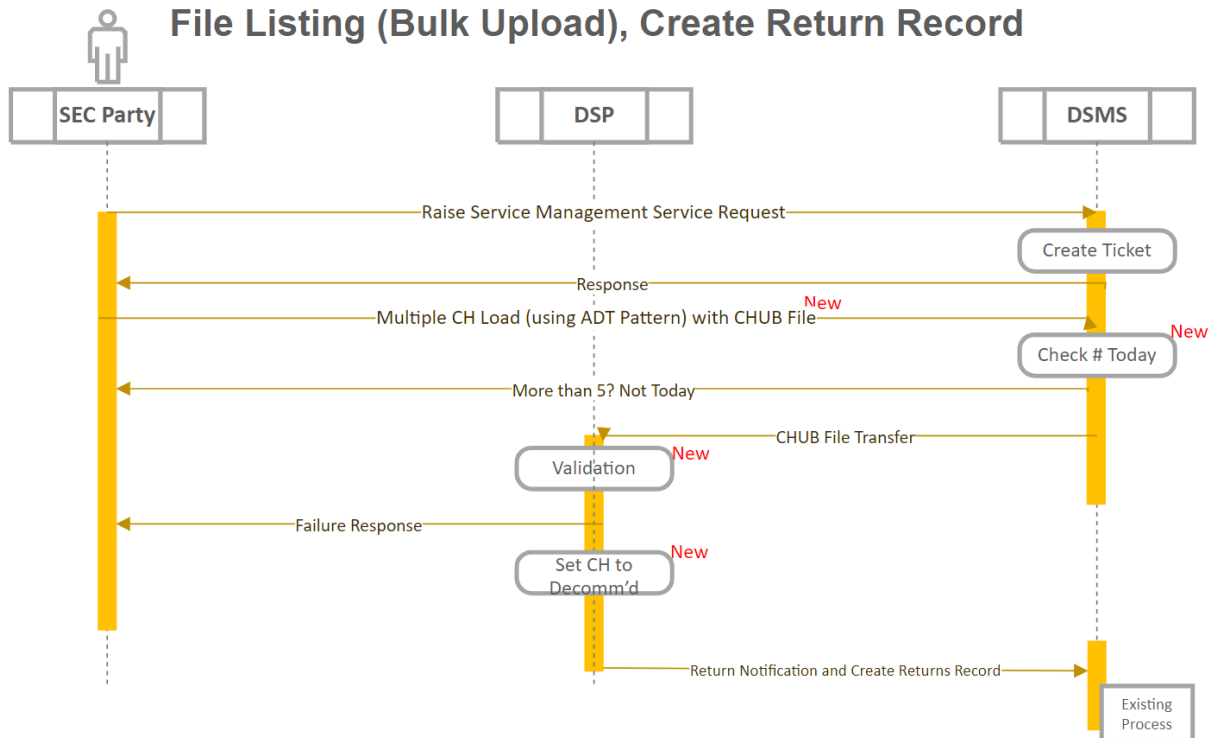
This sequence diagram describes the DCC preferred process and is sometimes referred to as the current “happy path”. In this Use Case, SEC Parties are able to send a SR8.3 ‘Decommission Device’, and when successful, the Communications Hub status in the SMI is updated to ‘Decommissioned’. The SEC Party will then send the SRV 8.14.3 or 8.14.4, which has a new DSP validation to check the SMI is set to ‘Decommissioned’ before continuing to create a Return Record in the DSMS.

Comms Hub Not Decommissioned, Create Return Record



Use Case 2

In this Use Case, the Party holding the Communications Hub prior to return has either, not submitted a SR8.3 for that Device, or is unable to submit a successful SR8.3 as they are not the Responsible Party. Once a Party submits a SRV8.14.3 or 8.14.4, and the Communications Hub Global Unique Identification (GUID) passes DSP Validation, it is set to 'Decommissioned' in the SMI. Without this change, the SMI status cannot be set to 'Decommissioned' by the DSP.



Use Case 3

This Use Case requires the User submitting a list of GUIDs for processing to create a Service Management Service Request (SMSR), and then to submit a Communications Hub Update Bulk (CHUB) file containing a list of up to 1,000 GUIDs.

Prior to submission of the CHUB file, the DCC User should raise a SMSR via the Self-Service Interface (SSI) to obtain a reference number for use in its submission to DCC, where the reference number is generated by the SSI automatically. The User should obtain submission approval from their own Second Line support and then send a CHUB File to the DCC via the DCC's secure delivery method of choice. The User submission must include: (a) the SMSR reference number in the subject line of the submission, and (b) the CHUB file in the required format, digitally signed by a Private Key associated with a File Signing Certificate and provided to an Authorised Responsible Officer (ARO) in accordance with the Smart Metering Key Infrastructure (SMKI) Registration Authority Policies and Procedures (RAPP).

The User should then update the SMSR from the submission. Validation and setting the Communications Hub status to 'Decommissioned' in the SMI follows the same pattern as the previous two Use Cases.

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
✓	DCC Other Users	✓	MAPs/ MAMs

This would impact the DCC and all SEC Parties, as it is an alternative route for any SEC Party to return a Communications Hub to the DCC.

The Proposed Solution is not expected to have any negative impact on SEC Parties, as it is intended that they will use the current Communications Hub process. There is likely to be a positive impact on SEC Parties due to non-Responsible Party being able to return a Communications Hubs to the DCC.

The Proposed Solution will have impact on SEC Parties who are in possession of a Communications Hub and not the current Responsible Supplier wishing to return a Communications Hub to the DCC. They will need to submit a CHUB file with a list of Communications Hub GUIDs to return via the SMSR.

DCC Systems

DCC System changes

This Proposed Solution will have impacts on the DSP, CSPs and DSMS. This will require additional validation by the DSP of the CHUB file contents and also number of files submitted per day. There will also be additional validation by the DSP to a check that the Communications Hub is not still communicating. If the Communications Hub is not communicating, the DSP processing will be amended to set the Communications Hub SMI status to 'Decommissioned'.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex B.

DCC System traffic

This modification will have no impact on DCC System traffic.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- SEC Section A 'Definitions and Interpretations'
- SEC Section F 'Smart Metering System Requirements'
- SEC Appendix I 'CH Installation and Maintenance Support'
- SEC Appendix Q 'IKI Certificate Policy'
- SEC Appendix AD 'DCC User Interface Specification'
- New Code Required Document - Alternative Returns for Communications Hubs

Technical specification versions

This modification will impact Appendix AD 'DCC User Interface Specification' (DUIS).

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 will affect all Communications Hubs.

Consumers

This modification will not impact Consumers.

Other industry Codes

This modification will not impact any other industry Codes.

Greenhouse gas emissions

This modification will not impact greenhouse gas emissions.

5. Costs

DCC costs

The DCC implementation costs to implement this modification is £329,626 and an additional £24,563 for first year.

The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£232,006
integration Testing, Systems Integration Testing (SIT) & User Integration Testing (UIT)	£86,300
Implement to Live	£11,320
Application Support	£24,563 for first year ²

The DCC has indicated that the Proposed Solution will incur regression testing costs which is detailed in Annex E, these costs are an initial estimate and the DCC are working to reduce them as much as possible.

More information can be found in the DCC Impact Assessment response in Annex B.

SECAS costs

The estimated Smart Energy Code Administrator & Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. 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

One Refinement Consultation respondent (Large Supplier) highlighted that it anticipates an estimated amount of under £100,000 of costs incurred by the implementation of this modification. This is due to the Large Supplier needing a Full-Time Equivalent (FTE) to handle the extra activity, noting Solution Option B would have greater on-going costs than Solution Option A. They additionally noted costs may increase in the future due to expected increase of returns with 2/3G sunsetting and 4G Communications Hubs installations. Another Refinement Consultation respondent (Large Supplier) noted Solution Option A would have minimal costs incurred.

² The Application Support will cover support in the first year, if there are no support calls, there won't be a charge. There are no expected charges after the first year.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received on or before 26 February 2025; or
- **25 June 2026** (June 2026 SEC Release) if a decision to approve is received after 6 February 2025 but on or before 25 September 2025.

The earliest possible SEC Release that can be targeted is the November 2025 SEC Release, this is based on the nine months' timescale required for implementation stated in the DCC Impact Assessment.

DUIS Schema

The DUIS Schema will require an uplift to implement the new DUIS error codes and confirmations message relating specifically to Communications Hubs returns. SECAS is aware that there are other larger industry wide projects in progress that will likely require a DUIS Schema uplift.

November DUIS uplift

If this modification is approved in time for a November 2025 Release and the DUIS Schema uplift takes place in November 2025, only DCC Users who move onto the new DUIS Schema would receive the new DUIS error codes and confirmation message. These error codes and confirmation message applies to SRVs 8.14.3, 8.14.4 and Communications Hub IDs submitted as part of a CHUB file to facilitate identification of the source of a validation failure. DCC Users who remain on an older version of the DUIS Schema will receive a generic error code from the DCC when using the new functionality. Parties will still be able to use the functionality within this modification to return Communications Hubs irrespective of the DUIS version they are using.

SECAS understands that the DUIS Schema uplift will require regression testing of SEC Party systems. As this is currently the only DUIS Schema change within the November 2025 SEC Release Parties should consider if they would prefer the DUIS Schema uplift to introduce the new error codes and confirmation message to be undertaken alongside a more significant DUIS Schema change at a later date.

7. Assessment of the proposal

Areas for assessment

Number of Communication Hubs with non-Responsible Parties

The Proposer has noted they have 20,000 Communications Hubs in their warehouses and this number is growing daily. The DCC has identified over 65,000 Communications Hubs which are not at consumer premises and instead are with non-Responsible Parties.

The Proposer agrees the confidentiality clause applies, however wanted to explore the possibility of having an opt-in scheme with clearly defined minimal data of the current Responsible Parties' data to be shared with the DCC as a mediator. They believed that this would help to immediately alleviate the current number of Communications Hubs being held in various parties' warehouses.

This was to be investigated during the development stage with many Parties requesting simplification and efficiencies of the Communications Hubs returns process can be made. Details of the investigations are noted in the 'Observations on the issue' section below.

How far will this issue grow as 2G/3G Communications Hubs are replaced?

SECAS notes that the transition to 4G Communications Hubs in 2025 will likely drive a large increase in Communications Hubs affected by this issue. Attendees at a DCC Returns workshop queried DCC about costs and volumes of Communications Hubs in supply chain at point of transition in 2025. The DCC provided information suggesting they expect c.200-300k Communications Hubs to be surplus to requirements. There was consensus to limit Communications Hubs surplus to requirements; with options to increase exchanging Communications Hubs between Parties who have surplus, limiting new orders, and having a fit for purpose returns process. The business case for the modification will be affected by these outcomes and monitored by the Communications Transition Group (CTG) as industry transitions to 4G Communications Hubs.

Sub-Committee input

SECAS has engaged the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), Privacy Sub-Committee (PSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS has received input from the following Sub-Committees to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Input on Proposed Solution and review process for smoother and easier Communication Hub returns process for all Parties involved
PSC	We do not believe this has any PSC impacts
SMKI PMA	We do not believe this has any SMKI impacts
SSC	Feedback on any security impacts based on the Proposed Solution developed
TABASC	Feedback on potential changes to business process and changes to SRVs based on the Proposed Solution developed

Observations on the issue

DCC Returns Workshop discussion

The Communications Hubs returns process was discussed at the DCC Returns Workshop in July 2023. There was agreement amongst attendees that the current process does not work well and is inefficient, with attendees noting there have been many issues raised over the last few years in various forums. Attendees felt there was a need for fit for purpose process to address issues now and for future volumes Communications Hub returns.

Below are some of the discussion points of the workshop:

- There is a disconnect between meter installers that are removing Communications Hubs and the 'back office', to create SRV for returns within current SLA, and growing number of Communications Hubs Parties don't own in their possession.
- Views expressed that a simplified process is needed and that removal of the 90-day SLA would help, along with removal of mandatory SRV from Current Supplier to the DCC:
 - Questions raised as to the implications of removing the SRVs and leaving this up to the DCC (via their CSPs) to complete upon return.
 - It was noted that more than one SEC Party has invested in systems/process to make the current process work and have capability for multiple/bulk SRV returns. While Other SEC Parties have not.
 - Noted that previous attempt to raise a Bulk Returns Process ([MP117 'Bulk CH returns'](#)) had failed on grounds of costs and lack of necessity for all.
- The DCC has had exploratory talks with DCC Service Providers (SPs) about potential simplification, however. there was no detail on system changes, time or potential costs mentioned.

The outcome of the DCC Workshop was for this Modification to be raised, and the DCC has committed to have regular call about returns process each month with SEC Parties to work through issues and progress – this will be aligned with Supply Chain Working Group monthly meetings.

Bulk returns request tool

The Proposer's organisation is currently in development of a bulk returns request tool and are aware there are several other SEC Parties who have already invested to have their own bulk returns request tool. Currently, the Proposer and others without a bulk returns request tool are needing to raise individual SRs for each Communications Hub they wish to return to the DCC. The Proposer also noted that they would not want any amendment of the Communications Hubs returns process to interfere with this. As this portion of the issue has been previously discussed under [MP117 'Bulk CH returns'](#), which was ultimately withdrawn due to the cost involved, the Proposer has requested that a bulk returns request tool not be included as part of this modification.

DCC Supply Chain Working Group discussion

This modification was discussed at the DCC Supply Chain Working Group in December 2023. There was agreement amongst attendees that the timeline for when this modification might get a solution in place is too far in the future. There were concerns that this would not alleviate issues in time for 4G rollout. There was agreement that the current process does not work well and has led to this issue of non-Responsible Parties in possession of Communications Hubs which they are unable to do anything with. Attendees felt there needed to be a quicker solution to resolve the current unidentified Communications Hubs in their possession, as this has a direct impact for Meter Asset Providers (MAP) and Suppliers. There was a request for the DCC to investigate a possible Communications Hub amnesty until this modification can look into an enduring solution which is future proofed.

Solution development

The Proposer has noted a high-level Proposed Solution whereby they need a path to return Communications Hubs to the DCC.

Solution Options

Before landing on the above Proposed Solution, the DCC had produced three Solution Options as described in the Solution Development Section.

Solution Option A

SEC Parties to return Communications Hubs to the DCC using the current method via the CSPs. The DSP will provide an interface for CSPs (and potentially in future the Accenture Device Manager to accommodate 4G Communications Hubs) to notify the DSP of a Communications Hub which has been returned. Upon notification of a Communications Hub being returned via this interface, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

Solution Option B

SEC Parties to provide the DCC with a list of intended Communications Hubs for return. The DSP will provide an interface via the SSMI for DCC to notify the DSP of Communications Hubs SEC Parties want to return. The DCC will validate the Communications Hubs returns request, by informing SEC Parties of which Communications Hubs listed requires the DCC to set the SMI status to ‘Decommission’ in order to process the Communications Hubs return. Upon the DCC receiving ‘sign-off’, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

Solution Option C

SEC Parties to return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) and will provide three possible routes for the Communications Hub return record to be created in DSMS. The three routes are, firstly upon receiving SRV8.14.3 and SRV8.14.4, the DSP will trigger an Application Programming Interface (API) call to DSMS to create the Return Record. Secondly for returns within CSP South & Central, the CSP will trigger API call to DSMS to create the unsolicited Return Record. Lastly, the DCC Logistics team will manually create an unsolicited Return Record for CSP North. Following this, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

SEC Parties can still return Communications Hubs via the existing process and the above Solution Options will sit alongside it.

These options were discarded in favour of the Proposed Solution.

Requirement Workshop

During the development of the business requirements, it was noted with the current Communications Hub returns process, CSPs are only able to process 'Decommissioned' or 'Pending' Communications Hubs. They added that the DCC did not want to encourage 'bad behaviour' of DCC Users, noting that any solution developed should be used only if Parties are unable to return Communications Hubs via the current returns process.

Working Group

The business requirements were discussed at the Working Group in April 2024. The Working Group agreed that the business requirements addressed the issue, and the modification should proceed with the request of the DCC Preliminary Assessment.

The DCC Preliminary Assessment was discussed at the Working Group in September 2024. SECAS and the DCC confirmed that all Communications Hubs are in scope, however the DCC Preliminary Assessment costings are based on 2G and 3G Communications Hubs, and the 4G Communications Hubs costs would be additional. The Working Group queried if both solutions were able to be scaled up when 2G/3G sunseting begins, which the DCC confirmed there are no scaling concerns. The Working Group noted that a slicker Communications Hubs returns process for a higher price could be worth it for the correct solution. The Working Group noted that both options would impact SEC Parties, as a non-Responsible Party would now be able to return a Communications Hubs to the DCC.

The Working Group queried at what point in the new process with payments stop for the Responsible Party. The DCC noted they have drafted an Alternative Returns for Communications Hubs Guidance document (see Annex C), which will layout the charging plan, and this would be further refined as part of the DCC Impact Assessment. The DCC noted that the party in possession' where they are not the Responsible Party, are not paying any Communications Hub charges, so the DCC charges the Responsible Party. Working Group members agreed the Proposed Solutions deliver the business requirements; however, they were evenly split on whether to proceed with Solution Option A or B.

Solution Option C was presented to the Working Group in October 2024. Working Group members raised security concerns and if the DSP would do additional checks to ensure Communications Hubs returned were not communicating before processing. The DCC noted that if the Communications Hub is still communicating, the DCC will stop and not process the return, and will go back to the Responsible Supplier/returning party. They added that they presented this new Proposed Solution to the SSC in late September 2024, and they had feedback (noted in the slides). They noted these security concerns would be addressed as part of the DCC Impact Assessment. Working Group members queried if the billing process being streamlined and highlighted that CSP North Communications Hub Returns billings are not working as they should. The DCC noted there is a large number of lost and stolen costs to industry each year. They advised there needs to be work done on billing which needs to be addressed alongside this modification.

Working Group members agreed Solution Option C should be progressed and request a DCC Impact Assessment.

The DCC Impact Assessment was discussed at the Working Group in January 2025. The Working Group queried what type of validations are the DCC Logistics team doing for the three Use Cases. The DCC stated there is no validation nor impact on the DCC Logistics team, as they will use the current processes. They added that using the existing process was directed by the SSC, which recommended the DCC to not have any manual nor DCC Logistics intervention in facilitating the

Communications Hub returns process. The Working Group queried if the DCC Logistics team validates the correct GUIDs for returns. The DCC advised that the validation will be completed automatically by the DSP. They added that the DCC Logistics team will follow the same process now, which involves checking the pallet and Communications Hubs on the pallet with the existing ticket in the SMSR.

OPSG views

The business requirements were discussed with the OPSG in April 2024. The OPSG requested more clarity on processed and charges, and to consider using the refurbishment process. They agreed that the modification should proceed with the request of the DCC Preliminary Assessment.

The DCC Preliminary Assessment was presented to the OPSG in September 2024 where there were no comments at this stage.

SSC views

The DCC Preliminary Assessment was discussed with the SSC in August 2024. The SSC noted no security implications and would like to regular updates as this modification progresses.

The DCC presented Use Case scenarios to the SSC in November 2024. The SSC requested the DCC to use existing Communications Hubs returns processes and recommended not to have any manual interventions when facilitating the Communications Hub returns process.

SECAS and DCC presented the DCC Impact Assessment additional validations for Use Case scenarios to the SSC in January 2025. The SSC were satisfied with the business process authentications (which are similar to Anomaly Detection Thresholds (ADTs)), the process 'touchpoints' to relevant SEC Parties and the increased validations were suitable. The SSC noted there is possibly impacts on the Certificate Policy or the SEC Appendix D 'SMKI Registration Authority Policies and Procedures' (SMKI RAPP). SECAS and the DCC noted they would investigate the impacts and, if needed, include them into the legal text accordingly. Following the SSC meeting, SECAS and the DCC investigated and have found impacts to SEC Appendix Q 'IKI Certificate Policy', they have been included into the legal text.

Refinement Consultation responses

All Refinement Consultation respondents were supportive of the modification.

One Respondent (Large Supplier) preferred Solution Option B, due to the costs and shorter delivery time.

Another Respondent (Large Supplier) preferred Solution Option A, as it was a cleaner approach, with less ongoing costs and complexity for the Respondent. They added that there needs to be more work done to try and reduce the implementation approach in order to realise the benefits and support the transition to 4G Communications Hubs. They added that Solution Option B would add complexity and costs due to multiple handling of the returned Communications Hubs. They noted that although agree in principal that the modification should be approved, more details around the costings are required. They added that more information and detail is needed to understand how the DCC concluded with the 'Deemed Removal Date' noted in the DCC Guidance Document.

Another Respondent (Large Supplier) highlighted that Solution Options A and B would appropriately handle the issues outlined. They added that although Solution Option A is more expensive, it would be less reliant on DCC user input, whereas Solution Option B carries a lower cost but more input from DCC users. They added that there is a potential that this activity will improve the Smart Meter data quality around removed CHF's, which stands to bring benefits to all DCC Users.

Discussions at CSC

At the January 2025 CSC, a CSC member noted this modification was discussed at Communications Transition Group the day before, and it was suggested that SEC Parties to segregate their Communications Hub returns into fault and non-fault bundles when returning to the DCC. SECAS and the DCC noted that there is no change to the existing returns process, therefore MP252 will not be requesting SEC Parties to segregate their Communications Hub returns. The CSC member added that even if they were able to segregate the returns, there was still a bottleneck to ship the Communications Hubs back to the DCC and queried the reason there was a limit for each CHUB file. The DCC noted that the CHUB file limit of 1,000 was a limit suggested by the SSC. A CSC member noted that only DCC Users with access have been signed off by the SSC and didn't understand why a limit was needed. The DCC noted that the CHUB file submission follows the same path as ADT files, which is signed by the submitting DCC User and returned to the same DCC User.

8. Case for change

Business case

Implementing this modification will create a route for SEC Parties to return Communications Hubs in their possession, where they are not the Responsible Supplier.

Many Parties are in support of a review and update of the Communications Hub returns process, and all Refinement Consultation respondents were supportive of the modification.

The current Proposed Solution has considered the Refinement Consultation responses and the Working Group was supportive.

The DCC Logistics team has estimated since 2020, DCC Customers have paid approximately £4.3 million (£1.7 million for 2024 alone) in Lost or Stolen³ charges, which might have been avoided if DCC Customers were able to return Communications Hubs directly to the DCC.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (a)⁴, as it will allow existing stock to be reused or recycled in the supply chain of Communications Hubs, and their critical

³ Lost or Stolen is the category for Communications Hubs (and Devices) that haven't been returned to DCC and are not "on the wall".

⁴ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

components allows Device procurement to operate more efficiently and provides assurance to DCC Users on stock levels so that they can effectively plan installations.

Industry views

The Working Group were supportive of the modification.

Two Refinement Consultation respondent believed that this modification better facilitates General SEC Objective (a) and (g)⁵, with one of the respondents also believing it would better facilitate General SEC Objective (d)⁶.

Views against the consumer areas

Improved safety and reliability

This modification will be neutral against safety and security for consumers.

Lower bills than would otherwise be the case

This modification will have an indirect positive impact against this consumer benefit area, as it will reduce additional costs that will not be further passed onto consumers.

Reduced environmental damage

This modification will ensure the Communication Hubs are able to be reused or recycled where possible.

Improved quality of service

This modification will be neutral against this consumer benefit area.

Benefits for society as a whole

This modification will be neutral against this consumer benefit area.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	5 Oct 2023

⁵ Facilitate the efficient and transparent administration and implementation of this Code.

⁶ Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy

Timetable	
Event/Action	Date
Presented to CSC for initial comment	17 Oct 2023
CSC converts Draft Proposal to Modification Proposal	19 Dec 2023
Business requirements developed with Proposer and the DCC	20 Dec 2023 – 15 May 2024
Modification discussed with the Working Group	3 Apr 2024
Business requirements discussed with OPSG	9 Apr 2024
Preliminary Assessment requested	1 Jul 2024
Preliminary Assessment returned	6 Aug 2024
Preliminary Assessment discussed with SSC	28 Aug 2024
Preliminary Assessment discussed with Working Group	4 Sep 2024
Preliminary Assessment discussed with OPSG	10 Sep 2024
Refinement Consultation	18 Sep – 9 Oct 2024
Modification discussed with Working Group	2 Oct 2024
Impact Assessment costs approved by Change Board	23 Oct 2024
Impact Assessment requested	24 Oct 2024
Impact Assessment returned	31 Dec 2024
Modification discussed with Working Group	15 Jan 2025
Modification Report approved by CSC	21 Jan 2025
Modification discussed with SSC	22 Jan 2025
Modification Report Consultation	29 Jan – 18 Feb 2025
Change Board Vote	26 Feb 2025

Italics denote planned events that could be subject to change

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
ADT	Anomaly Detection Threshold
API	Application Programming Interface
ARO	Authorised Responsible Officer
CH	Communications Hub
CHF	Communications Hub Function
CHUB	Communications Hub Update Bulk
CSP	Communications Service Provider
CTG	Communications Transition Group
DCC	Data Communications Company

Glossary	
Acronym	Full term
DSMS	DCC Service Management System
DSP	Data Service Provider
DUIS	DCC User Interface Services
FTE	Full-time employee
GPF	Gas Proxy Function
GUID	Global Unique Identification
MAP	Meter Asset Providers
MAM	Meter Asset Manager
MOP	Meter Operator
OPSG	Operations Group
PIT	Pre-Integration Testing
PSC	Privacy Sub-Committee
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	service level agreement
SM WAN	Smart Metering Wide Area Network
SMI	Smart Metering Inventory
SMKI	Smart Metering Key Infrastructure
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMKI RAPP	Smart Metering Key Infrastructure Registration Authority Policies and Procedures
SMSR	Service Management Service Request
SP	Service Provider
SRV	Service Request Variant
SSC	Security Sub-Committee
SSI	Self-Service Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integration Testing