

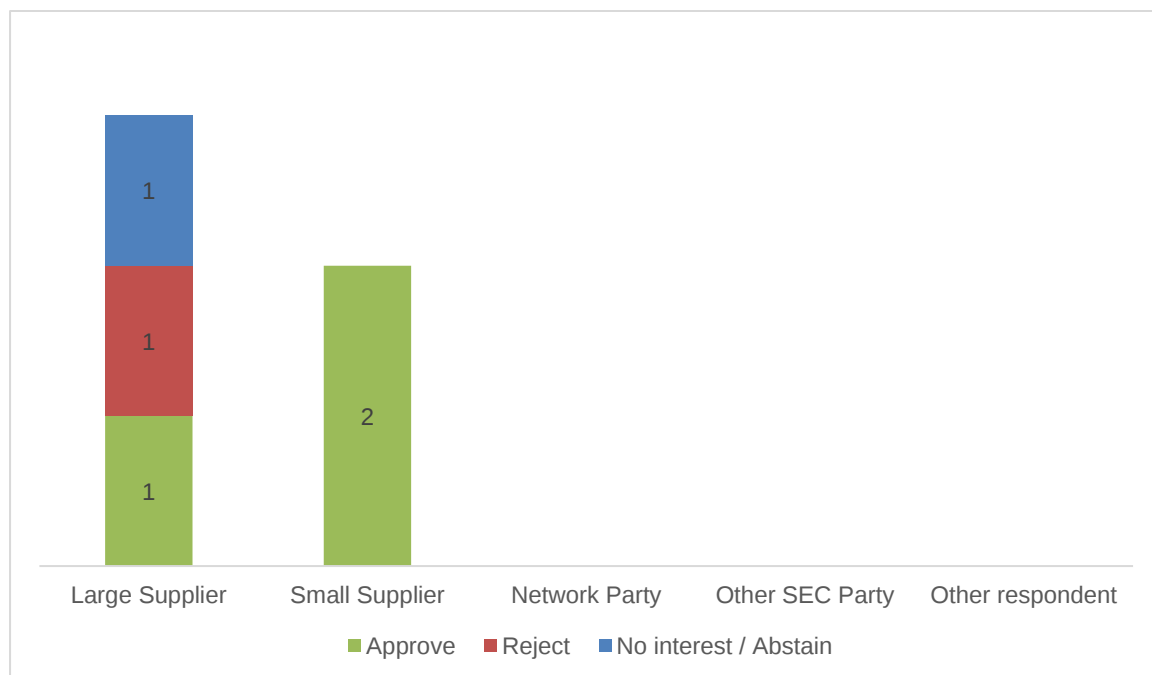
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MP262 ‘Extending the Installation End Date for CHTS v1.0 and GBCS v1.1’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP262 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP262 should be approved or rejected?

Question 1			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Reject	The TSAT exists for a reason ... to ensure that installations have the best chance of a secure, operable customer experience. The TSAT deadline in question has already been extended once. The TABASC view is that this second TSAT extension should not happen. Installations cannot be prevented, but there should not be official support for Comms Hubs that have known defects, and which do not support a Pre-Payment customer out-of-the-box. (There is also a responsibility on the DCC to accept the return of the Comms Hubs that have these defects). Official TSAT support does not incentivise improved stock management practices in the future. The "green" argument for installation of these comms hubs may be negated if a second visit to a customer premise is required to remediate any issues caused by upgrade failures (with potential scrapping of the Comms Hub). The financial impact of a second visit may be born by a churn Supplier. Utilising these old Comms Hubs increases the chance of a poor customer experience, with a consequential negative view of the SMART program.
British Gas	Large Supplier	Approve	General SEC Objective (a)
Octopus	Large Supplier	Abstain	We are abstaining from approving or rejecting this modification as we do not have a strong view either way. As we no longer have any CHTS v1.1 and GBCS v1.0CH in stock, we do not directly benefit from the modification. We support the argument from TABASC that this modification is not required and that technically CHs operating CHTS v1.1 and GBCS v1.0 can still be installed and therefore the main impact this modification is attempting to address is whether these installs will be considered qualifying or not. We would prefer to abstain in this circumstance as the changes and costs associated with this modification are minimal so if there is a benefit to some SEC Parties then we would not want to reject the modification.
Drax	Small Supplier	Approve	The Installation End Date for this combination was 30 th April 2023, meaning that any stock remaining after that date can be installed but won't count towards Suppliers' rollout targets. If an extension isn't approved, it is likely to result in approximately 122,000 uninstalled Communications Hubs being scrapped, causing a significant negative environmental impact and adding to the escalating costs of the Smart meter rollout. 2G and 3G Comms Hubs will be phased out by 2033 so the responsible

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Question 1			
Respondent	Category	Response	Rationale
			course of action is for Suppliers to install remaining stock now, rather than scrapping perfectly functional, reliable and secure devices. In our view, MP262 facilitates SEC objective (a) 'To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain', as it would prevent significant numbers of Communications Hubs from being unusable and likely being scrapped.
Opus	Small Supplier	Approve	We believe that this modification should be approved because it better facilitates SEC objective (a) 'To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain'. Our rationale is set out further below, but in summary, approval of MP262 would permit large numbers of perfectly serviceable, reliable and secure Communications Hubs to be installed, preventing them from likely being scrapped with associated environmental and financial cost impacts to industry and consumers. There are approximately 122,000 uninstalled Communications Hubs which are compliant with the Communications Hub Technical Specifications (CHTS) v1.0 and the Great Britain Companion Specification (GBCS) v1.1. This is not an isolated issue, but is far-reaching, covering a number of different Suppliers across the industry, and is one that has also been encountered previously. Given the challenges for Suppliers to install these hubs, a previous extension was granted as part of MP221 'CHTS v1.0 and GBCS 'v1.1 Installation End Date and Maintenance End Date'. At that time, there were approximately 200,000 uninstalled Communications Hubs. The extension under MP221 was for just 3 months and following this, the numbers of uninstalled hubs has fallen to around 122,000 hubs. It has been clearly demonstrated that the previous 3-month extension granted under MP221 was insufficient for industry to clear the backlog. A further extension of the Installation End Date to 30/04/25 should enable installation of the remaining stock of these Communications Hubs across the industry. In line with SEC objective a), approval of MP262 would facilitate the efficient installation and operation of these Communications Hubs at Energy Consumers' premises within Great Britain' and would prevent large numbers of Communications Hubs potentially being scrapped. One of the fundamental issues faced by Suppliers, and outside of their control, is that the DCC has not been able to accommodate Suppliers returning these hubs. As a result, modification, MP252 'Amending the process for Communications Hub returns' is aiming to address the recognised current issue of large volume returns of Communications Hubs.

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			Suppliers incur ongoing costs for any uninstalled Communications Hubs and so are directly incentivised to reduce their stock levels but because the DCC has been unable to facilitate returns, coupled with factors such as the slower expected uptake of smart metering, this has not been possible.

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
E.ON	Large Supplier	The argument that extending the TSAT would allow a backstop in case of 4G Comms Hub deployment issues is invalid. The proposed TSAT extension to 30/04/25 would expire before 4G Comms Hubs are available in DCC bulk deliveries (from July 2025).
British Gas	Large Supplier	We are a bit confused as to what has been happening with these devices between April 2023 and now, whilst they were outside of the TSAT dates.
Octopus	Larger Supplier	No further comments
Drax	Small Supplier	The Security Sub-Committee (SSC) did not object to extending the installation date for these Devices, noting that no specific security issue has been identified to prevent the installation of the Communications Hubs as long as the latest security firmware upgrade is completed as soon as possible after installation.
Opus	Small Supplier	No further comments