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MP282

‘Removal of Registration Check for Suppliers using SR8.9 targeting SMETS2+ CHF’

Modification Report

Version 1.1

2 April 2025



About this document

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

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Chun Chen from the Data Communications Company (DCC).

The Communications Hub Function Device Log is populated by Service Request (SR) 8.11 '*Update HAN Device Log*' during Install and Commission (I&C), or SR8.12.1 '*Restore HAN Device Log*' during Communications Hub (CH) Replacement. If either SR times out, the Device Log will be empty. Suppliers may attempt SR8.9 '*Read Device Log*', before re-attempting SR8.12.1.

However, at present SR8.9 has a registration check (E4 validation), which does not allow Suppliers to access the Device Log. This can cause disruption to the smart metering setup as without the Device Log, the Data Service Provider (DSP) will continue to utilise the old CH instead of the newly installed one. In some instances, a new I&C process would need to be completed to resolve the issue.

The Proposed Solution would be that when either an 'Import Supplier' or 'Gas Supplier' sends a SR8.9 targeting a Smart Metering Equipment Technical Specifications (SMETS)2+ Communications Hub Function (CHF), the registration check (E4 validation) should not apply. The modification costs would be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort. This is a Self-Governance Modification and, if approved, is targeting implementation as part of the June 2025 SEC Release.

2. Issue

What are the current arrangements?

The CHF Device Log is populated either by SR8.11 '*Update HAN Device Log*' during the I&C process or SR8.12.1 '*Restore HAN Device Log*' during the CH Replacement process. For CH replacement, SR8.12.1 will be utilised to ensure the Home Area Network (HAN) Devices from the current CHF are transferred to the new CHF. This results in a command to restore the CHF Device Log. The Device data originates from the DSP copy of the CHF Device Log and will

- Transfer all Meter Point Administrator Number (MPxN) Device associations from the old CHF to the new CHF.
- Send the DCC N30 Alert to the Registered Suppliers.
- Update the new CHF Device Log backup.

If the response to restore the CHF Device Log is missing, the DSP cannot update the data, and as such, the old CH continues to be used by the DSP.

What is the issue?

If SR8.11 or SR8.12.1 results in a time out, the DSP's copy of the CHF Device Log will be empty. When a Supplier subsequently attempts to use SR8.9 to read the Device Log this results in E4 validation failure, as the DSP will not recognise the Supplier as an Eligible Device User.

In these instances, a DCC User will retry any SR if the previous one times out, however there are challenges and risks associated with a retry of SR8.12.1:

1. Retrying SR8.12.1 can overwrite CHF Device Log:

- SR8.12.1 is critical to the CH replacement process.
 - Retrying SR8.12.1 overwrites the CHF device log with the previous DSP copy.
 - If the previous SR8.12.1 was already successfully processed by the CH, a retry can disrupt the functioning of an already operational smart metering setup within the energy consumer premises.
2. Using SR8.9 as a verification mechanism is blocked by E4 Validation:
- Suppliers cannot use SR8.9 to confirm the CHF Device Log status before retrying SR8.12.1 due to the E4 validation rule.
 - Without this capability, there is no mechanism to determine whether the CHF Device Log contains devices or not, increasing the risk of disrupting the smart metering system.
3. Potential System Failures:
- Retry of SR8.12.1 could cause a fully operational smart metering system to lose communication, requiring a full I&C process to restore functionality.
 - This issue is exacerbated in split-Supplier scenarios or when the original install code is unavailable, complicating resolution efforts.

What is the impact this is having?

There is no mechanism to confirm whether SR8.12.1 has been successfully processed by the CH in the event of a timeout, where the CH response is not received by the DSP for any reason.

This limitation prevents Suppliers from verifying the CHF Device Log status before retrying SR8.12.1. A retry in such cases risks overwriting the CHF Device Log with outdated information, which could disrupt an already functioning smart metering system and result in a complete loss of communication.

Recovery would then require a full I&C, which may be particularly challenging in split-Supplier scenarios or if the original install code is not immediately available.

Impact on consumers

The issue may have an impact on consumers if the CH Device Log is not restored following a replacement, as a retry may result in disruption to the Smart Metering setup and require an I&C.

3. Solution

Proposed Solution

The Proposed Solution would look at removing the E4 validation for SR8.9 when targeting SMETS2+ CHF from the 'Import Supplier' or the 'Gas Supplier'. The DCC would implement this on the DSP via an internal change request. Therefore, the SEC changes proposed would look to align the legal text with the technical solution.

The Proposed Solution would make legal text amendments to SEC Appendix AD 'DCC User Interface Specification' and SEC Appendix AB 'Service Request Processing Document'.

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

'Import Suppliers' and 'Gas Suppliers' will be positively impacted by this modification as the removal of registration checks would facilitate their obtaining of CHF Device Log information and streamline CH replacement.

The DCC would be impacted by this modification as it will require a technical change to the DSP, which the DCC will coordinate as part of an internal change request.

DCC Systems

DCC System changes

This modification would require a DCC System change as the DSP would require amendments to remove the E4 Validation from SR8.9 when targeting SMETS2+ CHF.

DCC System traffic

This modification will not have an impact on DCC System traffic.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AB 'Service Reference Processing Document'
- Appendix AD 'DCC User Interface Specification'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Devices

Devices impacted			
	Electricity Smart Metering Equipment		Gas Smart Metering Equipment
✓	Communications Hubs		Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices

Managed by

Devices impacted			
	Standalone Auxiliary Proportional Controllers		Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

This modification would have a positive impact on Communications Hubs as it would facilitate CH replacement where SR8.12.1 has timed out and the retry would risk an overwriting of the CHF Device Log.

Consumers

The Proposed Solution would have a positive impact on Consumers as it would facilitate CH replacement in the event of SR8.12.1 timeout.

Other industry Codes

This modification does not have an impact on other industry Codes.

Greenhouse gas emissions

This modification does not have an impact on greenhouse gas emissions.

5. Costs

DCC costs

The DCC costs will be included in the internal DCC Change Request.

SECAS costs

The estimated 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

SECAS presented this modification at the SEC Issues Group in February 2025 and Parties did not indicate whether there would be any costs associated with this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **26 June 2025** (June 2025 SEC Release) if a decision to approve is received on or before 11 June 2025; or
- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received after 11 June 2025 but on or before 23 October 2025.

It is recommended that the modification is included in the earliest available SEC Release as the associated DCC changes are targeted for an implementation in June 2025. The text changes in the SEC would ensure the DCC change is compliant with its SEC obligations.

7. Assessment of the proposal

Areas for assessment

Sub-Committee input

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

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Are there any operational concerns regarding the issue?
PSC	No input required
SMDASC	No input required
SMKI PMA	No input required
SSC	Are there any Security concerns with the Proposed Solution?
TABASC	Would the Proposed Solution resolve the issue identified?
TAG	Are there any testing concerns regarding the issue?

Observations on the issue

This issue and possible solutions were first discussed at the DCC Design Release Forum (DRF) in October 2024. This issue and its solution were discussed by the Department of Energy Security and Net Zero (DESNZ) as part of the Technical Specification Issue Resolution Subgroup (TSIRS). It was also discussed at the Trust Centre Swap-out Issue Resolution Group (TIRG). The Proposed Solution was refined as a result of the feedback received from these forums.

Attendees of the groups supported the modification and its Proposed Solution.

This was also discussed at the February 2025 SEC Change Working Group. The Working Group attendees did not express a view on the issue and its Proposed Solution. However, no further concerns were raised to consider as part of the modification.

The modification was presented at TABASC, SSC, OPSG and TAG. The SSC did not identify any security concerns relating to the proposed solution.

The TABASC noted the modification and expressed support that the solution implementation is appropriate to resolve the issue as soon as reasonably practicable.

The OPSG and TAG discussed the implementation route, as the DCC would be including this modification in a DCC Maintenance Release. The DCC clarified that the reason the modification is included in a DCC Maintenance Release is due to its small complexity, risk and cost. The modification would support with 4G Communications Hubs mass rollout in June 2025. The OPSG supported the modification following this discussion. The TAG supported the proposed solution.

8. Case for change

Business case

The Proposed Solution would facilitate CH replacement as Suppliers would be able to read the CHF Device Log using SR8.9. This would minimise the possible impact on smart metering setups and avoid the need for an I&C, which would be more cost-effective.

The issue is currently affecting 2G/3G-to-2G/3G CH replacements. However, with the rollout of 4G CHs, there is a risk of this issue occurring in the event of 4G-to-4G CH replacement where communication with the CH fails.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification will better facilitate SEC Objective (a)¹, as the removal of E4 validation would facilitate Import and Gas Suppliers' ability to replace CHs in the event of timeout of SR8.12.1.

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on this area.

Lower bills than would otherwise be the case

This modification will have a neutral impact on this area.

¹ facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

Reduced environmental damage

This modification may have a positive impact on this area, as the removal of registration checks for SR8.9 in instances where SR8.12.1 has timed out would avoid a full I&C. This would in turn reduce the need of further resources to restore functionality.

Improved quality of service

This modification will have a neutral impact on this area.

Benefits for society as a whole

This modification will have a neutral impact on this area.

Final conclusions

The Device Log information is required for CH I&C and replacement. If either SR8.11 or SR8.12.1 time out, the Proposed Solution would look to facilitate the Suppliers' ability to ascertain whether the CHF Device Log contains Devices or not. This would minimise the risk of disrupting the smart metering setup, as well as avoiding the need for a full I&C.

The industry has shown support for the modification and the Proposed Solution at TSIRS, TIRG and DRF. There is some time-sensitivity around the implementation of the modification by June 2025 to ensure that the DSP technical changes are reflected in the SEC.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	11 Feb 2025
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>18 Feb 2025</i>
Modification Report approved by CSC	18 Feb 2025
Modification discussed at TABASC	6 Mar 2025
Modification discussed at SSC	12 Mar 2025
Modification discussed at OPSG	24 Mar 2025
Modification discussed at TAG	26 Mar 2025
Modification Report Consultation	2 Apr – 23 Apr 2025
Change Board Vote	21 May 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
CSC	Change-Sub-Committee
CH	Communications Hub
CHF	Communications Hub Function
DCC	Data Communications Company
DESNZ	Department of Energy Security and Net Zero
DSP	Data Service Provider
DUIS	DCC User Interface Specification
DRF	Design Release Forum
ESME	Electricity Smart Metering Equipment
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
I&C	Install and Commission
MPxN	Meter Point Administrator Number
OPSG	Operations Group
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMDASC	Smart Metering Device Assurance Sub-Committee
SMETS	Smart Metering Equipment Technical Specification
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SR	Service Request
SRPD	Service Request Processing Document
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
TIRG	Trust Centre Swap-out Issue Resolution Group
TSIRS	Technical Specification Issue Resolution Subgroup