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Paper Reference:	OPSG_115_0904_11
Action:	For discussion
<u>Acronyms and Defined Terms SEC Glossary</u>	

MP252 – Business Requirements

1. Purpose

The purpose of this paper is to present the business requirements for [MP252 'Amending the process for Communications Hub returns'](#). We seek the Operations Group's (OPSG) views on whether the business requirements are suitable for Preliminary Assessment and whether the business requirements are clear and unambiguous.

2. Summary of MP252

This section summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix A, and the business requirements are available in Appendix B.

2.1 What is the issue?

The Communications Hubs in the Proposer's (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 service level agreement (SLA), there is a financial impact for the Party in possession of the Communications Hub, the Responsible Supplier and indirectly, consumers.

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.

Smart Energy Code (SEC) Section F 'Smart Metering System Requirements' and Appendix I 'CH Installation and Maintenance Support Materials' details the requirements/obligations to enable Parties to return Communication 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 Data Communications Company (DCC).

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 issues now and for future volumes of Communications Hub returns.

The Proposer also highlighted that the volume of Communications Hubs will continue to increase and likely at an accelerated rate once there is a move into the 4G Communications Hubs.

2.2 What is the potential solution?

The Proposer would like a method to allow SEC Parties, including Non-Responsible Parties, to return Communications Hubs to the DCC. The DCC would then be able to process the returned Communications Hubs, either for reuse or recycle.

2.3 What has been discussed so far and what we have done?

During a requirements workshop session, the Communications Service Providers (CSPs) noted that any Communications Hub, which is returned and not in a Smart Metering Inventory (SMI) state of 'Decommissioned' or 'Pending', cannot be processed for reuse or recycle. These are currently held at CSPs warehouses with no option of how to process them. The DCC noted that they do not want to encourage 'bad behaviour' of DCC Users returning non-Decommissioned Communications Hubs and would still encourage DCC Users to follow the current returns process.

The Working Group will discuss this modification on 3 April 2024 and SECAS will provide a verbal update during the OPSG meeting on 9 April 2024.

3. Business Requirements

Business Requirements		
Ref.	Requirement	Responsible for delivery
1	SEC Parties, including Non-Responsible Parties, shall notify DCC when they want to return Communications Hubs	DCC
2	DCC shall develop a mechanism to allow Non-Responsible Parties to return Communications Hubs, where the Communications Hub state in the SMI is 'Commissioned' or 'InstalledNotCommissioned'	DCC
3	DCC shall develop a mechanism to check all intended Communications Hubs returns for their current SMI state	DCC
4	DCC shall notify SEC Parties whether their request for Communications Hubs return has been accepted or rejected	DCC
5	DCC shall notify the Responsible Party of Communications Hubs in the returns process that the DCC has in their possession	DCC
6	DCC shall process the accepted Communications Hubs	DCC
7	DCC shall develop a mechanism to charge the Responsible Party for the non-compliant returned Communications Hubs	DCC
8	DCC shall accept the return of end-of-life Communications Hubs	DCC
9	Reporting to monitor Communications Hub returns data	DCC

4. Questions for the Operations Group

We seek the OPSG's input on the following questions to feed into the modification before we request the Preliminary Assessment.

- Is reporting of Non-Responsible Party Communications Hub returns needed?
- What Communications Hub returns reporting would be useful for industry?
- Are there any additional considerations needed for end-of-life Communications Hubs?
- Are the detailed business requirements clear and unambiguous?
- Are the business requirements suitable to proceed to Preliminary Assessment?
- Any further feedback or considerations on this proposal?

5. Next steps

SECAS will request the DCC Preliminary Assessment in mid-April 2024, with an expected return date in mid-May 2024. Once the DCC Preliminary Assessment is returned, SECAS will present this to the Working Group, OPSG Sub-Committee and Security Sub-Committee.

6. Recommendations

The OPSG is requested to:

- **CONFIRM** if any reporting of Non-Responsible Party Communications Hub returns needed.
- **CONFIRM** any Communications Hub returns reporting needed.
- **CONFIRM** any considerations needed for end-of-life Communications Hubs.
- **CONFIRM** the detailed business requirements are clear and unambiguous.
- **CONFIRM** the business requirements are suitable to proceed to Preliminary Assessment.

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SECAS Team

2 April 2024

Attachments:

Appendix A: MP252 Modification Report

Appendix B: MP252 Business requirements