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MP178

‘Removing DSP validation against the SMI join status for SR8.8.x’

Modification Report

Version 0.8

14 December 2022



About this document

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

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This document also has five annexes:

- **Annex A** contains the full responses received to the request for information (RFI).
- **Annex B** contains the business requirements for the solution.
- **Annex C** contains the full DCC Preliminary Assessment response.
- **Annex D** contains the process flow diagrams relating to this modification.
- **Annex E** contains the full responses received to the Refinement Consultation.

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1. Summary

This proposal has been raised by David Walsh from the Data Communications Company (DCC).

Installation and Commissioning (I&C) of Smart Metering Systems (SMS) or exchange of Devices within a SMS are failing due to on-site installers being unable to 'unjoin' Devices.

There are occasions when the initial join is unsuccessful or there was an issue with the Devices being joined, and therefore the engineer will need to unjoin the Devices before attempting to re-join the again. Alternatively, when a Device is being exchanged it needs to be un-joined before the new Device can be joined.

The unjoin is unsuccessful because it requires validation of the initial join. However, where the join has not been processed properly, the unjoin command will fail.

When this occurs, currently, the only way to complete the I&C process is a manual update of the SMI database. This is completed by the DCC at a cost of £2,000 per update, and this cost is then socialised across SEC Parties in Fixed Charges.

The Proposed Solution aims to remove Data Service Provider (DSP) validation of Join status in the SMI when sending an Unjoin Service Request. This will allow the sending of unjoin commands irrespective of the join status held in the SMI. This solution would prevent the Response Code E080801 from being created in association with an unjoin command.

This modification does not intend to alter current Security elements of the process.

This modification will impact Suppliers, Other SEC Parties and the DCC. The estimated cost of the DCC System changes up to the end of Pre-Integration Testing (PIT) is between £10,000 and £75,000 – post-PIT costs will be assessed in the DCC Impact Assessment. This modification is targeted for the November 2023 SEC Release. This will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

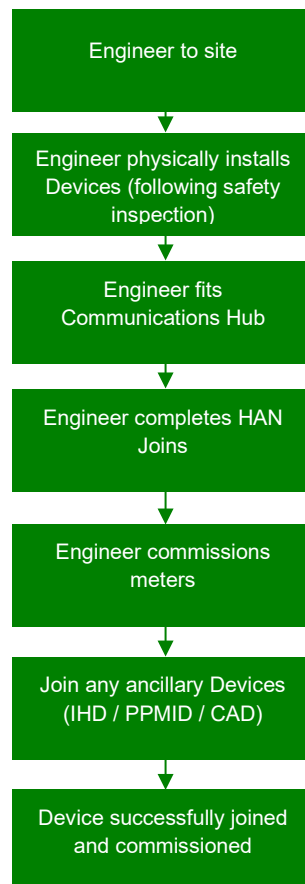
During the Install and Commissioning (I&C) process, an engineer is on site and installs the Devices. Communications Hub Commissioning of the meter is done by the Service User sending a series of Join Commands (SRVs 8.7.x) to connect the Devices to the Communications Hub, thereby completing the I&C process.

There are occasions when the initial join is unsuccessful or there was an issue with the Devices being joined, and therefore the engineer will need to unjoin the Devices before attempting to re-join again. Alternatively, when a Device is being exchanged it needs to be un-joined before the new Device can be joined.

An issue has been brought to the DCC's attention whereby the on-site Device I&C process fails because the DSP does not receive successful messages for joins of Service Reference Variants (SRVs) 8.7.x. Because the validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that a Device is joined to the Smart Metering Inventory (SMI),

if this has not completed properly the Service User cannot send an Unjoin command. This results in Devices failing the I&C process. The current 'work-around' is to manually update the SMI database.

The flow diagram below sets out the current step-by-step procedure of the on-site Device I&C process:



What is the issue?

It has been reported by Suppliers that the on-site I&C process for Devices can fail where the DSP does not receive successful messages for joins of SRVs 8.7.x. For example, there may be problems joining a Consumer Access Device (CAD) to Electricity Smart Metering Equipment (ESME).

When this occurs, currently, the only way to complete the I&C process is a manual update of the SMI database. This is completed by the DCC at a cost of £2,000 per update, and this cost is socialised in Fixed Charges. This is because:

- it is not possible to continue the I&C process by retrying the Join; and/or
- there have been instances where the Device will reject the retry of the Join command (SR8.7.x) if a previous Join was already successfully completed.

Between August 2020 and July 2022 there have been five cases (across different Suppliers) where the response to the SRV 8.7.2 'Join Service (Non-Critical)' is not received by the DSP despite the join working within the ESME. Hence, the Service User is unable to send an Unjoin command as the

business validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that only Devices joined in the SMI may be un-joined. Note that SRV 8.8.1 is used with Critical commands, while SRV 8.8.2 is used with non-Critical commands. Although there are only five instances of Users requesting the manual correction by the DCC, Users have noted there are more instances of issue occurring where no manual correction was requested.

There are instances where if the Service User sends SR 8.7.2 again to the ESME then this will pass through the DSP, but it is then rejected at the ESME as it is already joined.

Smart Energy Code (SEC) Schedule 8 'GB Companion Specification' (GBCS) mandates that Devices should accept a re-send of the SR 8.7.x 'Join Service' command, even if the Device is already joined (for example, it is already in the Device Log).

The DSP currently updates the SMI and sets up the join relationship depending on the response to the Join command. As part of the Unjoin command, SRV 8.8.2 validates the SMI join relationship. For example, the system only allows the Unjoin command (SR 8.8.x) if Devices are already joined to each other, otherwise the DSP will reject the Service Request with the following error code:

DCC User Interface Specification Response Codes	
Response Code	Response Code Description
E080801	According to the DCC Systems Smart Metering Inventory the 'Other Device' is not joined to the Business TargetID Device

It should be noted that there are no Smart Metering Technical Specifications (SMETS), GBGS, Security or any other SEC requirement mandating that the DSP must apply such validation other than what is defined in the DCC User Interface Specification (DUIS).

What is the impact this is having?

If the issue identified under this proposal is not addressed, there will be:

- Further I&C failures; and
- an ongoing cost to manually correct the SMI database to allow Users to reuse any Devices.

Each manual database correction is charged to the DCC at an average of £2,000, which is socialised within Fixed Charges. Any firmware fixes of meter defects normally take more than 12 months to deploy.

Up to July 2022 there has been five known incidences, and further incidents are expected.

Although there are only five instances of Users requesting the manual correction by the DCC, Users have noted there are more instances of issue occurring where no manual correction was requested.

Impact on consumers

If the issue is left unresolved, more Devices will not have been commissioned and will therefore not be providing smart functionality and benefits of smart features to consumers.

3. Solution

Proposed Solution

The Proposed Solution aims to remove the DSP validation of Join status in the SMI when sending an Unjoin Service Request. This will allow the sending of unjoin commands irrespective of the join status held in the SMI. This solution would prevent the Response Code E080801 from being created in association with an unjoin command.

The validation of SRV8.8.1 Unjoin Service (Critical) and SRV8.8.2 Unjoin Service (Non-Critical) in DCC Request Manager will be modified to remove the check that the OtherDeviceID from the SRV is flagged in the SMI as being joined to the target Device of the SRV. The validation is contained in the strategy classes UnjoinCritical and UnjoinNonCritical. Any other validation in these strategy classes will remain unchanged.

The change will apply to SMETS1 and SMETS2, and to all versions of DUIS.

This modification does not intend to alter current Security elements of the process.

The full business requirements are in Annex B.

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

As only Suppliers and Other Users are able to send SRVs 8.8.1 and 8.8.2, SECAS believed they will be the only Parties impacted. Based on the Refinement Consultation responses; one Supplier noted they would be directly impacted; however another Supplier stated that as it is a DSP only change and no adaptor upgrade is needed, they will not be impacted. No Other Users responded to the consultation, it is unclear if they will be impacted.

Shared Resource Providers (SRPs) and Meter Installers work on behalf of Suppliers to install and send SRVs during the I&C process, therefore would be impacted.

The DCC will have to make system and internal process changes, therefore would also be impacted.

DCC System

Security Impact

This change impacts on the conduct of DCC Access Control Broker (ACB) validation checks, de-activating a current check. It does not impact the security posture of the service or its infrastructure, but, as with any change to security related code, its implementation will be security assured throughout. This assurance includes reviewing designs, test artefacts and providing consultancy to the implementation and test teams. A more detailed assessment of Security impact will be carried out as part of the full Impact Assessment. This change does not impact protective monitoring logging or configuration. As it does not impact any interfaces, a penetration test is not deemed necessary. An independent code review is not deemed necessary for this level of change.

Technical Specifications

This change will require a DUIS uplift. Note that the removal of this validation check will require a change to the DUIS documentation, but it is assumed that the related error code will remain in the DUIS schema. Therefore, this change on its own does not require a DUIS schema uplift. This will be confirmed in the DCC Impact Assessment.

Integration Impact

The modification does not introduce any changes to system integrations within the DCC Total System, as the changes to the functionality are encapsulated within the DSP component. As such, any testing executed during System Integration Testing (SIT) would be a repeat of a subset of the testing executed during PIT. Therefore, no SIT execution is proposed for this modification. It is not thought that this modification will require User Integration Testing (UIT). An element of regression testing will be carried out as part of the SEC Release that includes this change.

Infrastructure Impact

No infrastructure impact is expected from this modification. It should be noted that the aggregated impact of many such changes to the DSP solution will ultimately result in a reduction of the available processing headroom assumed as part of the original Agreement. As such, it may be necessary for DSP to raise a business-as-usual (BAU) Change Request (CR) for the provision of additional infrastructure to ensure the DCC Total System does not experience performance problems that are the direct result of the accumulation of such changes. The change does not impact the DSP resilience or Disaster Recovery implementation.

Service Impact

The changes noted above are not expected to alter traffic volumes significantly, nor to add to message processing time. No changes to Service Level Agreements (SLAs), particularly to Schedule 2.2 (Performance Measures and Reporting), or reporting are expected as a result of this change.

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

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AD 'DCC User Interface Specification'
- Schedule 11 'TS Applicability Tables'

The changes to the SEC required to deliver the Proposed Solution will be provided with the DCC Impact Assessment.

Technical specification versions

This modification will impact Appendix AD 'DCC User Interface Specification' and Schedule 11 'TS Applicability Tables'. The Business Architecture Document (BAD) & Business Architecture Model (BAM) will need to be updated following SECAS articulating the as-is and to-be processes in Annex D. The proposed changes will be made clear after the Impact Assessment is returned by the DCC; Parties will need to check how their business processes will be impacted.

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 would affect all variations of ESME, Gas Smart Metering Equipment (GSME), Gas Proxy Functions (GPF), In-Home Displays (IHD), Prepayment Meter Interface Devices (PPMID), Home Area Network Connected Auxiliary Load Control Switches (HCALCS), Consumer Access Devices (CAD) and Alternative Home Area Network (HAN) Devices, as it is set out in the DUIS that these Device types are applicable for SRV 8.8.1 and SRV 8.8.2.

Consumers

Consumers will directly benefit from this modification. The improved I&C success rate would ensure Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers.

Other industry Codes

There will be no impact on other Codes from this modification.

Greenhouse gas emissions

There is believed to be a minor decrease in greenhouse gas emissions due to Devices not needing to be replaced if they are unable to be fully commissioned.

5. Costs

DCC costs

The DCC's Service Providers have provided a rough order of magnitude (ROM) cost shown below, which describes the indicative costs to implement the functional and non-functional requirements as assumed above. The scope of supply under the DCC Preliminary Assessment includes design, development (build), system testing, and performance testing within the PIT environments.

The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£10,000 – £75,000
Systems Integration Testing (SIT)	£0
User Integration Testing (UIT)	£0
Implement to Live	TBC
Application Support	TBC

More information can be found in the DCC Preliminary Assessment response in Annex D.

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

SEC Party costs will be sought as part of this Refinement Consultation.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received on or before 2 February 2023; or
- **27 June 2024** (June 2024 SEC Release) if a decision to approve is received after 2 February 2023 but on or before 27 September 2023.

The DCC has suggested this should be included in the November 2023 SEC Release, currently this will be a challenging timescale to get a decision, but SECAS will endeavour to meet this deadline in collaboration with the DCC.

7. Assessment of the proposal

Observations on the issue

During the Development Stage, this proposal was presented to the Panel Sub-Committees and had no initial comment, however the Proposed Solution was agreed to be presented to the Technical Architecture and Business Architecture Sub-Committee (TABASC) for comment during the Refinement Process.

SECAS's views

During the Development Stage, the Smart Energy Code Administrator and Secretariat (SECAS) advised that removing any form of validation may cause potential security risks and the proposal should instead focus on the root cause of the issue and understand why the DSP has not received the response to the Join SRV.

SECAS investigated this with the Proposer during the Development Stage. The DCC commented that it is difficult to understand why the SRVs do not reach the DSP as the Suppliers are responsible for sending them rather than the DCC or the DSP. The DCC further advised that if the DSP is not aware the SRV has or hasn't been sent, it will be extremely difficult for the DSP to investigate any further.

As the manual database correction costs are socialised within Fixed Charges therefore, to implement the modification would save costs for all Suppliers and Network Parties.

Views of the Change Sub-Committee

The proposal was presented to the Change Sub-Committee (CSC) for initial comment. SECAS informed the CSC that an RFI would be issued to better understand the scale of the issue and the impact it is having. The CSC approved of this approach and provided no further comments. SECAS provided an update to the CSC including a summary of the RFI responses. CSC members were happy for the modification to proceed to the Refinement Process. No further comments were received.

Request for information responses

During the Development Stage, SECAS issued an RFI consultation to better understand the impact the issue is having on SEC Parties. SECAS received three responses to the RFI (two Large Suppliers and one Other SEC Party). Two of the three respondents stated that the issue impacts their organisation.

The respondent that was not impacted (a Large Supplier) stated that their organisation's orchestration does not rely on the unjoin being successful when removing a Device. This is because the command could be failing because the Device is faulty. They advised that the cost of any Proposed Solution developed should be compared to the number of manual corrections being requested by Users.

The second Large Supplier stated that it was supportive of the need to address the issue but is concerned as to why the DSP is not receiving the keys in the second 8F12 Alert. The DCC stated that this issue is separate as it involves the CSPs and their Alert delivery success. The Large Supplier commented that a preferred solution would be to reduce the current £2,000 cost to amend the SMI. This would allow the security protocols to remain in place. Further comments were given where the respondent was not convinced that the cost-benefits to the DCC for the proposed approach will outweigh the security benefits of the current approach. This was agreed to be investigated during the Refinement Process, but at this time the DCC did not believe there is a security risk by removing the validation.

The Other SEC Party commented that successful SR 8.7.2s are not always registered within the DSP systems, which prevents, if required, the subsequent SR 8.8.2 from succeeding. It stated that it is directly impacted when it attempts to add or remove Type 2 IHDs or CADs. It felt the need for a SEC modification to address the issue as it results in a negative customer experience as it can take a long time, possibly several weeks, for the SMI to be updated.

Refinement Consultation responses

One respondent to the Refinement Consultation queried the scenario where the Device does not join and the User tries to Unjoin, and if there was no response code. They asked how Users would know if the Device did not join and an Unjoin is attempted. SECAS noted that there will be the same response code returned as when a User sends an Unjoin for a Device that is not currently joined. The respondent also queried why this modification should go ahead as there has only been five occurrences. SECAS noted, although there are only five instances of Users requesting the manual correction by the DCC, Users have noted there are more instances of issue occurring, however no manual correction was requested.

Another respondent was supportive of the modification and considered it would be a positive change which will benefit Suppliers during I&C when problems arise with Device joins. The respondent also noted that the issue that needs this solution occurs more frequently than originally thought when the modification was raised. This was discussed with the Working Group that the frequency of issues with this is recognised as being higher than originally noted in the Modification Report and requested the report be updated to reflect this. If a Device install does stall for this reason, the process to sort it out should be smoother, which will benefit consumers who might otherwise have needed a further visit. It was also noted that this is a DSP only change, so the DSP will stop applying check and no adaptor upgrade is required. The respondent also agrees with the Proposer that this will better facilitate SEC Objective (a) (see Section 8 for more details).

Solution development

Views of the Requirements Workshop

From the responses to the RFI consultation, the Proposer advised that there have been multiple requests to manually update the SMI status, which cost £2,000 per request. Removing the unnecessary DSP validation rule would be a low impacting DUIS change that could be implemented in a maintenance release and enable Users to update the SMI themselves. The Proposer also confirmed it is only proposing to remove the DSP validation rule for the Service Requests mentioned in the problem statement, not all Service Requests.

An attendee noted that the Devices would be in each other's Device logs, so they hold the ultimate truth, whereas the DSP holds a mirror of this. However, there are occasions where the DSP's view of the Devices on the HAN is not a true reflection.

An attendee questioned if there was a reason this DSP validation was originally put in place. Attendees could not identify why this DSP validation was in place but agreed it should be removed.

Views of the Working Group

A Working Group member stated that there is no validation for a join request. The Working Group was supportive for removing the unjoin validation as it would help with stranded Devices and Device reuse.

Working Group members stated that the tracking in the SMI needs to remain, as this is used for other business needs within industry, although there are alternative ways to check the status via a Read Device Log.

The Working Group queried why within the GBCS there is no requirement for the validation of this SRV and why the current DCC implementation requires it. It was also noted that this aspect is worth investigating with the DSP, as there could be a genuine reason as to why this piece of architecture exists. The Proposer stated that initial discussion with the DSP indicated that the removal of this validation isn't something that will cross impact other parts of the DSP solution. Working Group members agreed that this modification will need to be reviewed by the Technical Architecture and Business Architecture Sub-Committee (TABASC) to ensure the removal of the response code does not have any wider implications. It was also agreed the DCC needs to confirm this if this modification progresses to the Preliminary Assessment stage.

Upon the return of the DCC Preliminary Assessment, Working Group members queried why there was no SIT or UIT. The DCC advised, for this modification there is no specific SIT or UIT, as there is no system impact. UIT would take place as part of the corresponding SEC Release and Users would be able to take part in that if they want to as usual.

Working Group members noted and agreed to progress to a Refinement Consultation and only return to the Working Group if there are any controversial responses.

Views of the TABASC

The Proposed Solution was presented to the TABASC, who was concerned about removal of the Response Code E080801 and the impacts on Parties Business Processes. SECAS provided two Process diagrams (refer to Annex C) which were circulated to the TABASC and Parties. The TABASC subsequently advised it does not see any impacts arising from the removal of the Response Code

E080801; however, it will be clearer following the DCC Preliminary Assessment and Refinement Consultation with Industry.

The Preliminary Assessment was presented to the TABASC, who noted that this change would only affect the DCC User Interface Specification (DUIS), with no impact on the CSPs. The incidence of the problem is low, at five instances so far, but they cost £2,000 each time to resolve. The TABASC agreed that the Proposed Solution was sufficient and considered that the Modification Proposal should proceed to Impact Assessment.

8. Case for change

Business case

It is envisaged that this modification will improve I&C success rates and not leave Devices stranded; therefore, Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers. This will also save the ongoing cost and effort to manually correct the SMI database to allow Users to reuse any Devices, which costs on average £2,000 per manual correction, this cost is socialised via Fixed Charges. It can take more than 12 months for any firmware fixes of meter defects to be deployed.

There have only been five instances recorded and manually corrected by the DCC between August 2020 and July 2022. This low number may be due to a possibility that Parties are exchanging stranded Devices instead of having them manually corrected by the DCC due to the cost. If this is the case, there is also an environmental impact of exchanging meters to be considered.

As the manual database correction costs are socialised within Fixed Charges, implementing the modification would save costs for all Suppliers and Network Parties over time.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that MP178 will facilitate SEC Objective (a)¹ as it will ensure efficient installation and operation of smart metering systems due to Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers.

Industry views

There were two respondents to the Refinement Consultation.

Once respondent agreed with the Proposer's views and felt the modification better facilitated SEC Objective (a). The other respondent was opposed to the modification and did not believe that the modification better facilitated any SEC Objectives. The full responses to the Refinement Consultation can be found in Annex E.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Views against the consumer areas

Improved safety and reliability

This modification will be positive against this consumer benefit area, as Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers.

Lower bills than would otherwise be the case

This modification will be positive against this consumer benefit area, as the improved I&C success rate would ensure Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers.

Reduced environmental damage

This modification will be positive against this consumer benefit area, as this would ensure Devices previously stuck in a strange state and unable to be commissioned can be saved from to be replaced with a new Device.

Improved quality of service

This modification will be positive against this consumer benefit area, as the improved I&C success rate would ensure Devices are able to be commissioned, provide smart functionality and benefits of smart features to consumers.

Benefits for society as a whole

This modification will have a neutral impact against this consumer area.

Appendix 1: Progression timetable

Following the Refinement Consultation, SECAS will be presenting this Modification Proposal for the Change Board to approve the Impact Assessment costs. This will be the final stage of the Refinement Process, after which the Modification Report can be returned to the CSC for approval to move to the Report Phase.

Timetable	
Event/Action	Date
Draft Proposal raised	15 Jul 2021
Presented to CSC for initial comment	27 Jul 2021
Problem Statement discussed with Sub-Committees	Aug 2021
Request for information issued to industry	Aug 2021
Presented to CSC for final comment and recommendations	28 Sep 2021

Timetable	
Event/Action	Date
Modification placed on hold	Oct 2021 – May 2022
Business requirements developed with Proposer	Jun 2022
Business requirements discussed at the requirements workshop	11 Jul 2022
Business Requirements discussed with Working Group	3 Aug 2022
Business requirements reworked with Proposer	Aug 2022
Modification discussed with TABASC	1 Sep 2022
Business requirements reworked with Proposer	Sep 2022
DCC Preliminary Assessment requested	23 Sep 2022
DCC Preliminary Assessment returned (expected)	21 Oct 2022
Modification discussed with Working Group	2 Nov 2022
Refinement Consultation	8 Nov – 26 Nov 2022
Modification discussed with TABASC	1 Dec 2022
<i>Impact Assessment costs approved by Change Board</i>	<i>21 Dec 2022</i>
<i>Impact Assessment requested</i>	<i>22 Dec 2022</i>
<i>Impact Assessment returned</i>	<i>3 Mar 2023</i>
<i>Modification Report approved by CSC</i>	<i>21 Mar 2023</i>
<i>Modification Report Consultation</i>	<i>27 Mar 2023 – 14 Apr 2023</i>
<i>Change Board Vote</i>	<i>26 Apr 2023</i>

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
ACB	Access Control Broker
BAD	Business Architecture Document
BAM	Business Architecture Model
BAU	Business as Usual
CAD	Consumer Access Device
CR	Change Request
CSC	Change Sub-Committee
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
ESME	Electricity Smart Metering Equipment

Glossary	
Acronym	Full term
GBCS	Great Britain Companion Specification
GPF	Gas Proxy Functions
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
HCALCS	HAN Connected Auxiliary Load Control Switch
I&C	Installation & Commission
IHD	In Home Display
PIT	Pre-Integration Testing
PPMID	Prepayment Meter Interface Device
RFI	Request for information
ROM	Rough order of magnitude
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	Service Level Agreement
SMETS	Smart Metering Equipment Technical Specifications
SMI	Smart Metering Inventory
SRV	Service Reference Variant
SR	Service Request
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integration Testing

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DP178 ‘Removing DSP validation against the SMI join status for SR8.8.x’

Annex A

Request for information responses

About this document

This document contains the full collated responses received to the DP178 request for information.

Question 1: Does the issue identified under DP178 'Removing DSP validation against the SMI join status for SR8.8.x' impact you?

Question 1			
Respondent	Category	Response	Rationale
Hildebrand technology Ltd	Other SEC Party	Yes	Successful 8.7.2 is not always registered in the DSP, preventing if required, a subsequent 8.8.2. This affects us directly as a 3rd party adding and removing our type 2 IHD/CADs.
British Gas	Large Supplier	No	Our orchestration does not rely on the unjoin being successful when removing a Device (because the command could be failing because the Device is faulty).
Octopus Energy	Large Supplier	Yes	We are supportive of the need to address the unjoin issue, but are concerned as to why the DSP is not receiving the keys in the 2nd 8F12 alert. It appears that the current volumes affected is small (we can confirm that we have had at least 5 issues). A preferred solution to maintain security protocols would be to investigate why a change to SMI incurs a £2,000 cost to DCC. If this cost was at a more sensible level, we could raise incidents to get this small volume resolved by DSP without the need for this validation change.

Question 2: Does the issue identified under this proposal warrant a modification?

Question 2			
Respondent	Category	Response	Rationale
Hildebrand technology Ltd	Other SEC Party	Yes	Currently there is a very bad experience for the Consumer as it takes weeks to get the DSP to manually update inventory to allow the 8.8.2, an extended support requirements on ourselves.
British Gas	Large Supplier	No	The cost of the modification should be compared to the number of manual corrections being requested by users. £2,000 per correction for a standard database update appears excessive given this is a repeatable update once applied once.
Octopus Energy	Large Supplier	No	This issue does need to be addressed and a solution delivered, but we're not convinced that the cost benefits to the DCC outweigh the security benefits.

MP178 ‘Removing DSP validation against the SMI join status for SR8.8.x’

Annex B

Business requirements – version 0.4

About this document

This document contains the business requirements that support the solution(s) for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	To remove the Data Service Provider (DSP) validation associated with the unjoin commands (SRV8.8.1 and SRV8.8.2) resulting in Response Code E080801
2	Update the DCC User Interface Specification (DUIS) to align with other Smart Energy Code (SEC) requirements of not mandating DSP validation of unjoin command

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

2.1.1 Background

The secure exchange of data between two Devices on the same Smart Meter Home Area Network (SMHAN) at the application layer requires pair-wise authorisation of the two Devices. The process of authorising two Devices to communicate is referred to as 'Joining' and the removal of the authorisation is referred to as 'Un-joining'. The following Service Reference Variants (SRVs) for joining and un-joining are available to DCC Users:

- 8.7.1 Join Service (Critical)
- 8.7.2 Join Service (Non-Critical)
- 8.8.1 Unjoin Service (Critical)
- 8.8.2 Unjoin Service (Non-Critical)

The DCC evaluates the responses from the Devices and tracks the status of the joining in the Smart Meter Inventory (SMI).

2.1.2 Issue

There have been cases observed where the response to the SRV 8.7.2 'Join Service (Non-Critical)' is not received by the DSP despite the join working within the Electricity Smart Metering Equipment (ESME). As a consequence, the Service User is unable to send an Unjoin command as the business validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that only Devices joined in the SMI may be un-joined.

2.1.3 Proposed solution

This solution aims to remove DSP validation of Join status in the Smart Meter Inventory (SMI) when sending an Unjoin Service Request. This will allow the sending of unjoin commands irrespective of the join status held in the SMI. This solution would suppress the Response Code E080801 from being created in association with an unjoin command.

This modification does not intend to alter current Security elements of the process.

2.2 Requirement 1: To remove the Data Service Provider (DSP) validation associated with the unjoin commands (SRV8.8.1 and SRV8.8.2) resulting in Response Code E080801

Use cases have arisen that would benefit from removing the DSP validation process, which is currently associated with the Unjoin command. The current manual workaround is costly and time consuming to update the SMI to reflect the correct status for each Device. This has led to unsatisfactory Consumer experience and costs.

A part of the Unjoin command, SRV8.8.2 validates the SMI Join relationship. The system only allows the Unjoin command (SRV8.8.x) if Devices are already joined to each other (in the SMI), otherwise the DSP will reject the Service Request with the following error code.

Response Code	Response Code Description
E080801	According to the DCC Systems Smart Metering Inventory the 'Other Device' is not joined to the BusinessTargetID Device

2.3 Requirement 2: Update the DCC User Interface Specification (DUIS) to align with other Smart Energy Code (SEC) requirements of not mandating DSP validation of unjoin command

The second requirement is about the delivery of the first requirement.

It should be noted that there is no Smart Metering Equipment Technical Specifications (SMETS), GB Companion Specification (GBCS), Security or any other SEC requirement mandating that the DSP must apply such validation other than what is defined in the DUIS Section 3.8.111.3 and 3.8.112.3. Therefore, this area of the SEC needs to be updated if this solution is approved.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
DSP	Data Services Provider
DUIS	DCC Users Interface Specification
GBCS	GB Companion Specification
ESME	Electricity Smart Metering Equipment
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications
SMHAN	smart meter Home Area Network
SMI	Smart Metering Inventory
SR	Service Request
SRV	Service Reference Variant

SEC Modification Proposal, SECMP0178, DCC CR4837

Removing DSP Validation against the Smart Metering Inventory (SMI) Join Status for SR8.8.x

Full Impact Assessment (FIA)

Version:

0.2

Date:

1st March, 2023

Author:

DCC

Classification:

Public

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1 Executive Summary

The Change Board are asked to approve:

- Total cost to implement SECMP0178 of £40,404, which comprises:
 - £39,055 in Design, Build and PIT costs
 - £1,349 in release costs (SIT, UIT and Implementation)
- A timescale to complete the implementation of three months
- Include SECMP0178 in the June 2024 SEC Release

Problem Statement and Solution

During the Install and Commissioning (I&C) process, an engineer installs Devices and a Communications Hub (Comms Hub). An engineer will commission an Electricity Smart Metering Equipment (ESME) by sending a series of Join Commands, Service Reference Variants (SRV) 8.7.x for Devices to connect to the Comms Hub, but there may be cases where the response to the SRV 8.7.2 'Join Service (Non-Critical)' is not received by the DSP despite the join working within the ESME. Hence, the Service User is unable to send an Unjoin command as the business validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that only Devices joined in the SMI may be un-joined. In these cases, the engineer will need to unjoin the Devices before attempting to re-join again.

Modification Benefits

The solution will remove DSP validation of Join status in the SMI when sending an Unjoin Service Request, which will allow the sending of unjoin commands irrespective of the join status held in the SMI, and will prevent the Response Code E080801 from being created in association with an unjoin command.

Implementing this solution will reduce the number of I&C failures, and remove ongoing costs to manually correct the SMI database to allow Users to reuse any Devices.

If the issue is left unresolved, more Devices will not be commissioned and will therefore not provide smart functionality and the benefits of smart features to consumers.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
28/02/2023	0.1	Initial compilation
01/03/2023	0.2	DCC review completed

2.2 Associated Documents

This document is associated with the following documents:

#	Title and Originator's Reference	Source	Issue Date
1	MP178-Modification-Report-v0.6	SECAS	24/08/2022
2	MP178-Business-Requirements-v0.4	SECAS	24/08/2022
3	SECMP0178 CR4837 - PIA - Remove Validation against SMI join SR8.8.x v0.21	DCC	24/10/2022

2.3 Document Information

The Proposer for this Modification is David Walsh of the Data and Communications Company. The Modification was raised by SEC in July 2021.

The Preliminary Impact Assessment (PIA) was requested of DCC on 3rd October 2022, and published on 21st October 2022.

This FIA was requested by SECAS on 9th January, 2023.

3 Solution Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The problem statement and requirements have been provided by SECAS, the Proposer, and the Working Group.

3.1 Current Arrangements

It has been reported by Suppliers that the on-site Install and Commission (I&C) process for Devices can fail where the DSP does not receive successful messages for joins of SRVs 8.7.x, such as problems joining a Consumer Access Device (CAD) to Electricity Smart Metering Equipment (ESME). When this occurs, currently, the only way to complete the I&C process is a manual update of the Smart Metering Inventory (SMI) because:

- it is not possible to continue the I&C process by retrying the join
- there have been instances where the Device will reject the retry of the Join Command (SRV8.7.x) if a previous join was already successfully completed

3.2 Problem and Context

The secure exchange of data between two Devices on the same Smart Meter Home Area Network (SMHAN) at the application layer requires pair-wise authorisation of the two Devices. The process of authorising two Devices to communicate is referred to as 'Joining' and the removal of the authorisation is referred to as 'Un-joining'. The following SRVs for joining and un-joining are available to DCC Users:

- 8.7.1 Join Service (Critical)
- 8.7.2 Join Service (Non-Critical)
- 8.8.1 Unjoin Service (Critical)
- 8.8.2 Unjoin Service (Non-Critical)

The DCC evaluates the responses from the Devices and tracks the status of the joining in the Smart Meter Inventory (SMI).

An issue has been brought to the DCC's attention whereby the on-site I&C process fails when the Data Service Provider (DSP) does not receive successful messages for joins of Service Reference Variants (SRVs) 8.7.x. This prevents the Service User from being able to send an Unjoin command as the business validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that a Device is joined to the Smart Metering Inventory (SMI) to allow it to be un-joined. For example, there may be problems joining a Consumer Access Device (CAD) to Electricity Smart Metering Equipment (ESME).

In these cases, the only way to complete the I&C process is a manual update of the SMI. This is completed by the DCC at a significant cost per update. This is because:

- it is not possible to continue the I&C process by retrying the Join; and/or
- there have been instances where the Device will reject the retry of the Join command (SR8.7.x) if a previous Join was already successfully completed.

In the 12 months after August 2020 there were four cases (across different Suppliers) where the response to the SRV 8.7.2 'Join Service (Non-Critical)' was not received by the DSP despite the join working within the ESME. Hence, the Service User is unable to send an Unjoin command as the business validation on the SRV 8.8.1 'Unjoin Service (Critical)' or 8.8.2 'Unjoin Service (Non-Critical)' commands check that only Devices joined in the SMI may be un-joined. Note that SRV 8.8.1 is used with Critical commands, while SRV 8.8.2 is used with non-Critical commands.

There are instances where if the Service User sends SR 8.7.2 again to the ESME then this will pass through the DSP, but it is then rejected at the ESME as it is already joined. Smart Energy Code (SEC) Schedule 8 'GB Companion Specification' (GBCS) mandates that Devices should accept a re-send of the SR 8.7.x 'Join Service' command, even if the Device is already joined (for example, it is already in the Device Log).

The DSP currently updates the SMI and sets up the join relationship depending on the response to the Join command. As part of the Unjoin command, SRV 8.8.2 validates the SMI join relationship. For example, the system only allows the Unjoin command (SR 8.8.x) if Devices are already joined to each other, otherwise the DSP will reject the Service Request with the following error code:

Response Code	Response Code Description
E080801	According to the SMI the 'Other Device' is not joined to the Business TargetID Device

There are no Smart Metering Technical Specifications (SMETS), GBCS, Security or any other SEC requirement mandating that the DSP must apply such validation other than what is defined in the DCC User Interface Specification (DUIS).

3.3 Impact of the Issue

If the issue identified under this proposal is not addressed, there will be:

- further I&C failures
- an ongoing cost to manually correct the SMI database to allow Users to reuse any Devices.

Each manual database correction has a significant charge to the DCC and any firmware fixes of meter defects normally take more than 12 months to deploy.

Up to July 2022 there has been five known incidences, and further incidents are expected.

If the issue is left unresolved, more Devices will not have been commissioned and will therefore not provide smart functionality and the benefits of smart features to consumers.

3.4 Business Requirements

The business requirements are as follows.

Requirement 1: Remove the DSP validation associated with the unjoin commands (SRV8.8.1 and SRV8.8.2) resulting in Response Code E080801

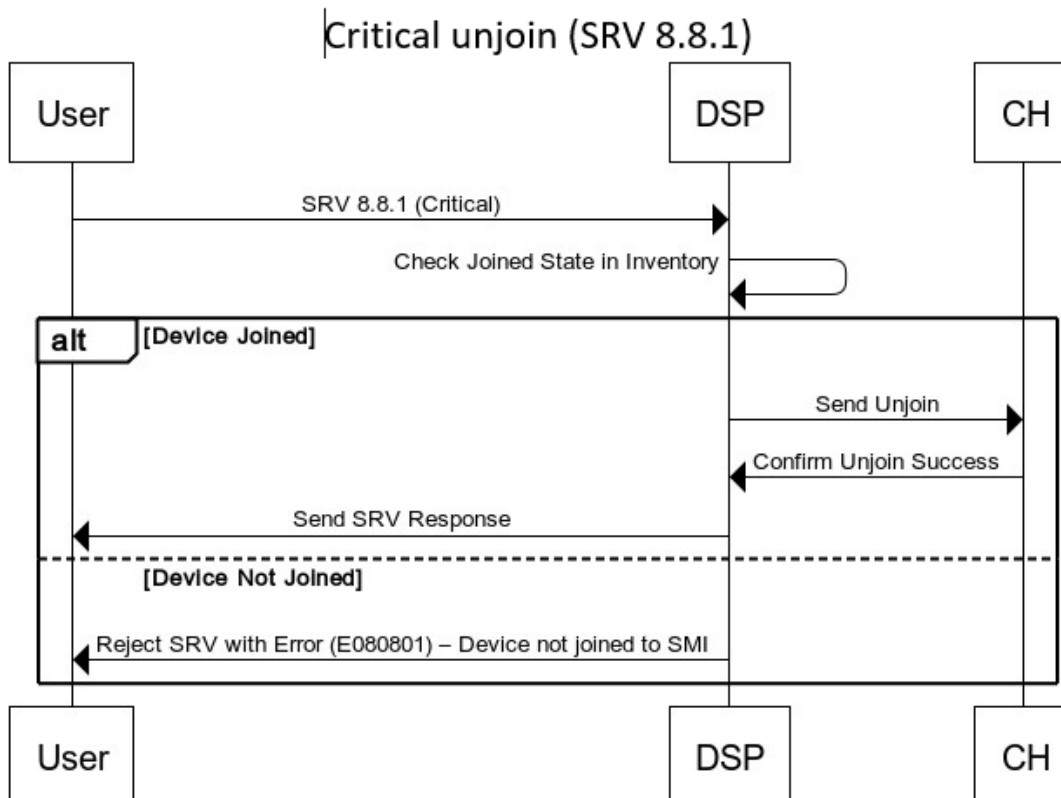
Use cases have arisen that would benefit from removing the DSP validation process, which is currently associated with the Unjoin command. The current manual workaround is costly and time consuming to update the SMI to reflect the correct status for each Device. This has led to unsatisfactory Consumer experience and costs.

A part of the Unjoin command, SRV8.8.2 validates the SMI Join relationship. The system only allows the Unjoin command (SRV8.8.x) if Devices are already joined to each other (in the SMI), otherwise the DSP will reject the Service Request with the error code: E080801.

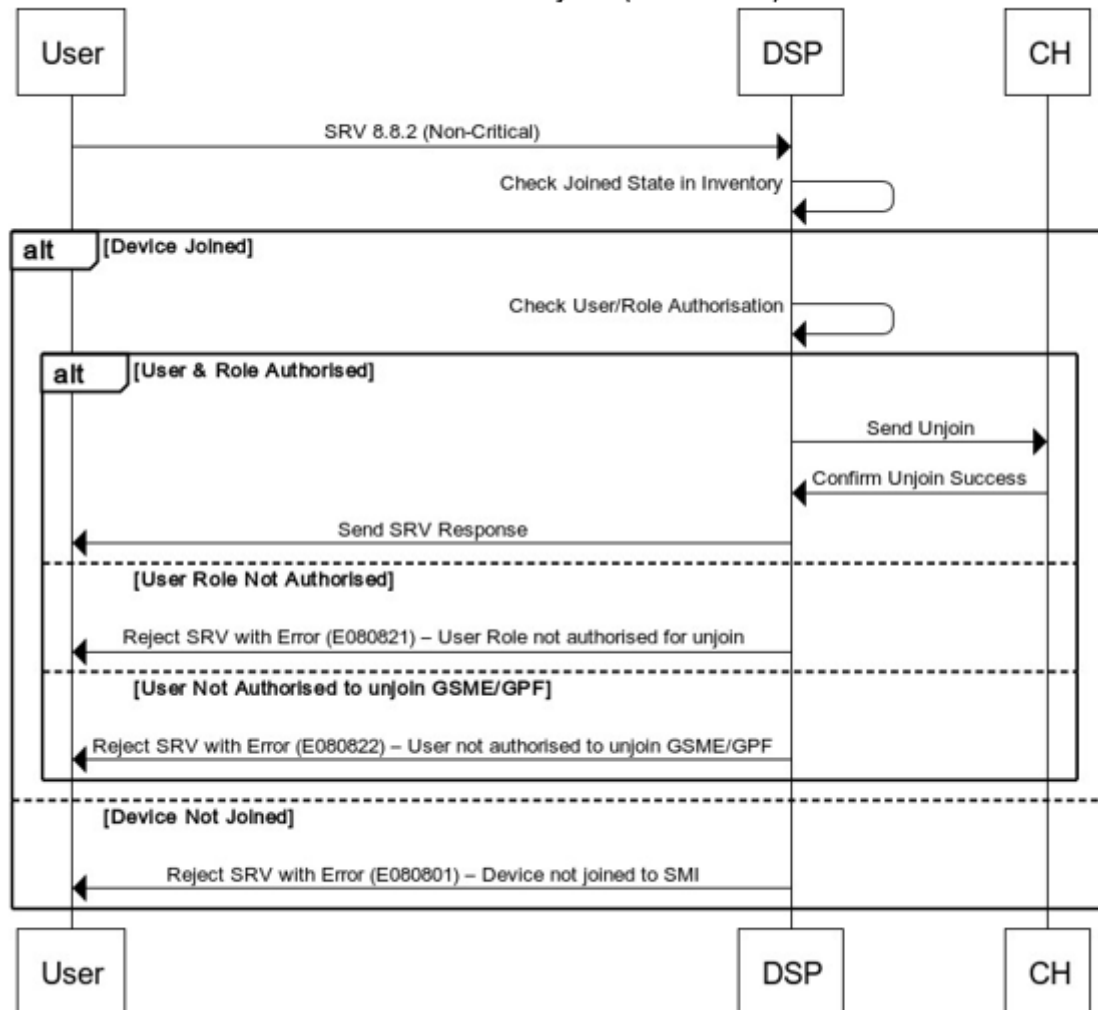
Requirement 2: Update the DCC User Interface Specification (DUIS) to align with other Smart Energy Code (SEC) requirements of not mandating DSP validation of unjoin command

This requirement defines the delivery mechanism.

Process diagrams for the Unjoin commands are shown following.



Non-Critical unjoin (SRV 8.8.2)



4 Solution Overview

DSP will modify the validation of SRV 8.8.1 Unjoin Service (Critical) and SRV 8.8.2 Unjoin Service (Non-Critical) to remove the check that the OtherDeviceID from the SRV is flagged in the SMI as being joined to the target Device of the SRV.

4.1 Functional and Technical Solution Changes

The solution for this Modification requires changes to the following components:

4.1.1 Request Manager

Remove the check that the OtherDeviceID from the SRV is already joined to the target Device of the SRV (subject to feature switch).

4.1.2 Data Management

On processing a successful Unjoin response from the device, the Join record in the database is removed. This removal will be amended to tolerate no record being present to be removed.

4.1.3 DUIS and DUGIDS Technical Specifications

The change will apply to SMETS1 and SMETS2, and to all versions of DUIS. The removal of this validation check will require a change to the documentation, but the related error code will remain in the DUIS schema. Therefore, this change on its own does not require a DUIS schema uplift.

A change will be made to update Annex 8 of DUGIDS to remove the validation check E080801 from SRVs 8.8.1 and 8.8.2. No updates to the DUIS schema will be made as a result of this documentation change.

4.1.4 Other Impacted Components

There will be no impacts to:

- Performance
- Infrastructure
- Security, including penetration testing
- Disaster Recovery

5 Testing Considerations

This Full Impact Assessment includes the cost to develop, fully test and deliver this Modification.

5.1 Pre-Integration Testing (PIT)

The DSP PIT team will design and implement the functional updates required to the DSP for the change, and will test to ensure DSP functionality aligns with the solution described in this FIA

PIT testing will include testing both existing updated DSP Use Cases, and new Use Cases development for this change. A series of regression tests will also be run. Once PIT Complete status is achieved, the PIT team will support post PIT activities in the form of technical support and defect fixes to allow DSP to achieve its test exit obligations.

The updates to the DSP system and the timing of the PIT exit will be agreed with the DCC through updates, submission and review of the Solution Design documents.

5.2 System Integration Testing (SIT)

There is no System Integration Testing required, as the change is within a single component within the DCC Total System. A small amount of required System Regression testing will be required which will be covered by a Release CR for the selected SEC Release.

5.3 User Integration Testing (UIT)

A small amount of required System Regression testing will be required which will be covered by a Release CR for the selected SEC Release.

6 Implementation Timescales and Releases

This Modification is expected to be included in a SEC Release in June 2024. Implementation timescales will be finalised as part of the relevant SEC Release.

6.1 Change Lead Times and Timelines

From the date of approval (in accordance with Section D9 of the SEC), to implement Design, Build and PIT requires a lead time of approximately **three months**.

This Modification would be scheduled alongside other Modifications and CRs, and there might be a period of no activity for this Modification.

6.2 SEC Release Allocation and Other Code Impacts

This Modification is expected to be implemented as part of the June 2024 SEC Release, however the allocation to a release may be dependent on other Modification timings and the suitability of a release. No functionality overlap with other Modifications has been identified at the time of undertaking this FIA.

6.3 Costs and Charges

This section indicates the quote for all phases of application development stage for this Modification. Note these costs assume a release of just this SEC Modification without any other Modifications or Change Requests in the release, which is not truly reflective of what the post-PIT test costs or programme duration will look like. A calculation of those costs will be carried out when the contents of the future Release are finalised, and the post-PIT costs determined through a "Release CR" also referred to as a "Post-PIT CR".

£	Design, Build, and PIT	Integration Testing, SIT and UIT	TTO	Total
SECMP0178	£39,055	£0	£1,349	£40,404

Design	The production of detailed System and Service designs to deliver all new requirements.
Build	The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented.
Pre-Integration Testing (PIT)	Each Service Provider tests their own solution to agreed standards in isolation of other Service Providers. This is assured by DCC.
Systems Integration Testing (SIT)	All the Service Provider's PIT-complete solutions for a Release are brought together and tested as an integrated solution, ensuring all SP solutions align and operate as an end-to-end solution.
User Integration Testing (UIT)	Users are provided with an opportunity to run a range of pre-specified tests in relation to the relevant change.
Implementation to Live (TTO)	The solution is implemented into production environments and made ready for use by Users as part of a live service.

6.4 Changes to the Contract

The DSP contract updates will be detailed within the CAN and will impact the following schedules:

- Schedule 2.1 (DCC Requirements): addition of new requirements for this change
- Schedule 4.1 (Contractor Solution): solution design documents
- Schedule 6.1 (Implementation Planning): addition of new milestones
- Schedule 7.1 (Charges and Payment): revisions to incorporate charges and payment

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
BaU, BAU	Business As Usual
CAD	Consumer Access Device
CAN	Contract Amendment Note
Comms Hub	Communications Hub
CR	DCC Change Request
DCC	Data Communications Company
DSP	Data Service Provider
DUGIDS	DCC User Gateway Design Specification
DUIS	DCC User Interface Specification
ESME	Electricity Smart Metering Equipment
FIA	Full Impact Assessment
GBCS	Great Britain Companion Specification
I&C	Install and Commissioning
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
RAID	Risks, Assumptions, Issues, and Dependencies
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	Service Level Agreement
SMETS	Smart Metering Equipment Technical Specification
SMHAN	Smart Meter Home Area Network
SMI	Smart Metering Inventory
SR	Service Request
SRV	Service Request Variant
UIT	User Integration Testing

Appendix B: Assumptions

SECMP178-A1	The error code E080801, which is being removed from DUGIDS, will remain in the DUIS schema.
SECMP178-A2	System Regression testing for both SIT and UIT will be covered by the future post-PIT CR for the June 2024 SEC System Release (subject to agreement between the Parties).
SECMP178-A3	There will be no integration testing of the solution in the SIT environments on the basis that these would be a repeat of the testing carried out in PIT, which would not offer value for money for DCC.
SECMP178-A4	There will be no integration testing of the solution in the UIT environments on the basis that these would be a repeat of the testing carried out in PIT, which would not offer value for money for DCC.

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MP178 ‘Removing DSP validation against the SMI join status for SR8.8.x’

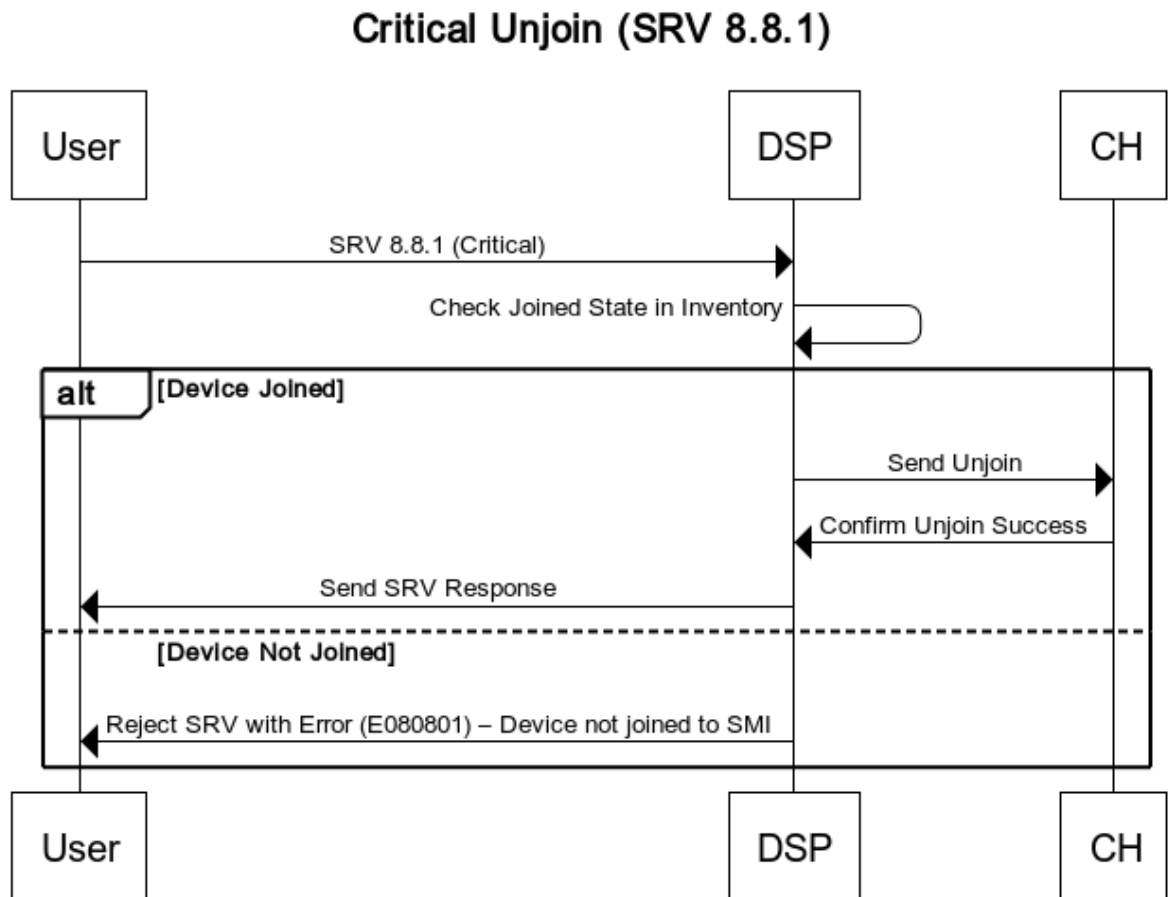
Annex D

Process flow diagrams

About this document

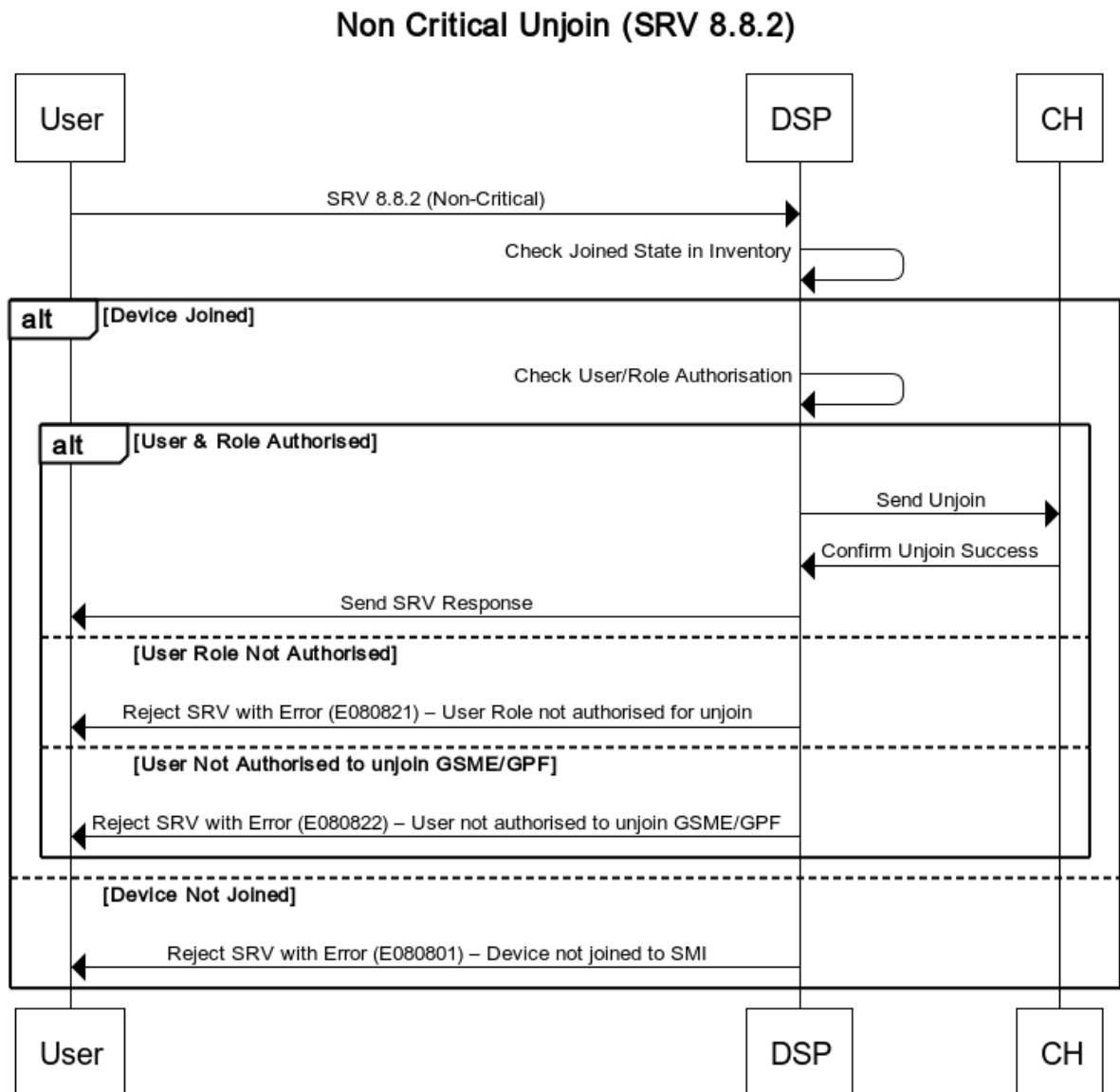
This document contains process flow diagrams relating to this Modification.

Critical Unjoin (SRV 8.8.1)



www.websequencediagrams.com

Non Critical Unjoin (SRV 8.8.2)



www.websequencediagrams.com

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MP178 ‘Removing DSP validation against the SMI join status for SR8.8.x’

Annex E

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP178 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	No	Although we have no issues with the validation being removed, we do have concerns around when the join doesn't work. In the description it states that there have been instances where the response to the SRV 8.7.2 'Join Service (Non-Critical)' is not received by the DSP despite the join working within the ESME and the SU is unable to send an Unjoin command as only joined devices can be Unjoined, but what if the device doesn't actually join and the SU tries to Unjoin? Will there be no response code to advise of this? response code to advise of this? There have also only been 5 instances of this occurring.	There will be an error code returned as per the current process when a User sends an Unjoin for a Device that is not currently Joined. Although there are only five instances of Users requesting the manual correction by the DCC, Users have noted there are more instances of issue occurring, however no manual correction was requested.
British Gas	Large Supplier	Yes	We are supportive of this modification. It's a positive change that will benefit Suppliers during I&C when problems arise with device joins The problems that need this solution are more frequent than originally thought when the Mod was raised.	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Yes	-	-
British Gas	Large Supplier	Yes	Seems sensible	-

Question 3: Will there be any impact on your organisation to implement MP178?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Yes	How will we know if the device didn't join and an Unjoin is attempted?	Same as the current process of when a User sends a Unjoin and the Device is not joined.
British Gas	Large Supplier	No	This is a DSP only change so DSP will stop applying check/logic. No adaptor upgrade is required.	-

Question 4: Will your organisation incur any costs in implementing MP178?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	-	Unknown	-
British Gas	Large Supplier	No	See above answer to Question 3	-

Question 5: How long from the point of approval would your organisation need to implement MP178?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Immediately	.	-
British Gas	Large Supplier	-	None	-

Question 6: Do you believe that MP178 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	No	See answer to Q1	-
British Gas	Large Supplier	Yes	We agree with the proposer that this will better facilitate SEC Objective (a).	-

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP178 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	No	The number of occurrences is so minimal.	Although there are only five instances of Users requesting the manual correction by the DCC, Users have noted there are more instances of issue occurring, however no manual correction was requested.
British Gas	Large Supplier	Yes	If an install does stall for this reason, the process to sort it out should be smoother, which will benefit customers who might otherwise have needed a further visit.	-

Question 8: Noting the costs and benefits of this modification, do you believe MP178 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	No	The number of occurrences is so minimal we do not believe that the benefit outweighs the cost.	-
British Gas	Large Supplier	Yes	Yes, subject to checking costs (in the Final Impact Assessment), although costs should be reasonable, as it is only a DSP change. The revised solution should be much more workable than originally scoped.	-

Question 9: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
OVO Energy	Large Supplier	-	-
British Gas	Large Supplier	We believe from Working Group discussions that the frequency of issues with this is recognised as being higher than originally in the Mod Report. Can the Mod Report be updated to reflect this, as on first reading it seems that the issues are so infrequent that a resolution shouldn't be required.	SECAS has updated the modification report to reflect this.