

SEC Modification Proposal, SECMP0252, DCC CR5414, CR5425

Amending the Process for Communications Hub Returns

Preliminary Impact Assessment (PIA)

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Contents

1	Executive Summary	4
2	Document History	5
2.1	Revision History	5
2.2	Associated Documents	5
2.3	Document Information.....	5
3	Context and Requirements	6
3.1	Context	6
3.2	What is the Issue?	6
3.3	Impact of the Issue	6
3.4	Business Requirements	7
3.5	Business Use Case.....	9
3.6	Out of Scope	9
4	Description of Solution	11
4.1	Solution Option A; CSP Upload	11
4.1.1	DSP Changes (A).....	11
4.1.2	CSP Changes (A).....	12
4.1.3	Accenture Device Manager Changes (A)	12
4.2	Solution Option B; DCC Upload.....	12
4.2.1	DSP Changes (B).....	12
4.2.2	Other Service Providers (B)	13
4.2.3	Process Impacts (B).....	13
4.3	Other System Impacts	13
4.3.1	(Data Science and Analytics) Reporting	13
4.3.2	Security Impact	13
4.3.3	DSP Service Impact	14
4.3.4	Infrastructure Impact	14
5	Implementation Timescales and Approach.....	15
5.1	Pre-Integration Testing.....	15
5.2	System Integration Testing	15
5.3	User Integration Testing.....	15
6	Costs and Charges.....	16
6.1	Design, Build and Pre-Integration Testing Cost Impact.....	16
6.2	Contract and Schedule Impacts.....	16
	Appendix A: Glossary	17

Appendix B: RAID	18
Appendix C: Draft Process for Alternative Returns of Communications Hubs	18

1 Executive Summary

Two Solution Options are presented in this document, and DCC is recommending the Change Board to approve Solution Option B as follows:

- Total cost to complete the Full Impact Assessment of **£17,636**.
- The timescales to complete the Full Impact Assessment of 40 working days.
- ROM costs for SECMP0252, up to the end of Pre-Integration Testing (PIT) of £200,000 to £300,000

Problem Statement and Solution

The SEC details the requirements and obligations to enable Parties to return Communication Hubs where a problem is identified prior to installation or after installation and subsequent removal. To return a Communications Hub (Comms Hub), the Party must send a Service Reference Variant (SRV) for each Comms Hub they want to return to the Data Communications Company (DCC), the Comms Hub must in a set state, and only the Responsible Supplier can return Comms Hubs.

The DCC has identified over 65,000 Comms Hubs which are 'not on the wall' and are in the possession of non-Responsible Parties which means that Party is unable to decommission the Comms Hub or identify the Responsible Supplier. A DCC Returns Workshop and the DCC Supply Chain Working Group provided feedback from industry of issues within the whole process. A new process to address issues now and for the future is required.

Such Comms Hubs in warehouses incur ever increasing storage costs, and Parties unable to meet Service Level Agreements (SLA) are financially impacted.

Modification Benefits

This Modification provides an alternative method to allow SEC Parties, including non-responsible Parties, to return any Comms Hubs to the DCC in any state, and provides the DCC Service Providers with the ability to deal with that return.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
26/07/2024	0.1	Initial version, for DCC internal review
2/08/2024	0.2	Included further solution option
6/08/2024	0.25	DCC review complete

2.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	DP252 Modification Report v0.2	SECAS	5/07/2024
2.	MP252 Business Requirements v0.5	SECAS	2/07/2024

References are shown in this format, [1].

2.3 Document Information

The Proposer for this Modification is David Lane from SMS PLC. The Modification was raised on October 5th, 2023.

The Preliminary Impact Assessment (PIA) was requested of DCC on 18th July 2024.

3 Context and Requirements

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

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

3.1 Context

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 or being held in storage prior to installation. The DCC provides a returns process for Comms Hubs allowing for triage, refurbishment, and reissue while the Comms Hub can either be returned without ever being installed at a property or following a removal. To return a Comms Hub, the Party must send an SRV for each Comms Hub they want to return. In order for the SRVs to complete, each SRV must originate from the Responsible Supplier and the Comms Hub status must be either be 'Decommissioned' in the Smart Metering Inventory (SMI) if it has been installed previously, or returned prior to installation.¹ The commands are SRV 8.14.3 (CommsHubStatusUpdate-FaultReturn) and SRV 8.14.4 (CommsHubStatusUpdate-NoFaultReturn). The criteria state the only Eligible Users which are Import Suppliers, Gas Suppliers, and Registered Supplier Agents (RSA) can return Comms Hubs.

If the Party is not the Responsible Supplier that SRV is rejected, and the Party cannot identify the Responsible Supplier.

3.2 What is the Issue?

DCC has identified over 65,000 Comms Hubs which are 'not on the wall' and are in the possession of non-Responsible Parties. The ownership of a Comms Hub is defined as Confidential Information, which the DCC is therefore precluded from disclosing. This is likely an oversight from when the SEC was drafted, however, the prohibition is clear.

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 with 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 has suggested the volume of Comms Hubs will continue to increase and likely at an accelerated rate once there is a move into the 4G Comms Hubs. In terms of the point of transition to 4G Comms Hubs in 2025, the DCC suggest they expect c.200-300,000 Communications Hubs to be surplus to requirements.

3.3 Impact of the Issue

Where the Party in possession of the Comms Hubs is not the Responsible Supplier and the Comms Hub is not "Decommissioned" these Comms Hubs cannot be included in triage, refurbishment, redeployment, or secure disposal. This also means there are incorrect charges placed on Suppliers for Comms Hubs no longer at a consumer's premises, nor in

¹ 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 Comms Hubs.

the Supplier's possession. A further complication is that due to the age of some of these stranded Comms 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.

Comms Hubs in non-responsible Parties' possession are taking up space in their warehouses and incurring ever increasing storage costs. Where they are unable to meet the Service Level Agreement (SLA), there is a financial impact for the Party in possession of the Comms Hub, the Responsible Supplier and indirectly, consumers.

The SEC would need to be amended to provide the DCC with the authority to provide the Responsible Supplier information to other parties and the DCC Total System significantly updated to follow this path.

3.4 Business Requirements

This solution will be applicable to all SMETS2+ Comms Hubs. It will not replace the current Comms Hubs returns process, but will be an additional route for Comms Hubs to be returned. Guidance on returning Comms Hubs previously has been developed and approved by the Security Sub-Committee (SSC) in conjunction with industry and any returns of Comms Hubs must comply with this guidance.

The business requirements are as follows.

Ref.	Requirement	MoSCoW Rating
1	The DCC shall develop a mechanism whereby SEC Parties, including non-responsible Parties, shall notify DCC when they want to return Communications Hubs	M
2	The DCC shall develop a mechanism to allow non-responsible Parties to return Comms Hubs, where the Comms Hub state in the (SMI) is 'Commissioned' or 'InstalledNotCommissioned'	M
3	The DCC shall develop a mechanism to check all notified Comms Hubs returns for their current SMI state	M
4	The DCC shall notify SEC Parties whether their request for Comms Hubs return has been accepted or rejected	M
5	The DCC shall notify the responsible Party of Comms Hubs in the returns process that the DCC has in their possession	M
6	The DCC shall process the accepted Comms Hubs	M
7	The DCC shall develop a mechanism to investigate and charge the responsible Party for the non-compliant returned Comms Hubs	M
8	The DCC shall accept the return of end-of-life Comms Hubs	S
9	The DCC shall develop and provide regular reporting to monitor Comms Hub returns data	S

Note that some of these requirements, and some parts of the requirements, are not DCC Total System impacting, but still require a changed returns process. A draft version of the process is shown in Appendix C of this document. These process changes will be implemented by DCC, and those costs and efforts will be covered as Business as Usual.

For **Requirement 1**, SEC Parties can often be in possession of Comms Hubs that have not been decommissioned correctly, and that they are not the current responsible Party for the Comms Hubs. One such scenario is when a Change of Supplier (CoS) process has failed to change the responsible Party, or a current Supplier fails to decommission at point of Comms Hubs removal and subsequently, the Consumer proceeds with a CoS.

The DCC will design a mechanism for SEC Parties to notify the DCC of the Comms Hubs they want to be returned. This notification should have relevant fields to account for how many Comms Hubs will be listed for return and to specify at least the:

- Global Unique Identifier (GUID)
- make and model of any such Comms Hubs
- region of the Comms Hubs

As part of **Requirement 2**, the DCC will need to design a mechanism, or use an appropriate existing mechanism, for Non-Responsible Parties, to return Communications Hubs with SMI states of 'Commissioned' or 'InstalledNotCommissioned'. Currently all SEC Parties are able to return Comms Hubs with SMI state of 'Decommissioned'.

For **Requirement 3**, the DCC will perform a validation check to ensure the Communications Hubs intended for return are in the correct SMI state.

Accepted SMI states are 'Commissioned', 'Decommissioned' or 'InstalledNotCommissioned', whereby those in a 'Pending' state would require explicit permissions by the DCC before being accepted for return. This validation is to denote what the current SMI state of all Comms Hubs which SEC Parties have notified intention to return. The possible Comms Hubs SMI states are 'Pending', 'Commissioned', 'Decommissioned' or 'InstalledNotCommissioned'.

The purpose of checking the current SMI state is to prevent any unnecessary returns of Comms Hubs to the DCC. There are instances where a Comms Hub may still be in the 'Pending' state and without any physical damage. Such Comms Hubs can be redeployed without having to return to the DCC.

DCC will respond by accepting or rejecting all SEC Parties requesting the return of Comms Hubs to meet **Requirement 4**:

- Accepted shall mean that the request will be fulfilled with no amendments to the information provided
- Rejected shall mean that the request requires amendment prior to acceptance

Where a request has been rejected, the DCC shall set out the reasons why the request has been rejected (e.g. invalid GUID provided or too large a quantity of Comms Hubs in a single return request for the region). The SEC Party could then send an amended notification in accordance with Business Requirement 1.

To meet **Requirement 5**, the DCC must notify the Responsible Party of the status of returned Comms Hubs after they have been processed by the DCC, and advise which were successfully processed for reuse and which will be recycled.

Although **Requirement 6** indicates the need to allow Responsible Parties to return Comms Hubs that have not been decommissioned by the installing Party, the Modification is only a

fix for cases where Parties have not followed the correct process. DCC will issue guidance with this Modification stressing the importance that Parties should follow correct process, and not require the manual processes that will be implemented as part of this Modification.

Requirement 8, “The DCC shall accept the return of end-of-life Comms Hubs”, will enable SEC Parties to return Communications Hubs to the DCC during transitional phases. This requirement is a “Should” requirement, as when a Comms Hub does reach end-of-life, they would need to be returned to the DCC. However currently, there is no finalised plan of what SEC Parties are to do with any end-of-life Comms Hubs.

Requirement 9 will allow SEC Parties to see where their returned Comms Hubs are in the process. The reporting is to only include two stages; one upon receipt by the SMETS 2 Communications Service Providers (CSP) of each Comms Hub and another once triage is completed. This is a “Should” requirement, as the DCC has noted there is potential to increase a current Comms Hubs returns report in frequency which should suffice.

3.5 Business Use Case

Any DCC User can return a Comms Hub to the DCC. However, the issue is the system state when they are returned, and this Modification will allow DCC to align systems and bill the responsible supplier.

One Use Case follows this route:

1. Supplier A installs a Comms Hub, ESME, and GSME for a customer
2. Customer switches from Supplier A to Supplier B
3. Supplier B contracts to RSA C for removal of the devices
4. RSA C remove the devices without decommissioning (because they cannot)
5. Comms Hub returned to RSA C warehouse
6. RSA C return the Comms Hub to DCC (CSP) and informs the DSP
7. DCC/CSP would place on the bench and request unlock
8. DSP would issue an unlock
9. Comms Hub outcome either disposal or refurbishment; if refurbishment, Comms Hub is put back into circulation
10. DCC review the last time the Comms Hub communicated and the Responsible Supplier
11. DCC ensure billing aligns with that customer.

3.6 Out of Scope

DCC are aware that in many cases, Comms Hubs are returned with the ESME or GSME still associated as part of an incorrectly applied business process. The only way to remove the association with the Comms Hub is to send SR8.3 Decommission for the ESME or GSME device. If as part of the decommission process, Service Users are not sending SR8.3 Decommission for the ESME and/or GSME devices then those devices remain associated

with the Comms Hub, even if this Modification attempts to execute a decommission for the Comms Hub.

The issue cannot be identified by the CSPs supplying the refurbished Comms Hubs, and only surfaces when installing Parties try to use such refurbished Comms Hubs.

DCC have committed to implementing a small Change Request such that when a CSP submit an Advanced Shipping Notification (ASN), the DSP will check for associated devices, and remove any such association. This activity will be carried out as part of a future DSP Maintenance Release, and is not part of the scope for this Modification.

4 Description of Solution

The aim of the solution is to allow Suppliers to return decommissioned Comms Hubs, even when they are not in the decommissioned state in the SMI. These options are intended to augment the existing processes using SRVs 8.14.3 or 8.14.4 and SR8.3 and functionality currently used by Parties, specifically allowing Parties who are not the Responsible Supplier to return Comms Hubs.

There are two potential solution options that have been considered:

- Solution Option A; CSP Upload
- Solution Option B: DCC Upload

DSP have indicated that the option chosen for implementation could be controlled by a feature switch, but this will be investigated at the Full Impact Assessment (FIA) stage.

4.1 Solution Option A; CSP Upload

With this option, there is no change from the existing process where Parties return the Comms Hubs to the DCC, i.e., the CSPs. The solution will require changes to the N4 Automated Programming Interface (API) detailed following which will in turn require changes at the DSP and CSPs.

4.1.1 DSP Changes (A)

The extent of the DSP changes for this Solution Option are:

- DSP shall provide an interface via the CSP Management Gateway for the CSP (and potentially in future the Accenture Device Manager (4G devices)) to notify the DSP of a Comms Hub which has been returned; and
- upon notification of a Comms Hub being returned via this interface, the DSP shall set the status of the CHF (Comms Hub Function) and its associated GPF (Gas Proxy Function) to “decommissioned.”

The CSP Management Gateway interfaces with CSP South and Central plus CSP North will be amended to support the status of “RETURNED” within the N4 API (as defined in Interface specifications SD4.4.3, SD4.4.4 and SD4.4.11). Processing of this N4 API will set the CHF and its associated GPF to “decommissioned”, which will enable a subsequent CH unlock request to be processed.

Where the N4 API status is “RETURNED”, this will introduce new:

- validation and response – to check the details of the device against the SMI state. The DSP will provide a response to the submitting Party, listing the valid identifiers.
- processing –
 - i. to update the CH Logistics status to “RETURNED”;
 - ii. to update the CHF (and its GPF) to “decommissioned” and to undertake the deletion of any schedules or DSP Future Dated requests for those devices.

Where the N4 API status is set to “RETURNED”, the corresponding CSP will receive updates. A draft description of the updates to the N4 API within the CSP Management Gateway Interface Specification is included following.



CR5414 CSP
Management API char

4.1.2 CSP Changes (A)

Changes to the Management Gateway interfaces with CSP South and Central plus CSP North will be amended to support the status of “RETURNED”. This will require changes in the Backend Systems of both CSPs, as well as potentially internal process changes for each CSP.

4.1.3 Accenture Device Manager Changes (A)

Although the 4G Comms Hubs, which will be provided as part of the Network Evolution programme, are not intended to be in scope for this Modification, if there is ever any intention to extend the CSP Upload solution option to include these newer Comms Hub, changes will be needed in the Device Manager component. As the N4 API is not currently available to Accenture Device Manager this would need to be added to the Interface specification SD4.4.11. These changes are not included in the section 6 Costs.

4.2 Solution Option B; DCC Upload

With this solution, Parties can supply a list of devices for the DCC to process. Note this is not intended to replace existing processes, rather augment them.

4.2.1 DSP Changes (B)

The extent of the DSP changes for this Solution Option are:

- DSP shall provide an interface via the Self Service Management Interface (SSMI) for the DCC to notify the DSP of a Comms Hub to be returned; and
- upon notification of a Comms Hub being returned via this interface, the DSP shall set the status of the CHF and its associated GPF to “decommissioned”.

A new upload screen will be added to the SSMI to allow the DCC to upload a Comms Hub Returns file (the processing sequence will be similar to that for the CH Stock Transfer file introduced under SECMP0140, CR4176). Processing of this file upload will set the CHF and its associated GPF to “decommissioned”, which will enable a subsequent CH unlock request to be processed. Note that there will be limitations of the number of files, and the number of CHF in each file such that extra infrastructure or processing capacity does not need to be added to the DSP.

This solution option will introduce new steps in the submission process:

- initial validation and response – to check the submission details of the devices against the SMI state, the size limitations, and that the request is correctly formatted. The DSP will provide a response to the submitting Party, listing the valid identifiers, and will also identify cases where there are active meters linked to the Comms Hubs.

- once the submitting Party is happy with that listing, they may re-submit the listing, or send an updated listing indicating their willingness to proceed.
- processing – the DSP to update the CHF (and its GPF) to “decommissioned” and for the DSP to delete any schedules or DSP Future Dated requests for those devices.

Upon acknowledgement of successful processing from the DSP, Parties can return their Comms Hubs following existing processes.

4.2.2 Other Service Providers (B)

No changes to the processes or functionality of any other Service Providers are required for this solution option.

4.2.3 Process Impacts (B)

Service Users who wish to return Comms Hubs using the alternative method will compile a list of Comms Hubs for return and will specify at least the:

- Global Unique Identification (GUID)
- make and model of any such Comms Hubs
- region of the Comms Hubs

These parameters will be reviewed and verified as part of the Full Impact Assessment.

DCC Logistics, as prompted by the DCC Service Desk, will have to check and load the list of Comms Hubs through the SSML.

The new process and associated legal text will be reviewed as part of the FIA.

4.3 Other System Impacts

Whichever Solution Option is implemented, there will be changes and impacts outside the system-based functional changes required.

In all cases, more detailed assessments will be carried out as part of the FIA.

4.3.1 (Data Science and Analytics) Reporting

Improved reporting will allow SEC Parties to see where their returned Comms Hubs are in the process. The reporting will only include two stages; one upon receipt by the CSP of each Comms Hub and another once triage is completed. This is a “Should” requirement, as the DCC has noted there is potential to increase a current Comms Hubs returns report in frequency which should suffice, and that change has been included in the Costs section on section 6.

4.3.2 Security Impact

There will be no significant change to the security design as a result of this change. The solutions use existing design patterns, and there are no interface or major changes to functionality meaning there is no requirement for a penetration test or any changes to the existing protective monitoring approach.

4.3.3 DSP Service Impact

Solution Option	Transition to Operations	Enhanced (post Go Live) Support
Option A, CSP Upload	Will be minimal following the test phases; however, the DSP Application Management Services (AMS) team will ensure all applications continue to function correctly during and post cutover. A small effort will be included to cover knowledge transfer and to allow the team to review the implementation.	Enhanced monitoring and checking of system health aims to immediately investigate and address any anomalous behaviour caused by updates to the system. It is not thought that the Modification will have a material ongoing service impact, therefore no change to the fixed Operational Charge will be included.
For Option B: DCC Upload:	Knowledge transfer activities and monitoring	There will be service impact from the new file upload interface added to the SSMI; interfaces and processing will be impacted, potentially requiring investigation and resolution of issues relating to the uploading or processing of the transfer file. An estimate of up to two low complexity calls per month.

4.3.4 Infrastructure Impact

There will be no change to the infrastructure design as a result of this Modification. Additional processing and storage will be required. However, they are not sufficiently large to warrant the procurement of additional compute power or storage.

5 Implementation Timescales and Approach

This Modification is expected to be implemented in a future SEC Release. Design, Build, and Pre-Integration Testing (PIT) is expected to take eight (8) months for Solution Option A, and approximately four (4) months to complete Solution Option B, after the CAN is signed. Post-PIT activities would be likely to take up to three (3) months. The Modification would be added to a suitable SEC release after the FIA is completed.

5.1 Pre-Integration Testing

The nature of the PIT, and all integration testing, is quite different based on the chosen solution option:

- For Option A: CSP Upload, the DSP PIT team test the updated N4 API to ensure the CHF and GPF are only decommissioned when the received CH logistics are set to “RETURNED” and once the returned CH passes validation i.e. there are no active meters associated with it. Significant CSP functional testing will be required.
- For Option B: DCC Upload, the DSP PIT Test team will simulate a new CH Returns File Upload and test that only authorised users are allowed to upload and approve the file for SSMI. Additionally, the file upload will be tested to ensure that the CHF and GPF are fully decommissioned.

5.2 System Integration Testing

The proposed SIT functional test execution scope for this Modification is:

- For Option A, CSP Upload:
 - for each CSP, submit an N4 API request with a CH status of “RETURNED”;
 - for each CSP, submit an N4 API request that fails validation for a CH having an active device, which requires a basic Install & Commission (I&C) to be executed.
 - This solution option will have a significant level of CSP SIT and regression testing associated with it.
- For Option B, DCC Upload :
 - upload a validated file via SSMI to update the status of a single and multiple CHs to “Decommissioned”;
 - upload a file via SSMI that fails validation.
 - This solution option will have no CSP SIT functional testing and minimal regression testing associated with it, as there is no change to existing functionality or components outside of the DSP.

The Modification requires two new SIT test scenarios and scripts to be written regarding of the solution option selected. The SIT preparation activities will produce the necessary SIT artefacts, i.e. Heatmap, test scenario, test script, for DCC review and approval.

5.3 User Integration Testing

User Integration Testing (UIT) activities are excluded as there is minimal User involvement for this Change, although there would be process testing for the new process developed with DCC Logistics.

DCC believes that the validation and reporting associated with Solution Option B would require UIT, and will challenge this as part of the FIA.

6 Costs and Charges

The scope of supply under this PIA includes design, development (build), system testing, and performance testing within the PIT environments.

The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as shown in section 3.4. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a Full Impact Assessment and as such there may be elements missing from the solution or the solution may be subject to a material change. As a result, the final offer price may result in a variation.

6.1 Design, Build and Pre-Integration Testing Cost Impact

The table below shows the ROM cost of delivering the changes required to implement this Modification. For a PIA, only the Design, Build, and PIT indicative costs are supplied.

£ ROM	Design, Build and PIT	Cost of FIA
Solution Option A	£860,000 to 1,000,000	£104,000
Solution Option B	£200,000 to 300,000	£17,636

As described above in sections 5.2 and 5.3, Solution Option A would incur significant integration functional and regression testing costs, while Option B would have far less impact. For both Options, if the targeted SEC Release date includes another Modification or Change Request with regression testing, that cost will be shared equally between the two (or more) changes, and the cost of Integration Testing will come down.

Based on the existing requirements, the Full Impact Assessment would be expected to be completed in 40 working days.

6.2 Contract and Schedule Impacts

No changes to Schedule 2.2 (Performance Measures and Reporting) are expected as a result of this Change.

Updates to the DSP Design Baseline (Schedule 4.1) and Payment milestones (Schedules 6.1 and 7.1) are anticipated.

Appendix A: Glossary

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

Acronym	Definition
AMS	Application Management Support
API	Automated Programming Interface
ASN	Advanced Shipping Notification
CAN	Contract Amendment Note
CHF	Comms Hub Function
CH, Comms Hub	Communications Hub
CoS	Change of Supplier
CR	DCC Change Request
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DS&A	Data Science and Analytics
ESME	Electricity Smart Metering Equipment
FIA	Full Impact Assessment
GBCS	Great Britain Companion Specification
GPF	Gas Proxy Function
GSME	Gas Smart Metering Equipment
GUID	Global Unique Identification (Identifier)
I&C	Install & Commission
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
RAID	Risks, Issues, Assumptions, and Dependencies
ROM	Rough Order of Magnitude (cost)
RSA	Registered Supplier Agents
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
SMI	Smart Metering Inventory
SR	Service Request
SRV	Service Reference Variant
SSC	Security Sub-Committee
SSMI	Self Service Management Interface
TTO	Transition to Operations
UIT	User Integration Testing

Appendix B: RAID

No Risks, Issues, or Dependencies have been identified for Solution Option B at this time.

Assumptions

Ref	Description	Status/Mitigation
MP252-A1	For Solution B, DCC Upload: a. files will be small (under 1000 CHF's); b. run frequency will be low (up to 100 files per day, each file consisting of up to 1000 CHF's); c. the processing sequence will be similar to that for the CH Stock Transfer file introduced under CR4176, e.g., the file will be processed sequentially, one CHF at a time.	DCC will be responsible for the loading of the files into the system.
MP252-A2	Performance testing will not be required as the volumes stated in A1 will not be exceeded.	Accepted

Appendix C: Draft Process for Alternative Returns of Communications Hubs



MP252 CH
returns.pdf