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MP207 ‘Allowing Registered Supplier Agents to Maintain Meter Firmware’ Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

SECAS received 10 responses to the Modification Report Consultation. Eight respondents believed that the modification should be rejected, considering that the modification did not better facilitate SEC Objective (a)¹. Two respondents believed it should be approved with one considering the modification better facilitated SEC Objectives (a), (c)² and (e)³.

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

² facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.

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Modification Report Consultation responses

Summary of responses

Does not address the issue or problem statement

Two respondents (Network Party and Large Supplier) noted the solution provided does not address the issue, nor sufficiently addresses the problem statement.

Two respondents (Large Suppliers) noted that with the removal of SR11.3 from scope (due to valid security concerns), MP207 no longer met the requirements of “maintaining meter firmware”. They added that the MP207 sets out to keep firmware up to date, but the solution of this modification would not resolve the problem statement, therefore they do not believe it is appropriate to approve.

One respondent (Large Supplier) noted that that this modification strongly benefits SEC Objectives (a) and (c) as the efficient and timely updating of firmware on metering devices is critical to ensuring the continued operation of these devices and the Smart Metering network as a whole. They added that this would help ensure that meters continue to receive critical security and feature updates, benefitting General SEC Objective (e) as well.

Fragment the firmware update process

One respondent (Large Supplier) noted that having a third party send the SR11.1 would add an unnecessary step. One respondent (Other SEC Party) noted that MP207 would only be introducing an additional party to the firmware update process, given Suppliers would still need to activate the firmware. They added that MP207 would introduce unnecessary complexity and increase the likelihood of errors.

One respondent (Other SEC Party) noted the Proposed Solution would still require the Supplier to sign the firmware images, as the signature in the image can only be verified by the Device using the Supplier Trust Anchor Cell. They added that this would require additional Supplier business processes and operational procedures plus impacts on Adapter providers and additional cost. They concluded that MP207 will effectively fragment the firmware process where two parties are involved in an already complicated journey.

Two respondents (Large Suppliers) noted that the Proposed Solution is reliant on the relevant Supplier to maintain the Firmware by sending the SR11.3 which reduces the efficiency of the Firmware maintenance process.

Three respondents (Large Suppliers) noted that MP207 does not better facilitate SEC Objective (a) as it is not likely to lead to efficiency in the operation of Smart Metering Systems. They also noted MP207 does not but believe this modification meets any of the SEC objectives.

No support from Suppliers

Six respondents (Network Party, Large Suppliers and Other SEC Parties) commented that there appeared to be no support from any of the Industry forums or groups, including Small Suppliers who are assumed to benefit most.

Cost benefit

One respondent (Other SEC Party) noted the implementation costs of MP207 are significant and would ultimately be passed on to consumers. They added that given the lack of clear benefits and the potential for increased expenses without substantial improvements to the Smart Metering Implementation Programme, this modification is unjustifiable. One respondent (Other SEC Party) added that MP207 does not provide any cost benefit.

One respondent (Large Supplier) noted the solution will only enable partial steps in the firmware process which significantly limits the benefit of making this change. They added that the modification has an unsupported business case, with the partial solution proposed and unfavourable costs/benefits to the Industry, they cannot support the approval of MP207.