

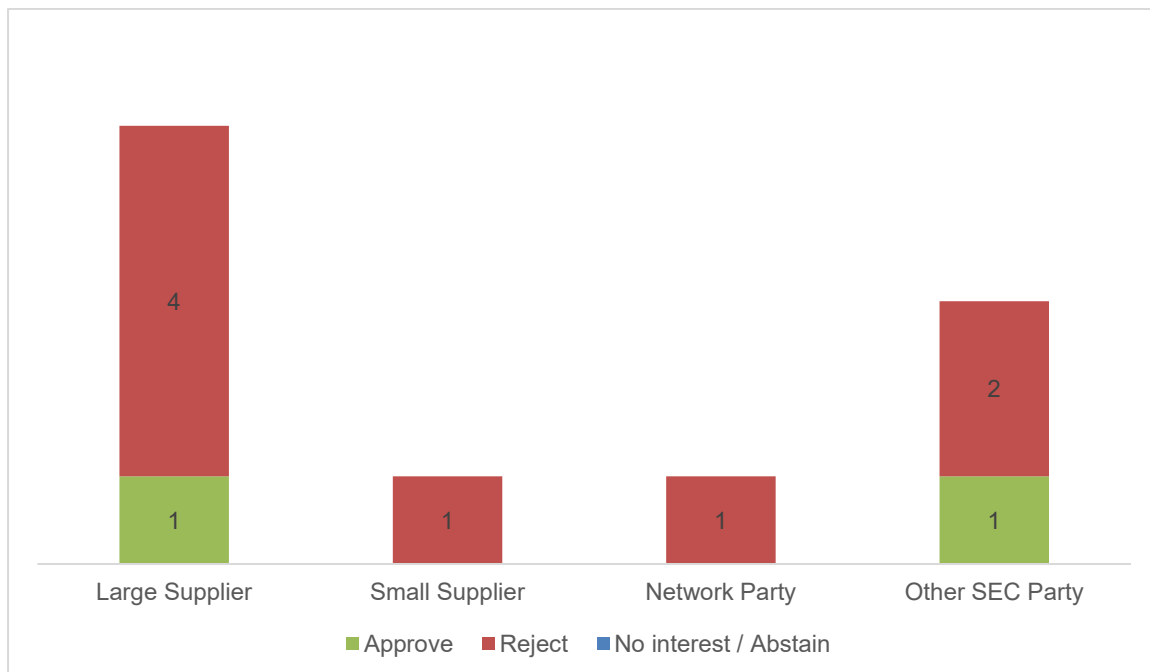
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MP207 ‘Allowing Registered Supplier Agents to Maintain Meter Firmware’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP207 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP207 should be approved or rejected?

Question 1			
Respondent	Category	Response	Rationale
National Grid Electricity Distribution	Network Party	Reject	The solution provided does not address the issue. There is an assumption that Small Suppliers need this, but there is no support from Small Suppliers.
British Gas	Large Supplier	Reject	I just can't see how this would be any benefit. It certainly does not have any rationale that would link to the General SEC Objectives. It only allows the RSA to deliver the Firmware updated, not Activate. And no Supplier has yet stepped forward to agree they will use it.
Utility Warehouse	Large Supplier	Reject	Utility Warehouse manages the Firmware upgrades to devices very successfully. Having a third party send the SR11.1 would add an unnecessary step.
ENGIE Power Limited	Small Supplier	Reject	We believe that MP207 would not better facilitate Objective (a) as it is not likely to lead to efficiency in the operation of smart metering systems.
Vantage Meters Investments Limited	Other SEC Party	Reject	MP207 would only be introducing an additional party to the firmware update process, given Suppliers would still need to activate the firmware. This modification would introduce unnecessary complexity and increase the likelihood of errors. We have not seen any evidence of demand for this service from suppliers, nor does it address any critical issues. Additionally, the implementation costs of MP207 are significant and would ultimately be passed on to consumers. Given the lack of clear benefits and the potential for increased expenses without substantial improvements to the smart metering programme, this modification is unjustifiable.
ESG Global Ltd	Other SEC Party	Reject	The Supplier would still be required to sign the firmware images (as GBCS changes are out of scope), as the signature in the image can only be verified by the device using the Supplier Trust Anchor Cell.

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			This would therefore require Suppliers, via their adapter providers, to process the firmware images anyway and then forward to the RSA Party – requiring additional Supplier business processes and operational procedures plus impacts on Adapter providers and additional cost. Additionally, the Supplier is still required to activate the firmware via the sending of SRV11.3 as this has been removed from the scope of this Modification. This Modification will effectively fragment the firmware process where two parties are involved in an already complicated journey. According to the Mod report it does not have any support from SEC Parties or Sub-Committees and does not provide any cost benefit.
Octopus Energy Ltd	Large Supplier	Reject	We do not believe this modification meets any of the SEC objectives, nor sufficiently addresses the problem statement. The modification report details well that there has been no evidence of support from any of the Industry forums or groups, including Small Suppliers who are assumed to benefit most. The solution will only enable partial steps in the firmware process which significantly limits the benefit of making this change. We do not support the approval of this modification due to the unsupported business case, the partial solution proposed and unfavourable costs/benefits to the Industry.
Stark Connect	Other SEC Party	Approve	-
EDF Energy	Large Supplier	Reject	This is an expensive change that provides no direct benefit to EDF. Additionally, we don't believe it would even benefit smaller suppliers who might want a third party to manage the FW on their meters because the solution is incomplete without sending both the 11.1 and the 11.3.
Utilita Energy Ltd	Large Supplier	Approve	We believe that this modification strongly benefits General SEC Objective (a) and (c) as the efficient and timely updating of firmware on metering devices is critical to ensuring the continued operation of

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Question 1			
Respondent	Category	Response	Rationale
			these devices and the Smart Metering network as a whole. Additionally, this would help ensure that meters continue to receive critical security and feature updates, benefitting General SEC Objective (e) as well.

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
National Grid Electricity Distribution	Network Party	-
British Gas	Large Supplier	-
Utility Warehouse	Large Supplier	-
ENGIE Power Limited	Small Supplier	Please refer to our MP207 Refinement Consultation Response as replicated in Annex D to the Modification Report.
Vantage Meters Investments Limited	Other SEC Party	N/A
ESG Global Ltd	Other SEC Party	-
Octopus Energy Ltd	Large Supplier	As the scope of this modification has been reduced to remove SR11.3 due to valid security concerns, it no longer meets the requirements of “maintaining meter FW”. There will still be a reliance on the relevant supplier to maintain the Firmware by sending the 11.3 which reduces the efficiency of the Firmware maintenance process. The modification sets out to keep firmware up to date but the solution of this modification would not resolve the problem statement, therefore we do not believe it is appropriate to approve.
Stark Connect	Other SEC Party	-

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Question 2		
Respondent	Category	Comments
EDF Energy	Large Supplier	None
Utilita Energy Ltd	Large Supplier	No further comments.