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MP262 ‘Extending the Installation End Date for CHTS v1.0 and GBCS v1.1’ Conclusions Report – version 0.2

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

Smart Energy Code Administrator and Secretariat (SECAS) received five responses to the Modification Report Consultation. Three respondents believed that the modification should be approved. They considered the modification better facilitated SEC Objective (a)¹. One respondent abstained and another believes this modification should be rejected.

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

Modification Report Consultation responses

Summary of responses

Two respondents (Small Suppliers) believe that approving the modification would permit large numbers of Communication Hubs to be installed, preventing them from being scrapped which will impact the environment and cause financial costs.

Another respondent (Large Supplier) considered that the argument was negated due to the age of the Devices and the potential for a second site visit to be conducted to remediate any issues caused by upgrade failures. They also stated that the financial cost of a second visit may be carried over by a churn Supplier.

One respondent (Large Supplier) believed that this modification should be rejected. They noted the Technical Architecture and Business Architecture Sub-Committee (TABASC) did not recommend extension of the dates. The respondent commented that there should not be official support for Communications Hubs that have known defects, and which do not support a prepayment customer.

One respondent (Small Supplier) also highlighted that the DCC has been unable to facilitate large amounts of returns simultaneously therefore returns have not been an option.

Another respondent (Large Supplier) noted that the previous end dates expired 14 months ago and queried what has been happening with these Devices since then.

One respondent (Large Supplier) abstained noting that there is no direct benefit to their organisation from this modification being implemented. They support the views from TABASC that the Communication Hubs can still be installed and therefore the main impact this modification is attempting to address is whether the installs would be considered in Suppliers' roll out targets.

Change Board discussions (June 2024)

A Change Board member (Large Supplier) advised that they had responded to the Modification Report Consultation in support of this modification being implemented, however stated they have concerns about non communicating Devices. They suggested that non-communicating Devices are a bigger risk than stranded stock. They noted that extending the TSAT could introduce a risk that older Devices may be redistributed which could have negative impacts across the industry.

The TABASC Chair was present during the meeting and stated there was no technical blocker to preventing a Communications Hub on CHTS v1.0 and GBCS v1.1 from being installed other than not counting towards Suppliers roll out targets. They highlighted the importance of Devices to be upgraded in the shortest time possible to ensure the Devices are operating as intended. They questioned whether installs would count towards roll out targets if the Devices are upgraded. The TABASC Chair advised if MP262 is approved, the TSAT becomes insignificant as it will continue to be extended and not drive the intended behaviour.

A Change Board member (Large Supplier) noted that the DCC is responsible for upgrading the Communications Hubs and noted this would still leave the Supplier at risk.

The Proposer also queried whether, if approved, installs would be able to count retrospectively.

SECAS and Ofgem were not able to answer these two questions during the meeting and Change Board decided the modification was not able to be voted upon until this information was provided.

SECAS has since investigated this with Ofgem and notes the requirement is detailed within the Electricity Supply Licence Condition 39. This details that for an installation to count towards targets, the Communications Hub must comply with a version of the CHTS which is within its Installation Validity Period on the day it is installed. Therefore, if upgraded to a compliant version on the same day as installation it can count towards targets. However, a Communications Hub that was installed whilst the valid TSAT date was expired would not count towards roll out targets.