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MP252

‘Amending the process for Communications Hub returns’

Modification Report

Version 1.0

29 January 2025



About this document

This document is a Modification Report. It sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has six annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex C** contains the draft DCC Alternative Returns for Communications Hubs Guidance document.
- **Annex D** contains the full responses received to the Refinement Consultation.
- **Annex E** contains the MP252 DCC Full End to End costs (including SEC Release regression testing).
- **Annex F** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by David Lane from Smart Metering Systems (SMS) PLC.

Smart Energy Code (SEC) Section F 'Smart Metering System Requirements' and Appendix I 'CH Installation and Maintenance Support Materials' details the requirements enabling Parties to return Communications Hubs. This can either occur where a problem is identified prior to its installation or after installation and subsequent removal. To return a Communications Hub, the Party must send a Service Reference Variant (SRV) for each Communications Hub they want to return to the DCC.

The DCC has identified over 65,000 Communications Hubs which are 'not on the wall' and are in the possession of non-Responsible Parties. Where the Party in possession is not the Responsible Supplier, the Party are unable to decommission the Communications Hub or identify the Responsible Supplier.

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 within 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 these issues both now and for future volumes of Communications Hub returns.

The Communications Hubs in the Proposers (and other non-responsible Parties) possession are taking up space in their warehouses and incurring ever increasing storage costs. The Proposer also noted that where they are unable to meet the 90-day Service Level Agreement (SLA) to return the Communications Hub following decommission, there is a financial impact for the Party in possession of the Communications Hub, the Responsible Supplier and indirectly, consumers.

The Proposer also highlighted that the volume of Communications Hubs will continue to increase and likely at an accelerated rate once 4G Communications Hubs are rolled out (currently expected to commence in July 2025).

The Proposed Solution will allow any SEC Party to return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) with additional validation. This will provide three possible routes for the Communications Hub return records to be created in DSMS. There will be a new DUIS error code associated with SRVs 8.14.3 and 8.14.4, which will require DCC Users to move to the new version of DUIS. DCC Users not on this new version of DUIS will get an overloaded or existing error.

This modification will impact all SEC Parties and the DCC. The cost of implementation for the Proposed Solution is £329,626 with a first year operating charge of £24,563. If approved, this modification is targeted for the November 2025 SEC Release and will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

A Communications Hub is a physical Device that includes a Communications Hub Function (CHF) together with a Gas Proxy Function (GPF) that is used to connect a Smart Meter with the DCC System. 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; being held in storage prior to installation; or after removal but before returned to the DCC. Upon return of each Communications Hub to the DCC, there is a one-time charge levied on the Responsible Supplier, dependant on if the Communications Hub returned can be redeployed or not.

The DCC provides a returns process for Communications Hubs. The aim being that these can be triaged, refurbished and reissued. The Communications Hub can either be returned without ever being installed at a property or following a removal. To return a Communications Hub, the Party must send an individual SRV for each Communications Hub they want to return to the DCC¹. Clauses 9 and 10 of SEC Appendix I outline how a Communications Hub should be removed, how to notify the DCC of its impending return and how to return the Communications Hub. Currently two key conditions must be met:

1. The SRV requesting return must originate from the Supplier who is responsible for the Communications Hub; and
2. The Communications Hub status must be either 'Decommissioned' if it has been installed previously or returned prior to installation.

Alternatively, if a Party is not able to submit an SRV in accordance with SEC Appendix I clauses 9.4, 9.5, 9.6, 9.7 or 9.8, that Party shall contact the DCC Service Desk.

The SRVs associated with Communications Hub returns are outlined in SEC Appendix AD 'DCC User Interface Schedule' (DUIS). They are SRV 8.14.3 (CommsHubStatusUpdate-FaultReturn) and SRV 8.14.4 (CommsHubStatusUpdate-NoFaultReturn). The criteria state that the only Eligible Users are Import Suppliers, Gas Suppliers and Registered Supplier Agents (RSA).

What is the issue?

The Proposer, who is a Meter Operator (MOP), has accumulated over 20,000 Communications Hubs over time, which have ended up in their possession through incorrect removal procedures and not in the status of decommissioned on the Smart Metering Inventory (SMI). As the Proposer is not the Responsible Supplier, they are unable to decommission the Communications Hub nor identify the Responsible Supplier due to the confidentiality clauses in SEC Section M 'General' as follows:

M4. CONFIDENTIALITY

Prohibition on disclosure and use by DCC

- M4.1** *Subject to Sections M4.3 and M4.4, the DCC shall not disclose another Party's Confidential Information to, or authorise access to another Party's Confidential Information by, any person.*

¹ Some organisations have an internal method of sending bulk return requested to the DCC.

M4.2 Subject to Section M4.3, the DCC shall not use a Party's Confidential Information for any purpose other than the purpose for which it was provided (or otherwise made available) to the DCC, and in any event for any purpose other than the purposes of this Code

The ownership of a Communications Hub would fall into that definition of Confidential Information, which the DCC is therefore precluded from disclosing. The SEC would need to be amended to provide the DCC with the authority to provide this information to other parties.

Due to the Party in possession of the Communications Hubs being unable to update the details to the DCC, these Communications Hubs are unable to undergo triage, refurbishment, redeployment, or secure disposal. This also has resulted in incorrect charges being placed on Suppliers for Communications Hubs which are no longer at a consumer's premises, nor in the Supplier's possession. Communications Hub rental charges are ongoing until a Communications Hub is returned to the DCC. When a Communications Hub is returned to the DCC, there is a one-time charge for any Communications Hub returned and redeployed or returned and not redeployed. A number of these Communications Hubs have been subject to rental charges for a long period of time, whereby if they were returned at the point of removal, the Responsible Supplier may have made some savings compared to the ongoing rental charges. A further complication is that due to the age of some of these stranded Communications 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.

The Proposer has found the Communications Hub removal and returns process overly complicated and resource heavy. This holds challenges for Parties to follow efficiently and allow for Devices to be returned within the timeline stated in the SEC Appendix I 'CH Installation and Maintenance Support Materials' as follows:

10. COMMUNICATIONS HUB RETURNS

10.1 Where a Supplier Party has handed back a Special Installation Mesh Communications Hub to the DCC whilst in attendance at the relevant premises and where the Special Installation Mesh Communications Hub had been installed at a previous installation visit, the Party shall submit Service Request 8.14.3 (Communications Hub Status Update – Fault Return) or Service Request 8.14.4 (Communications Hub Status Update – No Fault Return) in respect of the Communications Hub returned in accordance with DUIS within three (3) Working Days.

Delivery of Returns

10. 11 Where the Party does not return a Communications Hub within 90 days pursuant to Section F8.6 of the Code, the Communications Hub shall be deemed to be lost or stolen and the DCC shall prevent that Communications Hub from connecting to the Smart Metering Wide Area Network (SM WAN).

As referenced in SEC Section F 'Smart Metering System Requirements' as follows:

F8. REMOVAL AND RETURN OF SMETS2+ COMMUNICATIONS HUBS

Return of Communications Hubs

F8.6 Where a Communications Hub is removed by a Supplier Party from a premises at which it was previously installed, the Supplier Party shall return the Communications Hub to the DCC within 90 days after the date of its removal. This obligation to return a Communications Hub only applies where the Communications Hub Function which forms part of that Communications Hub has at any time had an SMI Status of 'installed not commissioned' or 'commissioned'.

These sections and clauses constitute a 90-day SLA to return the Communications Hub following decommission, and a three-day SLA between decommission and return request SRV sent.

Based on the above, the main issues the Proposer would like to explore further as part of this modification are as follows:

- Inability to Identify current Communications Hub's Responsible Party and no current process for Non-Responsible Party to return Communications Hub to CSP. Non-Responsible Parties unable to send secure SRV 8.3 'DecommissionDevice' before sending SR8.14.3 'CommsHubStatusUpdate-FaultReturn' and SR 8.14.4 'CommsHubStatusUpdate-NoFaultReturn' for Communications Hubs to be returned.
- No process to return Communications Hubs where a Change of Supplier process has failed to change the Responsible Party or a current Supplier fails to 'Decommissioned' at point of Communications Hubs removal and subsequently, the Consumer proceeds with a Change of Supplier.
- SEC Parties unable to meet the 90 Day SLA from when SRV 8.3 'DecommissionDevice' and SR8.14.3 'CommsHubStatusUpdate-FaultReturn' or SR 8.14.4 'CommsHubStatusUpdate-NoFaultReturn' is sent until the Communications Hub is returned to CSP.
- The current manual process for the DCC and SEC Parties to validate each Communications Hub return request, adding time delays to the process which prevents unsolicited Communications Hub returns being sent to the CSP.
- With current Communications Hub returns process being laborious, this has limited the volume of Communications Hub returns which can be processed by the CSP.
- Lack of near real time reporting mechanism to monitor Communications Hubs returns data.

What is the impact this is having?

The Proposer has over 20,000 Communications Hubs in their possession, taking up space in their warehouses and incurring ever increasing storage costs. The DCC has noted they are aware of over 65,000 Communications Hubs which are not 'on the wall' and are with non-Responsible Parties. These Communications Hubs will also be the cause of ongoing rental charges to the Responsible Supplier until they're returned. The Proposer also noted that where they are unable to meet SLA, there is a financial impact for the Party in possession of the Communications Hub, the Responsible Supplier and indirectly, consumers. The Proposer believes that if the rules are relaxed or an alternative returns route can be found, the Communications Hubs could undergo triage, redeployment, refurbishment or secure disposal.

The Proposer also noted that the volume of Communications Hubs will continue to increase and at an accelerated rate once installation of 4G Communications Hubs begins.

Impact on consumers

There is an indirect impact on all consumers, as this would mean costs associated with Communications Hubs are allocated correctly to SEC Parties. It would also ensure uninstalled or removed Communications Hubs are able to undergo triage, redeployment, refurbishment or secure disposal. This would reduce the number of new Communications Hubs that need to be manufactured which should result in cost saving for industry, which is passed onto consumers.

3. Solution

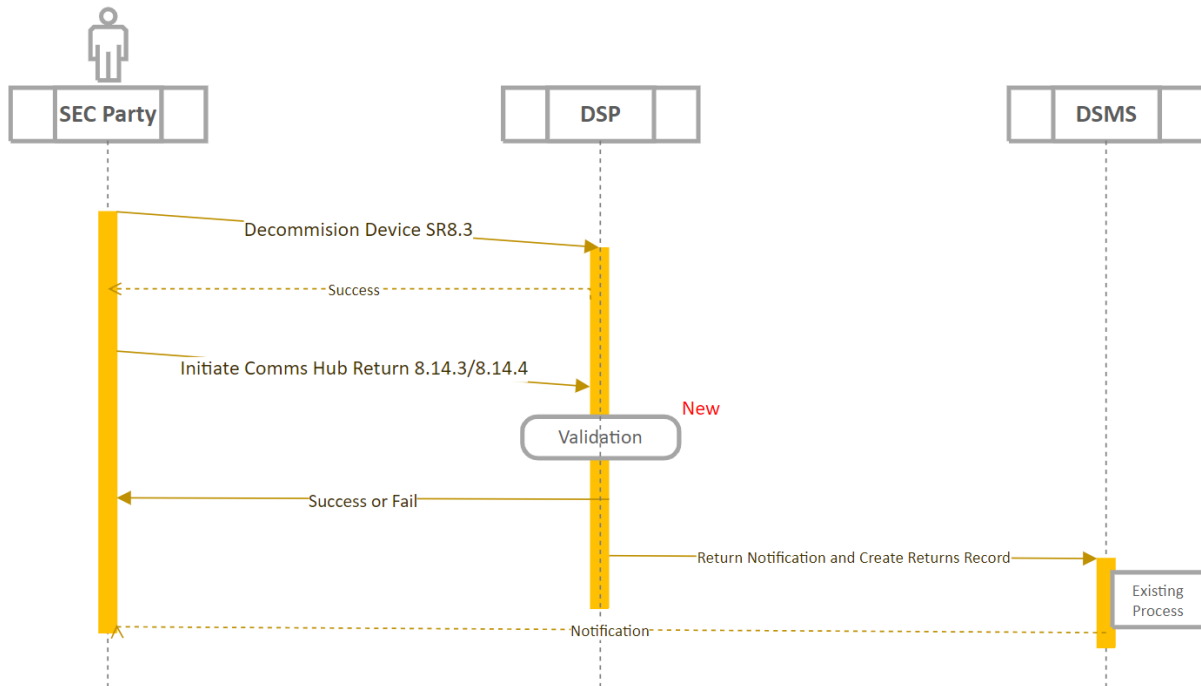
Proposed Solution

The Proposed Solutions will allow any SEC Party to return Communications Hubs to the DCC.

SEC Parties should return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) with additional validation. This will provide three possible routes for the Communications Hub return record to be created in DSMS. There will be a new DUIS error code associated with SRVs 8.14.3 and 8.14.4, which will require DCC Users to move to the new version of DUIS. DCC Users not on new version of DUIS will get an overloaded or existing error.

The three possible routes are detailed in the below Use Cases:

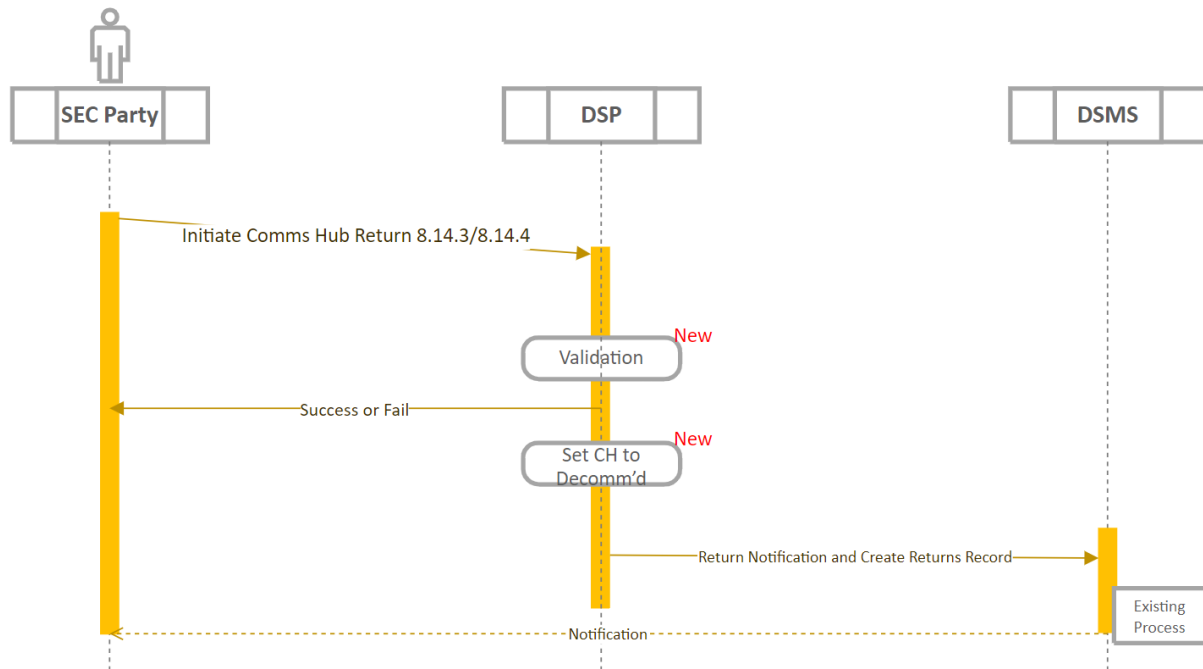
Full Process, Create Return Record



Use Case 1

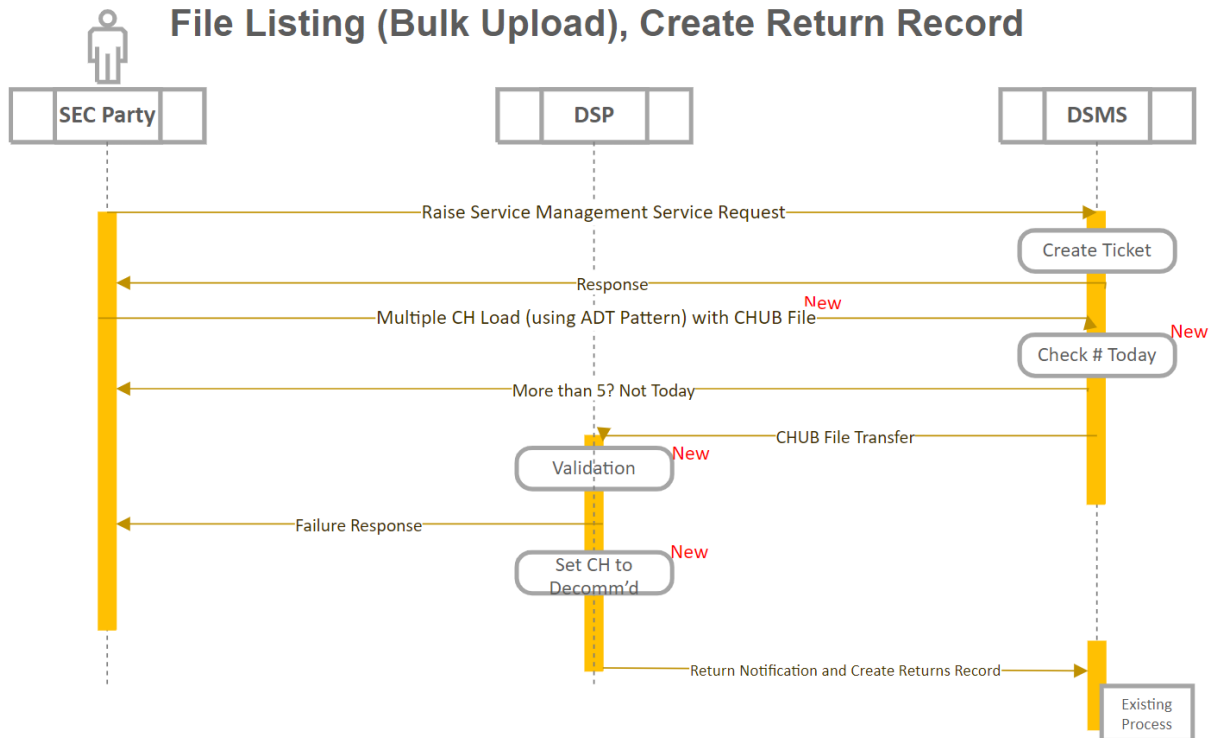
This sequence diagram describes the DCC preferred process and is sometimes referred to as the current “happy path”. In this Use Case, SEC Parties are able to send a SR8.3 ‘Decommission Device’, and when successful, the Communications Hub status in the SMI is updated to ‘Decommissioned’. The SEC Party will then send the SRV 8.14.3 or 8.14.4, which has a new DSP validation to check the SMI is set to ‘Decommissioned’ before continuing to create a Return Record in the DSMS.

Comms Hub Not Decommissioned, Create Return Record



Use Case 2

In this Use Case, the Party holding the Communications Hub prior to return has either, not submitted a SR8.3 for that Device, or is unable to submit a successful SR8.3 as they are not the Responsible Party. Once a Party submits a SRV8.14.3 or 8.14.4, and the Communications Hub Global Unique Identification (GUID) passes DSP Validation, it is set to 'Decommissioned' in the SMI. Without this change, the SMI status cannot be set to 'Decommissioned' by the DSP.



Use Case 3

This Use Case requires the User submitting a list of GUIDs for processing to create a Service Management Service Request (SMSR), and then to submit a Communications Hub Update Bulk (CHUB) file containing a list of up to 1,000 GUIDs.

Prior to submission of the CHUB file, the DCC User should raise a SMSR via the Self-Service Interface (SSI) to obtain a reference number for use in its submission to DCC, where the reference number is generated by the SSI automatically. The User should obtain submission approval from their own Second Line support and then send a CHUB File to the DCC via the DCC's secure delivery method of choice. The User submission must include: (a) the SMSR reference number in the subject line of the submission, and (b) the CHUB file in the required format, digitally signed by a Private Key associated with a File Signing Certificate and provided to an Authorised Responsible Officer (ARO) in accordance with the Smart Metering Key Infrastructure (SMKI) Registration Authority Policies and Procedures (RAPP).

The User should then update the SMSR from the submission. Validation and setting the Communications Hub status to 'Decommissioned' in the SMI follows the same pattern as the previous two Use Cases.

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
✓	DCC Other Users	✓	MAPs/ MAMs

This would impact the DCC and all SEC Parties, as it is an alternative route for any SEC Party to return a Communications Hub to the DCC.

The Proposed Solution is not expected to have any negative impact on SEC Parties, as it is intended that they will use the current Communications Hub process. There is likely to be a positive impact on SEC Parties due to non-Responsible Party being able to return a Communications Hubs to the DCC.

The Proposed Solution will have impact on SEC Parties who are in possession of a Communications Hub and not the current Responsible Supplier wishing to return a Communications Hub to the DCC. They will need to submit a CHUB file with a list of Communications Hub GUIDs to return via the SMSR.

DCC Systems

DCC System changes

This Proposed Solution will have impacts on the DSP, CSPs and DSMS. This will require additional validation by the DSP of the CHUB file contents and also number of files submitted per day. There will also be additional validation by the DSP to a check that the Communications Hub is not still communicating. If the Communications Hub is not communicating, the DSP processing will be amended to set the Communications Hub SMI status to 'Decommissioned'.

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

DCC System traffic

This modification will have no impact on DCC System traffic.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- SEC Section A 'Definitions and Interpretations'
- SEC Section F 'Smart Metering System Requirements'
- SEC Appendix I 'CH Installation and Maintenance Support'
- SEC Appendix Q 'IKI Certificate Policy'
- SEC Appendix AD 'DCC User Interface Specification'
- New Code Required Document - Alternative Returns for Communications Hubs

Technical specification versions

This modification will impact Appendix AD 'DCC User Interface Specification' (DUIS).

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 will affect all Communications Hubs.

Consumers

This modification will not impact Consumers.

Other industry Codes

This modification will not impact any other industry Codes.

Greenhouse gas emissions

This modification will not impact greenhouse gas emissions.

5. Costs

DCC costs

The DCC implementation costs to implement this modification is £329,626 and an additional £24,563 for first year.

The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£232,006
integration Testing, Systems Integration Testing (SIT) & User Integration Testing (UIT)	£86,300
Implement to Live	£11,320
Application Support	£24,563 for first year ²

The DCC has indicated that the Proposed Solution will incur regression testing costs which is detailed in Annex E, these costs are an initial estimate and the DCC are working to reduce them as much as possible.

More information can be found in the DCC Impact Assessment response in Annex B.

SECAS costs

The estimated Smart Energy Code Administrator & Secretariat (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

One Refinement Consultation respondent (Large Supplier) highlighted that it anticipates an estimated amount of under £100,000 of costs incurred by the implementation of this modification. This is due to the Large Supplier needing a Full-Time Equivalent (FTE) to handle the extra activity, noting Solution Option B would have greater on-going costs than Solution Option A. They additionally noted costs may increase in the future due to expected increase of returns with 2/3G sunsetting and 4G Communications Hubs installations. Another Refinement Consultation respondent (Large Supplier) noted Solution Option A would have minimal costs incurred.

² The Application Support will cover support in the first year, if there are no support calls, there won't be a charge. There are no expected charges after the first year.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received on or before 26 February 2025; or
- **25 June 2026** (June 2026 SEC Release) if a decision to approve is received after 6 February 2025 but on or before 25 September 2025.

The earliest possible SEC Release that can be targeted is the November 2025 SEC Release, this is based on the nine months' timescale required for implementation stated in the DCC Impact Assessment.

DUIS Schema

The DUIS Schema will require an uplift to implement the new DUIS error codes and confirmations message relating specifically to Communications Hubs returns. SECAS is aware that there are other larger industry wide projects in progress that will likely require a DUIS Schema uplift.

November DUIS uplift

If this modification is approved in time for a November 2025 Release and the DUIS Schema uplift takes place in November 2025, only DCC Users who move onto the new DUIS Schema would receive the new DUIS error codes and confirmation message. These error codes and confirmation message applies to SRVs 8.14.3, 8.14.4 and Communications Hub IDs submitted as part of a CHUB file to facilitate identification of the source of a validation failure. DCC Users who remain on an older version of the DUIS Schema will receive a generic error code from the DCC when using the new functionality. Parties will still be able to use the functionality within this modification to return Communications Hubs irrespective of the DUIS version they are using.

SECAS understands that the DUIS Schema uplift will require regression testing of SEC Party systems. As this is currently the only DUIS Schema change within the November 2025 SEC Release Parties should consider if they would prefer the DUIS Schema uplift to introduce the new error codes and confirmation message to be undertaken alongside a more significant DUIS Schema change at a later date.

7. Assessment of the proposal

Areas for assessment

Number of Communication Hubs with non-Responsible Parties

The Proposer has noted they have 20,000 Communications Hubs in their warehouses and this number is growing daily. The DCC has identified over 65,000 Communications Hubs which are not at consumer premises and instead are with non-Responsible Parties.

The Proposer agrees the confidentiality clause applies, however wanted to explore the possibility of having an opt-in scheme with clearly defined minimal data of the current Responsible Parties' data to be shared with the DCC as a mediator. They believed that this would help to immediately alleviate the current number of Communications Hubs being held in various parties' warehouses.

This was to be investigated during the development stage with many Parties requesting simplification and efficiencies of the Communications Hubs returns process can be made. Details of the investigations are noted in the 'Observations on the issue' section below.

How far will this issue grow as 2G/3G Communications Hubs are replaced?

SECAS notes that the transition to 4G Communications Hubs in 2025 will likely drive a large increase in Communications Hubs affected by this issue. Attendees at a DCC Returns workshop queried DCC about costs and volumes of Communications Hubs in supply chain at point of transition in 2025. The DCC provided information suggesting they expect c.200-300k Communications Hubs to be surplus to requirements. There was consensus to limit Communications Hubs surplus to requirements; with options to increase exchanging Communications Hubs between Parties who have surplus, limiting new orders, and having a fit for purpose returns process. The business case for the modification will be affected by these outcomes and monitored by the Communications Transition Group (CTG) as industry transitions to 4G Communications Hubs.

Sub-Committee input

SECAS has engaged the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), Privacy Sub-Committee (PSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS has received input from the following Sub-Committees to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Input on Proposed Solution and review process for smoother and easier Communication Hub returns process for all Parties involved
PSC	We do not believe this has any PSC impacts
SMKI PMA	We do not believe this has any SMKI impacts
SSC	Feedback on any security impacts based on the Proposed Solution developed
TABASC	Feedback on potential changes to business process and changes to SRVs based on the Proposed Solution developed

Observations on the issue

DCC Returns Workshop discussion

The Communications Hubs returns process was discussed at the DCC Returns Workshop in July 2023. 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 fit for purpose process to address issues now and for future volumes Communications Hub returns.

Below are some of the discussion points of the workshop:

- There is a disconnect between meter installers that are removing Communications Hubs and the 'back office', to create SRV for returns within current SLA, and growing number of Communications Hubs Parties don't own in their possession.
- Views expressed that a simplified process is needed and that removal of the 90-day SLA would help, along with removal of mandatory SRV from Current Supplier to the DCC:
 - Questions raised as to the implications of removing the SRVs and leaving this up to the DCC (via their CSPs) to complete upon return.
 - It was noted that more than one SEC Party has invested in systems/process to make the current process work and have capability for multiple/bulk SRV returns. While Other SEC Parties have not.
 - Noted that previous attempt to raise a Bulk Returns Process ([MP117 'Bulk CH returns'](#)) had failed on grounds of costs and lack of necessity for all.
- The DCC has had exploratory talks with DCC Service Providers (SPs) about potential simplification, however. there was no detail on system changes, time or potential costs mentioned.

The outcome of the DCC Workshop was for this Modification to be raised, and the DCC has committed to have regular call about returns process each month with SEC Parties to work through issues and progress – this will be aligned with Supply Chain Working Group monthly meetings.

Bulk returns request tool

The Proposer's organisation is currently in development of a bulk returns request tool and are aware there are several other SEC Parties who have already invested to have their own bulk returns request tool. Currently, the Proposer and others without a bulk returns request tool are needing to raise individual SRs for each Communications Hub they wish to return to the DCC. The Proposer also noted that they would not want any amendment of the Communications Hubs returns process to interfere with this. As this portion of the issue has been previously discussed under [MP117 'Bulk CH returns'](#), which was ultimately withdrawn due to the cost involved, the Proposer has requested that a bulk returns request tool not be included as part of this modification.

DCC Supply Chain Working Group discussion

This modification was discussed at the DCC Supply Chain Working Group in December 2023. There was agreement amongst attendees that the timeline for when this modification might get a solution in place is too far in the future. There were concerns that this would not alleviate issues in time for 4G rollout. There was agreement that the current process does not work well and has led to this issue of non-Responsible Parties in possession of Communications Hubs which they are unable to do anything with. Attendees felt there needed to be a quicker solution to resolve the current unidentified Communications Hubs in their possession, as this has a direct impact for Meter Asset Providers (MAP) and Suppliers. There was a request for the DCC to investigate a possible Communications Hub amnesty until this modification can look into an enduring solution which is future proofed.

Solution development

The Proposer has noted a high-level Proposed Solution whereby they need a path to return Communications Hubs to the DCC.

Solution Options

Before landing on the above Proposed Solution, the DCC had produced three Solution Options as described in the Solution Development Section.

Solution Option A

SEC Parties to return Communications Hubs to the DCC using the current method via the CSPs. The DSP will provide an interface for CSPs (and potentially in future the Accenture Device Manager to accommodate 4G Communications Hubs) to notify the DSP of a Communications Hub which has been returned. Upon notification of a Communications Hub being returned via this interface, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

Solution Option B

SEC Parties to provide the DCC with a list of intended Communications Hubs for return. The DSP will provide an interface via the SSMI for DCC to notify the DSP of Communications Hubs SEC Parties want to return. The DCC will validate the Communications Hubs returns request, by informing SEC Parties of which Communications Hubs listed requires the DCC to set the SMI status to ‘Decommission’ in order to process the Communications Hubs return. Upon the DCC receiving ‘sign-off’, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

Solution Option C

SEC Parties to return Communications Hubs to the DCC using the current method via the CSPs. There will be process changes to the DSP and DCC Service Management System (DSMS) and will provide three possible routes for the Communications Hub return record to be created in DSMS. The three routes are, firstly upon receiving SRV8.14.3 and SRV8.14.4, the DSP will trigger an Application Programming Interface (API) call to DSMS to create the Return Record. Secondly for returns within CSP South & Central, the CSP will trigger API call to DSMS to create the unsolicited Return Record. Lastly, the DCC Logistics team will manually create an unsolicited Return Record for CSP North. Following this, the DSP will set the status of the CHF (and its associated GPF) to “Decommissioned” in the SMI. The returned Communications Hubs will then be processed for reuse or recycle.

SEC Parties can still return Communications Hubs via the existing process and the above Solution Options will sit alongside it.

These options were discarded in favour of the Proposed Solution.

Requirement Workshop

During the development of the business requirements, it was noted with the current Communications Hub returns process, CSPs are only able to process 'Decommissioned' or 'Pending' Communications Hubs. They added that the DCC did not want to encourage 'bad behaviour' of DCC Users, noting that any solution developed should be used only if Parties are unable to return Communications Hubs via the current returns process.

Working Group

The business requirements were discussed at the Working Group in April 2024. The Working Group agreed that the business requirements addressed the issue, and the modification should proceed with the request of the DCC Preliminary Assessment.

The DCC Preliminary Assessment was discussed at the Working Group in September 2024. SECAS and the DCC confirmed that all Communications Hubs are in scope, however the DCC Preliminary Assessment costings are based on 2G and 3G Communications Hubs, and the 4G Communications Hubs costs would be additional. The Working Group queried if both solutions were able to be scaled up when 2G/3G sunseting begins, which the DCC confirmed there are no scaling concerns. The Working Group noted that a slicker Communications Hubs returns process for a higher price could be worth it for the correct solution. The Working Group noted that both options would impact SEC Parties, as a non-Responsible Party would now be able to return a Communications Hubs to the DCC.

The Working Group queried at what point in the new process with payments stop for the Responsible Party. The DCC noted they have drafted an Alternative Returns for Communications Hubs Guidance document (see Annex C), which will layout the charging plan, and this would be further refined as part of the DCC Impact Assessment. The DCC noted that the party in possession' where they are not the Responsible Party, are not paying any Communications Hub charges, so the DCC charges the Responsible Party. Working Group members agreed the Proposed Solutions deliver the business requirements; however, they were evenly split on whether to proceed with Solution Option A or B.

Solution Option C was presented to the Working Group in October 2024. Working Group members raised security concerns and if the DSP would do additional checks to ensure Communications Hubs returned were not communicating before processing. The DCC noted that if the Communications Hub is still communicating, the DCC will stop and not process the return, and will go back to the Responsible Supplier/returning party. They added that they presented this new Proposed Solution to the SSC in late September 2024, and they had feedback (noted in the slides). They noted these security concerns would be addressed as part of the DCC Impact Assessment. Working Group members queried if the billing process being streamlined and highlighted that CSP North Communications Hub Returns billings are not working as they should. The DCC noted there is a large number of lost and stolen costs to industry each year. They advised there needs to be work done on billing which needs to be addressed alongside this modification.

Working Group members agreed Solution Option C should be progressed and request a DCC Impact Assessment.

The DCC Impact Assessment was discussed at the Working Group in January 2025. The Working Group queried what type of validations are the DCC Logistics team doing for the three Use Cases. The DCC stated there is no validation nor impact on the DCC Logistics team, as they will use the current processes. They added that using the existing process was directed by the SSC, which recommended the DCC to not have any manual nor DCC Logistics intervention in facilitating the

Communications Hub returns process. The Working Group queried if the DCC Logistics team validates the correct GUIDs for returns. The DCC advised that the validation will be completed automatically by the DSP. They added that the DCC Logistics team will follow the same process now, which involves checking the pallet and Communications Hubs on the pallet with the existing ticket in the SMSR.

OPSG views

The business requirements were discussed with the OPSG in April 2024. The OPSG requested more clarity on processed and charges, and to consider using the refurbishment process. They agreed that the modification should proceed with the request of the DCC Preliminary Assessment.

The DCC Preliminary Assessment was presented to the OPSG in September 2024 where there were no comments at this stage.

SSC views

The DCC Preliminary Assessment was discussed with the SSC in August 2024. The SSC noted no security implications and would like to regular updates as this modification progresses.

The DCC presented Use Case scenarios to the SSC in November 2024. The SSC requested the DCC to use existing Communications Hubs returns processes and recommended not to have any manual interventions when facilitating the Communications Hub returns process.

SECAS and DCC presented the DCC Impact Assessment additional validations for Use Case scenarios to the SSC in January 2025. The SSC were satisfied with the business process authentications (which are similar to Anomaly Detection Thresholds (ADTs)), the process 'touchpoints' to relevant SEC Parties and the increased validations were suitable. The SSC noted there is possibly impacts on the Certificate Policy or the SEC Appendix D 'SMKI Registration Authority Policies and Procedures' (SMKI RAPP). SECAS and the DCC noted they would investigate the impacts and, if needed, include them into the legal text accordingly. Following the SSC meeting, SECAS and the DCC investigated and have found impacts to SEC Appendix Q 'IKI Certificate Policy', they have been included into the legal text.

Refinement Consultation responses

All Refinement Consultation respondents were supportive of the modification.

One Respondent (Large Supplier) preferred Solution Option B, due to the costs and shorter delivery time.

Another Respondent (Large Supplier) preferred Solution Option A, as it was a cleaner approach, with less ongoing costs and complexity for the Respondent. They added that there needs to be more work done to try and reduce the implementation approach in order to realise the benefits and support the transition to 4G Communications Hubs. They added that Solution Option B would add complexity and costs due to multiple handling of the returned Communications Hubs. They noted that although agree in principal that the modification should be approved, more details around the costings are required. They added that more information and detail is needed to understand how the DCC concluded with the 'Deemed Removal Date' noted in the DCC Guidance Document.

Another Respondent (Large Supplier) highlighted that Solution Options A and B would appropriately handle the issues outlined. They added that although Solution Option A is more expensive, it would be less reliant on DCC user input, whereas Solution Option B carries a lower cost but more input from DCC users. They added that there is a potential that this activity will improve the Smart Meter data quality around removed CHF's, which stands to bring benefits to all DCC Users.

Discussions at CSC

At the January 2025 CSC, a CSC member noted this modification was discussed at Communications Transition Group the day before, and it was suggested that SEC Parties to segregate their Communications Hub returns into fault and non-fault bundles when returning to the DCC. SECAS and the DCC noted that there is no change to the existing returns process, therefore MP252 will not be requesting SEC Parties to segregate their Communications Hub returns. The CSC member added that even if they were able to segregate the returns, there was still a bottleneck to ship the Communications Hubs back to the DCC and queried the reason there was a limit for each CHUB file. The DCC noted that the CHUB file limit of 1,000 was a limit suggested by the SSC. A CSC member noted that only DCC Users with access have been signed off by the SSC and didn't understand why a limit was needed. The DCC noted that the CHUB file submission follows the same path as ADT files, which is signed by the submitting DCC User and returned to the same DCC User.

8. Case for change

Business case

Implementing this modification will create a route for SEC Parties to return Communications Hubs in their possession, where they are not the Responsible Supplier.

Many Parties are in support of a review and update of the Communications Hub returns process, and all Refinement Consultation respondents were supportive of the modification.

The current Proposed Solution has considered the Refinement Consultation responses and the Working Group was supportive.

The DCC Logistics team has estimated since 2020, DCC Customers have paid approximately £4.3 million (£1.7 million for 2024 alone) in Lost or Stolen³ charges, which might have been avoided if DCC Customers were able to return Communications Hubs directly to the DCC.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (a)⁴, as it will allow existing stock to be reused or recycled in the supply chain of Communications Hubs, and their critical

³ Lost or Stolen is the category for Communications Hubs (and Devices) that haven't been returned to DCC and are not "on the wall".

⁴ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

components allows Device procurement to operate more efficiently and provides assurance to DCC Users on stock levels so that they can effectively plan installations.

Industry views

The Working Group were supportive of the modification.

Two Refinement Consultation respondent believed that this modification better facilitates General SEC Objective (a) and (g)⁵, with one of the respondents also believing it would better facilitate General SEC Objective (d)⁶.

Views against the consumer areas

Improved safety and reliability

This modification will be neutral against safety and security for consumers.

Lower bills than would otherwise be the case

This modification will have an indirect positive impact against this consumer benefit area, as it will reduce additional costs that will not be further passed onto consumers.

Reduced environmental damage

This modification will ensure the Communication Hubs are able to be reused or recycled where possible.

Improved quality of service

This modification will be neutral against this consumer benefit area.

Benefits for society as a whole

This modification will be neutral against this consumer benefit area.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	5 Oct 2023

⁵ Facilitate the efficient and transparent administration and implementation of this Code.

⁶ Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy

Timetable	
Event/Action	Date
Presented to CSC for initial comment	17 Oct 2023
CSC converts Draft Proposal to Modification Proposal	19 Dec 2023
Business requirements developed with Proposer and the DCC	20 Dec 2023 – 15 May 2024
Modification discussed with the Working Group	3 Apr 2024
Business requirements discussed with OPSG	9 Apr 2024
Preliminary Assessment requested	1 Jul 2024
Preliminary Assessment returned	6 Aug 2024
Preliminary Assessment discussed with SSC	28 Aug 2024
Preliminary Assessment discussed with Working Group	4 Sep 2024
Preliminary Assessment discussed with OPSG	10 Sep 2024
Refinement Consultation	18 Sep – 9 Oct 2024
Modification discussed with Working Group	2 Oct 2024
Impact Assessment costs approved by Change Board	23 Oct 2024
Impact Assessment requested	24 Oct 2024
Impact Assessment returned	31 Dec 2024
Modification discussed with Working Group	15 Jan 2025
Modification Report approved by CSC	21 Jan 2025
Modification discussed with SSC	22 Jan 2025
Modification Report Consultation	29 Jan – 18 Feb 2025
Change Board Vote	26 Feb 2025

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
ADT	Anomaly Detection Threshold
API	Application Programming Interface
ARO	Authorised Responsible Officer
CH	Communications Hub
CHF	Communications Hub Function
CHUB	Communications Hub Update Bulk
CSP	Communications Service Provider
CTG	Communications Transition Group
DCC	Data Communications Company

Glossary	
Acronym	Full term
DSMS	DCC Service Management System
DSP	Data Service Provider
DUIS	DCC User Interface Services
FTE	Full-time employee
GPF	Gas Proxy Function
GUID	Global Unique Identification
MAP	Meter Asset Providers
MAM	Meter Asset Manager
MOP	Meter Operator
OPSG	Operations Group
PIT	Pre-Integration Testing
PSC	Privacy Sub-Committee
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	service level agreement
SM WAN	Smart Metering Wide Area Network
SMI	Smart Metering Inventory
SMKI	Smart Metering Key Infrastructure
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMKI RAPP	Smart Metering Key Infrastructure Registration Authority Policies and Procedures
SMSR	Service Management Service Request
SP	Service Provider
SRV	Service Request Variant
SSC	Security Sub-Committee
SSI	Self-Service Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integration Testing

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MP252 ‘Amending the process for Communications Hub returns’

Annex A

Business requirements – version 0.5

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 Data Communications Company (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. This section contains a must-have (M), should-have (S), could-have (C), won't-have (W) (MoSCoW) analysis for the different requirement components to be considered as part of the solution.

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

2. Considerations and assumptions

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

2.1 General

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

The aim of the solution is to allow SEC Parties, including non-responsible Parties, to return any Communications Hubs to the DCC in any state, and providing the DCC Service Providers with the ability to deal with that return.

This solution will be applicable to all SEC Parties.

2.2 Requirement 1: The DCC shall develop a mechanism whereby SEC Parties, including non-responsible Parties, shall notify DCC when they want to return Communications Hubs

SEC Parties can often be in possession of Communications Hubs that have not been Decommissioned correctly, and that they are not the current responsible Party for the Communications Hubs. One scenario where this occurs, is where a Change of Supplier (CoS) process has failed to change the responsible Party, or a current Supplier fails to Decommission at point of Communications Hubs removal and subsequently, the Consumer proceeds with a CoS.

The Proposed Solution will require the DCC to design a mechanism, or use an appropriate existing mechanism, for SEC Parties to notify the DCC of the Communications Hubs they want to be returned. This notification should have relevant fields to account for how many Communications Hubs will be listed for return and to specify:

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

2.3 Requirement 2: The DCC shall develop a mechanism to allow non-responsible Parties to return Communications Hubs, where the Communications Hub state in the SMI is 'Commissioned' or 'InstalledNotCommissioned'

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 Communications Hubs with SMI state of 'Decommissioned'.

Current Permitted Communication Hub Returns	
User Role	SMI state
Import Supplier	'Pending', 'Commissioned', 'Decommissioned' and 'InstalledNotCommissioned'
Responsible Supplier Agent (RSA)	'Pending' and 'Decommissioned'

The mechanism will need to allow both User types to be able to return all Communications Hubs regardless of SMI state.

2.4 Requirement 3: The DCC shall develop a mechanism to check all intended Communications Hubs returns for their current SMI state

The DCC will need to design a mechanism, or use an appropriate existing mechanism, to 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 explicit permissions by the DCC before accepted for return. This validation is to denote what the current SMI state of all Communications Hubs which SEC Parties have notified intention to return. The possible Communications Hubs SMI states are 'Pending', 'Commissioned', 'Decommissioned' or 'InstalledNotCommissioned'.

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

2.5 Requirement 4: The DCC shall notify SEC Parties whether their request for Communications Hubs return has been accepted or rejected

The DCC will need to design a mechanism, or use an appropriate existing mechanism, for the DCC to notify the SEC Party of whether the Communications Hub return request has been accepted or rejected.

- 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 Communications Hubs in a single return request for the region). The SEC Party shall then send an amended notification in accordance with Business Requirement 1.

2.6 Requirement 5: The DCC shall notify the responsible Party of Communications Hubs in the returns process that the DCC has in their possession

The DCC will need to develop a mechanism, or use an appropriate existing mechanism, to notify the responsible Party of the status of returned Communications Hubs after they have been processed by the DCC, and advise which were successfully processed for reuse and which would be recycled.

2.7 Requirement 6: The DCC shall process the accepted Communications Hubs

The DCC will need to develop a mechanism, or use an appropriate existing mechanism, for the returned Communications Hubs to be processed for reuse or would be recycled, without needing the responsible Party to send the Service Request 8.3 'DecommissionDevice'.

The new Code Required Document 'Alternative Returns for Communications Hubs' will provide guidance for which the DCC will need to ensure the developed mechanism will operate as intended.

2.8 Requirement 7: The DCC shall develop a mechanism to investigate and charge the responsible Party for the non-compliant returned Communications Hubs

The DCC will need to develop a mechanism, or use an appropriate existing mechanism, to investigate and charge the responsible Party appropriately for the non-compliant status of the returned Communications Hubs after they have been processed. This includes the possibility of a different charge for correctly 'Decommissioned' Communications Hubs and any other state other than 'Decommissioned' Communications Hubs.

The new Code Required Document 'Alternative Returns for Communications Hubs' will provide scenarios for which the DCC will need to ensure the developed mechanism will operate as intended.

2.9 Requirement 8: The DCC shall accept the return of end-of-life Communications Hubs

The DCC will need to develop a mechanism, or use an appropriate existing mechanism, to support the return of end-of-life Communications Hubs, which will enable SEC Parties to return Communications Hubs to the DCC during transitional phases.

This requirement has been noted as a should-have requirement, as when a Communications Hub does reach end-of-life, they would need to be returned to the DCC. As of January 2024, there is no finalised plan of what SEC Parties are to do with any end-of-life Communications Hubs.

2.10 Requirement 9: The DCC shall develop and provide regular Reporting to monitor Communications Hub returns data

The DCC will need to develop a reporting mechanism, or use an appropriate existing mechanism, which will allow SEC Parties to see where their returned Communications Hubs are in the process. The reporting is to only include two stages; one upon receipt by the CSP of each Communications Hub and another once triage is completed.

This requirement has been noted as a should-have requirement, as the DCC has noted there is potential to increase a current Communications Hubs returns report in frequency which could suffice.

There should be consideration of any wider industry reporting which may need to incorporate this returned Communications Hubs data.

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
CSP	Communications Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
GUID	Global Unique Identification
RSA	Responsible Supplier Agent
SEC	Smart Energy Code
SMI	Smart Meter Inventory
SSC	Security Sub-Committee

SEC Modification Proposal, SECMP0252, DCC CR5414

Amending the Process for Communications Hub Returns

Full Impact Assessment (FIA)

Version:	0.53
Date:	10th January 2025
Author:	DCC
Classification:	DCC PUBLIC

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1 Executive Summary

The Change Board are asked to approve the following:

- Cost cost to implement SECMP0252 Amending the Process for Communications Hub Returns of **£329,626**, which comprises:
 - £232,006 in Design, Build, and Pre-Integration Testing (PIT)
 - £97,620 in Implementation, including integration testing and deployment
- In addition, an annual operating charge of £24,563 for the first year
- Expected effort of nine months to complete with a target release of November 2025.

Problem Statement

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. DCC has identified over £4million of “Lost or Stolen” costs charged to industry over the last three years attributable to such problems. 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.

In addition, the volumes of Comms Hubs being returned to the DCC will increase to an expected level of 140,000 per month as a result of the 2G/3G Sunsetting and 4G Comms Hubs and Networks programme. Any Comms Hubs that are not in the state of Decommissioned currently cannot be processed either for triage or scrapping.

Storing Comms Hubs in warehouses incur ever increasing 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. There are multiple validations of the Comm Hubs returns as requested by the Security Sub-Committee ensuring simple but secure functionality for the returns.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
18/12/2024	0.1	Initial version, for DCC internal review
23/12/2024	0.52	Post review, approved costs
10/01/2025	0.53	Label changed in Use Case 3 sequence diagram

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	05/07/2024
2.	MP252 Business Requirements v0.5	SECAS	02/07/2024
3	SECMP0252 CR5414 - PIA - Amend Process for Comms Hub returns v0.51	DCC	28/08/2024

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, and submitted on the 6th August with two solution options.

The FIA was requested on 29th October 2024.

3 Context and Requirements

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

The requirements have been provided by DCC, SECAS, the Proposer, and the Working Group, and have been validated by SSC and TABASC.

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. The volumes of Comms Hubs being returned to the DCC will increase to an expected level of 140,000 per month as a result of the 2G/3G Sunsetting and 4G Comms Hubs and Networks programme. Any Comms Hubs that are not in the state of Decommissioned currently cannot be processed either for triage or scrapping.

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.

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 results in incorrect charges placed on Suppliers for Comms Hubs no longer at a consumer’s premises, nor in 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.

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.

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

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. 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 only able to return Comms Hubs with a 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', while 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 Party² 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 7 will be implemented by DCC with changes to the reporting outside the scope of the system changes.

Requirement 8, “The DCC shall accept the return of end-of-life Comms Hubs”, will enable SEC Parties to return Comms 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 Cases

Any DCC User can return a Comms Hub to the DCC. At the highest level, there are some scenarios where Comms Hub returns are received by Device Managers for refurbishment where the Comms Hub has not been decommissioned. When this happens, DSP rejects any Unlock command subsequently received. The issue is the system state when they are returned.

Three key Use Cases have been identified:

- | | |
|---------------------------------|--|
| 1. Full Process | For a Comms Hub to be decommissioned, Users carry out a successful SRV 8.3, Decommission Device followed by 8.14.3, CommsHubStatusUpdate-FaultReturn or 8.14.4, CommsHubStatusUpdate-NoFaultReturn to initiate the return of a Comms Hub |
| 2. Comms Hub Not Decommissioned | Omitted or Unsuccessful SRV 8.3 to initiate the return of a Comms Hub such that it is not Decommissioned in SMI |

In total, the above two Use Cases are expected to reach a peak of 140,000 Comms Hub returns per month when 2G/3G Sunsetting is in full swing.

- | | |
|----------------|---|
| 3. File Upload | Comms Hub not decommissioned including:
* MAPs who aren't the Responsible Supplier (8.14.3 and 8.14.4 rejected by DSP) |
|----------------|---|

² Responsible Party is the Party responsible for the ESME and CH

- * Damaged CHs meaning CH is good for disposal only with no 8.14.3/8.14.4 triggered
- * Accidental return of physical device where no 8.14.3 /8.14.4 triggered

One example of the third Use Case is as follows:

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 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.

There is a separate and additional Use Case where CSPs are in possession of returned, but not decommissioned, Comms Hubs. These cannot be processed by the changes associated with this Modification, but will need to be added by a separate change initiated by DCC.

Changes to the billing process are not included in this FIA, but the Deemed Removal Date³ will be used as the effective billing date, as defined in Appendix C at the end of this document.

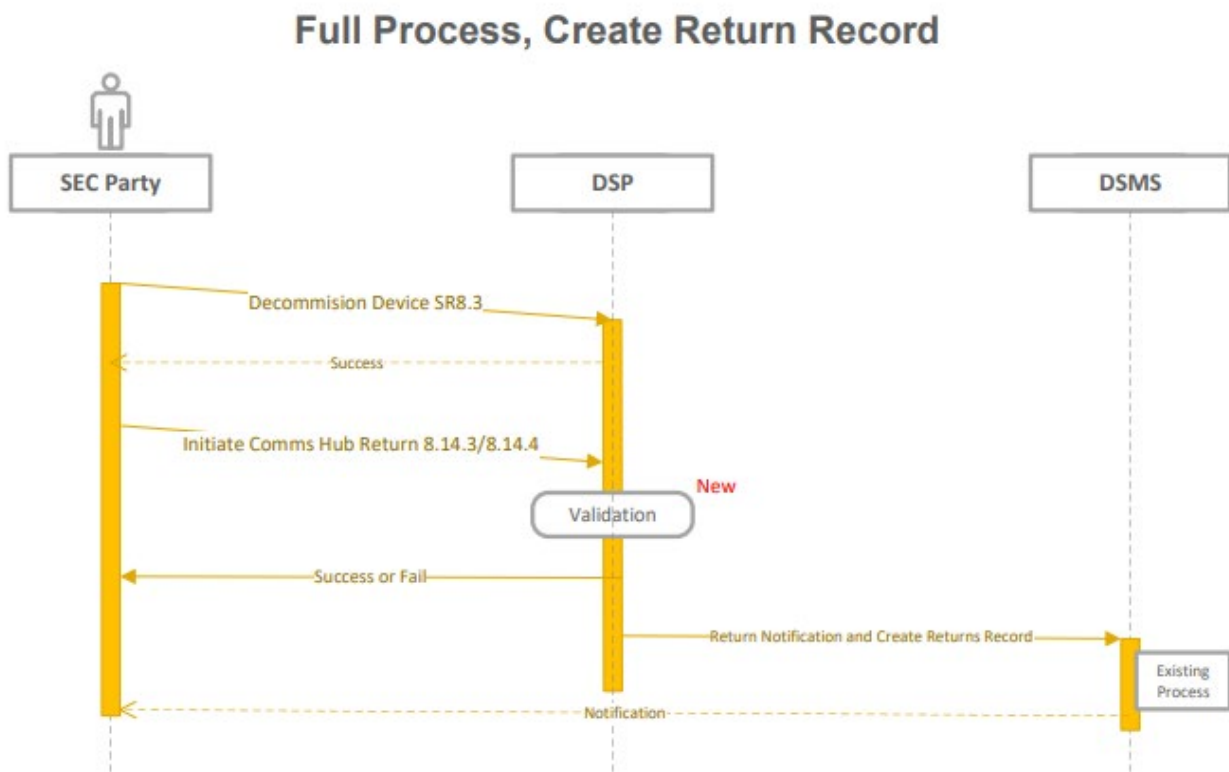
³ The final date on which communication was with the CH returned through the process set out in Appendix C.

4 Description of Solution

There are two Service Providers directly impacted by this Modification; DSP and DCC Service Management System (DSMS), as well as the DS&A Reporting team. The functionality associated with each Service Provider is described in the following sections.

4.1 Use Case Sequence Diagrams and Business Processes

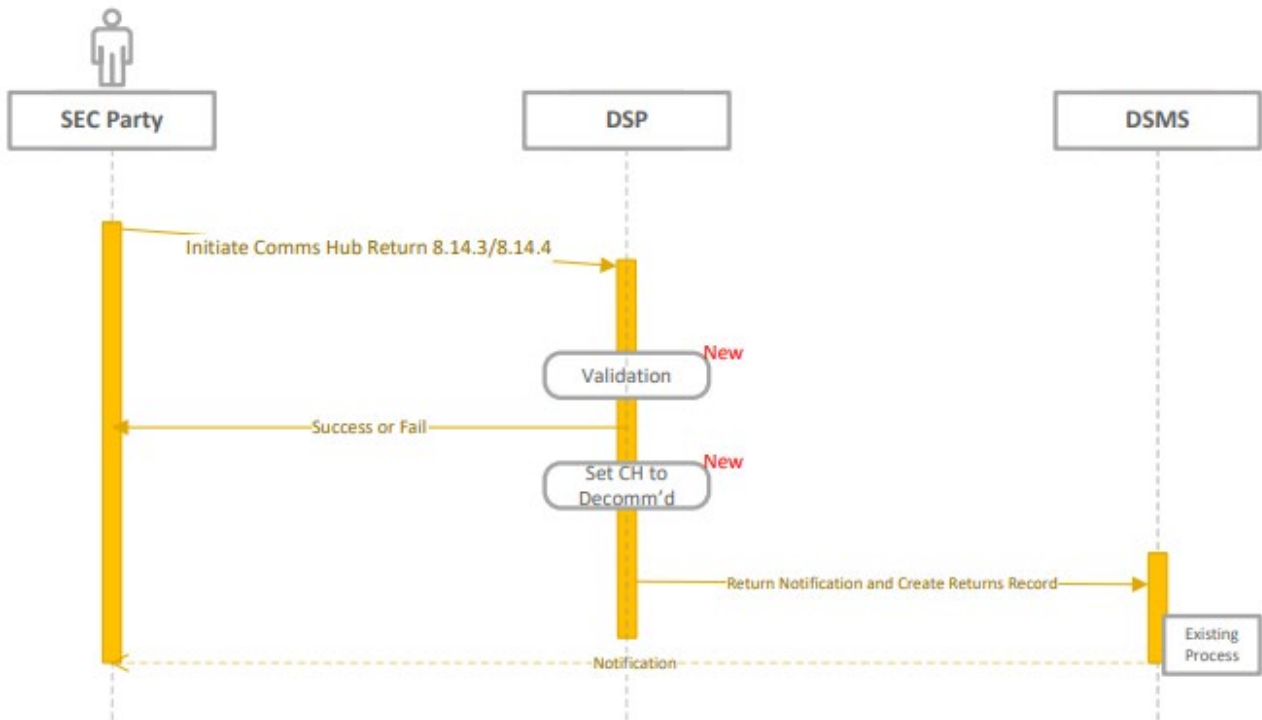
The solution components described in the following sections will be applied to each Use Case. More detail on the validation, alerts, and notifications are provided in subsequent sections.



This sequence diagram describes the DCC preferred process, and is sometimes referred to as the current “happy path”. In this Use Case, SEC Parties are able to send a SR8.3, Decommission Device, and when successful, the Comms Hub status in the SMI is updated to Decommissioned. This process does not apply to all Use Cases associated with Comms Hubs Returns as shown in the following sections.

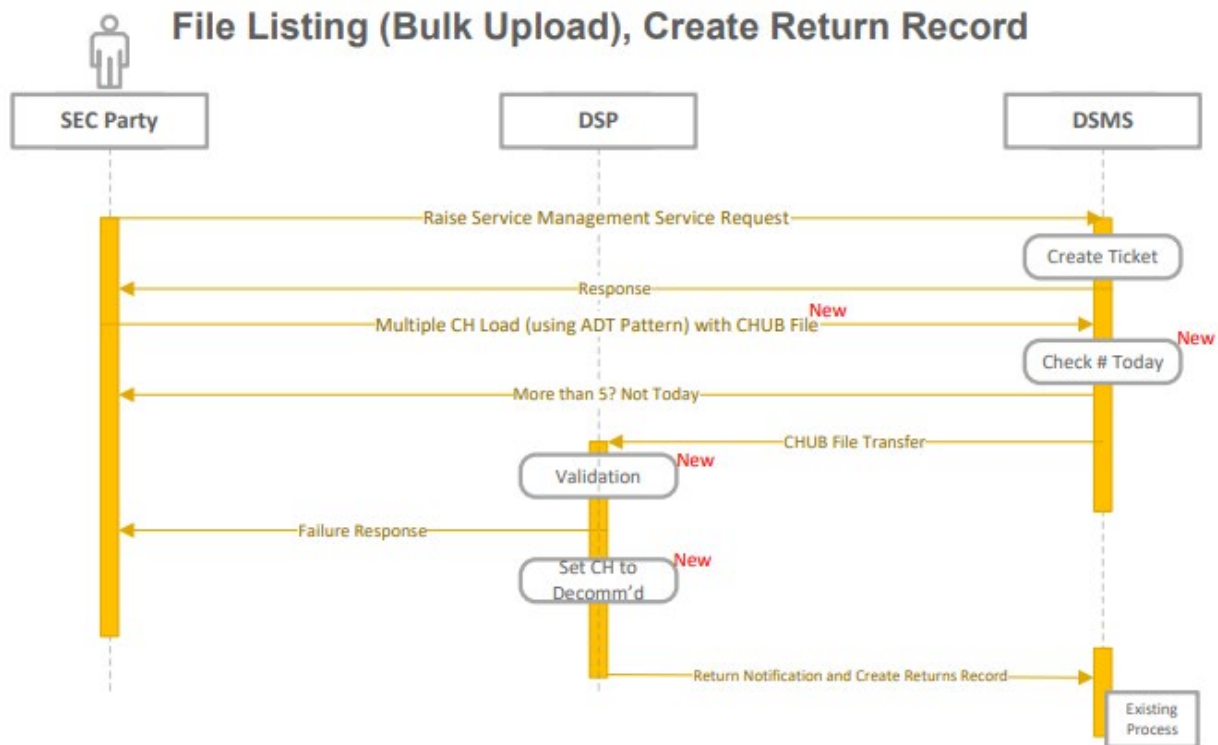
The DSP Validation as described in sections 4.1.1 and 4.1.2 following are consistent with the other two Use Cases for this Modification. In this Use Case, a Comms Hub that is successfully decommissioned by SR8.3 will always pass validation with a Return notification taking place, and a Return Record will be created in the DSMS.

Comms Hub Not Decommissioned, Create Return Record



In this Use Case, the Party holding the Comms Hub prior to return has either not submitted a SR8.3 for that device, or is unable to submit a successful SR8.3 as they are not the Responsible Party. This means that without updates the SMI status cannot be set to Decommissioned.

Once a Party submits a SRV8.14.3 or 8.14.4, and the Comms Hub GUID passes DSP Validation, it is set to a Decommissioned state in the SMI.



The Bulk Upload Use Case requires the User submitting a list of Comms Hubs IDs for processing to create a Service Management Service Request (SMSR) and then to submit a Comms Hub Update Bulk (CHUB) file containing a list of up to 1000 Comms Hubs IDs.

Prior to submission of the CHUB file, the DCC User shall follow the same pattern for ADT files by raising a SMSR via the Self-Service Interface (SSI) to obtain a reference number for use in its submission to DCC, where the reference number is generated by the SSI automatically. The User shall obtain submission approval from their own Second Line support and then sends a CHUB File to the DCC via the DCC's secure delivery method of choice. The User submission must include: (a) the SMSR reference number in the subject line of the submission, and (b) the CHUB file in the required format, digitally signed by a Private Key associated with a File Signing Certificate and provided to an Authorised Responsible Officer (ARO) in accordance with the SMKI RAPP.

The User updates the SMSR from the submission.

Validation and setting the Comms Hub status to Decommissioned follows the same pattern as the previous two Use Cases.

4.2 DSP Technical Solution

The solution for this SECMP0252 will amend the processing of fault and no fault returns Service Requests 8.14.3 and 8.14.4 to provide additional validation and to set Comms Hubs as decommissioned if necessary. There will also be a new capability via the DSP Access Layer to support a file upload for the CHUB file processing.

4.2.1 Validation Carried out by DSP

On receipt of the CHUB file from the DSMS, the DSP shall:

- a) Check cryptographic protection applied to the Comma Separated Variable (CSV) CHUB file and confirm the validity of the Certificate used.
- b) Confirm that the sequence number contained within the CHUB File is greater than the sequence number contained within any previous CHUB File that the DCC has successfully validated and processed in relation to the User ID specified within that CHUB.
- c) Without manually opening the file check that the CHUB file contains only registered Comms Hub GUIDs on the SMI, does not contain more than 1000 Comms Hubs, and check that the format of the CHUB File is correct. Any rejection should stop process and inform the submitter.

The revised processing for SRV 8.14.3 and 8.14.4 will include the following additional behaviour:

1. amend the validation to include a check that the Comms Hub is not still communicating by checking the last communication time of the CHF, GPF, and any ESME which is joined to that Comms Hub.
2. if any last communication time is less than 35 days ago (where this is a configurable value), then the Service Request shall be rejected with a new DUIS Error Code. The parameter for this last communication time as initially set as 35 days (after consultation with SSC) and can be changed through a maintenance release if required.
3. amend the processing so that where the Comms Hub is not decommissioned (and a warning status is returned) then perform the decommissioning steps as per Service Request 8.3. Note that this step will include any DCC Alerts which are normally produced when processing Service Request 8.3.

If all the validation is passed, processing then commences. If a Comms Hub ID fails validation, it is excluded from processing and the DCC User notified. Successful processing is also notified to the DCC User.

4.2.2 DSP Access Layer

The DSP Access Layer has been created to act as a new interface between the DSP and the SSI, SSML, and Service Now functionality. Changes specific to this Modification include additional new element:

- Add the CHUB file type to the API which will pass the file to the DSP Data Management component to perform initial validation
- Add the CHUB file type to the Data Management component to start processing the file.
- Add a new API call to request the CHUB file processing outcome which will contain, for each CHF in the input file, the result of initial validation and, where applicable, the result of the processing

4.2.3 Request Management

Changes to the (Service) Request Management include:

- Amend the strategy code for SRVs 8.14.3 and 8.14.4 to include a check that the Comms Hub is not communicating, which will review the last comms time of communication for each of the CHF, GPF and any ESME on the HAN
- New error code to be added to DUGIDS and DUIS to report failure

4.2.4 Data Management

Changes to this component will include:

- Add a web service in the DSP Access Layer to accept the CHUB file, perform initial validation (signature check, check sender is a supplier, check all entries are EUI-64 format) and then initiate the other validation processes.
- Validation of the file, checking that all entries are for SMETS2 CHFs.
- Add a web service to call Request Management to process the Service Request then convert the ResponseCode from this request into an appropriate status and record that status for inclusion in the outcome report.
- Amend processing of 8.14.3 and 8.14.4 so that where the device is not decommissioned, and call the decommission processing method.
- Add a new report for a given CHUB file to select all records for the file and the validation and processing outcome.
- Add database tables for CHUB files and file records.
- Housekeeping activities will remove data for files [7 days] after uploading.

4.2.5 Technical Specifications

Changes to DUIS and DUGIDS are required to add a new error code for 8.14.3 and 8.14.4, as well as describing the post processing steps to set the Comms Hubs status as Decommissioned.

The proposed DUIS changes are provided below.



DUIS Legal Text
changes for SECMP02

4.2.6 Data Model

While there are no changes to the data model, status values for a Comms Hub will be updated if all validation checks are passed.

4.2.7 Infrastructure Impact

There is no impact to infrastructure as part of this Modification. Additional processing and storage are likely to be required. However, they are not sufficiently large to warrant the procurement of additional compute power or storage.

4.2.8 Other DSP Changes

The Modification does not impact the DSP resilience or Disaster Recovery implementation.

No impact on performance is anticipated, although should be monitored.

No penetration testing will be required, and DSP anticipate no material impact to the DSP security implementation as the solution proposed is making use of pre-set patterns which are security assured.

4.3 DCC Service Management System Changes

Note the Future Service Management (FSM) programme is scheduled to replace the existing DSMS components, including Remedy, the SSI, and SSML with a single solution based around Service Now.

The DSMS function for the Bulk Upload Use Case will function with a SMSR, log any rejected files, and in all cases, create a Returns Record for successful SMI state changes to Decommissioned. For any valid CHUB file(s) submitted as part of a Bulk Upload, the DSMS will upload the file to the DSP an interface as defined within the DSP Access Layer (DAL).

4.3.1 Validation Rules Carried out by DSMS

On receipt of a valid SMSR and CHUB file, the DSMS must check that no more than five CHUB files have been submitted by the same User on the same day. Any rejection should be highlighted on the associated SMSR, and the request halted until rectified (removed) and resubmitted by the DCC User. For the number of files, the ticket raised is updated for querying with submitter.

4.4 Data Science and Analytics Team

New reporting will allow SEC Parties to see where their returned Comms Hubs are in the process. The reporting will include two stages; the first upon receipt by the SMETS 2 Communications Service Providers (CSP) of each Comms Hub in the Decommissioned state, and another once triage is completed. DS&A have noted there is potential to increase a current Comms Hubs returns report in frequency which should suffice and avoid create new reports.

The format and content of the reports as well as the delivery method will be finalised in the Detailed Design stage of the implementation.

5 Implementation Timescales and Approach

The pre-integration phase is expected to take approximately four months up to the end of Detailed Design, Build, and Pre-Integration Testing (PIT). Allowing for post-PIT integration testing, the change will be ready to schedule to a production release after approximately nine months, which allows for a defined period of User Integration Testing (UIT) common to previous Releases, even though there is no stated requirement for functional UIT.

DCC anticipates the change will be implemented in the November 2025 SEC Release.

5.1 DSP Pre-Integration Testing

The PIT testing will include the following:

- Testing a new DAL interface to allow DCC Service Users to submit bulk lists of Comms Hub IDs
- Validation of submitted CHUB files and Comms Hub IDs
- The new outbound interface to deliver validation reports for the file upload mechanism to the Integration Layer.

Automated testing will be used where possible, and no performance testing is required for this change.

5.2 System Integration Testing (SIT)

This SIT response covers only activities and deliverables that are specific to functionality in this Modification. The SIT team will plan, prepare, and execute tests that demonstrate the correct behaviour of the Change, verifying the change to a Decommissioned status in the SMI for validated Comms Hubs IDs.

For each device set required for both DSMS and DSP SIT testing:

- using DSMS to process a bulk return with Comms Hubs uploaded in a file
- uploading a file of Comms Hubs via DSMS that contains at least one Comms Hub that fails validation with a return record is not created for that Comms Hub
- verifying that the outcome report file is sent showing which Comms Hub was not decommissioned and returned.

To carry out the scope of SIT testing, EDML, Toshiba, and 4G Toshiba Comms Hubs will be required, each with ESME, GSME, and PPMID devices, where the Comms Hub needs to be active in order for validation to fail. For the remainder of the testing, dummy Comms Hubs can be used where only the EUI-64 Id is required for the pre-notification and subsequent decommission request.

There is no requirement for SMETS1 devices.

The number of tests and durations for the functional SIT testing is expected to be as follows.

Test Phase	Type	Total Tests	Plan Start	Plan End	Workdays	Envir Avail	Net Days	Re-Test	Total Test	Test per Day
I&C incl Decom.	Automated	83	01/07/2025	14/07/2025	10	85%	9	1.1	91	10.7
I&C incl Decom.	Manual	7	01/07/2025	14/07/2025	10	85%	9	1.1	8	0.9
CHF Returns	Automated	41	01/07/2025	14/07/2025	10	85%	9	1.4	57	6.8
CHF Returns	Manual	53	01/07/2025	14/07/2025	10	85%	9	1.4	74	8.7
Totals/Averages		131	01/07/2025	14/07/2025	10	85%	8.5	1.8	230.6	27.1

5.3 User Integration Testing (UIT)

The scope of UIT testing has been kept to a minimum on the basis that the full new functionality provided for this Modification, including negative tests, will have been thoroughly tested in PIT and SIT. The UIT team will conduct tests to check the availability of the following functionality:

- Send a SR8.14.3 or SR8.14.4 service request to a single CH meter set:
 - for a Comms Hub that is not in the Decommissioned state, to check that the warning message W081401 is generated, the Comms Hub is Decommissioned, the Comms Hub Status is set to Returned and a Returns Record is created in DSMS
 - for a Comms Hub that is Decommissioned, the Comms Hub Status is set to Returned and a Returns Record is created in DSMS
- A CHUB file can be uploaded and processed successfully. The file will contain up to 3 Comms Hubs GUIDs (registered on SMI), all of which will have been off network and not communicating for the past 35 days.

5.4 Transition to Operations

All efforts and costs for these elements of the solution reflect Business as Usual support activities.

Knowledge transfer from the Development team to Application Management Services (AMS team) will be required with a review of the Production system configuration to ensure it can support the expected level of CHUB file processing.

The additional DSP functionality will require ongoing support. Typical incidents anticipated include queries from the DCC and SEC Parties, file signing and processing issues, performing general housekeeping, maintenance and responding to alerts. Consequently, the Contractor has made a conservative estimate that the Change will generate up to two low-complexity calls per month, which are expected to be enduring until 31st October 2026, which is the end of the current Term of the Agreement

6 Costs and Charges

This section indicates the costs for all phases of application development for this Modification. Note these costs assume a release of just this SEC Modification without any other Modifications or Change Requests in the release, and without the regression testing required during the Integration Testing, which is not truly reflective of the post-PIT test costs. A separate estimate of these costs is provided by DCC.

A detailed calculation of the two sets of costs will be carried out through a "Release CR" also referred to as a "Post-PIT CR" when the contents of the targeted SEC Release are finalised.

£	Design, Build, and PIT	Integration Testing, SIT and UIT	TTO	Application ⁴ Support	Total
SECMP0252	£232,006	£86,300	£11,320	£24,563	£329,626

Design	The production of detailed System and Service designs to deliver all 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.
Application Support	Each Service Provider has allowed for an increase of two low complexity support cases per month for the duration of eleven months, immediately following the release to Production. This is effectively a running charge, and is not included in the total cost of the change.

This Modification includes changes to DUIS which impact the Design, Build, PIT and integration testing phases. At the point at which the contents of a SEC Release become finalised, if there is

⁴ Not included in the total cost of the Modification, but as an annual charge for running costs

more than one release candidate change including DUIS charges, only one set of charges will be payable, since the DUIS changes required for the individual change will be carried out once only for the release. Such a sharing of costs will result in a reduction of charges for the DUIS components of this Modification in a SEC Release.

6.1 Changes to the Agreement

The DSP contract updates will be agreed and detailed within the Contract Amendment Note (CAN) and will impact the following schedules:

- Schedule 2.1 (the DCC Requirements): update to reflect the addition of new DCC Requirements to enable achievement of the activities and / or deliverables under this CR5414;
- Schedule 3 (the DCC Responsibilities): update to reflect the addition of new DCC Responsibilities to enable achievement of the activities and / or deliverables under this CR5414;
- Schedule 4.1 (Contractor Solution): Solution Design documents will need to be updated as per section 4.1;
- Schedule 6.1 (Implementation Planning): addition of new Milestones; and
- Schedule 7.1 (Charges and Payment): revisions to incorporate the charges and payment applicable for this CR5414.

There will be no updates to any other schedules not listed above as a result of this Change (including Schedule 2.2 (Performance Measures and Monitoring)).

Other Service Providers are not impacted.

Appendix A: Glossary

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

Acronym	Definition		(Identifier)
ADT	Anomaly Detection Threshold	I&C	Install & Commission
AMS	Application Management Support	MoSCoW	MoSCoW represents four categories of initiatives: must-have, should-have, could-have, and won't-have
API	Automated Programming Interface	PIA	Preliminary Impact Assessment
ASN	Advanced Shipping Notification	PiP	Party in Possession
CAN	Contract Amendment Note	PIT	Pre-Integration Testing
CHF	Comms Hub Function	RAID	Risks, Issues, Assumptions, and Dependencies
CH, Comms Hub	Communications Hub	RMA	Returns Material Authorisation
CHUB	Comms Hub Update Bulk (file)	ROM	Rough Order of Magnitude (cost)
CoS	Change of Supplier	RSA	Registered Supplier Agents
CR	DCC Change Request	SEC	Smart Energy Code
CSP	Communication Service Provider	SECAS	Smart Energy Code Administrator and Secretariat
CSV	Comma Separated Values	SIT	Systems Integration Testing
DAL	DSP Access Layer	SLA	Service Level Agreement
DCC	Data Communications Company	SMETS	Smart Metering Equipment Technical Specification
DSMS	DCC Service Management System	SMI	Smart Metering Inventory
DSP	Data Service Provider	SMSR	Service Management Service Request
DUGIDS	DCC User Gateway Interface Design Specification	SR	Service Request
DUIS	DCC User Interface Specification	SRV	Service Reference Variant
DS&A	Data Science and Analytics	SSC	Security Sub-Committee
ESME	Electricity Smart Metering Equipment	SSI	Self-Service Interface
FIA	Full Impact Assessment	SSMI	Self Service Management Interface
FSM	Future Service Management (programme)	TABASC	Technical Architecture and Business Architecture Sub-Committee
GBCS	Great Britain Companion Specification	TTO	Transition to Operations
GPF	Gas Proxy Function	UIT	User Integration Testing
GSME	Gas Smart Metering Equipment		
GUID	Global Unique Identification		

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.	Users 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
MP252-A3	The functionality of the DSMS will be taken up by the FSM programme.	This will require development, testing, and implementation by the FSM team.

Design Decisions

Ref	Description	Forum
MP252-DSD1	For Solution B, DCC Upload: a. files will be small (under 1000 CHF's); b. run frequency will be low (up to 5 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.	SECAS Working Group, October 2 nd , 2024
MP252-DSD2	DCC Users must not be able to open, or tamper with, any lists of Comms Hub IDs submitted by any DCC User.	SSC, 25/9/24
MP252-DSD3	Reject Solution Option A with CSP changes due to complexity, cost, and time to complete	DCC CTO, 9/9/24
MP252-DSD4	Expand scope and Use Cases to cover "Happy Path" and submission without completing 8.3 Comms Hub submission	SECAS Working Group, 2/2/24
MP252-DSD5	Apply validation parameters (SMI status, communications / off network) to all Use Cases	DCC CTO, 20/11/24
MP252-DSD6	Use ADT Pattern for CHUB file submission by Users	SSC, 27/11/24

MP252-DSD7	Set Exclusion Period for Comms Hub off network and not communicating = 35 days. This value is configurable	SSC, 27/11/24
MP252-DSD8	Apply validation parameters (Bulk Upload number of CHUB files, CHUB file format, number of CH IDs) to Bulk Uploads	SSC, 27/11/24

Appendix C: Draft Process for Alternative Returns of Communications Hubs



SECMP0252 CH
returns V0.3.docx



Alternative Returns for Communications Hubs

Version: DRAFT V0.4
Date: January 2025
Author: DCC Regulation

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1. Introduction

1.1. Document Purpose

1. This document has been published in accordance with Smart Energy Code (SEC) Section F8.9 (Alternative Returns for Communications Hub Document). It defines the rights and obligations on SEC Parties and the DCC in relation to the return of SMETS2+ Communications Hubs (CHs) to the DCC outside of the standard SEC requirements for the return of CHs.

1.2. Change Control

2. In accordance with SEC Section F8.9, DCC shall only make changes to this document where it has:
 - undertaken reasonable consultation with SEC Parties regarding proposed changes;
 - given due consideration to, and taken into account, any consultation responses received; and
 - received approval from the SEC Panel to make such changes.
3. Following SEC Panel approval of any changes DCC shall publish an updated copy of this document on the DCC Website.

1.3. SEC Obligations and Links

4. It is noted that:
 - a) the SEC Section F8 and other requirements describe the process that should be followed to remove and return CHs to the DCC;
 - b) that this process requires the SEC Party to send Service Request (SR) 8.14.3 and 8.14.4; and
 - c) that SEC Parties should follow those steps at all times where they are eligible to send these Service Requests.
5. It is also noted that;
 - a) SEC Section F8.7 gives each SEC Party the right to return a CH to the DCC at any time; and
 - b) there are times when a SEC Party is not eligible to send SR 8.14.3 or 8.14.4 wishes to return a CH. This document sets out the process to be followed by SEC Parties in order to return the CHs to the DCC where they are not eligible to send SR 8.14.4 or 8.14.4..
6. This document sets out scenarios where non-SEC compliant return procedures may be followed and how charges for those returned CH will be applied.
7. Any capitalised term has the meaning as defined in the SEC or as defined in this document.

2. CH in the possession of Parties who are not the Responsible Supplier

2.1. Party Return of CH

8. A Party in Possession (PiP) shall return to the DCC, all CHs which has been removed from premises and which they are in possession of, but for which they are not the Responsible Party (RP) by following this section. A PiP is required to return all CH for which they are not the RP as soon as reasonably practicable following its identification.
9. The following references to CH in this section refer to CH that have been removed from premises and which are in the possession of a Party that is not the Responsible Party (i.e. the PiP).
10. Where a PiP intends to return a CH they shall notify the DCC via the Service Desk.
11. Following such notification the PiP shall request a Returns Material Authorisation (RMA) via the Service Desk as per SEC Appendix I Clause 10.6 (b), such a request will be made via the Service Desk.
12. Following acceptance of an RMA request, the DCC shall:
 - a) confirm authorisation to the submitting Party using the contact details provided;
 - b) provide the Party with the following information via notification to the contact details provided:
 - i. a unique booking reference;
 - ii. confirmed timeslot for delivery;
 - iii. RMA reference; and
 - iv. any changes to the DCC contact details for the purposes of the return; and
 - c) request any additional information as may be reasonably required to facilitate the logistics of the return in accordance with Good Industry Practice.
13. SEC Appendix I Clauses 10.8 through to 10.20 shall apply to returning the CHs, where SR 8.14.3 or 8.14.4 does not need to be submitted.
14. SEC Appendix I Clause 10.11 shall not apply, unless the SR 8.14.3 or 8.14.4 has been submitted.

2.2. DCC process of returned CHs

15. Where a CHs is returned to the DCC by a PiP the following will apply.
16. The DCC shall confirm to the PiP, the CHF Identifier for the CH returned to the DCC.
17. SEC returns timescales for DCC processing returned CH will not apply when those CHs have been returned by a PiP.
18. On receipt of each CH, an unsolicited returns record shall be generated by the DCC, linked to the Responsible Party, for the CH on the Deemed Removal Date.
19. The DCC shall triage each CH to assess for damage and where a damaged CH will be processed in line with standard procedures where damage is identified.
20. For undamaged CH:

- a) The DCC shall set the CH state to decommissioned (where the CH is in a commissioned state) and unlock the CH; and
- b) The DCC shall undertake CH Fault Diagnoses for each CH and where fault is found determine whether the fault is Supplier or the DCC responsibility. Reporting on fault reasons shall not be included in standard return reporting.

21. Where CH are not faulty, the DCC shall take all reasonable steps to redeploy the CH.

2.3. Determining the Apportioning of CH Charges

- 22. The DCC will, for each returned CH, establish the date on which a second CH was installed at the same MPxN. This date shall be Deemed Removal Date.
- 23. The DCC will establish which Party was the Responsible Party at Deemed Removal Date for each CH to establish the Responsible Party at Removal.
- 24. Any charges applied in respect of the CH from the Deemed Removal Data which were charged to a Party other than the Responsible Party at Removal, will be credited to such other Party, and charged instead to the Responsible Party at Removal.
- 25. Any additional CH returned or damaged, costs will also be applied to the Responsible Party at Removal.
- 26. However, where CH replacement data is not available, or where the data or scenario of the installation (e.g. gas first installation) does not allow for a reasonable assessment of the returned CH removal date or responsibility, then charges will be applied to the Responsible Party as recorded at the time of return.

3. Definitions

Term	Definition
Party in Possession	means, in respect of a SMETS2+ Communications Hub which has been removed from a premises, the Party which has physical possession of that Communications Hub but who is not recorded as the Responsible Party.
Responsible Party	The Party responsible for the Smart ESME and CH.
Responsible Party at Removal	means the Party which was the Responsible Supplier for the CH on the Deemed Removal Date.
Deemed Removal Date	means, for each returned CH, the date on which a replacement CH was installed for the same MPxN.

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MP252 ‘Amending the process for Communications Hub returns’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP252 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	See Q10	-
E.ON	Large Supplier	Yes	E.ON's preferred solution is option A. Though both options will work, option A is the cleaner approach with less ongoing costs and complexity for E.ON. Option B will cause the handling of assets multiple times and ongoing storage/logistics costs, this is due to assets needing to be held in separate boxes and locations awaiting decommissioning before they can be processed and returned.
Octopus Energy	Large Supplier	Yes	The solutions proposed both allow any party to return CHF's to the DCC. This allows for an easier returns process and will reduce the volume of CHF's which remain in warehouses unable to be processed.

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

Question 2			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	See Q10	-
E.ON	Large Supplier	No	Timescales to implement appear significant, E.ON believes these need to be shortened to realise the benefits at a much faster pace and could conceivably support the transition from 2g-4g comms hubs.
Octopus Energy	Large Supplier	Yes	Either Options would appropriately handle issues outlined. It appears that Option A is more expensive but less reliant on DCC user input, where Option B carries a lower cost but more input from DCC users.

Question 3: Will there be any impact on your organisation to implement MP252?

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	A small amount of additional resource will be required to support the new process on an ongoing basis. Our view is option A is the simplest solution, this option is only a slight change to our current process. Going with this option will reduce disruption and the amount of on-going additional resource required when compared to option B.
Octopus Energy	Large Supplier	Minimal	We believe this is more of an issue for MOP's rather than suppliers. There is the potential that this activity will improve the data quality around removed CHF's which stands to bring benefits to all DCC users.

Question 4: Will your organisation incur any costs in implementing MP252?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Less than £100k	Assuming no system changes our side, and the new process is run in parallel to the existing process we do not foresee any development costs. The costs that will be incurred are FTE with E.ON needing staff to carry out the activity, we believe option B will have greater ongoing costs compared to option A. If option A is implemented, we see a very slight increase in activity that could be absorbed by our current workforce. If option B is implemented, we estimate the impact to be about ½ an FTE and an additional £60 per month in logistics fees. This estimate is with current return volumes, with 4g hubs around the corner and 2g/3g sunsetting we expect this will increase in the future.
Octopus Energy	Large Supplier	Yes	Solution Option A will have minimal incurred costs as the burden to sort and decommission the devices is on DSP which means

Question 5: How long from the point of approval would your organisation need to implement MP252?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	0-1 week	Assuming this is only a change to process and no internal system development is required, the time to implement for E.ON would be: Option A – Within a day, as there is only a slight change to our existing process we could set this up almost immediately. Option B – 1 week, we would need to implement changes with our logistics partner and changes to internal processes.
Octopus Energy	Large Supplier	Minimal time	The time to implement would vary depending on Option A or Option B however we feel confident that given the proposed timelines any changes could be made in advance of the given dates.

Question 6: Do you believe that MP252 would better facilitate the General SEC Objectives?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	We feel this change will feed into the SEC Objective to facilitate the efficient provision, along with the SEC Objective to facilitate the efficient and transparent administration and implementation of this Code.
Octopus Energy	Large Supplier	Yes	This proposal supports various SEC objectives: (A) the efficient operation and interoperability of smart metering systems, (D) by enabling effective competition between parties and (G) making the implementation of the code more efficient.

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP252 is implemented?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	Yes	Once an efficient process is established this could lead to less costs incurred across the industry, potentially leading to lower operational costs and lower costs passed through to the consumer.
Octopus Energy	Large Supplier	Yes	There is a cost associated with either Solution option A or B which will ultimately be borne by customers. There is a potential for SECMP252 to bring improvements in the smart meter data quality around CHFs which if acted upon by DCC users offers improvements to customer experience.

Question 8: Noting the costs and benefits of this modification, do you believe MP252 should be approved?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	-	-
E.ON	Large Supplier	E.ON agree in principle however more details around costing are required before a formal decision can be made.	We believe this will be off benefit to us and the industry, solving a known issue and should lead to an improved process with a reduction in operational costs. It is difficult to quantify the full benefit as insufficient detail around DCC costing has been provided, this impacts the benefits analysis. DCC needs to be providing its full cost range as soon as possible including estimates for SIT, UIT, implementation and support costs.
Octopus Energy	Large Supplier	Yes	This will allow for the return of CHF's where the responsible supplier cannot be identified. This will improve data integrity with returned CHF's being more easily decommissioned or marked as returned; it will also reduce storage necessity for these Hubs which currently have no known returns journey due to inability to identify responsible supplier.

Question 9: Noting the draft DCC Alternative Returns for Communications Hubs Guidance document in Annex C, do you agree with how the DCC plans to determine a removal date of each of the Communications Hubs, and correct charges retrospectively?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
E.ON	Large Supplier	More information required	The potential period between "Deemed Removal Date" and the date the CH is returned to the DCC could in many cases be an inaccurate or inappropriate measure. This time difference could be lengthy, especially where the customer prevents or delays access to site. If the loss of communications is due to a Comms Hub fault or WAN coverage issue under the control of the DCC or its service providers, it's unclear why the "Responsible Party at Removal" should be receiving the re-allocated or the additional costs. We would like to understand what if any other alternative options have been considered and are available for review.	More details of how the "Deemed Removal Date" and allocation of costs will be provided by the DCC as part of the DCC Impact Assessment. In addition, the DCC Alternative Returns for Communications Hubs Guidance document will also be updated to provide more clarity to SEC Parties.
Octopus Energy	Large Supplier	Yes	We agree with the proposal to use the last communicated date as the Deemed Removal Date. The proposed mechanism seems fair to ensure the responsible party at point of removal is charged for this.	-

Question 10: Please provide any further comments you may have.

Question 10			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	We are confused by some of the detail on this modification, but have the following comments: The cost of Option A (especially the reference to extensive regression testing and integration testing in addition to the £860k - £1m cost estimate) is worrying, and so is the longer delivery time, especially as this takes the modification past November 2025, which leads to greater uncertainty around DSP re-procurement. On this basis, we would prefer Option B. We also note that in the September 2024 working group, it was said that the Option A £860k - £1m cost was still being finalised, and was <i>likely to increase further</i>. Is this likely further increase linked just to 4G, or are there other reasons behind this expected increase? The DCC has estimated that 65,000 CHs are currently not on the wall, but not with the Responsible Supplier. Does the DCC have details on how these 65,000 are split by Responsible Supplier. (For example, we know how many such assets we have in our possession, where we are not the Responsible Supplier, but we don't know how many are held incorrectly by others, where we <i>are</i> the Responsible Supplier.) Whilst we realise the GDPR constraints prevent the DCC from sharing details on individual meters, we are not clear why it is not possible for the holding party to advertise details of the meters, for the	For the increased costs above what was quoted in the Preliminary Assessment for Option A, the DCC noted it was not only the 4G addition which would increase it. They had other factors but did not disclose what they were nor provide SECAS with an updated cost range as yet. The DCC is unable to reveal to the party in possession of, who the Responsible Supplier is for the Communication Hubs they hold, due to confidentiality clauses in SEC Section M 'General'. As for advertising the Communication Hubs details, the DCC noted they have tried to contact Responsible Suppliers for Communication Hubs not in their possession, but were told by the Responsible Suppliers they would not do anything unless they physically had possession of the Communication Hub. Therefore, if the DCC advised the party in possession where to send the Communication Hubs, they would be in breach of the confidentiality clauses in SEC

Question 10			
Respondent	Category	Comments	SECAS Response
		Responsible Supplier(s) to then recognise their assets. Can you explain why an advertising solution isn't possible?	Section M 'General'. Also to note the increased carbon footprint by sending these Communication Hubs between Parties.
E.ON	Large Supplier	In the modification documents there is no mention of the return SR's - 8.14.3 / 8.14.4. Would there still be a requirement for these SR's to be sent prior to return?	The DCC noted in Solution Options A and C, that there will be the need for SEC Parties to send SRVs 8.14.4 and 8.14.4 where possible. For CHs where the Party in Possession is not the Responsible Supplier, therefore unable to send the SRVs, the SEC Party is to include the CHs into the returning pallet, so DCC/CSPs processed them upon physical receipt of the CHs.
Octopus Energy	Large Supplier	The timelines and costs associated with the two options proposed seem to lead respondents to opt for Option B as it is suggested to be significantly cheaper and faster to implement. There is discussion about the charging mechanism as part of this MP and how the charges should be levied. We have raised previously that the current charging mechanism is not clear on how charges are levied to DCC users. The monthly invoices and charging mechanism are not clear meaning it is not obvious where the savings will always be made in such proposals. We do not believe this should prevent the approval of MP252 but wish to mention this.	More details of charges levied will be provided by the DCC as part of the DCC Impact Assessment. In addition, the DCC Alternative Returns for Communications Hubs Guidance document will also be updated to provide more clarity to SEC Parties.

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SECMP0252
Estimate of Full End to End Costs
(inc SEC Release regression testing)

Version: 0.21

Date: 23/12/2024

Author: Robbie McMillan

SECMP0252 Supporting Test Costs Overview

The table below details the estimate of testing costs that might be incurred if this SEC Modification was to be deployed via a SEC Release but in isolation. Other Modifications or Change Requests in a SEC Release might well split the costs across multiple changes, possibly with minimal increases to overall testing costs.

The functional testing is described, and costs broken out, in the Full Impact Assessment (FIA). The FIA description includes the number of test sets, and anticipated number of tests required to fully test the functional change introduced by the Modification.

Regression testing covers additional testing and administrative overhead to ensure that the DCC Total System is fully functioning. System Integration Testing (SIT) costs are initially established by the Service Providers for the DCC Total System, but are refined as part of the Release Change Request and Implementation phase, for which the former is also referred to as the post-PIT Change Request.

User Integration Testing (UIT) as part of the Regression testing refers to the testing period which is made available for SEC parties to test their systems against the future state of the DCC Total System.

Given the changes in this Modification, there is a limited amount of functional testing that should be carried out. In addition, the limited changes to DUIS means there is a requirement for Users to test this separately in the UIT environment, and Users wishing to use the functionality must upgrade to this version of DUIS. DCC have included six weeks of user-based UIT testing, although could be reduced. Costs for this are included in the costs for this Modification, and those costs will be calculated as part of the post-PIT CR.

The figures have been estimated based on previous SEC Releases, where a diverse environment supporting multiple GBCS versions was open for up to six weeks which must be supported by Service Providers. Part of those costs are for setup and teardown activities, as well as being available for support during this time.

if there is more than one release candidate change including DUIS charges, only one set of charges will be payable, since the DUIS changes required for the individual change will be carried out once only for the release. Such a sharing of costs will result in a reduction of charges for the DUIS components of this Modification in a SEC Release.

All the testing activities and estimates will be reviewed as part of post approval implementation activities, which as suggested above, will be impacted by additional Modifications or Change Requests in that SEC Release.

The table also presents two options that shows value for money choice, based on scope and risk appetite.

Description	Cost
FUNCTIONAL	
Design, Build, PIT, functional testing in SIT and UIT, Path to Live	£329,626
REGRESSION	
Option 1 and 2: 6 weeks SIT regression testing including CSP support	£169,800
UIT Option: 6 weeks UIT Testing costs (as per policy document)	£480,000
Total (Option 1)	£ 979,426

Costs are estimated ONLY and will likely change if scope within a target SEC System Release window, changes.

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MP252 ‘Amending the process for Communications Hub returns’

Annex F

Legal text – version 1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section A ‘Definitions and Interpretations’

These changes have been redlined against Section A version 44.0.

Add the following definitions to Section A1.1 in alphabetical order as follows:

A DEFINITIONS AND INTERPRETATION

A1. DEFINITIONS

A1.1 In this Code, except where the context otherwise requires, the expressions in the left hand column below shall have the meanings given to them in the right hand column below:

Alternative Returns for Communications Hubs Document

means the document of that name established and maintained by the DCC under SEC Section F8.9A (Alternative Returns for Communications Hubs Document).

Communications Hub Update Bulk file (or CHUB file)

means a file containing a list of Communication Hub GUIDs a Party is requesting to return to the DCC.

Section F 'Smart Metering System Requirements'

These changes have been redlined against Section F version 23.0.

Amend Section 8 as follows:

F8. REMOVAL AND RETURN OF SMETS2+ COMMUNICATIONS HUBS

All references to "Communications Hubs" in this Section F8 are references to "SMETS2+ Communications Hubs".

Product Recall / Technology Refresh

F8.1 The DCC's rights under this Section F8.1 are in addition to (and separate from) the rights of the DCC (and the obligations of the other Parties) to remove and/or return Communications Hubs under other provisions of this Code (including pursuant to the Incident Management Policy and the CH Support Materials). The DCC has the right to request (in reliance on this Section F8.1) that Parties return to the DCC one or more Communications Hubs. Following receipt of such a request:

- (a) in respect of Communications Hubs that have been delivered but have not yet been installed at premises, the Party which ordered those Communications Hubs shall return them to the DCC (or, if there has been a Communications Hub Transfer, the Party which obtained the Communications Hub under the Communications Hub Transfer);
- (b) in respect of Communications Hubs that have been installed at premises and not yet removed from that premises, the Lead Supplier for those Communications Hubs shall remove them from the premises and return them to the DCC (and this obligation shall apply whether or not such Lead Supplier is a User); and
- (c) in respect of Communications Hubs that have been removed from a premises and not yet returned to the DCC, the Supplier Party that removed the Communications Hub from the premises shall return them to the DCC.

F8.2 Where Section F8.1 applies, the DCC shall provide to Supplier Parties all such information as they or their Energy Consumers reasonably require in respect of the situation. Those Supplier Parties to whom Section F8.1(b) applies shall issue to affected Energy Consumers such information as is provided by the DCC concerning the situation.

Removal of Communications Hubs

F8.3 Each Supplier Party that:

- (a) is a Responsible Supplier for the Communications Hub Function forming part of a Communications Hub, is entitled to remove that Communications Hub from the premises at which it is installed (but must install a replacement Communications Hub);
- (b) Decommissions a Communications Hub Function, shall remove the Communications Hub of which the Communications Hub Function forms part from the premises at which it is installed; and

- (c) is a Responsible Supplier for the Communications Hub Function forming part of a Communications Hub, may also be obliged under another provision of this Code to remove a Communications Hub, including where it is obliged to do so in accordance with the Incident Management Policy or the CH Support Materials.
- F8.4 Where a Supplier Party removes a Communications Hub from a premises, it shall do so in accordance with the CH Installation and Maintenance Support Materials.
- F8.5 Where a Communications Hub is removed by a Supplier Party from a premises at which it was previously installed, then the risk of loss or destruction of or damage to that Communications Hub shall vest in that Supplier Party as set out in Section F7.4(a) (Risk in the Communications Hubs following Installation).

Return of Communications Hubs

- F8.6 Where a Communications Hub is removed by a Supplier Party from a premises at which it was previously installed, the Supplier Party shall return the Communications Hub to the DCC within 90 days after the date of its removal. This obligation to return a Communications Hub only applies where the Communications Hub Function which forms part of that Communications Hub has at any time had an SMI Status of 'installed not commissioned' or 'commissioned'.
- F8.7 A Party that wishes to return a Communications Hub to the DCC shall be entitled to do so at any time. A Party that ceases to be a Party shall return to the DCC all the Communications Hubs that have been delivered to that Party and not yet: (a) transferred under a Communications Hub Transfer; (b) installed at premises; or (c) reported as lost or destroyed.
- F8.8 The DCC shall publish on the CH Ordering System the following information:
 - (a) the addresses of no more than two locations in respect of each Region to which Communications Hubs can be returned (which locations must be in Great Britain), making clear which Device Models may be returned to which locations;
 - (b) the operating hours of each such location during which returns can be made (which operating hours must be reasonable); and
 - (c) any changes to the information required to be published under (a) and (b) above, for which at least four months' advance notice must be given (unless the Panel approves a shorter period).
- F8.9 A Party required or opting to return one or more Communications Hubs to the DCC shall:
 - (a) notify the DCC of the number of Communications Hubs to be returned, of the location to which they are to be returned (being one of the locations published for the relevant Region in accordance with Section F8.8), of the date on which they are to be returned, and of any further information required in accordance with the CH Installation and Maintenance Support Materials;
 - (b) return those Communications Hubs to the location and on the date notified in accordance with (a) above during the applicable operating hours for that location published in accordance with Section F8.8;
 - (c) otherwise comply with the return requirements set out in the CH Installation and Maintenance Support Materials; and

- (d) be liable to pay the applicable Charges in the event that it returns one or more Communications Hubs to the wrong returns location.

Alternative Return of Communications Hubs Document

F8.9A The DCC shall develop and maintain a Code Required Document (to be known as the 'Alternative Returns for Communications Hubs Document') which sets out the rights and obligations of the DCC and Parties in relation to the return of a CH where the Party is not the Responsible Supplier.

F8.9B The initial version of the Alternative Returns for Communications Hubs Document shall be the version approved as part of the Modification Proposal via which Section F8.9A was added to this Code. The DCC shall only make changes to this document where it has:

- (a) undertaken reasonable consultation with the other Parties regarding proposed changes;
- (b) given due consideration to, and taken into account, any consultation responses received; and
- (c) received approval from the Panel to make such changes.

F8.9C Following Panel approval of any changes, the DCC shall publish an updated copy of Alternative Returns for Communications Hubs Document on the DCC Website.

Acceptance of Returned Communications Hubs

- F8.10 The Party assigned responsibility for doing so under the CH Handover Support Materials shall ensure that the returned Communications Hubs are unloaded from the vehicle in which they have been returned, and that they are unloaded in accordance with Good Industry Practice and the CH Installation and Maintenance Support Materials.
- F8.11 Risk of loss or destruction of or damage to returned Communications Hubs shall transfer to the DCC on commencement of such unloading (where unloaded by the DCC) or on completion of such unloading (where not unloaded by the DCC).

Access to Returns Locations

- F8.12 The DCC shall ensure that each Party (and its sub-contractors and its and their agents) is allowed access to the locations published pursuant to Section F8.8 for the purposes of exercising the Party's rights and performing the Party's obligations under this Section F8.
- F8.13 The relevant Party shall ensure that any person that accesses a location pursuant to Section F8.14 shall do so in compliance with Good Industry Practice and the site rules and reasonable instructions of the DCC (or its representatives).

Reconditioning or Disposal of Communications Hubs by the DCC

- F8.14 The DCC shall take all reasonable steps to recondition and redeploy each Communications Hub that is returned to the DCC (having regard to the requirements of the DCC Licence).
- F8.15 Before a Communications Hub that has been returned to the DCC is delivered to a Party pursuant to Section F6 (Delivery and Acceptance of Communications Hubs), the DCC shall ensure that all Data relating to one or more Energy Consumers is permanently erased from that

Communications Hub in accordance with the standard referred to in Section G2.18 (Management of Data).

- F8.16 Unless the Communications Hub is reconditioned and redeployed in accordance with Sections F8.14 and F8.15, the DCC shall ensure that each Communications Hubs that has been returned to the DCC is disposed of in accordance with Good Industry Practice and the standard referred to in Section G2.18 (Management of Data).

Loss or Destruction of Communications Hubs

- F8.17 Where a Communications Hub has been lost or destroyed (save where such loss or destruction occurs while the risk of loss or destruction was the responsibility of the DCC), the following Party shall notify the DCC of such loss or destruction (via the CH Ordering System):
- (a) where such loss or destruction occurs prior to completion of the Communications Hub's installation at a premises by a Supplier Party, the Party that ordered that Communications Hub (or, in the case of Special Installation Mesh Communications Hubs, the Supplier Party which took delivery of the Communications Hub);
 - (b) where such loss or destruction occurs after completion of such installation and before commencement of the Communications Hub's removal from a premises by a Supplier Party, the Supplier Party responsible under the Incident Management Policy for resolving the relevant Incident; or
 - (c) where such loss or destruction occurs after commencement of the Communications Hub's removal from a premises by a Supplier Party, the Supplier Party which undertook such removal.
- F8.18 Where a Communications Hub is lost or destroyed following completion of its installation at a premises by a Supplier Party and before commencement of its removal from a premises by a Supplier Party, then the Supplier Party that is obliged to notify the DCC of such loss or destruction under Section F8.17(b) shall be deemed to bear the risk of such loss or destruction as described in Section F7.4(b) (Risk in the Communications Hubs following Installation Installation).

Appendix I 'CH Installation and Maintenance Support Materials'

These changes have been redlined against Appendix I version 6.0.

Amend Clause 10 as follows:

10. COMMUNICATIONS HUB RETURNS

- 10.1 Where a Supplier Party has handed back a Special Installation Mesh Communications Hub to the DCC whilst in attendance at the relevant premises and where the Special Installation Mesh Communications Hub had been installed at a previous installation visit, the Party shall submit Service Request 8.14.3 (Communications Hub Status Update – Fault Return) or Service Request 8.14.4 (Communications Hub Status Update – No Fault Return) in respect of the Communications Hub returned in accordance with DUIS within three (3) Working Days.
- 10.2 In all circumstances other than those specified in clause 10.1, including where a Party wishes to return a Special Installation Mesh Communications Hub or T3 Aerial Type and/or M1 / M2 Aerial Types when the DCC is not in attendance at the relevant premises in accordance with Section 6 of this document, the Party shall follow the procedure in clauses 10.3 - 10.20 of this document to return the Special Installation Mesh Communications Hub, and return the T3 Aerial Type and/or M1 / M2 Aerial Types within this process.
- 10.3 Following the acceptance of Communications Hubs, where a Party wishes to return Communications Hubs to the DCC, that Party shall do so in accordance with the procedures set out in clauses 10.1 to 10.20 of this document. If a Party is not eligible to send Service Request 8.14.3 or 8.14.4 in respect of a Communications Hub, then the Alternative Returns for Communications Hubs Document in SEC Section F8.9A will also apply.
- 10.4 The DCC shall make available to all OMS account profiles, the following information for any DCC Returns Location:
 - (a) the full delivery address;
 - (b) operating hours; and
 - (c) the name, email address, and telephone number for a nominated contact in relation to Communications Hub returns.

Return Materials Authorisation

- 10.5 To return a Cellular Communications Hub a Party shall request a Returns Material Authorisation (RMA) once that Party has notified the DCC by either having:
 - (a) submitted Service Request 8.14.3 or Service Request 8.14.4 in respect of the Cellular Communications Hub to be returned; or
 - (b) contacted the Service Desk.
- 10.6 The requesting Party shall ensure that the request for an RMA is:

- (a) made via the CH Ordering System; and
- (b) includes:
 - (i) the CHF Identifier for each Communications Hub to be returned under that RMA, as previously notified to the DCC in accordance with clause 10.5
 - (ii) the contact name, email address, and telephone number to be used by the DCC to contact the Party in relation to that RMA;
 - (iii) the preferred DCC Returns Location; and
 - (iv) a preferred Return Date, which shall be on a Working Day at least five (5) Working Days following the date that the request for the RMA is submitted.

10.7 Following acceptance of an RMA request, the DCC shall:

- (a) confirm authorisation to the submitting Party using the contact details provided;
- (b) provide the Party with the following information via the Order Management System using either the 'CH Ordering' or 'CH Delivery and Returns' OMS profiles or via notification to the contact details provided:
 - (i) a unique booking reference;
 - (ii) confirmed timeslot for delivery;
 - (iii) RMA reference; and
 - (iv) any changes to the DCC contact details for the purposes of the return; and
- (c) request any additional information as may be reasonably required to facilitate the logistics of the return in accordance with good industry practice.

Returns Equipment and Packaging

- 10.8 A Party shall ensure that all Communications Hubs returned to the DCC are in packaging of equivalent standard to that in which a Communications Hub of that Device Model was originally packaged, not exceeding the maximum number of Communications Hubs per carton and cartons per pallet set out in the CH Handover Support Materials.
- 10.9 A Party may return aerials or other equipment to DCC within a Communications Hub return delivery and must ensure that any aerials or other equipment returned to the DCC are in packaging of equivalent standard to that in which the aerials or other equipment was originally packaged.
- 10.10 Where a Communications Hub has been subject to environmental or biological contamination, the Party shall:
 - (a) where it is safe to do so, place the Communications Hub in appropriately sealed packaging such that DCC can clearly identify the nature of the contamination without removing or unsealing such packaging; or

- (b) where safe return of a contaminated Communications Hub is not possible, safely and securely dispose of the Communications Hub.

Delivery of Returns

- 10.11 Where the Party does not return a Communications Hub within 90 days pursuant to Section F8.6 of the Code, the Communications Hub shall be deemed to be lost or stolen and the DCC shall prevent that Communications Hub from connecting to the SM WAN.
- 10.12 The Party shall ensure that the Communications Hub delivery is accompanied with a Return Delivery Note that contains, as a minimum, the following information:
 - (a) booking reference for the return delivery as supplied by DCC pursuant to clause 10.7;
 - (b) return date and return delivery time;
 - (c) Party Signifier;
 - (d) DCC Returns Location;
 - (e) list of all CHF Identifiers being returned; and
 - (f) (where one or more pallets are to be returned), the pallet identifiers for each pallet being returned.
- 10.13 The DCC shall provide the Party with a printable RMA label for each return delivery via the OMS (using the CH Ordering or CH Delivery and Returns profile) immediately following authorisation. The Party shall securely attach the corresponding RMA label on each pallet and each carton (where a carton is not part of a pallet) and each Communications Hub (where a Communications Hub is not part of a pallet or carton) for each return delivery.
- 10.14 The Party shall notify the DCC if there are any known issues that mean the delivery will be late, stating the reason for the delay and the expected time of arrival. The Party shall take all reasonable steps to make such notification a minimum of 5 Working Hours prior to the return delivery booking time. The DCC shall take all reasonable steps to accommodate a revised return delivery booking time and shall confirm to the Party that the DCC is either:
 - (a) able to accept the late return delivery; or
 - (b) unable to accept the return delivery.
- 10.15 Where the DCC is unable to accept the return delivery the DCC shall notify the returning Party as soon as reasonably practicable and shall notify the Party of the full range of available delivery dates and times within the following 90 days and the Party shall notify the DCC of an acceptable revised date and clauses 10.13 and 10.14 shall apply in relation to the revised date.

Delivery Acceptance

- 10.16 Prior to signing the Return Delivery Note, the DCC may carry out the following:
 - (a) assessment of pallets delivered against those recorded under the RMA request;
 - (b) checks between CHF Identifiers received against those listed under the RMA request; and

- (c) checks that the number of Communications Hubs returned match the number of CHF Identifiers listed in the RMA request.
- 10.17 The DCC may reject any returned Communications Hubs where unloading them would present a health and safety risk. Where the DCC rejects the return delivery, the Party shall be required to request a new RMA and rearrange the return delivery following the relevant procedures set out in clauses 10.5 to 10.15 of this document.
- 10.18 Following the checks performed pursuant to clause 10.16, the DCC shall record any discrepancies between the return delivery and the Return Delivery Note.
- 10.19 Where requested to do so the DCC shall sign and retain a copy of the Return Delivery Note.
- 10.20 Where the Party fails to provide the DCC with a fault reason for each CHF Identifier in accordance with the requirements set out in this document, the Communications Hub shall be deemed to be a return pursuant to Section F9.5 (e) of the Code and the Communications Hub Fault shall be a CH User Responsibility in accordance with Section F9.6 (a) of the Code.

Appendix Q 'IKI Certificate Policy'

These changes have been redlined against Appendix Q version 8.0.

Amend Part 1.4.1 of the Policy as follows:

1.4 USAGE OF IKI CERTIFICATES AND ICA CERTIFICATES

1.4.1 Appropriate Certificate Uses

(A) The ICA shall ensure that IKI Certificates are Issued only:

- (i) to Eligible Subscribers; and
- (ii) for the purposes of either authenticating the Subject to the SMKI Services or signing files related to Threshold Anomaly Detection, the Certified Products List, ~~and~~ the SMKI Recovery Procedure ~~and~~ CHUB files that are sent to the DCC.

(B) The ICA shall ensure that ICA Certificates are Issued only to the ICA:

- (i) in its capacity as, and for the purposes of, exercising the functions of, the Root ICA; and
- (ii) in its capacity as, and for the purposes of, exercising the functions of, an Issuing ICA.

(C) Further provision in relation to the use of Certificates is made in Section L11 (Subscriber Obligations) and Section L12 (Relying Party Obligations) of the Code.

Amend Annex A of the Policy in alphabetical order as follows:

Annex A: Definitions and Interpretation

In this Policy, except where the context otherwise requires -

- expressions defined in Section A of the Code (Definitions and Interpretation) have the same meaning as is set out in that Section,
- the expressions in the left hand column below shall have the meanings given to them in the right hand column below,
- where any expression is defined in Section A of the Code (Definitions and Interpretation) and in this Annex, the definition in this Annex shall take precedence for the purposes of the Policy.

**Communications Hub
Update Bulk file (or
CHUB file)**

means a file containing a list of Communication Hub GUIDs a
Party is requesting to return to the DCC.

Appendix AD ‘DCC User Interface Specification’

These changes have been redlined against Appendix AD version 5.3.

Amend Section 3.8.120 as follows:

3 MESSAGES SENT OVER THE INTERFACE

3.8 Service Request Definitions

3.8.120 Communications Hub Status Update – Fault Return

3.8.120.1 Service Description

Service Request Name	CommsHubStatusUpdate-FaultReturn	
Service Reference	8.14	
Service Reference Variant	8.14.3	
Eligible Users	Import Supplier (IS) Gas Supplier (GS) Registered Supplier Agent (RSA)	
Security Classification	Non Critical	
BusinessTargetID - Device Type applicable to this request	DCC Access Control Broker	
Can be future dated?	No	
On Demand?	No	
Capable of being DCC Scheduled?	No	
Command Variants applicable to this Request (Only one populated)	8 – DCC Only	
Common Header Data Items	See clause 3.4.1.1	
Data Items Specific to this Service Request	See Specific Data Items Below	
Possible responses from this Service Request	These are the possible responses applicable to this Service Request. Please see clause 3.5 for more details on processing patterns • Acknowledgement Also see Response Section below for details specific to this request	
Response Codes possible from this Service Request	See clause 3.5.10 for Common Response Codes	
GBCS Cross Reference	Electricity	Gas
GBCS MessageCode	N/A	N/A

GBCS Use Case	N/A	N/A
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3.8.120.2 Specific Data Items for this Request

CHFFaultReturn Definition

Data Item	Description / Values	Type	Mandatory	Default	Units
DeviceID	The device ID of the Communications Hub Returned (CHF)	sr:EUI (See clause 3.10.1.3)	Yes	None	N/A
CHFFaultReturnType	Valid set: - Fault identified prior to installation - Fault identified post installation	sr:CHFFaultReturnTy pe (Restriction of xs:string (Enumeration))	Yes	None	N/A
UserRefDateTime	An optional field to record User recorded time of activity or engineer job	xs:dateTime	No	None	UTC Date-Time
UserRefID	An optional field to record User reference for activity or engineer job	sr:UserRefID (Restriction of xs:string (maxLength = 25))	No	None	N/A
OtherDeviceID	The Device ID of the ESME/GSME associated with the CHF If there is no ESME or GSME associated with the CHF, OtherDeviceID should be populated with the CHF DeviceID	sr:EUI (See clause 3.10.1.3)	Yes	None	N/A
IncidentReference	An optional field to record a DCC Service Management associated incident reference	sr:IncidentReference (Restriction of xs:string (maxLength = 15))	No	None	N/A
CHFCConnectionMethod	To record how the Communications Hub has been installed and connected to the rest of the Smart Metering System within the consumer premise Valid set: - Hot-shoe - Cradle - ESME	sr:CHFCConnectionMet hod (Restriction of xs:string (Enumeration))	Yes	None	N/A

CHFFaultReason	User description of fault Valid set: - Damaged case - Damaged Connector - Illegal interference or missing seals - Environmental conditions exceeded - SM WAN Fault - SMHAN Interface Fault - LED Fault - Aerial Fault - Manufacturing defect	sr:CHFFaultReason (Restriction of xs:string (Enumeration))	Yes	None	N/A
AdditionalInformation	An optional field to record any specific User information of Communications Hub installation details or activity	Restriction of xs:string (maxLength = 200)	No	None	N/A

Table 1 : CHFFaultReturn (sr:CHFFaultReturn) data items

3.8.120.3 Specific Validation for this Request

See clause 3.2.5 for general validation applied to all Requests.

For this Request, the general Authorisation Checks as defined below shall not be carried out.

- a Response Code of E5 as defined in clause 3.2.4 “Verify that the Service Request or Signed Pre-Command is applicable to the Device status”

Where a User with a User Role of RSA submits the Service Request then a specific validation check will be carried out for Response Code E5 as described in the table below.

Response Code	Response Code Description
E5	The User Role is RSA and the CHF Device Status is not Pending
E081401	The Device Type of the Device being notified is not CHF
E081405	The user reference date & time supplied is a future date
<u>E081406</u>	<u>The CHF Device status is not ‘Decommissioned’, and the CHF has associated Devices which are still communicating</u>
W081401	The CHF Device status is not ‘Decommissioned’.

3.8.120.4 Additional DCC System Processing

Where the CHF Device status is not ‘Decommissioned’ and response code W081401 is returned, the DCC shall update the CHF Device status to ‘Decommissioned’. If the GPF Device status is also not ‘Decommissioned’ the DCC shall update the GPF Device status to ‘Decommissioned’.

Amend Section 3.8.121 as follows:

3 MESSAGES SENT OVER THE INTERFACE

3.8 Service Request Definitions

3.8.121 Communications Hub Status Update – No Fault Return.

3.8.121.1 Service Description

Service Request Name	CommsHubStatusUpdate-NoFaultReturn	
Service Reference	8.14	
Service Reference Variant	8.14.4	
Eligible Users	Import Supplier (IS) Gas Supplier (GS) Registered Supplier Agent (RSA)	
Security Classification	Non Critical	
BusinessTargetID - Device Type applicable to this request	DCC Access Control Broker	
Can be future dated?	No	
On Demand?	No	
Capable of being DCC Scheduled?	No	
Command Variants applicable to this Request (Only one populated)	8 – DCC Only	
Common Header Data Items	See clause 3.4.1.1	
Data Items Specific to this Service Request	See Specific Data Items Below	
Possible responses from this Service Request	These are the possible responses applicable to this Service Request. Please see clause 3.5 for more details on processing patterns • Acknowledgement Also see Response Section below for details specific to this request	
Response Codes possible from this Service Request	See clause 3.5.10 for Common Response Codes	
GBCS Cross Reference	Electricity	Gas
GBCS MessageCode	N/A	N/A
GBCS Use Case	N/A	N/A

3.8.121.2 Specific Data Items for this Request

CHFNoFaultReturn Definition

Data Item	Description / Values	Type	Mandatory	Default	Units
DeviceID	The Device ID of the Communications Hub Returned (CHF)	sr:EUI (See clause 3.10.1.3)	Yes	None	N/A
CHFNoFaultReturn Type	Valid set: - No Fault Return (general) - No Fault Return (non-dom opt out) - No Fault Return (dual supplier HAN variant replacement) - No Fault Return (SM WAN variant replacement requested by DCC) - Lost or Stolen Hub	sr:CHFNoFaultReturn Type (Restriction of xs:string (Enumeration))	Yes	None	N/A
UserRefDateTime	An optional field to record User recorded time of activity or engineer job	xs:dateTime	No	None	UTC Date-Time
UserRefID	An optional field to record User reference for activity or engineer job	sr:UserRefID (Restriction of xs:string (maxLength = 25))	No	None	N/A
IncidentReference	An optional field to record a DCC Service Management associated incident reference	sr:IncidentReference (Restriction of xs:string (maxLength = 15))	No	None	N/A
AdditionalInformation	An optional field to record any specific User information of Communications Hub installation details or activity	Restriction of xs:string (maxLength = 200)	No	None	N/A

Table 2 : CHFNoFaultReturn (sr:CHFNoFaultReturn) data items

3.8.121.3 Specific Validation for this Request

See clause 3.2.5 for general validation applied to all Requests.

For this Request, the general Authorisation Checks as defined below shall not be carried out.

- a Response Code of E5 as defined in clause 3.2.4 “Verify that the Service Request or Signed Pre-Command is applicable to the Device status”

Where a User with a User Role of RSA submits this Request then a specific validation check will be carried out for Response Code E5 as described in the table below.

Response Code	Response Code Description
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E5	The User Role is RSA and the CHF Device Status is not Pending
E081401	The Device Type of the Device being notified is not CHF
E081405	The User reference date & time supplied is a future date
<u>E081406</u>	<u>The CHF status is not 'Decommissioned', and the CHF has associated Devices which are still communicating</u>
W081401	The CHF Device status is not 'Decommissioned'.

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3.8.121.4 Additional DCC System Processing

Where the CHF Device status is not 'Decommissioned' and response code W081401 is returned, the DCC shall update the CHF Device status to 'Decommissioned'. If the GPF Device status is also not 'Decommissioned' the DCC shall update the GPF Device status to 'Decommissioned'.