

What stage is this document in the process?

01	Modification Proposal
02	Initial Modification Report
03	Draft Modification Report
04	Final Modification Report

Stage 01: Modification Proposal

SECMPO010:

Introduction of triage arrangements for Communication Hubs

SEC Supplier parties should be permitted to carry out basic 'triage' checks on Communications Hubs following their removal from a consumer's property.

The Proposer recommends that this Modification should be:



- progressed as a Path 2: Authority Determined Modification

This Modification Proposal should:

- be assessed by a Work Group



Medium Impact:
Suppliers, CSPs and the DCC

MODIFICATION PROPOSAL FORM V1.0

1. Proposer's Contact Details

Details of Proposer

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Representative as Point of Contact

Details of Representative's Alternate

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2. Modification Proposal Details

Mod Submission Date:	2 nd March 2016
Title of Mod Proposal:	Introduction of triage arrangements for Communication Hubs
Description in Detail of the Proposed Modification:	Currently Suppliers perform testing activities upon the return of a Communications Hub asset. Asset return may be due to its removal from site or due to a 'fault on fit' issue occurring during installation. This activity remains essential following the commencement of the mass rollout post DCC Go-Live in 2016. However, the absence of a clear view on how this will be possible within the SEC arrangements and DCC systems risks making it difficult for Suppliers to perform quality assurance and diagnostic activities and identify failure reasons for assets when they have been removed from service or returned as faulty.

SEC Supplier parties should be permitted to carry out basic checks or 'triage' on Communications Hubs following their return from a consumer's property. Currently the SEC arrangements do not allow Suppliers to undertake such activity. This would result in all removed Communications Hubs being assumed to be no longer fit for purpose or re-use. The introduction of a 'triage' and recycling solution will mitigate against large costs associated with the return of good hubs to the DCC and reduce the overall costs of GB smart rollout.

DECC recently commented in their document entitled 'December 2015 Government Response to previous consultations on: Stage 4 Smart Energy Code (SEC) (June 2014), March 2015 SEC Consultation and July 2015 SEC Consultation': *'We have not made provision for the proposed checking of Communications Hubs as a Communications Hub that was operating correctly when it was removed could reasonably be expected to work in future, but if Parties consider it a valuable capability that they could consider proposing a modification under the enduring SEC modification process at an appropriate point in time.'*

This proposal seeks to address this issue and, in addition, the checking of Communication Hubs which display a fault during commissioning.

Introducing arrangements which provide Suppliers with the ability to undertake Communication Hubs 'triage' would increase the chances of their re-use, reduce overall programme costs and reduce environmental impacts associated with unnecessary disposal. Benefits will extend to suppliers, the DCC, MAPs and other industry parties.

Checks introduced by these arrangements could include determining whether the Communications Hub is capable of establishing a SM WAN connection, which is not currently possible under the existing drafting of the Communication Hub Installation & Maintenance Support Materials (CHIMSM). This prevents DCC Users from allowing a Communications Hub to connect to the SM WAN prior to its installation for the purposes of commissioning the device.

A working group should be convened to discuss this proposal and assess the detailed requirements needed to develop the new arrangements.

3. Path Type and Urgency Recommendation

Proposer's recommendations on Path Type (delete as appropriate)

Path 1 / Path 2 / Path 3

Statement for recommended Path Type:

The proposal will introduce new arrangements into the SEC and place obligations on parties who wish to undertake activities relating to the triage of Communication Hubs off circuit. Therefore the proposal is not suitable for Self Governance (Path 3) and will require Authority Determination.

Statement of whether Proposal is intended to be Fast-Track Modification (only Panel may raise this type of modification):

The proposal is not intended to be a Fast-Track modification.

Is the Proposal Urgent? (delete as appropriate)

Yes / No

Statement of whether Proposal should be treated as an Urgent Proposal:

Not applicable.

4. Modification Impact Assessment

4.1 SEC Objectives

Facilitation of SEC Objectives	Tick
General SEC Objectives (C1.1)	
(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain;	☒
(b) the second General SEC Objective is to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence;	☒
(c) the third General SEC Objective is to facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems;	☐
(d) the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy;	☐
(e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy;	☐
(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code;	☐
(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.	☐
Transition Objective (X1.2)	
X1.2 The objective to be achieved pursuant to Section X: Transition is the efficient, economical, co-ordinated, timely, and secure process of transition to the Completion of Implementation.	☐
Charging Objectives (C1.3) (in respect of the Charging Methodology)	
C1.4 The First Relevant Policy Objective:	☐
(a) applies in relation to Smart Metering Systems installed (or to be installed) at Domestic Premises; and (b) requires the Charging Methodology to ensure that Charges (other than Charges for Elective Communication Services) in respect of such Smart Metering Systems do not distinguish (whether directly or indirectly) between Energy Consumers at Domestic Premises in different parts of Great Britain.	

C1.5 The Second Relevant Policy Objective is that, subject to compliance with the First Relevant Policy Objective, the Charging Methodology must result in Charges that:

- (c) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act;
- (d) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act;
- (e) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and
- (f) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.



Statement of how the proposed variation would better facilitate the achievement of the SEC Objectives:

Please outline your reason for raising this Modification and how implementation of the variation would better facilitate the achievement of one or more of the SEC Objectives, than if the variation were not made.

C1.1 (a) *'facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.'*

The implementation of 'triage' arrangements for Communication Hubs will allow Suppliers to introduce best practice arrangements, enabling the identification of Communication Hubs that are able to be recycled for future use. The new arrangements proposed by this modification would be positive in that it would save resources (time, money and environmental) by allowing Communication Hub re-use where appropriate and by preventing the return/transport of otherwise fit for purpose Communication Hubs around the country for disposal.

C1.1 (b) *'enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence.'*

With Suppliers and MOPs using their own triage facilities, rather than automatically returning all Comms Hubs to the DCC, it will be a more efficient, economic and co-ordinated use of resources and allow the DCC to continue their mandated business with limited change. The reuse of Comms Hubs should lower the charges payable for the Mandatory Business Services as money is not wasted transporting, triage and sending out perfectly good Comms

Hubs. The new triage process could also mean less Comms Hubs are ordered and manufactured as Comms Hubs stay in the supply chain.

4.2 Impacts

Statement of impact on Greenhouse Gas Emission:

Please state whether the proposed variation would have a material impact on Greenhouse Gas Emissions.

The new triage process will avoid the unnecessary waste of Comms Hubs where no fault has been identified. Re-use of these assets will reduce the volume of Comms Hubs that are ordered, manufactured and transported.

Statement of impact on which parts of the SEC would need amending (e.g. proposed legal drafting):

Please state the parts of the SEC or the SEC Subsidiary Documents that would require amendment. You may also include any proposed legal drafting you have.

To be developed by the working group, however it is anticipated that the Communication Hub Installation & Maintenance Support Materials (CHIMSM) documentation will require amendment, including Section 9 of this document and potentially SEC Section F.

Statement of impact on likely changes to other Energy Codes:

Consequential Impacts to other industry codes are not anticipated.

Statement of impact on likely Party Categories:

Large Supplier Parties	☒	Small Supplier Parties	☒
Electricity Network Parties	☐	Gas Network Parties	☐
Other SEC Parties	☒		
The working group will be required to clarify the impacts upon SEC parties, however it is anticipated that Suppliers, CSPs and the DCC will be impacted.			

Statement of impact on Central Systems:

DCC Systems	☒	User Systems	☒
Smart Metering Systems and/or Communications Hubs	☒	Other (i.e. on Smart Metering Key Infrastructure, or security)	☐

The Order Management System and the billing system operated by the DCC may be impacted by this change, this will need to be assessed during the development stage.

This change will be elective for Supplier Parties, therefore impacts to User Systems will not be mandatory.

6. Proposed Timetable

Proposed Timetable for Modification Proposal:

Please state your recommendation for the timetable of implementation for the proposed variation, including the proposed implementation date.

The proposed timetable below has been put together around a June 2017 implementation date, noting that the implementation date may need be flexible to accommodate the necessary implementation (and testing lead times), if the Modification is approved..

The proposed timetable includes some assumed timescales for the turnaround of DCC detailed Impact Assessments (40 Working Days) and Authority (SoS) determination (25 Working Days),

The proposed timetable doesn't currently capture the 3 month EC notification pause if the changes associated with this Modification require EC Notification as part of the Authority (SoS) approval process.

Stage	Start	Finish
Stage 1 - Modification Proposal Raised	Thu 18/02/16	Fri 04/03/16
Stage 2 - Panel reviews IMR	Mon 07/03/16	Fri 11/03/16
Stage 3 - Refinement process*	Mon 21/03/16	Fri 02/09/16
Working Group 1	March 2016	
Working Group 2	May 2016	
Working Group 3	July 2016	
WG Consultation	August 2016	
Working Group 4	August 2016	
Stage 4 - Modification Report stage**	Mon 05/09/16	Wed 12/10/16
Stage 5 - Change Board vote	Thu 13/10/16	Wed 19/10/16
Stage 6 - Authority Decision	Thu 20/10/16	Fri 25/11/16
Implementation	June 2017	

*The Refinement Process includes several additional steps, which will be outlined in more detail in the Initial Modification Report.

** Includes second consultation on the Modification Proposal, followed by Panel's review of the Draft Modification Report, and Panel's decision on whether to proceed to a Change Board vote on the Modification Proposal.

8. Additional Information

Additional information:

APPENDIX 1: Glossary of Terms

The table below illustrates useful definitions of the terms used in this form. If you require any further information please contact the [SECAS Helpdesk](#).

Term	Definition
DCC Systems	Means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code (Section A1, SEC Stage 3.0). The Proposer may wish to consider anticipated impacts on the DCC Licensee's enterprise systems (e.g. billing) or the Data Service Provider or Communications Service Providers.
Fast-Track Modifications	Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).
General SEC Objectives	Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0). The SEC Objectives are those objectives that the SEC has been designed to achieve.
Greenhouse Gas Emission	Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).
Other Systems	Other systems identified in the section Statement of Impact on Central Systems. The Proposer may wish to consider Prepayment vendors, Electricity Central Online Enquire Service (ECOES), Single Centralised Online Gas Enquiry Service (SCOGES), BSC Settlement Systems, etc.
Path Type	Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: • Path 1 Modifications: Authority-led (Section D2.4/D2.5, SEC Stage 3.0) • Path 2 Modifications: Authority Determination (Section D2.6, SEC Stage 3.0) • Path 3 Modifications: Self-Governance (Section D2.7, SEC Stage 3.0) • Path 4 Modifications: Fast-Track Modifications (Section D2.8, SEC Stage 3.0)

Party Category	Means one of the following categories: (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; or (e) the Other Sec Parties collectively. (Section A1, SEC Stage 3.0).
Smart Metering Systems	Means a system installed at premises for the purposes of the Supply of Energy to the premises that, on the date it is installed, as a minimum; (a) consists of the apparatus identified in; (b) has the functional capability specified by; and (c) compiles with the other requirements of, the Smart Metering Equipment Technical Specification that is applicable at the date (Section A1, SEC Stage 3.0). In summary, this includes: • Gas Smart Metering Equipment; • Electricity Smart Metering Equipment; • In Home Display; • Prepayment Interface Device; and • HAN Connected Auxiliary Load Control Switch.
Urgent Proposal	Means a Modification Proposal deemed an Urgent Proposal where the Authority directs the Panel to treat the Modification Proposal as an urgent Proposal (whether following a referral by the Panel pursuant to Section D4.5, or at the Authority's own initiation) (Section D4.5/D4.6, SEC Stage 3.0).
User Systems	Means, in respect of each User (DCC User), the Systems of that User (including, where relevant, those of its Supplier Nominated Agent) used in relation to the Services and/or Smart Metering Systems (Section A1, SEC Stage 3.0). The Proposer may wish to consider Suppliers; Network Operators; Registration Data Providers; Other DCC Users (e.g. Authorised Third Parties / Switching Sites); Supplier Nominated Agents.