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SECMP0039

‘Communication Hub returns notification mechanism for Other SEC Parties’

Modification Report

Version 1.0

Administered by



About this document

This document is the Modification Report for SECMP0039 '[Communication Hub returns notification mechanism for Other SEC Parties](#)'. It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

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This document also has four annexes:

- **Annex A** contains the business requirements for the proposed solution.
- **Annex B** contains the redlined changes to the SEC required to deliver the proposed solution.
- **Annex C** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex D** contains the full responses received to the Working Group Consultation.

1. Summary

SEC Section F5 'Communication Hub Forecasts & Orders' allows any SEC Party to place orders for Communications Hubs. Between the Communications Hubs delivery acceptance and the installation at a premise, the SEC Party that placed the order requires a mechanism to notify the DCC in the event of needing to return a Communications Hub. This can be done by submitting the corresponding DCC User Interface Specification (DUIS) Service Requests.

Currently, these service requests are only available to Energy Suppliers¹ but some Suppliers use Other SEC Parties to provide a 'full managed service', particularly in regard to the logistics involved in the Smart metering rollout. However, because these service requests are limited only to Supplier Parties, the contracted provider cannot issue these and must instead ask the corresponding Supplier to do so. Allowing other Parties access to the notification and response mechanism will allow any ordering party to return orders on behalf of a number of Energy Suppliers.

The Proposer therefore proposes to extend the Eligible User Roles for DUIS Service Requests 8.14.3 and 8.14.4 to include Registered Supplier Agents (RSA) and for the ordering Party to be provided with a response to acknowledge the acceptance or failure of the notification.

SECMP0039 will impact on the DCC and on Other SEC Parties who may need to issue these service requests on behalf of Suppliers. The central implementation costs are around £202,000. If approved, SECMP0039 is targeted for inclusion in the November 2019 SEC Release.

¹ Import Supplier or Gas Supplier

2. Background

Returning of Communications Hubs Pre-installation

The SEC currently allows any SEC Party to place orders for Communications Hubs. Between the Communications Hubs delivery acceptance and installation at a premise, the SEC Party that placed the order requires a mechanism whereby they can notify DCC in the event of needing a fault or no fault return. This can be done by submitting DUIS Service Requests 8.14.3 'Communications Hub Status Update – Fault Return' or 8.14.4 'Communications Hub Status Update – No Fault Return'.

What is the issue?

Currently, these two Service Requests can only be submitted by SEC Parties in the role of Energy Suppliers (either an Import Supplier or a Gas Supplier). Other Parties that may order and install Communications Hubs on behalf of a Supplier cannot submit these requests and must instead request the Supplier do so on their behalf.

Allowing these other Parties access to this notification and response mechanism will allow an ordering party acting on behalf of Suppliers to be able to trigger a Communications Hub return directly. This will enable a more efficient process for returning Communications Hubs and help to reduce the demand on each individual Energy Supplier. This modification was raised to allow all SEC Parties who order Communications Hubs a mechanism to execute a complete ordering and returns process.

SECMP0039 was raised by Lowri Beck on 16 July 2017 to resolve this issue.

3. Solution

Proposed Solution

The Proposer proposes to extend the Eligible User Roles for DUIS Service Requests 8.14.3 and 8.14.4 to include Registered Supplier Agents (RSAs) and for the ordering Party to be provided with a response to acknowledge the acceptance or failure of the notification

The business requirements for the solution can be found in Annex A.

Legal text

The changes to the SEC required to deliver the proposed solution can be found in Annex B.

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

This modification will allow DCC Users registered as RSAs to be able to submit Service Requests 8.14.3 and 8.14.4 if they wish.

DCC System

DCC Systems will need to be amended to receive and validate Service Requests 8.14.3 and 8.14.4 from RSAs.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex C. Please note that in the Impact Assessment the term Supplier Nominated Agent (SNA) is used instead of Registered Supplier Agent (RSA). SNA is the equivalent term in the DCC User Gateway Interface Design Specification (DUGIDS) to RSA in DUIS. As the legal text changes in Annex B are to the DUIS document, this will involve adding 'RSA' to the list of eligible users.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AD 'DCC User Interface Specification v2.0'

Other industry Codes

This modification will not impact on other Industry Codes.

Greenhouse gas emissions

This modification will not impact on Greenhouse gas emissions.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is £201,650. The breakdown of these costs is as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-integration Testing (PIT)	£201,650
System Integration Testing (SIT), User Integration Testing (UIT) and implementation	None

Please note that the costs for SIT, UIT and implementation will be covered under the SMETS1 Enrolment and Adoption programme, as long as SECMP0039 is included in the November 2019 SEC Release. These costs will therefore not be incurred as part of this modification.

Additionally, the DCC have identified a total of £22,698 for Operational costs over a 28-month period. More information can be found in the DCC Impact Assessment response in Annex C.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activity to be undertaken for this is updating the SEC and releasing the new version to the industry.

SEC Party costs

SEC Parties may incur system upgrade costs necessary to enable them to use the Service Requests and testing costs; these will be dependent upon their individual testing approach.

6. Implementation approach

Approved implementation approach

The Panel has agreed an implementation date of:

- **7 November 2019** (November 2019 SEC Release) if a decision to approve is received on or before 20 February 2019; or
- **25 June 2020** (June 2020 SEC Release) if a decision to approve is received after 20 February 2019 but on or before 19 June 2019.

The DCC have indicated that they could implement SECMP0039 in the November 2019 SEC Release if the Change Board approves this modification under Self-Governance in February 2019.

Furthermore, the DCC have informed the Panel that the post-PIT costs for any modifications included in the November 2019 Release will be absorbed under the costs for the SMETS1 Enrolment and Adoption changes due to go live around the same time, and so would not be incurred under the modification's implementation costs.

7. Discussions and development

Discussion of Proposed Solutions

The Working Group initially considered two proposed solution options:

- Make changes to the Eligible User Roles within Service Requests 8.14.3 and 8.14.4; and/or
- Add additional functionality into the DCC's Operational Management Services (OMS) systems.

The Working Group considered that solving this issue via the OMS system would avoid the complications of the relevant participants needing to become a DUIS User. However, the Working Group also noted this option may be limited as there is a need for making sure that the other actions triggered by the DUIS Service Request take place, which means this option would still require corresponding changes to be made to DUIS. Suppliers would also be impacted by this option.

The DCC Preliminary Assessment concluded that this solution would be unfeasible as it would result in a manual process. The DCC noted to the Working Group that there were two OMS systems, for each of the two Communication Service Providers, with no integration between these and the Data Service Provider. In any event, even if this option was progressed, changes would still be required to DUIS as any request submitted via the OMS would still need the corresponding Service Request (8.14.3 or 8.14.4) to be created.

The Proposer and the Working Group therefore agreed to progress only the option of allowing all potential participants that can order Communications Hubs to have access to Service Requests 8.14.3 and 8.14.4. This would be achieved by extending the list of eligible senders for these requests.

Which roles should be added to the list of Eligible Users?

The Working Group initially believed that the list of Eligible Users for Service Requests 8.14.3 and 8.14.4 should be extended to cover all potential participants that could order Communications Hubs, and therefore may need to return them prior to installation. During the DCC Preliminary Assessment, the DCC believed that this could be achieved by adding 'Registered Supplier Agent' (RSA) to the list.

The Working Group considered whether the addition of RSA would be sufficient, noting that this would not cover participants such as Meter Asset Providers (MAPs). One member believed the basic principle that Service Requests should only be made available to those that needed them. Another member, who was from a MAP, did not believe they needed to be included in the list of Eligible Users, and was comfortable with only adding RSA.

The Working Group agreed that, as long as respondents to the Working Group Consultation did not identify any issues, the addition of RSA would be sufficient to deliver the SECMP0039 solution. No respondents to the consultation highlighted any issues with this approach.

What validation should be performed on submissions from RSAs?

The Working Group sought to clarify what validation the DCC needed to perform on a Service Request received from an RSA. In addition to the basic validation of confirming the sender was an RSA, members wanted the DCC to validate that the RSA was submitting a request on behalf of a Supplier for which it was confirmed they were working for. One member noted they did not want an

RSA to send a request on their behalf when it was not working for them. The Working Group agreed that this validation needed to be included in the solution.

8. Conclusions

Benefits and drawbacks

The Proposer and the Working Group have identified the following benefits and drawbacks in implementing this modification:

Benefits

- This will remove the need for Small Suppliers to become involved when one of their Supplier Agents needs to return a Communications Hub, which streamlines the process and reduces the burden on them. Members note that while Large Suppliers are able to manage this themselves, Small Suppliers don't have the same logistics and so often use agents to perform activities such as installing Communications Hubs on their behalf. Efficiency in this process is reduced if the agents have to request the Small Supplier submit Service Requests on their behalf, each time they need to trigger a return, incurring costs on the Small Supplier in time and effort.
- It allows for greater consistency of service provided by agents across the industry, where agents can operate on behalf of their Suppliers. Members note that the Communications Hubs returns process does not currently align with the wider industry standard of allowing agents to work on behalf of Suppliers, due to them being unable to submit the corresponding Service Requests; this change would remove this impediment and bring this returns process in line with this model.
- Some members believed it may also reduce operational costs, which benefits the consumer. However, the DCC clarified that a monthly shipment of returns would reduce costs but if smaller users were to send back Communications Hubs individually then it could be more costly. In any event, this change would not affect the subsequent administration for returning a Communications Hub, only the means by which it is triggered and who it can be triggered by.

Drawbacks

No drawbacks were identified by the Working Group.

Proposer's rationale against the General SEC Objectives

Objective (a)²

The Proposer believes that SECMP0039 will better facilitate SEC Objective (a). The efficient procurement of Communication Hubs by enabling ordering parties to support Suppliers, in particular Small Suppliers, in the effective provision, installation and operation of Smart Metering. Suppliers who seek Other SEC Parties to provide a 'full managed service', particularly in regard to the logistics involved in the Smart metering rollout, will realise reduced costs and administrative burden.

² Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

Objective (d)³

The Proposer believes that SECMP0039 will better facilitate SEC Objective (d) as it will allow all ordering parties to be able to carry out a complete ordering and returns process. It will also help lower costs and administrative burden for smaller Suppliers. This change will also bring the Communications Hubs returns process in line with the wider industry approach of allowing agents to perform tasks on behalf of their Suppliers, and so corrects a flaw in the design of this particular process.

Objective (h)⁴

The Proposer believes this modification better facilitates the operation of the Alt HAN arrangements as a complete ordering and returns process would support a co-ordinated installation approach within the Alt HAN arrangements.

Working Group members' views

The majority of the Working Group agreed that the modification will better facilitate Objectives (a) and (d) as set out by the Proposer, but one member was neutral as they could not see an overall benefit for the costs that this modification would incur. The Working Group believes SECMP0039 to be neutral to Objective (h).

Consultation respondents' views

There were four respondents to the Working Group Consultation (three Large Suppliers and one Network Party). Two respondents supported the modification and two did not, their reservations mainly based on the costs estimated in the Preliminary Assessment to implement the change. One respondent commented that the costs to Large Suppliers in implementing this modification would duplicate costs already borne for operational business, meaning the Large Supplier constituency would effectively be funding the operational business of Small Suppliers with regard to Communications Hubs returns. The full responses received can be found in Annex D.

Panel's conclusions

The Panel agreed that this modification should proceed to Modification Report Consultation as a Self-Governance Modification.

³ Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

⁴ Facilitate the establishment and operation of the Alt HAN Arrangements.

Appendix 1: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
Alt HAN	Alternative Home Area Network
CH	Communications Hub
DCC	Data Communications Company
DUGIDS	DCC User Gateway Interface Design Specification
DUIS	DCC User Interface Specifications
MAP	Meter Asset Provider
OMS	Order Management System
PIT	Pre-Integration Testing
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	SEC Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SNA	Supplier Nominated Agent
SEC	Smart Energy Code



If you have any questions on this modification, please contact:

Ali Beard

020 3970 1105

alison.beard@gemserv.com

Smart Energy Code Administrator and Secretariat (SECAS)

8 Fenchurch Place, London, EC3M 4AJ

020 7090 7755

sec.change@gemserv.com