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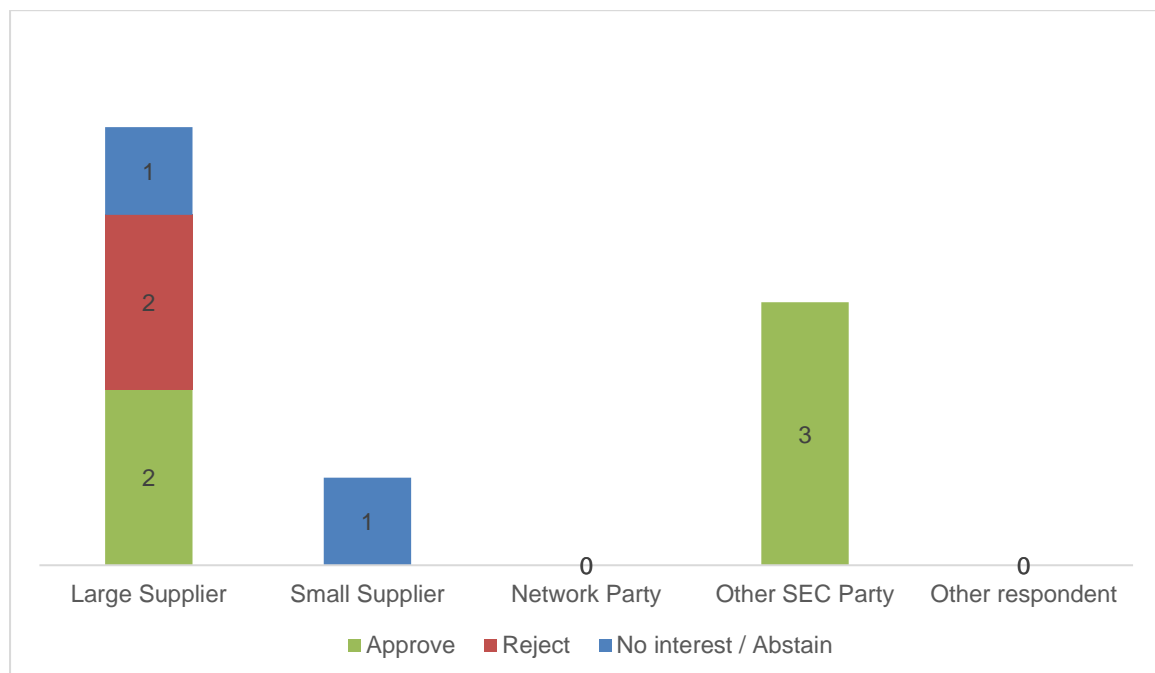
# SECMP0039 ‘Communication Hub returns notification mechanism for Other SEC Parties’

## Modification Report Consultation responses

### About this document

This document contains the full non-confidential collated responses received to the SECMP0039 Modification Report Consultation.

### Summary of responses



## Question 1: Do you believe that SECMP0039 should be approved?

Question 1			
Respondent	Category	Response	Rationale
First Utility	Large Supplier	Approve	This modification will make the process of returning Communications Hubs more efficient by allowing Registered Supplier Agents to return on behalf of the Supplier. This modification better facilitates SEC Objective (a) in the efficient operation of Smart Metering Systems and SEC Objective (h) facilitates and establishes the operation of the Alt Han Arrangements.
SMS Plc	Other SEC Party	Approve	As a SEC Party forecasting, ordering and managing distribution of CH's for multiple suppliers, it is essential the returns flows are simple and generic across multiple suppliers too. The added complexity of getting a Supplier (or multiple Suppliers) to processes these SR's for stock they do not handle directly is inefficient. SMS supports SECMP0039 and would appreciate a fast turn around to implementing this change
IMServ Europe Limited	Other SEC Party	Approve	<p>IMServ is a Meter Operator installing Electricity Smart Meters on behalf of multiple Energy Supplier customers. IMServ is also a SEC Party in its own right and is a User of DCC Services in both the roles of RSA (Registered Supplier Agent) and OU (Other User). IMServ are active in ordering Comms Hub from the DCC and face the issues identified by this modification with difficulties returning Comms Hubs to the DCC, where required, prior to their installation.</p> <p>As such, IMServ is in favour of this modification of allowing the RSA User to become an Eligible User for Service Request Variants 8.14.3 and 8.14.4. IMServ can confirm that if implemented under this SEC Modification, as an existing RSA User, we would seek to use this functionality and it would make the IMServ process more efficient for returning Comms Hub to the DCC and remove the existing inconsistencies in approach.</p>

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			<p>Without this modification change being implemented,</p> <ul style="list-style-type: none"> <li>• IMServ's only option currently is to manually raise return requests via the DCC Service Desk and assume that this process works and the returns are processed correctly (note, we have not tested this process yet in Live operations) and/or by working in combination with a friendly Energy Supplier who is willing to help us in returning Comms Hubs prior to their installation, to send these service requests on our behalf where required. This means operating bespoke processes and increasing our operational costs.</li> <li>• The Comms Hub return process is very much a manual process currently and we are reliant on the DCC Service desk processing returns information manually via spreadsheet data which can lead to data inaccuracies and increased operational costs for us to pass on to our Energy Supplier customers. Having an automated system ability to pass information between parties is always preferable and reduces longer term operational costs.</li> </ul> <p>We are pleased to note that members of the working group noted that the Communications Hubs returns process does not currently align with the wider industry standard of allowing agents to work on behalf of Suppliers, so any recognition and re-alignment of the SEC to abide by these arrangements are welcomed.</p> <p>We do however note the larger than expected implementation costs and recognise that this may deter some SEC Parties from supporting this modification.</p>
Bryt Energy	Small Supplier	Abstain	We support the implementation for the MOD.

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			<p>The modification clearly addresses a clear benefit for RSA Commercial Agents allowing reduction in costs to operating and managing CHUBS and streamlines the process for RSA Commercial Agents.</p> <p>This function allows Commercial Agents to manage returns processes for CHUBS they have ordered and purchased and allows direct process control. This reduces cost on supplier and/or DCC in managing returns and is a simple change with minimal impacts.</p> <p>We do not support the Impact Assessment provided by DCC for several reasons of this MOD.</p> <ul style="list-style-type: none"> <li>• During the working groups there is no documentation to suggest any changes or impacts to GFI or the CHUB.</li> <li>• It is unclear why GFI needs to have Use Cases added as this is primarily to support GBCS Use Cases in payloads to devices. This MOD is to allow an existing DCC Service Request that creates a remedy case for DCC to manage with the CSP. This is not a device side change or impact.</li> <li>• GFI does actually contains functionality to add Use Cases by Users and would assume this is negligible in terms of creation.</li> <li>• The detailed impact assessment does not breakdown the individual service providers costs.</li> <li>• The detailed impact assessment does not breakdown the number of days utilised.</li> <li>• DCC has increased impact on SP Services, however failed to reduce SP Services due to manual email requests from RSA's to the service desk email.</li> </ul>

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			<ul style="list-style-type: none"> <li>Testing includes CHUB regression and new CHUB Functionality, which there are no requirements to undertake: <ul style="list-style-type: none"> <li>2 cycles of PIT regression testing of Communications Hub</li> <li>PIT testing of Communications Hub new functionality: new GBCS messages expected (awaiting outcome of CRP) and new SRVs</li> </ul> </li> <li>What new functionality is being introduced to the CHUB's? Does this mean new firmware for all CHUB's?</li> </ul> <p>The requirements are clear to take an existing Service Request and allow an additional User to access that Service Request for only devices that have not been commissioned. DCC has recommended to avoid complication and reduce effort to reused E5 Error code rather than create a new error code.</p> <p>This would assume to have been implemented by the SR checking for an allowed User and then the CHUB inventory for a status of pending and rejecting if the CHUB had ever been commissioned. One would assume this to be DCC Remedy based to CSP with use of the SMI Inventory.</p> <p>Unfortunately, the detailed impact assessment is not detailed enough to explain why changes are being made the CHUB and GBCS Use Cases, as there appears to be no logical explanation.</p> <p>Based on an average market rate of £1500 per day, this change results in 133 working days of effort, which for the effort does not appear to be value for money.</p>
Calvin Asset Management Ltd	Other SEC Party	Approve	We believe that this modification supports SEC objective (a) in that it will enable small suppliers to use a fully managed service provider approach thus facilitating the efficient

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			provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain by those small suppliers.
E.ON Energy Solutions	Large Supplier	No	<p>We do not believe that this Modification better facilitates any of the SEC objectives, furthermore it is our belief that burdening the consumers of one constituency for the operational ease of another constituency directly contravenes effective competition between Parties engaged in the Supply of Energy and consequently SEC objective d. It is our view that where certain Parties wish to see this solution implemented to facilitate their Supply businesses, this should be raised via the appropriate mechanism i.e. Elective Services.</p> <p>In addition we would note that no demonstrable cost-benefit case has been provided for this Modification. The DCC have noted costs that do not appear to have robust justification, for example, why £22,698 operational costs would be required as a result of an additional Eligible User role for two Service Requests (SRs). The use-case for this Modification is also flawed in our view: where the Parties that may benefit from this Modification are able to submit their own Communications Hub (CH) returns post-installation, the value of this solution appears to be limited to the roll-out of Smart Metering Systems. That is to say, where the DCC implement their CH Firmware process as recently consulted on, the majority of CHs will likely be returned post-installation rather than pre-installation as has been the case to-date due to poor quality CH Firmware.</p>
SSE Retail	Large Supplier	Abstain	<p>We neither approve nor disapprove the modification.</p> <p>This modification is to provide Registered Supplier Agents (RSAs) with the ability to send SR 8.14.3 and 8.14.4 to the DCC, to return Communications Hubs on behalf of a Supplier. Although there is no immediate impact on SSE Retail, there will be costs associated to regression testing of our systems and processes to ensure we are not affected by the change, and our portion of the central implementation costs.</p> <p>Whilst we recognise there is logic in introducing this capability for RSAs, there are no quantifiable benefits provided in the Modification Report, only statements related to reduced costs and administrative burden for suppliers who utilise the RSAs as 'managed services'. When considering the central implementation costs, alongside operational costs, and the</p>

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			need for suppliers to regression test, we do not believe there is sufficient evidence presented that this would better facilitate the General SEC Objectives.
npower	Large Supplier	We are supportive of this modification	-
EDF Energy	Large Supplier	Reject	<p>We believe that this change should be sent back to the Working Group in order for the business case for this change to be more fully developed. While we recognise the business drivers for making this change, and agree that it seems sensible, there is no quantification of the benefits to be gained as a result of making this change. We have no basis on which to determine whether the significant costs associated with this change are justified by the benefits.</p> <p>We note that, in their recent letter to the SEC Panel chair in regards to the Implementation Date for SECMP0023, Ofgem stated that they 'expect to see the cost benefit case for SEC modifications to be thoroughly scrutinised so that SEC Parties can be confident of the best value being achieved.' While SECMP0039 is a Path Modification and subject to self-governance rather than Authority determination, the same principles should be applied by the Change Board.</p>

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

Question 2		
Respondent	Category	Comments
First Utility	Large Supplier	N/A
SMS Plc	Other SEC Party	-
IMServ Europe Limited	Other SEC Party	We note that in several sections there are references to GBCS use cases in the DCCs FIA response (e.g. section 4 testing) “..support the new use cases CS02f and CCS07”, we suggest that this is an error, misleading and should be removed as both these SRVs 8.14.3 and 8.14.4 are defined as DCC Only and there are no associated GBCS Commands. Would removing these from the testing scope have any impact on the DCCs implementation costs i.e. reduce as these changes and test are not required? Or is this just a copy and paste typo from another modification form?
Bryt Energy	Small Supplier	We respectfully ask that DCC return an updated Impact Assessment containing:  Clear solution and reason for the GBCS Use Case changes to GFI and “testing of Communications Hub new functionality”?  Breakdown by each service provider and labour cost and day used based on Schedule 7.1.  DCC’s clear costs for management and implementation separate from service provider costs.  Access to Schedule 7.1 rates for the 2018-2019 contract year.
Calvin Asset Management Ltd	Other SEC Party	The SEC is currently inconsistent in that it allows any SEC Party to order communications hubs but does not allow those same ordering parties to return those hubs pre-installation. Until installation there may not be a supplier associated with the hub thus making return difficult.  By removing this inconsistency from the SEC we believe that small suppliers will be encouraged to use roll out smart meters to their customers using fully managed services that are already available in the market.



Question 2		
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		We acknowledge that the modification will not provide any benefit from large suppliers during the main rollout period when their installation volumes are high but it is possible that large suppliers will also be able to benefit from this change later in their programme when they look to support a low volume installation programme.
E.ON Energy Solutions	Large Supplier	<p>The Impact Assessment does not appear to have demonstrated the design or build of the validation requirement (Business Requirement 2), so we are not certain that the solution meets the requirements of the Modification.</p> <p>Although the Modification Report does not provide the Modification Path under which this Modification is progressing, it has previously been recorded as a Path 3 Modification. We do not believe that this ought to be a Path 3 Modification given the financial implications on Large Suppliers to pay for something which is effectively an operating cost for Suppliers choosing to utilise a ‘full managed service’*, a cost which we ourselves already fund for our own businesses.</p> <p>*SEC Section D2.6</p> <p>Without understanding the risk profile of introducing change to the DCC’s Systems whilst the Enrolment and Adoption activities are being implemented/tested we are not supportive of a November 2019 implementation date.</p>
SSE Retail	Large Supplier	<p>The costs associated to this modification provide little to no benefit to larger suppliers, who would bear a considerable proportion of the costs.</p> <p>We have implemented processes and solutions to support the returns of Communications Hubs, therefore our provision for Installation, Operation and Interoperability of Smart Metering Systems would continue and be unaffected by this modification.</p>
npower	Large Supplier	-
EDF Energy	Large Supplier	-

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