

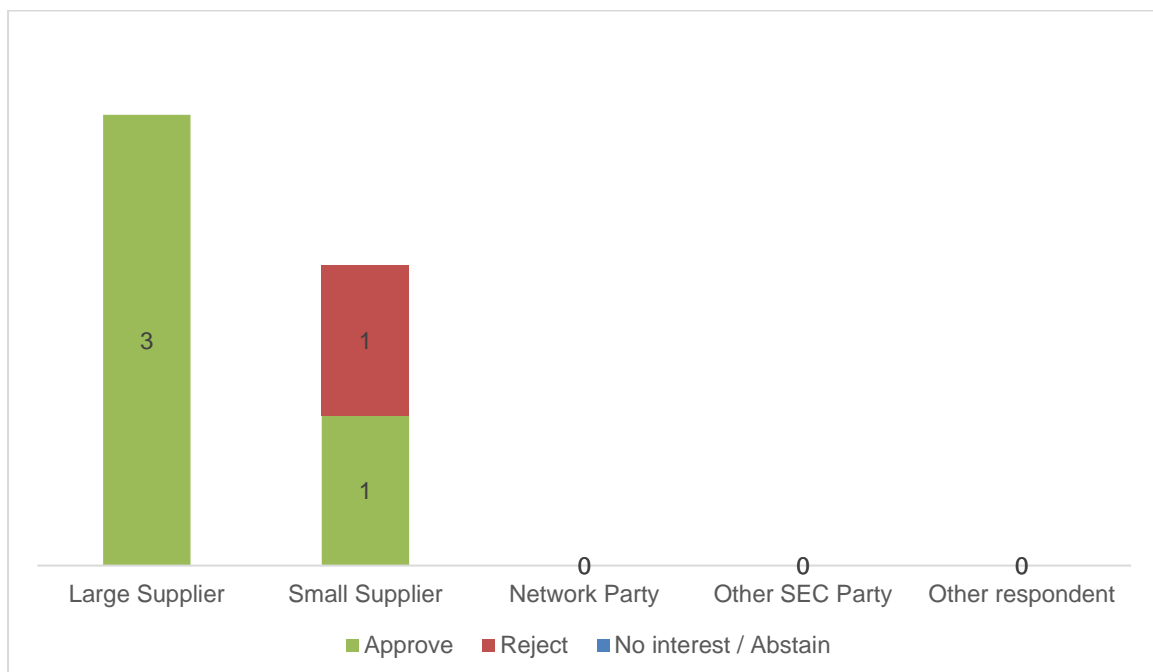
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# SECMP0060 ‘Amend Requirements to remove ‘Pending’ devices from SMI’ Modification Report Consultation responses

## About this document

This document contains the full non-confidential collated responses received to the SECMP0060 Modification Report Consultation.

## Summary of responses



## Question 1: Do you believe that SECMP0060 should be approved?

Question 1			
Respondent	Category	Response	Rationale
Bryt Energy	Small Supplier	Reject	<p>Currently we feel this MOD has jumped straight into solution mode, without understanding the clear requirements and use cases involved and the clear impact to SEC User and DCC processes due to the current solution.</p> <p>We recommend the following actions be undertaken:</p> <ul style="list-style-type: none"> <li>A current exemption of SEC to delete any devices &gt; 12 months that are in a pending state, until clear business and SEC requirements are understood;</li> <li>SSC Clearly articulate the requirements to delete devices &gt; 12 months and the clear use case they are attempting to mitigate: <ul style="list-style-type: none"> <li>Is it applicable for all devices regardless of their historic status?</li> <li>Is it applicable to that have not yet been commissioned?</li> <li>Is it applicable to all device types?</li> <li>Is it applicable to devices yet to be commissioned and sitting currently in warehouses?</li> <li>What is the actual security risk we are mitigating with the deletion of devices &gt;12 months?</li> </ul> </li> <li>SSC comments suggesting a move to 36 months, with moving back to 12 months when possible, conveys that the requirements are not security critical;</li> </ul>

Question 1			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> <li>When the 12-month pending deletion obligation was created, it was not foreseen that CHUB would have extended time stocked in SEC User Warehouses;</li> <li>Confirm if back logs of CHUB's mean that this will be a continued issue and appropriate SEC Requirements drafted;</li> <li>Based on the above, resolve a conflict of obligations in SEC that require DCC to; <ul style="list-style-type: none"> <li>Delete devices at pending status after a timeframe;</li> <li>Keep an accurate inventory;</li> </ul> </li> </ul> <p>Develop a solution based on the revised requirements, if any.</p>
<b>Smartest Energy</b>	Small Supplier	Approve	<p>This modification would better facilitate SEC Objective's (a) and (f) by increasing efficiency resulting in less administrative work, along with reducing the number of devices needing to be re-notified.</p> <p>We supply to several customers with unclear tenancy/occupation dates. If the amount of time a device can be listed as 'Pending' is increased, it would eradicate concerns of devices being removed from the SMI and reduce charges that would be incurred to industry parties.</p>
<b>EDF Energy</b>	Large Supplier	Approve	<p>We believe this change would better facilitate SEC Objective (a), as it would make the provision of smart metering systems more efficient by allowing compliant devices that are capable of functioning correctly to be installed, even if they have been 'Pending' on the SMI for some time.</p> <p>This change would also better facilitate SEC Objective (b), as it would enable DCC to retain data relating to Comms Hubs and charge Parties more accurately.</p> <p>We believe that this change is neutral against the other SEC Objectives.</p>

Question 1			
Respondent	Category	Response	Rationale
E.ON Energy	Large Supplier	Approve	E.ON is supportive of the proposed increase to the time period before removal from the SMI (12 months to 36 months).
npower	Large Supplier	Approve	

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

Question 2		
Respondent	Category	Comments
Bryt Energy	Small Supplier	As this is critical and impacting we would envisage a quick piece of work and turnaround to resolve the issues highlighted in Q1. With this completed DCC can revise the solution.
Smartest Energy	Small Supplier	N/A
EDF Energy	Large Supplier	
E.ON Energy	Large Supplier	<p>E.ON has the following points which we seek further clarification:</p> <ol style="list-style-type: none"> <li>1. The DSP solution outlined on page 19 of the Modification Report document suggest that the tactical solution progressed under SCR137 has already been delivered. Is this the case? Our understanding is that it has, or at least the DSP activity to start removing devices from the SMI that are greater than 12 months old is not being done, in which case what exactly is this modification going to deliver other than the changes to the SEC obligations/legal text?</li> <li>2. The consultation suggests that some sort of manual/manually triggered activity is currently required to remove devices. Is this the case? If so, then is the development cost quoted in the consultation (circa £71k + testing costs) intended to cover delivery of a configurable value and/or automation of the removal from SMI?</li> <li>3. If the answer to Q2 is yes, then it could be argued that Suppliers are being asked to cover the costs of a DSP process improvement, given that the objective of avoiding devices being removed from the SMI could be achieved by doing nothing i.e. the DSP not running their manual/manually triggered process to remove the devices (which has already been agreed under SCR137?)</li> <li>4. If the proposal is going to be accepted as is, then E.ON needs to understand the testing costs. They are not stated in the proposal and should be understood before they can be agreed. Please can you provide these?</li> </ol>

Question 2		
Respondent	Category	Comments
		5. How does this proposal fit with the CSP/DCC aspiration to support the current firmware version & - 1 version in terms of the BAU firmware upgrade process? If Suppliers can hold stock that is up to 36 months old, then there is a risk that the firmware versions will be older than current -1. The upgrade for those versions becomes complicated if we have to apply incremental upgrades to reach the current version, instead of 'leap-frogging' to the current version. Has this been considered?
npower	Large Supplier	none