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**Modification Report**

**Version 1.0**

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**MP098**

**‘Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 3’**

About this document

This document is a draft Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has two annexes:

* **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
* **Annex B** contains the full responses received to the Refinement Consultation

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# Summary

This proposal was raised by Paul Saker from EDF Energy.

The Department for Business, Energy and Industrial Strategy (BEIS) has previously implemented Issue Resolution Proposals (IRPs) via BEIS-led designations; however, this process was handed over to the Smart Energy Code Administrator and Secretariat (SECAS) for changes to be implemented through the Modifications Process. To improve efficiency, it was agreed these changes should be progressed under a single proposal at regular intervals.

This Proposal has been raised to introduce 20 non-Data Communication Company (DCC) System impacting IRPs into the SEC.

This Proposed Solution will require new versions of the Smart Metering Equipment Technical Specifications (SMETS) and the Great Britain Companion Specification (GBCS), which will subsequently impact all SEC Parties.

Implementation cost and effort for this modification is limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort to update the SEC. If approved, this modification is targeted for the November 2020 SEC Release. This modification will impact all SEC Parties.

# Issue

## What are the current arrangements?

### Issue Resolution Proposals

IRPs identify issues within the SEC Technical Specification documents and put forward a solution to the identified problem. BEIS took the lead in developing the Technical Specifications that sit under the SEC during the early stages of the Smart Metering Implementation Program. BEIS has taken responsibility for receiving and responding to issues raised internally, by the DCC and by other interested Industry Parties. Since inception, several hundred issues have been raised in relation to technical specifications under the SEC through the Technical Specification Issue Resolution Sub-group (TSIRS). In some cases, these queries have been resolved by providing an explanation of the specifications, whilst other have resulted in proposed amendments to the specifications in the form of IRPs.

## What is the issue?

This Proposal has been raised to implement 20 non-DCC System impacting IRPs, which can be found in the table below.

IRPs identify issues in the SEC Technical Specification documents. The IRPs included in this proposal require changes to the GBCS and the SMETS, with initial key impacts identified by SECAS below.

| Non system impacting IRPs | | | |
| --- | --- | --- | --- |
| IRP number | IRP title | Impacted Technical Specification | IRP document |
| IRP547 | Default Response in GCS21k message ‘profile cluster’ flag v0\_1 | GBCS |  |
| IRP554 | Future Dated command handling if activation in the Past v0\_1 | GBCS |  |
| IRP567 | Tariff prices for Twin-Element ESME query | SMETS |  |
| IRP587 | Marking CCS05-CCS04 deprecated Use Case v0\_1 | GBCS |  |
| IRP588 | Issue Title Mirror Reporting attribute not available in ZCLv4 | GBCS |  |
| IRP589\* | CS02b authentication sequence v0\_1 | GBCS |  |
| IRP590 | References in T16.2 for 81BE 81BF + 8F84 v0\_1 | GBCS |  |
| IRP591\* | Clarification of HCALCS Time Cluster | GBCS and SMETS |  |
| IRP592 | Clarification required for channel change operation | GBCS |  |
| IRP596\* | TransCoS Execution Counters – CS02b query | GBCS |  |
| IRP601 | ZigBee spec reference for removal | GBCS |  |
| IRP594 | Mirroring Tariff Block Counters | GBCS |  |
| IRP605\* | Clarify DLMS COSEM Device Requirements in GBCS V2.1 | GBCS |  |
| IRP606\* | GBCS Glossary change for Encryption Remote Party | GBCS |  |
| IRP608 | Modify SMETS glossary term for Time-of-use Band | SMETS |  |
| IRP600 | Typo Errors in ZB Commands in T7.4 | GBCS |  |
| IRP607\* | Max Demand: Script table LN reference ambiguous | GBCS |  |
| IRP609 | CCS07 Use Case Template Conflict with COSEM | GBCS |  |
| IRP611\* | Discrepancy in CS02a & CS02b for Commands Integrity Verification | GBCS |  |
| IRP614 | Device suspension requirements for Devices on 2.4GHz band | GBCS |  |

\*After the BEIS Auxiliary Proportionate Control (APC) consultation responses were published on 3 February 2020, IRP589, IRP591, IRP596, IRP605, IRP606, IRP607 and IRP611 will be implemented in November 2020 as part of the APC solution.

## What is the impact this is having?

IRPs add clarity and corrections to the Technical Specifications documents. Device manufacturers are required to follow these documents for the specifications of their Devices. As a result, any errors or miscommunication of these specifications will mean the Device will not work as intended. The TSIRS agreed that these are issues and has agreed the solutions. Not implementing these solutions would mean that these problems would remain.

# Solution

## Proposed Solution

Under current practice, each issue raised has had its solution formulated in advance by the TSIRS. Therefore, each IRP included in this modification requires the proposed legal text changes to the relevant document. The IRPs included affect the SMETS and the GBCS as well as the embedded tables included in these documents. The proposed legal text changes can be found in Annex A.

### Technical Specification versions impacted

The next anticipated uplift to the Technical Specifications is in the November 2020 SEC Release. BEIS has drafted and plan to introduce GBCS v4.0 and SMETS2 v5.0 alongside the November 2020 SEC Release. The changes detailed in this modification will made against these draft documents and will be implemented as part of the same uplift; therefore, the version numbers will not change unless the decision to approve is not received in time.

| Technical specification versions introduced by MP098 | | |
| --- | --- | --- |
| Document | November 2020 SEC Release | Post November 2020 SEC Release |
| GBSC | 4.0 | 4.1 |
| SMETS2 | 5.0 | 5.1 |

# 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 proposal will impact all SEC Parties due to the implementation of new versions of the GBCS and the SMETS.

## DCC System

The DCC and the Technical Architecture and Business Architecture Sub-Committee (TABASC) has confirmed that the IRPs included in this proposal do not impact DCC Systems.

## SEC and subsidiary documents

The following parts of the SEC will be impacted:

* Schedule 8 ‘GB Companion Specification’
* Schedule 9 ‘Smart Metering Equipment Technical Specifications’
* Schedule 11 ‘TS Applicability Tables’

The changes to the SEC required to deliver the proposed solution can be found in Annex A. The changes to Schedule 11 will be prepared and agreed with the TABASC as part of implementation.

## Consumers

There are no identified impacts on consumers.

## Other industry Codes

There are no identified impacts on other industry Codes.

## Greenhouse gas emissions

There are no identified impacts on greenhouse gas emissions.

# Costs

## DCC costs

There is no DCC cost in implementing this modification.

## SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to £1,200. The activities needed to be undertaken for this are:

* Updating the SEC and releasing the new version to the industry.

## SEC Party costs

There are no Party costs anticipated to implement this modification.

# Implementation approach

## Recommended implementation approach

SECAS is recommending, if approved under Self-Governance, an implementation date of:

* **5 November 2020** (November 2020 SEC Release) if a decision to approve is received on or before 22 October 2020; or
* **4 November 2021** (November 2021 SEC Release) if a decision to approve is received after 22 October 2020 but on or before 21 October 2021.

As this modification contains no DCC Systems impacting IRPs, the lead time to implement the Proposed Solution is condensed as there are changes to legal text only. As the changes impact a Technical Specification, they must be implemented in a SEC Release that includes an uplift to the Technical Specifications to prevent more than one change to the Technical Specifications in a calendar year. The November 2020 SEC Release is the earliest release this modification can be targeted for. If a decision is not received in time for the November 2020 SEC Release, it will therefore be targeted for the November 2021 SEC Release, which is when the next uplift to the Technical Specifications is expected. However, if an earlier uplift of the Technical Specifications occurs in 2021, MP098 may be able to be incorporated into the uplift at the same time.

BEIS has drafted and plan to introduce GBCS v4.0 and SMETS2 v5.0 in the November 2020 SEC Release. These changes will made against these draft documents and will be implemented as part of the same uplift; therefore, the version numbers will not change. Following advice from the TABASC and responses to the Refinement Consultation these changes will not be applied to the existing versions of SMETS2 (v4.n) and GBCS (v3.n).

# Assessment of the proposal

## Observations on the issue

The proposal was presented to the Change Sub-Committee (CSC) for initial comments and also for recommendation. CSC members were supportive of the proposal, agreed the issue was clear, and recommended that the proposal progresses straight to the Report Phase.

DP098 was also presented for initial comments to the other SEC Sub-Committees. The TABASC reviewed the IRPs included in the proposal and agreed with the IRPs removed from the initial list. It questioned how the changes would be implemented in light of the BEIS APC consultation decision.

The remaining SEC Sub-Committees were happy for the proposal to progress and provided no further comments.

**Is a GBCS v3.3 and SMETS2 v4.3 needed?**

BEIS will be implementing new APC functionality alongside the November 2020 SEC Release. This will be executed through a new Principle Version of GBCS and SMETS2 which will be GBCS v4.0 and SMETS2 v5.0. These versions of the technical specifications will contain the changes required for the APC and also a number of IRPs which relate to the sections of the documents that are being changed. IRPs that are not in sections of the documents that are being changed have not been implemented by BEIS in these versions.

DCC Users can choose to remain on the current versions of GBCS and SMETS2 or choose to move to GBCS v4.0/SMETS2 v5.0. Those who chose to move can chose to use the APC functionality or not. Those who have no wish to use the APC functionality can remain on current versions of GBCS and SMETS2 or move to GBCS v4.0/SMETS2 v5.0.

The remaining IRPs not currently included in the BEIS draft of GBCS v4.0/SMETS2 v5.0 will be implemented into GBCS v4.0 and SMETS2 v5.0 in November 2020 if this modification is approved. However, they will not be implemented into GBCS v3.2 or SMETS2 v4.2 as this would require an uplift and would create GBCS v3.3 and SMETS2 4.3 respectively.

SMETS2 v5.0 and GBCS v4.0 complement each other. Therefore, a Device on SMETS 4.n is not fully compatible with GBCS v4.0 (since GBCS v4.0 is based on SMETS v5.0).

The creation of a GBCS v3.3 and SMETS2 v4.3 was discussed at the TABASC. It stated that there should not be a GBCS v3.3 and SMETS2 v4.3 unless there was a material benefit. SECAS also contacted Device Manufacturer Trade Associations for comment. One shared the view that having two versions of the specifications would cause added confusion to industry. The other respondent stated that members are expecting to produce ESME without the APC functionality so they feel there is a need for a GBCS v3.3.

Industry Parties were asked to comment if they saw any material benefit to the production of a GBCS v3.3 and SMETS2 v4.3 as part of the Refinement Consultation. Parties were against the creation of a GBCS v3.3 and no views were received regarding creation of a SMETS2 v4.3.

## Support for Change

### Working Group

The Working Group agreed with the list of 20 IRPs included in this modification and understood the need for implementation in the November 2020 SEC Release.

The main point of discussion was in relation to the potential need of GBCS v3.3 and SMETS2 v4.3. The Working Group raised concern that having two versions of GBCS and SMETS running in conjunction with each other would cause confusion for the industry. A Working Group member stated that the APC/SAPC functionality is optional and therefore felt that there is no need for GBCS v3.3 and SMETS2 v4.3. SECAS stated that there would be other specifications that would be included in GBCS v3.3 and SMETS2 v4.3 as these versions would be used to include outstanding changes.

A member requested clarity in relation to IRP554 and IRP582, which were removed from modification [MP078 ‘Incorporation of multiple Issue Resolution Proposals into the SEC – Part 2’](https://smartenergycodecompany.co.uk/modifications/incorporation-of-multiple-issue-resolution-proposals-into-the-sec-part-2/). IRP554 has been migrated into this modification due to it now being a document-only change, whereas BEIS has withdrawn IRP582 as a result of a change to the User Case.

### Refinement Consultation responses

SECAS received two responses to the Refinement Consultation. The respondents were generally supportive of the modification and felt that it would better facilitate SEC Objective (a).

As a meter Manufacturer, one respondent believed that there is not a material benefit of implementing GBCS v3.3. They requested further clarity regarding the implementation of SMETS2 v5.0 and GBCS v4.0.

The second respondent, a Large Supplier, highlighted that although the IRPs included are document only changes, Device Manufacturers may need to implement changes to their Devices. The respondent therefore feels that if this is the case, compliant Devices will not be available until at least 12 months after MP098’s implementation. They also commented that SMETS2 v4.3 and GBCS v3.3 will only be of benefit if they will remain in effect for some time, and that compliant Devices will continue to be installed in volume. Further clarity was also requested in terms of Technical Specification versioning in conjunction with the November 2020 SEC Release.

It has since been confirmed that there will not be a SMETS2 v4.3 and GBCS v3.3.

## Proposer’s rationale against the General SEC Objectives

### Objective(a)[[1]](#footnote-1)

The Proposer believes that this modification will better facilitate SEC Objective (a) as the implementation of the IRPs will reduce the risk of future operational issues arising.

# Appendix 1: Progression timetable

This Modification was presented to Panel on 15 May 2020. The modification will be sent out for Modification Report Consultation for 15 working days. After this period the consultation responses will be published on the SECAS website. This will then be presented to the Change Board who will decide whether or not to approve this modification.

| Timetable | |
| --- | --- |
| Action | Date |
| Modification discussed with Working Group | 1 Apr 2020 |
| Refinement Consultation | 8 Apr – 1 May 2020 |
| Update Panel | 15 May 2020 |
| Modification Report Consultation | 18 May – 8 Jun 2020 |
| Change Board Vote | 24 Jun 2020 |

# 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 |
| APC | Auxiliary Proportionate Control |
| BEIS | Department for Business, Energy and Industry Strategy |
| DCC | Data Communications Company |
| GBCS | Great Britain Companion Specification |
| IRP | Issue Resolution Proposal |
| SEC | Smart Energy Code |
| SECAS | Smart Energy Code Administrator and Secretariat |
| SMETS | Smart Metering Equipment Technical Specifications |
| TABASC | Technical Architecture and Business Architecture Sub-Committee |
| TS | Technical Specification |
| TSIRS | Technical Specification Issue Resolution Sub-Group |

1. (a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers’ premises within Great Britain. [↑](#footnote-ref-1)