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MP123 'IVP realignment of SMETS2 v2.0 and v3.1'

Modification Report Version 1.0



About this document

This document is a 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.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

Contact

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

Ali Beard

020 3970 1105

Alison.beard@gemserv.com

1. Summary

This proposal has been raised by Alastair Cobb from Landis & Gyr.

The SEC sets out the Smart Metering technical specifications. To ensure interoperability the dates which these technical specifications can be used are set out within SEC Schedule 11 'Technical Specification Applicability Tables' (TSAT).

The current UK Government social distancing guidance issued to help reduce the spread of the coronavirus means only essential meter installations are taking place. There is currently no definitive end date to this guidance. This has resulted in large numbers of Smart Metering Technical Specifications 2 (SMETS2) v2.0 and v3.1 Devices being held by Suppliers (including those on order) that they will be unable to install before the approaching deadline of 27 October 2020. Device manufacturers and Suppliers may also experience delays in the supply of SMETS2 v4.2 Devices.

In addition, there has been an unforeseen delay in the development of SMETS2 v4.2 / Great Britain Companion Specification (GBCS) v3.2 Devices due to delays and potential suspension of Commercial Product Assurance (CPA) capabilities affecting a number of manufacturers during the COVID-19 social distancing guidance.

This means the Installation Validity Period (IVP) end date for these Devices as currently set out will result in both a large number of stranded or scrapped SMETS2 v2.0 and v3.1 Devices and potentially a significant interruption in the supply and installation of SMETS2 v4.2 Devices.

The solution will be to revise the Installation Validity Period (IVP) end-date for SMETS2 v2.0 and v3.1 from 27 October 2020 to 27 April 2021. This assumes a return to installation rates by 27 October 2020, to the same level as before the COVID-19 guidance.

Parties will not be directly impacted in implementing this modification, though Suppliers and Device manufacturers would benefit from the change. Implementation effort will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort, and the changes are proposed to be implemented 10 Working Days following decision.

2. Issue

What are the current arrangements?

The SEC sets out the Smart Metering technical specifications. These include SMETS and GBCS. To ensure interoperability the TSAT specify the dates Devices using these specifications can be installed and maintained. The IVP sets out the date until which these Devices can be installed, and the MVP sets out the date when they must be moved onto a newer version of the technical specifications.

What is the issue?

In March 2020 the UK Government issued social distancing guidance to help prevent the spread of the coronavirus also known as COVID-19. This resulted in only essential meter installations taking place. As a consequence, Suppliers are holding a large number of SMETS2 v2.0 and v3.1 Devices and many more are in the global supply chain with currently too short a window of time until 27 October 2020 to install them. Supply chain problems for manufacturers importing SMETS2 v4.2 Devices are also occurring.

In addition, the CPA processes are also being affected by the COVID-19 situation. There is a high probability a number of SMETS2 v4.2 Devices will not be assured in sufficient time to allow manufacture and supply by 27 October 2020. In the last quarter Suppliers have continued to procure SMETS2 v4.2 / GBCS v3.2 Devices. During this period Suppliers have continued to procure SMETS2 v2.0 and v3.1 Devices to meet their obligations.

What is the impact this is having?

The Proposer believes that the IVP end dates for SMETS2 v2.0 and v3.1 are no longer consistent with the full utilisation of existing SMETS2 v2.0 Supplier stock and a smooth 100% transition to SMETS2 v4.2 Devices. Without a realignment, this will result in a large number of scrapped SMETS2 v2.0 and v3.1 Devices and a gap in installations after the end of the IVP period for SMETS2 v2.0 and v3.1 meters because no SMETS2 v4.2 meters are available.

Additionally, the NCSC guidance around the updating of firmware has removed the capability for Device manufacturers to upgrade Device firmware unless connected to the Data Communications Company (DCC) network. Without any derogation to continue to fit these Devices they will be scrapped, causing additional unnecessary costs to the industry and an environmental impact.

3. Solution

Proposed Solution

The proposed solution is to extend the IVP end-date for SMETS2 v2.0 and SMETS2 v3.1 Devices. This will allow Device manufacturers and Suppliers to use up existing stocks of SMETS2 v2.0 and v3.1 Devices, reducing cost and wastage within the industry. The date will be extended by six months from 27 October 2020 to 27 April 2021.

4. Impacts

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties		DCC

Suppliers will have a longer time to install any SMETS2 v2.0 and SMETS2 v3.1 Devices that they have in stock and any currently in the supply chain. Meter manufacturers affected by supply chain issues will have an extended period to ensure SMETS2 v4.2 Devices are ready for rollout when the social distancing guidance ends.

DCC System

There are no impacts on DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 11 'Technical Specification Applicability Tables'

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

Consumers

Consumers may not be able to have a smart meter installed if there is a lack of supply due to the SMETS2 v4.2 Devices not being readily available. Increasing the IVP dates for SMETS2 and CHTS will allow existing stock to be used.

Other industry Codes

This modification will have no impact on any other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions but scrappage of Devices would have a detrimental environmental impact.

5. Costs

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £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 will be no cost to SEC Parties to implement this modification.

6. Implementation approach

Agreed implementation approach

The Panel agreed an implementation date of **10 Working Days following decision** (if approved under Self-Governance, this would be 10 Working Days following the end of the referral period).

The June 2020 SEC Release is currently scheduled for 25 June 2020 but has been requested to be brought forward to 6 May 2020. This means the modification is expected to miss the cut-off for inclusion. The November 2020 SEC Release would be past the IVP date for the SMETS2 versions, which is too late. An ad-hoc release is therefore recommended to ensure the changes can be implemented as soon as possible ahead of the current IVP end date.

7. Assessment of the proposal

Observations on the issue

The Change Sub-Committee (CSC) was supportive and recommended it be converted to Modification Proposal.

Support for Change

The Technical Architecture and Business Architecture Sub-Committee (TABASC) was supportive, with TABASC members representing Suppliers stating that it would be an issue for most Suppliers and Device Manufacturers as the coronavirus social distancing measures taken across the world are disrupting the supply chain. The TABASC noted that not all Device Manufacturers would be affected by the NCSC guidelines and subsequent delay experienced by the Proposer. Members therefore questioned if this issue would be best raised by a Supplier rather than a Device Manufacturer. SECAS stated that the Proposer was happy to amend the proposal to emphasise the coronavirus issues which were affecting the whole industry.

TABASC members noted that the original proposal was to change the IVP and MVP dates for SMETS2 v2.0 Devices but SMETS2 v3.1 would also be affected. They also noted that the MVP dates for both SMETS2 v2.0 and v3.1 were not populated and therefore this would not need to be changed. The Proposer agreed to add in SMETS2 v3.1 Devices and agreed that the MVP was not an issue.

When questioned on the length of time for the extension the TABASC agreed six months was acceptable.

There was a suggestion that the dates could remain unchanged and Ofgem might be lenient on Suppliers considering the situation. However, Suppliers said if the dates were not changed, they would not be compliant with the SEC and emphasised that they needed regulatory certainty.

The Security Sub-Committee (SSC) was also supportive, reiterating that the coronavirus situation was the main cause for concern over and above the NCSC delays. Members said they would prefer to continue to roll out SMETS2 v2.0 devices rather than moving to SMETS2 v4.2 Devices before they are on the Central Products List (CPL). They also noted that whilst not against the deferral of the IVP date, moving to SMETS2 v4.2 would help with standardisation of prepayment meters and should not be delayed any longer than necessary.

BEIS has been informed of the proposed changes. It has expressed support for a six-month extension to these dates in light of the impact caused by the coronavirus.

Views against the General SEC Objectives

Proposer's views

Objective (a)

The Proposer believes this Draft Proposal better facilitates SEC General Objective (a)¹, believing that this will help to better facilitate the efficient provision and installation of smart metering systems.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Industry views

Comments received from industry participants were supportive.

Panel's Conclusions

One Panel member queried if this is a single-Party issue or if all are affected, to which another responded that all manufacturers are on board. SECAS explained that during development two industry participants has suggested moving the IVP and MVP end dates for Communications Hub Technical Specifications (CHTS) but the DCC firmware delivery roadmap was not grounded enough and this would make changing the CHTS dates difficult and potentially controversial. For these reasons the Proposer had decided to remove the CHTS elements from the proposed solution.

Appendix 1: Progression timetable

This Draft Proposal was discussed at Change Sub-Committee (CSC) on 31 March 2020 where the CSC agreed it would recommend to the Panel that this be converted to a Modification Proposal. If the Panel agrees, this will go straight to the Report Phase as a Self-Governance Modification and be issued for a five Working Day Modification Report Consultation. An ad-hoc Change Board will then be convened to vote.

Timetable	
Event/Action	Date
Draft Proposal raised	30 Mar 2020
Presented to CSC for initial comment	31 Mar 2020
Modification Report approved by Panel	17 Apr 2020
Modification Report Consultation	20 Apr – 24 Apr 2020
Change Board Vote	w/c 27 Apr 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
CPA	Commercial Product Assurance
CPL	Central Products List
DCC	Data Communications Company
GBCS	Great Britain Companion Specifications
IVP	Installation Validity Period
MVP	Maintenance Validity Period
NCSC	National Cyber Security Centre
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS2	Smart Metering Technical Specifications 2
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specification Applicability Tables

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Annex A

Legal text – version 1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Schedule 11 'Technical Specification Applicability Tables'

Amend Schedule 11 as follows:

TS Applicability Tables

Rows that are depicted by a cross in each cell indicate that either the Maintenance End Date or GBCS Applicability Period End Date has been applied and energy suppliers should have taken all reasonable steps to ensure that there are no Devices operating with that combination of Technical Specification and GBCS once the end date has passed.

Table 1 SMETS1

SMETS Version	Installation Start Date	General Installation End Date	PPM Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.2	18/12/12	05/12/18	15/03/19	18/12/12	Not determined	Not applicable	Not applicable	Not applicable

Table 2 SMETS2+ and Relevant Versions of GBCS

SMETS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	Not determined	30/09/16	Not determined	1.0	30/09/16	07/05/18
2.0	30/09/16	27/10/2018	30/09/16	Not determined	1.1	06/11/17	Not determined
3.0	28/10/18	07/11/18	28/10/18	07/11/18	2.0	28/10/18	Not determined

SMETS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
3.1	08/11/18	27/1004/201	08/11/18	Not determined	2.0	28/10/18	Not determined
3.0	28/10/18	07/11/18	28/10/18	07/11/18	2.1	28/10/18	Not determined
3.1	08/11/18	27/1004/201	08/11/18	Not determined	2.1	28/10/18	Not determined
4.0	Not determined	Not determined	Not determined	Not determined	3.0	Not determined	05/06/18
4.0	Not determined	07/11/18	Not determined	07/11/18	3.1	Not determined	Not determined
4.1	Not determined	Not determined	Not determined	04/07/19	3.1	Not determined	04/07/19
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

Table 3 CHTS and Relevant Versions of GBCS

CHTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.0	30/09/16	Not determined	30/09/16	Not determined	1.0	30/09/16	07/05/18
1.0	30/09/16	31/01/21	30/09/16	28/02/21	1.1	06/11/17	Not determined
1.1	28/10/18	Not determined	28/10/18	Not determined	2.0	28/10/18	28/02/21
1.1	28/10/18	30/04/21	28/10/18	31/05/21	2.1	28/10/18	Not determined
1.2	Not determined	Not determined	Not determined	Not determined	3.0	Not determined	05/06/18
1.2	Not determined	Not determined	Not determined	Not determined	3.1	Not determined	04/07/19
1.2	07/11/19	Not determined	07/11/19	04/07/19	3.2	Not determined	Not determined
1.3	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

Table 4 GBCS and Relevant Versions of CPA Security Characteristics

GBCS Version(s)	Relevant Versions of CPA Security Characteristics
<ul style="list-style-type: none"> • 1.0 • 1.1 • 2.0 • 2.1 • 3.0 • 3.1 • 3.2 	<p>The most recent Sub-Version of Principal Version 1 of the document entitled ‘CPA Security Characteristic: Smart Metering – Communications Hub’ published on the NCSC_website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p> <p>The most recent Sub-Version of Principal Version 1 of the document entitled ‘CPA Security Characteristic: Electricity Smart Metering Equipment’ published on the NCSC website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p> <p>The most recent Sub-Version of Principal Version 1 of the document entitled ‘CPA Security Characteristic: Gas Smart Metering Equipment’ published on the NCSC website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p> <p>The most recent Sub-Version of Principal Version 1 of the document entitled ‘CPA Security Characteristic: Smart Metering – HAN Connected Auxiliary Load Control Switch’ published on the NCSC_website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p>