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# MP098 ‘Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 3’

## Refinement Consultation responses

### About this document

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This document contains the full non-confidential collated responses received to the MP098 Refinement Consultation.

## Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	It is understood that the incorporation of the IRPs into SMETS2 v5.0 and GBCS v4.0 is a logical step and agree that proliferation of specifications unnecessarily could lead to confusion. The only concern is whether if any of the IRPS would otherwise cause a lack of compliance with SMETS 2 v4.2 / GBCS 3.2 or are these simply clarification.
EDF	Large Supplier	Yes	We agree with the changes proposed, these changes have already been agreed at the Technical Specification Issue Resolution Sub-Group (TSIRS) and we have no reason to challenge that view.

## Question 2: Will there be any impact on your organisation to implement MP098?

Question 2			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	No	Assuming none of the IRPS cause a non-conformance with SMETS 2 v4.2 / GBCS 3.2 , there should not be an issue.
EDF	Large Supplier	Yes	We will need to ensure that the devices that we procure, install and maintain reflect the changes detailed to ensure they remain compliant with the Technical Specifications. The impact of these changes will depend on which version of the Technical Specifications these changes are included in.

### Question 3: Will your organisation incur any costs in implementing MP098?

Question 3			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	It is anticipated that some of the IRPS will drive some changes due to any clarifications that require firmware changes. This will also have testing and approval costs as appropriate.
EDF	Large Supplier	Yes	It is not possible to quantify the costs of these specific changes as they will be one part of a wider upgrade of devices to comply with a new version of the Technical Specifications. We do, however, expect the cost of making these changes to devices to be relatively low.

## Question 4: Do you believe that MP098 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	We would expect that the clarifications would support General SEC objective (a).
EDF	Large Supplier	Yes	We agree that MP098 will better facilitate SEC Objective (a) as it will ensure that smart metering devices will operate correctly and not be subject to the issues noted in the original Issue Resolution Proposals (IRPs).

## Question 5: Noting the costs and benefits of this modification, do you believe MP098 should be approved?

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Question 5			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	It is important that IRPs that confirm the correct behaviour to make the system work are correctly identified and communicated to avoid costs of non-functioning devices.
EDF	Large Supplier	Yes	We agree that MP098 should be approved.

## Question 6: How long from the point of approval would your organisation need to implement MP098?

Question 6			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	6 – 9 months	Since this additional to the SMETS2 v5.0 / GBCS 4.0 capability, it is expected to be introduced in line with that functionality.
EDF	Large Supplier	12 months	Any change to the Technical Specifications requires a lead time of at least 12 months to implement.

## Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	No	It is not clear from the timescale in the implementation section if SMEST2 v5.0 / GBCS 4.0 will be deferred from the November 2020 release in its entirety if this is not agreed by 22 October and is very confusing. Greater clarity is required here as it could be inferred that some of SMETS2 v5.0 will be in the November release and some in June 2021. If this doesn't get agreed by October, is the intent to postpone the SMEST2 v5.0 to the June release?
EDF	Large Supplier	No	<p>We do not agree that the lead time to implement the Proposed Solution is condensed as there are changes to legal text only. These changes to the Technical Specifications may require changes to be made to Devices to enable them to be compliant with the revised requirements – they are not just changes to the legal text.</p> <p>An implementation date of November 2020 is only reasonable if there is no expectation that Devices compliant with the revised Technical Specifications will actually be installed at this time, and if there is no requirement to do so before November 2021. While the legal text changes for the Technical Specifications might come into legal effect in the SEC in November 2020 Devices compliant with those revised specifications are highly unlikely to be able to be made available for 12 months from this date. That is the standard lead time for Device Manufacturers to be able to make these sorts of changes to align to a new version of the Technical Specifications.</p>



## Question 8: Do you agree that the legal text will deliver MP098?

Question 8			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	N/A
EDF	Large Supplier	Yes	The legal text has been agreed as part of the TSIRS review process.

## Question 9: Do you agree with implementing the legal text drafting from MP098 to the current Principal Versions of the Technical Specifications as a Sub-Version (for example 3.2 to 3.3), and as a Sub-Version to the next Principal Version (for example 3.X to 4.X)?

Question 9			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	Yes	It seems logical to include them in with other changes in this way.
EDF	Large Supplier	No	<p>While we can see there might be an argument for creating the SMETS2 v4.3 uplift and require meters, hubs and displays to implement the IRPs, there doesn't seem to be enough time for squeezing in another incremental uplift before the next major release (SMETS2 v5.0) on the current time lines proposed.</p> <p>Meter and display Manufacturers are already going to be hard pressed to deliver their SMETS2 v4.2 compliant Devices in preparation for the cutover to the installation of these Devices and the end of the Installation Validity Periods (IVPs) for previous generation Devices to be installed and commissioned.</p> <p>What is not clear is whether the new SMETS2 v5.0 will even be mandated (i.e. whether installation of SMETS2 v4.x devices would need to cease) or whether it will remain optional. BEIS has indicated that APC/SAPC functionality is intended to be optional for Suppliers to install. It is not clear whether, in the absence of these changes, both versions of the Technical Specifications (v4.2 and 5.0) would run in parallel with Suppliers able to choose</p>

Question 9			
Respondent	Category	Response	Rationale
			<p>which of the two versions they wished to install, based on the services they wish to provide to their consumers.</p> <p>It is also not clear what impact BEIS proposals around device level versioning within the Technical Specification Applicability Tables (TSATs) will have on the applicable SMETS versions for the various Devices.</p> <p>It would only be worth considering uplifting the Technical Specifications as a Sub-Version to the existing versions (i.e. creating SMETS2 v4.3 and GBCS v3.3) if it is clear that these specifications will remain in effect for some time, and that Devices compliant with these specifications will continue to be installed in volume. If it can be assured that is the case then it might make sense to make the changes in this way, to enable these Devices to benefit from the fixes included in the IRPs. In this case the IVPs and MVPs for the various versions of the Technical Specifications would need to be considered, it is not clear whether it would be necessary to end the IVPs and MVPs of the current versions to force Suppliers to upgrade or not. We would be cautious about any requirement to end an MVP as any Devices that can't be upgraded will be made non-compliant as a result.</p> <p>On the basis of the information available at the moment we believe that these changes should be included in the SMETS2 v5.0 and GBCS v4.0.</p>

## Question 10: Do you feel that there will be a material benefit from having a GBCS v3.3?

Question 10			
Respondent	Category	Response	Rationale
Landis + Gyr	Other SEC Party	No	Provided that the implementation of these IRPs does not infringe compliance with the previous versions, it is not envisaged that a GBCS 3.3 would be required.
EDF	Large Supplier	N/A	The answer to this question is very much dependent on the clarification of the issues raised in Question 9 about the timeline and implementation of SMETS2 v5.0 and GBCS v4.0.

## Question 11: Please provide any further comments you may have

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Question 9		
Respondent	Category	Comments
Landis + Gyr	Other SEC Party	N/A
EDF	Large Supplier	N/A