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# MP102A

## ‘Power Outage Alerts triggered by an OTA firmware upgrade’

### Modification Report

Version 0.4

Corporate member of  
Plain English Campaign  
Committed to clearer  
communication

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## About this document

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This document is a draft Modification Report. It currently sets out the background, issue, 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 business requirements for the solution.
- **Annex B** contains the redlined changes to the SEC required to deliver the Proposed Solution.

## Contact

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## 1. Summary

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This proposal has been raised by Matthew Alexander from Scottish and Southern Electricity Networks (SSEN).

Power Outage Alerts (POA) are used by Distribution Network Operators (DNOs) to improve customer service. They allow DNOs to become aware of power outages sooner rather than relying on the Customer to contact them. This enables DNOs to restore supply to affected customer more efficiently and more quickly.

Over the Air (OTA) firmware updates on some Electricity Smart Metering Equipment (ESMEs) generate a POA. The DNO is unable to establish whether there is a real issue with the power to the premises or whether it was just a firmware upgrade to the ESME.

OTA firmware upgrades have been required to stop this happening, however this agreement should be seen as being an interim solution until an enduring solution is implemented as a new ESME Manufacturer may be unaware or not comply with such an agreement.

Alongside this, there are still a set of ESMEs currently installed, that will continue to initiate a POA when an OTA firmware update is implemented.

Investigations during the Refinement Phase found the scale of the issue affecting existing meters much greater than initially envisaged. This could result in a lengthy lead time for implementation where meter Manufacturers could potentially still produce Devices that cause erroneous Power Outage Alerts (POAs). Therefore, it has been agreed that there should be two separate solutions to address the issue;

- MP102A - a Technical Specifications document change for meter Manufacturers to abide by for ESME produced after implementation, and
- MP102B - an enduring solution for meters that are currently installed.

There will be no impact to SEC Parties to implement this modification and no DCC System changes are required. If approved, we recommend implementation as part of the November 2020 SEC Release.

## 2. Issue

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### What are the current arrangements?

Power Outage Alerts (POA) are intended to identify when the incoming power supply from a Distribution Network Operator (DNO) to a Customer's premises fails for a period greater than three minutes. Such POAs are used by DNOs to improve customer service by becoming aware of power outages sooner than relying on the customer to phone in, and to develop a faster, more complete view of the premises affected and hence enable them to restore supply to affected customer more efficiently and more quickly.

In order to achieve this, a DNO needs to be confident that the POAs it receives are genuine and actually relate to supply interruptions to Customers' premises.

### What is the issue?

Experience has shown that implementing an Over the Air (OTA) firmware update on some Electricity Smart Metering Equipment (ESMEs) generates a POA. This is because when some ESMEs activate a new firmware version it results in an interruption of the power supply to the Communications Hub (CH) (power to the CH is supplied by the ESME). If the power supply for the CH is interrupted for more than three minutes, then the CH must send a POA (the AD1 Alert).

The Data Communications Company (DCC) then sends the AD1 Alert to the relevant DNO, who can't tell whether there is a real issue with the power to the premises or whether it was just a firmware upgrade to the ESME. As DNOs need to respond to each POA, a POA initiated by an OTA firmware update will cause a DNO to put in place systems to check every POA to understand if it relates to a genuine power outage.

Electricity Distributors have an obligation under Statutory Instrument 2002 No. 2665 'The Electricity Safety, Quality and Continuity Regulations 2002 (as amended)' to have and use distribution equipment in such a way so as to prevent interruption of supply to Customers' premises, so far as is reasonably practicable. Hence there is a legal obligation to maintain supplies to Customers.

Electricity Distributors have an obligation under Statutory Instrument 20015 No. 699 'The Electricity (Standards of Performance) Regulations' to pay Customers a prescribed sum of money where the supply to a Customer's premise is interrupted as a result of a fault on their network which is not restored in a prescribed period of time. There is therefore a need for the Electricity Distributors to know when a Consumer's supply is interrupted so that they can respond appropriately. Failure to respond and restore supplies within the prescribed time will have an adverse impact on Customer service and create an obligation to pay customers compensation.

Depending on the location of the faulty equipment, Electricity Distributors have a number of means of detecting the interruption of supplies to a customer's premise, the AD1 Alert being one of them. At the moment under the RIIO-ED1 regulatory instructions and guidance (RIGs) Annex F 'Interruptions', published by Ofgem and which forms part of the Electricity Distributors licence obligations, the Electricity Distributor need not respond on receipt of a single AD1 Alert, but there is a clear expectation that when the AD1 Alerts become more reliable the RIGs will be changed accordingly. It is therefore essential that the AD1 Alerts are as reliable as possible; when the RIGs are changed, Electricity Distributors will need to respond to an AD1 Alert. False or spurious AD1 Alerts are likely to initiate an unnecessary Customer contact either by phone or a site visit, which will increase costs, ultimately borne by Customers, and have an adverse impact on Customer service.

This issue was previously highlighted in industry forums and resolved by current ESME Manufacturers agreeing that all future OTA firmware updates would be designed so as not to initiate a POA event (the ESME must not cut the CH power supply for three or more minutes during a firmware upgrade to prevent the CH from sending the AD1).

OTA firmware upgrades have been required to implement this change – however this agreement should be seen as an interim solution until an enduring obligation is implemented as new ESME Manufacturer may be unaware or not comply with such an agreement.

Alongside this, there are still a set of ESMEs, that will continue to initiate a POA when an OTA firmware update is implemented. This issue relates to the ESMEs already and is being investigated under [MP102B 'Power Outage Alerts triggered by an OTA firmware upgrade – enduring solution'](#). Ultimately these ESMEs would need to be replaced to resolve the problem. During this time, there is currently no solution that can stop POAs from being forwarded to the relevant DNO unnecessarily.

In summary there are two issues:

1. There is no obligation in the Smart Energy Code (SEC) to require an OTA firmware update not to generate a POA.
2. There is no means of identifying or suppressing erroneous POAs associated with an OTA firmware update from the high number of ESMEs in service where this issue can't be addressed.

### How does this issue relate to the SEC?

The Proposer has stated that there will need to be amendments to the Smart Metering Equipment Technical Specifications (SMETS) (SEC Schedule 9) and the GB Companion Specification (GBCS), (SEC Schedule 8). At the moment there is no specific text in the Device specifications (SMETS or GBCS) prohibiting a POA from being issued during an OTA firmware upgrade. Nor is there a mechanism to suppress POAs from being generated incorrectly when an OTA firmware update is processed by a device that cannot be modified to inhibit their creation.

### What is the impact this is having?

As DNOs need to respond to each POA, the issue of a POA initiated by an OTA upgrade will require a DNO to put in place systems to check every POA to establish if it relates to a genuine power outage. This could require the DNO to develop and implement systems that would automatically check the energisation status of each meter from which POA is received to confirm that the POA is genuine, or in the worst case, send a member of staff to site to investigate the reported POA.

### What is the impact of doing nothing?

There are two significant impacts if this issue is not addressed:

- DNOs will either need to check the energisation status of each meter from which POA is received, or
- DNOs will need to send a member of staff to site to investigate.

Both these options will result in the DNO incurring additional costs.

### 3. Solution

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#### Proposed Solution

The Proposed solution for this modification is to amend sections of SEC Schedule 9 'Smart Metering Equipment Technical Specifications 2'. Amendments will be made to sections 4.3, 5.4, 5.10 and 5.16. this will ensure that the obligations are applied to single phase ESME, twin element single phase ESME, poly-phase ESME and Gas Smart Metering Equipment (GSME). The document changes will state that under no circumstances will a smart meter cut the power to a CH for more than three minutes when an OTA firmware upgrade takes place. Once implemented, meter Manufacturers will have to produce Devices that are compliant with the Technical Specifications and will therefore resolve the issue going forwards. The issue surrounding meters that are currently installed will be investigated under [MP102B 'Power Outage Alerts triggered by an OTA firmware upgrade – enduring solution'](#). SECAS have developed the business requirements with the Proposer and can be found in Annex A.

## 4. 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 modification will impact meter Manufacturers (Other SEC Parties) as they will have to produce ESME and GSME that are compliant with the Technical Specifications. The modification will also impact Electricity and Gas Network Parties as the solution will reduce the risk of receiving erroneous POAs from new Devices.

### DCC System

This modification will have no impact on DCC Systems.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 9 'Smart Metering Equipment Technical Specifications 2'

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

### Consumers

This modification will ensure DNOs are aware when there is a genuine Power Outage and enable consumers to be reconnected quickly. It will also ensure the DNOs do not have to visit consumers properties to check supply is on.

### Other industry Codes

This modification will have no impact on other industry Codes.

### Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

## 5. Costs

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### DCC costs

There are no DCC System 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.



## 6. Implementation approach

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### Recommended implementation approach

SECAS is recommending 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
- **25 February 2021** (February 2021 SEC Release) if a decision to approve is received after 22 October 2020 but on or before 11 February 2021.

The earliest Release this modification could be implemented in is November 2020. This modification does not have any DCC System impacts so if a decision is received after the cut off date, it could be implemented in the February 2021 SEC Release.

## 7. Assessment of the proposal

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### Observations on the issue

The proposal was presented to the Change Sub-Committee (CSC) for decision on 2 January 2020. The CSC discussed the issue and a DNO representative stated that the issue only relates to SMETS2 Devices and is limited to two manufacturers. The CSC agreed that the issue is clearly defined and recommended that the Draft Proposal should be converted into a Modification Proposal.

Once in the Refinement Process, discussions commenced between the Proposer, SECAS and the DCC regarding the number of meters affected by this issue. SECAS have advised that the DCC should undertake research for transparency of the issue. This research will allow the DCC to identify which meter models will cause the CH to reboot for a duration in excess of three minutes. The DCC have confirmed that this will have to be investigated under the request of the Preliminary Assessment.

SECAS have engaged with meter manufacturers in order to understand the magnitude of the issue. The meter manufacturer Landis and Gyr have stated that approximately 1,400,000 of their meters are affected by this issue.

Landis and Gyr also informed SECAS that they are undertaking a project to list all Global Unique Identifiers (GUIDs) of affected meters. Checking this list against their meter list, the industry will be able to establish where an OTA firmware upgrade will generate false AD1 Alerts.

### Solution development

It was suggested by the Working Group that the two different issues identified required two different and separate solutions. Due to the anticipated lengthy lead times of a solution that would address meters that are currently installed. The Proposer agreed that there should be two separate modifications. It was agreed that this modification (MP102A) should be a Technical Specifications document change that meter Manufacturers will abide by. Once implemented, this will prevent meter Manufacturers from producing Smart Metering Equipment (SME) that cut the power to the CH for more than three minutes when a OTA firmware upgrade takes place.

### Support for Change

#### Working Group

The modification was taken to the SEC Working Group to discuss the scale of the issue and to further develop the business requirements that will be used as a framework for a DCC Preliminary Assessment. A Working Group member commented that the initial estimate of 500,000 affected ESMEs was a substantial under-estimate. SECAS informed the Working Group of discussions held with meter manufacturer Landis & Gyr, who are currently running their own project to understand the scale of the issue. They claim that so far they have identified 1.4 million ESMEs affected by the issue.

MP102A was discussed at the following Working Group where one Working Group member suggested that in some cases the AD1 Alert was generated after 20-30 seconds of the power outage and send to the Service Provider and held before being passed on. They were concerned that the draft legal text was not explicit enough to account for this. The legal text has been updated to account for this.

## Views against the General SEC Objectives

### Proposer's views

The Proposer feels this is an issue that needs to be resolved.

### Industry views

Industry agree that this is an issue that needs to be resolved. After being discussed at industry forums, an agreement was put in place between meter Manufacturers to mitigate the issue for new Devices. This however is not codified in the SEC, which could lead to issues relating to new meter Manufacturers.

## Appendix 1: Progression timetable

Following the Refinement Consultation this proposal will be presented to Panel to proceed to the Report Phase.

Timetable	
Event/Action	Date
Draft Proposal raised	18 Dec 2019
Presented to CSC for comment and recommendations	2 Jan 2020
Panel converts Draft Proposal to Modification Proposal	17 Jan 2020
Business requirements developed with Proposer and DCC	Mar 2020
Modification discussed with Working Group	1 Apr 2020
Legal text developed with Proposer	Apr 2020
Legal text discussed with Working Group	6 May 2020
Refinement Consultation	11 May 2020 – 1 Jun 2020
Modification Report presented to Panel	19 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
CH	Communications Hub
CSC	Change Sub-Committee
DCC	Data Communications Company
DNO	Distribution Network Operator
ESME	Electricity Smart Metering Equipment
GBCS	Great Britain Companion Specification
GUID	Global Unique Identifier
OTA	Over The Air
POA	Power Outage Alert
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Technical Specifications