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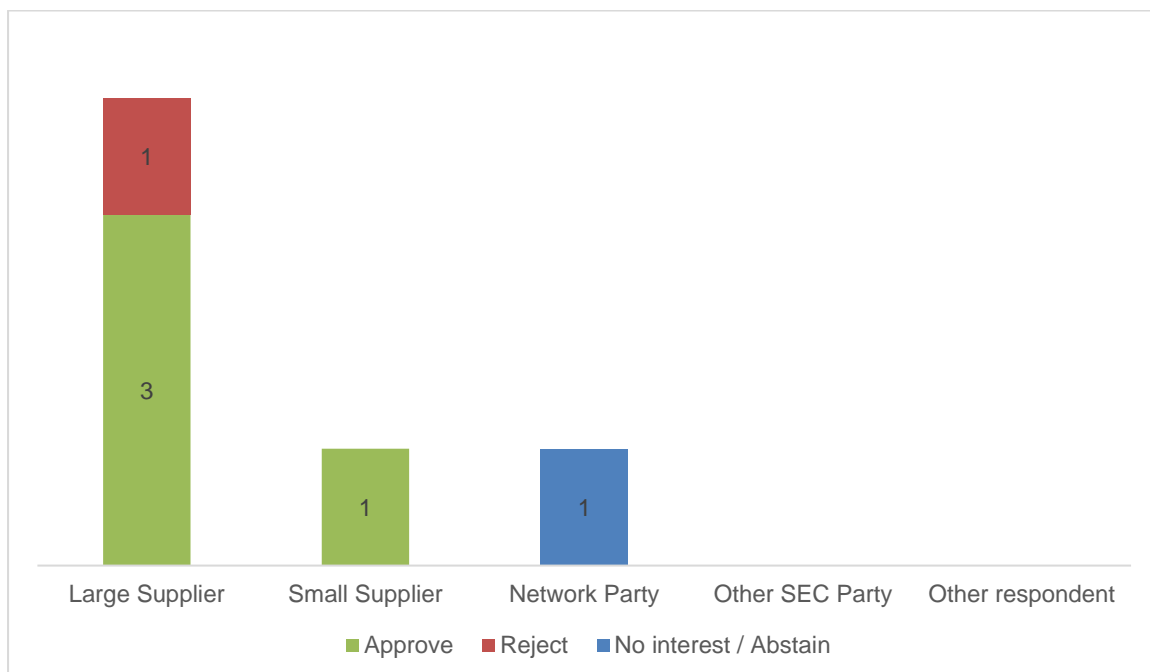
SECMP0007 ‘Firmware updates to IHDs and PPMIDs’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the SECMP0007 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that SECMP0007 should be approved?

Question 1			
Respondent	Category	Response	Rationale
BlueGreen Energy Services Limited	Small Supplier	Approve	No objections to the proposed improvement
E.ON Energy Solutions Ltd	Large Supplier	Approve	<p>The SEC Mod should be approved on account of the following business justifications:</p> <ol style="list-style-type: none"> 1. Security impacts – the ability to deploy fixes to potential security threats 2. Operational Impacts – reduced number of site visits required 3. Compatibility & Interoperability, e.g. Alert Storm rectification. 4. Customer Impacts – better customer journey 5. Innovation / Additional functionality 6. Perception of quality of the Smart Meter program of work
OVO Energy	Large Supplier	Approve	At this point, ANY solution that allows for greater ability to upgrade devices is welcomed and appreciated. The additional alerts being proposed are long overdue and will greatly assist us in ensuring our devices are upgraded accordingly.
Utilita	Large Supplier	Approve	<p>Utilita agrees that the implementation of SECMP0007 will better facilitate SEC objectives (a) and (c).</p> <p>PPMID OTA firmware updates are essential for offering an efficient SMETS2 solution.</p> <p>There are three main reasons for PPMID Firmware updates: new features; advancements including security; and fixing issues. Without the ability to complete OTA upgrades PPMIDs risk getting outdated and/or requiring replacing, incurring cost to the suppliers and ultimately the consumers.</p>

Question 1			
Respondent	Category	Response	Rationale
			However, it is important to note that this feature has been available for SMETS1 meters therefore should have been included in the scope for SMETS2 meters
Scottish Power Energy Retail Limited	Large Supplier	Reject	<p>While we agree that functionality to upgrade the firmware on a PPMID might, on occasion, be useful, the £21m + cost to implement is prohibitively high. In light of these costs we think it would probably be more cost efficient to either upgrade the firmware on the Communications Hub or replace the PPMID as required.</p> <p>It is also unclear from the business case how these costs may be divided between: (i) ESME / GSME OTA functionality as the primary beneficiary (and is therefore marginal to PPMID OTA); and (ii) an assumed high frequency of PPMID firmware updates. Absent any evidence on which to base an assumption that PPMID firmware updates will be at all frequent, there is a possibility that the latter has needlessly pushed the costs of this change upwards.</p>
Western Power Distribution	Network Party	Abstain	-

Question 2: Please provide any further comments you may have

Question 2		
Respondent	Category	Comments
BlueGreen Energy Services Limited	Small Supplier	n/a
E.ON Energy Solutions Ltd	Large Supplier	<p>EON is concerned that the costs are high:</p> <ol style="list-style-type: none"> 1. We believe that the CSPs may have included infrastructure upgrade costs to ameliorate existing general network load issues. 2. We believe that the calculations for the load on the network due to SEC Mod 007 is also high (i.e. the quotation is for the very worst possible case scenario). The SECAS RFI requesting volumetric information from Suppliers may have shown some insight into the expected load and hence will hopefully reduce the final cost of the SEC Mod implementation.
OVO Energy	Large Supplier	Not at this time.
Utilita	Large Supplier	-
Scottish Power Energy Retail Limited	Large Supplier	-
Western Power Distribution	Network Party	<p>Whilst we understand the need and intent for this modification, we are still unclear as to whether the benefits outweigh the costs.</p> <p>The DCC costs have increased substantially from the PIA (£12.3m) to the FIA (£20.8m). Whilst we appreciate that this is due to the inclusion of SIT, UIT, TTO and App. Support, it is unclear whether the Working Group has discussed this significant increase in value and still feel that the benefits outweigh these revised costs.</p>

Question 2		
Respondent	Category	Comments
		As a Network Operator we are not responsible for the maintenance of PPMIDs and HCALCs and as a result we are reliant on information provided by other parties to fully understand the benefits that can be realised from The proposed solution and unfortunately we do not feel that the Modification Report Consultation contains enough information for us to come to a conclusion.