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# DP136 'Enduring ICHIS Compliance Related to RF'

## Modification Report

Version 0.2

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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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## Contact

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

**Emmanuel Ajayi**

020 8132 4134

[emmanuel.ajayi@gemserv.com](mailto:emmanuel.ajayi@gemserv.com)

## 1. Summary

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This proposal has been raised by Tom Woolley from SMS PLC.

The Data Communication Company's (DCC's) derogation period for Intimate Communications Hub Interface Specification (ICHIS) Radio Frequency (RF) levels ended in March 2020. A number of electricity meters remain in the supply chain but not installed that are no longer compliant following the end of the derogation, which would make them unusable.

The Proposer believes that the SEC is in the process of supporting innovative changes to allow the re-use of meters. They feel there are also multiple scenarios where a meter, once compliant, should be able to be re-deployed.

The Proposer believes the wider impacts would lead to inefficiency across the supply chain of reported meters installed negative cost-benefit impact on Parties with a large number of meters that have become non-compliant.

## 2. Issue

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### What are the current arrangements?

The ICHIS refers to common interface between Communications Hubs and Smart Meters. The DCC reviews the ICHIS annually to ensure it is fit for purpose and implementation. Removing RF noise experienced by Communications Hubs to increase efficiency is a factor in ensuring meters are fit for purpose.

Meters can produce RF noise which can reach a point where the signal degrades from the host to the Communications Hub. In the winter of 2018, the DCC confirmed that it would make amendments to the ICHIS that temporarily adjusted the RF limits applicable to meters at a range of different frequencies in certain regions. This resulted in a period of derogation up to and including 30 September 2019<sup>1</sup>, during which Suppliers would be permitted to continue to install meters which were outside of the limits set in Part F of the ICHIS. The derogation period was then extended to December 2019, and eventually concluded in March 2020.

### What is the issue?

The Proposer believes that there is a relatively small stock of meters that are non-compliant now that the derogation period has ended, but which are still usable within the derogation criteria. Furthermore, where a meter was previously installed under these conditions, if it is removed it could be re-installed, where possible and in line with WAN Coverage.

However, due to the derogation period ending and the criteria of the derogation (namely that the derogation is set at installation date rather than procurement date) these installs would be non-compliant. The Proposer believes any such meters left in vans and warehouses or removed from premises could now be re-deployed.

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<sup>1</sup> [DCC Changes to ICHIS consultation](#)

The Proposer believes there are multiple scenarios where a meter, once compliant should be able to be re-deployed, including:

- obsolete stock in a Meter Operator's supply chain
- repatriated or re-usable meters
- recyclable or re-usable meters (as a result of industry change to allow so)

### What is the impact this is having?

The Proposer believes the ICHIS's permitted RF levels should create flexibility to consider derogated levels (as per WAN Coverage) of already manufactured meters. Not having this flexibility would have negative impacts by increasing meter scrappage and therefore costs and environmental inefficiency.

Furthermore, the Proposer believes the impacts would be increased due to unnecessary installations, adding further negative environmental impacts and inefficiency. This is because Suppliers are obliged to install Smart Metering Equipment Technical Specifications (SMETS) 2 Complaint Meters for them to be counted towards roll out; therefore, meters installed by Suppliers would now not be regarded as SMETS compliant and therefore would not contribute to the smart meter rollout. Being able to re-use non-compliant meters would create a higher level of environmental efficiency and cost benefit.

## 3. Assessment of the proposal

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### Observations on the issue

Change Sub-Committee (CSC) members felt this issue had already been discussed with the Suppliers and the DCC, in which discussions appeared to have reached a satisfactory conclusion. The DCC had recently dealt directly with three Suppliers impacted by this issue, and CSC members felt the Proposer should discuss the issue directly with the DCC.

Since the ICHIS is not part of the SEC, amendments cannot be made by a SEC Modification. CSC members were not convinced on the necessity of a Modification Proposal and sought further clarity on how a SEC Modification would resolve the issue.

In light of these discussions and further investigation, SECAS is currently recommending that this Draft Proposal is not taken forward as a Modification Proposal due to the fact that the issue cannot be resolved by a change to the SEC. In addition, the CSC members are content that risks presented by the issue could be mitigated by the discussions taking place with Suppliers. The Proposer has been invited to discuss this issue further with the CSC before it makes its final recommendations.

## Appendix 1: Progression timetable

The recommended approach for this Draft Proposal is to be presented to the Change Sub-Committee with SECAS recommending the CSC advise the Proposer to not take this Draft Proposal forward as a Modification Proposal.

Timetable	
Action	Date
Draft Proposal raised	14 Jul 2020
Presented to CSC for initial comment	28 Jul 2020
Input sought from Sub-Committees and Parties	Jul – Aug 2020
Presented to CSC for final comment and recommendations	29 Sep 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
ICH	Intimate Communications Hub
ICHIS	Intimate Communications Hub Interface Specifications
RF	Radio Frequency
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specification