

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

SECMP0007 ‘Firmware updates to IHDs and PPMIDs’

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to recommend **approval** of SECMP0007. It believed the modification did better facilitate SEC Objectives (a)¹, (c)², (d)³ and (f)⁴. However, some members believed only a subset of these SEC Objectives would be better facilitated rather than all four listed by the Proposer.

Modification Report Consultation

Six responses were received to the Modification Report Consultation. Four believed the modification should be approved. Of the four that believed the modification should be approved, one believed the modification better facilitated Smart Energy Code (SEC) Objectives (a) and (c). The other three did not give a view against the SEC Objectives but provided various views as to why the modification should be approved, which are summarised below.

One respondent believed the modification should be rejected. They did not give a view against the SEC Objectives but felt the modification did not have a justifiable business case.

One Network Party abstained from giving a view as to whether they thought the modification should be approved or rejected. Its views are summarised below.

¹ To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers’ premises within Great Britain.

² To facilitate Energy Consumers’ management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

⁴ To ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Managed by

Modification Report Consultation responses

Summary of responses

Respondents in favour of approval

Four Supplier Parties believed the modification should be approved. One these respondents advised that it should be approved due to the following benefits:

- Security impacts – the ability to deploy fixes to potential security threats
- Operational Impacts – reduced number of site visits required
- Compatibility & Interoperability, e.g. Alert Storm rectification.
- Customer Impacts – better customer journey
- Innovation / additional functionality
- Perception of quality of the Smart Meter program of work

However, this respondent did note concern with the high costs of the modification.

Another respondent stated that this modification will make it easier to give Prepayment Meter Interface Devices (PPMIDs) new features, address security threats and fix issues remotely. They added that the lack of Over-The-Air (OTA) capability would increase the risk of PPMIDs becoming outdated, potentially needing replacing and incurring cost on Suppliers and ultimately consumers.

Another respondent noted that the additional Alerts proposed by this modification will provide additional assistance for Suppliers updating and managing their Devices.

Respondents in favour of rejection

One Supplier Party believed this modification should be rejected. It agreed OTA capability for PPMIDs would be useful. However, it thought the implementation costs were too high to provide a business case. It also felt a portion of this costs had been assigned to overestimated volumes OTA PPMID updates resulting from this modification.

It believed it would be more cost efficient to either upgrade the firmware on the Communications Hub or replace the PPMID as required.

Abstained Respondents in favour of rejection

One Network Party abstained from providing a view as to whether this modification should be approved or not.

It acknowledged the need for this modification but was unsure whether the benefits outweighed the costs. It noted the increase in costs from the DCC's Preliminary Assessment to its Impact Assessment and queried whether the Working Group had scrutinised these and reached a conclusion on the business case. SECAS confirms the Working Group had reviewed the final costs and business case before the Modification Report was presented to the Panel.

Change Board vote

Change Board vote

The Change Board voted to recommend SECMP0007 be **approved** by the Authority.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	5	1	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	1	0	2	Approve
Other SEC Parties	3	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

Two Network Party members opted to abstain from voting on this modification. Both members supported the intent of this modification and noted its importance but believed the costs were too high and the benefits case against these unclear. Taking this into account they felt they could not form an opinion on the modification.

Views against the General SEC Objectives

Objective (a)

The majority of the Change Board believes that SECMP0007 will better facilitate SEC Objective (a) by providing for a fit for purpose, efficient and effective process for updating firmware for PPMIDs and Home Area Network (HAN) Connected Auxiliary Load Control Switches (HCALCSs). It would additionally allow Energy Suppliers to avoid unnecessary costs relating to replacement of Devices and site visits thus helping to ensuring the sustainability of Devices for the longer term.

Objective (c)

The Change Board believes that SECMP0007 will better facilitate SEC Objective (c) by allowing consumers to better manage their energy usage by ensuring they have sustainable and the most-up-to-date Devices providing them with energy related information.

Objective (d)

Six members of the Change Board believe that SECMP0007 will better facilitate SEC Objective (d) by allowing Suppliers to use a fit for purpose, consistent process for updating firmware on PPMIDs and HCALCSs. The remaining members felt this change would be neutral against this Objective.

Objective (f)

Five members of the Change Board believe that SECMP0007 will better facilitate SEC Objective (f) by using OTA firmware updates to mitigate any potential security vulnerabilities on PPMIDs or HCALCSs. The remaining members felt this change would be neutral against this Objective

Change Board discussions

One member asked whether there are any Devices already in the field that could make use of SECMP0007 or if they would need to be replaced. SECAS confirmed that the larger manufacturers had already begun building Devices with the SECMP0007 requirements factored in.

Quantifying the business case

Members noted that it is very hard to quantify the business case for this modification as it is mitigating the risk of replacing thousands or potentially millions of PPMIDs and/or HCALCSs. They noted if this were to transpire, the business case would easily be justified, but it is very difficult to provide a cost on the impact of this risk due to not knowing what may happen in the future. Members noted that the costs of replacing PPMIDs or HCALCSs would quickly stack up and felt if this was to happen this would exceed the implementation costs of this change.

One member was concerned that without this change, Devices could be left stranded in the field. Another member highlighted that this issue has existed since the SMIP went live and should have been fixed prior to go-live. A further member noted that implementing SECMP0007 would reduce costs for other modifications, in particular [MP122B 'Operational Metrics – Part 2'](#).

The Consumer Representative highlighted the benefits of this modification is felt by more than just SEC Parties. They advised this modification is key to facilitating continual positive consumer engagement in the Smart Meter Implementation Programme (SMIP) over time by not having to replace Devices if they can't be upgraded remotely.

Concerns over high costs

The Change Board unanimously expressed its concerns over the high implementation costs for this modification and some members felt they needed more scrutiny. However, most members considered they had enough information on the costs as they stood when casting their vote to be able to provide an informed opinion on the merits of the change.

One member voted to reject this modification as they could not justify the business case. They added their concern that the modification's long-term requirement is based on unknowns.