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MP105 ‘Sending SR11.2 to Devices in Suspended State’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP105 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (a). The Proposed Solution will enable Service User to recover their Devices when they are wrongfully 'Suspended' and bring them back into an operation state
Western Power Distribution	Network Party	Yes	We agree that the solution proposed is the best solution to address the issue that has been highlighted.
Utilita	Large Supplier	Yes	Utilita supports the proposed solution and believes MP105 delivers the following benefits: <ul style="list-style-type: none"> – Increased efficiency in comparison to current workaround - there is potential that Firmware updates to devices have been successful, but no response has been received by DSP. On these occasions, having the ability to send SR 11.2 to a device that is in a 'suspended' state to update the status on the Smart Metering Inventory (SMI) is more logical. – Allowing SR 11.2 to be sent and subsequently update the SMI will eradicate the time delay of the current workaround. – Improves the overall accuracy of the SMI.
E.ON Energy Solutions Limited	Large Supplier	Yes	This proposal is sensible. Energy Suppliers need to be able to read the active / current firmware version on a meter in the 'suspended' state in order to determine the firmware upgrade path to make the meter SEC compliant, in addition to using this SR to update SMI.
EDF	Large Supplier	Yes	We agree with the proposed solution.
British Gas	Large Supplier	Yes	The ability send an SR 11.2 appears to be a sensible solution to allow suppliers to ascertain the current firmware version on a suspended device. This would be of particular use in the

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Question 1			
Respondent	Category	Response	Rationale
			scenario where firmware has been activated but the successful notification has not been sent / received and the device has remained as 'suspended' due to the mismatch in firmware version with that recorded in the SMI.
OVO	Large Supplier	Yes	The omission in the solution design to enable the SRVs to be processed is an error and needs to be addressed. We have not had any industry wide issues facing us in relation to managing suspended devices but, in case this does happen, we should have all the SRVs in place to do so. The solution proposed addressed that.
Scottish Power Energy Retail Limited	Large Supplier	Yes	We agree with the proposer that, if implemented, MP105 will better facilitate Objective (a).

Question 2: Will there be any impact on your organisation to implement MP105?

Question 2			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No	-
Western Power Distribution	Network Party	No	-
Utilita	Large Supplier	-	-
E.ON Energy Solutions Limited	Large Supplier	No	-
EDF	Large Supplier	Yes	<p>We do not always get a success response after sending SR 11.3, and sending SR 11.2 to check whether the firmware on the device has been updated is part of our BAU processes. This change should reduce the number of unnecessary firmware upgrades we send to devices that have been upgraded but that information has not been updated in the Smart Metering Inventory.</p> <p>We assume that this change would be implemented as part of a new version of DUIS, the main impact will be upgrading our systems to that new version of DUIS as and when we do so. We would welcome clarity as to whether this change will only be made in a new version of DUIS or whether this new behaviour might also be made available in other current versions. As the solution would involve sending an existing alert it we would hope it would be possible to extend the benefits of this change to all current DUIS versions.</p>
British Gas	Large Supplier	No	SR 11.2 is an existing SR so there is no implementation effort for suppliers. If we choose to use this SR for suspended devices, we would need to adjust our processes, however, this

Question 2			
Respondent	Category	Response	Rationale
			would be minimal effort. There is no impact on suppliers that choose not to use SR 11.2 for suspended devices.
OVO	Large Supplier	No	Other than being able to manage our devices adequately in the case of a suspension, any impact created by this Mod will be positive and beneficial to us.
Scottish Power Energy Retail Limited	Large Supplier	Yes	We note that the DCC's costs to implement are suggested as being somewhere between £0 and £150k. The impact on us is effectively limited to our market share of these costs.

Question 3: Will your organisation incur any costs in implementing MP105?

Question 3			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	No	-
Western Power Distribution	Network Party	No	-
Utilita	Large Supplier	-	-
E.ON Energy Solutions Limited	Large Supplier	No	SR11.2 & SR11.2 are service requests already supported and in use. Minimal costs are foreseen to test this change, provided this small change is delivered as part of a larger release as is planned for November 2021.
EDF	Large Supplier	Yes	<p>If this change is implemented as part of a new version of DUIS we will incur the costs of upgrading to that new version of DUIS – it is not possible to separate the impact of this change out from the overall cost of that DUIS upgrade. We would expect the cost of this specific change to be minimal as there are no changes to the SRs that we currently send, and no process changes would be required.</p> <p>It is hard to estimate the level of benefit as this would depend on the number of suspended devices that might exist where the Smart Metering Inventory is not updated correctly following a firmware upgrade. The incremental cost of sending one firmware upgrade is very low.</p>
British Gas	Large Supplier	No	There is no associated implementation effort and hence no costs.

Question 3			
Respondent	Category	Response	Rationale
OVO	Large Supplier	Yes	All changes made by the DCC impact us in our overall costs. We will not incur any direct costs in needing to change our solution though as we can already transmit the SRV's in question, the DCC will just reject them without these changes being in place.
Scottish Power Energy Retail Limited	Large Supplier	No	-

Question 4: Do you believe that MP105 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (a). The Proposed Solution will enable Service User to recover their Devices when they are wrongfully 'Suspended' and bring them back into an operation state
Western Power Distribution	Network Party	Yes	We believe that this modification better facilitates SEC Objective (a) by ensuring that Smart Metering Systems at Consumers' premises are not wrongfully 'Suspended' on a successful firmware update.
Utilita	Large Supplier	Yes	Better facilitates SEC objective (a) as the improvements would allow users to bring devices wrongfully in a 'suspended' state into operation faster than current processes - this will provide better efficient provisions and enhance the operation of Smart Metering Systems.
E.ON Energy Solutions Limited	Large Supplier	Yes	It could be argued that SR11.2 should have been classed as an exception to the non-critical service request permitted for communicating with suspended devices in the original DUIS v1 specification.
EDF	Large Supplier	Yes	We agree that MP105 will better facilitate SEC Objective (a) as it will enable Service Users to be able to 'unsuspend' their Devices when they are operating on a valid version of firmware without sending additional upgrades unnecessarily.
British Gas	Large Supplier	Yes	We believe implementation would better facilitate general SEC Objective (a) to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. This would be achieved by allowing suppliers improved processes and ability to manage suspended devices and return them to an operational state.

Question 4			
Respondent	Category	Response	Rationale
OVO	Large Supplier	Yes	Yes, we agree with the rationale presented in the Modification Report for SEC Objective (a).
Scottish Power Energy Retail Limited	Large Supplier	Yes	We agree with the proposer that, if implemented, MP105 will better facilitate Objective (a).

Question 5: Noting the costs and benefits of this modification, do you believe MP105 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	-
Western Power Distribution	Network Party	Yes	-
Utilita	Large Supplier	Yes	The benefits (outlined in Question 1) of the modification outweigh the associated costs.
E.ON Energy Solutions Limited	Large Supplier	Yes	Energy Suppliers need to be able to read the active / current firmware version on a meter in the 'suspended' state in order to determine the firmware upgrade path to make the meter SEC compliant, in addition to using this SR to update SMI.
EDF	Large Supplier	Yes	-
British Gas	Large Supplier	Yes	Estimated implementation costs are "low" and our outweighed by the benefits to suppliers.
OVO	Large Supplier	Yes	We agree this should be approved as the costs of having to manage this outside the proposed solution far outweigh the costs stated.
Scottish Power Energy Retail Limited	Large Supplier	Yes	We agree with the proposer that, if implemented, MP105 will better facilitate Objective (a).

Question 6: How long from the point of approval would your organisation need to implement MP105?

Question 6			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	-	-
Western Power Distribution	Network Party	N/A	We do not have any additional changes to make and therefore do not require any lead time.
Utilita	Large Supplier	-	It is noted within the MOD report a lead time of 3 months with proposed implementation of release to be November 2021, this would provide Utilita with enough time to make the necessary changes.
E.ON Energy Solutions Limited	Large Supplier	3 months	No changes are foreseen in our backend systems to accommodate the change. The change will be tested as part of the larger release intended e.g. November 2021.
EDF	Large Supplier	6 months	A lead time of at least 6 months is required to enable any changes to be included in a new version of DUIS.
British Gas	Large Supplier	We do not require any implementation lead time.	No implementation effort.
OVO	Large Supplier	ASAP	We can already transmit the SRVs in question, so no changes are needed to our solution.

Question 6			
Respondent	Category	Response	Rationale
Scottish Power Energy Retail Limited	Large Supplier	N/A	We should not require any specific lead time, but would support the working group's recommendation that the Modification be incorporated in the November 2021 Release.

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

Question 7			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	-
Western Power Distribution	Network Party	Yes	We agree that this modification should be implemented in the next available SEC Release that updates the DUIS. We cannot see any need for an adhoc release earlier than this.
Utilita	Large Supplier	Yes	Utilita agrees with the implementation approach.
E.ON Energy Solutions Limited	Large Supplier	Yes	E.ON would encourage the change to be delivered as soon as possible.
EDF	Large Supplier	Yes	We agree that this change should be included in the November 2021 SEC Release.
British Gas	Large Supplier	Yes	The implementation approach appears sensible given the impact on DCC systems.
OVO	Large Supplier	Yes	We agree with the proposed approach as set out.
Scottish Power Energy Retail Limited	Large Supplier	Yes	-

Question 8: Do you agree that the legal text will deliver MP105?

Question 8			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	-	-
Western Power Distribution	Network Party	Yes	-
Utilita	Large Supplier	Yes	-
E.ON Energy Solutions Limited	Large Supplier	Yes	-
EDF	Large Supplier	No	<p>The legal text changes do not reflect the solution as detailed in section 3 of the report. Section 3 states that:</p> <p>“If the Response to SR 11.2 from a ‘Suspended’ Device indicates that a new firmware has been activated, then the Device needs to be “unsuspended”; this is done by updating the status in SMI to the status it held immediately prior to its suspension. DCC Alert N29 ‘Device Restored from Suspension’ will also be sent to the Responsible Import Supplier and to the Responsible Network Operator. This behaviour is the same as that of processing the Response to SR 11.3 ‘Activate Firmware’ from a ‘Suspended’ Device.”</p> <p>However the changes made to section 3.8.120.4 of the DUIS in the legal text only relate to SR 11.3 (Activate Firmware). Changes also need to be made to the relevant section for SR 11.2 (so section 3.8.119.4 of DUIS) to make it clear that if the response to SR 11.2 updates</p>

Question 8			
Respondent	Category	Response	Rationale
			the Smart Metering Inventory and the status of the device is Suspended, that the DCC Systems shall update the Device Status and that a DCC Alert N29 will be sent to the Responsible Supplier and to the Electricity Distributor or Gas Transporter. Similar text to that shown for section 3.8.120.4 should be included in section 3.8.119.4
British Gas	Large Supplier	Yes	The legal text implements the intent of the modification proposal
OVO	Large Supplier	Yes	The legal text aligned to the proposed change.
Scottish Power Energy Retail Limited	Large Supplier	Yes	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP105 is implemented?

Question 9			
Respondent	Category	Response	Rationale
Electricity North West Limited	Network Party	Yes	-
Western Power Distribution	Network Party	Yes	Consumers will benefit from devices no longer being left incorrectly in a 'Suspended' state after a successful firmware upgrade. This means that they would be able to benefit from all Smart Metering benefits from Suppliers, Network Operators and other Users as expected.
Utilita	Large Supplier	Yes	A large portion of our customers actively use our mobile application to track their energy usage and balances. To relay this information to the customer we require use of both critical & non-critical SRs. Implementation of this mod will reduce the time lag of the current workaround and allow us to send the necessary SRs to display relevant information to our application/customers in a timelier manner.
E.ON Energy Solutions Limited	Large Supplier	Yes	If the change is implemented as designed, suspended meters once upgraded to compliant firmware will be removed from suspended state faster, restoring the smart experience for consumers in a timely manner aligned to the firmware upgrade plan of the responsible party performing the upgrades.
EDF	Large Supplier	Yes	Where a device is shown as being 'Suspended' on the Smart Metering Inventory incorrectly this will impact communications with the device for all DCC Users. Enabling this to be more easily rectified will enable communications to devices to be re-established more effectively, which then benefits the consumers that have those devices installed.

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	Implementation should ensure that devices are correctly registered within the SMI and, where no longer suspended, this will allow suppliers to continue operation of smart services for customers – a clear benefit.
OVO	Large Supplier	Yes	As already described, we believe the ability to manage any devices that have been suspended on the CPL needs to be end to end. The fact we're unable to send all SRVs in this scenario will lead to devices needing to be physically addressed and managed. The costs for which could be avoided by this Mod.
Scottish Power Energy Retail Limited	Large Supplier	Yes	We agree with the proposer that, if implemented, MP105 will better facilitate Objective (a).

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
Electricity North West Limited	Network Party	-
Western Power Distribution	Network Party	-
Utilita	Large Supplier	-
E.ON Energy Solutions Limited	Large Supplier	-
EDF	Large Supplier	-
British Gas	Large Supplier	n/a
OVO	Large Supplier	Not at this time.
Scottish Power Energy Retail Limited	Large Supplier	N/A