**MP139 ‘IVP and MVP dates for CHTS’**

**Refinement Consultation responses**

About this document

This document contains the full confidential collated responses received to the MP139 Refinement Consultation.

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

| Question 1 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | Yes | We agree that the IVP and MVP end dates should be extended to prevent significant volumes of communications Hubs from being stranded. As noted in our comments on the legal text it is not clear why the MVP end date for CHTS v1.0/GBCS v1.1 is not also being extended by 12 months – we assume that this is an oversight and that this change will be required; it certainly makes no sense to have an MVP that ends before the IVP for the same version. |
| **Utilita** | Large Supplier | Yes | Given the delays firmware release for CH and impact from the Coronavirus) Utilita welcomes appropriate reflection on IVP and MVP dates assigned.It is important to ensure the best solution for Energy Consumers and the wider industry. The dates assigned in the TSAT should always be reflective of the current climate e.g. impact of a global pandemic and if release deadlines are able to be reached in the appropriate timeframes. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | Yes | In light of the reduced rates of installation, witnessed since the emergence of COVID-19 at the beginning of the year, the Government has extended most of the schedules related to its Smart Metering Installation Programme by at least six months. However, as the situation with COVID-19 remains fluid, and as the CHTS IVP / MVP end dates were already proving tight before the pandemic’s arrival, it is becoming clear that a six-month extension to these CHTS IVP / MVP end dates will be insufficient to deplete stocks. It would only be prudent, therefore, to extend these schedules by at least one year. |
| **EUA** | Other SEC Party | No | Ensuring compatibility against versions and maintaining HAN stability (and therefore protect the customer experience) is essential in building the SMIP reputation. Device Manufacturers have listened to the industry requirements to develop (and rectify issues and/or misinterpretations in specs) to develop and implement subsequent versions and cleansed their supply chains of the SMETS 2v2.0 devices and have moved to SMETS 2 v4.2 with later stacks.The technical expertise / advice provided from Device manufacturers note they major concerns that stack issues / HAN stability could be impacted when Device Model combinations of newer versions of meters & PPMID (IHD) and installed with the old CHTS/GBCS versions.  Without significant and full device model combination testing, there are no clear indications of where the risks / issues lie with this approach of utilisation of older Comms hubs are connected to meters which operate on the requested and later version(s) of GBCS.Since manufacturers have developed new devices and cleansed their supply chains of the old versions, there is a concern this shifts a significant risk of meter removal and warranty costs on meter manufacturers due to incompatibilities outlined above. |

Question 2: Will there be any impact on your organisation to implement MP139?

| Question 2 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | - | Confidential response provided. |
| **Utilita** | Large Supplier | Yes | The impact will be positive, leading to:-Lack of wastage on CH stock and positive environmental impacts to use CH stock before end dates,-Reduce excess cost to store or manage purchase meters that are not able to be installed,-Reduce cost in coordinating site visits to replace CHs installed after IVP/MVP dates exceeded, and when new CHs are made available after these dates.-Suppliers being able to continue to work towards their roll-out duties. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | No | On the contrary, the implementation will mitigate the impacts that would otherwise be felt if these dates were left unaltered. |
| **EUA** | Other SEC Party | Yes | Device Manufacturers have developed to newer versions and therefore their supply chains of the SMETS 2v2.0 devices to provide their customers SMETS 2 v4.2 with later stacks. Entering a phase of simply installing device combinations without regard to stack incompatibilities could potentially result in new HAN stability issues, poor customer experiences and ultimately see device removal with associated costs which is not recognised. |

Question 3: Will your organisation incur any costs in implementing MP139?

| Question 3 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | No | - |
| **Utilita** | Large Supplier | No | In comparison to the potential costs without this Modification in place before IVP/MVP end dates, MP139 is more cost effective to implement. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | No | - |
| **EUA** | Other SEC Party | Yes | See response above. If issues occur, costs for triage, issue resolution (and potentially reputational impacts) for Manufacturers could occur and therefore there needs to be assured that costs associated with device issues / removal do not transfer to DM as a result of a DCC problem. Switching back on supply chains of old meters version would be extremely difficult and take significant period of time. |

Question 4: Do you believe that MP139 would better facilitate the General SEC Objectives?

| Question 4 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | Yes | We agree with the Proposer that MP139 better facilitates SEC Objective (a) as it will better facilitate the efficient provision and installation of smart metering systems by prevent Communications Hubs from being unnecessarily stranded. |
| **Utilita** | Large Supplier | Yes | By extending CH IVP/MVP dates for necessary reasons highlighted in the Modification Report this modification best facilitates SEC Objective (a) in providing provisions to continue to install valid Smart Metering Systems to Energy Consumers. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | Yes | In our view, its implementation will better facilitate the first General SEC Objective (a), which is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers’ premises within Great Britain. |
| **EUA** | Other SEC Party | No | This has the potential impact on the customer experience and could result in increased device replacement. |

Question 5: Noting the costs and benefits of this modification, do you believe MP139 should be approved?

| Question 5 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | Yes | - |
| **Utilita** | Large Supplier | Yes | For the reasons outline in Question 1 and 2.  |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | Yes | - |
| **EUA** | Other SEC Party | No | There is significant risk of increased failure rates through incompatible Zigbee stacks that would bring the program into disrepute |

Question 6: How long from the point of approval would your organisation need to implement MP139?

| Question 6 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | N/A | We do not require any lead time to implement this change. |
| **Utilita** | Large Supplier | N/A | - |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | No lead time required | - |
| **EUA** | Other SEC Party | Not applicable | This is a comms hub mod but the potential issues have programme wide impacts. The ability for device manufacturers to now switching back to supply of older versions of devices may not be possible, will be costly and, if possible take extended period of time. |

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

| Question 7 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | Yes | - |
| **Utilita** | Large Supplier | Yes | There is a valuable question to be made over how changes in the TSAT are managed in the future. MP139 implementation approach is reasonable but Utilita would also welcome a quarterly/yearly review of the timelines set in the TSAT, to address the issue in advance (rather than creating tighter deadlines) for raising these SEC Mods. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | Yes | - |
| **EUA** | Other SEC Party | No | As outlined above, the risks to the overall SMIP reputation through potential HAN stability issues, stack incompatibility issues, customer experience impacts, potential device removals and associated costs without full and detailed DMCT this should not be progressed.  |

Question 8: Do you agree that the legal text will deliver MP139?

| Question 8 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | No | As already noted, it is not clear why the MVP end date for CHTS v1.0/GBCS v1.1 is not also being extended by 12 months – we assume that this is an oversight and that this change will be required. If this is not amended the result will be an MVP that ends before the IVP for CHTS v1.0/GBCS v1.1m which makes no logical sense. |
| **Utilita** | Large Supplier | Yes | The legal text meets the requirements of MP139. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | No | We note that one of the MVP dates has not been changed in the legal text |
| **EUA** | Other SEC Party | No | - |

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP139 is implemented?

| Question 9 |
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| Respondent | Category | Response | Rationale |
| **EDF** | Large Supplier | Yes | There is no direct benefit to consumers, however there is an indirect benefit in the form of avoided stranding costs for Communications Hubs, costs which would ultimately be recovered from consumers. |
| **Utilita** | Large Supplier | Yes | This prevents the need of replacing CHs installed after IVP/MVP dates exceeded, and when new CHs are made available. This will reduce the risk of inconvenience to the customer through site visits or reduced installations as suppliers wait on these new stocks arriving.As we believe this modification will reduce the overall cost to the Smart Metering programme, and in turn, this should mean that MP139 prevents unnecessary cost of CH replacements.Indirectly, while there are delays with firmware in newer CH releases, this means that SEC Parties can continue installing SMETS2 meters and CH without issues of running low on stock within the parameters of IVP and MVP. |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | Yes | Consumers will benefit from the reduced overall cost to rollout smart meters, which we can expect to result from these greater efficiencies. |
| **EUA** | Other SEC Party | - | - |

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Question 10: Please provide any further comments you may have

| Question 10 |
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| Respondent | Category | Comments |
| **EDF** | Large Supplier | - |
| **Utilita** | Large Supplier | No further comments |
| **ScottishPower Energy Retail Ltd.** | Large Supplier | N/A |
| **EUA** | Other SEC Party | - |

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