SEC
Smart Energy Code

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Smart Energy Code

MP106

‘CHISM update for Unknown WAN Variant’

Modification Report

Version 1.0

14 December 2020

Corporate member of Plain English Campaign
Committed to clearer communication
592

About this document

This document is a draft Modification Report. It currently sets out the background, issue, proposed solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document has four annexes:

- **Annex A** contains the business requirements for the Proposed Solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the proposed solution.
- **Annex C** contains the full Data Communications Company (DCC) Preliminary Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation

Contact

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1. Summary

This proposal was raised by Chun Chen from the DCC.

For a DCC User to obtain information about Smart Metering Wide Area Network (SM WAN) Coverage, they must send Service Request 12.1 'Request WAN Matrix'. The Data Service Provider (DSP) will then provide an Availability Date and WAN Variant in response. WAN Variants are listed in Table 3 of SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials (CHISM)' Annex E. In the exception case where the Availability Date for SM WAN Coverage is known, but the WAN Variant is not, with the implementation of SEC Modification MP081 'Alignment of DUIS and CHISM to reflect current DCC Processing', the DSP will return " " Space for the South and Central regions.

As a result of the agreed solution of MP081, the response " " Space has been highlighted as a potential cause of confusion for the Supplier.

Following the Refinement Consultation and discussions held at the SEC Working Group, the Proposed Solution is to make an addition to the legal text in SEC Appendix I which will provide guidance for DCC Users, stating that the " " Space response should be read as "Unknown". This is due to the high implementation costs stated in the DCC Preliminary Assessment to replace the " " Space response with "Unknown" via a DCC System change. It was agreed that providing guidance is more suitable when looking at the costs and benefits of the modification.

This change will not have any DCC System impacts and so will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort only, with minimal lead time. It will impact Large Suppliers and Small Suppliers and is targeted for the June 2021 SEC Release.

2. Issue

What are the current arrangements?

When a DCC User sends Service Request 12.1 'Request WAN Matrix' to receive information about SM WAN Coverage, in most cases they will receive an Availability Date and WAN Variant. However, in an exception case, the Communications Service Provider (CSP) for the South and Central regions may respond to a SM WAN Coverage request (CSPM-S1 or CSPM-S2) with an Availability Date for coverage but without being able to confirm the WAN Variant that will need to be used. On receipt of this data, the DSP returns the Availability Date and the value of the unconfirmed WAN Variant in the response to Service Request 12.1 'Request WAN Matrix'. The CSP North is not affected by this problem as this response is not available for this region.

The WAN variant returned by the DSP is defined by Table 3 in SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials' (CHISM) Annex E as below:

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
“ “ Space	**“ “ Space**	**CSP South & Central**

With the implementation of MP081 ’Alignment of DUIS and CHISM to reflect current DCC Processing’, “ ” Space will be used to indicate the unconfirmed WAN Variant for the CSP for South and Central regions.

During a User engagement design discussion, it was highlighted by a Supplier that the “ ” Space response would be confusing and Users would prefer a more meaningful response. It has been suggested that the wording to use is “Unknown”.

What is the issue?

The WAN Variant “ “ Space has been highlighted as being confusing to Users. A Large Supplier has commented that this response lacks meaning. A more suitable term should be used to identify the scenario where an Availability Date can be provided but the WAN Variant cannot. This affects South and Central regions only.

In order to provide the clarity required, Table 3 in CHISM Annex E should be amended.

What is the impact this is having?

As a result of the agreed solution of MP081 ’Alignment of DUIS and CHISM to reflect current DCC Processing’, Users send Service Request 12.1 ‘Request WAN Matrix’ to check the SM WAN Coverage to obtain SM WAN coverage .“ “ Space is returned as the WAN variant in the exception case that an Availability Date for coverage is confirmed but the WAN Variant is not. This has been highlighted as a potential cause of confusion for the DCC User.

3. Solution

Proposed Solution

The Proposed Solution is to add guidance to SEC Appendix I ‘CH Installation and Maintenance Support’. This addition to the legal text will clarify to DCC Users that the DSP response “ “ Space should be interpreted as “Unknown”.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties		DCC

As the Proposed Solution is to add guidance to SEC Appendix I 'CH Installation and Maintenance Support Materials' so that the DSP response of " " Space is read as "Unknown", there is no impact on any SEC Party Category.

DCC System

This SEC Modification will have no impact on DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix I 'CH Installation and Maintenance Support Materials'

The changes to the SEC required to deliver the proposed solution can be found in Annex B.

Consumers

This modification will have no impact on Consumers.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no anticipated DCC implementation costs.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no SEC Party costs.

6. Implementation approach

Panel agreed implementation approach

The SEC Panel agreed an implementation date of:

- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received before 3 June 2021; or
- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received after 3 June 2021 but on or before 21 October 2021.

Following the expected date of the Change Board's decision, the earliest release this modification can be implemented in is the June 2021 SEC Release. If, however, the modification is approved after 3 June 2021, the modification will be implemented in the next possible release, the November 2021 SEC Release.

7. Assessment of the proposal

Observations on the issue

CSC members were supportive of the proposal and felt that the issue was well defined. The proposal was also presented to the other SEC Sub-Committees. Each SEC Sub-Committee was happy for the proposal to progress and provided no further comments on the issue.

Solution development

Originally, the wording change for the unconfirmed WAN Variant to “Unknown” was suggested by a DCC User during a User engagement design discussion. The Proposed Solution was to replace the DSP response “ “ Space with “Unknown”. Business requirements were agreed by the Proposer (see Annex A) and a Preliminary Assessment performed.

However, this was costed at £150,000 up to the end of Pre-Integration Testing (PIT) in the DCC Preliminary Assessment (see Annex C). This was deemed too expensive for what appeared to be a minor change and the DCC was challenged to explain the costs. The DCC explained that there would need to be numerous changes to the CSP for South and Central regions’ systems. As part of the design changes, the DSP would also have needed to make amendments to documentation. The DCC also advised that due to the short turnaround time (15 Working Days), Service Providers had to estimate costs broadly before refining them further under the DCC Impact Assessment. Working Group members stated that they want to see more transparency in modification costs moving forwards.

It was highlighted by Refinement Consultation respondents and agreed by the Working Group members that the business case was dramatically reduced because of the costs involved. It was proposed that adding guidance following Table 3 of CHISM would be sufficient, as the scale of the issue is not yet fully understood due to MP081 not yet being implemented.

The Working Group agreed with the non DCC System impacting solution and felt it should be progressed. The Proposer agreed and acknowledged that due to the high costs of the original Proposed Solution something simpler and less expensive should be progressed. A Working Group member queried if this solution would still require a modification. The DCC confirmed the guidance would be added to SEC Appendix I. As this forms a SEC Subsidiary Document a modification is still needed to amend it.

Although the Change Board had initially approved the costs of the Impact Assessment (£19,480), due to the change to the Proposed Solution, the DCC Impact Assessment was not required and so was not requested.

Support for Change

Working Group

The Working Group was supportive of the amended Proposed Solution, believing it to be the most cost-effective approach to resolving the identified issue. It did not believe there would be sufficient benefits to justify the cost of changing the DCC Systems to report “Unknown” instead of “ “ Space.

Refinement consultation

The three Refinement Consultation respondents felt the original Proposed Solution of amending the DSP response incurred too high a cost and suggested that providing guidance would be more cost-effective. Once this was discussed at the Working Group, the Proposer agreed that this was the best way forward.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification better facilitates SEC Objectives (a)[1], (c)[2] and (g)[3]. This is because the Proposed Solution will give a better indication of the scenario where the WAN Variant is unknown, making it clear to Suppliers of the situation. This modification will add further clarity to the SEC by removing potential confusion when a User requests SM WAN coverage.

Industry views

SECAS received three responses to the Refinement Consultation and each respondent raised concern regarding the implementation costs. Issues have arisen surrounding the business case as the relatively small amendment has such a high associated cost. However, two of the respondents did agree with the Proposer that the original solution would have better facilitated SEC Objectives (a) and (g).

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on the safety and reliability of the smart metering systems.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the cost of energy bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will provide a positive impact on the quality of service as the Proposed Solution removes the margin for confusion for Suppliers when they receive the DSP response " " Space, allowing them to action next steps sooner and address connectivity issues more efficiently.

Benefits for society as a whole

This modification will have a neutral impact regarding benefits for society as a whole.

[1] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.
[2] Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.
[3] Facilitate the efficient and transparent administration and implementation of the SEC.

Appendix 1: Progression timetable

This modification will now be presented to Panel with the recommendation it be issued for Modification Report Consultation, followed by the Change Board vote under Self-Governance.

Timetable	
Event/Action	**Date**
Draft Proposal raised	30 Dec 2019
Presented to CSC for final comment and recommendations	28 Jan 2020
Panel converts Draft Proposal to Modification Proposal	14 Feb 2020
Business requirements developed with Proposer and DCC	Feb 2020
Preliminary Assessment requested	26 Mar 2020
Preliminary Assessment returned	11 Jun 2020
Discuss at the July Working Group meeting	1 Jul 2020
Refinement Consultation	8 Jul 2020 – 29 Jul 2020
Impact Assessment costs approved by Change Board	22 Jul 20
Modification discussed at Working Group	7 Oct 20
Legal text amended	Oct 20
Modification Report approved by Panel	11 Dec 20
Modification Report Consultation	14 Dec 20 – 8 Jan 21
Change Board Vote	20 Jan 21

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**
CHISM	Communications Hub Installation and Maintenance Support Materials
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SM WAN	Smart Metering Wide Area Network
WAN	Wide Area Network

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MP106 'CHISM update for Unknown WAN Variant'

Annex A

Business requirements – version 0.2

About this document

This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	**Requirement**
1	To amend the response in the case of an unconfirmed WAN Variant in the South and Central regions from “ “ Space to “Unknown”
2	Once amendment is made, “Unknown” response to be implemented for the WAN Coverage File provided by CSP South and CSP Central

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 Requirement 1: To amend the response in the case of an unconfirmed WAN Variant in the South and Central regions from “ “ Space to “Unknown”

During a User engagement design discussion, it has been highlighted by a customer that the “ “ Space response in the case of an unconfirmed WAN Variant (in the South and Central regions) is confusing and that a more meaningful response would be preferred. It has been suggested that the wording to use is “Unknown”. Table 3 in Smart Energy Code (SEC) Appendix I ‘Communications Hub Installation and Maintenance Support Materials’ (CHISM) below shows the responses the User may receive from the Data Communications Company (DCC).

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
“ “ Space	**“ “ Space**	**CSP South & Central**

2.2 Requirement 2: Once the amendment is made to SEC Appendix I, “Unknown” response to be implemented for the WAN Coverage File provided by CSP South and CSP Central

The WAN Coverage File is produced by the Communications Service Provider (CSP) for the South and Central regions. The WAN Coverage File is not a SEC Document, however the amendment of the response should also be implemented for consistency.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
CHISM	Communications Hub Installation and Maintenance Support Materials
DCC	Data Communications Company
DSP	Data Service Provider
SEC	Smart Energy Code
WAN	Wide Area Network

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MP106 'CHISM update for Unknown WAN Variant'

Annex B

Legal text – version 1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 16.0.

Appendix I 'CH Installation and Maintenance Support Materials'

Amend the following to CHISM Annex E3

E.3 Communications Hub WAN Variant Values

E3.1 For the purpose of providing WAN Technology values for use with the 12.1 RequestWANMatrix Service Request as detailed in APPENDIX AD 'DCC User Interface Specification', Communications Hub WAN Variant values are listed in table 3

Table 3; Summary of all Communications Hub WAN Variants for use with Service Request 12.1

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
" " Space	" " Space	CSP South & Central

To note: on Table 3, " " Space above, CSP South & Central will respond to a SMWAN Coverage request (CSPM- S1 or CSPM-S2) with an Availability Date for coverage but without confirming the WAN Variant that will need to be used. Upon receipt of this WAN Variant, the Service User will read " " Space as WAN Variant unknown.

Data Communications Company

SEC Modification Proposal, SECMP0106, DCC CR1335

CHISM[1] Update for Unknown WAN[2] Variant

Preliminary Impact Assessment (PIA)

Version:	**0.2**
Date:	**11th June, 2020**
Author:	**DCC**
Classification:	**DCC PUBLIC**

[1] Communications Hub Support Materials (CHISM)
[2] Wide Area Network (WAN)

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1 Document History

1.1 Revision History

Revision Date	Revision	Summary of Changes
09/06/2020	0.1	Initial version
10/06/2020	0.2	Internal DCC reviews complete

1.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	MP106 Business-Requirements v0.1	SECAS	03/04/2020
2	MP106 Preliminary Assessment Request	SECAS	03/04/2020

References are shown in this format, [1].

1.3 Document Information

The Proposer for this Modification is Chun Chen of SmartDCC. The original proposal was submitted on the 30th December 2019.

The Preliminary Impact Assessment was requested of DCC on 6th April 2020.

2 Context and Requirements

In this section, the context of the Modification and the requirements are stated. These have been provided by SECAS and the Proposer.

2.1 Context

For a DCC User to obtain a Smart Metering Wide Area Network (SM WAN) Coverage, they must send Service Request 12.1 'Request WAN Matrix'. The Data Service Provider (DSP) will then provide an Availability Date and WAN Variant in response. WAN Variants are listed in Table 3 of SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials (CHISM)' Annex E. In the exception case where the Availability Date for SM WAN Coverage is known, but the WAN Variant is not, with the implementation of SECMP0081 'Alignment of DUIS and CHISM to reflect current DCC Processing', the DSP will return " " (Space) for the South and Central regions.

2.2 Issue

When a DCC User sends Service Request 12.1 'Request WAN Matrix' to receive SM WAN Coverage, in most cases they will receive an Availability Date and WAN Variant. However, in an exception case, the Communications Service Provider (CSP) for the South and Central regions may respond to a SM WAN Coverage request (CSPM-S1 or CSPM-S2) with an Availability Date for coverage but without being able to confirm the WAN Variant that will need to be used. On receipt of this data, the DSP returns the Availability Date and the value of the unconfirmed WAN Variant in the response to Service Request 12.1 'Request WAN Matrix'.

The WAN variant returned by the DSP is defined by Table 3 in Smart Energy Code (SEC) Appendix I 'Communications Hub Installation and Maintenance Support Materials' (CHISM) Annex E as below:

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South and Central
Cellular+Mesh	Cellular+Mesh	CSP South and Central
No Coverage Intended	No Coverage Intended	N/A
" " Space	" " Space	CSP South and Central

With the pending implementation of SECMP0081 'Alignment of DUIS and CHISM to reflect current DCC Processing', a " " Space will be used by the CSP for the South and Central regions to indicate the unconfirmed WAN Variant.

2.3 Business Requirements

This section contains the considerations and assumptions for each business requirement.

1	To amend the DSP response in the case of an unconfirmed WAN Variant in the CSP South and Central regions from “ “ Space to “Unknown”

Table 1: Business Requirements for SECMP0106, CR1335

During a User engagement design discussion, it was highlighted by a customer that the “ ” Space response would be confusing and they would prefer a more meaningful response. It has been suggested that the wording to use is “Unknown”.

This change will require an update to the SM WAN coverage database managed by the CSP South and Central regions. A CHISM documentation change to Table 3 in CHISM Annex E must be included.

3 Description of Solution

The only Service Provider directly impacted by this Modification is CSP South and Central. The solution changes will include:

- Modification to the Telefónica Coverage Deployment Model output and SMWAN Coverage Checker Database to support the inclusion of "Unknown" instead of " " (space) as one of the recommended Communication Hub variant type against a post code when a WAN variant is not confirmed.
- The CSP Network Coverage Extract data extract files provided by the CSP per region i.e. one for CSP Central and one for CSP South via the existing CSP/DSP interface, will also include 'Unknown' as a Communication Hub variant when the WAN variant is not yet confirmed against a post code.

Additionally there will be reviews of the following uplifted documentation during the development of the Full Impact Assessment (FIA):

- SEC document Appendix I 'CH-Installation-and-Maintenance-Support-Materials' which includes an update to Annex E.3. Communications Hub WAN Variant Values. This change will take place.
- Modification to the CSP South and Central Reporting systems to include changes to the business rules to be able to process 'Unknown' when the Recommended Communication Hub variant type is 'Unknown'.

There will be a change to CSP South and Central Test stub (DSP Emulator) to validate in PIT testing the response data to a request received over the CSP Management Gateway for a postcode or at a specific premise within a postcode or for a postcode district level.

The SD4.4.4 CSP Management Interface Specification is a design document maintained by the DSP. The attribute "commsHubVariant" in table 5 in this specification has a data type of String(30) which means the new value of 'Unknown' can be accepted without change.

Name	Description	Type	Mandatory
commsHubVariant	The value provided will be the relevant WAN variant, to indicate the WAN technology to be used for this postcode. Possible values "Cellular", or "Cellular+Mesh" or "Special Installation Mesh". If no coverage is planned then a value of " " (single space) will be returned.	String(30)	Yes

As part of the design changes, the DSP will add a new example value of 'Unknown' to the above table in SD 4.4.4 document.

4 Implementation Timescales and Approach

The scope under this PIA includes design, development (build), system testing, and performance testing within the PIT environments.

4.1 Implementation Approach

Whenever this Modification is implemented, based on the stated requirements above, the elapsed time for Design, Build and PIT will be approximately 3 months following the provision of full commercial cover.

The release lifecycle duration will be confirmed as part of the FIA. This work could be part of a maintenance or major SEC release.

The documentation change could be scheduled around the release date.

4.2 Release Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal.

The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as assumed now. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a Full Impact Assessment and as such there may be elements missing from the solution or the solution may be subject to a material change during discussions with the DCC. As a result the final offer price may result in a variation.

The table below details the cost of delivering the changes and Services required to implement this Modification. For a PIA, only the Design, Build and PIT indicative costs are supplied.

£	Design, Build and PIT	Total
Phase ROM	150,000	£150,000

Based on the existing requirements, the fixed price cost for a Full Impact Assessment is £19,480and would be expected to be completed in 30 days.

4.3 Contract Schedules

Schedules will require modification to reflect the changes necessitated under this Modification. The contract schedules should be updated as part of a CAN which combines schedules updates from other relevant CRs.

At a minimum, the following contract schedules will require modification:

- Schedule 3 DCC Responsibilities
- Schedule 6.1 – to include delivery Milestones in relation to this CR
- Schedule 6.2 – Testing and Acceptance

- Schedule 7.1 – to reflect the new Charges for this CR

Additional Schedules may require modification due to the outcome of commercial discussions, which will follow submission of this Preliminary Assessment.

Schedules will require modification for both the Central and South CSP regions.

5 Risks, Assumptions, Issues, and Dependencies

The tables below provides a summary of the Risks, Assumptions, Issues, and Dependencies (RAID) observed during the production of the PIA.

DCC requests that the Working Group considers this section and considers any material matters that have been identified. Changes may impact the proposed solution, implementation costs and/or implementation timescales.

5.1 Risks

None at this time.

5.2 Assumptions

These assumptions have been used in the creation of this PIA. Any changes to the assumptions may require DCC to undertake further assessment**.**

Ref	Description	Status/Mitigation
MP106-AT01	Assume that this Modification will be released as a standalone DCC-L release.	Rejected, as is yet to be decided, and will not impact this PIA
MP106-AT03	Assume that the Communication Hub WAN variant values in Annex E.3 of SEC Appendix I 'CH Installation and Maintenance Support Materials' will be updated first to include " " (space) as a WAN variant for CSP Central and South as part of planned SEC Modification proposal SECMP0081 which is currently scheduled to be implemented as part of Nov'20 SEC Release.	Accepted
MP106-AT04	Assume there will be no changes to the PIT test approach as part of this Modification.	Accepted

5.3 Issues

None at this time.

5.4 Dependencies

Reference	Dependency	Required to	Status
MP106-DT01	Dependent on the DCC making available the uplifted SEC Appendix I 'CH-Installation-and-Maintenance-Support-Materials' specification prior to the Impact Assessment stage.	Review and confirm if the changes to its SMWAN Network Coverage data is compliant with the SEC documentation.	Rejected, updated Annex will be provided during FIA
MP106-DT02	Dependent on the updated DSP SD4.4.4 specification which includes the changes to the response data to its CSP hosted API.	CSP South and Central will not be able to make the relevant changes to the Network Coverage file extract data.	Rejected. SD4.4.4 already allows string values, no change required for this Modification

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

.Acronym	Definition
CH, Comms Hub	Communications Hub
CHISM	Communications Hub Support Materials
CR	(DCC) Change Request
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
FIA	Full Impact Assessment
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SP	Service Provider

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MP106 'CHISM update for Unknown WAN Variant'

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP106 Refinement Consultation.

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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	No	E.ON believes this is an unnecessary change and will result in needless additional costs being incurred.
Western Power Distribution	Networks Party	Yes	We agree that the proposed solution sounds reasonable and will provide better clarity for Suppliers.
Utilita	Large Supplier	Solution seems reasonable and straightforward although we are finding it difficult to support this modification as the cost of implementation seems to be excessive.	Looking at the cost alone it appears that DCC has built a testing regime that is not fit for purpose, if a small change like this has such a cost behind it. It raises questions about the robustness of the DCC System for any other implementations in the future.

Question 2: Will there be any impact on your organisation to implement MP106?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	Yes	E.ON will have to invest money and resources to change our systems. Our systems are working effectively using the WAN Variant " "(Space). We do not agree changing a working system with little benefit is cost efficient. We also believe the DCC modification costs of £150,000 will be better spent in other areas.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 3: Will your organisation incur any costs in implementing MP106?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	Yes	We do not have a cost value at this stage, but we can confirm this will provide no cost savings or benefit.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 4: Do you believe that MP106 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	Yes	We believe that this modification would better facilitate SEC Objectives (a) and (g).
Utilita	Large Supplier	Yes	The solution proposed will add further clarity for Suppliers.

Question 5: Noting the costs and benefits of this modification, do you believe MP106 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	N/A	Whilst we are likely minded to approve this modification we would challenge the costs for such a minor change. Please also see comments under Question 10.
Utilita	Large Supplier	No	Given the costs for implementation, perhaps it is worth investigating alternative solutions to deliver similar benefits. For example, a wording change in documentation which explains that " " should be read as: 'Unknown' might be just as useful. The cost should be more proportionate to the benefit.

Question 6: How long from the point of approval would your organisation need to implement MP106?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	Currently we believe this will take up to six months.	No comment.
Western Power Distribution	Networks Party	N/A	No comment.
Utilita	Large Supplier	N/A	No comment.

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

Question 7			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	No	As noted above we do not believe this should be implemented.
Western Power Distribution	Networks Party	No	Whilst we understand the reasons given we would challenge the change being delayed when it forms part of the install process. We would challenge whether this should be implemented earlier to assist the roll out.
Utilita	Large Supplier	N/A	No comment.

Question 8: Do you agree that the legal text will deliver MP106?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	Yes	No comment.
Western Power Distribution	Networks Party	Yes	No comment.
Utilita	Large Supplier	Yes	No comment.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP106 is implemented?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
E.ON	Large Supplier	No	This will not benefit customers as it will incur additional unnecessary costs within the industry.
Western Power Distribution	Networks Party	Yes	The solution proposed in the modification would assist Suppliers in understanding exactly what the situation is on site and therefore ensure that the Consumer have the correct expectations when an installation is booked.
Utilita	Large Supplier	No	No comment.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	**Category**	**Comments**
E.ON	Large Supplier	No comment.
Western Power Distribution	Networks Party	As mentioned previously we would like to understand exactly where the costs stem from as they seem quite large for a seemingly minor change. We would also like clarification around the Business Requirements in the DCC PIA. There are two Business Requirements detailed in the Modification Report, however there is only one within the DCC PIA and this requirement is slightly different. The requirement within the DCC PIA mentions DSP, however everything else is relating to CSP C&S. We would like to better understand exactly where the change is required, i.e. do CSP need to make changes or can DSP just provide amended wording to the User and the costs associated with each.
Utilita	Large Supplier	No comment.