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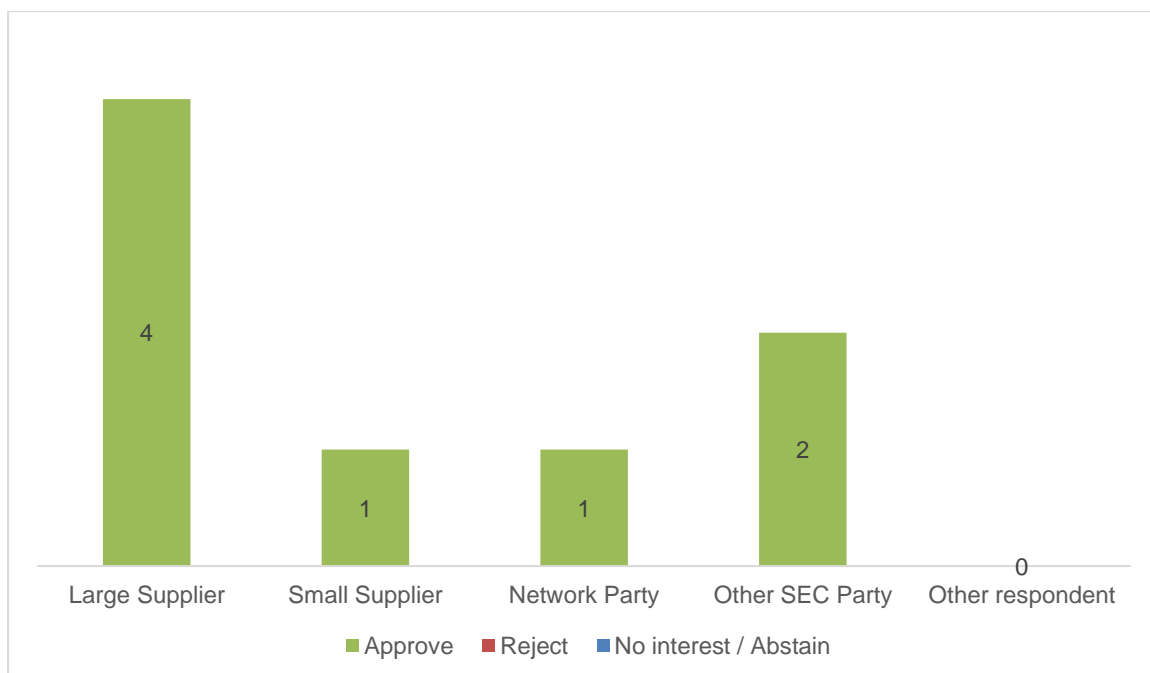
MP148 'IVP Extension for pre-SMETS v4.2 Devices'

Modification Report Consultation responses

About this document

This document contains the full non confidential collated responses received to the MP148 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP148 should be approved?

Question 1			
Respondent	Category	Response	Rationale
Calvin Capital Ltd.	Other SEC Party	Approve	We agree that this Modification Proposal better facilitates SEC General Objective (a) by helping to better facilitate the efficient provision and installation of smart metering systems by avoiding costs and environmental wastage through stock write offs.
E.ON / npower	Large Supplier	Approve	Failing to approve will cause unnecessary financial losses for suppliers, and create a large volume of assets that will need to be scrapped, which will have a negative impact on the environment and public opinion on the smart roll out.
Haven Power	Small Supplier	Approve	We support MP148 on the basis that it facilitates SEC General Objective (a) – to facilitate the efficient provision, installation and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within GB – The speed of Smart installations has reduced drastically as a result of the Covid-19 pandemic and, as a consequence, we're left with a build-up of stock in the supply chain. Scrapping a considerable number of devices for no other reason than an expired IVP would result in significant environmental and financial costs, the latter of which would ultimately be passed on to consumers.
Bulb Energy	Large Supplier	Approve	<p>We fully support the proposal to extend the IVP to 27 April 2022, as it provides suppliers, installers and MAPs additional time to manage supply chains as Covid-19 continues to have an impact smart meter installations eg. changes in consumer willingness, or flexibility for installations under fluid UK restrictions.</p> <p>MP148 better facilitates SEC Objective (a) by mitigating the cost of scrapped assets and/or costs to return devices to manufacturers to be upgraded to v4.2 versions. Without an IVP</p>

Question 1			
Respondent	Category	Response	Rationale
			extension, Bulb would have a large number of pre v4.2 assets that would need to be upgraded or scrapped. This would generate cost, and possibly environmental waste, to our smart installation programme.
Utilita Energy	Large Supplier	Approve	<p>Utilita is supportive of the extension of IVP dates for pre- SMETS2 v4.2 devices. As lockdown restrictions continue across the U.K, an extension is necessary to prevent stock from being scrapped.</p> <p>This implementation will better facilitate SEC Objective (a) as it will better facilitate the efficient provision and installation of smart metering systems</p>
Western Power Distribution	Networks Party	Approve	We believe that this modification better facilitates SEC Objective (a) by ensuring efficient installation and operation of the smart energy systems
OVO	Large Supplier	Approve	We agree that this aligns to SEC Objective a) as per the Modification Report.
Horizon Energy Infrastructure	Other SEC Party	Approve	Covid-19 has had an impact on installation levels and there have been some delays from manufacturers releasing the latest version. Both of these factors mean that there has been a build up of pre-SMETS2v4.2 stock. Also firmware upgrades aren't as smooth as they should be meaning that suppliers with the right intentions are finding it difficult to comply.

Question 2: Please provide any further comments you may have.

Question 2		
Respondent	Category	Comments
Calvin Capital Ltd.	Other SEC Party	Delays in the smart meter installation programme are an on-going issue due to the covid pandemic and lockdown measures imposed. This change will help to mitigate the effects of these delays by allowing existing stocks of pre SMETS2v4.2 devices to be installed over the coming months.
E.ON / npower	Large Supplier	No.
Haven Power	Small Supplier	In light of ongoing uncertainty around when Suppliers can resume normal levels of Smart meter installations, we welcome the proposal to extend the IVP by 12 months, rather than 6. This is a more realistic extension which will reduce the likelihood of a further mod being required in the future.
Bulb Energy	Large Supplier	-
Utilita Energy	Large Supplier	No further comments
Western Power Distribution	Networks Party	
OVO	Large Supplier	N/A
Horizon Energy Infrastructure	Other SEC Party	The 12 month extension is welcomed and feels like the right thing to do given all factors involved.