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DP154 'CH Returns SLA Amendment'

Modification Report

Version 0.2

20 April 2021

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has one annex:

- **Annex A** contains the full non confidential responses to the Request for Information (RFI).

Contact

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1. Summary

This proposal has been raised by Sasha Townsend from the Data Communications Company (DCC).

Smart Energy Code (SEC) Parties have raised concerns in relation to the Communications Hub removal and return processes. They have highlighted that it is not possible to process a Communications Hub return and send either one of Service Request 8.14.3 or 8.14.4 within five Working Days of the removal of the Communications Hub. They believe this Service Level Agreement (SLA) should be extended to 15 Working Days to prevent a breach of the SEC and incurring charges and that changes are needed to the SEC wording to ensure Users aren't charge if they process the return within the SLA.

2. Issue

What are the current arrangements?

During a Communications Hub lifecycle, the Device may end up being removed from a premise and returned to a warehouse due to faults in a unit. If so, then the faulty unit will undergo the removal and returns process to be sent back. The Communications Hub may also be removed from a premise and returned without a fault with a unit.

Following removal of the Communications Hub, the SEC Party will notify the DCC by submitting either Service Request 8.14.3 'Communications Hub Status Update – Fault Return' or Service Request 8.14.4 'Communications Hub Status Update – No Fault Return' indicating the appropriate return type, as specified in Appendix AD 'DCC User Interface Specification' (DUIS).

SEC Section F 'Smart Metering System Requirements' 8.9(a) states that SEC Parties are obligated to notify the DCC of returns of Communications Hubs in accordance with SEC Appendix I 'Communications Hubs Installation and Maintenance Support Materials' (CHIMSM). SEC Section I9.4 further states that the SEC Party shall notify the DCC of its removal and intended return within five Working Days of the date of removal using Service Request 8.14.3 or Service Request 8.14.4.

Currently, where a SEC Party does not send the Service Request within five Working Days, the reason for return shall be deemed to be a Communications Hub User Responsibility, as set out in SEC Section F9.6(a).

What is the issue?

SEC Parties have raised concerns in relation to this process, they have highlighted that it is not possible to process a Communications Hub return and send either the Service Request 8.14.3 or Service Request 8.14.4 within five Working Days of the Communications Hub's removal. Due to activities such as the physical unloading and processing of the removed Communications Hub at the respective SEC Party's warehouse, SEC Parties have noted that they would require at least 15 Working Days to send one of these Service Requests.

Missing the current timescale means that the SEC Party will be obliged to pay a charge, either the "CH returned and redeployed" (K7.5(o)) or "CH returned not redeployed" (K7.5(p)) charges in SEC Section K 'Charging Methodology'. This is because the SEC currently states that these charges will

have to be paid by the SEC Party if it exceeds the five Working Days SLA. This therefore results in a SEC Party potentially incurring a charge when it has followed the guidance as set out in the SEC, but where the DCC needs to process the return and exceeds the currently obligated SLA time. This highlights an issue of additional time being required for the existing CH returns SLA, and that a User can still be charged even if they adhere to the current SLA.

What is the impact this is having?

If this issue remains unresolved, it will lead to more SEC Parties incurring the charges, even if the responsibility is with the DCC at that point of the Communications Hub returns process. This is a text only change and extending the SLA will not impact SEC Parties negatively as any processes built on the five-day SLA will still be valid.

This was supported in an RFI that the Smart Energy Code Administrator and Secretariat (SECAS) issued where respondents noted that they have had thousands of Devices that have exceeded this returns SLA length.

Impact on consumers

This issue does not have any impact on consumers.

3. Assessment of the proposal

Observations on the issue

Panel Sub Committees

The Operations Group noted an interest in the Draft Proposal, believing that any change to the length of time in the Communications Hub returns process would be within its remit. The Draft Proposal will return to the Operations Group for updates as the proposal progresses. The Technical Architecture and Business Architecture Sub Committee (TABASC) and the Security Sub Committee (SSC) had no interest in the Draft Proposal.

Request for Information

An RFI was issued asking industry members about the impact the current Communications Hub returns SLA was having on them. As part of this consultation, they were asked about the number of Communications Hubs returned in the last year, and whether they had incurred financial penalties during this time. The full set of non-confidential responses have been provided in Annex A.

All of the respondents to the RFI were Large Suppliers and stated that the existing five working day SLA is too short and that they would like the returns process time extended. Collectively, respondents highlighted thousands of Communications Hub units were left outside of this SLA between March 2020 and March 2021. This indicates that this is not affecting a few individual cases, but instead could be affecting Communications Hub returns on a more regular basis.

When asked about whether they would benefit from an increase from five Working Days to 15 Working Days for the returns SLA, half of the respondents agreed with this and the other half believed it should be extended further. Some of the respondents noted there would be a potential cost saving in the event of the SLA extension, while others noted they believed it wouldn't affect their current operations. Other comments which were noted included whether there was any process for challenging charges under the existing returns process if it was due to a fault rather than no fault for the specific Communications Hub unit.

Appendix 1: Progression timetable

The Draft Proposal will return to the Change Sub Committee (CSC) on 27 April 2021 where it will be asked to recommend whether it should progress to a Modification Proposal. The CSC's recommendation will be presented at the Panel meeting on 14 May 2021.

SECAS recommends any Modification Proposal should progress to the Refinement Process. SECAS will look to hold discussions with the Proposer to agree their business requirements, considering the comments returned in the RFI. These will be presented to the Working Group and the Operations Group to comment on whether these would be suitable to request a Preliminary Assessment with.

Timetable	
Event/Action	Date
Draft Proposal raised	15 Feb 2021
Issued for Request for Information	8 Mar 2021 – 19 Mar 2021
Presented to CSC for initial comment	30 Mar 2021
Presented to Panel Sub Committees	1 Apr 2021 – 16 Apr 2021
Presented to CSC for final comment and recommendation	27 Apr 2021
Presented to Panel for conversion to Modification Proposal	14 May 2021
Business requirements agreed with Proposer	17 May 2021 – 21 May 2021
Presented to Operations Group	1 Jun 2021
Presented to Working Group	2 Jun 2021

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
CHIMSM	Communication Hub Installation and Maintenance Support Materials
CSC	Change Sub Committee

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Glossary	
Acronym	Full term
DCC	Data Communications Company
DUIS	DCC User Interface
RFI	Request for Information
SLA	Service Level Agreement
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub Committee
TABASC	Technical Architecture and Business Architecture Sub Committee