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MP117 'Bulk CH returns'

Modification Report

Version 0.7

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Corporate member of
Plain English Campaign
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592



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About this document

This document is a Modification Report. It sets out the background, issue, 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 also has four annexes:

- **Annex A** contains the business requirements for the 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) Impact Assessment response.
- **Annex D** contains the full Refinement Consultation responses.

Contact

If you have any questions on this modification, please contact:

Harry Jones

020 7081 3345

harry.jones@gemserv.com

1. Summary

This proposal has been raised by Sasha Townsend from the DCC.

SEC Section F5 'Communication Hub Forecasts & Orders' allows any SEC Party to place orders for Communications Hubs (CHs) from the DCC. Specified SEC Parties can notify the DCC under SEC Section F8.7 in the event of needing to return the CH. This is done by submitting either DCC User Interface Specification (DUIS) Service Requests 8.14.3 'Communications Hub Status Update – Fault Return' or 8.14.4 'Communications Hub Status Update – No Fault Return'.

Currently, these Service Requests allow DCC Users to input one Global Unique Identifier (GUID) per request. This means that DCC Users must send an individual Service Request to notify the DCC of each CH return. This takes a significant amount of time and effort when multiple CHs require return. DCC Users have stated that this is not a sustainable approach in dealing with returns and have requested the ability to upload and trigger all the necessary Service Requests relating to a bulk CH return.

The Proposed Solution is to therefore increase the number of GUIDs on Service Requests 8.14.3 and 8.14.4 used for issuing CH returns. This should allow for the return of multiple CH units in a single Service Request.

This modification will cost approximately £400,000 - £450,000 with a nine-month lead time. It will impact Large Suppliers, Small Suppliers and the DCC. The Smart Energy Code Administrator and Secretariat (SECAS) recommends this is a Self-Governance Modification and the targeted implementation date is 30 June 2022 (June 2022 SEC Release).

2. Issue

What are the current arrangements?

SEC Section F5 'Communication Hub Forecasts & Orders' allows any SEC Party to place orders for CHs. Any Supplier Party can notify the DCC under SEC Section F8.7 if they need to return a CH. A Party wishing to return a CH is entitled to do so at any time.

Parties currently return Communications Hubs to the DCC for several reasons, including:

- A CH fault/defect is identified either prior or post installation;
- CHs are destroyed or damaged in transit/storage; or
- The DCC requests that Parties return CHs to the DCC because of a Product Recall or Technology Refresh.

SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials' (CHIMSM) currently sets out the procedures for notifying the DCC of a CH return. It requires DCC Users to submit one of two Service Requests (SR) depending on the reason for return:

- SR 8.14.3 'Communications Hub Status Update – Fault Return'; or
- SR 8.14.4 'Communications Hub Status Update – No Fault Return'.

On submission of a SR 8.14.3 or a SR 8.14.4, a Returns Remedy Record is automatically generated, which starts a CH returns process (approx. 90 days) from the DCC User back to the DCC.

What is the issue?

Currently, these Service Requests allow DCC Users to input one GUID per request. This means that DCC Users must send an individual Service Request to notify the DCC of each CH return.

DCC Users are reporting that to trigger an individual Service Request can take a significant amount of time and effort per CH. They have stated that this is not a sustainable approach in dealing with returns. Therefore, DCC Users have requested the ability to upload and trigger all the necessary Service Requests relating to a bulk CH return.

What is the impact this is having?

If this issue is not addressed, it will continue to cause inefficiencies by duplicating time and effort for DCC Users attempting to return multiple CHs.

Impact on consumers

There is no impact on consumers.

3. Solution

Proposed Solution

The Proposed Solution is to increase the number of GUIDs on the following Service Requests used for issuing CH returns:

- SR8.14.3 'Communications Hub Status Update – Fault Return'; and
- SR8.14.4 'Communications Hub Status Update – No Fault Return'.

This should allow for the return of multiple CH units in a single Service Request. The DCC has confirmed that there will be a cap of 999 Device IDs available per Service Request. A DCC User will be able to track the progress of its individual CH units from a bulk return through the Self-Service Interface (SSI).

The business requirements for the Proposed Solution can be found in Annex A.

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

Supplier Parties

Large Suppliers and Small Suppliers will be positively impacted by this Proposed Solution by being able to send a request for large quantities of CH returns. This is due to not having to send multiple Service Requests for returning a large number of CH units, instead fewer requests will be needed, and less time and effort is required.

Large Suppliers responding to the Refinement Consultation stated that they would need to uplift to a new DUIS version in order to benefit from the Proposed Solution and make internal changes to accommodate this. Some Large Suppliers stated in this consultation that these changes made to the systems would be positive and the logistical benefits and efficiencies will make it worthwhile. However, one Large Supplier mentioned that they have an automated process in place for returning CH units, and that the changes that this Modification Proposal would make would provide no real benefit to them.

DCC

The DCC will be positively impacted by this Proposed Solution by reducing the number of SR8.14.3s and SR8.14.4s that need to be accepted into the DCC Systems. This will be due to increasing the number of GUIDs on each SR, meaning that it will contribute to less traffic in the DCC System and will provide a more efficient use of its existing capacity.

DCC System

The DCC Systems will be impacted by this Modification Proposal. Changes will be required to the Service Request definitions in the DUIS Schema, and both Request Management and Data Management components are impacted at a Data Services Provider (DSP) level. The DSP is the only DCC Service Provider impacted by this proposal.

The full impacts on DCC Systems and the DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex C.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AD 'DCC User Interface Specification'

The changes to the SEC required to deliver the proposed solution can be found in Annex B. The Impact Assessment in Annex C indicates which parts of the DUIS require the redlined changes, and notes its Extensible Markup Language (XML) Schema requires changes.

Technical specification versions

The DCC has confirmed that the DUIS will be the only technical specification affected by the Modification Proposal. These changes will be implemented in the new version of the DUIS created by the corresponding Release; no previous versions will be impacted.

Consumers

There are no impacts to consumers currently identified.

Other industry Codes

No other industry Codes are impacted.

Greenhouse gas emissions

There are no impacts to greenhouse gas emissions.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is £400,000 - £450,000 as a standalone release cost. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£300,000 - £350,000
Post PIT	£50,000 - £100,000

The costs for Systems Integration Testing (SIT), User Integration Testing (UIT) and Implement to Live will be confirmed in the DCC Impact Assessment. More information can be found in the DCC Impact Assessment response in Annex C. A further breakdown can be found in the (RED) Annex to the Impact Assessment which will be available upon request from SECAS for SEC Parties by emailing sec.change@gemserv.com.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

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

SEC Party costs

SEC Parties stated in the Refinement Consultation that they would incur some costs implementing the Proposed Solution.

One respondent stated that they would have to incur a significant cost for moving to a new version of the DUIS which this Modification Proposal would require. The respondent did say that trying to isolate the individual cost of these impacts compared to other parts of a DUIS changing SEC Release would be hard to isolate, but confirmed that they wouldn't want to upgrade their version of DUIS to specifically include this change.

Another respondent also noted that they would have difficulties isolating the cost to just this Modification Proposal as part of a wider Release, but confirmed they would be incurring a cost to implement the solution.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **30 June 2022** (June 2022 SEC Release) if a decision to approve is received on or before 30 September 2021; or
- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received after 30 September 2021 but on or before 3 February 2022.

This Modification Proposal will be targeted for June 2022 as there are other DUIS impacting Modification Proposals and planned changes to Enduring Change of Supplier (ECoS) Systems. It is appropriate that MP117 is included alongside these changes as it would be the earliest time it could be implemented in a DUIS affected SEC Release.

The majority of SEC Parties who responded in the Refinement Consultation stated that six months of lead time would be sufficient following approval. One respondent noted that they would need between eight -12 months of lead time, citing that any DCC Release has a considerable lead time due to the other changes that would be included in the Release. Responses in the Refinement Consultation supported the Modification Proposal being included in the November 2021 SEC Release, so views will be sought whether industry would agree with the newly proposed implementation date of the June 2022 SEC Release.

7. Assessment of the proposal

Observations on the issue

When this Draft Proposal was taken for initial comment to the Change Sub-Committee (CSC), members did not have any comments on the proposal. Members agreed it would benefit from seeking additional input from the Panel Sub-Committees and SEC Parties before being considered for conversion to a Modification Proposal.

A Large Supplier asked whether two other Service Requests could be included. Suppliers have to trigger SR 8.14.1 and SR 8.14.2, which are both CH Status Update (8.14.1 for Install Success and 8.14.2 for Install no Smart Metering Wide Area Network (SM WAN)) as part of its business returns process, SECAS asked the Proposer if there was scope to include these Service Requests in the Draft Proposal. The Proposer confirmed that they had no plan to include the mentioned Service Requests due to them not explicitly being part of the returns process for a CH. They did express however if there was a benefit to grouping those specific Service Requests together, that this should be followed up as a separate Draft Proposal.

The Draft Proposal was taken to the Panel Sub-Committees. The Technical Architecture and Business Architecture Sub-Committee (TABASC) was supportive, with one member stating that there is definitely an issue that needs addressing. It wanted to know whether other areas of the SEC would have to be changed as well as any technical specification impacts. SECAS has confirmed no other areas of the SEC would need to be changed. It also enquired if it is down to the individual User and their business processes for how Service Requests are submitted. One TABASC member indicated there was a considerable amount of documentation required alongside Service Requests and wondered how this would be dealt with. The DCC confirmed that there is no paperwork that it is aware of that is required with the return of CHs and no other Parties have indicated that paperwork is required.

Solution development

Proposer discussions

The Proposer explained that they wanted to provide DCC Users with the ability to return CHs in bulk orders, but only using a single Service Request. SECAS and the Proposer agreed that the simplest solution would be to change the Service Requests that are used for processing the CH returns from DCC Users so that they can accept multiple Device IDs to achieve this. The Proposer stated that this method should not result in any impacts to a DCC User's systems.

Working Group discussions

The Working Group was supportive of the issue and Proposed Solution and did not provide any comments or suggested changes before issuing the Refinement Consultation.

Support for Change

The Refinement Consultation had four responses from Large Suppliers (none from other Party categories). Opinions were split with two Large Suppliers in favour and two against. The two Large Suppliers who supported the Modification Proposal believed the benefits presented by the Proposed

Solution outweighed its costs and that it improved the existing process of returning CHs. The two Large Suppliers who were not in favour of the Modification Proposal had differing rationale. One Large Supplier believed the Modification Proposal would improve the current process, but believed that the cost associated was too expensive for the benefit provided. The other Large Supplier believed that this Modification Proposal would not offer a material benefit.

The Refinement Consultation responses can be found in Annex D.

The Operations Group reviewed the Modification Proposal on 28 September 2020 and supported the request of the Impact Assessment when acknowledging that the Proposed Solution would be of interest and help resolve a logistical issue. The Operations Group has however not endorsed the Modification Proposal, instead wanting to see the Impact Assessment and the finished Proposed Solution and legal text before confirming their full support.

Views against the General SEC Objectives

Proposer's views

The Proposer believes the Modification Proposal better facilitates SEC Objective (a)¹ by improving the process of returning CH units and therefore providing efficiency gains for Suppliers.

Industry views

The Working Group stated no views on the SEC Objectives.

The responses provided in the Refinement Consultation were mixed, where two respondents stated they agreed that it better facilitates SEC Objective (a) and two respondents disagreed with this. Of the two respondents who disagreed, one believed there was no evidence to support this as they believe the functionality change will not provide any improvements to the CH returns process. The other believed it would detract from SEC Objective (a) by providing additional cost for no benefit.

Views against the consumer areas

The Modification Proposal is neutral against the majority of the following consumer areas. This is because the improvement being made would reduce time, effort and resources for a Supplier Party returning their CH units. This would not correspond to any improved or reduced quality of service or experience at the consumer level. To a minor degree, there would be a possible pass through of the SEC Modification cost to consumers, which would be a negative. However, the cost savings any Supplier makes in time, effort and resourcing could also be reflected in a pass through into reduced costs for consumers.

Improved safety and reliability

This area is neutral against the Modification Proposal.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Lower bills than would otherwise be the case

There could be a low net cost saving for consumers associated with this Modification Proposal. The cost of approving the Modification Proposal could be passed on to consumers, indicating an increased cost. However, the resource savings to the Supplier Parties benefitting from this change could negate this, and any savings could be passed on to the consumers. This would potentially provide a low-level cost saving for consumers.

Reduced environmental damage

This area is neutral against the Modification Proposal.

Improved quality of service

This area is neutral against the Modification Proposal.

Benefits for society as a whole

This area is neutral against the Modification Proposal.

Appendix 1: Progression timetable

SECAS received the Impact Assessment back from the DCC. The legal text has been drafted in line with the DUIS related changes in this assessment and is available for comment before the Modification Report is taken to Panel. The Modification Proposal will be taken back to the Operations Group and the Working Group for comment before being taken to Panel on 14 May 2021. It will then be issued for Modification Report Consultation and then to the Change Board for decision.

Timetable	
Event/Action	Date
Draft Proposal raised	18 Feb 2020
Presented to CSC initial comment	25 Feb 2020
Presented to CSC for final comment and recommendations	31 Mar 2020
Panel converts Draft Proposal to Modification Proposal	17 Apr 2020
Business requirements developed with DCC	20 Apr – 8 May 2020
Business requirements discussed with TABASC	4 Jun 2020
Preliminary Assessment requested	8 Jun 2020
Preliminary Assessment returned	3 Jul 2020
Modification discussed with Working Group	5 Aug 2020
Refinement Consultation	17 Aug – 7 Sep 2020
Refinement Consultation responses and Preliminary Assessment discussed with Operations Group	28 Sep 2020
Impact Assessment costs approved by Change Board	25 Nov 2020

Timetable	
Event/Action	Date
Impact Assessment requested	26 Nov 2020
Impact Assessment returned	12 Mar 2021
Modification discussed with Operations Group	6 Apr 2021
Modification discussed with Working Group	7 Apr 2021
Modification issued for Request for Information	23 Apr 2021 – 17 May 2021
Modification Report approved by Panel	18 Jun 2021
Modification Report Consultation	21 Jun 2021 – 9 Jul 2021
Change Board Vote	28 Jul 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
CH	Communications Hub
CHIMSM	Communications Hub Installation and Maintenance Support Materials
CSC	Change Sub-Committee
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
ECoS	Enduring Change of Supplier
GUID	Global Unique Identifier
PIT	Pre-integration Testing
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SM WAN	Smart Metering Wide Area Network
SR	Service Request
SSI	Self Service Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integration Testing
XML	Extensible Markup Language