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MP154 'CH Returns SLA Amendment'

June 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Holly Burton	SECAS
Harry Jones	SECAS
Bradley Baker	SECAS
Joe Hehir	SECAS
Kev Duddy	SECAS
Piers Garton	SECAS
Joey Manners	SECAS
Sasha Townsend	DCC
Remi Oluwabamise	DCC
Charlotte Semp	DCC
David Walsh	DCC
Abhijit Pal	DCC
Lynne Hargrave	Calvin Capital
Julie Geary	E.ON
David Lyons	E.ON
Alex Hurcombe	EDF Energy
Paul Saker	EDF Energy
Alastair Cobb	Landis + Gyr
Ralph Baxter	Octopus Energy
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Paul Fitzgerald	SSE
Gemma Slaney	WPD
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified, the Proposed Solution and intended next steps.

Working Group objectives:

- **Note** the issue, impacts and solution of the Modification Proposal
- **Note** the contents of the business requirements
- **Agree** the business requirements are suitable for Preliminary Assessment

Issue:

- During a Communications Hub lifecycle, the Device may end up being removed from a premise and returned to a warehouse. If so, then the unit will undergo the removal and returns process to be sent back.
- SEC Parties are obligated to notify the Data Communications Company (DCC) of returns of Communications Hubs and intended return within five Working Days of the date of removal using 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'.
- 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.

Proposed Solution:

SECAS (HJ) noted the proposed solution is to extend the five Working Day Service Level Agreement (SLA) to 15 Working Days. This has been explicitly included in the business requirements and, this will not increase the time of the overall returns process which is 90 Working Days.

Business Requirements:

SECAS (HJ) reiterated requirement 1 will look to extend the current Communications Hub returns SLA from five Working Days to 15 Working Days.

- The solution will amend the existing SLA for Communications Hub returns from five Working Days to 15. The DCC Systems will need to change any part of its process to accommodate the extension to the SLA so that Users aren't charged until the newly specified SLA time period elapses.
- The solution will only be used against extending the SLA to 15 Working Days for Service Request (SR) 8.14.3 'Communications Hub Status Update – Fault Return' and SR 8.14.4 'Communications Hub Status Update – No Fault Return'.

Working Group Discussion:

A Working Group member (PS) noted the impact on charging is the most important consideration as not being able to meet the SLA will have no direct penalty. Currently Parties are in fact charged until

the Communications Hub is returned. If a Party fails to return the Communications Hub within the SLA, anything that might have been a DCC responsibility (i.e., faults) becomes a User responsibility and would therefore would not be reported as a faulty Communications Hub resulting in associated charges. Unfortunately, this information is not clear therefore, it would be beneficial to make the charging methodology clear in the SEC. DCC (ST) noted the above statement is correct to an extent, however, it is highlighted in the SEC under SEC Section F 'Smart Metering System Requirements' and SEC Appendix I 'CH Installation and Maintenance Support Materials') that if Suppliers do not send Communications Hubs back within five Working Days, then it is the User responsibility if a fault is found as opposed to DCC.

A Working Group member (DL) feared there is a wider issue with this process as Suppliers will want to ensure penalties are missed for non-compliance. At this moment in time, E.ON are unable to retrieve Communications Hubs from their technicians to the warehouse through the triage process within a five day period due to logistics and backlog. Moving from five Working Days to 15 Working Days may not make a great deal of difference and so this means, E.ON could still end up using their same process which consists of getting technicians to send Service Requests. The impact of this for DCC is that the technician is choosing whether this is an 8.14.3 or 8.14.4 and theoretically are not best placed to make this judgement in case they get it wrong.

Another Working Group member (JG) agreed with the above statement in that Suppliers would not necessarily change their process on the basis of this change. It was further questioned why the determination about who is responsible is based on the number of days it takes for the Communications Hub to be returned. Whether a Communications Hub is faulty or not faulty should be based on factual evidence as to whether there is a fault with the Device or not. DCC (ST) noted this is a valid point and was not aware as to why this had been drafted into the SEC, it could potentially be something to do with the fault analysis reports and Communication Service Providers (CSPs) being able to unlock Communications Hubs with the SR. This will be fed back to DCC logistics to explain why this needs to be a time process in order to determine whether the Device is faulty or not. SECAS (JM) noted the understanding is to just notify the CSPs that a Device has been removed through fault or no fault, anything returned outside of the 90 days is considered a security risk.

One WG member (JG) was keen to re-emphasise the wider issue of responsibility of a Communications Hub unit, believing that faults could appear after five Working Days from the point of trying to install a Communications Hub unit. The Working Group member believed that it creates only a very small window for detecting an issue before returning the unit back to the DCC.

To Note:

Following the meeting, the DCC has stated it would be capped at offering 15 Working Days as the maximum extension to the Communications Hub Returns SLA. This is because of the way the existing 90 day returns process has been administered;

The 90 days start after the DCC receives either a SR 8.3 or a SR 8.14.3 to acknowledge the return(s). This means that the SLA adds time on top of the 90 days that is required to complete the Communications Hub returns process. The DCC has said it could extend it as far as 15 Working Days. It believes this "grace period" should be a good compromise between existing setups for Suppliers that operate on a five Working Day process for organising returns to issue to the DCC, and not extending the overall returns process length. With the suggested 30 Working Day SLA length, DCC has confirmed this would take the overall returns process to approximately 120 Working Days, which it believes would be unacceptable. This is due to the scope of the issue not being to change the overall length of the returns process, only extending the returns SLA at the start of the process.

Next Steps

The following actions were recorded from the meeting:

- DCC (ST) seek clarification as to why a time process is needed to establish whether a Device is faulty or not and what the impact would be on the DCC if the wrong Service Request was issued.
- SECAS to request a DCC Preliminary Assessment.