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SECMP0024 'Enduring Approach to Communication Hub Firmware Management'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the SECMP0024 Refinement Consultation.

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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	On the basis that this is a similar solution to that offered under the SMETS1 E&A programme. Suppliers can already ascertain the current version of the comms Hubs using the SMI extract, however the alert being proposed in SECMP0024 means that Supplier could have real time view of the assets as the alert is received - rather than downloading a report periodically.
EDF Energy	Large Supplier	Yes	We are generally Supportive of the proposed changes for a new DCC N63 alert when the Comms Hub firmware has been successfully upgraded. It is unclear from the Modification report whether Suppliers also will get an alert when the firmware OTA is initiated / attempted. This has been identified as an issue in the circumstances of a simultaneous attempt to upgrade meter firmware OTA and at the same time when the associated Comms Hub firmware is downloading. This can impact the success of the meter OTA. The issue could have been avoided if we had been aware of the Comms Hub upgrade. We could have delayed the meter OTA and reduced meter OTA failure rates as a consequence. We consider that the introduction of a Comms hub OTA notification would be beneficial to the end-to-end process.
E.ON	Large Supplier	Yes	The solution provides the Suppliers with visibility of new comms hub firmware deployment, in its governance before production release and also as the firmware is deployed by the DCC/CSPs.

Question 2: Will there be any impact on your organisation to implement SECMP0024?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	System changes will be needed to factor the new alert and process it accordingly. The benefits for this outweigh the costs that will be incurred.
EDF Energy	Large Supplier	Yes	The solution proposes a new DCC N63 alert when the Comms Hub firmware has been successfully upgraded. This will help us to understand when new firmware has been updated and allow us to maintain devices details appropriately.
E.ON	Large Supplier	Yes	To reap the benefits of the SEC Mod, effort would be required to process the new alert and update backend asset databases with the information from those alerts.

Question 3: Will your organisation incur any costs in implementing SECMP0024?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	See question 2.
EDF Energy	Large Supplier	Yes	EDF will need to update our systems and business process to utilise the DCC alert generated for each firmware activation and automatically update the firmware versions of Comms Hub's in our systems. We will be able to process the alert but require changes will be required as the new firmware version would be included in the payload of the alert. There would be a cost to us to automatically process this info from the alert payload to update our back office systems to record the active firmware version on each Comms Hub. This cost has not yet been fully assessed.
E.ON	Large Supplier	Yes	Effort and costs are not available at this time, however they are thought to be relatively small compared to overall budgets. Cost savings are difficult to calculate. However, the alternative of not having accurate and quick access to a customer's comms hub firmware version can lead to poor customer service, longer customer contact times and inefficient asset deployment planning.

Question 4: Do you believe that SECMP0024 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	As set out in the Modification Report.
EDF Energy	Large Supplier	Yes	The proposed change will better facilitate SEC Objective (a). The provision of a Comms Hub firmware update framework that is coordinated, controlled and transparent to the relevant parties will facilitate the efficient provision, installation, and operation and interoperability of Smart Metering Systems at Energy Consumers' premises within Great Britain.
E.ON	Large Supplier	Yes	The SEC Mod will facilitate the efficient operation and interoperability of Smart Metering Systems at Consumer's premises by providing Suppliers up to date information on the firmware version within the comms hub at the customer's premise. It will also allow the DCC to efficiently discharge their obligations imposed upon it by the DCC Licence which states: 5.9 The First Enduring General Objective of the Licensee is to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code.

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0024 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	Yes although we are still waiting to see the Policy document from the DCC that is required for the whole solution to work.
EDF Energy	Large Supplier	Yes	The proposed changes for a new DCC N63 alert when the Comms Hub firmware has been successfully upgraded will improve Suppliers ability to manage and record the accurate firmware version of comms hubs at premises they supply.
E.ON	Large Supplier	Yes	Costs of DCC/CSP implementation are relatively small (as per the DCC PIA document). Individual costs to the Supplier are not compulsory. Costs will be incurred only if the Supplier wishes to take advantage of the new alert to better serve customers.

Question 6: How long from the point of approval would your organisation need to implement SECMP0024?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	6 months	We'd need to update our system to accept and recognise the new alert. We cannot give a view on any changes that may be revealed from understanding the Policy view from the DCC and any changes that may bring.
EDF Energy	Large Supplier	6 months	We would require a minimum of 6 months to update our back office systems for this change.
E.ON	Large Supplier	Estimated 6-12 months from SEC Mod approval to factor into the IT program of work.	Processing of the new alert and storage into back end databases may require an IT architecture work.

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

Question 7			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	-
EDF Energy	Large Supplier	Yes	We agree with the proposed implementation approach
E.ON	Large Supplier	Yes	The proposed solution is straight forward and relatively inexpensive compared to the provided benefits.

Question 8: Do you agree that the legal text will deliver SECMP0024?

Question 8			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	-
EDF Energy	Large Supplier	Yes	We have no comments on the legal text.
E.ON	Large Supplier	Yes	There are no obvious errors

Question 9: Do you believe there will be any impacts on or benefits to consumers if SECMP0024 is implemented?

Question 9			
Respondent	**Category**	**Response**	**Rationale**
OVO Energy	Large Supplier	Yes	SECMP0024 will enable the Responsible Supplier to update the CH in the overall metering systems to reflect the latest firmware version on the asset in a timely manner and not have to rely on periodically downloading SMI. This should support more effective asset management and firmware updates, where these updates are reliant on the corresponding CH firmware. The estate being on the latest compliant firmware will benefit consumers being able to enjoy full functionality.
EDF Energy	Large Supplier	Yes	Consumers could benefit from the implementation of this modification as the firmware of their connected comms hubs is more successfully managed and kept up to date. This may be important to overcome any security or technical issues found. It could improve the performance of their smart metering system.
E.ON	Large Supplier	Yes	On customer contact, the call agent would have instant access to the comms hub firmware version to check against known issues. From within a consumer's home, a Meter Technician contact with the Supplier's Technical Help Desk would have instant access to the comms hub firmware version to check against known issues and incompatibilities. A Supplier can better plan a customer's asset upgrade program of work knowing the exact Comms Hub firmware version within its IT databases.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	**Category**	**Comments**
OVO Energy	Large Supplier	-
EDF Energy	Large Supplier	No further comments
E.ON	Large Supplier	Cost savings should be possible by integrating this SEC Mod implementation with other changes.