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# MP121

## ‘Commissioning non-commissioned Devices after CoS’

### Modification Report

Version 1.0

31 August 2021

Corporate member of  
Plain English Campaign  
Committed to clearer  
communication

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## About this document

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This document is a Modification Report. It sets out the background, issue, solution, impacts, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

## Contents

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1. Summary.....	3
2. Issue.....	3
3. Solution .....	4
4. Impacts .....	5
5. Costs .....	6
6. Implementation approach .....	7
7. Assessment of the proposal .....	7
Appendix 1: Progression timetable .....	11
Appendix 2: Glossary .....	11

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) Preliminary Impact Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation.

## Contact

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

**Kev Duddy**

020 3574 8863

[kev.duddy@gemserv.com](mailto:kev.duddy@gemserv.com)

## 1. Summary

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This proposal has been raised by Paul Saker from EDF Energy.

There are instances where Smart Metering Equipment Technical Specifications (SMETS) 2 Devices have been installed but not commissioned. This is due to premises not having Smart Meter Wide Area Network (SM WAN) coverage when the Device was installed. In the case of no SM WAN coverage, the DCC has 90 days to address the WAN connectivity. In this timespan, it is possible that the Consumer could request a Change of Supplier (CoS) which will result in the Consumer not receiving smart services from their installed Device as the new Supplier will not have the install Code.

The Proposed Solution is to place an obligation in the SEC that requires an installing Supplier of a Device to provide the install code to the gaining Supplier. within ten Working Days (WD), relying on Suppliers to complete this task via email correspondence

An automated solution delivered via the DCC Self-Service Interface (SSI) was investigated. Respondents to the Refinement Consultation and subsequent discussions at the Working Group highlighted that this automated solution did not meet the needs of SEC Parties. Therefore, the Proposer has chosen to progress a solution which does not impact the SSI and instead uses email. Furthermore, the Working Group has chosen not to progress the SSI Solution as an Alternative Solution based on the lack of support for the SSI solution.

The Proposed Solution will impact Large Suppliers and Small Suppliers. There would be no system costs associated and if approved under Self-Governance it will be implemented in the February 2022 Release.

## 2. Issue

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### What are the current arrangements?

Currently Suppliers are required to check if there is SM WAN coverage before attending a premise to install a SMETS2 Device. Situations can arise where a SMETS2 Device is installed but not commissioned. This can happen where the DCC WAN Coverage Database indicates that there will be WAN coverage to the premises but on arrival there is no coverage (known as 'reactive install and leave'), or where a smart meter needs to be installed but there is no current WAN coverage to the premises (known as 'proactive install and leave'). In these cases, Suppliers are required to install the Devices, including a Communications Hub (CH) in a non-commissioned state, and then commission the CH once a WAN connection has been established.

The processes and obligations relating to the commissioning of Devices, as well as 'install and leave', are set out in the SEC, including, SEC Section F7 'Installation and Maintenance of SMETS2+ Communications Hubs' and SEC Appendix I 'CH Installation and Maintenance Support Materials' where it is referred to as the 'CH No SM WAN Installation Procedure'.

### What is the issue?

The DCC has a 90-day target to resolve WAN connectivity to 'reactive install and leave' installations. The time taken to establish WAN connectivity to 'proactive install and leave' installations is likely to be

even longer. These ‘install and leave’ processes and associated obligations are included in the energy Supply Licences. In addition, Condition 49 ‘Smart Metering Systems and In-Home Displays – Operational Requirements’ (Condition 43 for gas) requires Suppliers to ensure their Devices can communicate with the DCC once WAN is available.

As a result of these timescales there is a risk that the Consumer will change their energy Supplier before WAN connectivity has been established. In these circumstances the gaining Supplier is not currently able to commission the installed Devices. This is because it requires the install code to enable the installed Devices to be joined to the Home Area Network (HAN) (using Service Reference Variant (SRV) 8.11), which needs to occur before the Devices can be commissioned.

On some new build developments, Independent Gas Transporters (IGTs) are responsible for the Gas Smart Metering Equipment (GSME) installations, but these are left not commissioned as the Electricity Smart Metering Equipment (ESME) is not installed at the same time. This can lead to issues when a Supplier is unable to commission them later.

In summary, there is no process for a SEC Party to commission an installed meter where they did not complete the installation.

### What is the impact this is having?

The impact of this issue is that consumers who change Supplier before their SMETS2 Devices can be commissioned will not be able to receive smart services from their meter. There is a significant risk that these non-commissioned Devices will be removed or replaced, which not only causes inconvenience to consumers but will incur a significant cost in terms of unnecessary site visits and stranded SMETS2 Devices.

It would therefore make sense that the process to enable Devices to be commissioned as a result of a ‘No SM WAN Installation’, and any obligations on Parties required to enable that process to work, should be set out in the SEC.

### Impact on consumers

Consumers that have Devices in a non-commissioned state currently need a replacement in order to receive smart services causing them inconvenience.

## 3. Solution

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### Proposed Solution

The Proposed Solution is to make Device install codes available to gaining Suppliers of uncommissioned Devices, which prevents the Supplier having to replace the Device in order to provide smart functionality to the newly gained customer.

The Proposed Solution places an obligation on the losing Supplier to respond to a request within ten working days. The losing Supplier will then be obliged to respond by providing the correct install code if they were the installing Supplier, or confirming that they were not the installing Party.

The business requirements for this 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

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers		Meter Installers
	Device Manufacturers		Flexibility Providers
✓	Meter Asset Providers		Other

This modification will impact Suppliers, as when a gaining Supplier gains a Device that is uncommissioned, they will be able to email the losing Supplier in order to acquire the install code for that Device. The losing Supplier will then be obliged to respond by providing the correct install code if they were the installing Supplier, or confirming that they were not the installing Party.

The impacts on Other SEC Parties are limited to Meter Asset Providers, as this should reduce the number of meters being removed and therefore reduce costs and minimise waste of meter disposal.

### DCC System

The Proposed Solution will not impact DCC systems.

The full impacts based on investigating an automated solution on DCC Systems and DCC's proposed testing approach can be found in the DCC Preliminary Assessment response in Annex C.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix AC 'Inventory Enrolment and Decommissioning Procedures'

The changes to the SEC required to deliver the proposed solution can be found in Annex B.

### Technical specification versions

There will be no changes to the technical specifications as a result of this modification.

### Consumers

This modification will benefit the consumer experience. Making the relevant Device install code available will prevent uncommissioned Devices from being removed from consumers' premises and being replaced with new Devices in order to gain smart functionality.

### Other industry Codes

This modification will have no impact on other industry Codes.

### Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

## 5. Costs

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### DCC costs

There are no costs for the DCC to implement the Proposed Solution.

### SECAS costs

The estimated SECAS implementation costs to implement this modification is two day 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.
- Updating the operational contacts list and ensuring it is populated accordingly

### SEC Party costs

Supplier Parties noted that any new process involves costs to set up and costs depend on that organisation and how automated they wished to develop their internal process. Two Supplier Parties also noted that they would expect cost savings from each premises at which they did not have to exchange a meter.

Responses from Other SEC Parties indicated that there would be no costs to their organisations. One Party noted that it would realise cost savings as a result of fewer removals, which includes its logistic and disposal costs for meters not able to be reinstalled.

## 6. Implementation approach

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### Recommended implementation approach

SECAS is recommending an implementation date of:

- **24 February 2022** (February 2022 SEC Release) if a decision to approve is received on or before 21 November 2022; or
- **30 June 2022** (June 2022 SEC Release) if a decision to approve is received after 21 November 2022 but on or before 30 March 2022.

There are no impacts on the DCC System. In the Refinement Consultation (Annex D) SEC Parties indicated they would need three months preparation for the new obligation to begin. This would enable new processes to be put in place and enable Parties to reduce the backlog of affected meters before the obligation is in place. Therefore the February 2022 SEC Release is the next SEC Release that this solution can be targeted for.

## 7. Assessment of the proposal

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### Observations on the issue

The proposal was presented to the Change Sub-Committee (CSC) for recommendation. The CSC agreed that this was a genuine issue, and the Proposer commented further saying that there were a reasonable number of SMETS2 meters they were gaining that did not have smart functionality because of this issue. The CSC agreed that the issue was well defined, and all members recommended that it should progress to the Refinement Process.

The proposal was also taken to each Sub-Committee for initial comment. Each Sub-Committee was supportive of the proposal.

The views of a SEC Party were also received during the Development Stage. They commented that there is also a need to consider Supplier certificates and Device factory configuration when developing a solution to the identified issue. The Proposer notes that this modification is not seeking to cover all eventualities that could occur. However, it should encompass any situation where the gaining Supplier only requires the install code in order to Commission the meter.

### Scale of the issue

In the Proposer's experience, around 3% of smart meters gained from another Supplier are in a non-commissioned state. They require install codes to be provided in order for the existing Devices to be commissioned and gain smart functionality. They also believed that a similar percentage (3%) of smart meters that switch away to other Suppliers are in a non-commissioned state. In these cases the gaining Supplier would require the install codes from the Proposer.

The Refinement Consultation responses contained a wide range of responses to this question. One Supplier indicated a top end estimate of 45% of meters in this state that switch to its portfolio.

During the Working Group's discussions a member stated that the Department for Business, Energy and Industrial Strategy (BEIS) has been conducting work in this area and estimated that there are



approximately 500,000 SMETS2 meters sat in a non-commissioned status. However, a Working Group member confirmed that this number included Devices in a genuine pending state and the actual number affected by this issue was much lower. SECAS also confirmed that BEIS had advised it of this. It was understood that until a solution is implemented the number of affected Devices will continue to grow.

## **Solution development**

### **Automated solution**

An automated solution was initially developed between the Proposer, SECAS and the DCC. It was discussed that to commission a Device, the Supplier must obtain the install code for that specific Device. This is held by the installing Supplier and is usually received at manufacture or on delivery. It was agreed that the most secure method of exchanging an install code would be by using the DCC SSI. The SSI is a web-based portal which allows Users to obtain information about, and interact with, DCC Services. It had been agreed that in the case where a Supplier gains a Type 1 Device that has been installed but without connecting to the SM WAN, the Supplier would be able to raise an incident via the DCC SSI. The installing Supplier would be notified of the incident and must respond with the install code for that specific Device. The obligation for the installing Supplier to respond to the SSI incident would then be codified into the SEC.

This would provide a secure communication mechanism that would pose minimal risk to the security model. An automated solution would have the benefit of being fully trackable to identify when Parties were not meeting any new obligation. This oversight would make it easier to enforce any legal text changes.

However, the Working Group believed that the automated solution that had been investigated was not fit for purpose. It highlighted that it would be difficult for Parties to automate a process internally to accommodate this solution. It also noted that the requirement to log an individual request for each install code was not workable. Members raised concern over having to raise individual incidents via the SSI as this would mean there could potentially be hundreds of thousands of new SSI incidents to be raised to deal with the current number of meters affected.

The detail of DCC costs and timelines that have been initially provided with the automated solution can be found in the DCC Preliminary Assessment in Annex C.

### **Email solution**

Some Working Group members advised that they had been emailing other Suppliers to obtain install codes. They noted that the success of this process was highly dependent on the willingness of the installing Supplier to respond and provide install codes.

An email solution would enable the Supplier to make requests to other Suppliers in bulk, albeit that would rely on the Supplier being able to accurately identify which Party is the installing Supplier, as there could be multiple changes of supply.

SECAS currently maintains a list of SEC Party operational contacts, and this could be expanded to include designated contacts for this process. This solution would also be able to be implemented sooner than an automated solution as there would be no impact on DCC's systems, which would also remove DCC implementation costs.



The Proposer determined that the email solution should be taken forward as the Proposed Solution. The Working Group noted the comments that had been raised around the automated solution and concluded not to take that forward as an Alternative Solution.

### **Service Level Agreement (SLA)**

The initial SLA proposed for a Supplier to respond to a request for install code was a five WD SLA in the legal text. The Refinement Consultation responses indicated that Parties felt this was too tight a turnaround time. The Proposer suggested raising this to ten WDs. Two Working Group members felt that they could not agree on an SLA without knowing what the solution is. A Working Group member highlighted that any SLA should not apply to the large backlog of install codes that needed to be resolved.

The implementation timescale for this modification is approximately three months. The Proposer believes this gives Parties enough time to begin work on clearing the backlog before the obligation will be implemented into the SEC. SECAS would begin collating contact details for operational contacts from the time of decision to maximise the time for SEC Parties to work on the backlog.

### **Escalation route**

Respondents to the Refinement Consultation noted that the legal text did not include an escalation route in situations where Suppliers were not responding and would therefore be in breach of the SEC. SECAS believed that any failed obligation would follow the same process within the SEC and does not need to be defined. SECAS currently maintains a list of SEC Party operational contacts and this would be expanded to include designated contacts for this process and appropriate escalation contacts as well within an organisation.

## **Support for Change**

### **Working Group**

A Working Group member highlighted that although it may not be the most desirable solution, there is no other way of acquiring the installation code other than from the installing Supplier. However, the Working Group agreed that it is not particularly difficult to provide the install code and that this would ultimately benefit Suppliers as well as Consumers. It was discussed that there is no alternative other than removing the meter, which requires significantly more effort and cost than providing the install code.

The Working Group highlighted that although an automated solution does appear expensive, the higher end costs provided by the DCC would translate to a more cost-effective proposition than a site visit to each property.

A Working Group member advised that the legal text must explicitly state that the 'installing Supplier' must provide the install code for clarity. SECAS acknowledged this noting that the new obligation would be included in SEC Appendix AC 'Inventory, Enrolment and Decommissioning Procedures'.

### **Refinement Consultation**

The respondents were unanimous that the solution put forward was suitable and should be approved.

Respondents broadly agreed that the legal text delivered the intended solutions, but some Parties reiterated their concern that there was no escalation route noted in the legal text.

## **Views against the General SEC Objectives**

### **Proposer's views**

The Proposer believes that this modification will better facilitate SEC Objectives (a) and (c) as the consumers at premises affected by this issue do not have access to the benefits of smart metering as the Devices at these premises are not providing smart functionality.

### **Industry views**

The responses to the Refinement Consultations all indicated agreement with the Proposer's assessment. This view was shared by Working Group members.

## **Views against the consumer areas**

### **Improved safety and reliability**

If implemented, this modification will have a neutral impact against this consumer area.

### **Lower bills than would otherwise be the case**

If implemented, this modification could have a positive impact against this consumer area as more consumers will have access to the smart functionality of their meters.

### **Reduced environmental damage**

If implemented, this modification will have a positive impact against this consumer area as it will not be necessary to exchange the Devices affected that are already at consumer premises.

### **Improved quality of service**

If implemented, this modification will have a positive impact against this consumer area as consumers will have access to smart functionality without the need for a site visit to exchange the Device.

### **Benefits for society as a whole**

If implemented, this modification will have a neutral impact against this consumer area.

## Appendix 1: Progression timetable

The Modification Report will be presented to the CSC on 31 August 2021 and then issued for Modification Report Consultation. It will then be presented to the Change Board for vote on 29 September 2021 under Self-Governance.

Timetable	
Event/Action	Date
Draft Proposal raised	24 Mar 2020
Presented to CSC for final comment and recommendations	28 Apr 2020
Panel converts Draft Proposal to Modification Proposal	15 May 2020
Business requirements developed with Proposer	May – Jun 2020
Modification discussed with Working Group	1 Jul 2020
Preliminary Assessment requested	12 April 2021
Preliminary Assessment returned	13 May 2021
Modification discussed with Working Group	2 June 2021
Refinement Consultation	11 Jun 2021 – 2 Jul 2021
Discussed with Working Group	4 Aug 2021
Modification Report approved by CSC	31 Aug 2021
Modification Report Consultation	1 Sep – 20 Sep 2021
Change Board vote	29 Sep 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
BEIS	Department of Business, Energy & Industrial Strategy
CH	Communications Hub
CoS	Change of Supplier
CSC	Change Sub-Committee
DCC	Data Communications Company
ESME	Electricity Smart Metering Equipment
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
IGT	Independent Gas Transporter
OPSG	Operations Group
SEC	Smart Energy Code

Glossary	
Acronym	Full term
SECAS	Smart Energy Code Administrator and Secretariat
SLA	Service Level Agreement
SM	Smart Meter
SMETS	Smart Metering Equipment Technical Specifications
SRV	Service Reference Variant
SSI	Self-Service Interface
WAN	Wide Area Network
WD	Working Day

# MP121 ‘Commissioning non-commissioned Devices after CoS’

## Annex A

### Business requirements – version 1.0

#### About this document

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This document contains the business requirements that support the solution(s) for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

## 1. Business requirements

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This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	Install codes to be made available via Self-Service Interface (SSI).
2	The gaining Supplier logs an incident on SSI as part of the incident management process.
3	The installing Supplier is notified of raised incident.
4	The gaining Supplier has the authority to close incident.
5	The installing Supplier is obliged to respond to the incident.

## 2. Considerations and assumptions

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This section contains the considerations and assumptions for each business requirement.

### 2.1 Requirement 1: Install codes to be made available via Self-Service Interface (SSI).

The installing Supplier will make the install code of the switching Consumer's smart metering equipment available via the SSI. The SSI provides a secure mechanism for sharing data.

### 2.2 Requirement 2: The gaining Supplier logs an incident on SSI as part of the incident management process.

In order to provide smart functionality to the Consumer, the gaining Supplier must obtain the install code from the installing Supplier who installed the smart metering equipment. This will be actioned by the gaining Supplier logging an incident on SSI through the incident management process.

### 2.3 Requirement 3: The installing Supplier is notified of raised incident.

Once the gaining Supplier has logged the incident on SSI, a notification will be sent to the installing Supplier. The installing Supplier will then respond to the incident by making the install code available to the gaining Supplier via SSI.

### 2.4 Requirement 4: The gaining Supplier has the authority to close incident.

Once the gaining Supplier has received a response from the installing Supplier, they will verify the install code for the smart metering equipment at the given premises. Once smart functionality has been obtained, the gaining Supplier will close the incident on SSI. Only the gaining Supplier will have the authority to do close the incident.

## 2.5 Requirement 5: The installing Supplier is obliged to respond to the incident.

An obligation is to be included within the SEC for installing Suppliers to respond to the incident. If the installing Supplier fails to respond, the gaining Supplier would need to replace the current smart metering equipment or leave the Consumer without smart functionality.

## 3. Glossary

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This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
SSI	Self-Service Interface



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# MP121 ‘Commissioning non-commissioned Devices after CoS’

## Annex B

### Legal text – version 1.0

#### About this document

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This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

## Appendix AC 'Inventory Enrolment and Decommissioning Procedures'

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These changes have been redlined against Appendix AC version 3.0.

### Add a new Clause 4.16 to Appendix AC as follows:

#### **Commissioning of Devices other than Communications Hub Functions**

- 4.9 Where a Responsible Supplier wishes to Commission a Type 1 Device, it shall send (under Clause 4.5) a 'Join Service' Service Request to add the Type 1 Device to the Device Log of a Commissioned Electricity Smart Meter, a Commissioned Standalone Auxiliary Proportional Controller or a Commissioned Gas Proxy Function (as applicable).
- 4.10 Where a Responsible Supplier wishes to Commission a Gas Proxy Function, it shall send (under Clause 4.5) a 'Join Service' Service Request to add the Gas Proxy Function to the Device Log of a Commissioned Gas Smart Meter.
- 4.11 Where a Responsible Supplier wishes to Commission a Smart Meter, the Responsible Supplier shall send the DCC a 'Commission Device' Service Request in respect of that Smart Meter.
- 4.12 The DCC shall not send a Command to a Smart Meter in response to a Service Request under Clause 4.11 where:
- (a) the Smart Meter is not listed within the Smart Metering Inventory;
  - (b) the Smart Meter has an SMI Status of 'commissioned', 'decommissioned' or 'suspended'; and/or
  - (c) the Communications Hub Function that is to form part of the same Smart Metering System is not listed in the Smart Metering Inventory with an SMI Status of 'commissioned'.
- 4.13 Following the receipt of a Response, over the SM WAN, that indicates the Successful Execution of a 'Commission Device' Service Request in accordance with Clauses 4.11 and 4.12 in respect of a Device, the DCC shall update the SMI Status of the Device to 'commissioned'.
- 4.14 In respect of SMETS2+ Devices only, as soon as reasonably practicable after the Successful Execution of a 'Commission Device' Service Request which relates to a Smart Meter, the Responsible Supplier shall send a 'Set Device Configuration (Import

MPxN)' Service Request to ensure that the relevant MPAN or MPRN (as applicable) is available for display upon the Smart Meter.

4.15 For the avoidance of doubt, there is no concept of commissioning a Type 2 Device.

4.16 Where, following the fitting and activation procedure, the installing Supplier Party wishes to leave a Type 1 Device installed without establishing a connection to the SM WAN, then following any subsequent change of supplier:

- (a) the gaining Supplier Party may contact the losing Supplier Party (and/or one or more former suppliers) by email requesting the installation code for the Type 1 Device; and
- (b) the installing Supplier Party shall, within ten (10) Working Days of receiving such a request, provide the relevant installation code to the gaining Supplier Party by email (or, if the Supplier Party which is contacted is not the installing Supplier Party, confirm the same to the gaining Supplier Party by email).

# **SEC Modification Proposal, SECMP0121, DCC CR4280**

**Commissioning non-commissioned Devices after  
Change of Supplier (CoS)**

**Preliminary Impact Assessment (PIA)**

<b>Version:</b>	<b>0.2</b>
<b>Date:</b>	<b>12<sup>th</sup> May, 2021</b>
<b>Author:</b>	<b>DCC</b>
<b>Classification:</b>	<b>DCC PUBLIC</b>

## Contents

<b>1</b>	<b>Executive Summary .....</b>	<b>3</b>
<b>2</b>	<b>Document History .....</b>	<b>4</b>
2.1	Revision History .....	4
2.2	Associated Documents .....	4
2.3	Document Information.....	4
<b>3</b>	<b>Context and Requirements.....</b>	<b>5</b>
3.1	Problem Statement .....	5
3.2	Business Requirements .....	5
3.2.1	Requirement 1: Install codes to be made available via Self-Service Interface (SSI) .....	6
3.2.2	Requirement 2: The gaining Supplier logs an incident on SSI as part of the incident management process .....	6
3.2.3	Requirement 3: The installing Supplier is notified of raised incident .....	6
3.2.4	Requirement 4: The gaining Supplier has the authority to close incident.....	6
3.2.5	Requirement 5: The installing Supplier is obliged to respond to the incident.....	6
3.3	Scope.....	6
<b>4</b>	<b>Description of Solution .....</b>	<b>7</b>
4.1	SSI Changes.....	7
4.2	DCC Service Management System Changes .....	7
4.3	Data Management .....	7
4.4	Security Impact .....	8
4.5	Technical Specifications and Documentation .....	8
4.6	Infrastructure Impact .....	8
4.7	Integration Impact.....	8
4.8	Application Support.....	8
4.9	Service Impact .....	8
<b>5</b>	<b>Implementation Timescales and Approach.....</b>	<b>9</b>
<b>6</b>	<b>Costs and Charges.....</b>	<b>9</b>
	<b>Appendix A: Glossary .....</b>	<b>10</b>

## 1 Executive Summary

Situations can arise where a SMETS2 Device is installed but not commissioned, and a Consumer could request a Change of Supplier (CoS) which will result in the Consumer not receiving smart services from their installed Device as the new Supplier does not have the Device Install Code. SECMP0121 proposes changes via the DCC Self-Service Interface (SSI) to allow the installing Supplier of a Device to provide the install code to a gaining Supplier within five Working Days.

The Change Board are asked to approve the following options for Full Impact Assessment:

- Total cost to complete the Full Impact Assessment of £10,762
- A timescale to complete the Full Impact Assessment of 30 working days
- ROM costs for SECMP0121, up to the end of Pre-Integration Testing (PIT) of between £150,000 and £350,000

### Benefits

Currently there is no process for a SEC Party to commission an installed meter where they did not complete the installation. Consumers who change Supplier before their SMETS2 Devices can be commissioned will not be able to receive smart services from their meter. There is a large risk that these non-commissioned Devices will be removed or replaced, which not only causes inconvenience to Consumers but will incur a significant cost in terms of unnecessary site visits and stranded SMETS2 Devices. Implementing this Modification would provide a simple and secure method to prevent this situation arising with significant associated benefits to gaining suppliers and Consumers.

## 2 Document History

### 2.1 Revision History

Revision Date	Revision	Summary of Changes
12/05/2021	0.2	Initial version, DCC and DSP review

### 2.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Filename	Source	Issue Date
1	MP121 business requirements v0.2	SECAS	07/04/2021
2	MP121 Modification Report v0.6	SECAS	07/04/2021

References are shown in this format, [1].

### 2.3 Document Information

The Proposer for this Modification is Paul Saker of EDF. The original proposal was submitted on 24<sup>th</sup> August 2020.

The Preliminary Impact Assessment was requested of DCC on 24<sup>th</sup> March 2021.

The terms "Device Install Code" and "Install Codes" have the same meaning and are used interchangeably throughout this document.



### 3 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The problem statement and requirements have been provided by SECAS and the Proposer.

#### 3.1 Problem Statement

Suppliers are required to check if there is SM WAN coverage before attending a premises to install a SMETS2 Device. Situations can arise where a SMETS2 Device is installed but not commissioned. This can happen where the DCC WAN Coverage Database indicates that there will be WAN coverage to the premises but on arrival there is no coverage (known as 'reactive install and leave'), or where a smart meter needs to be installed but there is no current WAN coverage to the premises (known as 'proactive install and leave'). In these cases, Suppliers are required to install the Devices including a Communications Hub (CH), in a non-commissioned state, and then commission the CH once a WAN connection has been established.

In the case of no SM WAN coverage, the DCC has 90 days to address the WAN connectivity. In this time, a Consumer could request a Change of Supplier (CoS) which will result in the Consumer not receiving smart services from their installed Device as the new Supplier will not have the Device Install Code<sup>1</sup>.

In summary, there is no process for a SEC Party to commission an installed meter where they did not complete the installation. There is a risk that these non-commissioned Devices will be removed or replaced, which not only causes inconvenience to Consumers but will incur a significant cost in terms of unnecessary site visits and stranded SMETS2 Devices.

The Proposed Solution is to place an obligation in the Smart Energy Code (SEC) that requires an installing Supplier of a Device to provide the install code to the gaining Supplier via the DCC Self-Service Interface (SSI) within five Working Days.

#### 3.2 Business Requirements

This section contains the considerations and assumptions for each business requirement.

Req.	Requirement
1	Install codes to be made available via Self-Service Interface (SSI).
2	The gaining Supplier logs an incident on SSI as part of the incident management process.
3	The installing Supplier is notified of raised incident.
4	The gaining Supplier has the authority to close incident.
5	The installing Supplier is obliged to respond to the incident.

*Table 1: Business Requirements for SECMP0121, CR4280*

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<sup>1</sup> This is commonly referred to as "Install Code", and has the same meaning.

### **3.2.1 Requirement 1: Install codes to be made available via Self-Service Interface (SSI)**

The installing Supplier will make the install code of the switching Consumer's smart metering equipment available via the SSI. The SSI provides a secure mechanism for sharing data.

### **3.2.2 Requirement 2: The gaining Supplier logs an incident on SSI as part of the incident management process**

In order to provide smart functionality to the Consumer, the gaining Supplier must obtain the install code from the installing Supplier who installed the smart metering equipment. This will be actioned by the gaining Supplier logging an incident on SSI through the incident management process.

### **3.2.3 Requirement 3: The installing Supplier is notified of raised incident**

Once the gaining Supplier has logged the incident on SSI, a notification will be sent to the installing Supplier. The installing Supplier will then respond to the incident by making the install code available to the gaining Supplier via SSI.

### **3.2.4 Requirement 4: The gaining Supplier has the authority to close incident**

Once the gaining Supplier has received a response from the installing Supplier, they will verify the install code for the smart metering equipment at the given premises. Once smart functionality has been obtained, the gaining Supplier will close the incident on SSI. Only the gaining Supplier will have the authority to do close the incident.

### **3.2.5 Requirement 5: The installing Supplier is obliged to respond to the incident**

An obligation is to be included within the SEC for installing Suppliers to respond to the incident. If the installing Supplier fails to respond, the gaining Supplier would need to replace the current smart metering equipment or leave the Consumer without smart functionality.

## **3.3 Scope**

It has been agreed by the Working Group and Proposer that in the case where a Supplier gains a Type 1 Device that has been installed without connecting to the SM WAN, the Supplier will be able to raise an incident via the DCC SSI, which the installing Supplier will be notified of and must respond to within five Working Days with the install code for that specific Device. The obligation for the installing Supplier to respond to the SSI incident within five Working Days will be codified into the SEC.

## 4 Description of Solution

The objective of this Modification is to provide a mechanism within SSI to make Device Install Codes available to gaining Suppliers of non-commissioned Devices.

Although not stated in the business requirements, in addition to the above, the DCC Service Management System (DSMS) is required to automatically assign the incident to the installing Supplier.

The DSP will introduce a new incident type to be used by the gaining Supplier for the purpose of creating the incident to request the Install Code. At the time of the incident creation SSI will mandate the entry of the Device ID for which the Install Code has been requested. SSI will then request DCC Total System to check the existence of the Device ID within the Smart Metering Inventory (SMI) and that the Device is in an appropriate state (to be agreed as part of the FIA), before passing the details to DSMS for creating the incident. It should be noted that SSI and DSP cannot establish whether the creator of the incident is the valid Supplier to the Device as the association information may not be available within DSP by then.

In order to allocate the incident automatically, DSMS will need to know the User ID of the installing Supplier from the DCC Total System. DCC Data Systems will determine the installing Supplier based on who has pre-notified the Device. DSMS will send a notification email to the installing Supplier indicating that an incident of type 'Request for Install Code' has been raised for them to take action.

The installing Supplier can then add the Install Code to the incident by way of a note. The installing Supplier will not be able to allocate the incident back to the gaining Supplier as DSMS does not allow a Service User to allocate an incident to another Service User. Such allocations need to be managed ordinarily by DCC Helpdesk. In case of an incident of type 'Request for Install Code', DSMS will send an email notification to the creator of the incident whenever an update is made to the incident by another Service User. It shall be noted that DSMS will not be able to verify whether the notes added by the installing Supplier contains an Install Code and the notification will be sent regardless.

On receipt of the notification email, the gaining Supplier may access the incident via SSI and close the incident if the Install Code has been received.

### 4.1 SSI Changes

SSI changes are required to support the new incident type with a Service Request Definition (SRD). SSI will also need to check if the supplied Device ID exists within the SMI.

### 4.2 DCC Service Management System Changes

The DSMS is required to create the new SRD (Service Request Definition) for the purpose of the new incident type. DSMS will need to query the User ID of the installing Supplier of a given Device from DSP. DSMS will need to assign the incident automatically to the installing Supplier and notify them using email. DSMS will also notify the creator of the incident whenever a note is added to the incident.

### 4.3 Data Management

Data Management changes will be required to introduce functionality to determine the installing Supplier, namely the Service User who has notified the Device based on the data held in the SMI.

## **4.4 Security Impact**

No changes are expected to the existing DSP security controls as a result of this change. A more detailed Security impact will be carried out as part of the Full Impact Assessment.

## **4.5 Technical Specifications and Documentation**

There are no changes to any of the Technical Specifications.

The following parts of the SEC will be impacted:

- Appendix AC 'Inventory Enrolment and Decommissioning Procedures'

SSI support materials should be updated to reflect these changes.

## **4.6 Infrastructure Impact**

Additional processing and storage will be required for this Modification, but as a standalone change this does not warrant the procurement of additional compute power or storage. Note, however, that the aggregated impact of many such changes to the DSP solution will ultimately result in a reduction of the available processing headroom assumed as part of the original DSP agreement.

The Modification does not impact the DSP resilience or Disaster Recovery implementation.

## **4.7 Integration Impact**

An initial estimate of the costs for integration (PIT) testing of the Modification are included in this PIA.

There is expected to be System Integration Testing (SIT) required for this change, but no User Integration Testing (UIT). However DCC is reviewing whether SSI changes should require UIT in future.

Integration testing will be evaluated in the FIA.

## **4.8 Application Support**

No changes to Application Support are expected.

## **4.9 Service Impact**

This Modification will have an impact on the ongoing service and it is likely that there will be some uplift in the Operational Charge. A more detailed service impact will be completed as part of the Full Impact Assessment.

No changes to SLAs or reporting are expected as a result of this change.

## 5 Implementation Timescales and Approach

Notwithstanding in which release this change is implemented, based on the currently stated requirements, the elapsed time for DSP implementation will be 3 to 6 months to PIT complete following the provision of full commercial cover.

The release lifecycle duration will be confirmed as part of the FIA.

## 6 Costs and Charges

The scope of supply under this PIA includes design, development (build), system testing, and testing within the PIT environments.

The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as assumed now. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a FIA and as such there may be elements missing from the solution or the solution may be subject to a material change during discussions with the DCC. As a result the final offer price may result in a variation.

The table below details the cost of delivering the changes and Services required to implement this Modification. For a PIA, only the Design, Build, and PIT indicative costs are supplied.

£	Design, Build and PIT, DSP Cost Range
SECMP0121	£150,000 – £350,000

Design	The production of detailed System and Service designs to deliver all new requirements.
Build	The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented. It includes Unit Testing (also referred to as System Testing), Performance Testing and Factory Acceptance Testing by the Service Provider or supplier.
Pre-Integration Testing (PIT)	Each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. This is assured by DCC.

Based on the existing requirements, the fixed price cost for a Full Impact Assessment is **£10,762** for either option and would be expected to be completed in 30 days.

## Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
COS	Change of Supplier
CR	DCC Change Request
DCC	Data Communications Company
DSMS	DCC Service Management System
DSP	Data Service Provider
FIA	Full Impact Assessment
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SLA	Service Level Agreement
SMETS	Smart Metering Equipment Technical Specification
SM WAN, SMWAN	Smart Meter Wide Area Network
SRD	Service Request Definition
SSI	Self Service Interface
UIT	User Integration Testing

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# MP121 ‘Commissioning non-commissioned Devices after CoS’

## Annex D

## Refinement Consultation responses

### About this document

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This document contains the non-confidential collated responses received to the MP121 Refinement Consultation.



## Question 1: Do you agree with the solutions put forward?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	<p>We believe that circa 8% of all SMETS2 devices are not commissioned at installation. These devices show under two different status' on the DCC system, "Installed not Commissioned" and "Pending".</p> <p>We believe it is essential to ensure that these devices can be commissioned at a later date by a supplier who did not install the device.</p> <p>We also believe that any solution proposed must work for any devices left uncommissioned at installation including devices showing as "Installed not commissioned" and ones showing as "Pending" where it is known the device has been installed with relevant industry installation flows sent.</p>	The solution is not intended to include or exclude any specific device statuses – parties will be able to request Install Codes from other parties in any situation where they believe that information will enable them to commission devices
Utilita Energy Ltd	Large Supplier	Yes	<p>Obligations need to be put in place for installing Suppliers to provide the necessary details to gaining Suppliers. We question if the proposed solution is best provided for through the SSI as costs remain significant and to allow for these obligations to be in place as soon as possible, therefore we are in favour of pursuing the alternative solution (via email correspondence).</p>	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	As having been directly impacted by this issue, we are fully supportive of the proposal presented but have some material concerns with the 5 WD SLA response measure and how this will be managed, monitored and reported upon. Will this be something that will be raised to SEC Panel or managed by the DCC themselves? If so, how? Please see the further questions on this.	<p>The proposed SLA can be discussed and amended as part of the Working Group discussions.</p> <p>The monitoring process would be different depending on the solution option chosen. It is envisaged that non-compliance would be escalated to SEC Panel.</p>
British Gas	Large Supplier	Yes	Yes we agree that a solution to share install codes is needed to avoid unnecessary meter work and enable commissioning of a perfectly fine meter.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	<p>Northern Powergrid Metering Limited (NPML) believes that the solution is a positive step forward for the following reasons:</p> <p>Working with the assumption raised by the Proposer of 3% of churned in meters being affected by this issue; this will lead to a reduction of up to 3% in unnecessary meter removals, the costs associated with the meter exchange, and the following steps the removed meter takes in its life cycle.</p> <p>Placing a requirement to respond within 5 days for the installing supplier into the SEC and placing the solution into the DCC system will further reduce the risk of a meter having to be removed due to slow communication.</p>	<p>It has been noted by others that only the Proposed Solution will allow tracking and statistical analysis of performance.</p> <p>However, there would need to be escalation routes of any failed obligation with either solution.</p>

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			This solution will also mean that the statistics covering this can be tracked, both the installing suppliers response times, and whether or not the devices have since been commissioned by the gaining supplier.	
Bulb	Large Supplier	Yes	Confidential Rationale	-
E.ON	Large Supplier	Yes - Partially	Ultimately this modification will bring benefits to suppliers that will be greatly welcomed, but it doesn't cover all scenarios for assets that are Installed but Not Commissioned/Enrolled. The Modification focuses on No WAN installations, when we also see plenty of scenarios where there has been an unsuccessful or partial install attempt, but the meter remains at the property. To successfully complete the install it may be necessary to uninstall and start the process again, which won't be possible using the same devices unless the install code is known. Also, as highlighted in the Report by another SEC Party, the modification assumes that all devices will be on ACB certs (or vanilla), when there will be suppliers out there with supplier specific certificates that an install code alone will not be able to resolve.	This modification is not seeking to cover all eventualities that could occur. However, it should encompass any situation where the gaining Supplier only requires the install code in order to Commission the meter.

## Question 2: Will there be any impact on your organisation to implement MP121?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	Being able to commission these devices at a later date will ensure that meters are not prematurely removed thus impacting the CBA of the SMIP, consumer experience of smart meters and the cost of smart meters provided to suppliers by MAPs.	-
Utilita Energy Ltd	Large Supplier	Yes	In preparation for implementation efforts will be needed to ensure the correct process is in place as an installing and CoS gaining Supplier.	-
OVO	Large Supplier	Yes	We would need to implement a process to handle any received SSI Incidents and respond to them in the SLA defined. It must be noted it's likely some Users may not have this data easily available and may need to make changes to be able to extract it to respond. Will there be some form of sweep up of historical devices in this state and cleared up? How will that be managed? The legal text, and the SSI process, gives no indication on this.	It is envisaged that the backlog will need to be cleared prior to the implementation of this SEC obligation.  Details of how that process will be managed can be discussed at the Working Group but will likely be dependent on the solution chosen.
British Gas	Large Supplier	Yes	Depending on the solution used, there will be impacts to us as a gaining and losing supplier. In terms of responding to requests, but also utilising the solution to support customers gained in an uncommissioned state. Both solutions will incur operational costs to support, with	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			the potential for some internal development to better utilise the solutions.	
Northern Powergrid Metering Limited	Other SEC Party	Yes	As a MAP, this will directly reduce the number of NPML's meters being removed, reduce disruption to the customer and minimise any unnecessary waste caused by their removal.	-
Bulb	Large Supplier	Yes	Confidential Rationale	-
E.ON	Large Supplier	Yes	Positives – a way of dealing with meters that churn but are not commissioned, without the need to replace.	-

### Question 3: Will your organisation incur any costs in implementing MP121?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	No	As a MAP we will not be required to make any changes for MP121	-
Utilita Energy Ltd	Large Supplier	Yes	For the reasons highlighted in Q2. Although there is currently an informal process in place, all Suppliers need to ensure these processes are robust to meet the obligation.	-
OVO	Large Supplier	Yes	Any process changes incur cost, as do any changes made by the DCC. We have to pay.	-
British Gas	Large Supplier	Yes	Confidential Rationale	-
Northern Powergrid Metering Limited	Other SEC Party	No	As this modification is targeted at putting responsibilities on Suppliers, and the DCC, there will be no cost impact on implementation of this modification on NPML. NPML will potentially save on costs through the reduction of meter removals caused by this modification, this includes the logistical cost and disposal cost of meters that are unable to be reinstalled.	-
Bulb	Large Supplier	Yes	Confidential Rationale	-
E.ON	Large Supplier		Development costs will be incurred to deliver the following:	-

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<ul style="list-style-type: none"> <li>A process to retrieve install codes in bulk from Supplier systems</li> <li>An ad hoc method of retrieving individual install codes</li> </ul> <p>Cost savings will be achieved by reducing the volume of meter exchanges and potential PRCs in replacing meters that are not faulty, but not installed correctly.</p>	



## Question 4: Do you believe that MP121 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	This modification will better facilitate SEC Objectives (1) and (3)	-
Utilita Energy Ltd	Large Supplier	Yes	By simply putting the obligations in place MP121 better facilitates SEC Objective (a) and (c), for the reasons highlighted in the Modification report.	-
OVO	Large Supplier	Yes	As set out in the Modification Report	-
British Gas	Large Supplier	Yes	We agree that this proposal would better facilitate the general SEC objectives	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	NPML agrees with the proposer that this modification better facilitates the General SEC Objectives A and C, as this will allow customers to benefit from the smart meter that is installed at their property.	-
Bulb	Large Supplier	Yes	-	-
E.ON	Large Supplier	Yes	Objectives A and C are facilitated through this modification.	-

## Question 5: Noting the costs and benefits of this modification, do you believe MP121 should be approved?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	There is a huge volume of meters that are not currently commissioned correctly and, by default, a large volume of these devices will no longer be with the installing supplier. We need a solution to enable these devices to be made operational as soon as possible and to prevent the volume from continuing to increase.	-
Utilita Energy Ltd	Large Supplier	Yes	These obligations on Suppliers ensure that Energy Consumers are offered the smart services from their meter.	-
OVO	Large Supplier	Yes	Yes as the cost of rectifying the issue, as an industry, far outweigh the costs set out. It must be noted that the costs to just make a change to the SSI seem to be wide ranging and incredibly high. Has a breakdown been provided to establish why this is so expensive for what it is? DCC passing an Incident to the Installing Supplier needs what development work for the DCC to provide? The details of the Design, Build and PIT work needed don't really seem to apply? What system changes, costing in the region of QUARTER OF A MILLION pounds, are needed to DCC systems? For an SSI change. For something done today within the SSI.	<p>The DCC costs will be expanded upon and clarity sought if this modification proceeds to FIA.</p> <p>The alternative solution would be a far cheaper option and a quicker implementation.</p>

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	Yes, we agree a solution is needed.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	This modification will lower overall costs of the smart meter roll out, by reducing the total number of unnecessary removals, reduce the waste that is generated from those removals, and minimise the amount of disruption to end users by reducing the number of visits to site the customer receives in the roll out.	-
Bulb	Large Supplier	Yes	-	-
E.ON	Large Supplier	Yes	The modification is what we want, but it would be good to cover the other areas highlighted in our response in Q1	Please see SECAS Response against Q1.

## Question 6: If MP121 is approved, which solution do you believe should be implemented?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Proposed Solution	<p>We would prefer a solution that obligates suppliers to comply rather than a solution outside the SEC which suppliers can opt out of. However, as a MAP, we do not pay SEC charges so our response has not considered the cost of implementing the proposed solution and whether this provides value for money to parties that will be required to pay for the solution.</p> <p>Any solution must cover meters with an “installed not commissioned” status and also meters which retain a “pending” status after installation.</p>	<p>The solution is not intended to include or exclude any specific device statuses – parties will be able to request Install Codes from other parties in any situation where they believe that information will enable them to commission devices</p>
Utilita Energy Ltd	Large Supplier	Alternative Solution	For the reasons highlighted in Question 1.	-
OVO	Large Supplier	Proposed Solution	<p>Unfortunately, it would not be possible to define the alternative solution in the SEC as it could not be measured and managed. That would need a process between Suppliers outside the SEC.</p>	<p>If the obligation is put into the SEC then failures could be escalated to SEC Panel as required.</p> <p>There could be potential for this to be included within a Performance Assurance Framework (PAF) to manage performance and escalation through the Operations Group. However, this would be a potential</p>

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
				future solution as the PAF is not currently in place.
British Gas	Large Supplier	Proposed Solution	We believe the proposed solution is better as a long-standing solution. However, there is also an argument to potentially implement an alternative solution earlier to gage use and iron out an operational challenges. SSI may not be the best solution given its complexity and lack of usability as detailed in answer to Q3	If the Proposed Solution is deemed not fit for purpose then one option would be to implement the Alternative Solution and then a subsequent modification be raised to continue work on identifying a workable automated solution.
Northern Powergrid Metering Limited	Other SEC Party	Proposed Solution	<p>The proposed solution puts the responsibilities on the organisations that are in the best position to resolve this issue. At the same time it also allows for recording of performance via DCC ticket resolution.</p> <p>The alternative solution whilst faster and cheaper to implement relies on email correspondence and transfer of install codes and would require each supplier to develop relations with every other supplier to facilitate this securely. This is something that will be track performance on, which as a MAP we believe is critical to keeping meters on the wall.</p>	The Proposed Solution does have the benefit of improved automation and reporting. As mentioned above, an option to implement the Alternative Solution to place an obligation on Suppliers could be pursued, with a subsequent modification raised
Bulb	Large Supplier	Proposed Solution	-	-
E.ON	Large Supplier	Proposed Solution	The proposed solution offers a cleaner enduring process, however there is no reason why the alternative solution	If the Proposed Solution is deemed not fit for purpose then one option would be to implement the Alternative Solution and

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			couldn't be approved for use until the proposed solution can be delivered.	then a subsequent modification be raised to continue work on identifying a workable automated solution.

## Question 7: How long from the point of approval would your organisation need to implement MP121?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	No lead time	As a MAP we would not have to implement any changes	-
Utilita Energy Ltd	Large Supplier	Approximately 6 months	This is to ensure that all processes are robust, tested and automated where possible.	-
OVO	Large Supplier	6 months	This requires internal process changes but should not require system changes to Users.	-
British Gas	Large Supplier	3-6 months	We would initially implement manual solution and use the learnings from this to build a sustainable long-term automated solution	-
Northern Powergrid Metering Limited	Other SEC Party	NPML will have no lead time associated with the implementation of this modification	There are no requirements being placed on NPML, as such there is nothing to be implemented by NPML to prepare for the modification	-
Bulb	Large Supplier	Confidential Response	-	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
E.ON	Large Supplier	3 – 6 months	Time would be required to develop a system that can accommodate requests for information, and also make requests to other suppliers.	-



## Question 8: Do you agree with the proposed implementation approach?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	This change needs to be implemented as soon as possible. There are already significant volumes of meters which were not commissioned at installation and this needs to be reduced to deliver smart benefits to consumers.	-
Utilita Energy Ltd	Large Supplier	No	If the alternative solution is chosen and preferred, an Ad-hoc SEC release may not be enough time to make sure all processes are robust.	The Alternative Solution could be implemented with agreement from Parties on an appropriate timescale.
OVO	Large Supplier	Yes	Strangely the implementation approach seems to be based on the amount of work DCC need to design, build and test... but it is unclear what needs building?	The Proposed Solution can only be delivered dependent on DCC timescales. The Alternative Solution can be implemented upon agreement from SEC Parties.
British Gas	Large Supplier	Yes	Yes we agree.	-
Northern Powergrid Metering Limited	Other SEC Party	No	As this modification will significantly reduce the number of unnecessary meter removals, and significantly reduce the waste generated by the smart meter implementation programme, if the planned earliest implementation date of the November release is not met, this should be implemented as soon as possible following this release, and not incur a further 7 month delay unless that is	The Alternative Solution could be implemented with agreement from Parties on an appropriate timescale.  The Proposed Solution is dependent on DCC being able to deliver the requirements.

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			absolutely necessary for delivery of the service via the DCC	
Bulb	Large Supplier	Yes	-	-
E.ON	Large Supplier	Yes	As mentioned above, the proposed solution is the most suitable for the longer term.	-

## Question 9: Do you agree that the legal text will deliver MP121?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	-	We have not reviewed the legal text	-
Utilita Energy Ltd	Large Supplier	Yes	-	-
OVO	Large Supplier	Yes	Yes, although it does not pick up the SLA management.	SLA Management and escalation will need to be determined and added to the legal text and/or Modification Report.
British Gas	Large Supplier	Yes	Yes we agree.	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	NPML believes that the text proposed in the consultation document will sufficiently deliver MP121	-
Bulb	Large Supplier	-	-	-
E.ON	Large Supplier	Partially	There is no outline for what will happen if the timeframe (currently 5 business days) is breached.	SLA Management and escalation will need to be determined and added to the legal text and/or Modification Report.

## Question 10: Do you believe five Working Days provides a reasonable timescale for installing Suppliers to respond to the request?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	-	-
Utilita Energy Ltd	Large Supplier	Yes	-	-
OVO	Large Supplier	No	Being that this is setting an explicit precedent against DCC Users which is tighter than the PCO upon then, we would like to question how 5 days was arrived upon and where this was discussed and agreed. There is no other SLA, of this nature, in the SEC so could be challenging depending on the nature of the process to ensure compliance and management. Is this the part that will cost the money DCC has stated in the Consultation?	The SLA can be discussed and determined by the Working Group. The Proposer believes a 10 working day SLA would be reasonable.
British Gas	Large Supplier	No	Complexity to automate would be high and therefore could be high resource required depending on the solution used and issues detailed in answer to Q3. We believe initially the timescale would be 30 days and reduced over a period of time once the solutions used are clearer and volumes known to allow resource to be assigned.	<p>The SLA can be discussed and determined by the Working Group. The Proposer believes a 10 working day SLA would be reasonable.</p> <p>An agreed process to clear the backlog could be carried out before the obligation is implemented and therefore volumes should be lower before implementation.</p>

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Question 10				
Respondent	Category	Response	Rationale	SECAS Response
				Should a Gaining Supplier send an unreasonable number of Devices then a comparable SLA could be agreed between the parties without the need for escalation.
Northern Powergrid Metering Limited	Other SEC Party	Yes	The longer a meter remains un-commissioned following a change of supply event, the more likely that the meter will be removed, and so five Working Days seems a fair amount of time for an installing supplier to respond to the request.	-
Bulb	Large Supplier	-	-	-
E.ON	Large Supplier	No	Without seeing how the internal solution will look like, we don't see five days being a suitable time period, certainly not in its infant stages of implementation.	The SLA can be discussed and determined by the Working Group. The Proposer believes a 10 working day SLA would be reasonable.

## Question 11: Do you believe there will be any impacts on or benefits to consumers if MP121 is implemented?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	Delivering MP121 will enable existing meters to be commissioned and thus deliver smart benefits to customers who already have a smart meter installed but not commissioned and thus operating as a dumb meter. It will also improve the general image of smart metering and the benefits it can deliver when functioning correctly thus encouraging more consumers to opt for a smart meter installation.	-
Utilita Energy Ltd	Large Supplier	Yes	This gives Energy Consumers a greater possibility of having access to smart services from their meter.	-
OVO	Large Supplier	Yes	The benefits lie in being able to commission gained devices. Unless there is dramatic work done to ensure EVERY Installation commissions on site at the point of Install, this will happen ongoing. Being unable to then complete the commission post CoS must be managed and addressed.	-
British Gas	Large Supplier	Yes	Where the install code can be used to rectify the situation, this will prevent unnecessary exchanges, and allow smart enablement for customers. However, we are aware that	This modification is not seeking to cover all eventualities that could occur. However it should encompass any situation where the

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
			the install code alone won't be the resolution for every case.	gaining Supplier only requires the install code in order to Commission the meter.
Northern Powergrid Metering Limited	Other SEC Party	Yes	There will be a reduction in visits to the premises where the meter is installed, as unnecessary exchanges are mitigated by the modification. The consumer will also have the benefit of being able to use their smart meter in smart mode, following successful exchange of install codes and commissioning. Lastly, the consumer will also benefit from any reduction in waste caused by unnecessary meter removals.	-
Bulb	Large Supplier	-	-	-
E.ON	Large Supplier	Yes	Consumers with Smart meters will be able to enjoy the benefits of Smart, and this process should be a much quicker and pain-free process than a full meter replacement which is the only option at the moment	-

## Question 12: If you are a Supplier, what percentage of Devices would you estimate are gained in an uncommissioned state?

Question 12			
Respondent	Category	Response and rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	As a MAP, we estimate that circa 8% of all installed SMETS2 meters are affected. These devices are either in an “Installed not Commissioned” state or remain in a “Pending” state even though they have been installed.  Both “Installed Not Commissioned” devices and “Pending after installation” devices need to be covered by this modification.	-
Utilita Energy Ltd	Large Supplier	40-45%	-
OVO	Large Supplier	Unsure why this is a Yes / No Response in the template. Percentages for this are currently very low but it is not the amount causing the problem, it's the effort needed to investigate and correct them.	-
British Gas	Large Supplier	Confidential Response	-
Northern Powergrid Metering Limited	Other SEC Party	-	-
Bulb	Large Supplier	-	-
E.ON	Large Supplier	Confidential Response	-



### Question 13: If you are a Supplier, what percentage of Devices would you estimate are installed and left in an uncommissioned state?

Question 13			
Respondent	Category	Response and rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Please see our response to question 12	-
Utilita Energy Ltd	Large Supplier	-	-
OVO	Large Supplier	N/A	-
British Gas	Large Supplier	Confidential Response	-
Northern Powergrid Metering Limited	Other SEC Party	-	-
Bulb	Large Supplier	-	-
E.ON	Large Supplier	Confidential Response	-

## Question 14: Do you agree that having the ability to raise incidents via the SSI for install code requests in bulk would be a valuable addition for the Proposed Solution?

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Capital Ltd	Other SEC Party	Yes	Given the volume of devices affected, a bulk request mechanism would be preferable.	DCC has subsequently advised that a bulk option within the SSI is not possible, therefore the Alternative Solution is currently the only solution with a bulk option.
Utilita Energy Ltd	Large Supplier	Yes, in an ideal scenario using the SSI would be helping for bulk management – but the cost of the solution needs to be taken into serious account.	As was highlighted in the Working Group, it is questionable if using the SSI is worthwhile if the cost is equivalent to £1 per meter site.	DCC has subsequently advised that a bulk option within the SSI is not possible, therefore the Alternative Solution is currently the only solution with a bulk option.

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Isn't this Question 6?	DCC has now advised a bulk option is not possible within the current SSI and therefore the only solution with a bulk option is now the Alternative Solution.
British Gas	Large Supplier	Yes	Needs to be available to make the solution viable	DCC has subsequently advised that a bulk option within the SSI is not possible, therefore the Alternative Solution is currently the only option with a bulk option.
Northern Powergrid Metering Limited	Other SEC Party	-	-	-
Bulb	Large Supplier	-	-	-
E.ON	Large Supplier	Yes	There are currently thousands of devices in this state, that would require significant time to go through and raise an incident for each device individually, there needs to be the capability to bulk load requests. This has to be an option.	DCC has subsequently advised that a bulk option within the SSI is not possible, therefore the Alternative Solution is currently the only solution with a bulk option.

## Question 15: Please provide any further comments you may have.

Question 15			
Respondent	Category	Comments	SECAS Response
Calvin Capital Ltd	Other SEC Party	-	-
Utilita Energy Ltd	Large Supplier	No further comment	-
OVO	Large Supplier	N/A	-
British Gas	Large Supplier	SSI is a complex system and usability limited and therefore may not be the best solution in its given form of incidents. Further work needed to refine the solution so its usable for suppliers Some systems are locked down so utilisation of install codes will be very manual and complex to process	If the Proposed Solution is deemed not fit for purpose then one option would be to implement the Alternative Solution and then a subsequent modification be raised to continue work on identifying a workable automated solution.
Northern Powergrid Metering Limited	Other SEC Party	-	-
Bulb	Large Supplier	-	-
E.ON	Large Supplier	The Mod looks at a very specific scenario in No WAN installations which will help rectify a large percentage of instances, but it does not go the full way to rectify all installed but not commissioned assets.	This modification is not seeking to cover all eventualities that can occur, however it should encompass any situation where the Gaining Supplier only requires the install code in order to Commission the meter.