



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy
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The Authority (Ofgem), the SEC Panel,
SEC Parties, TBDG, TSIRS and other
interested parties

13 September 2021

Dear Colleague,

Smart Metering Implementation Programme: Government Response to Consultation on changes to GB Companion Specification (CRPs 613 and 649) to address operational issues associated with re-joining Gas Smart Metering Equipment

On 9 August 2021 BEIS published a consultation¹ on changes to the GB Companion Specification (GBCS) to address operational issues associated with re-joining Gas Smart Metering Equipment (GSME) through CRPs 613 and 649. The consultation closed on 27 August 2021. We received a total of nine responses from energy suppliers, a DCC Adapter Provider, device manufacturers, a manufacturer trade association and a DCC Communications Service Provider.

The BEIS proposals in the consultation were supported by two energy suppliers, the energy supplier trade association Energy-UK, a DCC Adapter Provider, a DCC Communications Service Provider and two device manufacturers. The gas meter manufacturers' trade association, Energy and Utilities Alliance (EUA) and one device manufacturer disagreed with the proposals. A summary of consultation responses and the Government response can be found at the **Annex** to this letter.

Upon consideration of the points raised in response to the consultation there is clear support for the proposals as set out in the consultation document and while there were a small number of objections, viable alternatives were not proposed and as such we intend to implement the proposed changes.

¹ <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-changes-to-the-gb-companion-specification-to-address-operational-issues-associated-with-re-joining-gas-smart-metering-equipment-crps-613-and-649/>

BEIS will therefore incorporate the changes laid out in CRP613 and CRP 649 into GBCS v4.1 (and consequently into the Smart Energy Code) by re-designating GBCS v4.1 on 4 November 2021² so that they are implemented as part of the November 2021 SEC Release.

Yours faithfully,



Duncan Stone

Deputy Director & Head of Delivery
Smart Metering Implementation Programme

Annex: Consultation Response document

² Or, if necessary, as soon as reasonably practicable within one month thereafter should there be any delay to the SEC November 2021 Release.

Annex – Consultation Response

1. Summary of Responses

- 1.1. On 9 August we invited views on a proposal to amend GB Companion Specification (GBCS) v4.1³ which will form part of the Smart Energy Code (SEC). Four questions were asked in the consultation as follows:
- i) Do you agree that GBCS v4.1 should be modified by CRP613⁴?
 - ii) Do you agree that GBCS v4.1 should be modified by CRP649⁵?
 - iii) Do you agree with our proposal to direct that GBCS v4.1 is re-designated on 4 November 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter)?
 - iv) Do you have any further comments to make?
- 1.2. We received nine responses from across industry as follows:
- two large energy suppliers as direct responses;
 - Energy-UK (the energy supplier trade association);
 - a DCC Adapter Provider;
 - a DCC Communications Service Provider (CSP);
 - three device manufacturers; and
 - EUA (the gas meter manufacturers' trade association).
- 1.3. The responses from two energy suppliers, Energy-UK, a DCC Adapter Provider, a DCC Communications Service Provider and two device manufacturers were supportive of all the proposals. Energy-UK was keen to point out that its response was supported by its members such that a number chose not to respond separately.
- 1.4. The DCC Adapter Provider response mentioned that it was also representative of some of the small suppliers that they provide relevant services to, and also that its response was aligned to that of Energy-UK, reinforcing the need for swift implementation.
- 1.5. Energy-UK's response made three further points:
- As discussed at the Technical and Business Design Group (TBDG), consideration should be given by DCC to an adjustment being made to the release plan for the GBCS v3.2 Communications Hub (CH) firmware delivery approach, such that single-band releases for GBCS v3.2 compliant CH should be 'Over the Air' (OTA) upgrade releases only, as the issues only arise at first install. Suppliers would install pre GBCS v3.2 and then DCC would upgrade the CH (OTA) post install, minimising the need for suppliers to change their business processes in advance of CRP649 and CRP613 implementation. This OTA only point was repeated in both of the responses from the large energy suppliers and noted by a device manufacturer. One of the large energy suppliers further suggested that the approach should be represented through an update to the Joint Industry Plan (JIP). The other large energy supplier wanted assurance that the next generation⁶ CH

³ <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-changes-to-the-gb-companion-specification-to-address-operational-issues-associated-with-re-joining-gas-smart-metering-equipment-crps-613-and-649/>

⁴ The proposal associated with CRP613 was briefly described and embedded in the consultation document

⁵ The proposal associated with CRP649 was briefly described and embedded in the consultation document

⁶ The next generation CH refers to the current proposals to develop a 4G CH

would be built on the basis of GBCS v4.1 compliance (further to the CRPs being incorporated).

- A lessons learned exercise should be carried out (as discussed in July 2021 TBDG and SEC Operations Group meetings), to include DCC's test assurance activities to improve visibility of similar issues earlier in the process, particularly when there are technically complex proposals, operational impacts and security-related considerations. The exercise should also include the process by which changes to technical specifications once agreed by the Technical Specification Issue Resolution Subgroup (TSIRS) are made through Smart Energy Code (SEC) Modifications.
 - A request for clarity around any associated changes to the SEC Schedule 11 – Technical Specification Applicability Tables (TSAT).
- 1.6. The response from the DCC CSP was in support of all the proposals and was also supportive of the approach to the firmware change package mentioned by Energy-UK and large energy suppliers, as above. It raised an additional point that CH compliant with GBCS v3.2 should be made available where suppliers requested them.
- 1.7. One device manufacturer accepted the proposals with no objections.
- 1.8. The EUA and one device manufacturer objected to the proposals on the following grounds:
- A lack of visibility of the problems that the CRPs in the consultation were addressing;
 - Lack of need for CRP535 (the CRP that triggered the issues this consultation is addressing);
 - Energy suppliers would need to change their systems regardless; and
 - GSME manufacturers would have no choice in implementing CRP613.

2. BEIS Response

- 2.1. We note supportive responses from industry particularly the energy suppliers that are directly impacted by the issue and that ultimately have the regulatory obligations to install smart meters.
- 2.2. In response to the points raised by Energy-UK we note the following:
- At the request of energy suppliers, DCC has indicated it will investigate with its CSPs the provision of GBCS v3.2 FW as OTA only for single band CH. DCC has also indicated that its next generation CH will be compliant with GBCS v4.1 (as it will appear in the SEC on re-designation);
 - A lessons learned exercise is in progress; and
 - This consultation only considered the additional content required for GBCS v4.1. Any changes required to SEC Schedule 11 (Technical Specifications Applicability Table) would be set via the normal SEC modification processes.
- 2.3. In response to the comment by the DCC CSP that CH compliant to GBCS v3.2 should be made available for suppliers we note that this is for DCC and suppliers to resolve.
- 2.4. We note the objections raised; however, no viable alternative proposals were put forwards. We have summarised the objections raised and our response below:

Lack of visibility or need for CRP535 – Prior to consultation BEIS organised a number of meetings between BEIS, GSME manufacturers, EUA and Security Sub

Committee (SSC) to clearly articulate the justification and need. SSC is the authority for security related matters of the SEC and the relevant body to provide opinion on the need for the CRPs in question. Answers were provided to all points raised in these meetings and no further objections were raised. It was noted by all parties that the justification could have been articulated more clearly in 2017 when CRP535 was approved by industry, and this will form part of a lessons learned exercise led by SEC Operations Group (with input from TBDG).

Energy suppliers needing to change their systems – Energy suppliers have asked DCC to make GBCS v3.2 CH ‘OTA’ only, to work around the issues seen in the short term as it only manifests at first install. DCC will provide an update on implementation at the September 2021 IMF meeting. This would ensure that no changes to supplier systems are required in advance of CRP613 and CRP649 implementation.

GSME manufacturers have no choice in implementing CRP613 – Implementation of CRP613 into a new version of GBCS will not end date the prior version of GBCS. This gives energy suppliers the choice to procure GSME against either version of GBCS to suit their individual GSME installation and commissioning processes. Implementation of CRP613 provides choice and optionality for energy suppliers.

3. Response Conclusion

- 3.1 In conclusion, BEIS will therefore incorporate the changes laid out in CRP613 and CRP 649 into GBCS v4.1 (and consequently into the Smart Energy Code) by re-designating GBCS v4.1 on 4 November 2021 so that they are implemented as part of the November 2021 SEC Release.
- 3.2 A draft version of the GBCS v4.1 marked up with CRP613 and CRP649 changes as well as any changes from SEC modifications will be published as part of the “SECAS - November 2021 SEC Release” web page⁷.

⁷ <https://smartenergycodecompany.co.uk/november-2021-sec-release/>