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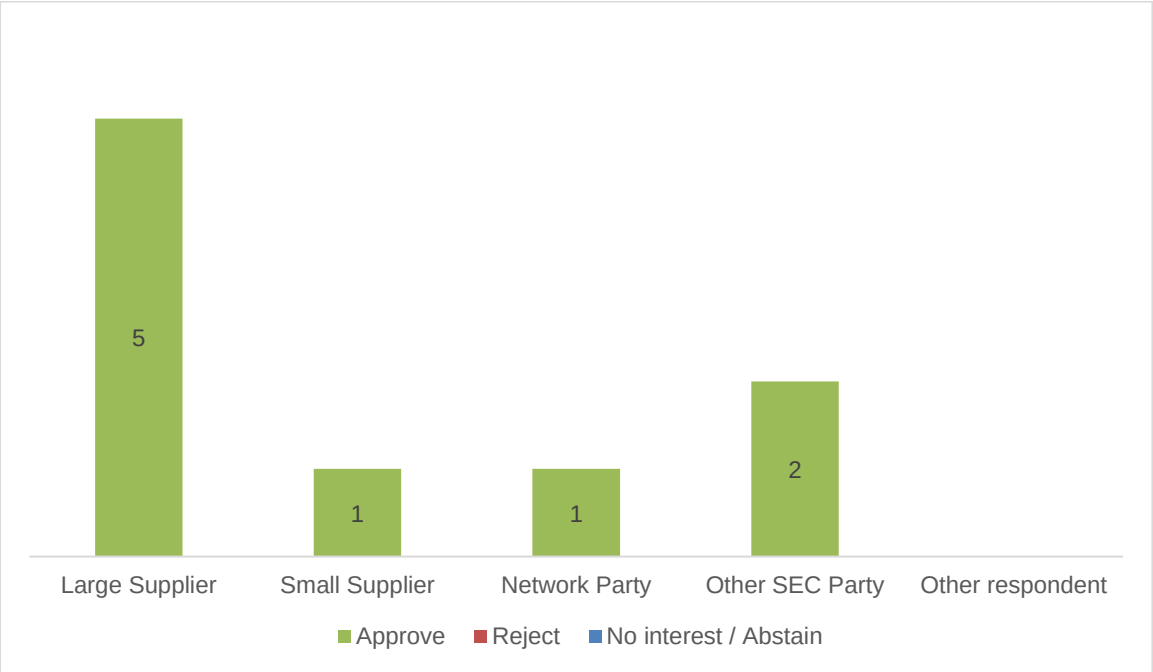
MP196 'Further IVP Extension for pre SMETs 2 v4.2 Devices'

Modification Report Consultation responses

About this document

This document contains the non-confidential collated responses received to the MP196 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP196 should be approved or rejected?

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Calvin Capital	Other SEC Party	Approved	We fully support this modification. Due to continuing impacts of the COVID pandemic and due to significant incidents of SoLR over the past few months, there remain significant quantities of pre-SMETS2v4.2 devices within the supply chain. An extension to the IVP will allow these devices to be installed and then upgraded to v4.2 compliance. Given the current issues within the supply chain including the shortages of components and price increases, now is not the time for pre SMETS2v4.2 devices remaining in the supply chain to be scrapped. These devices need to be installed and the extension of the IVP will allow this to happen. Installing these devices will also avoid the potential environmental impact if these devices are scrapped rather than installed.
So Energy	Small Supplier	Approved	So Energy hold significant stock of SMETS v2.0 firmware devices and wish to install these to help facilitate SEC objectives A, C and E. While every effort is being made to install these ahead of the April deadline, there are significant barriers to being able to complete this in time including the current COVID-19 situation. So Energy is also undergoing a merger with ESB Energy and taking on most of their outstanding meter stock which may require some time for installers to adapt. SMETS v2.0 devices are easily upgraded over the air following install and do not have any lasting deficiencies compared to SMETS v4.2 devices. There are no lasting backwards compatibility issues as the smart metering network has been operated with a combination of various SMETS version up until now and this will not change following the end of the current installation validity period.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
			The fact that SMETS v4.2 communications hubs are not ready for mass manufacture and that there is a parallel consultation to extend the end date for these further removes any urgency to make SMETS v2.0 devices obsolete. If the extension is not granted these devices will be scrapped causing a significant financial and environmental impact contrary to SEC objective E.
Western Power Distribution	Networks Party	Approved	We believe this Modification Proposal better facilitates General SEC Objective (a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain
E.ON	Large Supplier	Approved	While the value of this delivery is not as extreme as the previous extension, there are still clear cost savings for suppliers, benefits to customers, and the potential for negative press against the Smart rollout based on redundant stock is mitigated.
Northern Powergrid Metering Limited	Other SEC Party	Approved	We are currently in the middle of a global component shortage across the electronics industry; failure to use every asset available is wasteful. Once installed these meters are being updated to SMETS2 v4.2 compliant firmware and will operate the same as meters that were manufactured on later firmware versions. Any deadlines or decisions that prevent usable stock from being deployed would further worsen the global component shortage. Whilst our customers have been working to reduce the number of meters pre SMETS2 v4.2 that remain off the wall, the extension of the IVP of these meters will further reduce the risk of stranded stock.
EDF	Large Supplier	Approved	We agree that this Modification Proposal better facilitates SEC General Objective (a), as this will help to better facilitate the efficient provision and installation of smart metering systems by avoiding costs and environmental wastage through stock write-offs.

Question 1			
Respondent	**Category**	**Response**	**Rationale**
Utilita Energy Limited	Large Supplier	Approved	We do support this modification in subject of email for the same reasons as the recent CHTS1.0 & 1.1 extensions (minus the point made about issues with GBCS 3.2 CHs): *A – extension of time in which [Devices] are permitted to be installed, when considering the volumes currently held by Suppliers, and the issues associated with installation of GBCS 3.2 CHs, makes sense and facilitates the efficient installation of smart metering systems.*
Bulb Energy	Large Supplier	Approved	We fully support the proposal to extend the IVP to 27 April 2023, as it provides suppliers, installers and MAPs additional time to manage supply chains as Covid-19 continues to have an impact on smart meter installations eg. changes in consumer willingness, or flexibility for installations under fluid UK restrictions. MP196 better facilitates SEC Objective (a) by mitigating the cost of scrapped assets and/or costs to return devices to manufacturers to be upgraded to v4.2 versions. Without an IVP extension, Bulb would have a large number of pre v4.2 assets that would need to be upgraded or scrapped. This would generate cost, and possibly environmental waste, to our smart installation programme.
British Gas	Large Supplier	Approved	We agree that this Mod Proposal should better facilitate SEC General Objective (a) – by helping to improve the efficient provision and installation of smart metering systems by avoiding costs and environmental wastage through stock write-offs.

Question 2: Please provide any further comments you may have

Question 2		
Respondent	**Category**	**Comments**
Calvin Capital	Other SEC Party	None
So Energy	Small Supplier	None
Western Power Distribution	Networks Party	None
E.ON	Large Supplier	None
Northern Powergrid Metering Limited	Other SEC Party	None
EDF	Large Supplier	It makes sense to ensure that there is enough time to install all existing stock of pre-SMETS v4.2 Devices and avoid the associated costs
Utilita Energy Limited	Large Supplier	None
Bulb Energy	Large Supplier	None
British Gas	Large Supplier	None