SEC
Smart Energy Code

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Smart Energy Code

MP143
'Incorporating IRPs into GBCS v3 series'

Modification Report

Version 0.6

19 January 2022

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About this document

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

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

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1. Summary

This proposal was raised by Terry Jefferson from the Energy and Utilities Alliance (EUA).

MP098 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 3' was implemented in the November 2020 SEC Release. It incorporated 20 non-DCC System impacting Issue Resolution Proposals (IRPs) into the GB Companion Specification (GBCS) v4.0 and the Smart Metering Equipment Technical Specifications (SMETS) 2 documents of that release.

During the development of MP098, there was no material benefit to implement the 18 GBCS impacting IRPs into the GBCS version 3.x series. SEC Parties would like to incorporate these 18 IRPs into the GBCS v3 series as and when a material change necessitates an uplift to the next GBCS v3.x.

During development of MP143 it has become apparent that SEC Parties only require certain IRPs to be included within the GBCS version 3.x series. The scope of this modification is now those five IRPs: IRP589, IRP596, IRP623, IRP631 and IRP642.

The DCC's Preliminary Assessment indicates that implementation will cost up to £150,000, with a lead time of three months for Design, Build and Pre-Integration Testing (PIT). If approved, this modification is targeted for the November 2022 SEC Release. MP143 is currently the only modification proposing an uplift to the GBCS version 3.x series.

This modification will affect all Suppliers, Other SEC Parties and the DCC. It will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

MP098 introduced 20 non-DCC System impacting IRPs into the GBCS v4.0 and the SMETS Device Level Versioning of 29 November 2020 in the November 2020 SEC Release. To ensure certainty for the industry it was agreed that the 18 GBCS impacting IRPs would not be implemented into the GBCS version 3.x series (to give an uplift to v3.3) as it was deemed not materially beneficial at the time.

What is the issue?

Industry discussion, primarily from meter manufacturers, has noted there should have been an option to implement these IRPs into the GBCS version 3.x series in the November 2021 SEC Release. This was not part of the implementation approach consulted upon in MP098.

It had been assumed that the November 2021 SEC Release would include other material changes to the GBCS version 3.x series. However, this was not the case and MP143 is the only active modification proposing to make changes to this series.

Device Manufactures believe their Devices will not be compliant with the Commercial Product Assurance (CPA) scheme if some of these IRPs are not incorporated into the GBCS version 3.x series.

What is the impact this is having?

If the GBCS version 3.x series continues to be used but these IRPs are not incorporated, the industry efficiencies provided by these IRPs will not be possible.

IRPs identify issues in the SEC Technical Specifications. The IRPs included in this proposal are the same GBCS impacting IRPs included in MP098 (IRP589 and IRP596) and three further IRPs (IRP623, IRP631 and IRP642) that were identified as needing implementation into GBCS version 3.x series.

The remaining IRPs from MP158 and MP098 are no longer in scope of this modification. The IRPs that remain in scope are listed in the table below. The individual IRP details can be found on the SECAS website link here under document name 'MP143 IRPs for inclusion'.

Non system impacting IRPs		
IRP number	**IRP title**	**Impacted Technical Specification**
IRP589	CS02b authentication sequence v0_1	GBCS
IRP596	TransCoS Execution Counters – CS02b query	GBCS
IRP623	Read ALCS Event Log values v2	GBCS
IRP631	Table 7 3 8 - Correction of Inconsistency	GBCS
IRP642	Reclarifying trigger for Alert Code 8F69 v0_2	GBCS

Impact on consumers

If not resolved, some Devices that are installed at consumer premises will not be compliant with CPA certification. These Devices would therefore need to be replaced and disposed of, causing negative environmental impacts.

3. Solution

Proposed Solution

The Proposed Solution is to incorporate these IRPs into the GBCS version 3.x series in the soonest possible Technical Specification impacting scheduled SEC Release.

Based on feedback from Device Manufacturers, the only IRPs that are required to be placed into the GBCS version 3.x series are:

- IRP589 'CS02b authentication sequence'
- IRP596 'TRANSCOS execution counters'
- IRP623 'Read ALCS Event Log values v2'
- IRP631 'Table 7 3 8 - Correction of Inconsistency'
- IRP642 'Reclarifying trigger for Alert Code 8F69 v0_2'

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

This proposal will impact Device Manufacturers with Devices that operate in compliance with GBCS v3.2 as well as all Suppliers due to the implementation of a new version of GBCS v3.x series.

None of these IRPs will impact Communications Hubs. There is a loosening of restrictions on the Communications Hubs but there will not be any forced change as they will already be compliant with the existing specification.

DCC System

Although the IRPs within this Modification Proposal are non-DCC System impacting, an uplift to the GBCS version 3.x series will mean the Data Service Provider (DSP) needs to make changes to their system to recognise the new version as valid.

The Communications Service Providers (CSPs) are not required to have GBCS v3.3 compliant Communications Hubs declared in the Central Products List (CPL) and therefore the impacts upon them are limited to testing the interoperability of their GBCS v3.2 and 4.1 Communications Hubs against GBCS v3.3 Devices.

The full impacts 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:

- Schedule 8 'GB Companion Specification'
- Schedule 11 'TS Applicability Tables'

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

Technical specification versions

This modification would introduce a new Sub-Version to the GBCS version 3.x series. Currently, this would result in a new GBCS v3.3.

Consumers

If implemented, this modification will positively impact consumers. Any costs incurred by Parties for disposal of Devices would ultimately be passed onto the consumer. Additionally, removing the need to have Devices removed will mean less site visits to consumers.

Other industry Codes

This modification will not impact any other industry Codes.

Greenhouse gas emissions

If implemented, this modification will positively impact greenhouse gas emission. If not resolved, some Devices that are installed at consumer premises will not be compliant with CPA certification. These Devices would therefore need to be replaced and disposed of, causing negative environmental impacts.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is £0 - £150,000. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	**Cost**
Design, Build and Pre-Integration Testing (PIT)	£0 - £150,000
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

The DCC has noted that whilst there will be additional costs for SIT and UIT, these are not expected to take the costs for the modification outside of the range provided above.

More information can be found in the DCC Preliminary Assessment response in Annex C.

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days 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.

SEC Party costs

This modification will not incur any direct SEC Party costs. However, should Parties choose to uplift to a new version of the GBCS, they would incur a cost, but this would include all other modifications associated with this uplift. SEC Party views were sought during the Refinement Consultation. One respondent noted they could not accurately confirm costs without knowing what Devices would need to be replaced. Another respondent noted the costs to Suppliers and Meter Asset Providers (MAPs) of not implementing this solution would be incurred from Device replacements, and the implementation would mean Devices did not need to be replaced.

Full responses to the Refinement Consultation can be found in Annex D.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 3 May 2022; or
- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received after 3 May 2022 but on or before 2 May 2023.

As this modification impacts the GBCS, it should be implemented alongside other GBCS changes to prevent new versions being created unnecessarily. However, currently MP143 is the only modification proposing an uplift to the GBCS version 3.x series. The November 2022 SEC Release is the earliest release this modification can be targeted for. The DCC has highlighted they will require three months for Design, Build and PIT. The full timescales will be confirmed within the full Impact Assessment.

If a decision is not received in time for the November 2022 SEC Release, it will be targeted for the November 2023 SEC Release, which is the next release expected to contain SEC Technical Specification changes.

7. Assessment of the proposal

Observations on the issue

Change Sub-Committee views

The Change Sub-Committee (CSC) agreed the issue was clear. During the September 2020 CSC meeting, the Proposer advised that the reason for raising this modification was to ensure if/when a material change is required to the GBCS v3.x series, the IRPs could also be incorporated to make Devices more efficient.

The Proposer also noted that the industry would need to consider the consequences of Devices that could not be upgraded and what the Validity Periods of existing versions should be. There is also an ongoing question around what is worth upgrading and creating a new GBCS v3.x version for, which could potentially make Devices non-compliant with the specifications.

Solution development

The initial proposal was raised when SEC Parties expressed a desire for the option to incorporate these 18 IRPs included in MP098 into the GBCS version 3.x series as and when a material change necessitates an uplift to the next GBCS v3.x. The Proposer's initial aim was to target this modification for the November 2021 SEC Release when it was assumed SECMP0007 'Firmware updates to IHDs and PPMIDs' would be applied to both the GBCS versions 3.x and 4.x series. However, SECMP0007 was only applied to GBCS v4.x in the November 2021 SEC Release. Consequently, later on in refinement, the Proposer agreed to target this modification for the November 2022 SEC Release instead.

The Proposed Solution is dependent on the industry's decision on whether a GBCS version 3.x series is required. It is also affected by SEC Parties' preferences on which IRPs should be included within the GBCS version 3.x series, should there be another release.

Should the GBCS version 3.x series be maintained?

DCC and SECAS views

SECAS and the DCC aim to have no more than a single linear uplift to the Technical Specifications where there is a material benefit, to minimise disruption to industry. The desired approach is to move forward against the latest version of the given Technical Specification with each change being additive over time on a linear basis, instead of changes to different Technical Specification series being made in parallel. SECAS worked closely with the DCC via the Working Group to draft the Technical Specifications for the modifications in the November 2021 SEC Release during their refinement. In drafting these, it was assumed these would be applied to the latest GBCS version series only (expected to be v4.x at the time).

SECAS has carried out an investigation into the implementation of a further uplift to the GBCS version 3.x series and has found several risks and impacts of doing so. These are summarised in the points below:

- Implementation approach for parallel versions of the GBCS were not considered as part of the Working Groups or draft legal text changes for the modifications targeted for the November 2021 SEC Release;

- Greater complexity for the DCC to implement and manage GBCS compatibility for a parallel GBCS v3.3 alongside a GBCS v4.1;
- Significant increase in testing permutations of GBCS, SMETS and CHTS combinations for both the DCC and Device Manufacturers, with the DCC needing more emulators for GBCS v3.3;
- Increased document maintenance, with the GBCS v3.3 effectively containing different specifications to the proposed GBCS v4.1; and
- Increased complexity for industry in facilitating parallel versions of the GBCS, each implementing sub-sets of functionality.

The DCC and SECAS also considered the precedent that maintaining the GBCS version 3.x series could set for future releases. This could lead to further parallel versions of the GBCS being supported in the future which would amplify the impacts noted above. This significantly increases the complexity of managing each release for the DCC and management of GBCS compatibility for all Users, as all Parties would have to manage multiple GBCS combinations, with each version containing different functionality.

The DCC also had initially advised that uplifting the GBCS version 3.x series as well as the GBCS version 4.x series would have Communications Hub impacts. Further definition would be required to determine the obligations on the DCC relating to supporting Communications Hubs against any extension to the GBCS v3.x series i.e. would the DCC need to release new Communications Hub firmware to ensure compliance to any new GBCS v3.3. This would have impacted the DCC's implementation plans for the November 2021 SEC Release.

The subsequent reduction in scope of this modification to five IRPs has meant that there will not be an impact on Communications Hubs.

Risk to the delivery of the November 2021 SEC Release

All of the above impacts would have presented a risk to the implementation of the November 2021 SEC Release if MP143 was approved for this release.

Taking into consideration the Working Group discussions, the DCC had always assumed that only the GBCS version 4.x series would be impacted by this release as it seeks to maintain the approach of only have a single GBCS series, which we agree with.

Any additional implementation of a parallel GBCS version 3.x series in the form of GBCS v3.3 would have needed to be progressed as a change to the existing November 2021 SEC Release scope. It would therefore have needed to be Impact Assessed by all impacted Parties to determine the impacts of implementation timescales and associated costs. This had the potential to result in added implementation time and effort for the DCC and its Service Providers, which it may not be able to mitigate in order to prevent a delay to the November 2021 SEC Release.

TABASC views

SECAS provided the TABASC with an update on the November 2021 Technical Specification Applicability Table (TSAT) versions[1]. SECAS recommended that MP143, if approved, will only be implemented in the November 2021 release if another change to the GBCS version 3.x series is also

[1] Please see TABASC paper TABASC_62_0402_08 for more details

approved for inclusion that MP143 can go in alongside, which is dependent upon industry preferences. SECAS highlighted the risks of introducing a GBCS v3.3 and recommended that the GBCS version 3.x series was not uplifted.

A TABASC Member advised that the original concern for Meter Manufacturers was that there was no plan for older versions of the GBCS to be made obsolete, with multiple versions of the standards coexisting.

A further concern was that some of the changes implemented into GBCS v4.0 were not implemented into the GBCS v3.x series, and that this may result in compliance challenges for manufacturers. The TABASC Member advised that they would gather views from the EUA and report their findings back to SECAS to share with the TABASC.

A TABASC Member highlighted a concern that they were yet to receive GBCS v3.2 Dual Band Communications Hubs and they were not expecting those from Arqiva until December 2021. If the GBCS starts to cut off at v3.2 then this may cause maintenance issues. The TABASC Chair agreed that more needs to be done with the DCC to speed up the delivery of GBCS v3.2 compliant Communications Hubs but believed this issue should be handled separately from whether both GBCS v3.x and GBCS v4.x series are maintained.

The TABASC Chair added that the GBCS 4.x series changes had Device behaviour impacts but did not impact the behaviour of Communications Hubs. They were reasonably comfortable with continuing with just the GBCS v4.x series, subject to the views of the EUA and the British Electrotechnical and Allied Manufacturers Association (BEAMA).

EUA views

SECAS highlighted the risks of uplifting the GBCS version 3.x series in the November 2021 SEC Release and recommended that this does not occur. SECAS also asked the EUA to consider that MP143 would be the only modification causing this uplift.

EUA members expressed their need for several of the IRPs included in MP098 to be implemented in the GBCS version 3.x series. This was due to the desire to keep operating on the GBCS version 3.x series whilst ensuring the specification reflected the current behaviour of Devices, ensuring Device compliance.

The Proposer did not agree that the impacts listed would have a material impact on the DCC or Parties and were strongly opposed to no longer maintaining the GBCS v3.x series. They advised that two of the IRPs in question were essential from a CPA / compliance perspective:

- IRP589 ‘CS02b authentication sequence’
- IRP596 ‘TRANSCOS execution counters’

BEAMA views

Following the Technical Specification Issue Resolution Sub-group (TSIRS) meeting on 8 July 2021, MP143 was discussed, and a request was made for an ESME manufacturer view from BEAMA members. BEAMA consulted with members and reiterated its position that BEAMA currently supports the need for the GBCS 3.x series. BEAMA also requested more clarity around what moving to the GBCS 4.x series requires that is understood by the whole industry. Different parties appear to have opposing views, as to hence whether the move to the GBCS 4.x series requires Auxiliary

Proportionate Control (APC) functionality and maybe other functionality to be present or not. This additional functionality would require a hardware change.

The implication from the TSIRS was that the GBCS 4.x series could be implemented without any hardware changes.

Conclusion
Following these discussions, the Proposer has agreed that a version of GBCS series v3.x must be maintained. It is envisioned that version 3.3 will be the last update to this series.

Which IRPs should be in scope?

SECAS advised that all 18 of the non-DCC System impacting IRPs from MP098 were initially in scope of MP143. The DCC had advised that the number of non-DCC System impacting IRPs had little impact on it. Therefore, SECAS asked the Working Group to consider whether the non-DCC System impacting IRPs within MP158 'Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 5', which is targeted for implementation in the GBCS v4.x series in the November 2021 SEC Release, should be added as well.

IRP623 and IRP631 in the table below were originally within scope of MP158, but were withdrawn from scope as they specifically need to be added to the GBCS v3.x series.

IRP642 was raised following the initiation of this modification. It provides an additional clarification on text that was inserted into GBCS v3.2 as part of SECMP0055 and the Proposer has confirmed they were happy to include this within the modification. SECAS recommended that they were included into the scope of this modification.

MP158 – GBCS v3.x impacting IRPs		
IRP Number	**What is the issue?**	**What is the impact?**
IRP623	Clarification is required regarding whether the 'control HAN connected Auxiliary Load Control Switch (ALCS)' command, issued from the ESME to an ALCS or a HAN Connected Auxiliary Load Control Switches (HCALCS), has an associated entry in the ALCS Event Log for both calendar driven events and remote party commands.	This is causing ambiguities in the scenarios in which the Device is meant to record entries into the ALCS Event Log.
IRP631	The Device Language Message Specification (DLMS) Device Requirements (for ESME) which are contained in GBCS v4.0 are not reflected in GBCS v3.x. This IRP aims to incorporate the changes in DLMS Device Requirements (for ESME) that have been baselined on GBCS v4.0 into GBCS v3.x.	This is causing inconsistency between GBCS v4.x and GBCS v3.x.
IRP642	The Alert with Alert Code 0x8F69 need only be sent when a GSME first establishes full communications with a CHF, so has first completed CBKE and tunnel establishment. The GBCS text does not specify this.	Devices could be designed to send Alerts for every tunnel establishment.

The Proposer and a Device Manufacturer questioned the benefit in including all of the non-DCC System impacting IRPs from MP098 and MP158, noting that some of them could have Device

Manufacturer impacts. They clarified that they only sought IRP589 and IRP596 to be implemented in the GBCS v3.x series, considering feedback from other Device manufacturers.

A manufacturer advising from an Electricity Smart Metering Equipment (ESME) perspective noted the need for IRP631 'Table 7 3 8 - Correction of Inconsistency' which has been discussed at the TSIRS. The IRP states that it would be incorporated into the next GBCS 3.x version. SECAS highlighted that IRP631 only impacts ESME and it was agreed the BEAMA should provide a view on its need.

SECAS also presented a similar proposal to TSIRS members following the Working Group, and highlighted the feedback that had been received then.

TSIRS members agreed with the view that not all IRPs from MP098 and MP158 were required for inclusion within the GBCS version3.x series. Members supported the reduction in scope to just the IRPs that are included within the Proposed Solution.

BEAMA also confirmed its agreement that the IRPs 589, 596, 623, 631 are the only ones that need to be included within the modification.

EUA contacted its members who had no objections to the inclusion of the new IRP642 within this modification.

Conclusion
Only the following IRPs should be included within the scope of this modification: • IRP589 'CS02b authentication sequence' • IRP596 'TRANSCOS execution counters' • IRP623 'Read ALCS Event Log values v2' • IRP631 'Table 7 3 8 - Correction of Inconsistency' • IRP642 'Reclarifying trigger for Alert Code 8F69 v0_2'

Should GBCS v3.x series be end dated?

One Working Group member wanted clarification on whether the plan is to bring GBCS v3.3 alongside GBCS v3.2, or to make GBCS v3.2 obsolete. SECAS advised it would not propose end-dating GBCS v3.2 if an uplift to GBCS v3.3 occurred.

Another Working Group member also questioned if the changes that are coming into effect in the November 2022 SEC Release will warrant an uplift to the GBCS version 3.x series, and when the Installation Validity Periods (IVP) and Maintenance Validity Periods (MVP) will be agreed.

SECAS advised that the Technical Specification versions for the November 2022 SEC Release are yet to be confirmed but that it would consult the industry and the Technical Architecture and Business Architecture Sub-Committee (TABASC) on the best approach.

The Proposer and a Device manufacturer confirmed that they would not expect any further uplifts to the GBCS v3.x series following the implementation of the two IRPs in question. They added that this modification could be used in part to end-date previous versions of the GBCS v3.x series if a new Sub Version is added to include the IRPs in question. These include GBCS v3.0, v3.1 and v3.2.

TSIRS members also shared the view that older versions of the GBCS v3.x series could be end dated.

SEC Parties were consulted on this element as part of the Refinement Consultation. Neither respondent supported end dating earlier versions so it will not form part of this modification.

IRP 613

In July 2021 the Department for Business, Energy, Industrial & Strategy (BEIS) contacted SECAS with regards to IRP613 'Clarification for binding on rejoin'. BEIS requested that IRP613 was added to the scope of MP143, for inclusion within November 2021 SEC Release. As the issue relates to the imminent release of GBCS v3.2 compliant Communications Hubs, BEIS felt it would be unacceptable to wait until November 2022. This would result in a change to the MP143 implementation, bringing it forward from the November 2022 SEC Release to the November 2021 SEC Release.

The DCC carried out an impact assessment and confirmed that the addition of these IRPs, as well as IRP613, for inclusion within the November 2021 SEC Release could only be done if it received a decision on MP143 by the end of July 2021.

SECAS could not commit to this request due to the timeline constraints. It was not possible to conduct industry consultations, nor fully investigate the possible impact IRP613 may have had on manufactures and the need for Working Group meetings to discuss it. The Proposer did not wish to add this IRP to the scope of this modification and jeopardise the inclusion of the four IRPs already in scope for inclusion. BEIS has since confirmed that IRP613 will not be introduced into GBCS v3.x and will instead only be added to the GBCS v4.x series, and this will be carried out separately to this modification.

Support for Change

TABASC views

Subject to the EUA and BEAMA views, the TABASC initially agreed with the views of the DCC and SECAS that an uplift to the GBCS version 3.x series should not occur. However, following consultation with the EAU, BEAMA and the TSIRS, it has become clear manufacturers need to maintain the GBCS version 3.x series to ensure compliance with the CPA. SECAS reported back to the TABASC following the Preliminary Assessment and Refinement Consultation. TABASC subsequently supported proceeding to Impact Assessment.

EUA views

EUA engaged with the Meter Manufacturers (and the other EUA Member group) for feedback to identify what IRPs from their perspective are critical. The response received stated that there are only two which have a CPA / compliance perspective, which they believe are essential and therefore need to be incorporated in to a GBCSv3.x version.

BEAMA views

BEAMA consulted with its members and reiterated its position that BEAMA currently supports the need for the GBCS 3.x series.

Working Group views

The Working Group was presented with the benefits and potential costs of the modification following the Preliminary Assessment. The Working Group agreed that the modification should progress.

Refinement Consultation

One respondent noted that these IRPs are essential to ensure any Devices, which are built to GBCS v3.x, remain compliant with the GBCS and therefore remain CPA compliant. This would prevent their premature removal.

Another respondent advised that they were supportive of the rationale but believed IRP613 needed to be included.

Views against the General SEC Objectives

Proposer's views

Objective (a)[2]

The Proposer believes that this modification will better facilitate SEC Objective (a) as the implementation of the IRPs will reduce the risk of future operational issues arising.

Industry views

The Working Group agreed with the Proposer that this modification will better facilitate SEC Objective (a). Respondents to the Refinement Consultation also agreed with this view.

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 will have a neutral impact against this consumer area.

Reduced environmental damage

If implemented, this modification will have a positive impact against this consumer area as potentially non-compliant Devices would not need to have been removed and disposed.

[2] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Improved quality of service

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

Benefits for society as a whole

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

Appendix 1: Progression timetable

The Refinement Consultation findings were discussed with the Working Group and the Preliminary Assessment with the TABASC. This modification will be presented to the Change Board on 26 January 2022 to request a DCC Impact Assessment.

Timetable	
Event/Action	**Date**
Draft Proposal raised	18 Sep 2020
Presented to CSC for initial comment	29 Sep 2020
Modification discussed with Working Group	6 Jan 2021
Modification discussed with TABASC	4 Feb 2021
Modification discussed with EUA	16 Feb 2021
Modification discussed with BEAMA	Apr 2021
Modification discussed with Working Group	7 Jul 2021
DCC Preliminary Assessment requested	7 Sep 2021
Preliminary Assessment discussed with Working Group	1 Dec 2021
Refinement Consultation	7 Dec 2021 – 4 Jan 2022
Refinement Consultation responses discussed with Working Group	5 Jan 2022
Preliminary Assessment discussed with TABASC	6 Jan 2022
Impact Assessment requested	26 Jan 2022
Impact Assessment returned	21 Feb 2022
Impact Assessment discussed with Working Group	2 Mar 2022
Impact Assessment discussed with TABASC	3 Mar 2022
Modification Report approved by CSC	15 Mar 2022
Modification Report Consultation	16 Mar 2022 – 5 Apr 2022
Change Board vote	20 Apr 2022

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**
APC	Auxiliary Proportionate Control
BEAMA	British Electrotechnical and Allied Manufacturers Association
CPA	Commercial Product Assurance
CPL	Central Products List
CSC	Change Sub-Committee
CSP	Communications Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
ESME	Electricity Smart Metering Equipment
EUA	Energy and Utilities Alliance
GBCS	Great Britain Companion Specification
IRP	Issue Resolution Proposal
IVP	Installation Validity Period
MAP	Meter Asset Provider
MVP	Maintenance Validity Period
PIT	Pre-Integration Testing
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	System Integration Testing
SMETS	Smart Metering Equipment Technical Specifications
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSIRS	Technical Specification Issue Resolution Sub-group
UIT	User Integration Testing

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MP143 'Incorporating IRPs into GBCS v3 series'

Business requirements – version 1.0

About this document

This document contains the business requirements that support the solution 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

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

Business Requirements	
Ref.	**Requirement**
1	The following non-DCC System impacting Issue Resolution Proposals (IRPs) shall be included in the GB Companion Specification (GBCS) v3.x series: • IRP589 'CS02b authentication sequence' • IRP596 'TRANSCOS execution counters' • IRP623 'Read ALCS Event Log values v2' • IRP631 'Table 7 3 8 - Correction of Inconsistency' • IRP642 'Reclarifying trigger for Alert Code 8F69'

2. Considerations and assumptions

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

2.1 General

The Department for Business, Energy and Industrial Strategy (BEIS) Technical Specification Issue Resolution Sub-Group (TSIRS) has determined the changes need under these IRPs and have passed them to the Smart Energy Code Administrator and Secretariat (SECAS) to incorporate into the SEC via the Modification Process.

The five IRPs in scope of this modification are Non-DCC System impacting that affect the Technical Specification documents only.

2.2 Requirement 1: Five non-DCC System impacting IRPs shall be included in the GBCS v3.x series

The Proposer requests that the following non-DCC System impacting IRPs be included in the GBCS v3.x series:

- IRP589 'CS02b authentication sequence'
- IRP596 'TRANSCOS execution counters'
- IRP623 'Read ALCS Event Log values v2'
- IRP631 'Table 7 3 8 - Correction of Inconsistency'
- IRP642 'Reclarifying trigger for Alert Code 8F69'

The Proposer wishes for these IRPs to be included in the November 2022 SEC Release.

IRP589 and IRP596 have already been implemented into GBCS v4.0 in the November 2020 SEC Release. However, both IRPs are recognised by Device manufacturers as essential for inclusion in GBCS v3.x as well, to ensure Devices operating on GBCS v3.x are Commercial Product Assurance (CPA) compliant.

IRP623 and IRP631 were previously include in MP158 'Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 5'. However, as the IRP documents for each of these IRPs explicitly stated the changes needed to be applied GBCS v3.x, both IRPs were moved to this MP143.

IRP642 'Reclarifying trigger for Alert Code 8F69' states that it should be included within GBCS v3.x as well as GBCS v4.x. Therefore, IRP642 will be included within MP143 to carry the GBCS v3.x changes. It will also be included within a new Draft Proposal but only for the GBCS v4.x changes. This is to maintain efficiency and to limit the number of new GBCS versions for each series.

Although the IRPs in scope of MP143 are non-DCC System impacting, any uplift to the GBCS v3.x series will have an impact on the DCC. A Preliminary Assessment is sought to understand these impacts, including any impacts on the DCC's Application Support.

Device manufacturers have noted that they expect the resulting GBCS v3.x uplift (if MP143 is approved) to be the last for the GBCS v3.x series.

3. 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 for Business, Energy and Industrial Strategy
DCC	Data Communications Company
CHTS	Communications Hub Technical Specifications
GBCS	GB Companion Specification
IRP	Issue Resolution Proposal
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
TSIRS	Technical Specification Issue Resolution Sub-Group

Data Communications Company

SEC Modification Proposal, SECMP0143, DCC CR4472

Incorporating IRPs into the GBCS Version 3 Series

Preliminary Impact Assessment (PIA)

Version:	**0.3**
Date:	**29th October, 2021**
Author:	**DCC**
Classification:	**DCC PUBLIC**

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1 Executive Summary

The Change Board are asked to approve:

- Total cost to complete the Full Impact Assessment of £6,114
- The timescale to complete the Full Impact Assessment of 30 working days
- ROM costs for SECMP0143 up to the end of Pre-Integration Testing (PIT) of up to £150,000

Problem Statement and Solution

During the development of SECMP0098, it was identified there was no material benefit to implement the 18 GBCS impacting IRPs into the GBCS version 3.x series.

During development of SECMP0143 it has become apparent that SEC Parties only require certain IRPs to be included within the GBCS version 3.x series.

Benefits

The main beneficiaries of the change will be Device Manufacturers who believe their Devices will not be compliant with the Commercial Product Assurance (CPA) scheme if some of these IRPs (IRP589, IRP596, IRP623 and IRP631) are not incorporated into the GBCS version 3.x series. Industry discussion, primarily from meter manufacturers, has noted there should be an option to implement these IRPs into the GBCS version 3.x series in a future SEC Release.

Device Manufactures believe their Devices will not be compliant with the CPA if some of these IRPs are not incorporated into the GBCS version 3.x series.

The solution accommodates the changes in GBCS 3.3 to meet device manufacturer needs, but as all the IRPs are Category 3, document-only changes which do not require any Comms Hub firmware changes, there is no impact on the Communications Service Providers (CSPs). This means current and future deployed Comms Hub firmware versions will work successfully with any devices which will support GBCS 3.3. Some relatively minor changes are required in the DSP to support Central Products List and Service Request processing.

2 Document History

2.1 Revision History

Revision Date	Revision	Summary of Changes
04/10/2021	0.1	Initial version, DCC and DSP review
28/10/2021	0.3	Changed scope and solution

2.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Filename	Source	Issue Date
1	MP143-Business Requirements-1.0	SECAS	20/10/2021
2	MP143 Modification Report v0.4.pdf	SECAS	20/10/2021

References are shown in this format, [1].0

2.3 Document Information

The current Proposer for this Modification is Terry Jefferson, Energy and Utilities Alliance (EUA). The original proposal was submitted on 21st August 2020.

An initial Preliminary Impact Assessment was requested of DCC on 14th August 2021. However the requirements were changed slightly and a new PIA request was accepted by the DCC on 27th October, 2021.

3 Context and Requirements

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

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

3.1 Problem Statement

SECMP098 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 3' was implemented in the November 2020 SEC Release. It incorporated 20 non-Data Communications Company (DCC) System impacting Issue Resolution Proposals (IRPs) into the GB Companion Specification (GBCS) v4.0 and the Smart Metering Equipment Technical Specifications (SMETS) 2 documents of that release.

During the development of MP098, there was no material benefit to implement the 18 GBCS impacting IRPs into the GBCS version 3.x series. SEC Parties would like to incorporate these 18 IRPs into the GBCS v3 series as and when a material change necessitates an uplift to the next GBCS v3.x.

During development of SECMP0143 it has become apparent that SEC Parties only require certain IRPs to be included within the GBCS version 3.x series.

3.2 Business Requirements

This section contains considerations and assumptions for the business requirement.

Req.	Requirement
1	The following non-DCC System impacting Issue Resolution Proposals (IRPs) shall be included in the GB Companion Specification (GBCS) v3.x series: • IRP589 'CS02b authentication sequence' • IRP596 'TRANSCOS execution counters' • IRP623 'Read ALCS Event Log values v2' • IRP631 'Table 7 3 8 - Correction of Inconsistency' • IRP642 'Reclarifying trigger for Alert Code 8F69'

Table 1: Business Requirements for SECMP0143, CR4472

IRP589 and IRP596 have already been implemented into GBCS v4.0 in the November 2020 SEC Release. However, both IRPs are recognised by Device manufacturers as essential for inclusion in GBCS v3.x as well, to ensure Devices operating on GBCS v3.x are CPA compliant.

IRP623 and IRP631 were previously include in SECMP0158 'Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 5'. However, as the IRP documents for each of these IRPs explicitly stated the changes needed to be applied GBCS v3.x, both IRPs were moved to this MP143.

IRP642 'Reclarifying trigger for Alert Code 8F69' states that it should be included within GBCS v3.x as well as GBCS v4.x. Therefore, IRP642 will be included within MP143 to carry the GBCS v3.x changes. It will also be included within a new Draft Proposal but only for the GBCS v4.x changes. This is to maintain efficiency and to limit the number of new GBCS versions for each series. Industry discussion, primarily from meter manufacturers, has noted there should be an option to implement these IRPs into the GBCS version 3.x

series in a future SEC Release. This was not part of the implementation approach consulted upon in SECMP098.

Device Manufactures believe their Devices will not be compliant with the CPA if some of these IRPs are not incorporated into the GBCS version 3.x series.

3.3 Scope

The IRPs included in this proposal are the same GBCS impacting IRPs included in MP098 (IRP589 and IRP596) and three further IRPs (IRP623, IRP631 and IRP642) that were identified as needing implementation into GBCS version 3.x series. The remaining IRPs from SECMP0158 and SECMP098 are no longer in scope of this modification. The IRPs that remain in scope are listed in the table below. The individual IRP details can be found in Appendix B.

There is no stated requirement for Comms Hub Firmware and Comms Hubs to be GBCS 3.3 compliant. In general, this solution will be applicable to SMETS2 Devices.

4 Description of Solution

This section describes the DCC approach to supporting the included IRPs in GBCS 3.3, and the Service Provider changes to accommodate these changes.

4.1 Implementation Overview

Any changes required for a new GBCS 3.3 version can be accommodated in the DCC Total System by some relatively minor changes at the DSP, but the CSP impact can be significantly limited by making the case for the Comms Hub firmware to not be compliant with GBCS 3.3. The solution can be looked at with a CSP perspective as follows:

- IRP589, IRP596 are already in GBCS 4.0
- IRP623, IRP631 and IRP642 are planned to be included in GBCS 4.1
- All the IRPs are Category 3, document-only changes which do not require any Comms Hub firmware changes.
- The current GBCS 3.2 or GBCS 2.1 Comms Hub firmware are compliant to these IRPs. This means currently deployed Comms Hub firmware versions will work successfully with any devices which will support GBCS 3.3.
- Once the Comms Hub firmware is compliant to GBCS 4.1, this will mean the Comms Hub firmware is compliant in terms of these IRPs.

The upside of this approach is that neither CSP will need to create a new branch of Comms Hub firmware specific they won't need to create or implement GBCS 3.3 compliant Comms Hub firmware. Any CSP-specific document changes are covered in the GBCS 4.1 workstream and would not need to be included in this Modification.

An alternative approach of creating a new Comms Hub firmware code branch requiring full implementation and testing would give little positive benefit, have a very high associated cost, introduce more work in Comms Hub firmware area, and would not be delivered in the short to medium term. Any delivery of Comms Hub firmware compliant to another firmware version would be a significant change to DCC's policy and plans to release future firmware release. In addition, industry, through the GBCS Working Group, were extremely reluctant to take on the extra costs and minimal benefits associated with a GBCS 3.3.

Given the nature of the proposed changes in this Modification, DCC are proposing a different approach to implementing these IRPs and supporting Comms Hubs in the DCC Total System.

1. There will be no requirement for CSP North or CSP South and Central to support GBCS 3.3 compliant Comms Hubs nor GBCS 4.0 compliant Comms Hubs in the Central Products List (CPL).
2. Any Comms Hub upgrade path will be from GBCS 3.2 to GBCS 4.1 directly.
3. There will be testing requirements to ensure GBCS 3.2 and GBCS 4.1 Comms Hubs are interoperable and compatible with GBCS 3.3 and GBCS 4.1 devices, including meters, PPMIDs, SAPCs etc).

4.2 DSP Changes

DSP changes to support the GBCS 3.3 for CPL validation and Command creation are required as follows:

- The Central Products List processing needs to recognize GBCS 3.3 as a valid GBCS version
- Service Request processing requires mappings of GBCS Use Cases for GBCS v3.3 (which will be the same as GBCS v3.2)
- Regression testing in SIT related to device testing ensures GBCS 3.3 compliant devices will be supported by DCC with a different version of DUIS

DSP have to record the full GBCS version from the CPL and also has to create a mapping table for every GBCS version.

4.2.1 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.

4.2.2 Infrastructure Impact

There will be no change to the infrastructure design as a result of this change. Additional processing and storage will be required; however, these are not sufficiently large to warrant the procurement of additional compute power or storage as part of this Modification. Note 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. As such, DSP may need to raise a Change Request (CR) for the provision of additional infrastructure should the DCC Total System experience performance problems that are the direct result of such changes.

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

4.2.3 Integration Impact

An initial estimate of the costs for PIT testing of the Modification is included in this PIA.

This change will require additional testing in SIT, but should not require any additional testing in UIT.

Specific tests would need to be executed against the new increment of GBCS. SIT testing would involve execution of approximately 140 tests, following on from some test preparation work. SIT costs are not included in this PIA, and would be included in any FIA.

4.2.4 Application Support

No changes to Application Support are expected.

4.3 CSP Changes

Using the approach detailed above, there is no requirement for CSP North or CSP South and Central and TEF to have GBCS 3.3 compliant Comms Hub nor GBCS 4.0 compliant Comms Hubs declared in the CPL. The Comms Hub upgrade path will be GBCS 3.2 to GBCS 4.1 directly.

In addition the interoperability requirement for GBCS 3.2 Comms Hubs working with GBCS 3.3 and GBCS 4.1 devices and GBCS 4.1 Comms Hubs working with GBCS 3.3 devices is not high impact and the likelihood of issues is relatively low. Provisional testing plans are shown in the following table.

	GBCS 3.3 Devices	**GBCS 4.1 Devices**
GBCS 3.2 Comms Hub	No interoperability problem expected. Potential SIT testing as part of SECMP0143.	No interoperability problem expected. Could use SLS emulator for Testing
GBCS 4.1 Comms Hub	No interoperability problem expected. Covered by SIT testing as part of the GBCS 4.1 Comms Hub firmware release using SLS emulator.	As part of GBCS 4.1 CH FW delivery, a SLS emulator will be used in post-PIT testing, specifically to test CRP613.

Table 2: Device and Comms hub Interoperability

GBCS 4.1 Comms Hub development and test is not in scope of this Modification, and is being handled in other DCC Change Requests.

5 Implementation Timescales and Approach

Notwithstanding in which release this change is implemented, and based on the currently stated requirements, the elapsed time for DSP implementation will be approximately three (3) months following the provision of full commercial cover, as part of the CAN signature process.

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. This 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. 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
SECMP0143	£0 - £150,000

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.

It should be noted that post-PIT testing costs are not expected to take this Modification outside of this range.

Based on the existing requirements, the fixed price cost for a Full Impact Assessment is **£6,114** and would be expected to be completed in 30 working days.

6.1 Contract and Schedule Changes

Updates to the Design Baseline (Schedule 4.1) and Payment milestones (Schedules 6.1 and 7.1) are anticipated for this Modification.

Appendix A: Glossary

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

Acronym	Definition
CH, Comms Hub	Communications Hub
CPA	Commercial Product Assurance
CPL	Central Products List
CR	DCC Change Request
CSP	Communications Services Provider
DCC	Data Communications Company
DSP	Data Service Provider
EUA	Energy and Utilities Alliance
FIA	Full Impact Assessment
GBCS	GB Companion Specification
IRP	Issue Resolution Proposal
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
PPMID	PrePayment Meter user Interface Device
ROM	Rough Order of Magnitude (cost)
SAPC	Standalone Auxiliary Proportional Controller
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specification
SRV	Service Request Variant
UIT	User Integration Testing

Appendix B: IRP Information

IRP589 CS02b authentication seque
IRP596 TRANSCOS execution counters.
IRP623 Read ALCS Event Log values v2
IRP631 Table 7 208 - Correction of Incon
IRP642 Reclarifying trigger for Alert Cod

Note that IRP589 and IRP596 have already been implemented into GBCS v4.0 in the November 2020 SEC Release.

IRP #	Issue	Impact
IRP623	Clarification is required regarding whether the 'control HAN connected Auxiliary Load Control Switch (ALCS)' command, issued from the ESME to an ALCS or a HAN Connected Auxiliary Load Control Switches (HCALCS), has an associated entry in the ALCS Event Log for both calendar driven events and remote party commands.	This is causing ambiguities in the scenarios in which the Device is meant to record entries into the ALCS Event Log.
IRP631	The Device Language Message Specification (DLMS) Device Requirements (for ESME) which are contained in GBCS v4.0 are not reflected in GBCS v3.x. This IRP aims to incorporate the changes in DLMS Device Requirements (for ESME) that have been baselined on GBCS v4.0 into GBCS v3.x.	This is causing inconsistency between GBCS v4.x and GBCS v3.x.
IRP642	The Alert with Alert Code 0x8F69 need only be sent when a GSME first establishes full communications with a CHF, so has first completed CBKE and tunnel establishment. The GBCS text does not specify this.	Devices could be designed to send Alerts for every tunnel establishment.

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MP143 'Incorporating IRPs into GBCS v3 series'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP143 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	Yes	However, in fixing this it causes other problems which are covered in other questions	-
EUA Trade Association	Other SEC Party	Yes	The IRPs in scope of this modification are Non-DCC System impacting, but are require to be incorporating into GBCS v3.x. These IRPs are essential to ensure any devices which are built to GBCS v3.x remain compliant to GBCS and therefore remain Commercial Product Assurance (CPA) compliant. It should be noted these IRPs and associated details have been worked through TSIRs and they have already been incorporated into GBCS v4.x.	-

Question 2: Do you agree that the legal text will deliver MP143?

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	Yes	The legal text was reviewed as part of the IRP process and aligns to what was agreed.	-
EUA Trade Association	Other SEC Party	Yes	The details for the IRPs have been worked through TSIRs	-

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	No	1. Having a version of GBCS that may not ever be used when v4.1 is available at the same time. We are curious as to why users would not go up to v4.1 and concerned if that were not to be the case, this could cause a delay to v4.1. 2. One of the critical elements of v4.1 is IRP613, which is the fix we require to resolve the issues caused by CRP535. The risk is that v4.1 will be pushed to the right and we will not get IRP613 any earlier. To agree with the proposal, we would want IRP613 to be included in this release, which it is not. 3. If this doesn't make the dates and is approved following May 2022, there will be a preceding version of GBCS that would nullify this version. 4. There is conflicting information in the modification report. It is unclear whether the implementation of this will impact Comms Hubs. The report states that "SECAS confirms that none of these IRPs will impact the Communications Hubs" while at the same time stating "The DCC also advised that uplifting the GBCS version 3.x series as well as	1. This new version of GBCS v3.x series is required to protect Devices that are already installed against CPA recertification. Some of these Devices cannot be upgraded to GBCS v4.x series via a firmware upgrade. By implementing these IRPs into the GBCS v3.x series it removes the need to exchange those Devices prematurely, which would result in additional cost to MAPs, Suppliers and consumers. 2. IRP613 was discussed by BEIS at TSIRS and it was decided that it was not cost effective to add that into the GBCS v3.x series. 3. SECAS has been given assurances that the DCC would be able to meet the relevant

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			the GBCS version 4.x series would have Communications Hub impacts."	deadlines to ensure this modification can be implemented in November 2022. 4. This was a result of early conversations through this process. It was included in the Modification Report to provide context to the historical conversation. This has now been clarified within the report.
EUA Trade Association	Other SEC Party	Yes	In order to minimise costs for implementation, these IRPs have been incorporated into the Nov 2022 release rather than stand alone.	-

Question 4: Do you agree that previous versions of the GBCS, namely GBCS v1.1, 2.0 and 2.1, should be end dated as part of this modification?

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	No	Unless something is going to be done with all of the devices that are on those versions, of which we have quite a few. The issues on those versions will need to be addressed first. There is no mention in the modification report of any discussions or plans to address end dating previous versions other than v3.x. How would this be done?	-
EUA Trade Association	Other SEC Party	No	It is unclear what is meant by 'end-date' (eg TSAT IVP or support date) which needs clarity to be able to comment but given the recent mod to extend dates we do not agree taking this decision in isolation is correct.	-

Question 5: Will there be any impact on your organisation to implement MP143?

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	Yes	Based on the uncertainty of the implementation approach. Unless the implementation approach is clear, it is difficult to understand the true impacts. We would expect the fixes that we want in v4.1 are unlikely to be achieved following the implementation of v3.3, resulting in the replacement of devices that we don't want to have to replace. We want to ensure that we are getting the benefits of the fixes that are coming in i.e IRP613, notwithstanding the CPA issue.	This modification is aimed to prevent the early removal of Devices in the field that would be non-compliant with CPA recertification. It is expected that Devices that can be upgraded to 4.x series via firmware would be.
EUA Trade Association	Other SEC Party		There is significant cost to device manufactures if this is not implemented and moving forward, there will be a cost for MAPS and Suppliers if devices have to be prematurely removed due to non-compliance with CPA.	-

Question 6: Will your organisation incur any costs in implementing MP143?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	£100k - £250k	We expect there to be costs if we have to replace the meters, as mentioned in the previous question, but are confused by the fact that you are saying the CPA ramifications will be resolved with v3.3 but also resolved by v4.1 which brings into question why we would go to v3.3 being that v4.1 has the IRP613 fix in it. It is impossible to ascertain the financial values unless we can establish what will, and will not, need replacing or upgrading and the upgrade path we need to follow?	See response to question 5.
EUA Trade Association	Other SEC Party	N/A	-	-

Question 7: How long from the point of approval would your organisation need to implement MP143?

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	N/A	We would not be implementing MP143, it would be up to our manufacturers to provide us with the FW that complies with v3.3, although we still have queries of what that means to v4.1 and the impact on the DCC Comms Hubs because the modification report conflicts with itself on that matter. Mentioned above.	-
EUA Trade Association	Other SEC Party	Implementation ASAP	Manufacturers who have implemented this functionality, through industry need / consultation, are at risk of CPA failure at any point because due to the lack of this specification documentation update for GBCS v3 (this concern was highlighted in early 2021). Therefore, given the tightening of the CPA spec to 1.4 and ongoing assessments, delays to this specification update is increasing the risk and therefore EUA recommends implementation as soon as possible.	-

Question 8: Do you believe that MP143 would better facilitate the General SEC Objectives?

Question 8				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	Yes	But so does v4.1 which contains the IRP613 fix we are waiting for.	-
EUA Trade Association	Other SEC Party	Yes	It is important that GBCS v3.x is updated to allow devices to remain CPA compatible (these are documentation changes only)	-

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP143 is implemented?

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	Yes	The only benefits would be in us not needing to replace devices in their properties that are completely fine to the customer and the associated costs incurred as a result of this that not being passed on either directly or indirectly.	-
EUA Trade Association	Other SEC Party	No	There is no impact on consumers. There is likely to be a negative impact if not approved with the increased risk of early asset replacement and associated increased costs to suppliers and MAPS who would have to replace devices if CPA accreditation is revoked.	-

Question 10: Noting the costs and benefits of this modification, do you believe MP143 should be approved?

Question 10				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
OVO	Large Supplier	No	At this time, although we understand the rationale for needing v3.3, we have concerns of potential delays to v4.1 and the non-inclusion of IRP613. The noninclusion of IRP613 was due to not getting into the Nov 2021 release, which has already passed. We are still questioning why IRP613 is not part of this modification. We are fully sympathetic to the challenges of Manufacturers meeting CPA requirements, but from a Supplier perspective those aren't material to us and IRP613 is.	See previous responses
EUA Trade Association	Other SEC Party	Yes	As outlined above, this MP and associated IRPs within the scope of this modification, are Non-DCC System impacting, but are required to be incorporating into GBCS v3.x. These IRPs are essential to ensure any devices, which are built to GBCS v3.x, remain compliant to GBCS and therefore remain Commercial Product Assurance (CPA) compliant. It should be noted these IRPs and associated details have been worked through TSIRs and they have already been incorporated into GBCS v4.x and have been implemented under BEIS direction.	-

Question 11: Please provide any further comments you may have

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
OVO	Large Supplier	N/A	-
EUA Trade Association	Other SEC Party	-	-