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MP170 ‘Firmware updates to Point to Point Alt HAN Devices’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP170 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	We believe the ability to update all smart devices OTA is essential both for security of supply and security of the network.	-
Shell Energy	Large Supplier	No	<p>The proposed solution is written with respect to whether the requirements in Annex A are DCC impacting. Where a requirement is not DCC impacting then the solution is not described that meets the requirement. Therefore, it is not possible to know if the solution meets the requirements. However, we believe that where the requirement is indicated as not impacting DCC then this would be for Suppliers and AlthANCo to clarify and resolve.</p> <p>We are supportive of the proposed solution but believe that the framing of the modification and supporting documentation should be more widely scoped and described as a modification to support the Alt HAN solution more generally rather than limited to firmware upgrades.</p>	<p>That is correct, where requirements do not impact on DCC it would be up to the relevant SEC Party to implement a solution. AlthANCo are happy to support and discuss any specific processes.</p> <p>This modification is specifically related to the Over-The-Air (OTA) firmware upgrades requested for Alt HAN Devices and SEC processes to support this.</p> <p>Separately any processes Alt HAN would undertake in advance of this with Relevant Suppliers would be captured within Alt HAN Governance (and agreed with the Alt HAN Forum). Any suggested changes to</p>

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>We also take this opportunity to comment on the completeness or relevance of the requirements more generally, as part of this refinement consultation.</p> <ol style="list-style-type: none"> 1. We question why Requirement Ref.3 is required if Requirement Ref.4 is met by the DCC. Ref 4. has an efficiency advantage of providing a single firmware report across the entire installed Alt HAN devices to Alt HAN Co, rather than dependent on the entirety of all suppliers providing timely reporting for a complete position to be known at any one point in time by Alt HAN Co. 2. Further to Requirement Ref.4, an additional requirement on AltHANCo would be to update its Alt HAN Inventory (AHI) on the basis of the DCC report (and allow for such updating within its OSP interfaces and processes) where it shows a discrepancy with existing firmware position held in the AHI (assuming that the firmware version is an attribute maintained in the AHI). 3. There is an implied high-level requirement that should be added to the Annex A Business requirements table (Ref 1.5 between existing Ref 1 and Ref 2.) "Alt HAN to make firmware images and release notes available and securely for both 	<p>this scope can be raised directly with AltHANCo for discussion.</p> <ol style="list-style-type: none"> 1. The Proposer believes that there would be benefit in having both reports to ensure the accuracy of the data. This can be explored further if Suppliers feel strongly that one report is not necessary. 2. The reporting would allow discrepancies within the submissions to be investigated and updated accordingly. This would be done in conjunction with Suppliers. 3. AltHANCo will make release notes and firmware images available to Relevant Suppliers/SEC Parties.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>test and production environments to Suppliers or their managed service providers.” Impacted Party: AltHANCo/Suppliers”. Again the secure distribution of firmware information could be the responsibility of the AltHANCo’s OSP to meet this requirement.</p> <p>4. Requirement Ref 9 is described as non-DCC impacting, but we would ask whether the Requirement 4 DCC report should be structured in such a way to aid uploading and further firmware reporting, including ‘out of sync’ issues, by Alt HAN Co (and its OSP). So, could impact DCC. For example, report details should include the P2P devices details such as status, device ID, manufacturer, model and current active firmware version, and the new PPMID model variant, (as held by SMI, and as retrieved via SRV8.2) associated with the Comms Hub and linked to a MPAN/MPRN pair (where gas is supplied, else MPAN only). Alt HAN Co would then be able to identify ‘out of synch’ instances of firmware across P2P devices at specific installations, to aid Suppliers in firmware deployment assistance, as well as for any specific triage issues, recognising that being out of synch may be due to being missed in the firmware roll out; firmware upgrade</p>	<p>4. Requirement 9 was aimed to ensure that the Devices themselves will operate correctly on different firmware versions.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>still in progress; WAN or HAN or CH comms, device, or firmware updating issues. Further consideration, on linking various DCC reports, not just SMI, but also performance issues, to Alt HAN device and firmware issues may produce more requirements on DCC (part of this could be indicated in Annex C Section 4.1.1.5 Impact on DCC TOC, but the requirements are unclear).</p> <p>We are also not clear, from the Annex C DCC PIA, if the ESI reports cited (under Section 4.1.1.1) and the changes to these to incorporate the SMETS Variant Type (Alt HAN Device Variant) would be sufficient.</p> <p>Finally, we note that Annex A Section 3.2.2. (Acting as a PPMID) states “DCC to document any constraints such as this [loss of Alt HAN service following TCSO] as part of their assessment given the expectation that this option would minimise DCC development effort within the CSP solution.” However, we see no reference to such constraints or issues, albeit at a high level at this preliminary stage, in the Annex C Preliminary Assessment by DCC. Therefore, it is not possible to be confident that the solution “will effectively resolve the identified issue “.</p>	<p>The specific data items within the DCC reporting requirements are not yet defined.</p> <p>The DCC confirmed in a subsequent Working Group that there is no solution to this issue.</p>
AltHanCo	Other	Yes	Modifying the SEC to support remote firmware updates to Alt HAN P2P devices would allow necessary security and functional upgrades to be made and defects to be	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			remedied using over-the-air (OTA) functionality, allowing for a time sensitive solution which mitigates costs for device replacement.	
Utilita Energy Limited	Large Supplier	Yes	Whilst we agree the solution would provide the ability to update P2P Alt HAN Devices, we do have some concerns with the cost of this modification which are discussed in further detail in response to Q9.	-
British Gas	Large Supplier	Yes	This is a “must have” for the industry, and the approach seems sensible.	-
E.ON UK	Large Supplier	Yes	This route forward would accommodate OTA to the Alt-HAN devices	-

Question 2: Do you agree that the legal text will deliver MP170?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	We believe the legal text will deliver the change but are not clear on whether this will mean the device would be required to go through CPA. Either way we support the change but if CPA is required for Alt-HAN equipment it would require a change to how Alt-HAN equipment is pre-notified to DCC which Alt-HAN Co. would need to be conscious of.	As PPMIDs do not require CPA certification it is envisaged that the Alt HAN Devices will also not need this. For the avoidance of doubt this will be clarified by the Security Sub-Committee.
Shell Energy	Large Supplier	No	We believe that Annex B sets out the required changes to Appendix AD. However, we would like to clarify if the SEC legal text outside of the Appendix AD changes allows for the delivery and operation of the requirements, particularly regarding interactions directly between DCC and Alt HAN Co, such as the provision of reports, or service support and communication of issues, outages, incidents, etc. Are these adequately described in SEC, with obligations and expectations clearly set out regarding these interactions between DCC and Alt HAN Co, even if limited to Alt HAN device firmware issues?	The DCC currently provides AltHANCo with monthly reports that are not defined within the SEC and the expectation would be that this report is added to that reporting suite without the need for legal text changes.
AltHanCo	Other	Yes	The text reflects the necessary changes that are required to ensure the Alt HAN devices are recognised as distinct devices and can be targeted for OTA upgrades using existing functionality.	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	No comments on legal text.	-
British Gas	Large Supplier	Yes	Yes – seems appropriate, and I assume it has been prepared by the relevant specialist lawyers.	-
E.ON UK	Large Supplier	Yes	The legal text seems to cover the requirements	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	-	
Shell Energy	Large Supplier	No	<p>The approach to implementation does not address the potential issue where the required DCC changes are implemented after some Alt HAN Devices have been installed. We have assumed that this is feasible technically, as Alt HAN Devices could be entered onto CPL, and installed and commissioned as PPMIDs to existing Communication Hubs, without the proposed changes?</p> <p>We are also aware that the Alt HAN programme is replanning its development and mobilisation programme, with changes to its JIP milestones to be notified early in 2022, which may mean Alt HAN installs after the later release date of November 2024. However, if the DCC changes should be delayed and Alt HAN delivers earlier, what are the consequences? For example, Alt HAN installations before the proposed DCC changes, may require amendments / updates to the SMI entries for these earlier installations with the changes, such as “PPMID variant” being added. It may prudent therefore to set out such requirements, to a sufficient level of detail,</p>	<p>AltHANCo has confirmed that it is intended that Devices would be developed with the OTA capability in alignment with the implementation of the DCC changes to deliver the upgrades. However, if they join the HAN as a CAD before the DCC changes are implemented, then they will not be able to receive OTA upgrades.</p> <p>AltHANCo will provide guidance on these situations when Devices are approaching rollout.</p>

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			<p>for such a contingency, to allow inclusion in the DCC and wider stakeholder impact assessments.</p> <p>We would also note that there may be a typo in the dates shown for implementation date of 07 November 2024, where decision to approve is “received after 2 May 2022 but on or before 6 May 2023”, should read “received after 2 May 2023 but on or before 6 May 2024”.</p>	<p>Thank you for noting this. The Modification Report has been updated with this correction.</p>
AltHanCo	Other	Yes	Having discussed with DCC, its service providers and SEC groups, we believe this is the most pragmatic and cost-effective solution available.	
Utilita Energy Limited	Large Supplier	N/A	<p>If the cost of this modification could be fully justified then we would be in favour of this modification.</p> <p>The Bridge 1 Alt HAN Device is currently being re-designed. Delivery of a FW update solution could run in conjunction to this redesign activity, reducing the total costs associated with Alt HAN Device development. If ambiguity on a FW update solution to P2P Devices remains whilst Bridge 1 undergoes redesign, the device could be subject to requiring further development later to facilitate FW updates, which would cost industry more money.</p>	<p>The Bridge 1 Device is being redesigned to allow it to be connected to the Distribution Network, as opposed to after the meter. They are currently being designed to receive OTA firmware upgrades and join the HAN as a PPMID.</p>
British Gas	Large Supplier	Yes	Seems appropriate.	-
E.ON UK	Large Supplier	Yes	Option 1 is the preferred approach.	-

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Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			Option 2 requires much greater change to a variety of systems leading to increased cost and potential delay to implementation.	

Question 4: Will there be any impact on your organisation to implement MP170?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	MP170 will have a beneficial impact on our organisation. Should any high severity defects be found in the Alt HAN devices, an OTA firmware fix will remove the need for a costly and intrusive site visit to our consumers' premises to replace the current device with a new version. This mod will also protect the reputation of SMIP as a whole: having to replace devices would only damage the programme's reputation in the eyes of consumers and indeed the media. In addition, the ability to continue to develop new functionality and distribute it without costly site visits may prove to be most beneficial over the lifetime of the devices.	-
Shell Energy	Large Supplier	Yes	Changes include: DCC Adaptor and UI changes to manage and display PPMID Variants attribute; Firmware management and report changes to include Alt HAN Devices; Triage and back-office process and report changes to reference Alt HAN device status. Changes to third party systems, reports and processes are subject to change requests which would need to be raised. The 6 months' notice of change provided by the Mod Report Appendix 1: Progression Timetable, could be	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			sufficient, though this would be subject to other activities being planned for the same release period.	
AltHanCo	Other	Yes	<p>Energy Suppliers (on behalf of whom Alt HAN operates) will be directly impacted since MP170 is designed to upgrade Alt HAN devices. Alt HAN will plan its implementation activities in accordance with MP170 implementation timescales. We will develop processes that will ensure the OTA upgrade is planned with Energy Suppliers.</p> <p>We will develop processes that will ensure the OTA upgrade is planned with Energy Suppliers.</p>	-
Utilita Energy Limited	Large Supplier	Yes	This modification will require an update to systems and processes for us to notify, identify and differentiate between genuine PPMIDs and Alt HAN Devices which appear as PPMIDs.	-
British Gas	Large Supplier	Yes	At present our processes only work for updating meters remotely, and we will need to extend this to cover these pieces of equipment too. The effort would be subject to a broader internal impact assessment – low/medium effort expected.	-
E.ON UK	Large Supplier	Yes	Details are not known at this time.	-

Question 5: Will your organisation incur any costs in implementing MP170?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	No costs	-	-
Shell Energy	Large Supplier	Less than £100k	Assumption is that third party adaptor changes would, as a minimum, be incorporated as part of their normal budgeted product changes, already recovered via their fees.	-
AltHanCo	Other	Yes	There are costs associated with adapting the Alt HAN devices to receive OTA via DCC utilising DCC's solution requirements which will need to be approved by the Forum. By implementing MP170, Energy Suppliers will realise cost savings compared to the alternative of replacing devices or requiring site visits to deploy firmware upgrades.	-
Utilita Energy Limited	Large Supplier	Less than £100k	Costs will arise from development and testing of the solution.	-
British Gas	Large Supplier	Yes	Cost would be confirmed by an internal impact assessment.	-
E.ON UK	Large Supplier	Less than £100k	Details are not known at this time.	-

Question 6: How long from the point of approval would your organisation need to implement MP170?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	0	-	-
Shell Energy	Large Supplier	6 months minimum; 9 months preferred	Typical Product roadmap planning cycle timescales and prioritisation lead-in times for the estimated medium level change across internal and external systems.	-
AltHanCo	Other	Alt HAN would apply the functionality to devices in time for the Full rollout of the Alt HAN solution.	The Alt HAN devices will be upgradeable when the DCC systems take effect.	-
Utilita Energy Limited	Large Supplier	~6 months.	We would need this amount of time to develop the solution, make changes, mainly with pre-notification of Devices, then to test the solution works. We expect this to take around 6 months.	-

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Up to 3 months TBC (depending on active backlog at the time)	Educated estimate – would need confirming by internal impact assessment.	-
E.ON UK	Large Supplier	6 months	System changes to exploit the new functionality would take approximately 6 months to fulfil and test.	-

Question 7: Do you believe that MP170 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	-	-
Shell Energy	Large Supplier	Yes	Though with further refinement of MP170 as our earlier comments this can be improved upon.	-
AltHanCo	Other	Yes	<p>MP170 will facilitate several of the General SEC Objectives, namely:</p> <ul style="list-style-type: none"> h) facilitate the establishment and operation of the Alternative Home Area Network (Alt HAN) arrangements; <p>The ability to upgrade Alt HAN devices OTA ensures the maximum life of devices and avoids replacement should upgrades be required.</p> <ul style="list-style-type: none"> a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain; and <p>The ability to upgrade Alt HAN devices OTA ensures the maximum life of devices and avoids replacement should upgrades be required.</p> <ul style="list-style-type: none"> c) Facilitate energy consumers' management of their use of electricity and gas through the 	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<p>provision of appropriate information via smart metering systems.</p> <p>The ability to upgrade Alt HAN devices OTA ensures the maximum life of devices and avoids replacement allowing continued access to smart benefits for energy consumers.</p>	
Utilita Energy Limited	Large Supplier	Yes	SEC objective A – the modification allows updating of Alt HAN P2P Device firmware remotely to address any potential issues, which would otherwise require site visit for replacement. This equates to cost, time and operational efficiencies in the management of Smart Metering Systems	-
British Gas	Large Supplier	Yes	We agree that this modification will better facilitate SEC Objective “a”.	-
E.ON UK	Large Supplier	Yes	Facilitates SEC Objective (a) in line with the proposer’s comments	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP170 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	The consumer will be better protected should any firmware defects be discovered post-installation in the Alt HAN devices. The ability to supply functional and security fixes OTA will benefit the consumer. In addition, the ability to remotely fix defects in the Alt HAN devices will remove the inconvenience of a visit to replace existing installed kit. Finally, consumers could also benefit from continued firmware development and improvement, without the need for site visits.	-
Shell Energy	Large Supplier	Yes	We agree with the comments regarding this area noted in the mod report.	-
AltHanCo	Other	Yes	Consumers will be positively impacted since MP170 would limit the need for site visits for the deployment of firmware upgrades which often cause disruption, while allowing consumers to benefit from security fixes and new innovative upgrades in more a timely manner. In addition, consumers would indirectly benefit from MP170 because without this modification, higher cost of deploying firmware upgrades may ultimately be passed on to the consumer.	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Limited	Large Supplier	Yes	Reduces the need for site visits to address issues which could be resolved OTA	-
British Gas	Large Supplier	Yes	It will remove the requirement for customer home visits when an update is required.	-
E.ON UK	Large Supplier	Yes	Providing this OTA update capability would benefit customers with increased functionality/security without a physical visit, and provide longevity of the customer solution.	-

Question 9: Noting the costs and benefits of this modification, do you believe MP170 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	-	-
Shell Energy	Large Supplier	No	We believe that further refinement, clarifications, and improvements addressing the comments raised are required.	The Proposer has noted your comments and will provide further clarification in addition to the above responses as required.
AltHanCo	Other	Yes	The benefits of this modification to Energy Suppliers from a cost savings, time efficiency and risk mitigation perspective coupled with the benefits to consumers from reduced inconvenience outweigh the minimal costs associated with making this modification.	-
Utilita Energy Limited	Large Supplier	-	<p>We note the benefits that would arise from having an OTA solution in place. However, the DCC costs for implementing this modification appear excessive. Much of the functionality required for this solution already exists, and cost of change appears to be largely related to an ability to differentiate between genuine PPMIDs and Alt HAN Devices appearing as PPMIDs.</p> <p>It is difficult to justify a spend of £636,000 up to PIT for what appears to be a relatively minimal change. We would welcome more clarity on these costs and the DCC</p>	The DCC Impact Assessment will give a clearer indication of cost and these will be robustly challenged as part of the process.

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			challenging its Service Providers costs to ensure industry is receiving value for money.	
British Gas	Large Supplier	Yes	"Must Have" for industry	-
E.ON UK	Large Supplier	Yes	In line with responses above. However, it was not clear what the additional CSP costs would be (if any).	CSP costs will be clearly defined in the DCC Impact Assessment.

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
OVO	Large Supplier	No further comments	-
Shell Energy	Large Supplier	None.	-
AltHanCo	Other	-	-
Utilita Energy Limited	Large Supplier	No further comments	-
British Gas	Large Supplier	-	-
E.ON UK	Large Supplier	N/A	-