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# MP143 ‘Incorporating IRPs into GBCS v3 series’

## Annex D

## Refinement Consultation responses

### About this document

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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
<b>OVO</b>	Large Supplier	Yes	However, in fixing this it causes other problems which are covered in other questions	-
<b>EUA Trade Association</b>	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	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ol>	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>3. SECAS has been given assurances that the DCC would be able to meet the relevant</li> </ol>

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
			the GBCS version 4.x series would have Communications Hub impacts.”	<p>deadlines to ensure this modification can be implemented in November 2022.</p> <p>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.</p>
<b>EUA Trade Association</b>	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	<p>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.</p> <p>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?</p>	-
EUA Trade Association	Other SEC Party	No	<p>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.</p>	-

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

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO</b>	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.
<b>EUA Trade Association</b>	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
<b>OVO</b>	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.
<b>EUA Trade Association</b>	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
<b>OVO</b>	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.	-
<b>EUA Trade Association</b>	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
<b>OVO</b>	Large Supplier	Yes	But so does v4.1 which contains the IRP613 fix we are waiting for.	-
<b>EUA Trade Association</b>	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
<b>OVO</b>	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
<b>EUA Trade Association</b>	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	-	-