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MP102B ‘Power Outage Alerts triggered by an OTA firmware upgrade – enduring solution’

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP102B Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	<p>Implementing either solution will come with a risk that a genuine power outage that occurs within the suppression window will not have an AD1 alert generated and subsequently sent through to the DNO. However, we believe that both the Proposed and Alternative Solution will help to alleviate the issue identified and the benefit outweighs this specific risk.</p> <p>As a result we prefer the alternative solution for this reason, as it further reduces the risk of suppressing genuine power outage alerts, however the PIA doesn't clearly show the cost difference in the two proposed solutions so we are unable to make a completely informed decision.</p>	-
E.ON	Large Supplier	Yes	<p>Preference for only blocking the POAs from the fixed list of 1.4 million affected ESME GUIDs. The majority of L+G ESMEs are not affected, and there is a possibility that a small but possibly significant number of genuine POAs will be blocked if all L+G ESMEs are in scope.</p>	-
Electricity North West Ltd	Network Party	Yes	<p>The 2nd option adds some additional complexity for DCC and L&G in maintaining the list of affected device GUIDs</p>	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			but there is no direct impact to ourselves between the two options proposed.	
Scottish and Southern Electricity Networks	Network Party	Yes	As we understand the impacted manufacturer and the scenario in which the spurious outage alerts are created, we believe that this solution will resolve the issue.	-
UK Power Networks	Network Party	Yes	<p>UK Power Networks agrees that both the Proposed and the Alternative solution will effectively resolve the identified issue of POAs being generated when an “over-the-air” firmware update is activated on particular L&G ESMEs, where the ESME reboot time exceeds three minutes and interrupts the power supply to the communications hub.</p> <p>The suppression of POAs generated by an OTA firmware update will reduce the risk of customer inconvenience and also support Network Parties to avoid incurring additional costs.</p> <p>If this issue is not addressed:</p> <ul style="list-style-type: none"> • DNOs will either need to check the energisation status of each meter from which a POA is received (by means of a ping), or • DNOs will need to send a member of staff to site to investigate, if the ping was unsuccessful. 	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			We believe that the Alternative Solution, though similar to the Proposed Solution, is straightforward and a better option because it tracks firmware update activation requests for devices listed by L&G as not working in the desired manner. If in the future other ESMEs were identified as causing the same issue, then their GUID reference numbers could be added to the GUID list.	

Question 2: Do you agree with the proposed implementation approach?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We support the solution being implemented ASAP. For clarity does this mean that there will be no technical uplift in November 2023 as this is happening in June instead?	At this time, the November 2023 SEC Release will prioritise the implementation (if approved) of MP162 'SEC changes required to deliver MHHS' . Other Technical Specifications-impacting modifications will be implemented as part of the June 2023 SEC Release.
E.ON	Large Supplier	Yes	It is a straightforward, logical implementation approach.	-
Electricity North West Ltd	Network Party	Yes	It is important that the quality and reliability of Power Outage Alerts be as high as possible. An implementation date of 29 June 2023 must be the target.	-
Scottish and Southern Electricity Networks	Network Party	Yes	As the spurious alerts are not identifiable by Network Parties, an earlier release would be preferable.	-
UK Power Networks	Network Party	Yes	We agree with the implementation approach as recommended by SECAS for an implementation date of 29 June 2023 (June 2023 SEC Release) if a decision to approve is received on or before 27 October 2022. We also believe that options should also be explored to bring the implementation date forward to minimise the	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			impact on customers and to avoid additional costs for Network Parties as outlined in our response to Question 1.	

Question 3: Will there be any impact on your organisation to implement MP102B?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We have already designed our systems to try and work around the spurious AD1s generated as a result of a POA. We will be impacted by this modification as we will need to re-evaluate our processes and potentially update our systems accordingly.	-
E.ON	Large Supplier	No	This does not have any work impact on Suppliers. L+G can provide the list of GUIDs required.	-
Electricity North West Ltd	Network Party	No	The implementation of MP102B will reduce the volume of erroneous alerts arriving at our gateway.	-
Scottish and Southern Electricity Networks	Network Party	No	No implementation effort required.	-
UK Power Networks	Network Party	Yes	There will be a positive impact on UK Power Networks if MP102B is implemented as it is a long-awaited resolution to an issue that is delaying full integration of POAs into our BAU processes. However, there will be an adverse impact on UK Power Networks if the implementation date of 29 June 2023 is not met because it will delay further our ability to reliably use the POAs within our business processes.	-

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Question 4: Will your organisation incur any costs in implementing MP102B?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We would potentially incur costs as a result of this modification as we will need to re-evaluate our processes and potentially update our systems accordingly. Until we know exactly what the solution is we won't know what will be involved, however these costs would not outweigh the benefits of this modification.	-
E.ON	Large Supplier	No costs, apart from the DCC bill shared amongst all parties!	No impact to Suppliers.	-
Electricity North West Ltd	Network Party	No costs	The implementation of MP102B will reduce the volume of erroneous alerts arriving at our gateway.	-
Scottish and Southern Electricity Networks	Network Party	No costs	No comments.	-
UK Power Networks	Network Party	Yes	If the identified issue continues because the modification is not implemented, UK Power Networks will be required to develop/continue processes to mitigate risks from the	-

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			spurious POAs adversely affecting any benefits we could deliver to our customers. There will be a cost for further development to enhance and implement our POA filter that we estimate being between £100k to £250k.	

Question 5: How long from the point of approval would your organisation need to implement MP102B?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	N/A	No comment.	-
E.ON	Large Supplier	N/A	This does not have any work impact on Suppliers.	-
Electricity North West Ltd	Network Party	N/A	The implementation of MP102B will reduce the volume of erroneous alerts arriving at our gateway.	-
Scottish and Southern Electricity Networks	Network Party	N/A	No comment.	-
UK Power Networks	Network Party	See below	From the point of approval of MP102B we may require a short period of time to review our BAU processes and implement any changes identified for managing power cuts at single premises on receipt of a POA.	-

Question 6: Do you believe that MP102B would better facilitate the General SEC Objectives?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	We believe that this modification better facilitates SEC Objective (a) by ensuring efficient operation of the Smart Metering Systems at Energy Consumer's premises.	-
E.ON	Large Supplier	Yes	This solution facilitates the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.	-
Electricity North West Ltd	Network Party	Yes	<p>Reducing the volume of non-genuine AD1 alerts will:</p> <ul style="list-style-type: none"> Remove the need for additional activity/traffic on the smart meter communications system that would be associated with addition service requests to ascertain the status of the supply; Reduce the risk that ENWL would need to make telephone contact with the customer (with the associated cost and use of valuable resource) to ascertain if they were off supply. This can cause distress if the customer is not at home and they do not know if their supply is off; and Reduce the risk that ENWL would need to attend site (with the associated cost and use of valuable resource) to ascertain the status of the supply. 	-

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	We believe that this will better facilitate SEC objective (a) as detailed in the modification report.	-
UK Power Networks	Network Party	Yes	<p>We agree with the proposers views of this modification, which will reduce the non-genuine AD1 alerts, that it will better facilitate the General SEC Objectives as set out in Section C1, in particular:</p> <ul style="list-style-type: none"> the first General SEC Objective, namely to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain. <p>In addition;</p> <ul style="list-style-type: none"> the fifth General SEC Objective, namely to facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy; 	-

Question 7: Do you believe there will be any impacts on or benefits to consumers if MP102B is implemented?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	This modification will help DNOs to more accurately identify when there is a genuine Power Outage rather than a spurious alert. It will also result in the DNOs not having to visit consumers' properties to check they have supply as a result of a firmware upgrade.	-
E.ON	Large Supplier	Yes	The DNO should be able to handle power outage alerts in a more efficient way and therefore be more responsive to real customer power outages.	-
Electricity North West Ltd	Network Party	Yes	The impact on consumers are all benefits. See response to question 6.	-
Scottish and Southern Electricity Networks	Network Party	Yes	We believe that customers are positively impacted by this modification as it will improve the trustworthiness of the power outage alerts received by DNOs.	-
UK Power Networks	Network Party	Yes	We believe our customers will benefit from the implementation of MP102B because it will ensure we are not sent spurious AD1 alerts from an OTA firmware update and are made aware when there is a genuine Power Outage. This will enable us to take proactive action	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			<p>to quickly restore the power supply to our customers and provide a high level of customer service.</p> <p>It will also ensure we do not have to unnecessarily visit customers' properties to check their electricity supply where a spurious notification would have previously been received.</p>	

Question 8: Noting the costs and benefits of this modification, do you believe MP102B should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	Whilst we believe that this modification should be approved, we wish to better understand the difference in costs between the two options to gain a clear understanding of the cost/benefit case for each to make an informed decision on which option to progress.	-
E.ON	Large Supplier	Yes	The costs from DCC seem on the high side (as usual) for what is a straightforward change for a software company. However, quenching the erroneous Power Outage Alerts at the earliest point is the most efficient way of dealing with this issue, rather than those alerts percolating their way through the DCC to the DNO. Based on 2 ESME firmware upgrades per year, up to 2.8 million erroneous alerts can be quenched.	-
Electricity North West Ltd	Network Party	Yes	It will provide an enduring solution to an issue that has the potential to negatively impact the operation of the smart metering system for many years into the future and one which might only be resolved otherwise by the replacement of the electricity meter.	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	As this will resolve the issue of spurious alerts from devices that cannot be fixed remotely through firmware, we believe this modification should be approved.	-
UK Power Networks	Network Party	Yes	We believe MP102B should be implemented as soon as possible because this is a long-awaited resolution to an issue that is delaying our ability to fully deliver benefits to customers from the use of POAs.	-

Question 9: Please provide any further comments you may have

Question 9			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	<p>We note the SEC Modification Report calls the solutions the 'Proposed Solution' and the 'Alternative Solution', but the DCC IA uses the phrases 'Core Solution' and 'Enhanced Solution'. For ease going forward it would be useful if these were referenced in a consistent manner.</p> <p>We also note that in the PIA it states that there will be no changes to reporting as a result of this change. We would like to understand if there is a need to report on the number of AD1s that have been suppressed as a result of this change. We would also like to understand exactly if/how any of these AD1s will show/be excluded in DCC reporting.</p>	The Modification Report will be updated to progress the Alternative / Enhanced Solution. This will become the Proposed Solution and the previous solution relating to the suppression of POAs for all L+G Devices will be discarded. The decision will also be captured within the Modification Report.
E.ON	Large Supplier	No comment.	-
Electricity North West Ltd	Network Party	No comment.	-
Scottish and Southern Electricity Networks	Network Party	No comment.	-
UK Power Networks	Network Party	The principle being employed in this proposal to suppress spurious AD1 alerts generated by OTA firmware updates is good because it prevents spurious AD1 alerts being received by the Network Party. We	-

Question 9			
Respondent	Category	Comments	SECAS Response
		believe that this principle of using device GUIDs could be further developed and utilised by the DCC to suppress other types of spurious alerts, for example, from known “chatty” ESMEs generating high volumes of spurious alerts or for other manufacturer/model combinations which send spurious POAs.	