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# MP172 ‘Reduced CPA & CPL requirements for innovation and Device field trials’ Refinement Consultation responses

## About this document

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This document contains the full collated responses received to the MP172 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
Scottish and Southern Electricity Networks	Network Party	Yes	The solution will effectively resolve the identified issue as this should free up resources for all SEC parties.	-
Shell Energy	Large Supplier	Yes	As part of the Working Group review, we managed to challenge and get removed unnecessary DCC processes and costs being proposed. This is now a suitably risk-balanced approach, suitably lightweight and as a document only modification it can be more effectively implemented.	-
Electricity North West Limited	Network Party	Yes	We are supportive of the principle for this change. We agree that devices have been deployed at high volume in the live network with issues that normally would have been easily spotted during a limited volume live field trial. As a Network Operator we have seen this happen and it is a long winded and frustrating process trying to get meter defects resolved once they are deployed.  We recommend some form of DCC reporting to track/monitor trial deployments so that all parties can be	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			aware of new devices being deployed and some form of limitation on how many trial devices can be deployed.	
<b>E.ON</b>	Large Supplier	Yes	-	-
<b>Western Power Distribution</b>	Network Party	Yes		-
<b>British Gas</b>	Large Supplier	No	<p>Effectively this modification proposal has two objectives:</p> <ol style="list-style-type: none"> <li>1. Finding issues in a production environment before we go to mass volumes, and</li> <li>2. Encouraging innovation by putting test firmware out into a real life situation, before going through the complication of the CPA process</li> </ol> <p>On the first point, we don't agree that testing 100 devices in Production would pick up some of the issues that we've seen in production at volume. Some problems only appear in 0.3% of installs, which would mean that at most 1 device would fail during the production test period, which could be seen as negligible or a one-off problem.</p> <p>On the second point, whilst we agree with encouraging innovation, the modification appears to be addressing an issue with the CPA assurance process taking too long/being too costly to encourage it. We agree the CPA process is tough for manufacturers trying to get product through approvals, whilst Suppliers are champing at the bit to get the fixes that it brings as soon as possible.</p>	<p>SECAS notes that it is not likely to identify all Device issues via a small scale trial, however being able to place Devices in real world settings will also demonstrate how Consumers will use Devices and can aid Device Manufacturers in identifying issues themselves with the product.</p> <p>The full CPA assurance process has been under review and amendments made to the scheme by the NCSC. Whilst there is always more work that can be done to improve there are fundamentally different risks to cater for a small-scale trial as opposed to mass deployment and there needs to be a process to deliver small scale trials to aid innovation.</p>

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			However, we should be tackling the issues in the CPA process instead of finding ways around it. We also note that the SSC retains the right to refer to NCSC if they're not sure whether to approve a trial or not. That sounds like CPA by another name, so would end up defeating the object of the exercise.	

## Question 2: Do you agree that the legal text will deliver MP172?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
<b>Scottish and Southern Electricity Networks</b>	Network Party	No	While reviewing the legal text there is no reference to the obligation of updating Network Operator certificates as the legal text changes are not proposing any amendments to SEC Appendix AC Section 6.2 (b) and SEC Appendix AC Section 5.3 (a) which do not address trial devices we feel this legal text does not provide enough detail to deliver this modification.	SECAS notes that keeping the section self-contained with regards the Trial Devices does not impact all other clauses within the SEC that will apply to those Device Types. This was a simpler solution than finding every obligation and specifying it included Trial Devices and was proposed by the SECAS lawyers.  Appendix AC, section 5.3 (a), will apply to all SMETS 2 Devices, regardless of whether they have a CPA Certificate or a Trial Certificate. For Appendix AC, section 6.2 (b), although this logic would still apply, the Trials are only open to SMETS2+ Devices (specified in the first new proposed clause, F2.18).
<b>Shell Energy</b>	Large Supplier	Yes	It achieves outcomes expected	-
<b>Electricity North West Limited</b>	Network Party	Yes	-	-
<b>E.ON</b>	Large Supplier	Yes	-	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	-	
British Gas	Large Supplier	N/A	We have not reviewed the legal text at this stage.	-

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN agree with the implementation approach as detailed within the modification report.	-
Shell Energy	Large Supplier	No	Without further investigation, we assume that Feb 2023 really is the quickest that a “document only modification” can take?!	-
Electricity North West Limited	Network Party	Yes	-	-
E.ON	Large Supplier	Yes	-	-
Western Power Distribution	Network Party	Yes	-	-
British Gas	Large Supplier	No	See our answer to question 1.	-

## Question 4: Will there be any impact on your organisation to implement MP172?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
<b>Scottish and Southern Electricity Networks</b>	Network Party	Yes	Although not directly impacted by the new process proposed if the correct Network Party certificates are not installed, we will not be able to communicate with this device.	As noted above, all existing obligations to place Certificates on Devices will still be applicable to Trial Devices.
<b>Shell Energy</b>	Large Supplier	Yes	Proposals for innovative device development and trials wont now flounder on the need for full CPA.	-
<b>Electricity North West Limited</b>	Network Party	No	-	-
<b>E.ON</b>	Large Supplier	Yes	If E.ON decide to participate in any trials then we would have to follow this process. Likewise, if a customer who is part of a trial churns into E.ON, we would need to monitor the status of any assets that are part of the trials, and possibly remedy any withdrawals from the SSC by removing them.	-
<b>Western Power Distribution</b>	Network Party	Yes	We believe that will be impacted by the potential for Devices that have not been through full CPA Certification to be installed on their networks at consumer properties.	-
<b>British Gas</b>	Large Supplier	N/A	Not yet assessed.	-



## Question 5: Will your organisation incur any costs in implementing MP172?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	No costs	N/A	-
Shell Energy	Large Supplier	Less than £100k	People time in engagement with SSC for any Device Trial applications	-
Electricity North West Limited	Network Party	No costs	-	-
E.ON	Large Supplier	No costs	-	-
Western Power Distribution	Network Party	No costs	There will be no additional costs to implement this further to the central costs.	-
British Gas	Large Supplier	N/A	Not yet assessed.	-

## Question 6: How long from the point of approval would your organisation need to implement MP172?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	N/A	N/A	-
Shell Energy	Large Supplier	None	Implementation effort would only be expended if and when a device trial application is needed	-
Electricity North West Limited	Network Party	N/A	-	-
E.ON	Large Supplier	N/A	This is manufacturer driven.	-
Western Power Distribution	Network Party	-	-	-
British Gas	Large Supplier	N/A	Not yet assessed.	-

## Question 7: Do you believe that MP172 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	We agree that this modification improves the efficiency of approving a device onto the CPL which relates to SEC Objective (a).	-
Shell Energy	Large Supplier	Yes	As set out in consultation	-
Electricity North West Limited	Network Party	Yes	We believe this would better facilitates SEC objective (a) for the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.	-
E.ON	Large Supplier	Yes	We align with the Proposers views of meeting objectives A and E, and such trials may also support objective C	-
Western Power Distribution	Network Party	Yes	We believe that this modification will better facilitates SEC Objective (a) and (e) by allowing Device Manufacturers to drive innovation and develop products that would benefit consumers and industry.	-
British Gas	Large Supplier	No	-	-

## Question 8: Do you believe there will be any impacts on or benefits to consumers if MP172 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	This modification should improve the efficiency and innovation of future devices that will be installed in consumers premises.	-
Shell Energy	Large Supplier	Yes	Benefits could flow from services that use these innovative devices once successfully developed and tested	-
Electricity North West Limited	Network Party	-	-	-
E.ON	Large Supplier	Yes	May support the quicker and more robust introduction of innovative products into the smart metering system to support consumers energy management.	-
Western Power Distribution	Network Party	Yes	We believe that consumers will only be impacted if they choose to be involved in a trial to have a Device placed at their premises.	-
British Gas	Large Supplier	No	There need to be more thought given to the individual customers selected to receive the 'reduced CPA & CPL' devices? Consumers would normally expect any metering asset installed in their property to have the full 'industry standard' protection of the CPA/CPL. This won't	Responsibility for the selection of end consumers will rest with the supporting Supplier. SECAS notes these will need to include agreement for disconnection of

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			just be a matter of adding 'small print' to the Ts & Cs, but ensuring the home owner (and occupier), and any future owner / occupier, are fully aware of what they are saying 'yes' to.	Devices should a consumer wish to cease taking part in the trial.

## Question 9: Noting the costs and benefits of this modification, do you believe MP172 should be approved?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN agree with the costs as detailed within the modification report.	-
Shell Energy	Large Supplier	Yes	As noted in the consultation report	-
Electricity North West Limited	Network Party	Yes	See our response to Q1 and Q7	-
E.ON	Large Supplier	Yes	-	-
Western Power Distribution	Network Party	Yes	-	-
British Gas	Large Supplier	No	We are nervous about this proposal, and are not sure why products can't be validated in existing test environments – such as DCC lab / DCC Boxed.	Devices can be tested initially in these environments to identify technical bugs but they are not a replica of being used in the real world which provides richer data. This can also help prove new technologies benefit consumers as well as identify defects.

## Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	SECAS Response
<b>Scottish and Southern Electricity Networks</b>	Network Party	As SMDA has adopted use cases that test Network Party functionality against ESME devices. We believe it would be beneficial to include Network Parties in the field trials or live usage trials to highlight any Network Party related issues that may be present in trial devices.	Trial Devices will be listed on the CPL for all Parties to view and identify. Any feedback on Trial Devices can be provided to the Responsible Supplier for passing on.
<b>Shell Energy</b>	Large Supplier	-	-
<b>Electricity North West Limited</b>	Network Party	-	-
<b>E.ON</b>	Large Supplier	Given the increased risk of cyber attacks in recent times, and the potential impacts to households if such devices without thorough approvals were to be compromised, we want to emphasis the importance on limited volumes being accepted for trial. We trust the SSC's judgment on an appropriate trial volume, and trial period, to limit these impacts, because if such attacks were to take place, there could be huge implications from negative press on the expansion of the smart metering system for other uses.	The recommendation is upto 100 Devices over a period of 18 months. The legal text has not been explicit to allow the SSC to adjust these as they see fit.
<b>Western Power Distribution</b>	Network Party	-	-
<b>British Gas</b>	Large Supplier	While we support innovation and the development of new devices, we are nervous about this proposal, and are not sure why products can't	As noted above, being able to place Devices in real world settings will also demonstrate how Consumers will use

Question 10			
Respondent	Category	Comments	SECAS Response
		<p>be validated in existing text environments – such as DCC lab / DCC Boxed.</p> <p>We are surprised there hasn't been more push back from the SSC, beyond requesting the addition of the 'trial' flag.</p> <p>It will also be important to get input and feedback from the various MAPs – would they be happy to acquire such assets without full CPA/CPL, even at trial volumes?</p> <p>What happens if there is a change of supplier after the trial asset has been installed? There may be the intention to avoid this as much as possible, but some change of suppliers during the trial period may still happen.</p> <p>What happens to the asset once the trial has ended?</p>	<p>Devices and can aid Device Manufacturers in identifying issues themselves with the product.</p> <p>MAPs would hold a commercial relationship with the Device Manufacturer and the Supplier as part of the trial to place the Devices in these homes.</p> <p>In a Change of Supply situation, the new Supplier can arrange removal of the Device if they or the consumer wish to.</p> <p>Once the trial has ended the Device will either be removed, or upgraded to a fully CPA Certified version.</p>