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MP155 ‘Communications Hub Re-Flash’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP155 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
British Gas	Large Supplier	No	<p>We agree that the solution as described will deliver a process to enable Suppliers to request a CHF re-flash on unused devices, which does not currently exist apart from the specific Northern capability in relation to 1.37.7 & 1.38.3 firmware.</p> <p>We also agree that the process change will enable C&S to receive, process and return the same batch of hubs to the requesting Supplier, which is not current practice in that region.</p> <p>However, we do not agree that the solution will deliver a volume process capable of processing ~300k devices within a 12-month period.</p> <p>The suggested solution does not define what the current throughput is for the Northern hubs; it only states that the new multi-jig solution in C&S would only be capable of handling 8 hubs in parallel (3 jibs x 8 hubs per jig). There is no estimate for the length of time each 'batch' of hubs would take to mount on the jig and then upgrade, so it's impossible to determine the turnaround time from request to return of the hubs to Suppliers. Whether the throughput is achievable or not is unknown without</p>	DCC will provide a response to this and will be discussed in October Working Group.

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>understanding how long the process would take. There needs to be further investigation and analysis here.</p> <p>We also disagree that this solution will deliver the capability to re-flash devices to the latest version of firmware in the C&S region. That capability already exists – it's BAU for the CSP to upgrade removed/reusable hubs to the latest firmware version before sending them back into the supply chain. There is no barrier therefore to the same process being applied to unused hubs.</p>	<p>CSP C&S is able to reflash the Communications Hubs currently, but not at the volume required to deliver a service to cater for the current backlog.</p>
OVO Energy	Large Supplier	No	<p>As discussed in the Working Group, we do not believe that the business case stacks up with this modification. There is every possibility that the issue will resolve on its own, especially as the lead time for this mod is 12 months. Not all CHs are able to be reflashed successfully or can go wrong, as there's been limited success with this in test. The issue seen in test is that the GPF certs become misaligned and they seemingly can't always be realigned. It's unsure if this is a common issue, but we have seen it.</p>	<p>DCC to provide a response to this and will be discussed in October Working Group.</p>
E.ON UK	Large Supplier	No	<p>On the basis of information provided we do not believe that the identified issue specified (Service Users Return CH to the CSPs for reflash) is one that requires resolving. This is due to a lack of evidence of demand from any specific service users, and that the industry wide stocks of</p>	

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>older firmware are due to be installed prior to the estimated delivery of the capability.</p> <p>The modification proposal documents mention, but are unclear, if they are partly addressing a related but distinctly separate issue – which is the ability for CSPs to reflash where CH have faults or interoperability issues that Service Users are unprepared to accept or install. Please see further our responses in question 11.</p>	SECAS response detailed under question 11.

Question 2: Do you agree that the legal text will deliver MP155?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	No legal text changes were included in the Modification Proposal	This question should not have been included, the legal text would be provided as part of the Full Impact Assessment
OVO Energy	Large Supplier	N/A	The legal changes are usually redlined against the relevant SEC Section and documented alongside the modification report or within it as an Annex, however, this is missing from the associated documentation.	See above
E.ON UK	Large Supplier	No	N/A	See above

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

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	The extended delivery timescales for this change may mean that the volume of CHF on older (N-4) firmware in the field has materially changed, significantly reducing the requirement for this modification proposal.	-
OVO Energy	Large Supplier	No	The earliest that this modification can be delivered is November 2024. With this not looking to be implemented until Nov 2024, we cannot be sure what the situation is going to be like then for CH's. It has been suggested that the backlog is likely to resolve itself over time and this being implemented at that point in time could mean that the cost benefit is non-existent.	-
E.ON UK	Large Supplier	No	The implementation approach is high cost, slow speed to implement and is addressing an issue that does not require resolution.	-

Question 4: Will there be any impact on your organisation to implement MP155?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	British Gas will be required to implement internal processes for identifying the hubs to be returned & to support the DCC defined processes delivered by this modification. Depending on current processing, there may system changes required to process ASN files for assets that have already been received & processed i.e., to update the firmware version in our internal systems. The costs and delivery timescales for these changes is unknown at this stage	-
OVO Energy	Large Supplier	Yes	The costs are incredibly high for this modification, not to mention the explicit charges per CH, if approved.	-
E.ON UK	Large Supplier	No	We have no requirement for a non-faulty / fit for purpose CH to be returned and reflashed, so there is nothing to implement.	-

Question 5: Will your organisation incur any costs in implementing MP155?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	The scale of costs has not been assessed internally at this stage	-
OVO Energy	Large Supplier	Yes	See question 4.	-
E.ON UK	Large Supplier	No costs	We would not implement any internal change, hence there is no cost.	-

Question 6: How long from the point of approval would your organisation need to implement MP155?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	N/A	The time required for implementation has not been assessed internally at this stage.	-
OVO Energy	Large Supplier	-	-	-
E.ON UK	Large Supplier	N/A	We would not implement any internal changes.	-

Question 7: Do you believe that MP155 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	<p>We fundamentally disagree with the proposers view that delivering this change will avoid lengthy install times that would be caused by firmware upgrades being initiated during I&C. Comms hubs are NOT upgraded during I&C, so this is not a valid statement.</p> <p>We agree that there will be a positive environmental impact IF it actually reduces scrappage'. However, if Suppliers returned unused assets that fall outside of the validity period, there would be nothing to prevent the CSPs re-flashing and re-deploying the assets at that point. Therefore, the reduced scrappage benefit is debatable.</p>	DCC to provide a response to this and will be discussed in October Working Group.
OVO Energy	Large Supplier	Yes	-	-
E.ON UK	Large Supplier	No	See responses to other questions.	-

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP155 is implemented?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	We don't see any impact or benefit to consumers of MP155 being implemented for the reasons above.	-
OVO Energy	Large Supplier	Yes, impacts on	As mentioned in a previous answer, the costs of this modification are high for an issue that may resolve itself. These costs will essentially be borne by our customers at a time where they are really feeling the pinch due to the current energy crisis.	-
E.ON UK	Large Supplier	Yes	Detrimental impact to consumers. This would increase costs to consumers, as the implementation costs would need to be recovered from customers bills for a solution that will not be used.	-

Question 9: The fixed charge for this service will be dependent on the volume of Communications Hubs to be re-flashed. To assist with accurately estimating demand for the service it is crucial for SEC Parties to indicate whether they would utilise the service at a variety of cost points. Please indicate the maximum price point that your organisation would utilise this service on a per Communications Hub basis:

- a) £12
- b) £18
- c) £25
- d) £30
- e) Other

Question 9			
Respondent	Category	Response	SECAS Response
British Gas	Large Supplier	We have not yet been able to assess this. We are also confused as to whether, as a Supplier, we would be required to pay this unit cost in addition to our share of the SEC/DCC project cost.	The costs would be shared amongst the Users who choose to take the service. This estimate of users willing to take the service would form the basis of the calculation of the fixed charge. However, if demand for the service was lower than the estimate leading to a lower cost recovery then the shortfall would be paid for by Suppliers through the DCC cost recovery mechanism.

Question 9			
Respondent	Category	Response	SECAS Response
OVO Energy	Large Supplier	With Dual Band CHs being more expensive, then another £12 per CH on top of this for this solution it is unlikely that we will want to utilise this service for any of these cost points.	-
E.ON UK	Large Supplier	N/A – this question can only be answered by Service Users who envisage using this service (are there any?)	-

Question 10: Noting the costs and benefits of this modification, do you believe MP155 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier		We have not yet been able to assess this. We are also confused as to whether, as a Supplier, we would be required to pay this unit cost in addition to our share of the SEC/DCC project cost.	See response to question 9.
OVO Energy	Large Supplier	No	With Dual Band CHs being more expensive, then another £12 per CH on top of this for this solution, it is not cost effective and is unlikely to gain support. Not all CH's can be reflashed successfully and this is an incredibly costly modification considering that the issue may resolve itself.	-
E.ON UK	Large Supplier	No	<p>We do not believe that the identified issue specified (Service Users Return CH to the CSPs for reflash) is one that requires resolving. This is due to a lack of evidence of demand from any specific service users, and that the industry wide stocks of older firmware are due to be installed prior to the estimated delivery of the capability.</p> <p>The modification proposal documents mention, but are unclear, if they are partly addressing a related but distinctly separate issue – which is the ability for CSPs to reflash where CH have faults or interoperability issues</p>	SECAS response detailed under question 11.

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
			that Service Users are unprepared to accept or install. Please see further our responses in question 11.	

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Response and rationale	SECAS Response
British Gas	Large Supplier	<ol style="list-style-type: none"> 1. The issue description states that the current arrangements do not allow for the CSP to re-flash the communications hubs to the latest version of firmware. This is not the case, hubs that are re-flashed currently by the CSPs are upgraded to the latest version of firmware. This applies to CHF's in the Northern region AND CHF's in Central & South. 2. What effort has been made to liaise with Suppliers on a bilateral basis to agree stock holding of 'older' firmware versions? The total stockholding that DCC believes is on N-4 firmware is stated but that could be disproportionately distributed across Suppliers. There is a risk that if this service is not taken up at volume, a Supplier with very little stock on old firmware is disproportionately impacted by the cost recovery mechanism 3. What consideration has been given to the OTA upgrade costs that CSP will avoid upgrading devices that are installed on older firmware versions? The Supplier may effectively pay twice i.e. paying for MP155 and also a previously calculated ongoing support cost to upgrade those hubs on the wall 4. Installing hubs on N-1 or later firmware, then that firmware being upgraded by the CSP is BAU activity. In some cases, more than one 'hop' may be required to reach the current version, but that obligation rests with the CSP. There are 	<ol style="list-style-type: none"> 1. SECAS notes there is a process for reflashing but there is the mechanism to reflash and return those same Communications Hubs to the same Service User. 2. DCC to provide a response to this and will be discussed in October Working Group. 3. DCC to provide a response to this and will be discussed in October Working Group. 4. DCC to provide a response to this and will be discussed in October Working Group.

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Question 11			
Respondent	Category	Response and rationale	SECAS Response
		<p>significant benefits for the CSP if Suppliers pay for and make use of a re-flash service as it removes the complexity of deploying upgrades in the field, but the entire cost is being borne by Suppliers</p> <p>5. How and when are charges going to be calculated? Logically, it can only be done in arrears unless the forecasts are used to determine the unit cost of upgrading the devices for any given supplier. If so, how/will this charge be adjusted (up or down) where the forecasts are not met?</p> <p>6. How will the explicit charges be affected in Year 2, if all set up/development costs are recovered in Year 1? Will the processing charge per device reduce accordingly?</p> <p>MP155-A-012 states an assumption that no SLAs are being defined for this service, but later in the document it refers to SLAs being agreed as part of refinement. Can confirmation be given that SLAs for the return of re-flashed hubs WILL be a deliverable of this modification if it proceeds?</p>	<p>5. To provide as accurate a fixed charge as possible, the DCC would estimate these charges as close to the implementation as possible.</p> <p>6. This would be dependent on demand as if there is high demand expected then the additional storage and processing capabilities would still be required.</p> <p>We can seek the Working Group view as to whether an SLA is an essential deliverable. SECAS agrees that an SLA would be required but the detail is not able to be calculated until the prospective volumes are better understood.</p>

Question 11			
Respondent	Category	Response and rationale	SECAS Response
OVO Energy	Large Supplier	-	-
E.ON UK	Large Supplier	<p>The modification proposal documents mention, but are unclear, if they are partly addressing a related but distinctly separate issue – which is the ability for CSPs to reflash where CH have faults or interoperability issues that Service Users are unprepared to accept or install.</p> <p>We believe the correct issue to be addressed is CSPs / DCC having the ability to reflash CH in the following scenarios:</p> <ul style="list-style-type: none"> o Where CH are in the CSP supply chains with defects or issues that Suppliers / Service Users are unprepared to accept delivery o Where Suppliers / Service Users have taken delivery of CH that have subsequently been found to have defects / issues and Suppliers are unprepared to install. <p>These are key current and future requirements, especially for the transition to 4G CH and the need for backward compatibility and effective Trust Centre Swop Out performance. Furthermore, the current BEIS SSES consultation envisages scenarios where CH may need the ability to interact with a wider range of DSR and IoT devices, and the ability in this evolving environment to reflash CH, will mitigate the redundancy risk of large volumes of CH in an increasing long lead supply chain.</p> <p>We request that the DCC outlines the current and future capabilities in this regard with 2G/3G and RF Hubs, and future capability for 4G Hubs.</p>	<p>This modification is aimed at providing a service to allow these returns and reflash service. It is not aimed at any particular scenario where a Supplier may choose not to install a particular Communications Hub but can encompass any reason.</p> <p>SECAS notes in the scenarios listed there could be an expectation from the Supplier that they would not be charged for the service to reflash. This would between DCC/CSPs and Service Users to agree to waive charges if they choose to.</p> <p>DCC to provide a response to this and will be discussed in October Working Group.</p>