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# MP203 ‘Security Assurance of Device Triage Facilities’ Refinement Consultation responses

## About this document

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This document contains the non-confidential collated responses received to the MP203 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
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	It provides the clarity required to allow non-supplier facilities to prepare and be approved to triage and reset SMETS2 meters	-
CL Refurbishments Ltd	Other	Yes	Yes we feel this would help triage solutions and streamline a solution for providers.	-
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, Vantage Meters believes MP203 effectively resolves the identified issue as it proposes an adequate solution by introducing requirements for Triage Facilities to be a compliant party in this process under the SEC.	-
Calvin Asset Management Ltd	Other SEC Party	Yes	The SEC needs to be amended to allow for all relevant parties to be able to undertake the triage of meters.	-
Secure Meters	Other SEC Party	Yes	-	-
OVO Energy	Large Supplier	Yes	It appears to provide the required assurance relating to data security, by requiring triage partners to pass a FUSA and be designated as 'users'	-

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	Outlining the specific requirements for device triage in the SEC will allow for triage providers to refurbish SMETS2 meters. This will reduce the waste of the smart meter implementation programme, and also lower costs to consumers, by enabling assets to be redeployed post triage. It is worth mentioning that the overall cost of complying with the proposed legal text may make any triage activities commercially unviable. This is a significant concern to NPML as the fundamental purpose of triage use cases is to reduce costs of the smart metering programme.	-
<b>British Gas</b>	Large Supplier	Yes	This seems sensible, and we agree that it is appropriate for any facility undertaking meter triage activities to be subject to security checks and processes.	-
<b>E.ON</b>	Large Supplier	Yes	Enabling Use Cases 001 – 004 (004 in particular) will limit the amount assets to be scrapped to just those that are physically damaged and unsuitable/safe for recirculation.	-

## Question 2: Do you agree that the legal text will deliver MP203?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	-	This is better answered by meter manufacturers	-
CL Refurbishments Ltd	Other	Yes	Yes, but we feel this would be down to manufacturers to approve this.	-
Vantage Meters Investments Limited	Other SEC Party	Yes	I believe further clarity is required in Section G12.8, outlining the frequency and/or a specified time between the first, second and subsequent User Assessments. Only the category of the future assessments is mentioned as to be determined by the SSC. Outside of this, we believe the legal text covers the solutions sufficiently.	Whilst the legal text does reference compliance with section G8, which specifies the frequency of audits, SECAS agrees that it would be clearer if this detail could be included within section G12.8 specifically. This will be updated.
Calvin Asset Management Ltd	Other SEC Party	Yes	The amendments to the Legal Text provide sufficient information and assist in providing guidance around establishing a triage facility. However, we would query the Legal Text reference G12.16 states compliance with G8.22 to G8.30 but should this refer to the whole of section G8 to ensure appropriate process is followed	<p>The new clause, G12.4(i) states Parties must comply with the requirements of Sections G1, G3 to G5, G7 and G8. It also notes under G12.5 that the SSC will provide additional guidance on specifically how the Triage Facility Provider needs to comply with those requirements.</p> <p>Under G12.6 the clauses G8.22 – G8.30 are referenced as that section contains the</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
				<p>details of the process for the User Assessments only.</p> <p>SECAS will review this with the Proposer and the SEC Lawyers to clarify the clauses that need to be listed under G12.6.</p>
<b>Secure Meters</b>	Other SEC Party	Yes	-	
<b>OVO Energy</b>	Large Supplier	Yes	We have no comment regarding the legal validity of the text - however clarity is required regarding the status of triage partners whilst implementing MP203, in particular, the impact of a delayed FUSA audit through no fault of the supplier or triage provider.	<p>This should not impact any existing triage arrangements.</p> <p>This process will mirror other User Assessments i.e. the Triage Facility won't be able to undertake triage until 'approved' or 'approved subject to steps...' The SSC will not allow triage to be started if there are significant security risks.</p> <p>If a Triage Facility is also subject to an existing User Security Assessment then wherever possible these would be aligned. SSC confirmed this is more economical and efficient than separate assessments.</p>
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	The legal text suggested achieves clarifies what is necessary for an organisation to be able to provide triage activities.	-

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	-	-	-
E.ON	Large Supplier	Yes	<p>This will deliver the requirements, however, it should also be noted that;</p> <p>‘unless a separate agreement has been reached with the Triage Facility and any of it’s customers, for the purpose of this text, the Triage Facility will not be responsible for making a determination on whether assets are physically suitable or safe for re-installation, except those that are unable to be triaged due to damages halting the triage process.’</p>	SECAS agrees that determining the suitability of a meter for installation is not covered under this modification.

### Question 3: What legitimate scenarios during installation, maintenance or removal of a Device would cause the tamper-protection boundary to be breached?

Question 3			
Respondent	Category	Response and rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	This is better answered by a MEM or a meter manufacturer	-
CL Refurbishments Ltd	Other	Unknown from our side, as we do not carry out installation.	-
Vantage Meters Investments Limited	Other SEC Party	There is no legitimate scenario where the tamper-protection boundary should be breached during installation, maintenance, or removal of a Device	-
Calvin Asset Management Ltd	Other SEC Party	During installation, maintenance or removal of the meter, the tamper seal may have to be broken to allow for appropriate action to be taken on the meter - dependent on the meter manufacturer and how the meter is designed. For example exchanging a battery on a gas meter would breach the tamper protection boundary and generate an alert but would not render the meter in-operable or unsuitable for future triage.	-
Secure Meters	Other SEC Party	Tamper seals on Communication hubs, terminal covers or battery covers may need to be removed	-
OVO Energy	Large Supplier	Further clarification is required as to whether the battery compartment seal constitutes part of the tamper-protection barrier. There are 2 likely scenarios where this may be breached by us:	-

Question 3			
Respondent	Category	Response and rationale	SECAS Response
		<ol style="list-style-type: none"> <li>1. Replacement of a defective battery in situ by our engineers</li> <li>2. In some variants to allow an engineer to choose a pre-selected switching time (SSC) from a list within the engineering menu.</li> </ol> <p>As part of the interrogation of the engineering menu by our triage partner.</p>	
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	<p>The replacement of the battery in some meters would lead to the tamper protection boundary being breached. Other than this there should be no reason to disturb tamper boundaries without manufacturers providing instruction to do so.</p> <p>In SMETS1 it was possible to reseal the SIM card in some comms hubs to remedy a meter losing WAN connection, but as SMETS2 devices are separate to comms hubs, this should not pose an issue.</p>	-
<b>British Gas</b>	Large Supplier	<p>Legitimate scenarios which could cause the tamper-protection boundary to be breached would include:</p> <ul style="list-style-type: none"> <li>• Removing cover on gas meter</li> <li>• Removing terminal cover on electricity meter</li> <li>• Opening / closing battery doors</li> <li>• Manually removing devices from the HAN.</li> </ul>	-
<b>E.ON</b>	Large Supplier	<p>Electricity meters would be expected to not have the security seal on the terminal cover in place. If an electricity meter has a meter cover seal missing, this should be excluded.</p>	-

Question 3			
Respondent	Category	Response and rationale	SECAS Response
		<p>It can be assumed that gas meters that are returned without battery door seals should be accepted for triage. Certain meter manufactures hide the Engineering Menu, and it only become available once you access the security perimeter (by removing the battery door, thus removing it's seals). Access to this menu could be needed to support Install (Install status and any minor resetting), Maintenance (battery replacement and any information accessible only via the engineering menu) and Uninstall (any minor resetting).</p> <p>It should be down to the Triage Facility as to whether they accept meters without Gas Meter battery doors or Electricity Meter terminal covers for Triage.</p>	

## Question 4: Do you agree with the proposed implementation approach?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	Logical option and swift	-
CL Refurbishments Ltd	Other	Yes	We will feel this approach should help the metering sector, for the safe handling of Triage.	-
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, we see it as imperative that MP203 is implemented during the November 2022 SEC release	-
Calvin Asset Management Ltd	Other SEC Party	Yes	We are supportive of the implementation approach and timescales and want this to be included in the November SEC Release to allow for triage facilities to be established as soon as possible.	-
Secure Meters	Other SEC Party	Yes	-	-
OVO Energy	Large Supplier	No	We have concerns regarding the impact on current S2 triage activities. We currently utilise a partner triage facility to identify candidates for warranty claims and potentially uninstalled meters for return to stock. It is unclear whether existing triage processes would have to go on hiatus whilst MP203 and required audit are implemented. A delay would reduce the likelihood of successful warranty	MP203 is aimed at Triage Facilities who wish to undertake triage in line with Use Case 004. It should not impact on other existing triage processes.

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			claims. We suggest a suitable transition period to allow the continued use of non uc4 compliant asset triage processes.  Further clarification is also required regarding the timescale for the FUSA to be conducted, once we deem that our triage partner is ready for audit / to begin operations under section G requirements.	Timescales for the FUSAs will be guided by the Assessors once the modification is implemented.
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	-	-
<b>British Gas</b>	Large Supplier	Yes	We agree with the proposed implementation approach. However, we would like to see more detail on what exactly would be required for the approval process (both initially, and periodic audits), in order to understand the likely complexation of these requirements for any triage sub-contractor.	The Triage Security Controls Framework (TSCF) has been produced and shared with the SSC and SCIRS. This will be a supporting section to be included within the 'SSC Guidance on Device Security Assurance and Triage' document. This will detail the exact clauses that will apply and provide examples of how Triage Facility Providers should comply.
<b>E.ON</b>	Large Supplier	Yes	The earlier this is introduced and implemented, the quicker these facilities and services will become available. This will benefit all.	-

## Question 5: Will there be any impact on your organisation to implement MP203?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	We will need to work with our triage agent and will see cost for assurance passed down either as a one-off or through unit rates.  Ultimately we will be able to triage and reset meters to be re-installed thereby reducing waste.	-
CL Refurbishments Ltd	Other	Yes	Yes, This would be a major requirements for our business model to continue in our triage sector of metering assets.	-
Vantage Meters Investments Limited	Other SEC Party	No	There will not be any direct impact as Vantage Meters uses 3 <sup>rd</sup> party triage partners for this work.	-
Calvin Asset Management Ltd	Other SEC Party	Yes	As a MAP we want energy suppliers to be able to maximise the asset life of the meters and use devices which are not faulty but have been removed. The changes to the SEC and development of triage facilities will help progress this. We are also investigating the opportunities around establishing a triage facility at one of our metering agent locations (within our Group of companies) in order to undertake triage on the meters removed and returned.	-
Secure Meters	Other SEC Party	Yes	Manufacturers will need to develop and maintain triage tools, interfaces, and systems for a TFP to use	-

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	Whilst the mid - long term impacts appear minimal, in the short-term further clarity is required regarding the timelines prior to implementation and the impact on existing triage processes whilst MP203 is implemented. Furthermore, we are concerned that a cessation of current activities may put undue commercial pressure on triage partners through reduced cashflow and lead to reduced competition within the industry.	SECAS does not believe this modification should impact current existing triage processes.
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	This will allow NPML to make an informed decision on whether the triage of NPML owned assets is commercially viable. This would allow for a positive impact following the implementation of this modification that would reduce meter asset waste.	-
<b>British Gas</b>	Large Supplier	N/A	It would depend on whether we deliver in-house or through an agreement with a third party sub-contractor (once they were authorised).	-
<b>E.ON</b>	Large Supplier	Yes	Positively in that we will have the ability to process assets that fall in scope of being suitable for triage.	-

## Question 6: Will your organisation incur any costs in implementing MP203?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	We expect exceptional costs relating to our agent achieving and maintaining certification – our share of the amount not expected to exceed £10,000 (per documentation provided)	-
CL Refurbishments Ltd	Other	Less than £100k	Yes, we would estimate a spend for implementation of this, but feel this would help us in our Triage, so this is something we would look to do.	-
Vantage Meters Investments Limited	Other SEC Party	Indirect costs	Vantage Meters uses 3 <sup>rd</sup> party triage partners for this work so there will be no cost directly incurred. Ultimately, the assessment and associated SEC party costs will be passed through to MAPs as the cost of triage, so will be felt indirectly.	-
Calvin Asset Management Ltd	Other SEC Party	-	We anticipate there will be costs associated with this change, but we cannot provide indicative amounts at this stage as they will be dependent on decisions to be made by meter manufacturers, suppliers and ourselves in the implementation of any triage facility and interface. There are also considerations to be made around how much a triage facility will cost to establish, be assessed and maintain – based on the requirements in the awaited User CIO Triage Facility Framework guidance. For suppliers the cost of stranding assets is significant; though there	-

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			are costs to set up and run a triage facility, it is hoped the benefits associated, far outweigh these. In addition socialised costs for customers relating to scrapping meters and the environmental impacts will also outweigh the set up costs.	
<b>Secure Meters</b>	Other SEC Party	-	Cost savings will be made by MAPs who will not need to scrap devices	-
<b>OVO Energy</b>	Large Supplier	Unknown	<p>We note the estimate of the initial accreditation at ca. £10k. However, we are unable to forecast additional cost as a result of this change due to the following factors...</p> <ul style="list-style-type: none"> <li>• Lack of clarity from meter manufacturers regarding how use case 4 triage will be facilitated</li> <li>• Impact of any cessation of existing S2 triage operations - clarity is required on the interim period where existing triage providers are awaiting audit / accreditation.</li> <li>• This change may lead to an overall reduction of the number of accredited triage partners within the industry and drive increased costs through reduced competition.</li> </ul> <p>The primary benefit from the implementation of MP203 as a requirement for use case 4 is in the ability to return more meters to stock, reducing the requirement for additional stock to be purchased. We cannot calculate a figure for</p>	<p>Meter manufacturers will have clarity on implementation through this modification and what they are required to provide, although SECAS notes this is up to each Manufacturer on how they specifically implement these requirements.</p> <p>This is not expected to impact current triage processes.</p>

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
			overall benefit until clarity around success of manufacturers uc4 triage processes are understood.	
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	No costs	As this modification specifies what a triage facility needs to be able to carry out triage, and does not mandate triage, the cost of implementation of this modification is £0. It is too soon to tell whether there will be cost savings as this will require demand for second hand SMETS2 meters to be large enough to justify the costs of a triage provider going through the SEC Accession and security assessments.	-
<b>British Gas</b>	Large Supplier	N/A	This is complex to answer. There will be costs for the triage providers who undergo authorisation to provide this service, but we don't know enough on the details to estimate this. (See our answer to Question 4 above.)	-
<b>E.ON</b>	Large Supplier	Confidential Response	Confidential Rationale	-

## Question 7: How long from the point of approval would your organisation need to implement MP203?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
<b>Smart Meter Assets 1 Ltd</b>	Other SEC Party	3-6 months	Depends on availability of assessors	SECAS has clarified with Smart Meter Assets Ltd that they support an immediate implementation (i.e Nov 22 Release) so that assessments can be made as soon as their sub-contractor is ready.
<b>CL Refurbishments Ltd</b>	Other	We estimate 2 months to get everything that's required	We do have most of the requirements in place at present, so it would only be a few alternations to meet the MP203 requirements.	-
<b>Vantage Meters Investments Limited</b>	Other SEC Party	No time required for Vantage as a MAP	Given most triage facilities sit very separately to the workings of the SEC, almost all facilities will need assistance in acceding to the code and understanding how to now operate compliantly under it. This will take time and assistance from MAPs and Manufacturers.	-
<b>Calvin Asset Management Ltd</b>	Other SEC Party	Timescales to be confirmed	As per Question 6, we need to undertake further work to determine associated costs and timescales to discuss with our Board and meter manufacturers we work with, as	-

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
			to whether we progress with establishing a triage facility and seeking assessment on this.	
Secure Meters	Other SEC Party	Confidential Response	Confidential Rationale	-
OVO Energy	Large Supplier	2-3 months	We estimate 2 - 3 months. Whilst further clarity is required to conduct readiness planning we are confident that our existing triage partner could incorporate the required changes in a short time scale, given their current capability, capacity and existing security accreditation. However, we believe SEC should issue more detailed guidance (i.e. a check list) to facilitate triage partners who have not previously been designated as 'users'	The Triage Security Controls Framework (TSCF) has been produced and shared with the SSC and SCIRS. This will be a supporting section to be included within the 'SSC Guidance on Device Security Assurance and Triage' document. This will detail the exact clauses that will apply and provide examples of how Triage Facility Providers should comply.
Northern Powergrid Metering Ltd	Other SEC Party	N/A	-	-
British Gas	Large Supplier	N/A	N/A. This change enables parties to undertake User Case 4 triage, and so parties would be able to proceed with processing their backlog of assets as soon as the provider(s) were authorised. So it could be implemented a.s.a.p.	-
E.ON	Large Supplier	Confidential Response	Confidential Rationale	-

## Question 8: Do you believe that MP203 would better facilitate the General SEC Objectives?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	First objective – this facilitates the efficient operation of Smart Metering Systems  Sixth objective – the controls within this modification help ensure the protection of Data	-
CL Refurbishments Ltd	Other	Yes	One streamline platform will help with the throughput of triages assets, so increase the turnaround for MAPS and MOPS. So we feel this would be a huge advantage to SMET2	-
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, we believe that MP203 would better facilitate objectives in Section C1.1a and C1.1f specifically. MP203 encourages the protection of Data and Data Systems by providing Triage partners with a binding SEC framework for the security of their interactions with smart meters. MP203 also enhances the efficient provision and installation of smart meter systems by enabling a more circular supply chain whereby removed meters are reinstalled, reducing waste and the use of new materials.	-
Calvin Asset Management Ltd	Other SEC Party	Yes	Being able to re-issue devices which are not faulty, assists with achieving Objective A - facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain – as this will help to maximise existing	-

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Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			assets and assist with efficiency and reduce spending on new meters which are not needed. Introducing the measures through the SEC also ensures a consistent and formal approach is followed to obtaining an approved security assessment and guards against potential security concerns, in line with achieving Objective F.	
<b>Secure Meters</b>	Other SEC Party	Yes	-	-
<b>OVO Energy</b>	Large Supplier	Yes	Yes - primarily we believe that this strengthens Objective (f) relating to data security; but also, as an enabler to use case 4 which in itself meets SEC objectives relating to both sustainability and innovation.	-
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	This modification allows better facilitation of objectives A and F.	-
<b>British Gas</b>	Large Supplier	Yes	We agree with the draft Modification Report that it would better facilitate General SEC Objectives (a) and (f).	-
<b>E.ON</b>	Large Supplier	Yes	We agree with the proposer's assessment of the SEC Objectives.	-

## Question 9: Do you believe there will be any impacts on or benefits to consumers if MP203 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	Reduced scrapping of non-faulty meters will reduce overall costs which ultimately are borne by the consumer	-
CL Refurbishments Ltd	Other	Yes	Triage time scales, should be increased if we have a streamline process, so hopefully this will increase the volumes of assets circulated.	-
Vantage Meters Investments Limited	Other SEC Party	Yes	By giving Triage facilities a framework by which they are allowed to triage SMETS2 meters, it benefits the consumer by providing the smart metering supply chain with faster access to volumes of meters, so there is a lesser dependency on meter manufacturer lead times. This benefit could in some cases leading to reduced consumer wait time for a smart meter exchange if energy suppliers run into supply chain difficulties with their meters of choice.	-
Calvin Asset Management Ltd	Other SEC Party	Yes	The implementation of this change and subsequent introduction of triage facilities, will help to ensure assets are maximised, that non-faulty assets are not stranded and extra costs for ordering new meters is reduced for suppliers. All of these points will benefit consumers through reduced Smart charges from energy suppliers.	-

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Secure Meters	Other SEC Party	Yes	-	-
OVO Energy	Large Supplier	Yes	Will provide assurance to consumers regarding security of their data.  Potentially may lead to lower operating costs for the supplier through reduction in stock purchasing requirements and reduced scrappage.	-
Northern Powergrid Metering Ltd	Other SEC Party	Yes	Indirectly, this modification will reduce consumers bills by allowing the reuse of SMETS2 assets, that are currently single use, and also have environmental benefits by reducing the amount of metering equipment that is scrapped	-
British Gas	Large Supplier	No	N/A	-
E.ON	Large Supplier	Yes	While not directly, the ability to reduce the amount of waste from meter scrappages will benefit consumers in the long run, as there will be a better supply of meters to be available for install (critical in this time of meter supply chain issues) and also the costs of scrappage will be reduced, and that reduction, in theory, should be passed onto consumers.	-

## Question 10: Noting the costs and benefits of this modification, do you believe MP203 should be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	Yes	Positive cost and environmental benefits	-
CL Refurbishments Ltd	Other	Yes	Yes	-
Vantage Meters Investments Limited	Other SEC Party	Yes	Yes, Vantage Meters believes MP203 should be implemented	-
Calvin Asset Management Ltd	Other SEC Party	Yes	We need to reduce the current and growing amount of non-faulty SMETS2 devices which cannot be used and have to be scrapped. This is having an impact on energy suppliers through write off charges, having a significant impact on the environment as meters are being scrapped and therefore an impact on consumers due to additional charges. The implementation of this change will assist in the development of triage functions to help remedy these issues.	-
Secure Meters	Other SEC Party	Yes	-	-

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
<b>OVO Energy</b>	Large Supplier	Yes	With the caveat that further detail should be required as soon as practical regarding the FUSA process and the interim arrangements whilst existing triage partners prepare and wait for FUSA.	This should not impact on existing triage processes. The Triage Security Controls Framework (TSCF) has been produced and shared with the SSC and SCIRS. This will be a supporting section to be included within the 'SSC Guidance on Device Security Assurance and Triage' document. This will detail the exact clauses that will apply and provide examples of how Triage Facility Providers should comply.
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	Yes	-	-
<b>British Gas</b>	Large Supplier	Yes	-	-
<b>E.ON</b>	Large Supplier	Yes	As per Q1, this will benefit all.	-

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

Question 11			
Respondent	Category	Comments	SECAS Response
Smart Meter Assets 1 Ltd	Other SEC Party	-	-
CL Refurbishments Ltd	Other	We feel the MP203 would be huge a benefit to all MAP/MOPS/Manufacturers, and a long waited answer to assets that are currently in storage with no chance of install in there current states.	-
Vantage Meters Investments Limited	Other SEC Party	N/A	-
Calvin Asset Management Ltd	Other SEC Party	<p>Whilst we are supporting of the implementation of this change, thus allowing triage facilities to be established, we are mindful that the Legal Text does not provide any specific details in relation to how the Assessment process will work and there is no reference to any dispute process where that reported to the Provider is not agreed with. It is hoped this information is provided in the User CIO Triage Facility Guidance which is expected soon. Furthermore there are now a number of documents which cover this topic. In order to ensure all interested parties are aware of the requirements and can ensure compliance it would be helpful to have these all in one place. We would also like to highlight the risk of different interpretations of the requirements by the various parties, such as meter manufacturers, as we have seen in the past, so would expect the documentation to be explicit and not open to interpretation.</p>	<p>The legal text references section G8 which covers the User Assessment process in more detail. SECAS will investigate making the new clauses more explicit in this regard.</p> <p>The intention is for the TSCF to be incorporated within the SSC Guidance for Device Security Assurance and Triage to keep the information together.</p>

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Question 11			
Respondent	Category	Comments	SECAS Response
		Our final point considers that whilst triage facilities can now be established and manufacturers are working on firmware solutions and triage tools to provide the functionality for re-setting the meters in the future, this does not provide a solution for the thousands of SMETS2 meters which have already been removed but cannot be re-issued due to current obligations. This has a significant environmental and cost impact to energy suppliers and ultimately consumers and action needs to be taken across the industry to consider what remedial actions can be taken to improve this.	
Secure Meters	Other SEC Party	-	-
OVO Energy	Large Supplier	<p>We broadly support the change as an enabler of use case 4, however, we require clarity regarding the impact on ongoing S2 triage activities whilst this process is implemented.</p> <p>We need to understand the timescales between implementation and audit, and what S2 triage process can continue in this period.</p> <p>We are unclear of the full financial impact due to lack of clarity from meter manufacturers how these requirements will be achieved within their S2 reset processes, and how any costs will be passed on to ourselves.</p> <p>We feel that the environmental benefits of use case 4 are being understated in the supporting documentation.</p> <p>Further clarity is required relating to the tamper boundary.</p>	<p>As noted above, SECAS does not believe this should impact on existing triage arrangements.</p> <p>SECAS has noted there may be differences in Meter Manufacturers implementation, albeit they will need to comply with the stated requirements of this modification.</p> <p>SECAS will reflect this view on environmental benefits within the Modification Report.</p>

Question 11			
Respondent	Category	Comments	SECAS Response
		We believe improved guidance and support is required for triage partners becoming SEC users as a result of this change.	SECAS has noted the responses to the tamper boundary breach reasons and will aim to include further detail within the Triage Security Controls Framework (TSCF) to be included within the 'SSC Guidance on Device Security Assurance and Triage' document. This will detail the exact clauses that will apply and provide examples of how Triage Facility Providers should comply.
<b>Northern Powergrid Metering Ltd</b>	Other SEC Party	-	-
<b>British Gas</b>	Large Supplier	Having a solution for processing assets such as these (which are fully functional, but just need resetting) is really important, especially in the light of recent component shortages (chips etc...)	-
<b>E.ON</b>	Large Supplier	-	-