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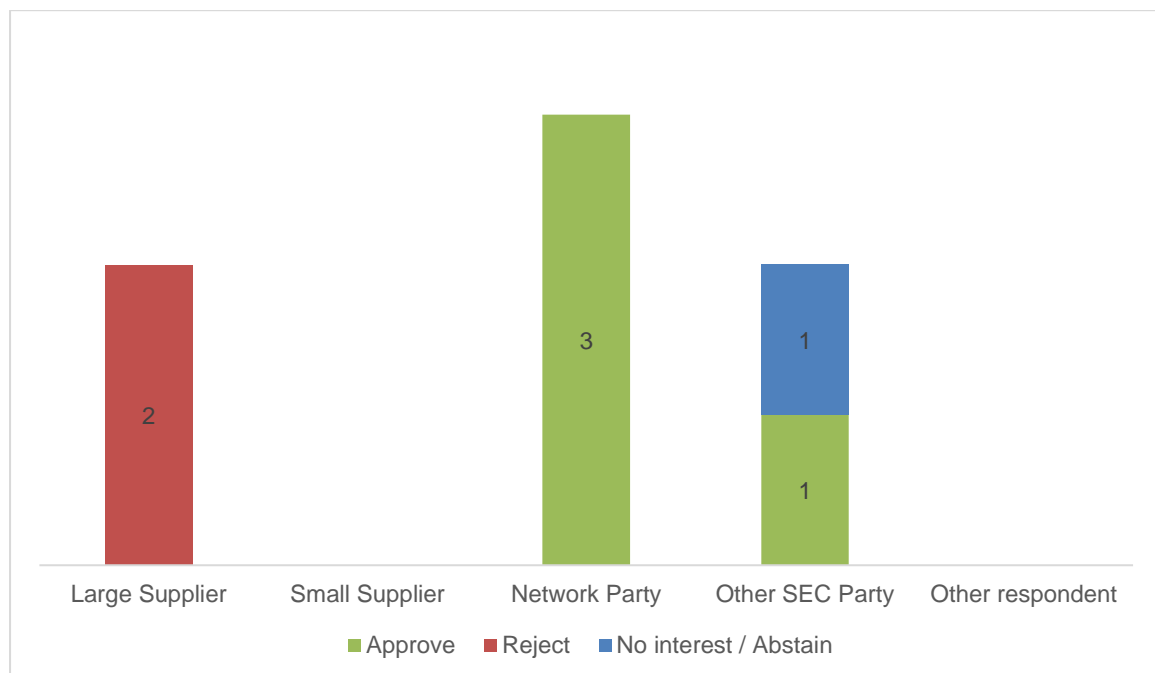
# MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'

## Modification Report Consultation responses

### About this document

This document contains the non-confidential collated responses received to the MP172 Modification Report Consultation.

### Summary of responses



## Question 1: Do you believe that MP172 should be approved or rejected?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Reject	Whilst we agree with the general principle of encouraging innovation, we are still concerned about this modification proposal, and remain concerned about the risks, as outlined in more detail in our earlier response to the Refinement Consultation.	-
EDF	Large Supplier	Reject	We are concerned about this proposal and are not sure why products cannot be tested and validated at scale in the existing test environment for this purpose.	-
Electricity North West Limited	Network Party	Approve	<p>We agree MP172 better facilitates SEC Objectives (a) and (e).</p> <p>The lack of flexibility to support Minimum Viable Product (MVP) testing on the live DCC network is preventing Device Manufacturers from being able to invest confidently to bring innovative products to market.</p> <p>This restriction results in defects which may have been identified during live environment testing not coming to light until after the mass rollout of Devices, at which point they become harder to resolve at greater financial and reputational cost to the industry.</p> <p>The lack of 'real world' testing before large volumes of meters are deployed into the wild has already resulted in</p>	-

Question 1				
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			numerous defects being exhibited in live which can take many months to resolve and contribute to congestion of the CSP network due to continual large firmware upgrades needing to be deployed to large volumes of devices. In worse-case scenarios there are large number of devices deployed which have one or more non-compliances with SMETS/CHTS specifications which cannot be resolved by OTA firmware upgrade and then become left in-situ because it is not economically viable for Suppliers to rip and replace the devices.	
<b>National Grid Electricity Distribution</b>	Network Party	Approve	We feel that this modification proposal will better facilitate SEC objective (a) Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	-
<b>Scottish and Southern Electricity Networks</b>	Network Party	Approve	We agree that this modification improves the efficiency of approving a device onto the CPL which relates to SEC Objective (a).	-
<b>Energy and Utilities Alliance</b>	Other SEC Party	Abstain	N/A	
<b>geo (Green Energy Options)</b>	Other SEC Party	Approve	This proposed solution will make it easier to bring innovation to market, by removing the burden to have full	-

Question 1				
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			<p>CPA assurance before any trials on a live metering network can take place.</p> <p>Additionally, this is likely to capture some bugs that are not seen in test environments prior to mass market roll-out. Thus, reducing more costly bug fixing after a mass market roll-out.</p>	

## Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
British Gas	Large Supplier	<p>As well as our general concerns over this modification, we are unclear who is the current sponsor for this modification. The Modification Report says Eric Taylor from SMETS Design Ltd, but I believe he has now left that company, and is focusing on other activities instead. Is someone else from SMETS Design Ltd now taking Eric's place, or does the modification require a new proposer/sponsor? Can you confirm what is the process if there isn't an active sponsor?</p> <p>We are still concerned about the consumer perspective, for the individual customers selected to receive the 'reduced CPA &amp; CPL' devices.</p> <p>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 just be a matter of adding 'small print' to the T&amp;Cs, but ensuring the homeowner (and occupier), and any future owner / occupier, are fully aware of what they are saying 'yes' to.</p> <p>This becomes yet more complicated if the customer changes Supplier after the 'reduced CPA &amp; CPL' device has been installed. Even if the customer's Supplier has supported the trial, if the customer has changed supplier, it will inevitably be hard to monitor and ensure that the device is definitely 'made good' (ie upgraded to a new firmware, or removed) at the end of the trial, once it moves away from the original Supplier. Whilst the Modification Report states the plan is for Suppliers</p>	<p>The Proposer is still a representative of SMETS Design Limited.</p> <p>Regarding implementation costs, on page 13 of the Modification Report it states: "SECAS advised that it currently receives an extract of the SMI on behalf of the SSC that can then be filtered down to monitor Devices that have a CPA Certificate expired. SECAS noted this same process could be mirrored. The DCC confirmed this would be a suitable approach, and the business requirement were redrafted to reflect this <b>Considering this, the DCC returned confirmation that its solution to provide extracts of the SMI can be carried out at no additional cost.</b> The SSC will then combine these extracts with the CPL to identify Trial Devices."</p>

Question 2			
Respondent	Category	Comments	SECAS Response
		<p>to try to target a group of customers who are unlikely to change Supplier, in the current market conditions that may be difficult.</p> <p>Separately, is it possible to confirm if there are implementation costs (for the 'trial flag') or not, in the final version of the modification report. Under 'Solution Development' – 'DCC System Impacts' at the top of page 13 there is reference to a £85,000 - £115,000 Preliminary impact Assessment cost, primarily for a 'Trial Flag' (a SSC requirement) but lower down that page, under Business Case, it says that no DCC Implementation costs.</p>	
EDF	Large Supplier	<p>We are not comfortable that devices are tested in production environments to avoid CPA processes. We believe that CPA processes should be changed to support the introduction of new devices. We are still not clear of what the exact issue this is intending to resolve.</p>	
Electricity North West Limited	Network Party	<p>We would recommend that:</p> <ul style="list-style-type: none"> <li>• Cohorts of trial meters are limited to an agreed number of devices</li> <li>• That such cohorts are deployed in both CSP-C/S and CSP-N areas to help identify any network related issues or behaviours</li> <li>• That the identity (GUID) of the deployed devices are notified to Network Parties so that we can if desired run a thorough exercise of Service Requests against the devices with the aim of identifying any issues before the devices are accepted into a more widespread rollout (full CPL certification)</li> </ul>	-

Question 2			
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		<ul style="list-style-type: none"> <li>There needs to be an agreed mechanism for parties to raise issues/incidents against the trial cohorts such that they are not rolled out into widespread usage (full CPL certification) if there are any known issues</li> </ul> <p>There should be a mandatory check to ensure any issues/incidents raised have an accepted resolution plan before allowing any cohort to progress to full CPL certification</p>	
National Grid Electricity Distribution	Network Party	We believe there is an issue with the proposed legal text Section F3.31. It states ' <i>If a Trial Device Approval expires, or is withdrawn or cancelled, the Trial Device Certificate will be expire, be withdrawn or be cancelled (as applicable) by the Security Sub-Committee</i> '. We don't believe this makes sense, should it be 'expired'?	SECAS agrees that this is a typo – the text should read “expire” rather than “be expire”. This will be amended and a v1.1 of the MP172 legal text provided with the final report.
Scottish and Southern Electricity Networks	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.	
Energy and Utilities Alliance	Other SEC Party	Confidential response omitted.	-
geo (Green Energy Options)	Other SEC Party	N/A	-