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MP172 ‘Reduced CPA & CPL requirements for innovation and Device field trials’

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board regarding approval or rejection of this modification.

Summary of conclusions

Change Board

The Change Board voted to **approve** MP172. It believed the modification better facilitated SEC Objectives (a)¹ and (e)².

Modification Report Consultation

SECAS received seven responses to the Modification Report Consultation. Four believed that the modification should be approved, two believed the modification should be rejected and one abstained.

All respondents who believed the modification should be approved considered it better facilitated SEC Objective (a), and two respondents also considered it better facilitated SEC Objective (e).

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² Facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.

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Modification Report Consultation responses

Summary of responses

Approve

Two respondents who believed the modification should be approved stated that the modification would give Device Manufacturers the confidence to invest in bringing innovative products to market, by removing the restrictions on real-world Minimum Viable Product (MVP) testing and allowing more issues to be identified before mass rollout.

One respondent added several recommendations for how the Trial Device Certificates should be used in practice. These related to how the Devices should be deployed, sharing the identities of the deployed Devices with Network Parties and how issues should be raised and resolved. These recommendations will be shared with the Security Sub-Committee (SSC) for consideration – several of these recommendations are covered by the guidance which the SSC has drafted to be published alongside the implementation of the modification.

One respondent gave a correction to a typo in the legal text, which has been adopted into the version (v1.1).

Reject

One respondent who believed the modification should be rejected believed that Devices should be testable at the necessary volume in the existing test environments and that, if necessary, changes should be made to the Central Product Authority (CPA) processes to support the introduction of new Devices.

One respondent who believed the modification should be rejected expressed concerns that consumers would need to be made fully aware of the implications of having 'reduced' CPA coverage, and that it would be too complicated to manage consumers who wish to change Suppliers and Changes of Tenancy (CoTs) at premises where Trial Devices are installed.

Change Board vote

Change Board vote

The Change Board voted to **approve** MP172 under Self-Governance.

The vote breakdown is summarised below:

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	2	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumer Representative	1	0	0	Approve
Overall outcome:				APPROVE

Views against the General SEC Objectives

The Change Board believed that MP172 will better facilitate SEC Objectives (a) and (e) by allowing Device Manufacturers to drive innovation and develop products that would benefit consumers and industry.

Change Board discussions

SECAS previously presented the modification at the December 2022 Change Board meeting. Members noted concerns around how trials would be monitored and where the responsibility would sit in specific instances relating to consumer churn. SECAS has subsequently provided a guidance document designed to address these concerns and made a minor change to the legal text (v1.2) to stipulate that a requirement of all trials will be that consumers must provide informed consent prior to having a Trial Device Model installed.

At the ad-hoc Change Board meeting on 1 February 2023, members again noted concern over the possibility of consumer churn and what the gaining Supplier should do in these instances. The SSC Chair advised that the SSC would notify gaining Suppliers through their usual SEC contact to notify them of any churn events and provide instructions on how to proceed. SECAS advised that the trial participants would be responsible for retrieving the Trial Device Model if it had to be removed. SECAS, the SSC Chair and the Department for Business, Energy and Industrial Strategy (BEIS) representative agreed to produce further guidance for Suppliers on how to manage a Change of Supplier (CoS) event involving a Trial Device Model without CPA certification prior to the modification's implementation.

A Change Board member queried whether more reassurances were needed in the legal text to clarify whose responsibility it is to deal with any problems that occur during the trial. A BEIS representative explained that the legal text has been drafted in a way that gives the SSC full autonomy in that decision. They added that if a serious problem does occur during the trial, the SSC can halt the ongoing trials and any future trials.