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MP231 ‘Firmware upgrade pathways’

Annex B

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP231 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
EON UK	Large Supplier	Yes but with reservations / health warning.	<p>While the modification has significant merit, the missing part is the ability to access the manufacturer's latest release notes.</p> <p>These release notes give both the optimal firmware upgrade paths which are updated on every release.</p> <p>This can be in a schematic format which is much easier to understand than the proposed solution.</p> <p>The release notes can also contain guidance, known issues and other useful information e.g. whether the firmware supports block tariffs or not.</p> <p>MP231 would show that you "can" upgrade to a certain version, but the release notes would indicate whether you "should" upgrade to that version i.e. is it beneficial to perform that upgrade based on scenarios and circumstances. A Supplier could perform an authorised "upgrade", without realising the deleterious consequences of that "upgrade".</p>	<p>SECAS agrees that full access to Release Notes would be helpful. However, the SEC does not mandate the information that should be included and therefore varying depths of information can be included.</p> <p>In addition, Device Manufacturers have previously indicated that these are commercial documents and therefore their availability should be at the discretion of the Manufacturer.</p>
OVO Energy	Large Supplier	Yes	We don't experience any issues with the manufacturers we work with, but we believe that it would be useful for the ones that we don't have a contract with.	-

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Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Calvin Asset Management Limited	Other SEC Party	Yes	<p>As a Meter Asset Provider we are keen for suppliers to upgrade and maintain the meters on the most recent firmware and we are supportive of measures to help this process.</p> <p>Providing parties with the necessary information to improve the efficiency and reduce errors in the upgrade process for devices should benefit all parties.</p>	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	<p>Northern Powergrid Metering Limited (NPML) are supportive of this solution and believe that whilst this does not fix the root cause of the issue (suppliers not being diligent in their upgrade process) it provides a single, central source for all meter firmware versions.</p> <p>We also believe this solution supports the “all reasonable endeavours” licence condition to ensure that meters are maintained in an operational state and are not removed prematurely. Preventing unnecessary removals ultimately reduces costs and inconvenience for customers.</p>	-
British Gas	Large Supplier	Yes	<p>In principle, this is a really good idea.</p> <p>We would prefer it to also include a retrospective update, that matched what realistically might still be on customer’s walls or in the warehouse ... ie including N-2 or N-3 retrospectively if possible.</p>	SECAS will endeavour to collect the information on retrospective Devices. However, the legal obligations in the SEC should be forward facing.

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>However, it is still worth doing, even if the data isn't 100% complete retrospectively.</p> <p>Ownership of the firmware upgrade pathway (and responsibility to update it in the FIR) needs to sit with the manufacturers. This is outside the scope of this mod, but included in MP222 (which is out for Report consultation at the same time as this Refinement Consultation).</p>	<p>MP222 'CPL submission efficiency improvements' is due for vote at Change Board on 24 May 2023. If the modification is not approved then this point can be discussed with the Working Group to agree a way forward.</p>

Question 2: Which identifier should be used as a reference to denote previous firmware versions required for the upgrade pathway?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
EON UK	Large Supplier	CPL Entry ID	Using the CPL Entry ID cannot be misinterpreted	-
OVO Energy	Large Supplier	-	We don't feel that this will impact us and therefore have no preference.	-
Calvin Asset Management Limited	Other SEC Party	Firmware version	We suggest firmware version as the most suitable identifier – as stated this is the terminology used in practice. Using the CPL entry ID would likely introduce further look-ups / cross checks into the process which could reduce the intended improvement in accuracy and efficiency. Whichever option is taken forward, should not be overly complex and needs to be consistently applied.	-
Northern Powergrid Metering Limited	Other SEC Party	CPL Entry ID	As multiple entries share the same firmware version name, and this can be across manufacturer in some cases, it is critical that any ambiguity is removed.	-
British Gas	Large Supplier	-	For IHDs that could be SMETS1 or SMETS2 – they would need to be separate line items (but same firmware version). We don't mind CPL Entry ID,	SECAS believes this answer is in relation to PPMIDs rather than IHDs.

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			but can they clearly show Hex for easy reference (or Firmware version) – that is what we are used to seeing from release notes, and it would be simplest if we can keep looking for the same reference.	<p>Those PPMIDs that work in either SMETS1 or SMETS2 currently have two entries on the CPL where the firmware version differs between SMETS1 and SMETS2 Device Models. MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs' will allow for the same firmware version to be used for SMETS1 and SMETS2 PPMID Device Models. Firmware upgrades to PPMID SMETS2 Device Models based on GBCS version 4.1 or higher are possible whereas it is not possible to carry out firmware upgrades of SMETS1 PPMID Device Models using the same firmware version as the corresponding SMETS2 PPMID Device Models. Using the firmware version as the look-up criteria would incorrectly suggest that firmware updates to SMETS1 PPMID Device Models are possible; therefore using the CPL Entry ID as the reference would provide a unique reference avoiding any ambiguity.</p> <p>Since the consultation was issued, SECAS has reviewed the current CPL entries more fully and noted that the same firmware versions are used by multiple manufacturers for Device Models. Therefore, to remove ambiguity the manufacturer code would also be needed as a minimum along</p>

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
				<p>with the firmware version to become part of the Firmware Upgrade Path. It might also be required to add the device model identifier, and possibly the device hardware version and revision, to ensure uniqueness. Note that this will not be sufficient to differentiate between SMETS1 and SMETS2 PPMID Device models using the same firmware version (as explained above).</p> <p>The Firmware Upgrade Path is deemed to be only available to SEC Parties, this is why it is added to the FIR instead of the CPL. For ease of use the FIR and CPL can be combined by means of a standard Excel Xlookup using the CPL Entry Number as a key. This allows the creation of a single list which can be filtered.</p>

Question 3: Do you agree that the provision of ZigBee stack version and ZigBee chipset vendor should be included?

Question 3			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	Yes	This is useful information if a known issue is related to the ZigBee stack version and ZigBee chipset vendor
OVO Energy	Large Supplier	-	We don't use this in Live, so believe it is more of a security point
Calvin Asset Management Limited	Other SEC Party	-	We do not have a view on this but would reiterate the need to keep the information as simple as possible.
Northern Powergrid Metering Limited	Other SEC Party	Yes	This being present in the repository will allow suppliers to better identify issues present in specific stack versions and may allow for better management of issues across manufacturers.
British Gas	Large Supplier	Yes	Yes, we would support this being included. It would be useful to know if there was a stack specific issue.

Question 4: Do you agree that information on a Device's ZigBee banding and how it is used to join the HAN, should be included within this modification?

Question 4			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	Yes	Useful for diagnostics and support
OVO Energy	Large Supplier	Yes	Although we don't use this, it may be of value for devices that don't upgrade to understand why
Calvin Asset Management Limited	Other SEC Party	-	We do not have a view on this but would reiterate the need to keep the information as simple as possible.
Northern Powergrid Metering Limited	Other SEC Party	Yes	The overall aim of this modification is to ensure that meters on the wall remain on the wall, and any information that will aid in joining the HAN should be included if there is an opportunity to provide this without incurring additional costs to industry
British Gas	Large Supplier	Yes	Yes, we would support this being included.

Question 5: Do you agree that both SMETS1 and SMETS2 Communications Hubs should be included within the scope of this modification?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
EON UK	Large Supplier	Yes	SMETS1 Communication Hubs should definitely be included as they are upgraded by Suppliers. SMETS2 Communication Hubs are optional as DCC upgrades them.	-
OVO Energy	Large Supplier	Yes	Yes, because it would be useful to know how many different FW upgrades would be required to get up to the current one.	-
Calvin Asset Management Limited	Other SEC Party	No	We are unclear why comms hubs are being considered as part of this as we understood this change only relates to meters, not comms hubs. Adding references to comms hubs may confuse entries further.	Working Group noted that Suppliers are responsible for SMETS1 Communications Hub firmware update and therefore suggested inclusion. The SSC has also asked that SMETS2 Communications Hubs be included as this information is deemed useful from a risk assessment perspective.
Northern Powergrid Metering Limited	Other SEC Party	Yes	Taking a consistent approach to populating this list makes sense, exclusion of comms hubs may cause confusion where a supplier is responsible for updating SMETS1 hubs.	-

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	Yes	<p>As a Supplier, we definitely want SMETS1 Comms Hubs included, as we are responsible for upgrades.</p> <p>As a Supplier, we are not particularly interested in SMETS2 Comms Hubs, as we don't upgrade them (the CSP does instead). However, if this database information is going to be used by more than just Suppliers, it seems sensible for SMETS2 Comms Hubs to be included.</p>	-

Question 6: Do you agree that the legal text will deliver MP231?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
EON UK	Large Supplier	Yes	Although without release note access, I would not rely exclusively on the information contained in the Firmware Information Repository	-
OVO Energy	Large Supplier	Yes	-	-
Calvin Asset Management Limited	Other SEC Party	Yes	-	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The changes proposed are mandatory, and specific enough to ensure that the information provided will be usable by all SEC parties interested in the CPL.	-
British Gas	Large Supplier	Yes	Text seems correct, except for: F2.14 use of 'CH' abbreviation in (F). This looks like a typo. Nothing in the legal text supports the "Best Endeavours" point at the bottom of page 5 of the MP231 draft Modification Report. The legal text reads as though it is mandatory for all devices on the FIR (new ones going forwards, and old ones).	This definition for a SMETS1 Communications Hub is found in the SEC Definitions as "means a physical device comprising a SMETS1 CHF and a SMETS1 GPF. The best endeavours approach to retrospective population is not seen as a legal obligation. This would be an effort from SECAS to better facilitate the introduction of the process. This

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
				discussion point can be covered off in the Working Group to determine other viewpoints.

Question 7: Do you agree with the proposed implementation approach?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
EON UK	Large Supplier	Yes	N/A	-
OVO Energy	Large Supplier	Yes	-	-
Calvin Asset Management Limited	Other SEC Party	Yes	-	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	This change does not impact additional documentation outside of the CPL and FIR. As the implementation approach is aiming to make new entries mandatory, additional delays only create more blank entries on releases that occur between modification approval and implementation.	-
British Gas	Large Supplier	Yes	We would prefer the implementation to be retrospective as well (ie for older devices).	See response to Q6.

Question 8: Will there be any impact on your organisation to implement MP231?

Question 8			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	No	This assumes MP222 is completed. Otherwise, the Supplier would need to obtain the information for the submission process.
OVO Energy	Large Supplier	No	No, as upgrade paths already exist in Manufacturers Release Notes and we have access to the CPL
Calvin Asset Management Limited	Other SEC Party	Yes	We provide a firmware repository for our customers and this information will be useful for us to provide to our customers to give them the accurate upgrade path for firmware.
Northern Powergrid Metering Limited	Other SEC Party	No	-
British Gas	Large Supplier	No	Useful thing to have. No mandatory change for us.

Question 9: Will your organisation incur any costs in implementing MP231?

Question 9			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	No costs	N/A
OVO Energy	Large Supplier	Less than £100k	Modification costs
Calvin Asset Management Limited	Other SEC Party	No costs	-
Northern Powergrid Metering Limited	Other SEC Party	No costs	-
British Gas	Large Supplier	No costs	-

Question 10: How long from the point of approval would your organisation need to implement MP231?

Question 10			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	N/A	There would only be impact as and when a new CPL entry was being submitted.
OVO Energy	Large Supplier	Immediately	-
Calvin Asset Management Limited	Other SEC Party	N/A	-
Northern Powergrid Metering Limited	Other SEC Party	N/A	-
British Gas	Large Supplier	-	No implementation time required, as there is not mandatory change for us. However, it will be a useful resource to have access to as soon as it is available.

Question 11: Do you believe that MP231 would better facilitate the General SEC Objectives?

Question 11			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	Yes	Potentially, it may provide a more robust customer experience
OVO Energy	Large Supplier	Yes	-
Calvin Asset Management Limited	Other SEC Party	Yes	We consider this supports the facilitation of SEC Objectives A and C
Northern Powergrid Metering Limited	Other SEC Party	Yes	Firmware upgrades ensure that devices continue to work as intended and this modification will better facilitate SEC objective (a).
British Gas	Large Supplier	Yes	Agree that it would better facilitate General SEC Objective A.

Question 12: Do you believe there will be any impacts on or benefits to consumers if MP231 is implemented?

Question 12			
Respondent	Category	Response	Rationale
EON UK	Large Supplier	Yes	Potentially, it may provide a more robust customer experience
OVO Energy	Large Supplier	Yes	One benefit will be having extra information on the upgrade paths to help make things even clearer
Calvin Asset Management Limited	Other SEC Party	Yes	Positive benefit as this will help suppliers ensure they are taking the appropriate action to maintain installed meters with appropriate firmware which helps to maximise security of the meter and ensure it functions effectively.
Northern Powergrid Metering Limited	Other SEC Party	Yes	This will see fewer meters being damaged by incorrectly applied firmware. Depending on the issues resolved on the specific firmware versions, this will lead to mitigating any unintended consequences of not applying firmware correctly.
British Gas	Large Supplier	Yes	Helps ensure more devices are working.

Question 13: Noting the costs and benefits of this modification, do you believe MP231 should be approved?

Question 13				
Respondent	Category	Response	Rationale	SECAS Response
EON UK	Large Supplier	Yes	Noting that this does not solve the core issue of easy access to Manufacturer Release Notes (and firmware images)	See response to Q1.
OVO Energy	Large Supplier	Yes	As this is a relatively low cost when spread across all Suppliers, we don't have an issue with this being approved, as it's more of a nice to have.	-
Calvin Asset Management Limited	Other SEC Party	Yes	As per responses to questions 1 and 2	-
Northern Powergrid Metering Limited	Other SEC Party	Yes	The cost to implement this modification will likely be recovered via prevention of meter removal caused by incorrectly applying firmware upgrades.	-
British Gas	Large Supplier	Yes	Seems sensible, and cost is reasonable.	-

Question 14: Please provide any further comments you may have.

Question 14			
Respondent	Category	Comments	SECAS Response
EON UK	Large Supplier	N/A	-
OVO Energy	Large Supplier	-	-
Calvin Asset Management Limited	Other SEC Party	-	-
Northern Powergrid Metering Limited	Other SEC Party	Clarity should be added to the ability to modify the previous entries where a more efficient path becomes available to also include the ability to remove paths that have had issues identified.	SECAS will be able to update the FIR retrospectively. This is not called out in legal text but will form part of the solution and is covered in the Modification Report.
British Gas	Large Supplier	Particularly useful for meters we won't have installed ourselves.	-