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# MP207 ‘Allowing Registered Supplier Agents to Maintain Meter Firmware’

## Annex D

## Refinement Consultation responses

### About this document

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This document contains the full collated responses received to the MP207 Refinement Consultation.

## Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	Yes	Yes, but only in a technical way. We do not believe that the fundamental issue of improving firmware update success will be achieved, plus there are much easier ways of achieving the end-goal without this SEC Mod.
<b>OVO Energy</b>	Large Supplier	No	<p>We are yet to see evidence that there is an issue that Parties are seeking a solution to. From the discussions had through the modification process we are also yet to see or hear that there is a demand for this service, which is what this is, a service that is being provided at the expense of Suppliers.</p> <p>The issue outlined in the mod report is that only Suppliers can deploy and activate Firmware. The proposal is for RSA's to be able to deploy the Firmware, but this does not resolve the issue specified as Suppliers will still need to activate it.</p> <p>We believe that the solution only adds a level of complexity and ambiguity.</p>
<b>Utility Warehouse</b>	Large Supplier	No	We do not support the opinion that MOPs and MAMs are in a better position than Suppliers to facilitate the upload of firmware to meters.
<b>Utilita Energy Ltd</b>	Large Supplier	No	<p>We do not agree with the framing of the issue as identified. Outsourcing these operations would not simplify matters, as claimed. Suppliers must make considered and informed decisions as to which versions of firmware to deploy – this modification would not remove this requirement, and would simply outsource the issuance of a single command.</p> <p>Furthermore, this mod aims to remove the need for suppliers to deploy firmware updates to their estate, thus potentially removing the need to have processes and expertise built up for this purpose. However, the mod only deals with deploying firmware to ESME and GSME, which would still leave suppliers</p>

Question 1			
Respondent	Category	Response	Rationale
			requiring processes to monitor and deploy firmware to IDHs, PPMID etc. As these processes are functionally the same, there would be no reason to not also build those processes to handle ESME\GSME at the same time.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	No	<p>We are not persuaded that there is a significant issue to address or a pressing need for RSAs to be able to update firmware, but in any case the modification does not provide a complete solution – the RSA would only be able to do the preliminary deployment of the firmware, not activate it – this would remain with the Supplier.</p> <p>Further, there is no control in the modification for errors if an RSA were to attempt to apply firmware to a supplier's meters without authorisation– to fix this with an error message would add more cost and complexity to the solution.</p> <p>We are also concerned that this proposal could add more complexity to Security Assessments if there is another party involved in firmware upgrades.</p> <p>We also note that without needing to outsource the actual deployment of firmware to third parties, there are already good commercial options for Suppliers to obtain support with preparation for firmware deployment via software service providers.</p> <p>As the RSA firmware service would remain optional for suppliers, if there was limited take up (as seems likely from other negative supplier reactions documented in the report) MP207 would simply be a cost to the industry for little benefit.</p>

## Question 2: Do you agree with the proposed implementation approach?

Question 2			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	No	The requirements within the SEC Mod could be better achieved by the RSA personnel being granted access to utilise a Supplier's firmware deployment tool (i.e. a contractual / personnel agreement between a Supplier Party and their RSA). This would not require a SEC Modification Proposal to implement. Suppliers already delegate this kind of activity... e.g. it is common for Suppliers to have contractual arrangements for an external MOP agent to perform SMART installations on the Supplier's behalf. The MOP agent sends the required service requests on behalf of the Supplier for installation and commissioning purposes, using the Supplier's IT systems.
<b>OVO Energy</b>	Large Supplier	-	-
<b>Utility Warehouse</b>	Large Supplier	No	The proposed implementation approach would add unnecessary complexity to the firmware update process as it would require coordination with an additional party with additional tracking of the Service Requests.
<b>Utilita Energy Ltd</b>	Large Supplier	No	We do not believe that the modification as it stands should be implemented, as the benefits as set out in the modification report cannot be realised.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	No	We do not support the proposal.

### Question 3: Will there be any impact on your organisation to implement MP207?

Question 3			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	Yes	Our organisation, along with other large Suppliers, would need to pay for the SEC Mod, but have no use for it.
<b>OVO Energy</b>	Large Supplier	No	Apart from the cost of this modification, we would not opt to use this service.
<b>Utility Warehouse</b>	Large Supplier	Yes	Firmware updates are triggered upon our request only after internal testing to ensure compliance with our adaptor and back-end systems. The new process would remove an element of control of that decision. Our current process utilises support from our adaptor host who initiates upgrades on our request. Our adaptor host would have to redevelop their automated solution that applies and tracks the progress of the firmware updates, and then we would need to redevelop the joint processes.
<b>Utilita Energy Ltd</b>	Large Supplier	Yes	If we were to utilize a service enabled by this modification, we would have to completely rebuild our current automated processes and system that deal with firmware updates, as the activation portion of these processes would need an alternative trigger.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	Yes	There would be a cost implication for introducing the necessary industry changes to facilitate the RSA firmware service which we will incur whether or not we actually use the RSA firmware service.

## Question 4: Will your organisation incur any costs in implementing MP207?

Question 4			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	£100k-£250k	This would be our share of the SEC Mod costs and we would not gain any value from this.
<b>OVO Energy</b>	Large Supplier	Yes	Yes, if approved we would be paying for a service that we have no intention of using.
<b>Utility Warehouse</b>	Large Supplier	Less than £100k	<p>If the modification is not implemented, we will continue with the current process, with costs that we are prepared to incur.</p> <p>We have not identified any cost savings we may achieve as a result of implementation of this modification.</p> <p>We will incur costs in redeveloping the automated process utilised by our adaptor provider if this modification were to be implemented.</p>
<b>Utilita Energy Ltd</b>	Large Supplier	£250k-£500k	As previously mentioned, we would need to extensively overhaul our automated processes and systems. Additionally, there would be further ongoing costs in the form of contracting these services out to an offering party.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	Less than £100k	There will be a cost implication for introducing the necessary industry changes to facilitate the RSA firmware service which we will incur whether or not we actually use the RSA firmware service.

## Question 5: How long from the point of approval would your organisation need to implement MP207?

Question 5			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	We would not implement the solution	The issue being addressed would be of potential use to perhaps a very small number of Suppliers.
<b>OVO Energy</b>	Large Supplier	Immediately	We would not make use of this service
<b>Utility Warehouse</b>	Large Supplier	-	-
<b>Utilita Energy Ltd</b>	Large Supplier	6 – 8 Months	Due to the scope of changes to systems and processes we would require significant time to build and test these. Time would additionally be required to negotiate and agree contracts to replace these processes.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	6 months	The long lead time from approval noted in the Modification Report would cover our required lead time.

## Question 6: Do you believe that MP207 would better facilitate the General SEC Objectives?

Question 6			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	No	We do not believe that any fundamental improvements would be forthcoming from MP207
<b>OVO Energy</b>	Large Supplier	No	-
<b>Utility Warehouse</b>	Large Supplier	No	We believe we are already meeting the objective of N or N-1 firmware as best we can with 95% of meters satisfying this requirement. Therefore, we don't believe that implementation of this modification would better facilitate the General SEC Objectives.
<b>Utilita Energy Ltd</b>	Large Supplier	No	<p>We believe that this modification would negatively affect General SEC Objectives:</p> <p>Objective (a) would be negatively affected as a supplier would have to have two different processes for maintaining firmware depending on the device – E\GMSE vs IHD or PPMID, for example. Additionally these suppliers would still need a process to activate the deployed firmware.</p> <p>We recognise that a Supplier would be under no obligation to outsource their processes, however the paragraphs above applies whether they chose to or not.</p>
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	No	We believe that MP207 would not better facilitate Objective (a) as it is not likely to lead to efficiency in the operation of smart metering systems.



## Question 7: Do you believe there will be any impacts on or benefits to consumers if MP207 is implemented?

Question 7			
Respondent	Category	Response	Rationale
<b>EON UK</b>	Large Supplier	No	Additional costs on industry to implement and support MP207 will eventually be paid by consumers. There are more cost-efficient ways to achieve the same goal without MP207.
<b>OVO Energy</b>	Large Supplier	No	-
<b>Utility Warehouse</b>	Large Supplier	No	Impacts would only be worsened by implementation of this modification as it would require coordinating a process that would include an additional party, making it more difficult to ensure the latest firmware is applied to a consumer's meter.
<b>Utilita Energy Ltd</b>	Large Supplier	No	We believe that the majority of consumers will not see a noticeable difference from this modification, as the proposal simply changes who does parts of an already existing process.
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	No	There is no discernible benefit to consumers from this modification, and there may be a disbenefit if the involvement of RSAs in firmware upgrades leads to inefficiencies in the process which result in non-functioning meters.

## Question 8: Noting the costs and benefits of this modification, do you believe MP207 should be approved?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
<b>EON UK</b>	Large Supplier	No	MP207 provides a very limited benefit and does not cover firmware activation, PPMID deployments or interactions with customer data or direct with the end-customer.	-
<b>OVO Energy</b>	Large Supplier	No	Ultimately if this modification was approved, we would be paying for a service that we would not be utilising. We are yet to see any evidence of any demand for this service either. Until those that wish to use the service come forward, we cannot fully understand the benefits of this modification. We feel that this would be far better suited as an Elective Service.	SECAS has explored the Elective Services route with the DCC, however, as there are changes to SEC Appendix AD 'DCC User Interface Specification' (DUIS) required, the Proposed Solution would not be viable for an Elective Service. (Any DUIS changes must be done via a SEC Modification)
<b>Utility Warehouse</b>	Large Supplier	No	-	-
<b>Utilita Energy Ltd</b>	Large Supplier	No	Taking into account that suppliers who choose to take up a service enabled by this mod would still have to have processes in place to deploy and activate firmware, the cost to implement far outweighs the benefits that would be provided.	-
<b>ENGIE (ENGIE Power Limited,</b>	Small Supplier	No	Please see comments on Question 1.	-

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
ENGIE Gas Limited)				

## Question 9: Please provide any further comments you may have.

Question 9		
Respondent	Category	Comments
<b>EON UK</b>	Large Supplier	<p>The costs for MP207 will eventually be paid for by energy consumers to allow RSAs to make profits via an additional revenue stream. The same end-result can be achieved by the RSA using Supplier systems under contractual arrangements.</p> <p>The RSA personnel could be granted access to utilise a Supplier's firmware deployment tool (i.e. a contractual / personnel agreement between a Supplier Party and their RSA). This would also allow continued automation of the download-activate sequence of firmware deployment which would be broken under MP207 if the RSA downloaded the firmware image using their own deployment system.</p> <p>Under MP207, there would still need to be contractual agreements in place to allow the RSA to obtain the Manufacturers' firmware images for deployment and to cover the scope of the RSA activities.</p>
<b>OVO Energy</b>	Large Supplier	-
<b>Utility Warehouse</b>	Large Supplier	A supplier could maintain an even higher level of firmware update by being able to readily access the latest firmware from the full range of manufacturers, without each supplier having to negotiate separate contracts with each manufacturer.
<b>Utilita Energy Ltd</b>	Large Supplier	-
<b>ENGIE (ENGIE Power Limited, ENGIE Gas Limited)</b>	Small Supplier	No further comments.