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MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date' Refinement Consultation responses Annex B

About this document

This document contains the full collated responses received to the [MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'](#) Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	Whilst we are concerned at the overall timelines associated with switching from one version to another, given that this transition coming so close to the switch to 4G comms hubs would result in increased industry cost and potential aborted installations, this seems a prudent move.
EDF	Large Supplier	Yes	The industry has yet to move over to GBCS v3.2 meaning there are large amounts of GBCS v2.1 stock held by EDF and other suppliers. Furthermore, manufacturing of GBCS v.21 continues. Based on these facts, EDF agrees that there is no possibility of being able to use this stock before the current end date, and that an extension to the install date is appropriate, and effectively resolves the issue.
EON	Large Supplier	Yes	It will permit the installation of a very large number of comms hubs that would otherwise need to be scrapped.
Octopus Energy Ltd	Large Supplier	Yes	It will provide reasonable period of time to transition to GBCS4.1 hubs, as long as there are no slippages to the GBCS4.1 delivery.
OVO	Large Supplier	Yes	Yes, the solution put forward will resolve the issue, providing that there are no major issues with the 4G rollout that could force suppliers to maintain old stock on v2.1.
Utilita Energy Ltd	Large Supplier	Yes	We agree that extending IVP and MVP end dates will avoid unnecessary scrappage of viable assets.

Question 2: Do you agree that the legal text will deliver MP243?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
British Gas	Large Supplier	No	The maintenance end date needs to move in parallel surely?	The proposed solution to this modification is to only extend the Installation End Date. The rationale behind this is that not extending the Maintenance End Date means that the DCC, under all reasonable steps, must upgrade the Communications Hub to the latest version of firmware.
EDF	Large Supplier	Yes	The proposed new date in the CHTS table matches the proposed extension.	
EON	Large Supplier	Yes	The legal text correctly extends the IVP end date but not the MVP end date.	
Octopus Energy Ltd	Large Supplier	Yes	<p>Although I know this was discussed, I am still not sure the Maintenance End Date remaining as 31/05/2024 (an earlier date than the Installation End Date) works. It means that devices could be installed between 31/05/2024 and 30/04/2026 (the proposed Installation End Date) which I am not sure the implications are.</p> <p>Will CH devices operating on GBCS2.1 installed between 31/05/2024 and 30/04/2026 be targeted for Firmware Upgrade by the CSP?</p> <p>Will it prevent Incidents being raised against them?</p>	After install and commissioning, CSP's manage CH upgrades as normal business operations. Dependent on the firmware which the CH has at installation, it can take multiple upgrades to get onto the latest version. Both CSP's will continue to upgrade regardless of if the CH has an expired TSAT date. If a CSP has a problem upgrading a Device then an incident should be raised. Where an Incident is raised normal incident management process is

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Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			I am not sure the Maintenance Validity Period in the SEC is clear in its definition as to what the Operational Implications of this end date is for CHs.	followed and CSPs will continue to support Incidents on Devices with an expired TSAT date. CSP's will also seek to have CH's running on the latest firmware version.
OVO	Large Supplier	Yes	Yes, according to the 'MP243 Legal Text v0.2' file, although it could be better written in text what the proposed plan is.	
Utilita Energy Ltd	Large Supplier	Yes	No comments.	

Question 3: Do you agree with the proposed implementation approach?

Question 3			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This is a continuation of changes made previously but we have a level of concern that the stock of hubs is being managed appropriately in the run up to 4G transition in order to minimise the costs associated with old stock. The repeated changes to this date reinforce this concern.
EDF	Large Supplier	Yes	Straightforward change. 2 months to implementation seems reasonable, and alternative plans in place should a decision be made later than expected.
EON	Large Supplier	Yes	Avoids financial and environmental cost.
Octopus Energy Ltd	Large Supplier	Yes	
OVO	Large Supplier	Yes	Yes, as the postponement (by 2 years) of the Installation End Date should provide suppliers adequate time to install the affected devices.
Utilita Energy Ltd	Large Supplier	Yes	The implementation approach outlined makes sense based on the installation end date being amended.

Question 4: Will there be any impact on your organisation to implement MP243?

Question 4			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	Given this is continuing the status quo this is operationally the least worst option.
EDF	Large Supplier	No	No changes required.
EON	Large Supplier	No	There are no impacts.
Octopus Energy Ltd	Large Supplier	No	Only a positive impact by having additional time to install GBCS2.1 Devices.
OVO	Large Supplier	Yes	There will be a small impact as some back-office actions will need to be carried out to allow us to prioritise the installation of v1.1 devices, followed by v2.1 devices.
Utilita Energy Ltd	Large Supplier	Yes	This change would allow us to continue to install our existing inventory of such devices.

Question 5: Will your organisation incur any costs in implementing MP243?

Question 5			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No costs	This modification continues the current position
EDF	Large Supplier	No costs	No costs to implement
EON	Large Supplier	No costs	There are no costs
Octopus Energy Ltd	Large Supplier	No	
OVO	Large Supplier	No costs	We do not expect to incur any extra costs by implementing MP243. To the contrary, the extension will allow us to install a significant amount of stock that we would otherwise have had to scrap.
Utilita Energy Ltd	Large Supplier	No costs	No costs associated with this implementation. This would be a cost saving as we would no longer be forced to return or scrap remaining inventory of these devices.

Question 6: How long from the point of approval would your organisation need to implement MP243?

Question 6			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	N/A	There is no change to implement on our side.
EDF	Large Supplier	0	No changes required.
EON	Large Supplier	No time required	This is a SEC change that simply allows installation of comms hubs in stock.
Octopus Energy Ltd	Large Supplier	None	No time required to support this modification
OVO	Large Supplier	2 weeks	We estimate it would take us circa two weeks to implement the necessary back-office actions that would allow us to prioritise the installation of v1.1 devices.
Utilita Energy Ltd	Large Supplier	None	No changes to existing business processes required.

Question 7: Do you believe that MP243 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This mod supports SEC objective A in the short term but note the general risk of increased stock of present generation of hubs that will need to be carefully managed over the proposed extension period.
EDF	Large Supplier	Yes	MP243 minimises waste and allows the Smart rollout to continue efficiently.
EON	Large Supplier	Yes	
Octopus Energy Ltd	Large Supplier	Yes	It would prevent a large volume of CHs being wasted which would incur cost and be environmentally wasteful
OVO	Large Supplier	Yes	A
Utilita Energy Ltd	Large Supplier	Yes	We believe that this modification would better facilitate General SEC Objective (a) by avoiding the unnecessary disposal of viable assets. It also minimises the environmental impacts of doing the same.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP243 is implemented?

Question 8			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	No	-
EDF	Large Supplier	No	No impact. Impacted if not implemented.
EON	Large Supplier	Yes	The aforementioned potential costs of scrappage do not need to be passed onto customers, and the environmental impacts.
Octopus Energy Ltd	Large Supplier	Not applicable	I don't think it will affect consumers negatively or positively.
OVO	Large Supplier	Yes	We believe there would be financial and operational benefits to the consumer, either directly or indirectly, as the implementation of MP243 would allow us to continue to install existing stock (without the need to scrap a significant portion of it) and also could allow the mitigation of unforeseen issues that might arise from the 4G rollout.
Utilita Energy Ltd	Large Supplier	Yes	Avoiding wasting millions of assets avoids passing through unnecessary charges to consumers.

Question 9: Noting the costs and benefits of this modification, do you believe MP243 should be approved?

Question 9			
Respondent	Category	Response	Rationale
British Gas	Large Supplier	Yes	This mod avoids the potential costs of recovering current generation comms hubs so on balance is beneficial.
EDF	Large Supplier	Yes	Small cost to industry, no additional cost to implement for EDF. Avoids a large amount of waste, and prevents impact to Smart rollout.
EON	Large Supplier	Yes	Common sense
Octopus Energy Ltd	Large Supplier	Yes	It will reduce industry wide costs by enabling additional time to install Devices given the delays to GBCS 4.1 CHs (the next manufacturing version).
OVO	Large Supplier	Yes	We believe MP243 should be approved as it would allow us to continue to install, and deplete, v1.1 devices which make up the lion's share of our stock-holding.
Utilita Energy Ltd	Large Supplier	Yes	The benefits from this modification outweigh negatives, therefore we believe it should be approved and implemented.

Question 10: Please provide any further comments you may have.

Question 10		
Respondent	Category	Comments
British Gas	Large Supplier	Given all of the assets that are connected to the DCC are on later versions of GBCS, this mod should make it clear if there are any technical limitations at first install due to operating a GBCS 2.1 hub with a meter/display on a later version and the likely timescale for the hub to be upgraded, which is managed by the DCC.
EDF	Large Supplier	No
EON	Large Supplier	No further comments.
Octopus Energy Ltd	Large Supplier	-
OVO	Large Supplier	-
Utilita Energy Ltd	Large Supplier	No further comments.