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MP137 ‘Sharing information on Defects and Issues’

Annex D

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP137 Refinement Consultation.

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

Question 1			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	Yes	It possibly resolves the issue as drafted but I am not convinced it does resolve the real issue as there is no mention of the DCC adapter being used by the supplier. Often perceived “issues” with meters are actually issues with orchestration of commands / interaction with the DCC.
E.ON	Large Supplier	Yes	We support this change provided commercial and confidentiality concerns are overcome for all parties. <i>In response to a question in the modification document around the information currently stored in DSMS:</i> We understand the DCC Service Management Systems (DSMS) operated by the DSP has reached end of life and is viewed as not fit for purpose and the DCC are currently reprocurring for a replacement.
British Gas	Large Supplier	No	We like the principle of sharing this type of information, but we don't think the proposed solution is practical or would deliver sufficient quality of information. We recognise the concerns already raised in the Modification Report (manufacturer concerns on commercial sensitivity, reliability of information, ensuring all parties contribute, etc.).
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	A database where issues, defects and unusual device behaviour will be recorded that can be easily accessed by SEC parties will improve efficiency and be a tool to identify fixes more quickly.

Question 1			
Respondent	Category	Response	Rationale
EUA – Energy and Utilities Alliance	Other SEC Party	No	<p>The EUA membership position has always been clear that there are existing commercial mechanisms area available and should be used to deliver these requirements.</p> <p>EUA Member feedback on this latest proposal is that they do not have the resource to contribute to the set up and ongoing review requirements that this additional reporting process would require.</p> <p>With regards to inclusion of Security and Safety and Billing concerns, whilst knowing that there are other mechanisms, also has the potential for future confusion as newer market participants e.g. new Energy Suppliers will be looking at differing sources of data and processes. Said items should not be included in a new database.</p>
Utilita Energy Ltd	Large Supplier	Yes	<p>We believe that a centralised database of defects and issues can only serve to strengthen the Smart metering infrastructure as a whole, giving all Parties access to the same information in order to effectively manage all of the devices on their estate.</p> <p>We do, however, note that this issue cannot be effectively resolved without the active participation of meter manufacturers. The stated concerns of Meter Manufacturer's should not override the need for effective operation of energy consumers smart metering devices.</p>
Utility Warehouse	Large Supplier	No	<p>We believe that it is very close to a solution.</p> <ol style="list-style-type: none"> 1) Resolutions of defects often require an update to the next Firmware version which contains a coded solution. We would also like to see a Workaround that could be applied until the firmware with the resolution is available for use in Production. Not all Workarounds provide a perfect solution, and as long as that is made clear, then the supplier would be able to make a judgement on whether or not it is suitable for them to apply it. Perhaps Workarounds could be "graded" according to the reliability of the workaround solution.

Question 1			
Respondent	Category	Response	Rationale
			<p>2) An initial starting point would be to populate the database with defects that are already listed as fixed in a subsequent firmware release. The Manufacturers have already agreed that this information is available in the Release Notes and that the suppliers can ask to have access to those even outside of contract. However, the information is high level, and we would expect a more detailed explanation of the cause, impact and workaround. This would enable suppliers gaining devices that they do not have the knowledge of to have a readily available source of defect information and solutions. It also means that when investigating issues on older firmware we no longer have to recall if it is a Known Issue and read through a range of Release Notes to confirm this.</p> <p>3) For defects that are found in current releases, the manufacturers should be able to choose to publish those once they reach a genuine level of confidence that it is a genuine issue that requires a resolution to be provided by them.</p> <p>4) If we desire a database of defects that are currently being investigated then that should be maintained separately in a system such as HP ALM with formal update and discussion sessions as provided for the test teams.</p>
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 2: Do you agree that the legal text will deliver MP137?

Question 2			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	-	-
E.ON	Large Supplier	No	<p>The legal text is very limited to the DCC creation of a database. Additional legal text is needed for the data that sec parties provide the DCC to enter to the database, and the use of this data by sec parties. E.g., Parties should make provision to validate the defect/issue in their own test environments and production systems prior to using suggested remediation pathways.</p> <p>We appreciate the concerns of confidentiality, reputation, and risk, that device manufacturers have shared, which SECAS has written in the modification report. However, we believe this can be overcome through good legal text that protects device manufacturers from reputational damage. Suppliers, or other SEC parties would be very careful not to share issues that might be prejudicial to ongoing investigations by (or disputes with) manufacturers (i.e. having potential legal/commercial implications under warranties, etc) and/or share information which they have obtained under commercially confidential arrangements. E.ON will not share information into such a public arena without obtaining necessary approvals/consents to do so. Device manufacturers may decide to re-use the known issues they may publish through release notes as they may not test Device Model Combinations so the requirement would shift to the DCC to share DMC issues.</p>
British Gas	Large Supplier	Yes, but some comments	<p>In the Definitions section (now renumbered to H16.16), should the definition of database also confirm that it will be searchable by authorised users?</p> <p>In the new H16.15 section on SMETS2 Issues and Defect Reporting:</p>

Question 2			
Respondent	Category	Response	Rationale
			<p>1. Is it right that it should be limited to SMETS2 Devices only? Wouldn't it also be useful to cover any known issues with enrolled SMETS1 Devices that may occur over time.</p> <p>Will the Source of the report (in H16.15(c)) specify the name of the party who reported the issue? Or just the generic source (Manufacturer, MAP, Supplier, etc.)</p>
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	The legal text reads to deliver the mod.
EUA – Energy and Utilities Alliance	Other SEC Party	No	The SEC cannot obligate parties to provide input to such a database, hence in theory it could be developed with fields to populate but not maintained if data is not available. In addition even if it were viable there is no mention of parties' rights to agree publishing or not of specific items that may pertain to their devices and commercial protection.
Utilita Energy Ltd	Large Supplier	Yes	No further comments.
Utility Warehouse	Large Supplier	No	Yes, except it requires mention of appropriate workarounds until the resolution is available.
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

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

Question 3			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	Yes	-
E.ON	Large Supplier	Yes	The content for the database is paramount. Device manufacturers, including CSP, should not limit the data by only copy pasting known issues from release notes for DCC to enter. Device model combinations that exhibit the issue also need to be shared along with perceived impact of the issue, and once available, the remediation pathway. Device Model Combinations of esme, gsme, comms hub, that exhibit the issue, should be searchable with model and firmware version.
British Gas	Large Supplier	No	See answer to Question 1 above.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	SECAS has looked at the earliest release date this mod can be implemented.
EUA – Energy and Utilities Alliance	Other SEC Party	No	We believe that adding additional reporting layers of this nature may lead to incorrect reporting of commercially sensitive data without the affected parties' permission. Issues/defect situations change during their lifecycle hence reports of this nature could grow to a stage where update administration is not accurate or viable.

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Question 3			
Respondent	Category	Response	Rationale
Utilita Energy Ltd	Large Supplier	Yes	No further comments.
Utility Warehouse	Large Supplier	-	-
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 4: Will there be any impact on your organisation to implement MP137?

Question 4			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	Yes	Energy suppliers may automatically assume devices are faulty based on trawling the database when the existence of an issue from someone else won't necessarily mean there is an issue with all meters of that type. It may be, incorrectly, used as an excuse not to send fault information to demonstrate an actual (not potential) fault with a meter
E.ON	Large Supplier	Yes	<p>We will consult with the suppliers of devices we procure from prior to deciding if and when to submit issues from a supplier perspective or influence device manufacturers to share or not to share issue that may affect us commercially.</p> <p>E.ON reserves the right not to submit any device defects/issues into the database, where we do not receive sufficient reassurance on the confidentiality and security controls enforced over the DCC solution.</p>
British Gas	Large Supplier	Yes	There would be quite a lot of work to input and submit information into the DCC system, and answer any further clarification questions from the 1 FTE managing the information.
National Grid Electricity Distribution	Network Party	No	-
Scottish and Southern Electricity Networks	Network Party	No	N/A

Question 4			
Respondent	Category	Response	Rationale
EUA – Energy and Utilities Alliance	Other SEC Party	Yes on our members	<p>Manufacturers would be required/requested to be involved in agreeing and setting up new processes as well as contributing to existing defects and ongoing database updates. Manufacturers are unlikely to have available resource to be able to react to issues or defects raised by multiple parties.</p> <p>We also have concerns that the new database could be seen by some as a way of getting triage carried out on devices they may operate without having to invest the time and resource to meet their SEC obligations themselves. We do understand that in some cases Energy Suppliers are looking at issues on devices they may not have installed and commissioned. However, as mentioned there are commercial processes that exist for virtually all meters in the GB market including those installed via the DCC.</p>
Utilita Energy Ltd	Large Supplier	No	There would be no impact beyond making relevant internal parties aware of the existence of the new resource.
Utility Warehouse	Large Supplier	Yes	-
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 5: Will your organisation incur any costs in implementing MP137?

Question 5			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	No	-
E.ON	Large Supplier	Yes	We will consult with the suppliers of devices we procure from prior to deciding if and when to submit issues from a supplier perspective or influence device manufacturers to share or not to share issue that may affect us commercially.
British Gas	Large Supplier	Less than £100k	No systems costs anticipated, but there would be costs associated with preparing and submitting information into the database, and then searching/extracting information when required. We are not convinced how user-friendly or reliable the database would be in practice.
National Grid Electricity Distribution	Network Party	No costs	-
Scottish and Southern Electricity Networks	Network Party	No costs	N/A
EUA – Energy and Utilities Alliance	Other SEC Party	Yes our members would.	At this stage we could not provide an assessment of our members costs as for example we have no way of knowing the level of issues or defects that could be reported by multiple parties. However, we believe the costs could be significant to a point that they would not be viable.

Question 5			
Respondent	Category	Response	Rationale
			<p>As noted in Annex B this database and related processes would be labour intensive for DCC and would also be the case for SECAS as well as Device Manufacturers.</p> <p>It should also be noted that this process provides no commercial mechanisms to recover costs for parties outside the DCC and SECAS, for example Manufacturers set up costs and reviewing the issues/defects raised.</p>
Utilita Energy Ltd	Large Supplier	No costs	There would be no cost to us associated with implementing this modification.
Utility Warehouse	Large Supplier	£100k-£250k saved	<p>We could implement our own database of Known Issues, so the central development would save on those costs, and would be shared between Suppliers.</p> <p>The degradation of the knowledge of issues within older releases leads to repeat discussions, poor service to customers, and incorrectly replaced devices which incur their subsequent early removal costs. It is this factor that leads me to propose the impact is higher than just £100k.</p>
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 6: How long from the point of approval would your organisation need to implement MP137?

Question 6			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	N/A	-
E.ON	Large Supplier	6 - 12 months	To maintain commercial agreements with device manufacturers and MAP's that we decide this consultation requires.
British Gas	Large Supplier	n/a	We could start to support the database from the date it were introduced.
National Grid Electricity Distribution	Network Party	N/A	-
Scottish and Southern Electricity Networks	Network Party	N/A	N/A
EUA – Energy and Utilities Alliance	Other SEC Party	Unknown and likely impractical to do so	-

Question 6			
Respondent	Category	Response	Rationale
Utilita Energy Ltd	Large Supplier	No lead time	As there are no actions required from us as part of this implementation, we would not require any lead time.
Utility Warehouse	Large Supplier	No	We would not be contributing data, but would be a welcome user of it when it becomes available.
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 7: Do you believe that MP137 would better facilitate the General SEC Objectives?

Question 7			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	No	None are mentioned in the Mod report. I think this modification risks causing as many issues as it solves.
E.ON	Large Supplier	Yes	We believe this helps “Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers’ premises within Great Britain.” SEC parties that take advantage of the data provided through this change, helping “Facilitate energy consumers’ management of their use of electricity and gas through the provision of appropriate information via smart metering systems”
British Gas	Large Supplier	Yes	We think this would better facilitate General SEC Objectives (a) and (c). NB, the section that normally reviews the impact of the proposed modification on the General SEC Objectives seems to be missing from the draft MP137 Mod Report?
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern Electricity Networks	Network Party	Yes	MP137 would better facilitate the General SEC Objectives as this would allow for defects to be picked up and sorted quicker.

Question 7			
Respondent	Category	Response	Rationale
EUA – Energy and Utilities Alliance	Other SEC Party	No	Energy suppliers have clear SEC obligations around being responsible for operating meters they have installed or gained. There are existing arrangements that allow for Energy Suppliers to engage with their Meter Asset providers or in some cases direct with Manufacturers to gain such information which may already be shared as part of commercial contracts. Whilst this may not be the intentions, we believe in this case that the SEC could effectively end up being used to circumvent existing commercial arrangements.
Utilita Energy Ltd	Large Supplier	Yes	We believe this modification would better facility General SEC Objectives (a) and (d). Having a freely accessible record of defects, issues and the associated fixes will promote interoperability across Supplier estates where they may not have an existing relationship with that Manufacturer, which would also help the range of devices they can fully support and manage.
Utility Warehouse	Large Supplier	Yes	It would clearly increase the efficiency with which we could satisfy the first objective “Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers’ premises within Great Britain.” By providing more information about the unfortunate inefficiencies inadvertently caused by defects within the devices.
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP137 is implemented?

Question 8			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	No	As per response to questions 1 and 7 I am not sure it will benefit consumers. How many known issues are resolved by upgrading to the latest firmware? Is that not likely to be the solution in a large proportion of cases?
E.ON	Large Supplier	Yes	Provided energy suppliers use the data to deliver a solution to consumers to keep or make their assets smart, consumers will receive an improved smart experience.
British Gas	Large Supplier	Yes - positive	As an industry we recognise that all parties should be aligned with protecting the life of meter assets, both <ul style="list-style-type: none"> (a) to improve the overall customer experience of smart (meters working correctly, less intrusion with visits to fix errors), and (b) to keep costs under control across the industry, by not overspending on meter resolutions where we could have dealt with matters more efficiently if we had access to this sort of data. Sharing information on known meter faults and resolution seems to be a key part of this, but we are not sure the proposed solution is the best route. See our answer to Question 10 for more thoughts.
National Grid Electricity Distribution	Network Party	Yes	-
Scottish and Southern	Network Party	Yes	There would be benefits to consumers as this mod would enable SEC parties to identify fixes more quickly.

Question 8			
Respondent	Category	Response	Rationale
Electricity Networks			
EUA – Energy and Utilities Alliance	Other SEC Party	No	None that could not already be met by actually using current commercial arrangements and adding additional layers of administration could provide confusion and incorrect information.
Utilita Energy Ltd	Large Supplier	Yes	Having a platform for sharing issues and their resolutions benefits consumers as this will enable all Suppliers to apply the same fixes for meters on their estates regardless of the commercial agreements in place.
Utility Warehouse	Large Supplier	Yes	This would lead to speedier identification of issues to each Supplier instead of the current situation in which we each need to either manage the knowledgebase of Known Issues and solutions, or we each waste time investigating issues in the current firmware. This would lead to spending our time and finances on focusing on efforts to provide a satisfactory service to our consumers.
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

Question 9: Noting the costs and benefits of this modification, do you believe MP137 should be approved?

Question 9			
Respondent	Category	Response	Rationale
Smart Meter Assets 1 Limited	Other SEC Party	No	Not without further investigation into the actual benefits and consideration of how reliable the information may be (noting that if it isn't 100% reliable the best action is likely to remain contacting the manufacturer directly or via the MAP)
E.ON	Large Supplier	Yes	Provide the commercially sensitive issues outlined through the modification report and the legal text are improved.
British Gas	Large Supplier	No	We realise it is low cost, but we are not convinced the proposal would be the best way of approaching this.
National Grid Electricity Distribution	Network Party	-	We don't feel at the moment we have enough information to be able to provide a view. We question how will the data be verified and if not mandated why the DB&T pass through charge?
Scottish and Southern Electricity Networks	Network Party	Yes	The proposal has noted that there is no cost to SEC party anticipated.
EUA – Energy and Utilities Alliance	Other SEC Party	No	As per positions clearly stated we believe this is an additional layer of administration.
Utilita Energy Ltd	Large Supplier	Yes	We believe the benefits to consumers and interoperability mean this modification should be implemented.

Question 9			
Respondent	Category	Response	Rationale
Utility Warehouse	Large Supplier	Yes	I am very keen to see this implemented as the size of the knowledgebase on known issues continues to increase as the industry ages. This requires a more considered approach to the collation of the issues and resolutions.
Landis+Gyr	Other SEC Party	(Confidential Response)	(Confidential Rationale)

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

Question 10		
Respondent	Category	Comments
Smart Meter Assets 1 Limited	Other SEC Party	It feels like there is something to look at here as it is in everyone's interests to maintain meters and not remove unnecessarily but I just fear this Modification may have unintended consequences and only stands if we are confident that an issue seen in one DMC, CH, supplier / DCC adapter, region combination will impact elsewhere (with the last 2 items not being suggested to triangulate common rather than specific issues)
E.ON	Large Supplier	-
British Gas	Large Supplier	<p>We definitely recognise the need for something like this. However, we are not convinced this is the right solution. Most significantly, for it to work, we believe it would require much more than just one person to fully validate all the information. To be fit for purpose, there would be a need to a process to confirm any reported issue was a true meter issue, and ensure that issues were consistently and accurately documented. It isn't clear how contribution to the database would be mandated, which may lead to lots of reports from some parties, and minimal from others.</p> <p>Ideally manufacturers would provide suppliers with direct access to this information surrounding known faults and interoperability issues. Individual suppliers will often have such an arrangement with the main manufacturers they use for installations. However, due to industry churn, every Supplier now is responsible for a broad range of meter assets (including from manufacturers they won't have installed meters from themselves), and many Suppliers (especially Small Suppliers) won't have contractual arrangements with all the manufacturers.</p> <ul style="list-style-type: none"> - Qn: Could manufacturers volunteer (or be mandated) to make access to their support portals available to all Suppliers? <p>Alternatively, we wondered if this could be arranged via MAPs. As asset owners, they have an incentive to protect revenue from meter assets, and will want to know meters are being properly maintained and protect life expectancy.</p> <ul style="list-style-type: none"> - Qn: Would a MAP enabled solution be an alternative option?

Question 10		
Respondent	Category	Comments
		Finally, is it possible for this information role to be undertaken by “Top Issues”, if perhaps some minor changes were made to that scheme. Could the output of “Top Issues” populate the database?
National Grid Electricity Distribution	Network Party	-
Scottish and Southern Electricity Networks	Network Party	N/A
EUA – Energy and Utilities Alliance	Other SEC Party	-
Utilita Energy Ltd	Large Supplier	No further comments
Utility Warehouse	Large Supplier	-
Landis+Gyr	Other SEC Party	(Confidential Comments)