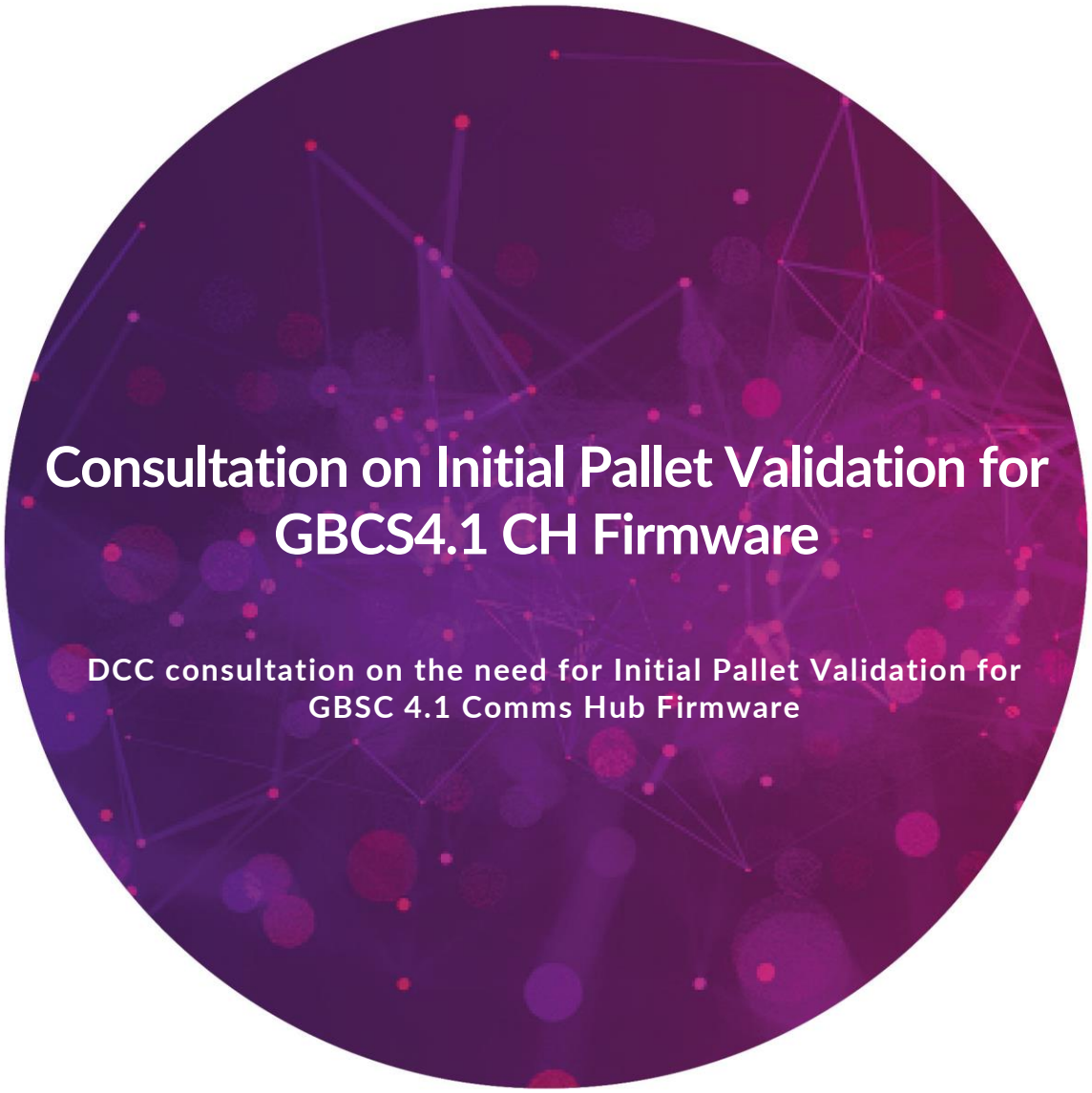
Data Communications Company



Consultation on Initial Pallet Validation for GBCS4.1 CH Firmware

DCC consultation on the need for Initial Pallet Validation for GBSC 4.1 Comms Hub Firmware

Date: 03 March 2023
Respond by: 31 March 2023
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1. Introduction

The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the Office of Gas and Electricity Markets (Ofgem) to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out of second-generation (SMETS2) smart meters, as well as the migration of existing first-generation (SMETS1) meters onto the DCC network.

2. Background

The Great Britain Companion Specification (GBCS) describes the detailed requirements for communications between Smart Metering Devices in consumers' premises and the DCC.

DCC is currently in the process of implementing an updated version of GBCS (version 4.1) under its GBCS 4.1 programme of work. DCC manages the delivery of this latest version through a governance framework which includes governance groups under which the GBCS is controlled. These includes the Smart Energy Code (SEC) Operations Sub-Committee (OPSG) and the Smart Metering Implementation Programme's Implementation Managers Forum (IMF).

In discussion at these groups, (including the July 2022 OPSG (75_1207) and further presented at the July 2022 IMF), Energy Suppliers have requested that DCC undertake a period of Initial Pallet Validation (IPV), where the first devices incorporating the new GBCS version 4.1 will be made available for trialling, prior to a mass manufacture decision as to whether to apply the new GBCS version to all new devices.

At the February 2023 OPSG meeting (88_1402), the group provided a recommendation that DCC should undertake an industry consultation on whether to include an Initial Pallet Validation phase for the GBCS 4.1 Communication Hubs variants (as shown in Slide 4 of Annex A) and this was subsequently endorsed at the February 2023 SEC Panel Meeting (113).

This document constitutes DCC's consultation as requested by the OPSG. This consultation will be open for four weeks and will close for responses on Friday 31 March 2023. DCC will use this consultation process to seek stakeholders' views on how this programme is impacted if an IPV period is introduced, against the current baseline plan (which does not currently include an Initial Pallet Validation phase), and will present findings at the April 2023 OPSG, with a recommendation presented to SEC Panel for a final decision. It was also agreed at February's IMF that there will be a quarterly update on GBCS 4.1 in April 2023, which will include an update on this consultation.

Historically DCC has recommended IPV assurance when there is a new hardware model introduced and previous examples include Release 2.0 DBHW (Dual Band Hardware) and DB-F (Dual Band Fylingdales). DCC has an agreed IPV process with the Communications Service Providers (CSPs) which flows down to their supply chain and operates smoothly. DCC does not routinely undertake IPV phases when there is no new hardware model, as is the case with the GBCS 4.1 Programme.

As this request is an exception to the process that DCC has previously followed, DCC has engaged the CSPs, and redirected Subject Matter Expert (SMEs), and operational teams across the programme to provide a view of an alternative options for plans which include IPV. The GBCS 4.1 Programme Delivery team are committed to providing support to the SEC Parties to derive a final decision on IPV, whilst current agreed Programme Plan activities are also managed to ensure a minimum disruption to the plan.

3. Purpose of Consultation

The purpose of this consultation is to ensure that DCC have considered SEC Parties' concerns around the need for an IPV Phase and that an informed decision is made on the way forward.

This consultation intends to ensure that DCC and SEC Parties have clarity on the reasons, benefits, and impacts of IPV, so that the DCC Operational Criteria can be appropriately managed. DCC would like SEC Parties to provide an outline of what they intend to test in the IPV phase against the scope of the release. DCC would like to understand whether the IPV phase will be used to test the functionality in its entirety or only certain parts of it (the 2 CRPs and firmware upgrade capability to Prepayment Meter Interface Devices (PPMIDs) and Home Area Network Connected Auxiliary Load Control Switches (HCALCSs)).

Please note that DCC is developing the content of the Network Evolution Migration Approach Document (NETMAD) for the transition from 2G/3G Comms Hubs to 4G Comms Hubs. The responses to this consultation will feed into the policy development that DCC is undertaking. While these responses will feed into the policy development, it is important that Energy Suppliers attend the workshops so that they can provide input into this policy development as the IPV for 4G is an entirely different programme including new hardware.

4. Context

The scope of GBCS 4.1 is set out in Slide 4 of Annex A. The orange shows the available variants (seven) of the Comms Hubs for IPV. The scale of testing included in the GBCS 4.1 release covers the variants across the three Communications Hubs Manufacturers.

The GBCS 4.1 scope includes SECMP0007 and will deliver new functionality supporting firmware updates over the air (OTA) to PPMIDs and HCALCSs. OTA firmware updates through the DCC System are currently supported for the Comms Hubs, Electricity Smart Metering Equipment (ESME), and Gas Smart Metering Equipment (GSME) devices only. Please note that the Comms Hub firmware across Single Band (SB) and Dual Band (DB) Communications Hubs is similar as it is developed from the same code base. DCC is therefore of the view that there is limited benefit in undertaking an IPV for both SB and DB versions.

CRP649 and CRP613 Comms Hub changes will address the operational issues associated with re-using GSME or other meters/devices to install again with the same Comms Hub, which were identified in the GBCS 3.2 CH FW UIT testing discussed as CRP535 issue.

The Toshiba and WNC Comms Hub variants with GBCS 3.2 compliant firmware for CSP-C&S Dual Band Communication Hubs (DBCH) are manufactured and supplied by DCC. Please see Diagram 1 showing the current production Comms Hub variants, with the associated firmware versions and the GBCS compliance.

Diagram 1: GBCS 3.2 Comms Hubs Firmware versions

Comms Hub hardware variant	Comms Hub Firmware Version	GBCS Compliant of the CH FW
Toshiba SBCH	12.36	GBCS 2.1
Toshiba DBCH	13.3	GBCS 3.2
WNC SBCH	3.10.0.7	GBCS 2.1
WNC DBCH	2.0.0.6	GBCS 3.2
EDMI SBCH	2.03.3	GBCS 2.1
EDMI DBCH & DBCH-F	2.13.3	GBCS 2.1

5. Testing

GBCS 4.1 Comms Hub Firmware DCC test exit is quality assured and governed by DCC's Test Assurance Board (TAB) and the SEC Panel's Test Advisory Group (TAG). DCC testing phases cover Pre-Integration Testing (PIT), System Integration Testing (SIT), End-of-Cycle (EOC), Pre-User Testing Services (UTS), User Interface Testing (UIT) and a further Production Pilot phase, which informs and leads to a Mass Manufacturing decision. DCC test phases cover assurance of the full release scope including:

1. New functionality of PPMID and HCALCS Meter OTA;
2. CRP649 will be covered involving installation and commission of a device that is brand new or, a reused device and the Comms Hub behaviour when a GSME that supports CRP613 is reused for Install and Commission without leaving the HAN; and
3. DCC will perform regression testing covering all business scenarios like Comms Hub FW OTA, Meter OTA (ESME, GSME), Comms Hub Replacement, Change of Supplier, Change of Payment mode, Change of Tenancy, Prepayment Top-up, Tariff changes, HAN stability, and soak testing.

DCC has learnt lessons from the testing of previous versions of GBCS and has increased and improved the PIT and SIT testing that is undertaken to ensure that good quality code is available for UIT testing. As part of UIT testing by test participants using their own Devices, DCC tracks how many suppliers have successfully completed seven customer journeys covering:

1. Installation & Commission;
2. Change of Payment mode;
3. Change of Tariff;
4. Change of Tenancy;
5. Change of supplier;
6. Prepayment Top-up; and
7. New Customer Journey added - GBCS 4.1 feature of PPMID device OTA.

Historically, Test Participants in UIT have picked up any issues around Installation & Commission with their own chosen devices such as CRP535 effects when testing GBCS 3.2 CH FW in UIT and filed UIT defects before the Comms Hub enters Pilot stage deployment. The GBCS 3.2 CH FW manufacturing decision was impacted by UIT defects found by participating energy suppliers in GBCS 3.2 CH FW UIT.

The purpose of the UIT phase is to ensure Energy Suppliers have tested effectively which will allow them to ensure they have the built confidence prior to an operational acceptance (OA) decision. The status of testing of these customer journeys by energy suppliers in UIT will feed into the DCC Operational Acceptance process and DCC is of the view that the results of UIT testing will reduce the need for IPV as UIT will provide confidence in GBCS 4.1 CH FW, before a decision to pilot the Comms Hub Firmware is taken. Additionally, the routine GBCS 4.1 UIT progress will be tracked through the twice weekly UIT calls that DCC facilitates with all Energy Suppliers and DCC Stakeholders, which will allow for the building of confidence prior to a decision to mass manufacture or undertake an IPV process.

DCC would like to understand from Energy Suppliers whether they will be doing UIT testing and what this testing will entail.

IPV Q1	Please can you confirm whether you will you be taking part in GBCS 4.1 CH FW UIT Testing. If yes, please provide details of: • the variants (WNC/Toshiba/EDMI – SB / DB) you intend to test in UIT • which of the seven customer journeys you will test against in UIT 1. Installation & Commission; 2. Change of Payment mode; 3. Change of Tariff; 4. Change of Tenancy; 5. Change of supplier; 6. Prepayment Top-up; and 7. GBCS 4.1 feature of PPMID device OTA (new for GBCS 4.1)

6. Approach to GBCS 4.1 mass manufacture

An IPV would provide Energy Suppliers with the opportunity to install a limited number of Comms Hubs in consumers' premises which would allow Energy Suppliers to gain a level of confidence that GBCS 4.1 CH FW in existing Comms Hub hardware model operates as expected. It is anticipated that this period would provide the opportunity for any issues to come to the fore, over and above the Pilot Phase and Mass Over the Air deployment phase which will continue in parallel with an IPV Delivery and Installation Phase. This means any issues found during the IPV Phase will need to be addressed before Comms Hubs are manufactured with GBCS 4.1 CH FW that will enter supply chain to be rolled out.

Other alternatives DCC are considering to help address the IPV ask from Energy Suppliers are as follows:

- The provision of newly manufactured CHs with GBCS 4.1 firmware to UIT for Test Participant testing;
  - For VMO2, depending on the variants required, there is a between 13–16 week lead time from the point of order which could lead to a consequential delay. Depending on the minimum order volumes the cost is approximately £8K per SB and DB variant; and
  - For VMO2 the Remote Test Labs CHs for TOSH and WNC SB and DB will be approximately £10K per variant for minimum order.
  - For TOSH, the proximity of UIT means that it cannot be taken forward, and this option is therefore only potentially viable for EDMI and WNC. DCC is discussing timelines with Arqiva. An alternative possibility is to follow the current available process in UIT where Comms Hub Firmware is upgraded to GBCS 4.1 without any device being commissioned and then use the Comms Hub for validating the Install and Commission business process. As GBCS 4.1 CH FW is not introducing any changes to the manufacturing process this current process is a valid process to use for testing install & commission in UIT test environment.
- The potential use of refurbished CHs in production for IPV from existing warehouse stock, currently on manufactured GBCS 2.1 firmware versions.

These initiatives are currently being assessed by the CH manufacturers to provide DCC with timeline and costing options. These are separate lines of enquiry to the original request of IPV on all variants.

6.1. IPV Planning Principles

DCC's experience of IPV has shaped our views of the planning principles for an IPV phase as follows:

- Each pallet would be distributed to meet Energy Supplier orders where a minimum order is a carton which consists of 28 comms hubs. DCC will facilitate fair distribution of devices to ensure all customer orders are satisfied, which may require some scaling;
- A decision to manufacture the first pallet will be made following a successful OTA Pilot by DCC Operations. The Mass OTA deployment will continue alongside the first pallet delivery IPV phase;
- The IPV installation phase is proposed to be three months as this will allow Energy Suppliers to reach acceptable install volumes that will provide confidence prior to a final decision to Mass Manufacture;
- The proposed DCC criteria for IPV requires an installation rate of at least 50%, of the total volume of order, within the proposed three-month period;
- The final DCC Operational Criteria to mass manufacture will need to be considered based on the consultation feedback on the functional scope of IPV testing committed;
- DCC notes that one of the reasons for the IPV phase raised at the SEC Ops Group subcommittee was that new versions of PPMIDs should be tested with GBCS 4.1 before it goes live; DCC notes that these PPMIDs are still being developed and the final versions are unlikely to be available for an IPV phase. IPV will therefore be limited to the current available hardware; and
- DCC further notes that the 2G/3G service will soon be migrating to 4G. While this is the subject of engagement between DCC, DESNZ and industry, the inevitable result will be that Toshiba devices will have limited availability, the JIP Milestone decision to switch to 4G is currently on 30 June 2023. DCC is accordingly of the view that an IPV phase with Toshiba devices will have limited benefit.

DCC would like views from Energy Suppliers as to whether they are of the opinion that an IPV phase would be beneficial. DCC invites respondents to consider the cost and time implications of such a delay as set out in Sections 6.3 to 6.5 below.

IPV Q2	Do you support the addition of an IPV phase to the GBCS 4.1 plan, which will use existing CH hardware models (i.e. 2G/3G CHs) to increase confidence in GBCS 4.1 compliant Communications Hub firmware? Please set out your reasoning, which will include: • what benefits you hope to gain; • what elements you seek to prove in IPV against the scope of the release and your proposed plans based on a three-month IPV period Please note the following as part of your consideration: • GBCS 4.1 CH firmware is an update to existing CH hardware models and DCC is not introducing any new Comms Hub Hardware model. • Energy Suppliers participating in GBCS 4.1 CH FW UIT testing will be covering key customer journeys with their chosen meters/device including installation business scenarios. This activity forms a key input for Operational Acceptance for OTA Pilot deployment. • A successful OTA Pilot is already a key input to manufacturing of Comms Hub with GBCS 4.1 CH FW.

IPV Q3	If you support IPV for GBCS 4.1 CH FW, please can you detail what you intend to prove through an IPV process against scope of the release. Please provide details of your proposed plans? This will further support DCC Operations in understanding the Mass Manufacture Operational Criteria and reflect whether these need further moderation.

6.2. Comms Hub refurbishment

DCC has considered alternative options alongside the provision of an IPV phase, with Comms Hub refurbishment as an alternative option being tabled, but it is in its early stages of development and therefore needs further detailed consideration and development in parallel with this consultation phase. If Comms Hub refurbishment is possible, it would be conducted in parallel to Mass OTA activity.

- If the OTA Pilot Phase is successful, DCC would look to provide OA to refurbish Comms Hubs manufactured at GBCS 2.1 but refurbished to GBCS 4.1. DCC would require agreement from CSPs that this is an acceptable process;
- DCC would refurbish an amount (to be agreed) to GBCS 4.1 and deliver these to Energy Suppliers. DCC would require a timeline and agreement from CSPs to proceed with this option, and
- OA Criteria for Mass Manufacture would be 50% installation of the total agreed refurbishment installation volumes.

VMO2 have stated that the refurbishment facility is not possible for UIT nor for test CHs of any variant and only works on production CHs. However, they have proven experience with the refurbishment of Production CHs and have shipped some refurbished CHs to Energy Suppliers last year. However, to be able to put GBCS 4.1 on to a refurbished Comms Hub VMO2 need manufacturing OA to be granted by the DCC as a pre-requisite, consequently there is no time saved with this option.

The key benefit of this proposal to use refurbished CHs for the IPV period is it would save approximately 10-12 weeks of manufacturing time as refurbishment time is reduced to 4 weeks compared to 12-14 weeks IPV delivery estimated. The 3 months installation time would remain, followed by Mass Manufacture OA to switch to GBCS 4.1 CH FW. DCC would therefore like to sense check if this option is acceptable for Energy Suppliers.

IPV Q4	Please provide your views on whether to consider the following option instead of the proposed IPV using newly manufacture CHs with GBCS 4.1 Firmware. The following proposal being tabled as per would run in parallel to Mass OTA Deployment: • If the Pilot Phase is successful, DCC would look to provide OA to refurbish CH to GBCS 4.1 instead of mass manufacturing • DCC would refurbish an amount (to be agreed) to GBCS 4.1 and deliver these to Energy Suppliers. DCC would require a timeline and agreement from CSP to proceed with this option • OA Criteria for Mass Manufacture would be 50% installation of the total agreed refurbishment installation volumes

6.3. Cost Breakdown

DCC has engaged with manufacturers and CSPs to obtain a cost breakdown to enable Energy Suppliers to gain an understanding of the cost impact of introducing an IPV phase. The costs stated in this consultation are based on the direct costs incurred from Service Providers for delivering and IPV. The costs set out in Diagram 2 includes setup, effort required in changing the manufacturing line, labour, Comms Hubs hardware costs, and air freight. These costs are indicative costs, which DCC will continue to refine.

The indicative costs received from the CPSs is circa £700,000.

Diagram 2: IPV Phase Cost Breakdown

Comms Hub Manufacture / Variant	Indicative Cost £ DB	Indicative Cost £ SB	Indicative Cost £ all variants
Toshiba SBCH	-	£300,000 (one-off setup cost) £40,000 (CHs/Airfreight)	£500,000
Toshiba DBCH	£300,000 (one-off setup cost) £65,000	-	
WNC SBCH	-	£40,000	
WNC DBCH	£65,000	-	
EDMI SBCH	-	£100,000 (all inc.)	£200,000
EDMI DBCH & DBCH-F	£100,000 (all inc.)	-	
Total	**£530,000**	**£480,000**	**£700,000**

6.4. Considerations on Wider Cost

There are also additional, wider costs which we have not quantified, but are relevant to any decision on whether to implement IPV. DCC would welcome respondents' views on these costs.

Noting the wider impact of delay to the supply chain dates of GBCS 4.1 compatible CH FW means the number of CHs delivered with GBCS 2.1 compatible CH FW will increase and will also impact the Technical Specification Applicability Table (TSAT) dates that provides for which firmware versions can be introduced into the production environment. This will introduce additional cost to the GBCS 3.2 programme for extended support of delaying GBCS 4.1 In Supply Chain dates. This will need to be impacted if a firm decision to proceed with IPV is confirmed.

VMO2 have confirmed there are no incrementation cost impacts as TOSH has been expedited in place of WNC which can be managed under the current cover.

There will be additional upgrade costs relating to Arqiva for CRP535, this will be in the region of £7,000 to £8,000 per month or a total of £49,000 to £56,000 for the seven-month period.

6.5. Timeline Impact

The timelines for the implementation of GBCS 4.1 have been agreed as JIP milestones which are currently as set out in Diagram 3:

Diagram 3: Current JIP milestones

CH Firmware	TAG Review	OPSG Review	SEC Review	Target CPL Entry date	In-Supply Chain
TOSH GBCS 4.1	26 Apr 2023	13 Jun 2023	27 Jun 2023	14 Jul 2023	19 Feb 2024
EDMI GBCS 4.1	28 Jun 2023	08 Aug 2023	22 Aug 2023	15 Sep 2023	22 Apr 2024
WNC GBCS 4.1	30 Aug 2023	10 Oct 2023	24 Oct 2023	10 Nov 2023	14 Jun 2024

DCC has been planning and working on the basis of the Diagram 3 milestones. The addition of the IPV phase will have a significant impact on these milestones as they will all have to be delayed by at least seven months to make provision for IPV. This would have a direct impact on all Energy Suppliers as GBCS 4.1 would be delayed by this period, with current GBCS version only being available.

Slide 3 in Annex A shows the GBCS 4.1 Programme Plan as baselined and with the added IPV phase, which indicates the delay for the variants

The diagram 4 below shows the changes to the In Supply Chain dates which would have to be reflected in the JIP milestones. These dates will have to be changed in the JIP, and DCC is accordingly consulting on changing the JIP milestones to ensure that the changes to the JIP milestones are considered as part of the consultation response.

Diagram 4: Joint Industry Plan Dates with IPV Proposed at February 2023, OPSG (88_1402) Meeting

CH Firmware	TAG Review	OPSG Review	SEC Review	Target CPL Entry date	In-Supply Chain
TOSH GBCS 4.1	29 Apr 2023	13 Jun 2023	27 Jun 2023	14 Jul 2023	30 Sep 2024
EDMI GBCS 4.1	28 Jun 2023	08 Aug 2023	22 Aug 2023	15 Sep 2023	30 Oct 2024
WNC GBCS 4.1	30 Aug 2023	10 Oct 2023	24 Oct 2023	10 Nov 2023	30 Jan 2025

6.6. Available options for IPV

DCC is of the view that there are five options that the GBCS 4.1 Programme could adopt regarding whether or not to implement and IPV phase, and we have set these out below:

Options/Impact		Option 1: Do nothing / continue with current baselined plan	Option 2: IPV across all seven CH variants	Option 3: IPV with limited variants (SB only)	Option 4: IPV with limited variants (DB only)	Option 5: IPV using refurbished CHs with GBCS 4.1 FW
Description		Do not include an IPV Phase – follow the normal process of successful UIT by energy suppliers, successful OTA pilot, successful mass deployment, manufacture at GBCS 4.1 CH FW – all subject to DCC's usual Operational Acceptance criteria for each stage.	Plan an IPV phase for all seven variants of CHs	Plan an IPV phase with limited variants of CHs – SB Only (please set out your preferred combination of variants)	Plan an IPV phase with limited variants of CHs – DB Only (please set out your preferred combination of variants)	In parallel to mass OTA, DCC would organise for refurbished CHs to be delivered to Energy Suppliers, using existing warehouse stock currently on different firmware versions (please set out your preferred combination of variants)
Manufacturing time Impact		No impact to baseline plan	7 months	7 months	7 months	Approx 4 months
In Supply Chain dates	**Toshiba** **EDMI** **WNC**	19 February 2024 22 April 2024 11 June 2024	30 September 2024 30 October 2024 30 January 2025	30 September 2024 30 October 2024 30 January 2025	30 September 2024 30 October 2024 30 January 2025	Indicative (subject to CSP discussions). IPV delivery reduced to 1 month, 3 months install unchanged. 30 June 2024 30 August 2024 30 September 2024
Cost		£0	£700k	Up to £480k	Up to £530k	£ TBC (Minimal cost expected - DCC are looking at this)

Please note that the dates in Option 5 are indicative as DCC is currently in the process of developing the cost timeline as set out in Section 6.2.

Question 5 seeks views on these options. Please consider the costs and timeframes set out in Sections 6.3 to 6.5 above when considering the various options. DCC is of the view that a full IPV in option 2 will provide limited benefit as compared with options 3 and 4 but will cost a considerable amount more.

IPV Q5	Which of the following options do you prefer: **Option 1**: Do not include an IPV Phase – follow the normal process of successful UIT by energy suppliers, successful pilot, successful mass deployment, manufacture at GBCS 4.1 CH FW; **Option 2**: Plan an IPV phase for all variants of CHs; **Option 3**: Plan an IPV phase with limited variants of CHs – SB Only; **Option 4**: Plan an IPV phase with limited variants of CHs – DB Only; or **Option 5**: Consider using refurbished CH at GBCS 4.1 CH FW in line with Q4. Please provide rational for your reasoning.

IPV Q6	Do you agree that DCC should propose to extend the In Supply JIP milestone as per diagram 4 if the Initial Pallet Period goes ahead? Do you think there should be an alternate date for the JIP milestone? Please provide the rationale for your reasoning.

7. Industry Questions & Feedback

DCC has the following questions that it would like answered so that it can determine an approach to IPV and report back to the SEC Ops Group.

IPV Q1

Please can you confirm whether you will you be taking part in GBCS 4.1 CH FW UIT Testing. If yes, please provide details of:

- the variants (WNC/Toshiba/EDMI – SB / DB) you intend to test in UIT
- which of the seven customer journeys you will test against in UIT

1. Installation & Commission;
2. Change of Payment mode;
3. Change of Tariff;
4. Change of Tenancy;
5. Change of supplier;
6. Prepayment Top-up; and
7. GBCS 4.1 feature of PPMID device OTA (new for GBCS 4.1)?

IPV Q2

Do you support the addition of an IPV phase to the GBCS 4.1 plan, which will use existing CH hardware models (i.e. 2G/3G CHs) to increase confidence in GBCS 4.1 compliant Communications Hub firmware?
Please set out your reasoning, which will include:

- what benefits you hope to gain;
- what elements you seek to prove in IPV against the scope of the release and your proposed plans based on a three-month IPV period

Please note the following as part of your consideration:

- GBCS 4.1 CH firmware is an update to existing CH hardware models and DCC is not introducing any new Comms Hub Hardware model.
- Energy Suppliers participating in GBCS 4.1 CH FW UIT testing will be covering key customer journeys with their chosen meters/device installation business scenarios. This activity forms a key input for Operational Acceptance for OTA Pilot deployment.
- A successful OTA Pilot is already a key input to manufacturing of Comms Hub with GBCS 4.1 CH FW.

IPV Q3

If you support IPV for GBCS 4.1 CH FW, please can you detail what you intend to prove through an IPV process against scope of the release. Please provide details of your proposed plans?
This will further support DCC Operations in understanding the Mass Manufacture Operational Criteria and consider whether this needs further considerations.)

IPV Q4	Please provide your views on whether to consider the following option instead of the proposed IPV using newly manufacture CHs with GBCS 4.1 Firmware. The following proposal being tabled as per would run in parallel to Mass OTA Deployment: • If the Pilot Phase is successful, DCC would look to provide OA to refurbish CH to GBCS 4.1 instead of mass manufacturing; • DCC would refurbish an amount (to be agreed) to GBCS 4.1 and deliver these to Energy Suppliers. DCC would require a timeline and agreement from CSP to proceed with this option; • OA Criteria for Mass Manufacture would be 50% installation of the total agreed refurbishment installation volumes.

IPV Q5	Which of the following options do you prefer: **Option 1**: Do not include an IPV Phase – follow the normal process of successful UIT by energy suppliers, successful pilot, successful mass deployment, manufacture at GBCS 4.1 CH FW; **Option 2**: Plan an IPV phase for all variants of CHs; **Option 3**: Plan an IPV phase with limited variants of CHs – SB Only; **Option 4**: Plan an IPV phase with limited variants of CHs – DB Only; or **Option 5**: Consider using refurbished CH at GBCS 4.1 CH FW in line with Q4. Please provide rational for your reasoning.

IPV Q6	Do you agree that DCC should propose to extend the In Supply JIP milestone as per diagram 4 if the Initial Pallet Period goes ahead? Do you think there should be an alternate date for the JIP milestone? Please provide the rationale for your reasoning.

8. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views. DCC will present its view on the consultation responses at the SEC Ops meeting on 11 April 2023 and publish its consultation response.

If it is determined that the Initial Pallet phase should go ahead, DCC will approach IMF and seek to change the JIP milestones in line with the conclusion to this consultation

9. How to Respond

Please provide responses by 16:00 on 31 March 2023 to DCC at consultations@smartdcc.co.uk.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Energy Security & Net Zero and the Gas and Electricity Markets Authority (the Authority). Information provided to the

Department for Energy Security & Net Zero or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If the Department for Energy Security & Net Zero or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

Attachments

Attachment 1: Annex AIPV supporting information

Attachment 2: Response template