Energy UK Response to the Smart DCC Consultation on Communications Hub Sizing and Reduced Height Communications Hubs: North Region

12th July 2018

About Energy UK

Energy UK is the trade association for the GB energy industry with a membership of over 100 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership covers over 90% of both UK power generation and the energy supply market for UK homes. We represent the diverse nature of the UK’s energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership. Our members turn renewable energy sources as well as nuclear, gas and coal into electricity for over 27 million homes and every business in Britain. Over 730,000 people in every corner of the country rely on the sector for their jobs, with many of our members providing long-term employment as well as quality apprenticeships and training for those starting their careers. The energy industry invests £12bn annually, delivers £88bn in economic activity through its supply chain and interaction with other sectors, and pays £6bn in tax to HMT.

Introduction

This is the Energy UK response to the Smart DCC consultation on Communications Hub (CH) sizing and Reduced Height Communications Hub (RHCH) for CSP North. Energy UK recognises the effort that DCC and its Service Providers have gone through to move this CH development forward and support the work done so far given the importance to our members of having fit for purpose CHs that support the smart metering rollout. We welcome the opportunity to respond to this DCC consultation.

In section 1 of our response, we provide high-level views on the consultation questions, where appropriate, capturing overarching key points on behalf of our Energy UK members – we expect our members to provide additional detailed views in their individual responses. The response also captures in section 2 further points not covered by the consultation questions, which we believe are equally important. Our response is not confidential.

1. High-level Responses to Consultation Questions

<table>
<thead>
<tr>
<th>Q1</th>
<th>Do you agree with the proposal for a Reduced Height Communications Hub for the North Region? If not, please provide your rationale.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Energy UK agrees with the proposal for a RHCH for CSP North. The need for a RHCH has been a long-standing requirement from our members and we have previously provided analysis to BEIS and DCC supporting this.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Q2</th>
<th>Do you have any comments on the proposed changes to CHHSM for the RHCH?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Whilst DCC refers to CHHSM¹ and CHIMSM² and notes it intends to make changes to CHHSM, we would suggest that DCC ensures any overarching regulatory requirements in SEC (including SEC</td>
</tr>
</tbody>
</table>

¹ Communications Hub Handover Support Materials.
² Communications Hub Installation and Maintenance Support Materials.
Subsidiary Documents) are aligned to other DCC and CSP documents (e.g. the Train-The-Trainer material covers specific installation recommendations such as the 5cm clearance around the CH) at the earliest opportunity.

Q3 – Would you be interested in ordering a small number of RHCH post PIT for testing in UIT? If so, how many would you be interested in ordering?

Our members will respond to this question individually; however, we note that DCC needs to ensure its Order Management System is operating as it should be and the current issues experienced on its Order Form are fully resolved.

We have captured additional comments in relation to Section 2.6 (Build and Test) and Section 2.7 (Charging for a RHCH) below as these are not covered by the consultation questions.

Q4 – Please provide any additional views on the physical dimensions of the Communications Hubs in the North Region at its current size that have not been covered in questions 1 and 2.

Energy UK has no specific points to make on this question; however, our members may have detailed points to make in their individual responses given their experience of the rollout to date.

Q5 – Please provide your views on the physical dimensions of the Communications Hub in the Central and South Region.

Whilst this DCC consultation concentrates on CHs in the North Region, Energy UK and its members are disappointed that similar developments to reduce CHs sizing for the Central and South Region have not transpired. As the CH manufacturer for the North Region has now demonstrated it is physically and technically possible to reduce the size of its CHs without having a detrimental impact on CH performance and functionality, Energy UK and its members would expect CH manufacturers for the Central and South Region to follow suit.

2. Additional points not covered by the consultation questions

We have a number of comments that are not covered by DCC’s consultation questions in relation to Section 2.6 (Build and Test) of the consultation document:

a) DCC notes the timeline for delivery as between Q4 2018 and Q1 2019 after Release 2.0 is deployed. We are unclear on why the RHCH timeline is tied to the R2 delivery; we believe RHCHs should be made available for delivery as soon as the appropriate assurance / due-diligence activities have been completed by DCC as there appears to be no technical reason to tie RHCHs to R2.

b) We seek more certainty on the delivery window (currently a 6-month window between Q4 2018 and Q1 2019) as we expected this to be more concrete.

c) There is a concern that any potential delay on the R2 delivery will therefore impact the delivery of RHCHs, and especially now that DCC has marked the RAG status for the R2 testing programme as Red3.

d) DCC helpfully captures a list of the technical assurance activities to be undertaken for RHCH; however, we were under the impression that DCC has already undertaken a significant amount of these activities, so it is a surprise to see that these activities are noted as “will be undertaken” in the consultation document. In addition, given DCC’s objective of ensuring no negative impact on the SM WAN coverage performance or HAN performance, we expect DCC to be optimising the WAN and HAN performance of its CHs whenever possible to support the rollout.

e) Linked to the technical assurance activities listed by DCC, we seek clarity / confirmation that:

- The RHCH will be part of the existing testing activities in respect of the current issue on RF interference / ESME noise impact on the WAN performance.

---

3 As per the Weekly SEC Testing Report (dated 15th June 2018).
- The current CSP North CH WAN LED issue (being progressed via TBDG and SEC Panel) will not impact RHCHs, or will be resolved in time for the delivery of RHCHs to Suppliers.

- The firmware to be deployed onto RHCHs will resolve any known/existing CH defects and issues identified in E2E testing, Production, and R2 SIT and DIT in line with other CHs, especially those defects and issues marked against CSP North CHs.

f) It is unclear when test variants of RHCHs will be fully made available to Suppliers for testing.

DCC notes a limited number (up to 200) post-PIT could be made available by 31st July – we assume this is a total number to be shared across all Suppliers.

- Whilst not specifically called out in the consultation, we expect DCC to have taken this opportunity of device redesign to resolve previously raised industry concerns on the human readability of the GUIDs on current CHs (for the font and font size used). This would allow for more efficient triage of issues as more devices move from well-lit test labs to real-life conditions in customers’ homes (e.g. under stairs).

We have a number of comments that are not covered by DCC’s consultation questions in relation to Section 2.7 (Charging for a RHCH) of the consultation document:

a) There are no indicative costs provided for RHCHs; it is important DCC provides this information even if this is in draft form to inform Suppliers (such as providing an assumed/estimated cost-range based on the best available information at present), and especially as Suppliers will want to order RHCHs and test variant RHCHs as soon as they are made available to order.

b) Linked to above, for transparency, we suggest DCC provides as soon as possible:

- A view of the cost of a RHCH and a test variant RHCH to be levied on Suppliers (whilst recognising that the DCC has already noted it does not expect there to be an increase in the Fixed CH Charge as a result of introducing RHCHs). The current expectation is that the costs to be levied on Suppliers will be comparable to existing CHs and their test variants – we would not expect the RHCH cost to be significantly uplifted compared to the Standard 420 CH (e.g. for any commercial gain).

- A high-level view of the initial costs for development (including what development has been undertaken) and testing by CSP North, especially as DCC expects to recover these costs via DCC charges (in line with its Charging Methodology).

We hope the overarching key points in our responses to the questions and the additional comments above are helpful. Please let me know if we can provide any further clarity or assistance. We would also be happy to facilitate any engagement with our members should DCC see merit in this.

Yours sincerely,

Daisy Cross
Head of Smart Programme