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DP207

‘Allowing Registered Supplier Agents to Maintain Meter Firmware’

Modification Report

Version 0.1

10 May 2022



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

If you have any questions on this modification, please contact:

Mike Fenn

020 3314 1142

mike.fenn@gemserv.com

1. Summary

This proposal has been raised by Tom Woolley from SMS Plc.

Supplier Parties authorise Meter Operators (MOPs) and Meter Asset Managers (MAMs) to install and maintain Smart Meters. However, under the Smart Energy Code (SEC), MOPs and MAMs are not able to use the Data Communications Company (DCC) System to remotely manage the meters' Firmware.

Device Firmware management is integral to the health of the Smart Metering ecosystem. The Proposer believes that MOPs and MAMs are in a better position than Suppliers to facilitate this, and that enabling Suppliers to outsource these operations to their Registered Supplier Agents (RSAs) will improve the overall Smart Metering service.

2. Issue

What are the current arrangements?

MOPs and MAMs are appointed by Suppliers to manage their Devices, including remote and on-site fault resolution and processes such as Install and Commissioning procedures. They are able to become DCC Users in the User Role 'Registered Supplier Agent'. MOPs and MAMs are authorised by Suppliers to maintain the meters in the Suppliers' portfolios throughout the Device lifespan. However, they are not able to maintain the meters' Firmware versions.

What is the issue?

SEC Appendix E 'DCC User Interface Services Schedule' (UISS) and SEC Appendix AD 'DCC User Interface Specification' (DUIS) both state that only Parties with either the DCC User Role 'Import Supplier' or 'Gas Supplier' can send Service Reference Variant (SRV) 11.1 'Update Firmware' and SRV 11.3 'Activate Firmware'. Parties with the User Role 'Registered Supplier Agent' are unable to send these SRVs, and therefore unable to manage the Firmware version on Smart Metering Equipment Technical Specifications (SMETS)₂+ Devices they are registered to.

The responsibility for managing Device Firmware therefore sits solely with Supplier Parties, when it may be beneficial to outsource some of this functionality to RSAs.

Firmware management is essential for Suppliers and the wider industry, which relies on Smart Meter data for day-to-day processes and for the success of future programmes, such as Market-wide Half Hourly Settlement (MHHS) and achieving net-zero. It is also critical for asset funders, such as Meter Asset Providers (MAPs) and their investors, which rely on meters being installed and operated for many years.

What is the impact this is having?

Increases in the variety of Devices with different Firmware versions have resulted in drops in DCC System performance and rises in the removal rate of SMETS₂ Devices. Each Supplier has to

implement highly varied processes to manage the different combinations, requiring investment of time and resource which could be outsourced to RSAs.

Placing the burden of maintaining meter Firmware versions solely on Suppliers causes deficiencies in the Smart service, as there is an increased risk of Device Firmware becoming outdated. In addition to being a breach of a Supplier Party's SEC obligations, this can have a negative impact on the interoperability of Devices. This in turn increases the risk of disruption to message process pathways if Devices are not communicating as expected over the Home Area Network (HAN) or Wide Area Network (WAN). Out-of-date Firmware versions may also be more vulnerable to security breaches.

Impact on consumers

Outdated Firmware can impact the interoperability of HAN Devices such as In-Home Displays (IHDs) and Prepayment Meter Interface Devices (PPMIDs), negatively affecting consumers' access to information and prepayment functionality. The financial investment in time and resources required for Suppliers to manage Firmware versions across all their Devices may be greater than if they were able to outsource this functionality to RSAs, resulting in a higher cost to consumers for providing this service.

3. Assessment of the proposal

Observations on the issue

Areas for assessment

As part of the modification assessment, the Smart Energy Code Administrator and Secretariat (SECAS) will engage with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums.

SECAS believes the following Sub-Committees will need to input to this modification:

Sub-Committee	Input needed
OPSG	Will allowing RSAs to send SRVs 11.1 and 11.3 have an impact on other operational processes?
SMKI PMA	No input needed.
SSC	Will security audits need to be adapted to meet the expanding scope of the RSA User Role?
TABASC	Will allowing RSAs to send SRVs 11.1 and 11.3 require changes to the technical architecture?

During the Development Stage, SECAS will work with the Proposer to better understand the impacts of this issue and whether other Suppliers would benefit from this modification.

Appendix 1: Progression timetable

On 17 May 2022 SECAS will present this modification to the Change Sub-Committee (CSC) for initial comment before further developing the issue with the Proposer and the DCC.

Due to the high number of modifications which have been raised this month SECAS is recommending this modification is added to the waiting list until there is sufficient capacity to progress the Proposal.

Timetable	
Event/Action	Date
Draft Proposal raised	10 May 2022
Presented to CSC for initial comment	17 May 2022
CSC agree this Proposal is placed on the waiting list	17 May 2022

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
DCC	Data Communications Company
DUIS	DCC User Interface Specification
HAN	Home Area Network
IHD	In Home Display
MAM	Meter Asset Manager
MAP	Meter Asset Provider
MHHS	Market-wide Half Hourly Settlement
MOP	Meter Operator
OPSG	Operations Group
PPMID	Prepayment Meter Interface Device
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SRV	Service Reference Variant
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
UISS	User Interface Services Schedule
WAN	Wide Area Network