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SEC Change Sub-Committee Meeting 39_1705

17 May 2022, 10:00 – 11:15

Teleconference

SECCSC_39_1705 – Draft Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	David Kemp (DK)
Large Suppliers	Emma Johnson (EJ)
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
Electricity Network Parties	Kelly Kinsman (KK)
Other SEC Parties	Alastair Cobb (AC)

Representing	Other Participants
DCC	David Walsh (DW)
	Tom Rothery (TR) <i>(part)</i>
	Del Kang (DKa) <i>(part)</i>
	Imogen Lindsay (IL) <i>(part)</i>
	Charlotte Semp (CS) <i>(part)</i>
Ofgem	Scott McPhillimy (SM)
SECAS	Eloise Evans (EE) <i>(Meeting Secretary)</i>
	Kev Duddy (KD)
	Alison Beard (AB)
	Joe Hehir (JH)
	Mike Fenn (MF)
Other	Tom Woolley (TW) <i>(part)</i>
	Gordon Hextall (GH) <i>(part)</i>

Apologies:

Representing	CSC Member
Consumers	Ed Rees

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the Change Sub-Committee (CSC) meeting.

No comments were raised on the last meeting's minutes. The CSC **APPROVED** the minutes.

2. SEC Modification Progression

MP128A 'Gas Network Operators SMKI Requirements'

SECAS (MF) presented the CSC with a summary of Modification Proposal [MP128A 'Gas Network Operators SMKI Requirements'](#)

A CSC member (EL) asked what the ramifications could be if MP128A wasn't implemented, stating that it seemed to be a high cost on Suppliers to fix an issue for Network Operators, and that the operational impact didn't appear to justify the cost.

SECAS (MF) explained that incorrect Certificates can prevent a Network Operator from being able to communicate with the Device. The member (EL) acknowledged that it would ensure the Network Operator Certificates are correct but questioned what the impact was if they were incorrect as Gas Network Operators (GNO) gain no benefits from being DCC Users.

The Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) Chair (GH) explained that Suppliers are also affected as they are unable fulfil their obligations to place the correct GNO Certificates on Devices, noting SECAS is regularly receiving queries regarding this. They highlighted that SMKI Recovery Events are required to correct the GNO Certificates and will continue to be needed if this modification isn't implemented. As Key Custodians are required to attend SMKI Recovery events, a cost is incurred. They noted that there are currently around two million network Devices with incorrect Certificates, and that a previously run SMKI Recovery Event to correct these only managed to correct around half a million of them. Regarding costs, the SMKI PMA Chair mentioned that GNOs have been quoted in excess of £132k to go through SMKI and Repository Entry Process Testing (SREPT) to meet their SEC obligations to become DCC Users but they do not benefit from being DCC Users. They also noted that the security trust model is dependent on Devices having accurate SMKI Certificates.

A CSC member (AC) raised that a clarification as to whether this MP128A provides sufficient value will be fundamental to the Change Board's decision. The CSC agreed the decision on progressing MP128A to the Report Phase should be deferred to the June meeting, to allow time for discussion between GH, EL and AC to clarify the value and impact of MP128A.

The CSC:

- **DID NOT AGREE** that MP128A should progress to the Report Phase, considering it should remain in the Refinement Process to allow more time for clarification of its value and impact.

DP203 'Security Assurance of Device Triage Facilities'

SECAS (KD) presented the CSC with a summary of Draft Proposal [DP203 'Security Assurance of Device Triage Facilities'](#).

A CSC member (AC) asked for the Modification Report to be updated to highlight that Suppliers 'can' operate Triage Facilities, rather than that they 'may be' able to. They also suggested that the paper should be updated to clarify that Meter Asset Providers (MAPs) are not obliged to be SEC Parties, but can choose to be. They would be expected to meet all the relevant requirements should they choose to operate a Triage Facility, whether they were a SEC Party or not. The member further queried whether Triage Facilities would be able to be assured in advance of this modification being implemented. The Proposer (GH) advised that they may be able to once the legal text had been developed.

The CSC:

- **AGREED** that the issue and the impact it is having is clearly defined and understood;
- **AGREED** that DP203 should be converted to a Modification Proposal;
- **AGREED** that MP203 should be progressed to the Refinement Process; and
- **AGREED** the first package of work and the timetable for MP203.

DP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'

SECAS (KD) presented the CSC with a summary of Draft Proposal [DP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'](#).

A CSC member (AC) queried the influence of the Department for Business, Energy and Industrial Strategy (BEIS) in the urgency of this proposal. SECAS (AB) explained that although there has been a steer from BEIS, the urgency primarily comes from the pre-agreed Issue Resolution Proposal (IRP) timetables.

The CSC:

- **AGREED** further development is required to define and understand the issue

DP205 'Updating terminology to align with the NCSC'

SECAS (AB) presented the CSC with a summary of Draft Proposal [DP205 'Updating terminology to align with the NCSC'](#).

SECAS (AB) noted that there will be a DCC system impact as 'whitelist' is a flag on some messages sent from the DCC to Suppliers regarding the status of Devices. A CSC member (DD) noted that many internal documents had references to the Device status and the cascade of impacts from this change would require a lot of work; this would likely be the same for other Parties. SECAS (AB) acknowledged this and stated that there would need to be a much wider conversation around the potential impact of this modification and ways to mitigate it.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP205 should be placed on the waiting list

DP206 'Allowing Generation Licence Holders to Apply Export MPANs'

SECAS (MF) presented the CSC with a summary of Draft Proposal [DP206 'Allowing Generation Licence Holders to Apply Export MPANs'](#)

SECAS (MF) noted that a CSC member (EL) had raised a point prior to the meeting that the Generator Role isn't held in the registration systems and therefore a Party holding only a Generation Licence is unable to enter export data into settlement. As the two roles are different, the licences are also different meaning that the issue may lie in the licences. This means a SEC Modification may not be able to fix this issue. SECAS (MF) explained that as part of the Development Stage, SECAS will be looking into the wording of both licences to see what is currently possible, if there are any contradictions between what is possible and what the Proposer would like to do, and whether a SEC modification can fix the issue. If this work concludes that the solution would not require a modification, SECAS would recommend the Proposer withdraws this Draft Proposal.

A CSC member (EL) queried who will be the Supplier for the Meter Point Administration Numbers (MPANs), as a Party with only a Generation Licence cannot be the Supplier. The Proposer (TW) explained that the Distribution Network Operators (DNOs) have said that they are open to granting MPANs to Generation Licence holders but acknowledged that there were many hurdles to work through for this proposal.

The DCC (DW) noted that this proposal would likely incur large costs.

The Proposer (TW) acknowledged EL's points and explained they were already being worked on.

SECAS (MF) also noted that this proposal would likely impact other Codes, in particular the Balancing & Settlement Code (BSC), and agreed to raise this through the Cross-Code Steering Group (CCSG).

The CSC:

- **AGREED** further development is required to define and understand the issue
- **AGREED** that DP206 should be placed on the waiting list

DP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

SECAS (MF) presented the CSC with a summary of Draft Proposal [DP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#).

SECAS (MF) explained that it had raised several questions which would need to be investigated as part of this modification:

- There were concerns relating to security considerations, as the proposed changes would open up possible entry points for malicious activity.
- There was also a question about the validation of Registered Supplier Agents (RSAs) as the appropriate Parties.
- There was a query about the considerations of the percentage contribution RSAs currently make for DCC Services.
- Finally, there were questions around how many Supplier Parties would benefit from this change and how much they are currently affected by the issue.

Regarding the first point, the Proposer (TW) explained that this would be mitigated by contractual arrangements between Parties to ensure proper liability.

A CSC member (AC) queried whether manufacturers will be included. The Proposer (TW) confirmed they would if they registered as an RSA.

The Proposer (TW) asked what further development was required to understand the issue. SECAS (MF) responded that it would be important to know how many Parties are currently using third parties and how this may be better outsourced.

The Proposer (TW) suggested getting feedback from the DCC on the current Firmware estate and its performance. SECAS (MF) agreed that it would reach out to the DCC on this point.

The CSC:

- **AGREED** further development is required to define and understand the issue

3. SEC Modification Timetables

SECAS (AB) provided an update on the timetables for Modification Proposals currently in the Refinement Process and the next main programme of work for each open modification. The CSC was also updated on SECAS's proposed prioritisation for each of the new Draft Proposals, and on which modifications SECAS intended to take off the waiting list.

A CSC member (AC) asked if it would be possible to label the modifications on the prioritisation matrix within the paper to make it easier to check which each one is. SECAS (AB) suggested it could be possible to provide a hyperlink for each which would allow easy access to the modification and when hovering over it would be possible to see the modification title. The Chair agreed that this would be investigated.

The CSC:

- **APPROVED** the packages of work and the progression timetables outlined in the paper.

SECCSC 39/01: SECAS to investigate how to add the modification names on the prioritisation matrix within the timetables paper to make it easier to check which modification each is.

4. SEC Releases Update

SECAS (JH) presented an update on progress with the 2022 and 2023 SEC Releases.

June 2022 SEC Release

SECAS noted that there are six Modification Proposals in scope and approved for the June 2022 SEC Release. The CSC will be asked to give formal agreement to go live at the next meeting.

SECAS (JH) informed the CSC that [MP109 'ADT and Exit Quarantine file delivery mechanism'](#) has been removed from the scope of this release, as there is insufficient time for it to reach a decision before the cut-off date.

November 2022 SEC Release

The CSC was informed by SECAS that there are sixteen Modification Proposals currently in scope of the November 2022 SEC Release, with MP109, [MP160 'Certificate Signing Request forecasting'](#), [MP181 'Meter Asset Provider access to asset related data held by the DCC'](#), [MP203 'Security Assurance of Device Triage Facilities'](#) and [DP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'](#) having been added since the last CSC meeting. No further modifications with an impact on DCC Systems are expected to be added to the scope of this release. As there are now six months until go-live, the CSC was asked to baseline the full scope of this release.

February 2023 SEC Release

The CSC was informed by SECAS that the February 2023 SEC Release will be non DCC-System impacting. There are no modifications currently targeted for this release.

The full scope of the February 2023 SEC Release will be baselined by the CSC at the August 2022 meeting.

June 2023 SEC Release

The CSC was informed by SECAS that there are six Modification Proposals currently in scope of the June 2023 SEC Release. The scope of the June 2023 SEC Release on the DCC Systems will be baselined by the CSC next month.

November 2023 SEC Release

The CSC was informed by SECAS that the November 2023 SEC Release could be a DCC System impacting release, however no DCC System impacting modifications were currently targeted for this release.

February 2024 SEC Release

The CSC was informed by SECAS that there is one Modification Proposal currently in scope of the February 2024 SEC Release.

The CSC:

- **BASELINED** the November 2022 SEC Release Implementation Document for the non-DCC System impacting modifications
- **NOTED** the update on the other SEC Releases referenced in the paper

5. Standardised DCC Impact Assessment Costs Proposal

The DCC presented an update on the Standardised DCC Impact Assessment Costs Proposal.

The Chair (DK) raised that as the paper had been submitted late, CSC members had not had much time to process the information. They explained that there had already been a request to defer the vote until next month to allow CSC members more time to read the proposal.

A CSC member (EJ) sought clarification that Impact Assessment requests would still need to be approved by the Change Board before the DCC could proceed. The DCC (DKa) confirmed that there was no proposal to remove the Change Board approval of these requests. The DCC (CS) also explained that the DCC would estimate whether the IA would be a high, medium or low cost and then bring that estimation to SECAS for validation. This would remove the need for a final IA cost review, as the costs would have effectively been pre-agreed with SECAS.

A CSC member (EJ) queried what would happen if the forecast of upcoming modifications was wrong. The DCC (CS) responded that there would be regular reviews to ensure the forecast remains correct.

A CSC member (EJ) asked what the DCC was asking permission for. The DCC (CS) explained that it was seeking permission to run a six-month pilot of the proposal. The member raised a query regarding the potential that some modifications involved in the trial may have already had a Preliminary Assessment, and that the full Impact Assessment often doesn't occur for some time after the Preliminary Assessment has been completed. The Chair noted that this is often due to interim governance steps, such as Working Group scrutiny and industry consultation, which won't change, meaning it is possible that no Preliminary Assessments performed during the trial period using this new approach would advance to full Impact Assessment in this time.

The DCC agreed to come back to the next CSC meeting in June with further details on the proposed process and trial period.

The CSC:

- **DEFERRED** its decision on proceeding with the DCC's proposed pilot to allow members more time to read through the proposal.

6. Any Other Business (AOB)

There was no further business, and the Chair closed the meeting.

Next Meeting: 21 June 2022