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SEC Change Sub-Committee Meeting 40_2106

21 June 2022, 10:00 – 12:45

Teleconference

SECCSC_40_2106 – Final 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)
	Beth Davey (BD)

Representing	Other Participants
DCC	David Walsh (DW)
	Del Kang (DKa)
	Imogen Lindsay (IL) <i>(part)</i>
	Stuart Sharman (SS) <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)
	Liz Woods (LW)
	Khaleda Hussain (KH) <i>(part)</i>

Representing	Other Participants
	James Hosen (JHo) <i>(part)</i>
	Joey Manners (JM) <i>(part)</i>
Other	Gemma Slaney (GS) <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 as written.

2. Actions Outstanding

Action Reference	Action
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.
For the June timetables paper hyperlinks have been added onto the matrix so hovering over the number will give the title of the modification and clicking on the link will take you to the modification's webpage Status: CLOSED	

3. SEC Modification Progression

MP096 'DNO Power Outage Alerts'

SECAS (DK) presented the CSC with a summary of Modification Proposal [MP096 'DNO Power Outage Alerts'](#).

A Distribution Network Operator (DNO) attendee (GS) noted that Suppliers would be indirectly affected as they receive the AD1 Alerts and that this should be reflected in the Modification Report.

The Ofgem representative (SM) asked when this modification was expected to progress for a decision from Ofgem. The CSC Chair (DK) stated it should reach Ofgem by the end of July, following the July Change Board meeting.

The CSC:

- **AGREED** that MP096 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP096 should be progressed as an Authority Determined Modification.

MP109 'ADT and Exit Quarantine file delivery mechanism'

SECAS (KH) presented the CSC with a summary of Modification Proposal [MP109 'ADT and Exit Quarantine file delivery mechanism'](#).

The CSC had no comments on this modification.

The CSC:

- **AGREED** that MP109 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP109 should be progressed as a Self-Governance Modification.

MP128A 'Gas Network Operators SMKI Requirements'

SECAS (MF) presented the CSC with a summary of Modification Proposal [MP128A 'Gas Network Operators SMKI Requirements'](#), highlighting that, as a result of discussions between a CSC member (EL) and the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) Chair (GH), the modification was now a text-only change rather than a system change.

SECAS (MF) noted that the Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair had advised that as no Gas Network Operators (GNOs) use DCC systems, the Originator Counter would likely be a low number, and so considered there would be a low risk that the request to place a new Certificate on the Device would fail.

A CSC member (AC) questioned whether the GNO attempting to place a new Organisation Certificate on a Device will have to guess the Originator Counter and whether there would be an issue if a GNO comes up with a number that is too high. SECAS (MF) acknowledged that there is no guarantee that a future GNO will know what the Originator Counter was, but that as GNOs can only send one Critical Command (SRV 6.15.1) the Originator Counter would almost always be a very low number that could be exceeded by a 'best guess'. The member (AC) suggested there should be some guidance for GNOs on how this will operate and proposed the guidance be included in the DCC Guidance document which is released periodically. The DCC (DW) confirmed this could be produced.

SECCSC 40/01: SECAS and the DCC to work on producing guidance for the GNOs regarding the planned changes under MP128A.

The CSC:

- **AGREED** that MP128A should be progressed to the Report Phase;
- **APPROVED** the Modification Report;

- **APPROVED** the implementation approach; and
- **AGREED** that MP128A should be progressed as a Self-Governance Modification.

MP160 'Certificate Signing Request forecasting'

SECAS (LW) presented the CSC with a summary of Modification Proposal [MP160 'Certificate Signing Request forecasting'](#).

A CSC member (DD) asked for clarification on what a User would need to do if it expected to be sending a significantly higher volume of Certificate Signing Requests (CSR) than expected. SECAS (LW) explained that the User would simply need to email the DCC to inform it and that the DCC would communicate if it needed additional information. However, the DCC expects that it would be unlikely more information would be required.

The CSC:

- **AGREED** that MP160 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP160 should be progressed as a Self-Governance Modification.

MP162 'SEC changes required to deliver MHHS'

SECAS (DK) presented the CSC with a summary of Modification Proposal [MP162 'SEC changes required to deliver MHHS'](#). SECAS (DK) also noted that the SEC Panel had decided that Meter Data Retrievers (MDRs) will not be required to undertake a privacy assessment and that the Modification Report would be updated to reflect this. DK confirmed that there were some views MP162 would be detrimental under SEC Objective (d)¹ due to the distribution of the costs incurred by this modification.

A CSC member (EL) questioned whether moving to the Report Phase would allow for a number of outstanding issues with the modification to be resolved, in particular the issues around costs. The member also noted that there is some confusion within the industry as to what the data collected by the MDRs can be used for and whether they may wish to use the data for additional purposes from the original intent. SECAS (DK) explained that the MDRs are expected to collate data for settlement and that there is nothing confirmed to suggest they would be allowed to use the data for any other purposes if collected in the capacity of an MDR.

The member noted some discomfort with progressing the modification, considering this would be a high cost for Suppliers to pay in order to enable a third-party to perform a function that Suppliers could already do. SECAS (DK) noted that the SEC Panel and Board are looking into how costs are allocated and there may be changes upcoming, acknowledging that the current cost allocation under the SEC is not ideal for modifications such as MP162.

The member questioned why the modification was being progressed when it still had a number of issues which would likely cause it to be rejected by Parties. SECAS (DK) acknowledged that there are some outstanding questions around the modification, but that the Modification Report set out how

¹ Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

these would be subsequently actioned. The remaining issues are too large to be resolved under MP162 in time to meet the wider market-wide half-hourly settlement (MHHS) timetable. SECAS highlighted that this modification would progress to the Change Board, which could recommend the Authority reject it if it felt it needed more work. The Authority could then assess the concerns and any outstanding issues as part of its determination and could opt to return the modification for further review if it deemed it necessary.

Another CSC member (DD) agreed that it was hard to progress the modification when there were still issues outstanding and the solution wasn't finalised, also noting that a lot of Parties would need to be consulted. SECAS (DK) advised that there had been attempts to interact with the smaller Parties through various forums, but that despite this there had been no comments received from Small Suppliers to any of the consultations to date. The member also acknowledged that not progressing the modification would result in it going back to the Working Group to have the same discussions and that the solution does meet the requirements for it to be progressed.

A CSC member (EJ) noted a lot of concern around this modification and stated a reluctance to progress this to the Report Phase. They queried whether preventing MP162 from progressing may give Parties a stronger voice in solving the issues linked to it. Another member (DD) queried whether remaining in the Refinement Process would produce any benefit, suggesting that all that needed refining on the modification had already been done. A further member (EL) considered that if the outstanding issues couldn't be resolved once MP162 moved to the Report Phase, then it shouldn't be progressed.

The Ofgem representative (SM) acknowledged that other Ofgem representatives were better positioned to respond to questions around MHHS, and that they would be attending the Change Board meeting in July. The Ofgem representative noted that it didn't appear that the issues would be fixed if the modification was held back.

SECAS (DK) advised that the MHHS Design Advisory Group (DAG) is looking into the questions around the Target Response Times (TRT), but that the Programme had previously provided the steer in December 2021 that MP162 should progress under the current TRTs while this consideration was taking place. If the TRTs needed changing then a separate modification would be progressed to action this. SECAS (DK) also noted that the cost allocation review could take a year or more and that waiting for it to be complete before progressing MP162 would have a huge knock-on effect on the MHHS timetable. Delaying MP162 could also adversely impact the Data Service Provider (DSP) re-procurement timetable.

A CSC member (EL) noted that the distribution of the costs could result in an uneven playing field but acknowledged that setting up the MDR role through the DCC makes sense and should be progressed. However, they raised that progressing it may just result in pushing it forward for someone else to deal with the issues.

A CSC member (EJ) asked if the CSC needed to know what the DAG decided before moving forwards. SECAS (DK) explained that waiting for its decision would cause further delays and that the initial understanding with the DCC is that introducing extra capacity for shorter TRTs was not expected to result in higher overall costs if progressed separately compared to doing everything under one modification.

The CSC Chair (DK) noted all of the discussions and the issues raised, but also highlighted that MP162 is focussed on the MDR User role, while other wider changes linked to delivering MHHS will come under separate modifications.

A CSC member (EL) agreed to progress the modification to Report Phase, but noted that it would be a high cost for Suppliers, considered that the modification was being pushed forwards to meet deadlines, and felt that it wasn't essential for MHHS.

Another member (DD) noted that simply looking at the paper and ignoring the wider problems, the decision had to be to progress MP162 to Report Phase; however the wider issues will appear again as the modification continues to progress. SECAS (DK) noted that leaving MP162 in the Refinement Process would lead to further delays and likely wouldn't solve any of the outstanding issues. The member agreed that the issues wouldn't be resolved by remaining in the Refinement Process and therefore the modification should be progressed.

The CSC Chair (DK) asked the other CSC members if they had any comments and if they approved the recommendations. All agreed with what had been discussed and voted to progress MP162 to the Report Phase, noting the outstanding questions around the costs and the level playing field principle, but considering that there is no further refinement that can be done to the solution.

The CSC reluctantly:

- **AGREED** that MP162 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP162 should be progressed as an Authority determined Modification.

MP181 'Meter Asset Provider access to asset related data held by the DCC'

SECAS (KD) presented the CSC with a summary of Modification Proposal [MP181 'Meter Asset Provider access to asset related data held by the DCC'](#).

A CSC member (AC) questioned why the specific costs of each report was on the slide, given that the CSC was not voting on the pricing as the modification is simply an enabling change and the costs are separate to this. SECAS (KD) explained it was just there to be noted. AC suggested the costs should be separated from the modification to avoid getting into wider debates about the costs. The DCC (DW) agreed that the specific price was not relevant to the CSC discussion. SECAS (KD) noted the comments.

The CSC:

- **AGREED** that MP181 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP181 should be progressed as a Self-Governance Modification.

MP186 'Section D Review (2020): further enhancements'

SECAS (JH) presented the CSC with a summary of Modification Proposal [MP186 'Section D Review \(2020\): further enhancements'](#).

The CSC had no comments on this modification.

The CSC:

- **AGREED** that MP186 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP186 should be progressed as an Authority Determined Modification.

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

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

A CSC member (AC) queried whether prioritising this modification had caused other modifications that the CSC may deem more urgent to be delayed. SECAS (AB) explained that although Category 3 Issue Resolution Proposals (IRPs) require time and effort from SECAS, they don't have a system impact, and therefore don't require DCC Impact Assessments. Therefore, they are less resource-intensive than other modifications. In addition, there is an IRP schedule in place, and keeping to this ensures that SECAS can continue processing them in an appropriate timescale.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood;
- **AGREED** that DP204 should be converted to a Modification Proposal;
- **AGREED** that MP204 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP204 should be progressed as a Self-Governance Modification.

DP209 'Lifetime CPA Certificates'

SECAS (KD) presented the CSC with a summary of Modification Proposal [DP209 'Lifetime CPA Certificates'](#).

A CSC member (AC) queried why it hadn't been included that Device Manufacturers may incur a cost. SECAS (AB) explained this was because it was expected to be cheaper for them as they wouldn't need to perform a recertification, only a renewal. The member highlighted that it was always necessary to do a recertification to renew a Device, but the paper didn't make it clear that the Party which has a Certificate expiring will have to perform a recertification. SECAS (JHo) agreed with the member, explaining that currently when a Commercial Product Assurance (CPA) Certificate expires, the new Certificate has to go into the Central Products List (CPL) as a new entry. The planned changes would allow for Devices to remain on the CPL as a single entry with a renewable Certificate. The Modification Report will be updated to clearly reflect this.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood;

- **AGREED** that DP209 should be converted to a Modification Proposal;
- **AGREED** that MP209 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that MP209 should be progressed as a Self-Governance Modification.

SECCSC 40/02: SECAS (KD) to update Modification Report to clarify that Device Manufacturers would still need to carry out recertification for Devices with renewable Certificates.

DP189 'Party Obligations for Communications Hub Orders'

SECAS (MF) presented the CSC with a summary of Draft Proposal [DP189 'Party Obligations for Communications Hub Orders'](#).

The CSC had no comments on this modification.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood;
- **AGREED** that DP189 should be converted to a Modification Proposal;
- **AGREED** that MP189 should be progressed to the Refinement Process; and
- **AGREED** the first package of work and the timetable for MP189.

DP208 'Northbound Prioritisation of N56 Alerts'

SECAS (MF) presented the CSC with a summary of Modification Proposal [DP208 'Northbound Prioritisation of N56 Alerts'](#).

A CSC member (AC) queried whether there should be an attempt to quantify how often the issue occurs. The Proposer (EL) explained that the DCC does not currently track the number of incidents. The DCC (DW) noted that the Operations Group (OPSG) has asked for some work to be done to try to quantify this issue.

Another member (DD) asked for it to be clarified that this issue only impacts Smart Metering Equipment Technical Specification (SMETS) 1 top ups, and also queried whether there may be reasons this occurs other than the M56 Alert getting stuck. The Proposer acknowledged there were other issues that could cause this, but that this one could be solved with this modification.

The CSC Chair (DK) acknowledged the comments from AC about quantifying the issue and requested it be highlighted in the Modification Report so it forms part of the assessment on the benefits case.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood;
- **AGREED** that DP208 should be converted to a Modification Proposal;
- **AGREED** that MP208 should be progressed to the Refinement Process; and

- **AGREED** the first package of work and the timetable for MP208.

4. 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:

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

5. SEC Releases Update

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

November 2022 SEC Release

The CSC was informed that there are sixteen Modification Proposals currently in scope of the November 2022 SEC Release. No further modifications with an impact on DCC Systems are expected to be added to the scope of this release.

February 2023 SEC Release

The CSC was informed 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 in the August meeting.

June 2023 SEC Release

The CSC was informed that there are five Modification Proposals currently in scope of the June 2023 SEC Release. Since the May CSC meeting, [MP170 'Firmware updates to Point to Point Alt HAN Devices'](#) has been removed from the scope of this release as it will not make the cut-off date in time. SECAS is exploring alternative implementation approaches. In addition, given the changes to the proposed solution, [MP128A 'Gas Network Operators SMKI Requirements'](#) will no longer have an impact on DCC systems. No further modifications with an impact on DCC Systems are expected to be added to the scope of this release.

The CSC was asked and agreed to baseline the scope of the June 2023 SEC Release on the DCC Systems .

November 2023 SEC Release

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

The CSC:

- **BASELINED** the June 2023 SEC Release Implementation Document for the DCC System impacting modifications; and
- **NOTED** the update on the other SEC Releases referenced in the paper.

6. Approval to implement the June 2022 SEC Release

SECAS (JH) presented provided an update on progress against the acceptance criteria in the Release Implementation Document (RID). It noted that the OPSG has reviewed the operational acceptance criteria, and the Testing Advisory Group (TAG) has reviewed the testing acceptance criteria. Both groups have recommended the CSC approves this SEC Release to go live.

SECAS noted the risk that several Users had still not confirmed their uptake for signing Extensible Markup Language (XML) format Service Requests and Signed Pre-Commands, with a validation check being implemented in the release via [MP104 'Security Improvements'](#). SECAS noted the DCC has concluded the risk should not impact the go-live of the release as Users not using the XML format Service Requests would not have an impact on the DCC's service or Users who are using XML format Service Requests.

The CSC:

- **NOTED** the views and recommendations of the OPSG and the TAG; and
- **AGREED** that the June 2022 SEC Release can be set live on 30 June 2022.

7. Standardised DCC Impact Assessment Costs Proposal

The DCC (SS) presented an update on the Standardised DCC Impact Assessment (IA) Costs Proposal.

A CSC member (DD) asked when the DCC aimed to roll this out to its other Service Providers. The DCC (DKa) suggested Q1 2023. The CSC Chair (DK) noted that costs for 2022-23 would need to be agreed and proposed reviewing the trial after six months and getting feedback for the December CSC meeting. The DCC agreed to bring an update to the December CSC meeting.

The member noted that half a year may not be long enough for a proof of concept. The DCC (DKa) acknowledged that may be the case, in which case there would be a review of how to proceed in December. The DCC (DW) agreed that extending the trial period may be necessary as there are currently not many DSP-impacting modifications expected to undergo an Impact Assessment in the coming months.

The CSC:

- **AGREED** for the DCC to proceed with a proof of concept for standardised Impact Assessment costs using the approach outlined.

8. Any Other Business (AOB)

The CSC Chair (DK) asked that members make sure to reply to the email containing the meeting's paper to say whether they would be attending each meeting.

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

Next Meeting: 19 July 2022