SEC Change Sub-Committee Meeting 46_2012

20 December 2022, 10:00 – 11:50

Teleconference

SECCSC_46_2012 – Final Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	David Kemp (DKe)
Large Suppliers	Rochelle Harrison (RH) *(alternate for Emma Johnson)*
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
Electricity Network Parties	Kelly Kinsman (KK)
Other SEC Parties	Alastair Cobb (AC) *(part meeting)*

Representing	Attendee
DCC	Joe Hehir (JH)
	David Walsh (DW)
	Del Kang (DKa)
Ofgem	Jamie Flaherty (JF)
	Scott McPhillimy (SMcP)
Security Sub-Committee	Gordon Hextall (GH)
SECAS	Rachel Black (RB) *(Meeting Secretary)*
	Ali Beard (AB)
	Bradley Baker (BB)
	Mike Fenn (MF)
	Ben Giblin (BG) *(part meeting)*

Apologies:

Representing	CSC Member
Large Suppliers	Emma Johnson
Other SEC Parties	Beth Davey

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
40/01	SECAS and the DCC to work on producing guidance for the Gas Network Operators (GNOs) regarding the planned changes under MP128A.
SECAS (MF) advised that SECAS has provided the DCC with the revised drafting and is awaiting a response. The DCC (DW) advised that there is no further update on this. **Status**: OPEN	

3. SEC Modification Progression

MP183 'Post Commissioning Obligations Reporting'

SECAS (MF) presented the CSC with a summary of MP183 'Post Commissioning Obligations Reporting', recommending it be progressed to the Report Phase.

SECAS (MF) noted that the DCC had raised concerns that it may not be able to produce some of the reporting related to this modification by February 2023 and asked if the modification's implementation should be delayed to clarify this. The Security Sub-Committee (SSC) Chair (GH) noted that this modification is needed to improve the accuracy of DCC reporting. They advised that the DCC has been producing figures that this modification is concerned with for the past few months. They therefore questioned why the DCC needs anything to be changed when it is already carrying out the change in question. SECAS (MF) acknowledged this and advised that they had been speaking with members of the DCC delivery team about the potential of splitting the change into two parts. The first part concerns improving the accuracy of reporting by removing the successful execution of specific Service Reference Variants (SRVs) as a criterion for 'pass or fail' of Post Commissioning Obligations. The second part concerns making improvements to reporting to show the in-life Certificate health of Devices, so Suppliers can be aware of the Device's Certificate status and what they are required to do. They proposed that the modification could progress to the Report Phase with a caveat on the implementation date.

The Chair asked the CSC if the modification should be sent forward now as recommended, or if it should be deferred to next month while clarity on the DCC's reporting was obtained. The Chair noted that if the CSC decided on the latter, the modification would not make the February 2023 SEC Release. SECAS (MF) highlighted that the legal text changes will only remove the successful execution of specific SRVs as a criterion for 'pass or fail', and that they are not mandating additional categories to reporting. They confirmed that the legal text could therefore be introduced ahead of the DCC changing its reporting without causing the DCC to be non-compliant in the meantime.

A member (EL) considered that the modification should be moved forward to ensure the obligation is in place, noting the DCC reporting highlighted is not itself mandated by the legal text. Another member (RH) agreed with this point. A further member (DD) noted that deferring the modification would not achieve much, and agreed it be progressed to Report Phase.

The CSC:

- **AGREED** that MP183 should be progressed to the Report Phase
- **APPROVED** the updated Modification Report
- **APPROVED** the updated implementation approach
- **AGREED** that MP183 should be progressed as a Self-Governance Modification

MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set'

SECAS (BB) presented the CSC with a summary of MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set', recommending the decision be deferred until the next meeting.

SECAS (BB) advised that they had received comments in the Refinement Consultation in relation to the legal text. They have been working on updates in response to this and are awaiting input from the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) Chair and the SEC Lawyer. The Chair proposed that the CSC wait until this has been completed before approving the Modification Report to proceed to the Report Phase, and defer this item to next month. An ad-hoc implementation date could be considered to enable these changes to be implemented as soon as possible. This would allow time to ensure that everything is accurate before the modification is consulted and decided upon. CSC members agreed with this approach.

The CSC:

- **DEFERRED** its decision on MP198 to next month

DP220 'MMC Changes resulting from GBCS v4.1 Device Testing'

SECAS (MF) presented the CSC with a summary of DP220 'MMC Changes resulting from GBCS v4.1 Device Testing', recommending it be converted to a Modification Proposal and progressed directly to the Report Phase.

A member (EL) asked why there was an error in the Message Mapping Catalogue (MMC). SECAS (MF) advised that the error had been missed during the reviews of the relevant changes. The member considered that the DCC is responsible for the accuracy of the MMC and asked how they can prevent this error from occurring again. They expressed concern as the industry would have to pay to resolve the mistakes. SECAS (MF) advised that the modification is a text-only change and the DCC Parse & Correlate software update would have no cost to industry as it is resolving a DCC defect.

The member (EL) asked if a modification was required to fix the issue. The Chair advised that a modification is required to resolve this issue as it is the only mechanism under the SEC to do so. The Chair also advised that as the previous modification is closed, its legal text cannot be changed, so a new modification is required to make subsequent changes to the legal text. The Chair noted that SECAS will investigate this further to see what lessons can be learned.

SECAS (AB) highlighted that there are no costs associated with this modification, as the DCC will resolve the issue without charging anything. They also noted that the Technical Specification documents are large and complex, and despite them being reviewed extensively some items are occasionally missed, and some errors don't become apparent until the DCC begins its testing.

ACTION 46/01: SECAS to review and present any lessons learnt for ensuring that errors and omissions in legal text are identified before a modification is decided upon

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP220 should be converted to a Modification Proposal
- **AGREED** that MP220 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP220 should be progressed as a Self-Governance Modification

MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date'

SECAS (BB) presented the CSC with a summary of MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date', recommending it be progressed to the Report Phase.

A member (DD) asked the confidence that there will only be a tiny number of these Communications Hubs left uninstalled by April, noting three months is not a long time. SECAS (AB) advised that when this modification was discussed with the Technical Architecture and Business Architecture Sub-Committee (TABASC) in October 2022, the DCC had estimated there to be 200,000 remaining. The TABASC had estimated that 100,000 would be installed by the end of December. It was anticipated that another three to four months would then be needed to complete the task, so extending the Installation End Date by three months would encourage old stock to be installed before the new stock

The CSC:

- **AGREED** that MP221 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP221 should be progressed as a Self-Governance Modification

DP219 'Accessing Consumption Data on behalf of SEC Parties'

SECAS (BG) presented the CSC with a summary of DP219 'Accessing Consumption Data on behalf of SEC Parties', recommending it be converted to a Modification Proposal and progressed to the Refinement Process.

SECAS (BG) provided a statement from the DCC about the costs for DP219. The DCC had stated that there would be no costs for this modification, under the assumption the Other User retrieves the information on behalf of the employing Party for a set period, and therefore the employing Party should not be requesting the same data during this period. However, if the data is retrieved twice or more, then this is an increase in network traffic which has cost consequences.

SECAS (BG) also informed the CSC of figures from the Operations Group (OPSG) that Other Users make up less than 10% of traffic across the DCC System, but that traffic has doubled in the last three months. A member (EL) queried this statement, as they understood the last update the OPSG received was that they made up 50% of the traffic. Another member (RH) believed that this was related to On-Demand requests rather than all Service Requests but noted that a lot of Other Users were being contracted directly by customers and so were retrieving data for their own services. The Chair considered that this modification is likely to impact on traffic volumes and agreed that this needs to be assessed as part of the Refinement Process.

The Chair asked members if the issue is clearly defined and if the impacts it is creating are fully understood. A member (DD) considered that the issue is clear, but there is a question around the traffic of the Other Users. The Chair acknowledged this and advised concerns regarding increasing traffic across the DCC System would be compared with the size of the business problem as the modification goes through the Refinement Process. A member (EL) advised that this had met the requirements of the assessment of the issue but considered that more could be done to identify the scale of the issue, as they believed SECAS findings were lower than they should be. The other members agreed with these views.

SECAS (BG) advised that Ofgem has stated that this will be an Authority-Determined Modification.

Two members (DD and EL) noted this modification could re-open questions regarding capacity and who pays for modifications. Another member (AC) was concerned over the risk of scope creep, and urged the modification be kept within the scope set out in the report. The Chair noted that the DCC is expected to initiate work to holistically review its capacity, and the impacts arising from this modification would need to be factored into that work. The DCC (DKa) stated that the DCC expects to raise the holistic traffic management piece in January.

SECAS (AB) noted that the proposed timetable would be altered given the discussion points raised at the meeting. The Chair proposed that this modification be progressed to the Refinement Process and that the CSC be provided with a further update on progress in February, by which time the DCC would have more information about traffic management. The CSC agreed with this approach.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP219 should be converted to a Modification Proposal
- **AGREED** that MP219 should be progressed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP219

DP222 'CPL submission efficiency improvements'

SECAS (BB) presented the CSC with a summary of new Draft Proposal DP222 'CPL submission efficiency improvements', recommending it be converted to a Modification Proposal and be progressed to the Refinement Process.

A member (RH) asked why Suppliers were originally responsible for the Central Products List (CPL) entries. Another member (AC) advised that the original drafting had been prepared at a time when Manufacturers were not seen as SEC Parties, giving rise to concerns that some manufacturers may circumvent Commercial Product Assurance (CPA). However, this process has been shown to be much more robust than expected. They also noted this modification is only seeking to help get firmware versions onto the CPL and would not mandate Suppliers to then use those firmware versions.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP222 should be converted to a Modification Proposal
- **AGREED** that MP222 should be progressed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP222

4. SEC Modification Timetables

SECAS (AB) provided an update on the timetables for Modification Proposals.

SECAS (AB) advised the CSC that one modification, MP122B 'Operational Metrics – Part 2', underwent final vote in the last Change Board meeting, and three more modifications were due to be voted on this month. They advised that there had been no new Draft Proposals raised this month, and one modification, MP152 'Consumption on Smart Polyphase Electricity Meters' had been withdrawn. They also made the CSC aware that SECAS is currently working on eleven further potential Draft Proposals, which are likely to be raised in the new year. SECAS also recommended that one modification on the waiting list, MP214 'Clarification of Acceptable DCC User IDs for Import and Export Suppliers', be reactivated as it can be quickly progressed to decision.

The CSC:

- **AGREED** to reactivate MP214
- **APPROVED** the packages of work and the progression timetables outlined

5. SEC Releases Update

SECAS (MF) presented an update on progress with the upcoming SEC Releases.

A member (RH) noted that the June 2023 SEC Release is due to be implemented on 29 June 2023, and a potential change in the price cap could go live on 1 July 2023, which will impact the DCC Systems as Suppliers send down the price changes to Devices. The DCC (DKa) advised that they will speak with other DCC members to see how much of an impact this will have on the DCC Systems and provide an update next month. The Chair noted that if the release date needed to change, the CSC would need to write to the Authority to request this.

ACTION 46/02: The DCC to inform the CSC if it considers implementing the June 2023 SEC Release on 29 June 2023 as planned could impact on implementing any subsequent price changes effective from 1 July 2023

A member (AC) expressed confusion over what the red-amber-green (RAG) status in the paper was indicating. The Chair advised that this was intended to provide a measure of how likely a modification is to make the targeted release date. The Chair advised that SECAS (MF) would discuss the RAG status with the member offline to help provide further clarity and take on any feedback around this.

ACTION 46/03: SECAS to review the RAG status used in the SEC Release Updates with AC and inform the CSC of any changes arising from this

The CSC:

- **AGREED** to baseline the full scope of the June 2023 SEC Release
- **NOTED** the updates on the other SEC Releases referenced

6. Review of the DCC's standardised IA costs trial

The DCC (DKa) talked the CSC members through the latest updates of the DCC's standardised Impact Assessment costs trial. The DCC noted that no suitable modifications had arisen that the approach could be trialled against, and that this would be trialled in 2023 when suitable modifications arose.

The CSC had no comments.

The CSC:

- **NOTED** the update provided by the DCC on its approach to standardising DCC Impact Assessment costs

7. Any other business (AOB)

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

Next Meeting: 17 January 2023