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Paper Reference:	CSC_57_2111_04
Action:	For Decision

SEC Modification timetables – November 2023

1. Purpose

This paper provides an update on Modification Proposals and Draft Proposals which SECAS is currently working on. The paper presents updates on modifications which are ranked as 'high' or 'very high' on the prioritisation scoring matrix. It also notes any changes to Opine dates which have previously been agreed by the Change Sub-Committee (CSC) and the reasoning why the date has been altered. This paper also provides updates on modifications which are currently on hold.

This paper also presents this month's new Draft Proposals and their prioritisation scoring. Details are also included about Anticipated Modifications which SECAS seeks the CSC's early view on before potentially becoming Draft Proposals.

SECAS also provides selected updates on modifications which are not included in other parts of this paper but where a notable development has taken place since the last CSC meeting.

2. Monthly summary

The table below summarises key activities from the last month:

Action	Number	Modifications
Underwent final vote at Change Board on 25 October 2023	1	MP243
Scheduled for vote at Change Board on 22 November 2023	1	MP251
New Draft Proposals raised	1	DP255
Withdrawn Proposals	2	MP217, DP232
Anticipated Modifications being assessed	9	
Live Impact Assessments	1	MP223
Modifications placed on hold	3	MP085B, MP165, MP234

3. New Draft Proposal prioritisation

We have scored the new Draft Proposals raised this month against the Prioritisation Matrix, and a summary of our assessment for each is below. The scoring for each Draft Proposal and the current Prioritisation Matrix can be found in Appendix A.

Draft Proposal	Priority	Rationale
DP255 'WAN issues during Smart Meter installations'	LOW	This Draft Proposal will assist Suppliers and DCC in being able to see where Devices are working correctly. This could also assist in helping determine which Consumers need further appointments to fix the issue. There are no legal and security benefits hence why this is a low priority modification.

4. Updates on HIGH and VERY HIGH PRIORITY modifications

These are the modifications are ranked as high or very high on the Prioritisation Matrix.

Modification	Priority	Update
MP242 'Change to Operational Metrics to measure on success'	VERY HIGH	The Refinement Consultation is open until 15 November 2023. SECAS will assess the responses to the consultation before requesting the DCC Impact Assessment from Change Board on 22 November 2023.
MP251 'Transfer of Secret Key Material'	VERY HIGH	SECAS received three responses to the Modification Report Consultation. All respondents were supportive of the modification, noting their belief it better facilitates SEC objective (f) ¹ . This will undergo a Change Board vote 22 November 2023.
MP169 'Managing SEC obligations and the Consumers Right to refuse a smart meter'	HIGH	SECAS presented this modification to the Working Group, noting the second iteration of the Preliminary Assessment which showed costs of between £351,000 and £750,000. Members discussed issues with the SRVs in the scope of the modification, unintended consequences of implementing the modification and the need to engage with Citizens Advice and the Ombudsman. Members did not believe the modification was sufficiently developed to request the Impact Assessment. SECAS is working with the Proposer to resolve these issues before returning to the Working Group.
DP218 'Review of the SEC Charging Methodology'	HIGH	No change from the last update: The DCC has provided the first batch of data requested by Working Group members on 12 July 2023. SECAS has reviewed the information with DCC and agreed that whilst it provides a breakdown of DCC costs, there is not sufficient new information to hold another ad-hoc Working Group meeting in September. Therefore, the data will be circulated to interested Parties to review and provide feedback. Further data has been requested from the DCC which is due at the end of 2023. Once SECAS has received this information we will determine whether it is appropriate to hold another Working Group meeting.
MP224 'SEC Performance Assurance Framework'	HIGH	SECAS presented this modification to the October Working Group. Members considered that the modification needed more detailed documents rather than agreeing with the intent and then allowing the Performance Assurance Board to develop the details. They requested this work be carried out before

¹ to ensure the protection of Data and the security of Data and Systems in the operation of this Code.

Modification	Priority	Update
		proceeding to the Report Phase. SECAS will gain views from the Proposer and Panel to determine the next steps.
MP230 'Review the SLA for delivery and completion for SMETS1 firmware'	HIGH	The Refinement Consultation is currently open until 22 November 2023. SECAS will then present this modification to the December Working Group meeting.
MP231 'Firmware Upgrade Pathways'	HIGH	At the September Working Group members were broadly supportive of this modification but raised questions about liability and details regarding non-disclosure agreements. SECAS has discussed these issues with the relevant Manufacturers and will provide revised legal text to address these concerns.
DP252 'Amending the process for Communications Hub returns'	HIGH	This Draft Proposal will remain in the Development Stage for further investigation to take place. SECAS will develop the issue and business requirements with the Proposer in late November before presenting this Draft Proposal to the OPSG and Working Group.

5. Changes to Report Phase dates

This section contains information modifications which the CSC has agreed the timetable for however the date that the modification will return to the CSC has changed, noting the reasons for the change and whether this will impact on the targeted release date.

Modification	Reason for alteration
MP094 'Supporting prepayment customers in no SMWAN scenarios'	SECAS has received the Design Review from the DCC which showed that it would be possible to complete a Preliminary Assessment on a UTRN solution for SMETS1 Devices. A previous modification, SECMP0031 sought to expand UTRN capability but was rejected by the Security Sub-Committee (SSC) in 2016. As there have been changes to the technological landscape since then, SECAS will discuss the possibility of a UTRN solution with the SSC. This has changed the Report Phase date from March 2024 to April 2024.
MP169 'Managing SEC Obligations and the Consumers right to refuse a Smart Meter'	Following feedback at the November Working Group meeting, SECAS is working with the Proposer to resolve the issues before returning to the Working Group. As such, this has extended the return date from February 2024 to March 2024.
MP184 'Increase smart capability of SMETS2 Twin Element ESME to support solar and storage use cases'	SECAS is working with the Proposer to develop the business requirements sufficiently to meet the DCC's request. Once this is completed, SECAS will request the Preliminary Assessment. The Report Phase date is now August 2024.
MP224 'SEC Performance Assurance Framework'	SECAS is working with the Proposer to gather the further detail needed to develop the solution. This will then be discussed with SEC Panel. The Report Phase date has changed to March 2024.

6. On-hold modifications

Below are the modifications which are currently on hold. This means SECAS are not working on these modifications and are waiting for the criteria to be met to take them off hold. This is a list of updates regarding these modifications. Should the modification appear to be unable to progress, SECAS will present this to the CSC to provide a recommendation to the Proposer that the modification needs to progress.

Modification	Update
MP085B 'Synchronisation of Smart Meter voltage measurement periods (meters currently installed)'	The Proposer has stated that they would like to employ a third-party consultancy to perform a cost benefit analysis on the issue and Proposed Solution to help build the business case of the modification. Once completed, SECAS will issue the Refinement Consultation.
MP165 'ESME Voltage Accuracy'	The Proposer has stated that they would like to employ a third-party consultancy to perform a cost benefit analysis on the issue and Proposed Solution to help build the business case of the modification. Once completed, SECAS will issue the Refinement Consultation.
MP187 'Incorporation of Target Round Trip Times and Target Success Rates into the SEC'	This modification is linked to the progression of MP242. This will remain on hold until progress has been made with MP242. MP242 is currently undergoing a Refinement Consultation before the Impact Assessment is requested.
DP197 'Reallocating Third Party Communications Hubs in the event of a SOLR'	SECAS is waiting for confirmation from the Proposer about the next steps for this modification. A verbal update will be provided in the CSC meeting with further details on the details of why the modification cannot be withdrawn.
DP206 'Allowing Generation Licence Holders to apply Export MPANs'	This Draft Proposal has been highlighted as potentially being included in a cross-code change. SECAS is waiting to receive the business requirements to determine what SEC changes needed to take place.
MP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'	The Proposer for this modification has also raised MP219 'Accessing Consumption Data on behalf of SEC Parties' , which involves data privacy changes. Until a decision has been made from Ofgem as to whether MP219 should be approved, the Proposer would like to wait to see if MP234 should be pursued.
DP238 'TSAT Expired Communication Hubs'	Due to questions regarding the TSAT not achieving its purpose of driving Parties to install Communications Hubs by certain dates, the DCC has agreed to speak to the OPSG to gain further feedback. As such, this modification has been placed on hold as of 17 August 2023.

7. Anticipated Modification Proposals

These are the anticipated modifications which SECAS is currently working on. We seek the CSC's early view on these anticipated modifications whilst SECAS undertakes further investigation.

Modification	Update
AM318 - SEC Alignment with DCC SMETS1 MHHS Capacity Requirements	The DCC require changes to SEC Appendix AM 'SMETS1 Supporting Requirements' to align the document with the agreed solution implemented as part of MP162 'SEC changes required to deliver MHHS' , enabling the increase of capacity requirements for MHHS. The MHHS Capacity requirements were separated from the other MP162 Meter Data Retriever (MDR) requirements by Ofgem and instead the DCC were directed to commence work on the capacity changes needed to deliver MHHS.

8. Recommendations

The CSC is requested to:

- **APPROVE** the packages of work and the progression timetables outlined in this paper
- **AGREE** the prioritisation of the new Draft Proposals raised this month; and
- **PROVIDE** feedback on the anticipated modification proposals.

Ben Giblin

SECAS Team

17 October 2023

Attachments: **Appendix A:** Prioritisation scoring worksheet