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SEC Change Sub-Committee Meeting 59_1601

16 January 2024, 10:00 – 11:50

Teleconference

SECCSC_59_1601 – Final Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	Ali Beard (AB)
Large Suppliers	Emma Johnson (EJ)
Small Suppliers	Daniel Davies (DD)
Network Parties	Kelly Kinsman (KK)
Other SEC Parties	Jeff Studholme (JS)

Representing	Attendee
DCC	David Walsh (DW)
	Chris Thompson (CT)
Ofgem	Scott McPhillimy (SMcP)
Drax	Paul Bedford (PB) <i>(Part meeting – Discussion of DP262)</i>
Opus Energy	Dave Gilkes (DG) <i>(Part meeting – Discussion of DP262)</i>
	Greg Williams (GW) <i>(Part meeting – Discussion of DP262)</i>
SECAS	Rachel Black <i>(Meeting Secretary)</i>
	Kev Duddy (KD)
	Mohammedanwar Sumro (MS)
	Simon Grimwood (SG)
	Ben Giblin (BG)
	Georgiana Severin (GS)

Managed by

Representing	Attendee
	Abigail Hermon (AH)

Apologies:

Representing	CSC Member
Large Suppliers	Emslie Law

1. Welcome and Introductions & Approval of Previous Meeting Minutes

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

The CSC noted that comments had been raised on the last meeting minutes. The CSC **AGREED** the amendments to be made and **APPROVED** the minutes as final.

2. Actions Outstanding

Action Reference	Action
56/03	SECAS to confirm how the CSS to DCC gateway is governed. SECAS (KD) advised that MP200 'Faster Switching consequential changes to the SEC' added the legal text for CSS consequential changes. It added a section on Security obligations for the CSS Provider. This has references to Section G3.9 which requires the SSC to review the system or components before being put into operation. The Security Sub-Committee (SSC) reviewed the DCC Risk Assessment and an architecture diagram as part of delivery of the CSS changes and raised no objections. Status: Closed
58/01	SECAS to correct the MP256 legal text before issuing for MRC. SECAS confirmed this was corrected after the previous meeting. Status: Closed
58/02	SECAS to confirm with the SMKI PMA Chair as to whether the principle of cascading validity periods is still deemed appropriate. SECAS (KD) advised that they held a meeting with the DCC, and it was confirmed that this applies to specific use cases, and it is business as usual for the rest of the Certificates. SECAS confirmed that this will remain unchanged, and that the operational risk in this situation outweighs the security risk. The Chair added that this applies to MP261 'Extending the Organisation Certificate Validity Period' specifically. Status: Closed

3. SEC Modification Progression

MP223 'WAN Coverage Reporting'

The Smart Energy Code Administrator and Secretariat (SECAS) (BG) presented the CSC with a summary of [MP223 'WAN Coverage Reporting'](#), recommending it be progressed to the Report Phase.

A member (JS) asked for clarification regarding whether the new reporting would be split between Smart Metering Equipment Technical Specifications (SMETS) 1 and SMETS2 Devices. SECAS confirmed this, adding that there will be one report for each Communication Service Provider (CSP) Region. The member acknowledged this and noted the importance of visibility of low Wide Area Network (WAN) for SMETS1 Devices. Furthermore, they questioned the benefit of changing a SMETS1 meter currently operating with a 2G Communications Hub to a SMETS2 meter until 4G Communications Hubs are being installed. They further stated that for SMETS1 reporting, Parties can see the CSP Region the meter is in, however will be unable to see the exact postcode. SECAS noted this and advised that it will report on if it is a SMETS1 or SMETS2 meter, and if it is low, medium, or high WAN signal, similar to what is currently reported.

The member recommended an addition to support the business case. They highlighted that abortive visits should be avoided, as well as where meters are installed and then removed. They noted that the cost of removing a meter is between £210 and £280. They suggested adding this into the Modification Report to boost the business case for the modification. SECAS (BG) advised they will note this in the Modification Report.

The CSC:

- **AGREED** that MP223 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP255 'WAN issues during Smart Meter installations'

SECAS (BG) presented the CSC with a summary of [DP255 'WAN issues during Smart Meter installations'](#), recommending it be progressed to the Refinement Process.

The DCC (DW) advised that this will be a DCC System impacting change.

The Chair advised that CSC member (EL), who is also the Proposer of DP255, had sent comments ahead of this meeting in relation to DP255, which the Chair read out. The Proposer acknowledged that there will be a long Refinement Consultation process, as it deals with a lot of issues. They explained that sometimes the WAN and Communications Hub (CH) births, this is considered a successful installation according to the SEC text, but the WAN signal is not strong enough to connect other Devices (meters, IHDs etc.) and therefore it cannot be made into a functionality Smart Metering System (SMS). The DCC (DW) agreed with these comments, and noted there will be a lot of process mapping. They commented that the install and commission process is more of a suggestion rather than mandatory process. They agreed that the Refinement process may take longer than usual.

A member (EJ) asked if the Proposer suggests DP255 should progress to the Refinement Process. The Chair confirmed this.

Another member (JS) noted that 25% of SMETS2-to-SMETS2 exchanges happen during a two-month period after the first meter has been installed. They advised it will be good to investigate the reasons

behind this through the Refinement process and Working Group. They noted that there is some data on this within industry that they might be able to assist SECAS and the Proposer. They advised that this gives a good indication of the overall issue and a breakdown of what is causing this. They suggested it would be useful to bring this to the Working Group and get input from other stakeholders. However, they agreed it will be a long process. The DCC (DW) agreed and advised that aiming to complete all the work involved by November 2024 is optimistic. The Chair acknowledged this, and advised this will become clearer as the modification progresses.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP255 should be converted to a Modification Proposal
- **AGREED** that MP255 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP255

DP257 'DCC Management of Duplicate Messages'

SECAS (GS) presented the CSC with a summary of Draft Proposal [DP257 'DCC Management of Duplicate Messages'](#), recommending it progress to the Refinement Process.

A member (JS) asked if DP257 is dealing with duplicate messages which are the same request from the same Party, or two Parties asking for the same data on the same day. They advised that there needs to be clarity as to which scenario DP257 is focusing on. The DCC (DW) advised that both are correct. They added that the DCC do not have data on people sending the same Service Requests (SRs) for different periods of the day. They advised that SR4.6.1 can get data immediately, even when it is requested repeatedly. They also suggested the title of DP257 could be changed to better reflect the purpose of the modification. They noted there are more potential solutions that could be considered, but they will need to gather more data. The member agreed that having a more accurate title is important, so people know what the modification entails. The Chair agreed this will be considered.

Another member (DD) queried if duplicate messages are rejected after the first one has already been processed. They also asked if it depends on whether or not it has the same request identification (ID). The DCC advised they were unsure. The member noted it would be interesting to know the difference between a true duplicate and multiple messages of the same SR from Parties. They noted they have a process in their adaptor that says it will not send the same request ID again unless it receives a 'too busy' response. The DCC advised that retries are also being considered.

The Chair advised that SECAS will consider changing the title, but it will remain as it is until the question becomes clearer, as there appears to be lots of message types. The member (DD) suggested there will be a different solution if it is the exact same message and not the same message being sent with a different request ID or time.

The Chair advised that CSC member (EL) had sent comments on DP257 ahead of this meeting as they could not attend, which the Chair read out. The member suggested DP257 was related to [MP162 'SEC changes required to deliver MHHS'](#) and market-wide half-hourly settlement (MHHS). The member commented that it appears the industry is being asked to pay the cost of what the DCC should be able to do themselves, and so should be funded by the DCC. The member also noted that it is not possible to validate if DP257 has a business case at this stage. The DCC (DW) advised that DP257 is a self-contained modification, not related to MP162 or MHHS. They advised that the figures

in MHHS cover an expected increase in traffic, which was agreed by the Working Group at the time. They advised that the aim is to stop multiple messages being sent to end Devices, smart meters, and Communications Hubs. They stated that the primary focus is reducing traffic going through Devices where there are congestion problems, and the DCC does not want to spend more money on this. A member (JS) added on to the points raised by EL noting that it will become clearer if this needs to be a SEC Modification as the issue is investigated further.

Another member (DD) stated that they are supportive of DP257. They noted that it was never expected that this many messages would be going through the system when it was originally set up. They agreed that hardware cannot continue to be used to fix it, as this is not cost effective. However, they advised that this is not only a DCC System issue, as some Devices cannot respond if they are bombarded with requests. Therefore, DP257 will not only benefit the DCC, but improve a Device's ability to receive requests. They noted there will be significant costs, but this will be beneficial in the long run.

A member (JS) advised that they understand the scale of the issue and the need to resolve it, but they are not convinced this should be a modification, as this focuses on system design, on end-to-end change. The DCC (DW) noted this concern, but stated that SMETS2 data is encrypted at source, so the Data Service Provider (DSP) cannot decrypt it as stated in the SEC. They advised that if one of the proposed solutions involves the DSP decrypting it and storing it somewhere else, this will have an impact on the SEC. They added that it could also limit the number of SRs that a Party can send each day. The member noted this, and suggested this is proposing a change to avoid other related modifications being raised. However, they queried what overlap exists with traffic management, and if there should be a central data store. They agreed with DD's point about bombarding the Devices with requests, as this will deplete the battery in the GSME. They stated there are lots of other industry programmes investigating this issue. The DCC agreed with these comments and advised that the network traffic management piece will help this issue. They advised that the Technical Architecture and Business Architecture Sub Committee (TABASC) will be involved as DP257 progresses. The DCC advised there are a couple of Proposed Solutions, but they will need to further investigate how they will interact. The member (JS) suggested a Venn diagram be drawn up for all of this, to give a better visual representation of where things overlap. They noted it would not be beneficial to raise something else if it is already being discussed elsewhere. The DCC acknowledged this, and advised the traffic management piece will list out everything the DCC believe is being impacted. They advised it will also list previous SEC Modifications that have been rejected. The Chair asked if it is still planned for the DCC to initially present this in the February meeting, before providing a more detailed presentation in April. The DCC confirmed this.

A member (EJ) queried how much more work could be done on DP257 while in the Draft Proposal stage, as a Preliminary Assessment (PA) cannot be requested while it is in the Draft Proposal stage. The Chair advised other solutions can be investigated while in the Draft Proposal stage. However, the Chair agreed there would be limitations without the PA. Another member (DD) advised they were not interested in the solutions yet, as the impact still needs to be defined further. The member queried when it will become an issue for the DCC to hit their Target Response Times (TRTs). They added that there needs to be a clear definition of if it is duplicate or multiple messages that are being investigated. A member (JS) queried the DCC's issues with retrieving data on DP257, as they were the Party that raised the modification. However, they agreed that the issue and impact need to be more clearly defined before progressing. The DCC noted this, and reminded the CSC that there are no costs directly incurred by requesting a PA.

A member (DD) expressed concerns about what is being assessed, and noted there are issues with the modification title. They advised there is a wider scope to assess.

SECAS (KD) asked for clarity on what the DCC is being asked to provide. SECAS asked if it would be better to put the messages into categories, such as if they are duplicates, the same User sending the same request, or multiple parties requesting the same information. A member (JS) advised it would be useful to know which ones need to be tackled.

SECAS (KD) asked if the DCC will have issues collecting the information the CSC has asked for. The DCC (DW) advised there will be limitations if it is to remain in the Draft Proposal stage. They noted that they know there is a problem on the surface that needs to be solved, but do not yet know the detail of the problem. A member (DD) acknowledged this, but raised concerns about progressing it as a Modification Proposal that might only resolve a fraction of the messages. The DCC (DW) noted this and advised it would be useful to bring this to the Working Group to help refine the issue.

The Chair acknowledged the concerns raised, and proposed DP257 remain in the Development Stage, and SECAS will work with the DCC to gather more information. The Chair proposed that DP257 be brought back to the CSC next month when they have more information.

The CSC:

- **AGREED** that DP257 should stay in the Development Stage to fully define and understand the issues

DP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'

SECAS (MS) presented the CSC with a summary of new Draft Proposal [DP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'](#), recommending it remain in the Development Stage.

A member (JS) advised there was another modification raised recently in relation to moving the Technical Specification Applicability Tables (TSAT) maintenance out of the modification process and managing it elsewhere. They also noted the issue with DP262 is that stock is not being rotated and managed. Opus Energy (GW) advised that the cut off point for when they could install Communications Hubs as compliant ended in April 2023, which is why there is only a small percentage recorded as being installed. After this, they had been advised to not install as it would not count towards the roll out target. The member advised it would make more sense to include the numbers that were installed from April 2023. They commented that they experienced similar issues of meter stocks falling outside of their limits, and not being installed even when they were extended. The member queried if this should be a modification, or if it could be managed outside the modification process.

SECAS (MS) acknowledged these comments, and highlighted that the TABASC had advised that they only want one extension from [MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date'](#). However, they advised there will be further discussions on this. The member (JS) noted this and highlighted that the cost of returning the Communications Hubs will be £3.7 million. Again, they queried if this should be a modification. The Chair stated DP262 will need to be presented to the TABASC. They advised there is a Chair meeting scheduled for the next day, and they will discuss with the TABASC Chair if the extension should take place.

The member asked if the roll out of 4G has been taken into consideration. They highlighted that this change is being proposed to avoid return costs. However, they noted that the Communications Hubs would be swapped out under the 4G roll out programme, despite the extension, meaning the costs will be incurred either way. The Proposer (PB) acknowledged this but advised that the extension will need

to take place because of the costs on the industry of recycling the Communications Hubs. The member noted this but stated that the costs will still need to be paid regardless.

The CSC:

- **AGREED** that DP262 should stay in the Development Stage to fully define and understand the issues

4. SEC Modification Timetables

SECAS (BG) provided an update on the timetables for Modification Proposals, providing an updated Prioritisation Matrix and summaries of high and very high priority modifications.

A member (EJ) advised that the SECAS website stated [MP224 'SEC Performance Assurance Framework'](#) is targeted for an Ad Hoc Release in April, but questioned if this was correct. SECAS (KD) advised that there will be a Change Board decision in April, and the Ad Hoc implementation will take place after that. They added that they will need to find out how much lead time Parties will need after the decision before implementation.

The member raised concerns about how larger firmware updates will be affected if [MP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#) is delayed. SECAS (MS) advised that the solution has changed and noted that respondents to the Refinement Consultation expressed concern. They stated these concerns will be investigated as MP230 progresses. The member noted this, but asked what will be done in the meantime, as firmware updates that are larger than the limit are being rejected. The Chair advised that if a large batch of firmware updates to SMETS1 are submitted, the DCC will contact the Party and arrange for the update to be scheduled for a specific time, due to the logistics. The Chair advised that currently, Parties who have large SMETS1 firmware update requests contact the DCC Service Desk to arrange the schedule. Therefore, everything is being progressed in the meantime, but the DCC would like for it to be included in the SEC to clarify what the TRTs should be. This is in case anyone else accumulates a large SMETS1 portfolio. The DCC (DW) believed that the Proposed Solution had not changed substantially. They advised that the proposed process is in place, and the DCC are formulating the numbers around it. The Chair agreed that the process is currently running but highlighted that it was stated in the Modification Report that Suppliers could submit 12,000 firmware updates, but this has decreased to 500. They advised that this needs to be discussed at Working Group.

The CSC:

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

5. SEC Releases Update

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

A member (EJ) asked if there will be changes in reporting to [MP176 'Customer Analytics Reporting'](#) as it is being moved from the November 2024 SEC Release to the February 2024 SEC Release. The Chair advised that the aim of MP176 is to provide a front end on the DCC reports, meaning Parties can view items in a better format, and manipulate data more effectively. They added that this is not reporting will not affect the DCC Total System. They stated that if it is agreed for February implementation of the legal text, the DCC will have from February to 31 December 2024 to procure

and build the User interactive function. If the DCC miss this target, they will be non-compliant with the SEC.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper

6. DCC Assessments

The Chair presented the CSC with an update on the open DCC Assessments.

No comments were received from the CSC.

The CSC:

- **NOTED** the update

7. Modification Improvement Project update

The Chair gave the CSC a summary of the Modification Improvement Project that SECAS are undertaking to improve the current modification process.

No comments were received from the CSC.

8. Any other business (AOB)

The Chair advised members that a Modifications Improvement Project Workshop is scheduled to take place on 16 February. However, some members advised they would not be able to attend as this is during schools' February half term. The Chair advised the workshop will be rescheduled to facilitate the CSC members' availability.

The Chair also stated that a Privacy Sub-Committee is being set up. They advised members to contact sec.change@gemserv.com if they wished to be added to the distribution list for the call for nominations.

SECAS (RB) advised the members that the Change Sub-Committee elections would begin at the start of February. They advised that a call for nominations will be sent out at that time and encouraged members to email sec.change@gemserv.com if they have any questions.

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

Next Meeting: 20 February 2024