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SEC Change Sub-Committee Meeting 58_1912

19 December 2023, 10:00 – 12:20

Teleconference

SECCSC_58_1912 – Draft 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)
	Richard Vernon (RV) (<i>Part meeting – Discussion of DP256</i>)
	Bradley Baker (BB)
	David Rollason (DR) (<i>Part meeting – Discussion of DP258</i>)
SECAS	Rachel Black (<i>Meeting Secretary</i>)
	Kev Duddy (KD)
	Mohammedanwar Sumro (MS)
	Simon Grimwood (SG)
	Khaleda Hussain (KH)
	Georgiana Severin (GS)

Apologies:

Representing	CSC Member
Large Suppliers	Emslie Law
SMS PLC	David Lane (<i>Proposer for MP252</i>)

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 advised that they are still investigating the issue and will provide an update to the CSC at the next meeting. Status: Open
57/01	SECAS to investigate how far back an Other User can access data once they consumer gives consent.
	The DCC (DW) confirmed that this varies depending on the Service Request Variant (SRV), but the data available is the same as for a Supplier. It advised there is a physical Device limitation where data gets erased after a certain period of time. A member (DD) confirmed that there is cyclical reading in the log. They advised that the Other User is not validated by the Data Service Provider (DSP), but the Supplier is. However, so long as the Other User has the correct certificates, they can retrieve information from the Device. A member (EJ) advised that this action originated from when they told the CSC that they had signed up to an app in October 2023, but it retrieved data from as far back as May 2023. A member (DD) advised that they experienced a similar situation, and it might vary depending on the app. However, they suggested that if consent is given it could include any data that is already on the Device from up to 13 months ago for certain SRVs. Status: CLOSED

3. SEC Modification Progression

MP176 'Customer Analytics Reporting'

The Smart Energy Code Administrator and Secretariat (SECAS) (EW) presented the CSC with a summary of [MP176 'Customer Analytics Reporting'](#), recommending it be progressed to the Report Phase.

No comments were received from the CSC.

The CSC:

- **AGREED** that MP176 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

MP231 'Firmware upgrade pathways'

SECAS (KD) presented the CSC with a summary of [MP231 'Firmware upgrade pathways'](#), recommending it be progressed to the Report Phase.

A member (EJ) referred to the point that information is already available via Release Notes from manufacturers. They stated that once consumers churn the Supplier could end up with meters where they do not have a relationship with the manufacturer. They asked if the information is only available to organisations the manufacturers have a relationship with. SECAS advised that the information would be available from the Meter Asset Provider (MAP) and contact should be made with them. A member (JS) agreed, however, they highlighted that MP231 does not prevent human error.

A member (EJ) complimented the inclusion of views of other forums in relation to MP231 and suggested this be included for all modifications going forward. Another member (JS) agreed and noted it would be useful to include when modifications are in the Refinement Consultation phase.

A member (JS) noted that the costs for MP231 appear to be low, given it is mainly administrative costs. SECAS highlighted that there are also the costs of developing the tool which will take approximately 20 Working Days. SECAS (KH) stated that the estimated implementation cost is £20,696. The member advised that it is easy to create a business case for this if the Proposer believes it will prevent a certain number of meters being affected. They noted that MAPs are not impacted greatly by this, but asked if there is still resistance from meter manufacturers. SECAS (KD) advised that meter manufacturers are concerned about resources and effort but are comfortable with the commercial element of the solution, as it means the ZigBee information will not be made public.

The DCC (DW) asked when this is due to be implemented. SECAS advised that it will be implemented as an Ad Hoc Release, two months after it has been approved. They advised there would be no real decrease in the costs associated with it if it was included in a release.

A member (JS) commented that he believed that manufacturers were concerned because the CPL was being used to mandate them to carry out an action when they are not otherwise required to do so. They noted that though it appears to only be a commercial incentive, it still costs them, and they have no ability to mitigate this. SECAS noted this and advised that whilst manufacturers do not have strong views about MP231, they are more concerned about the precedent being set.

The CSC:

- **AGREED** that MP231 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP259 'Triage System Interface Definition'

SECAS (GS) presented the CSC with a summary of Draft Proposal [DP259 'Triage System Interface Definition'](#), recommending it progress to the Report Phase.

A member (JS) advised that they agree with the progression of DP259, noting previous modifications raised to extend dates/versions. They highlighted that removing dependency on a modification to address this supports the business case, assists with future proofing, and will avoid more modifications being raised to address this. They added that it also appears to be introducing a governance regime that is easier to administer.

The DCC (DW) noted that previous considerations around updating the wording from Transport Layer Security (TLS) v1.2 to 1.3 have stopped as this update from one specific version to another specific version would have required DCC System changes. They advised that there will be no DCC total system costs.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP259 should be converted to a Modification Proposal
- **AGREED** that MP259 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP256 'SEC Alignment with DCC SMETS1 MHHS Capacity Requirements'

SECAS (SG) presented the CSC with a summary of Draft Proposal [DP256 'SEC Alignment with DCC SMETS1 MHHS Capacity Requirements'](#), recommending it progress to the Report Phase.

The DCC (DW) advised that capacity changes to supply Market-wide Half-Hourly Settlement (MHHS) are being delivered under internal DCC Change Requests and not through [MP162 'SEC changes required to deliver MHHS', as previously directed by Ofgem](#).

A member (JS) noted that the concept of the DCC storing data for a period of time to help with the flow of traffic had been raised in other forums. The DCC (DW) advised that it intends to hold data for 25 hours, so that subsequent repeat Service Requests will not have to travel the length of the DCC Total System into the Smart Metering Equipment Technical Specifications (SMETS)1 Device and back each time they want to retrieve data. The member noted the benefit but stated that up until now the DCC never held data, and solely transported it. The DCC advised that this was discussed during the progression of MP162 in the Security Sub-Committee (SSC) and Technical Architecture and Business Architecture Sub-Committee (TABASC) meetings, and the technical solution for a secure temporary cache was approved. The member accepted this but noted it is a fundamental change. The DCC advised that the requirement that came out of the SSC and TABASC meetings was involving that of encrypting data due to be provided to all SMETS1 providers. They stated that the data will only be held for a specific and short amount of time before being erased.

A member (DD) advised that there were some legal text references that had not carried through correctly in the documentation, resulting in 'error references' in Section K.18. The Chair advised that SECAS will ensure this is resolved before DP256 goes out for Modification Report Consultation (MRC). The member agreed they were happy with this.

The member also queried whether this should be progressed as a modification. They noted that multiple changes have been made to SMETS1 Supporting Requirements (S1SRs) without using the

Managed by

SEC modification process and queried why a modification is needed in this situation. They added that changes are normally carried out following a DCC Consultation. The Proposer (RV) advised it is an Ofgem led programme, and the DCC does not have the authority to change the document. The Chair advised that the previous changes were made because they were driven by the Department for Energy Security and Net Zero (DESNZ), even though they went through the DCC Consultation. However, DP256 is being driven by MHHS, which is an Ofgem programme. DESNZ has powers to designate changes into the SEC, whereas this requires changes through the Modification process. The Chair advised that Ofgem would not propose this modification but have given the DCC the remit to provide capacity that is needed to support MHHS.

They noted that Ofgem do not want to determine how the DCC provides capacity only that it does. Therefore, the modification is no longer being progressed as Authority-Determined as industry should decide whether they are happy with the mechanism suggested by the DCC.

The Chair asked if the CSC would like to defer their decision on DP256 to allow SECAS to come back with a more detailed explanation for progressing this as a modification, or to move forward. The member (DD) agreed, and stated that this change needs to take place, and noted that the SMETS1 enrolment was led by DESNZ.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP256 should be converted to a Modification Proposal
- **AGREED** that MP256 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

ACTION 58/01: SECAS to correct the MP256 legal text before issuing for MRC.
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DP261 'Extending the Organisation Certificate Validity Period'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP261 'Extending the Organisation Certificate Validity Period'](#), recommending it progress to the Report Phase.

A member (JS) queried whether the concept of cascading expiry dates was still suitable, if validity periods can be extended to align. The member commented that it appears to be a principle that made sense when it was designed, but might not be now that it has been put into practice. SECAS noted this, and advised they would follow up with the SSC or the Smart Meter Key Infrastructure Policy Management Authority (SMKI PMA) would be able to provide more insight.

A member (DD) asked if DP261 is a replacement for [DP232 ACB Certificates on Install & Commissioning](#), which was previously withdrawn. SECAS advised that being able to re-use existing key information would resolve most issues raised within DP232, but not extended validity periods was separate. The Proposer (BB) advised that they hope to get DP261 included in the February 2024 SEC Release, so testing can begin as soon as possible.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP261 should be converted to a Modification Proposal
- **AGREED** that MP261 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

ACTION 58/02: SECAS to confirm with the SMKI PMA Chair as to whether the principle of cascading validity periods is still deemed appropriate.

DP252 'Amending the process for Communications Hub returns'

SECAS (EW) presented the CSC with a summary of Draft Proposal [DP252 'Amending the process for Communications Hub returns'](#), recommending it progress to the Refinement Process.

A member (DD) questioned whether the solution will be as simple as removing the requirement to decommission the Communications Hub before sending the Communications Hub returns request. They questioned how something that is still on the wall can be verified, and if this makes it easier. SECAS advised this was presented at the Supply Chain Working Group, and comments were received. SECAS advised that people have Communications Hubs in warehouses where they cannot send them back anywhere, and this is becoming a big concern. The member agreed that this will need to be monitored from a 4G perspective, but questioned if this is the correct route to take. They suggested it would be better to look at the confidentiality option instead. SECAS noted this, and advised it was queried if the amnesty route could be considered, but the Operations Group (OPSG) disagreed with this. They advised that OPSG will be asked to consider this again as part of the Refinement Process, and it will then be brought to the Supply Chain Working Group and the Communications Transition Group (CTG).

A member (JS) noted that, from a MAP perspective, this issue is no different to smart meter returns. They added that this issue is probably bigger than the predicted 65,000, and there is also an issue of practicality. They advised that the modification process looks at legal text and other issues, but there is a bigger part of this that will involve communicating to various triaging groups to figure out who the correct owners are. The Chair agreed, and advised these issues can be investigated further during the Refinement Process.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP252 should be converted to a Modification Proposal
- **AGREED** that MP252 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP252

DP257 'DCC Management of Duplicate Messages'

SECAS (GS) presented the CSC with a summary of new Draft Proposal [DP257 'DCC Management of Duplicate Messages'](#), recommending it remain in the Development Stage.

A member suggested that this issue was raised during discussions as part of MP162, and decided it was possible for SMETS1 but not SMETS2. The DCC (DW) advised that it was ruled out at the time as it would involve decrypting encrypted messages, which would be a big undertaking. They also noted at that time the DCC did not have an accurate picture of the number of duplicates that existed, but that now it does the business case has changed.

The DCC (DW) advised that SMETS1 Devices covered by MHHS are only for certain Service Requests (SRs) from Electricity Smart Meters (ESMEs). They suggested increasing the value and urgency rating of DP257, given the number of messages being sent multiple times. A member (JS) questioned what the quantification of savings would be. The DCC (DW) advised that they do not have the figures yet but stated that additional infrastructure would cost in excess of £250,000. They noted that this would impact all service providers and have further costs from them as well.

A member (DD) raised concerns about the increase in traffic, as there are Other Users who have requested months of data. They were surprised that the figures provided were as high as they were and agreed this needs to be resolved as the problem will worsen. However, they noted that the costs will need to be investigated further.

Another member (JS) asked if this is an issue that has been taken from MP162 and been rescoped. The DCC advised this will be a major change, and they currently have figures to show there is a case for this. The Chair reminded members that this issue is not focused on MP162 and advised that traffic will increase regardless of MHHS. They advised that any way to use the network more efficiently should be considered. The member questioned the urgency, and when the system would reach a breaking point. The DCC (DW) advised that their colleagues are currently producing this kind of detailed analysis and would need to include this information when the modification moves to the Refinement Process. The Chair advised that system changes take a long time to implement. They explained that it takes about 14 months to progress through the modification process, 6 months for Device, Build, and Pre-Integration Testing, and 6 months for System Integration Testing. The member (JS) queried how DP257 interacts with other capacity management modifications, and suggested there appears to be a need for a programme to bring all those modifications together. The DCC (DW) advised that there is a programme being created for this, and the DCC hope to present it to industry early next year. They advised that this modification is a different area from south and north bound prioritisation, it is trying to reduce the flow of traffic that must travel through the end-to-end DCC Total System. The Chair noted this and advised a lot of people have been asking for that overall capacity management programme, so they will be looking forward to seeing it early next year. The member asked if it makes sense to spend time on this now if the DCC plan to present the industry with a wider piece of work early next year. A member (DD) advised that DSP re-procurement also needed to be factored into this.

The Chair noted the comments and advised that they need to see the overview of traffic management work being carried out by the DCC. They asked the members if they want to increase the urgency and value to assess the costs, or if they would rather see the traffic management piece first. A member (JS) suggested they wait until the DCC presents their traffic management programme in early 2024. A member (DD) noted that the potential benefits and could be beneficial for other items getting there as soon as possible. The DCC advised that this can be investigated further during the Development Stage. The Chair highlighted that DP257 will be returning to a future CSC, and suggested leaving the urgency and value as it is until then. For now, they suggested they will focus on establishing when the DCC will be presenting their traffic management piece in 2024 and see how all the work fits together.

The member (DD) agreed and suggested that the data be analysed further to break down how much of it consists of different Users requesting the same data, or retries, for example. The DCC (DW) agreed, and stated they would return to the CSC with information on what is being duplicated.

The CSC:

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

DP258 'Aligning requirements for System Outage notifications'

SECAS (MS) presented the CSC with a summary of new Draft Proposal [DP258 'Aligning requirements for System Outage notifications'](#), recommending it remain in the Development Stage.

A member (JS) questioned if this modification should have been raised, noting the low priority scores. The Chair noted this and suggested that SECAS could investigate if this could be addressed in OPSG, and then included as part of a house keeping change. The Proposer (DR) advised that the intention is to align the Business Continuity Disaster Reporting (BCDR) engagement and notification with Planned Maintenance notification. They advised the important thing to note is when outages will take place. They stated that having two different requirements on engagement leads to complications, and aligning the two will prevent this.

The member (JS) referred to The Chair's point about addressing this in OPSG. They questioned if CSC members are directly involved in managing maintenance periods. They stated that if OPSG members agree it is beneficial, then it is worth taking DP258 forward. The Proposer advised that the DCC have just issued a consultation on BCDR tests and schedules for 2024/2025, which is required engagement for BCDR testing. However, they noted that the consultation focuses on BCDR testing only and does not look at the bigger picture of all maintenance, questioning the usefulness of this in isolation.

The CSC:

- **AGREED** that DP258 should stay in the Development Stage to fully define and understand the issues

DP260 'June 2024 SEC Release housekeeping'

SECAS (AB) presented the CSC with a summary of new Draft Proposal [DP260 'June 2024 SEC Release housekeeping'](#), recommending it remain in the Development Stage.

No comments were received from the CSC.

The CSC:

- **AGREED** that DP260 should stay in the Development Stage to fully define and understand the issues

4. SEC Modification Timetables

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

While discussing [MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#), a member (JS) asked if there were still plans to change the title of the modification to better summaries what it is focused on. They highlighted that it is focused on smart meters in restrictive mode rather than managing a Consumer's right to refuse a smart meter. SECAS (KD) responded saying that the current title reflects the issue, and it should not reflect the solution as there could be many different solutions. Another member (EJ) asked when SECAS will be giving an update on their MP169 discussions with the Ombudsman and Citizens Advice. SECAS advised that this is planned to be discussed at the February Working Group.

The member (JS) asked if there are plans to withdraw [MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#). The Chair advised that the Proposer does not want to withdraw MP207. They commented that if the Proposer challenges the Change Board's decision it will be referred to Ofgem. Ofgem require a full assessment of the modification meaning that it is likely that Ofgem will send it back to the Refinement Process to gather more information. SECAS are currently working with the DCC and the Proposer to update the Modification Report to account for this situation.

A member (EJ) queried whether [MP235 'Enhanced Meter Data Access for Other Users'](#) will be put on hold. SECAS advised that it has been put on the waiting list but noted that the modifications currently on the waiting list are expected to come off it in January, as there are a lot of modifications progressing to the Report Phase this month.

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 (JS) asked if it is possible to bring MP169 forward. The DCC (DW) advised this was not possible, as the Impact Assessment still needs to be carried out. They advised that MP169 will also require a Data Communications Company User Interface Specification (DUIS) change, and only one DUIS uplift can take place each year. The Chair agreed and added that DUIS changes are very expensive to upgrade for Users. Also, the more DUIS versions there are, the more testing that is required for the DCC which increases the testing costs for each Release.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper
- **BASELINED** the June 2024 Release Implementation Document

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)

SECAS (RB) advised the members that the Change Board election was now underway. They advised that if they, or anyone they knew, would like to be nominated, they could fill out the online nomination form on the SECAS website.

SECAS (KD) asked the members if they would like to continue to have both papers and slides for the SEC Modifications Timetables Update, highlighting that there is the exact same information in both. The members agreed to SECAS no longer providing the CSC with the SEC Modification Timetables Update paper, and to only provide the excel spreadsheet and slides.

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

Next Meeting: 16 January 2024