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SEC Change Sub-Committee Meeting 61_1903

19 March 2024, 10:00 – 11:55

Teleconference

SECCSC_61_1903 – Draft Minutes

Attendees:

Representing	CTG Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers	Emma Johnson (EJ)	British Gas
	Emslie Law (EL)	OVO
Small Suppliers	Daniel Davies (DD)	ESG Global
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
Other SEC Parties	Jeff Studholme (JS)	Smart Meter Assets

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
OFGEM		
Grace Royall (GR)		
SECAS		
Rachel Black (RB) (Meeting Secretary)	Kev Duddy (KD)	Ben Giblin (BG)
Georgie Severin (GS)	Khaleda Hussain (KH)	Simon Grimwood (SG)
Mohammedanwar Sumro (MS) (Part Meeting – Agenda Item 2)		

Apologies:

Representing	CTG Members	Organisation
Consumers	Caroline Farquhar (CF)	Citizens Advice

Other SEC Parties	Philip Doyle (PD)	Reverve Ltd
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1. Welcome and Introductions & Approval of Previous Meeting Minutes

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

The CSC noted that no 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
60/01	SECAS to advise the CSC of the differences and similarities of MP239 and DP267. SECAS (MS) summarised that MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue' focuses on Certificate misalignment following communication with the Device via a Service Request (SR). However, DP267 'Facilitating the installation and commissioning of meters triaged under Use Case 004' addresses the issue before the Device has been installed. Status: Closed
60/02	SECAS to confirm when the meeting dates for the Privacy Sub-Committee will be. SECAS (RB) confirmed that the first meeting will be held on Thursday 21 March 2024. The meetings will then take place on the third Thursday of every month. They noted that MP219 'Accessing Consumption Data on behalf of SEC Parties' and the Privacy Control Framework will most likely be discussed at the April meeting. Status: Closed
58/02	SECAS to confirm where the additional costs from the November 2023 SEC Release originate from and compare the target and actual costs for other previous SEC Releases. SECAS (AB) advised that SECAS is continuing to review previous SEC Releases to understand where the costs have originated from. They stated they would have an update on this at the next meeting. Status: Open

3. SEC Modification Progression

DP265 'Implementing ADT changes in response to a Security incident'

SECAS (GS) presented the CSC with a summary of [DP265 'Implementing ADT changes in response to a Security incident'](#), recommending it progress to the Refinement Process.

The DCC (DW) asked if an incident has ever occurred where the DCC needed to amend Anomaly Detection Thresholds (ADTs). SECAS (GS) advised they did not believe so. They explained that the Security Sub-Committee (SSC) raised this as part of the outcomes of an incident management exercise in December 2023. The Chair added that it would be useful to state that the ability for the DCC to make changes will be approved and monitored by the SSC. A member (JS) stated that this

appears to be a cosmetic change to cover a risk that has not occurred yet. They noted that the members should consider what would happen if this was not implemented. The Chair noted this and advised that SECAS do not expect this to be a DCC System impacting modification, meaning the costs will be minimal. However, they agreed that members should consider what will happen if the situation remains unchanged.

Another member (DD) asked how the SSC can decide what to set the maximum to, adding that it will probably be set to a high number so everything can go through when there is a backlog. The Chair advised this will be considered during the Refinement Process. They noted it might not be set too high, as this could increase the risk of someone hacking into the system at that time and sending in too many Service Requests. SECAS (KD) added that this measure will only be in place for a short period of time after the incident to clear the back log.

The member (JS) noted that the timeline appeared to have DCC assessments in it. SECAS (GS) noted this and advised that they believed it could be DCC system impacting when drafting the timeline. However, since then they have noted that this will not be the case, so the timeline will be much shorter.

When discussing the recommendations, the member stated that this modification may have been waved through by the CSC in the past. However, they noted it is difficult to agree that this will have an impact when this incident has not occurred yet. Another member (DD) agreed. They also queried if the DCC System would be brought down if a Large Supplier system goes down for a day, resulting in their SRs all being sent to quarantine at the same time. The Chair noted that the main concern was regarding the DCC system going down for a day, meaning no one could send through their SRs, resulting in a large backlog. This may result in the DCC system being overloaded. SECAS (KD) noted that this was raised on behalf of some Large Suppliers being impacted and tries to cater for multiple scenarios. A member (DD) noted that the risk has been identified, but queried how high of a priority the risk is, and how much urgency is there to resolve it. They questioned the need for members to consider this if the incident might not occur for another 20 years. They also questioned if it would actually result in the DCC system being brought down for an entire day.

Another member (EL) expressed concern that the members do not have adequate information to make an informed decision, which is why most security related modifications are waved through. However, they noted that members agree to send these modifications through as they trust the SSC. The Chair noted this and agreed it would be helpful if the CSC had more information from the SSC to show the extent of the backlog they think will build up if the ADTs are not changed. The member understood that there are certain things the SSC cannot disclose. They also noted that the SSC need to consider things that might happen in the future, but these things may be expensive. A member (JS) added that there needs to be a bigger Panel discussion regarding the SSC. They noted that things in the energy industry have changed since the SSC was first set up, and suggested some SSC policies may need to be reconsidered because of this. They added that it is difficult for the CSC to comment on security related modifications, as they are not security experts. Another member (EJ) agreed with the comments raised and added that the CSC do not have enough expertise to determine if this change is required.

The Chair acknowledged the comments made and suggested that DP265 remain in the Development Stage to answer the questions raised so the members are comfortable that it can move forward. A member (EL) clarified that they do not have enough information available to them to make an informed decision. They queried how the members might get the reassurance to agree for DP265 to progress and added that they do not want to hinder any security processes. The Chair noted this and agreed to investigate further. However, if they cannot obtain the information, they suggested the SSC

Chair could attend the next CSC meeting and answer any questions the members have. The member asked if this will impact the modification timeline, and repeated they did not want to hinder the process. SECAS (GS) advised that this will not impact the timeline.

The member (JS) advised that this comes back to the CSC Terms of Reference, as it states that the CSC are acting on behalf of the Panel. The member questioned what risks the Panel were willing to allow. They noted that the impact here might be large, but the probability of this incident occurring is very low. They advised this is not the biggest security modification that has been presented to the CSC but explained that they are trying to manage scarcity of resources, as the time spent on this could be spent on something else. The Chair agreed and stated that this is a good example of how the CSC needs to ensure they have enough information and an explanation as to why they do not have the information.

The Chair acknowledged the concerns raised by the members, and proposed DP265 remains in the Development Stage, and added that this will not affect the implementation date.

The CSC:

- **AGREED** that DP265 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) asked for an update on [DP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'](#). SECAS (KD) advised that DP262 was presented to the Technical Architecture and Business Architecture Sub-Committee (TABASC) on 7 March, who advised there was confusion in relation to the scale of the problem and the impact on Parties. The TABASC stated that more work needs to be done before DP262 is brought back to the CSC. Another member (JS) asked if there has been any progress on allocating the responsibility for SEC Schedule 11 'Technical Specification Applicability Tables' (TSAT) to one of the Sub-Committees. The member noted this but stated that SECAS should be able to allocate such issues outside of the modification process. SECAS noted this but advised that it can be challenging to get other forums to agree to take the responsibility. SECAS advised that TABASC are carrying out work on providing TSAT guidance notes for Parties but was unsure what stage they were at. The member suggested TABASC become the owners of DP262. The Chair noted this but advised that the Operations Group (OPSG) also have involvement with this. They advised they would investigate what can be done about the TSAT tables, and finding an owner for them that does not require a SEC Modification to change them.

The member (EJ) noted the position of [MP254 'Changes to GFI Arrangements'](#) on the prioritisation matrix. They observed that MP254 has been given an Urgency of 0 but noted that the DCC are non-compliant in this situation. SECAS (KD) explained that the DCC are now compliant again, as they have renewed their contract for that year. SECAS agreed that their contract was due to end when MP254 was first raised, but the same issue will occur in November if the problem is not resolved before then.

The member also noted the position of [MP253 'Traffic Management for Price Cap Update Events - User Actions Required'](#), highlighting that Monday 1 April is a bank holiday. They queried if the

urgency should increase as we get closer to the date that is not a holiday. The DCC (DW) advised that they have sent their proposal, and MP253 will start to progress again. SECAS (KD) added that Parties will now be asked to follow guidance in relation to this. The Chair advised that it is a text-only change, meaning it can be implemented quickly once the Modification Report Consultation is complete. They stated that MP253 will be presented to the CSC again and can be implemented before the next Price Control Event.

A member (JS) suggested that the modifications that are on hold be highlighted on the Prioritisation Matrix table going forward. Another member (EJ) agreed and noted it would be useful to highlight this in the SEC Modifications Register. SECAS (BG) agreed to both suggestions and would implement this before the next CSC meeting.

The member (JS) queried if it would be possible to have [DP197 'Reallocating Third Party Communications Hubs in the Event of a SoLR'](#) adopted by another organisation as the Proposer's organisation went into administration soon after DP197 was raised. The Chair acknowledged this but noted that the SECAS legal team have advised that only the Proposer can agree for this to be done. As this is unlikely to happen. The Chair advised that they've suggested as part of the Modifications Improvement Project that SECAS have the power to put a modification up for adoption in a scenario such as this.

A member (EJ) agreed that SECAS should give an more detailed update on modifications that are on hold every quarter. Another member (JS) agreed.

The Chair questioned why [MP184 'Increase smart capability of SMETS2 Twin Element ESME to support solar and storage use cases'](#) has been delayed. SECAS (BG) explained that more clarification was needed during the Preliminary Assessment which caused a delay as the Proposer was on annual leave. They added that the SECAS meeting dates also did not align with the progression of MP184, which contributed to the delay. The Chair agreed with this and stated that the Preliminary Assessment was lengthened as part of the DCC's 'Programme Blue'. They explained that the Project proposes to categorise change, meaning that easier changes will stick to the usual 15 Working Day Service Level Agreement (SLA). However, more complex change will have a 20 Working Day (or longer) SLA instead. They advised that this Project was presented to Panel, and the Panel suggested it should be dealt with within TABASC. However, the Panel Chair determined it should be dealt with within the CSC instead. Since then, the person in the DCC leading the Project has left the organisation, and they have since been considering who should take over the updates on the Project. The Chair took an action to complete this before the next meeting.

A member (JS) asked if Citizens Advice will be able to attend the next Working Group meeting that [MP241 'Interoperability Checker Update'](#) is planned to be discussed at. The DCC (DW) added that the Citizens Advice representative for MP241 had also been ill at the time of the previously planned meeting. The Chair agreed and noted that Citizens Advice did not have the resources to have someone cover the representative at recent meetings but they would be present at the next one.

The member (JS) expressed frustration in relation to the DCC's policy of closing during the December Christmas period when most organisations are open during the three Working Days between Christmas Day and New Years Eve. The Chair noted this, and advised nothing further can be done in relation to this until the DCC change their policy.

The CSC:

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

ACTION 61/01: SECAS to find a forum to take responsibility of the TSAT tables.

ACTION 61/02: SECAS to highlight the on-hold modifications in the Prioritisation Matrix and the SEC Modification Register.

ACTION 61/03: SECAS to confirm who from the DCC will be presenting the Project Blue updates to the CSC going forward.

5. Post Decision Delivery

SECAS (KH) presented an update on the Post Decision Delivery.

The DCC (DW) advised that [SECMP0028 'Prioritising System Messages'](#) was not presented to TABASC on 7 March as originally planned. As a result, they advised that the TABASC and OPSG meeting dates will be later. The Chair asked if the DCC will still be able to present SECMP0028 to Panel on 28 May. The DCC confirmed this, and advised they will send SECAS the new dates.

When discussing [MP231 'Firmware upgrade pathways'](#), SECAS (KD) noted that manufacturers have until Friday 22 March to give feedback regarding the test forms.

When discussing [MP168 'CPL Security Improvements'](#) SECAS added that the DCC is setting up a demonstration meeting with the British Electrotechnical and Allied Manufacturers' Association (BEAMA) and Energy and Utilities Alliance (EUA) members.

A member (EJ) advised that this update was very useful, and it was helpful to have it presented to the CSC going forward.

ACTION 61/04: DCC to send SECAS the new dates in relation to SECMP0028.

6. SEC Releases Update

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

A member (EJ) queried why [MP248 'Requirements for DCC Gateway Connections'](#) is taking such a long time to progress, as it appears to be a straightforward change. The DCC (DW) agreed but explained that they have been advised to present a Risk Assessment on connectivity for Registration Data Providers (RDPs) gateways to the SSC, which has lengthened the process. They advised it will be presented to the SSC in April. The Chair added that the issue is that the RDP in question only receives one file a day, and then must send an acknowledgement back. They had hoped there would be an easy work around for this, but they have discovered it has to go through the cloud connection process. They stated that the DCC are working on the cloud connection process and will apply it to more Parties. However, they need to ensure it is suitable for other Parties to access it.

Another member (JS) noted [MP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#) and [MP253 'Traffic Management for Price Cap Update Events - User Actions Required'](#). They observed that there is a large number of Smart Metering Equipment Technical Specifications (SMETS) 1 that need to be migrated before the end of the year. They queried if there is a risk that

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Parties are waiting for MP230 and MP253 to be implemented before they migrate their SMETS1. A member (EL) stated that MP230 focuses on SMETS1 that have already been migrated. The member (JS) agreed, but expressed concern that Parties will not continue to migrate SMETS1 Devices if they do not think the firmware can be managed. The Chair advised that the behaviour described in MP230 is already happening and MP230 simply documents it.

A member (EJ) asked why there is an ad hoc SEC Release planned for [MP242 'Change to Operational Metrics to Measure on Success'](#) in November 2024, as the November 2024 SEC Release will be taking place at this time. The DCC (DW) advised that MP242 is not part of the DCC Total Systems, and is therefore outside of the November 2024 SEC Release. SECAS (SG) added that during previous discussions it was stated that due to the short turn around to implement MP242 that it might not be ready until after the November 2024 SEC Release, so it was agreed that it would be kept separate. However, if it is ready for implementation on time, it can be included in the November 2024 SEC Release. The Chair agreed.

The CSC:

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

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.

A member (JS) asked if the Issues Group will take place during the Working Group meetings, or will it be a separate forum. The Chair advised it will take place during the second half of the Working Group meetings.

The member asked if the introduction of a bar of progression will need a modification. The Chair advised this would not be necessary, as it is something that is already carried out. The member noted this, but asked if the introduction of the bar will be meaningful, or if modifications will still be pushed through the CSC. The Chair advised that the CSC Terms of Reference asks the CSC members to agree if a modification meets the bar of progression, and if they do not agree, SECAS are to keep the modification in the Development Stage. The CSC members are then asked to provide feedback on what is required for the modification to meet the bar of progression. The member acknowledged this, and referred to [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#) to consider how this would work. They queried if the CSC and other forums could have the ability to stop the progression of a modification, or would the Proposer still have the ability to progress it through the modification process, even if there is disagreement from the Sub-Committees. The Chair advised they would have a more in depth read of the CSC Terms of Reference and come back with an answer to the member's query.

ACTION 61/05: SECAS to confirm if sub-committees can stop the Proposer progressing a modification through the modification process if they do not agree with it.

8. Any other business (AOB)

SECAS (RB) advised the members of the results of the CSC elections. They stated that Emslie Law had been renominated for the Large Supplier seat, and Kelly Kinsman had been renominated for the Electricity Network seat. They congratulated the two members, and reminded the members that the second Small Supplier seat and the Gas Network seat were still vacant. They encouraged members to contact sec.change@gemserv.com if they knew anyone who would like to be nominated to these seats. A member (JS) noted the vacant Small Supplier seat, and queried if an invitation should be extended to the Industrial and Commercial Suppliers to sit on the CSC, as they have more resources. The Chair acknowledged this and noted the vacant Gas Networks seat. They noted that the Gas Networks are no longer involved with the SEC, and suggested their seat could become an Electricity Network seat. A member (DD) added that a similar situation had occurred in TABASC, where they created a new Network Party seat, and increased the number of Other SEC Party seats. The member (JS) also suggested involvement from the DCC Other User Party, and perhaps splitting out the Other SEC Parties from Other Users. SECAS (KD) added that a few Other Users were nominated to the Privacy Sub-Committee, and suggested they could be contacted to see if any would be interested in becoming a member of the CSC.

The Chair highlighted to the CSC that the updated Terms of Reference will state that members must attend 50% of meetings each year, and they or their alternate cannot miss more than three meetings in a row.

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

ACTION 61/06: SECAS to inquire with Other Users if they would be interested in becoming CSC members.

Next Meeting: 16 April 2024