

Change Sub-Committee Meeting 63

21 May 2024

Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



■ CSC Terms of Reference

The CSC is the delegated Sub-Committee of Panel for dealing with Modifications. The CSC has power to determine:

- If the **stage gates** have been completed
- If the **scale** (both sides and therefore business case) is understood
- **Modification is confirmed as the most appropriate solution**
- Affected **SEC areas** identified
- Where applicable, potential high-level **solution** options for resolving the issue have been identified (including, where possible, an assessment of whether costs and complexity would be high, medium or low to inform the benefits case of proceeding).

■ CSC Terms of Reference

Determine whether the solution(s) proposed in a Modification Proposal is sufficiently developed and understood that it can be progressed to a final decision:

- A **solution** (or solutions) has been clearly defined
- The **impacts** of the solution(s) on all participants have been fully identified
- All implementation and on-going **costs** have been drawn out and scrutinised
- The **implementation approach** has been clearly laid out, including the technical specification versions arising from the change
- The changes to the **SEC documentation** have been fully drafted
- The **business case** for change has been fully defined
- An assessment against the Applicable **SEC Objectives** and the **consumer benefits** analysis have been completed
- All questions raised along the way have been **answered**

■ Agenda

1. Approval of previous meeting minutes
2. Actions Outstanding
3. SEC Modification Progression
4. SEC Modification Timetables
5. Post Decision Delivery
6. SEC Releases Costs Update
7. SEC Releases Update
8. Any other business

Agenda Item 1

Approval of previous meeting
minutes

Rachel Black (SECAS)

■ Recommendations

- No comments were received from the previous meeting minutes
- **APPROVE** these minutes as final

Agenda Item 2

Actions Outstanding

■ Actions Outstanding 1/2

Ref	Action	Owner	Update	Status
60/03	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	SECAS are investigating following on from discussions at the April CSC meeting. The DCC have agreed to present more information at the May CSC meeting.	Propose to close
61/01	SECAS to find a forum to take responsibility of the TSAT tables.	SECAS	SECAS discussed this with the Issues Group in May. It was agreed that TABASC would be a suitable Sub-Committee to maintain the TSATs and aligns with current work about delivering guidance to Parties. SECAS has informally discussed this with the Chair who was supportive. Next steps is to develop a suitable framework to do this and present to TABASC.	Open
61/03	SECAS to confirm who from the DCC will be presenting the Project Blue updates to the CSC going forward.	SECAS	The DCC are to begin presenting this at the June CSC meeting.	Open

■ Actions Outstanding 2/2

Ref	Action	Owner	Update	Status
61/04	DCC to send SECAS the new dates in relation to SECMP0028.	DCC	SECAS are still awaiting an update from the DCC.	Open
62/01	SECAS to propose solution options for governance of Release scope and costs to the CSC at the May meeting.	SECAS	This will be delayed until the June CSC meeting to allow time to investigate the issue further following on from discussion at the May CSC meeting.	Open

Agenda Item 3

SEC Modification Progression

MP224 'SEC Performance Assurance Framework'

Kev Duddy

Raised by Emslie Law from OVO

Progress to Report Phase

HIGH

■ MP224: Overview

- SEC does not explicitly define a Performance Assurance Framework (PAF)
- Panel is expected to manage any performance-related matters as they arise

Issue



- Panel's scope is broad and managing matters case-by-case is challenging
- Project identified some issues and instances that may have fallen under scope of a PAF

Impact



- New SEC Appendix 'Performance Assurance Framework'
- Changes to Section C 'Governance'
- New Performance Assurance Board to be created to manage the framework

Proposed Solution



■ Modification key points

Concern

Composition

*Supplier Parties felt more representation needed
Electricity Networks noted Gas Network reps not best placed*

Response

*Large Supplier rep increased from 2 to 3
2 Network Party reps to be elected from either
Gas or Elec*

Change Process

*More governance needed around potential
changes to documentation*



*Risk Evaluation Methodology, Performance
Risk Register, Performance Assurance
Techniques & Performance Assurance
Operating Plan all now require formal
consultation*

Reporting requirements

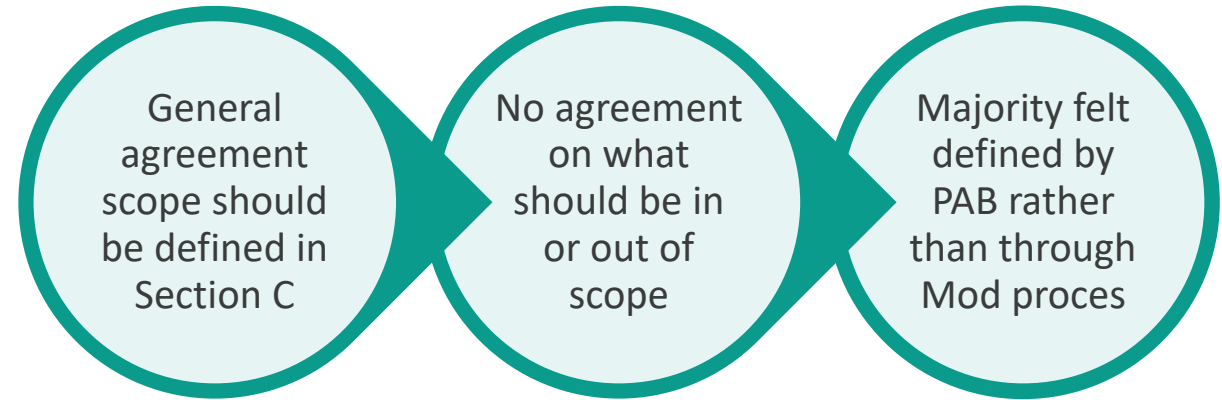
*Can be burdensome and expensive on Parties to
develop and deliver*

PAB shall:

- *rely on existing reports where possible*
- *Ensure any request is necessary,
proportionate and not overly burdensome*

■ Modification scope

Section G 'Security'
Section J 'Charges'
Section Z 'Alt HAN Arrangements'
Section N 'SMETS1 Meters'
Section I 'Privacy'



C9.8 The PAB's functions, powers and duties shall not extend to (or permit the PAB to interfere with):

- a) any functions, powers or duties of the Security Sub-Committee, and/or the operation of Section G (Security); or
- b) any functions, powers or duties of the Alt HAN Forum, and/or the operation of Section Z (Alt HAN Arrangements).

■ Statements of rationale

Alt HAN Co

SEC obligations in scope of the Performance Assurance Framework (PAF) would come under the governance of SEC Panel. However, Party obligations relating to Section Z and the Alt HAN are governed by the Alt HAN Forum. Therefore, we would expect MP224 PAF proposals would not apply to Section Z obligations and therefore not be within scope of the PAF. The Alt HAN Forum could establish activities akin to those imagined under a PAF should there be a need to strengthen compliance with Alt HAN obligations. This ensures there is no confusion over governance, duplication or unnecessary complexity to the existing Alt HAN arrangements.

Security Sub-Committee

<update to be provided in meeting>

■ Forum views

Working Group

Supports the
modification

Differences of
opinion on scope

OPSG

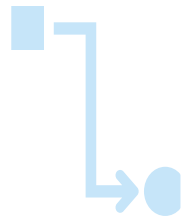
Supports the
modification

Benefits

Noted risk by RFI respondent	Potential consumer or financial impact	Potential risk score	Potential Mitigation target
Failure to complete post-commissioning or SMKI obligations	100-250k consumers	3x5 = 15	25k-100k
DCC Outages	100-250k consumers	3x5 = 15	25k-100k
MHHS and increased DCC traffic	100-250k consumers	3x5 = 15	25k-100k
Suppliers not responding to install code emails	100-250k consumers £5m pa in Device exchange, resource to investigate	4x5=20	25k-100k
Suppliers not keeping firmware up to date	500k consumers	5x5=25	100k-250k
Suppliers not updating the SMI	100-250k consumers 500k money spent on resource to fix	3x5 = 15	25k-100k

A risk-based PAF would identify the areas of greatest risk to the achievement of the SEC Objectives and then make sure that appropriate performance assurance techniques were in place to manage those risks.

■ MP224: Assessment of Change



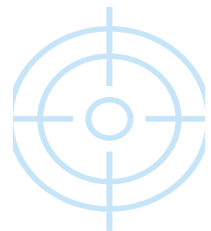
Impacted Parties

- All SEC Parties



Costs

- £185k included within budget



Target Release

- Ad hoc SEC Release (one day after decision)



Benefits

- As previous slide

SEC Objective (a) and (g)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (g) facilitate the efficient and transparent administration and implementation of this Code.

■ MP224: Recommendations

- **AGREE** the issue and the impact it is having is clearly defined and understood
- **AGREE** that MP224 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP224 should be progressed as an Authority-Determined Modification

■ MP230 'Review the SLA for delivery and completion for SMETS1 firmware'

Mohammedanwar Sumro

Raised by Nick Rodgers from the DCC

Progress to Report Phase

HIGH

■ MP230: Overview

- The DCC Systems have a limit to the amount of large SMETS1 firmware images that can be processed
- Firmware images larger than 750kB need to be broken down into multiple images for transmission between the S1SP and DCO
- Current SLA cannot be achieved for firmware images bigger than 750kB

Issue



- Potential decline in System performance
- If DCC fails to meet System performance, Ofgem may determine a reduction in the baseline margin that DCC may retain for the Regulatory Year

Impact



- SEC Appendix E 'DCC User Interface Services Schedule' (UISS)
- DCC Users to contact the DCC Service Desk to coordinate and agree on a delivery schedule where a batch is larger than 500 images per day and firmware image is larger than 750kB.
- DCC will meet the SLA on the agreed delivery schedule.

Proposed Solution



■ MP230: Key points

Infrastructure upgrade

- Significant investment in DCC System infrastructure is required for an event that is infrequent
- Least cost-effective approach

Firmware Threshold limits

- The TABASC approved the threshold of 750kB to contact the DCC Service Desk when Parties wish to upgrade SMETS1 firmware images over 750kB in batch sizes larger than 500 images

Emergency related firmware updates

- Dealt with separately to larger firmware updates
- Managed on a case by case basis depending on the severity and specifics of the incident

Business Case

- The DCC can manage the updating of a small number of larger firmware images for SMETS1, which would normally be an issue if released onto the DCC System in large volumes

MP230: First Refinement Consultation Key Points

Respondent comment

How far apart must batches be in time?
Is it acceptable to send 11,500 images on Day 1
and then a further 11,500 each on Days 2 & 3
OR
11,500 at 9am on Day 1 and then a further
11,500 at 9:30am

SECAS response

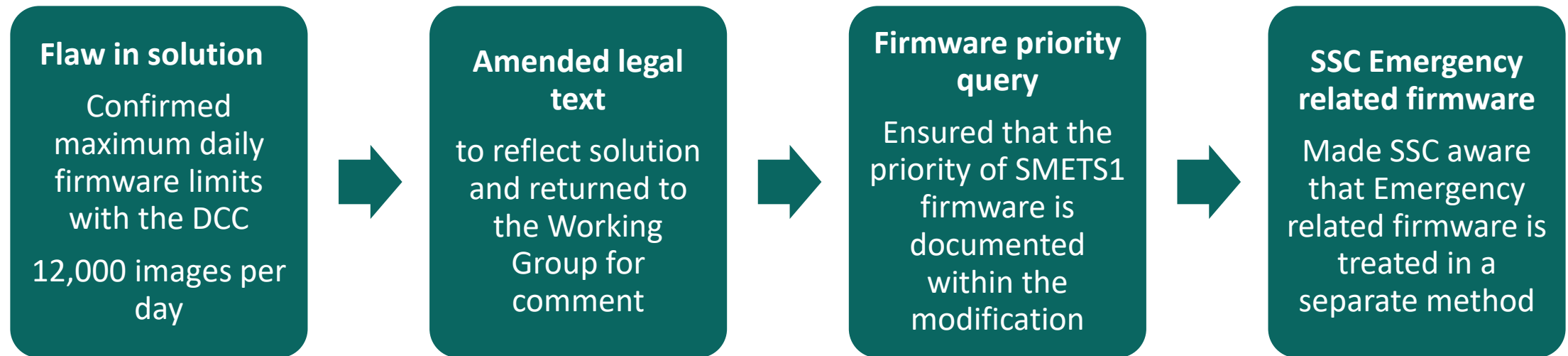
The DCC have confirmed post Refinement Consultation that a Supplier must notify the DCC Service Desk if they intend to send firmware images over of 750kB batched in increments of greater than 500 per day. This is due to the maximum threshold per day of processing

How have the DCC arrived at these numbers?

The DCC arrived at 750kB as there is on Device Manufacturer who has a firmware image size greater than 750kB for which it is unable to meet the five-day SLA – TABASC has agreed to this threshold



■ MP230: Post first Refinement Consultation



MP230: Second Refinement Consultation

Key Points

Respondent comment

Manual, one off piece of work that may be difficult to coordinate.
Requested clarity on what happens if Suppliers are not able to batch correctly.
Concerns around respondents' estate will be too large for the DCC

Are the DCC looking into options to address DCC System constraints with Re-procurement of specific SMETS1 Services during 2024/2025.

The DCC should not assume that SMETS1 systems should only scale downwards ahead of SMETS1 end of life dates

SECAS response

Batches can be dealt with via DCC Service Desk when batches are over 500 images and include a images over 750kB.
Sending updates all at once may cause some to timeout but can be retried in a new batch later.
The DCC are working with the respondent on delivering and completing larger firmware updates

Re-procurement is not at a stage where DCC can assess the infrastructure.
There might be some room for short-term capacity boosts during firmware events, but the details are not yet decided.

Baseline traffic scaling depends on official forecasts validated by observed actuals, with capacity adjusts to these forecasts.
Firmware timings and batch sizes are set based on the patterns and quantities of baseline traffic.



■ MP230: Forum views

Working Group

Supports the modification

Recommended legal text review to ensure intended purpose is delivered

Concerns of how Parties would be prioritised

TABASC

Supportive of the modification

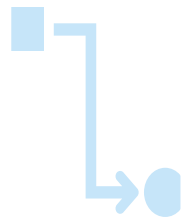
Agreed on the threshold of any batch size quantity and image size applicable

SSC

Supports the modification

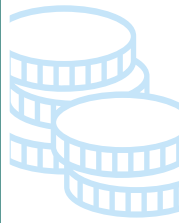
Agreed that Emergency related firmware updates are treated via incidents

■ MP230: Assessment of Change



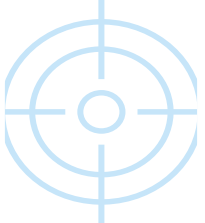
Impacted Parties

- Suppliers
- DCC



Costs

- SECAS implementation costs



Target Release

- November 2024 SEC Release



Benefits

- Less risk of System degradation

SEC Objective (b)

(b) Enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence

■ MP230: Recommendations

- **DETERMINE** the issue and the impact it is having is clearly defined and understood
- **DETERMINE** that MP230 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **DETERMINE** that MP230 should be progressed as a Self-Governance Modification

■ MP246 'DCC User access to metadata via the DCC Self-Service Interface'

Khaleda Hussain

Raised by James Burney on behalf of SSE Energy Supply Limited

Progress to Report Phase

The MP246 slides are classified as 'AMBER', please email sec.change@gemserv.com if you would like to access them.

MEDIUM

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

Mo Sumro

Raised by Paul Bedford from Drax
Progress to Report Phase

HIGH

DP262: Overview

- Installation End Date has passed for Communications Hubs on CHTS v1.0 and GBCS v1.1 on 31 May 2023
- Approximately 120,000 Communications Hubs on these specifications not yet installed.

Issue



- Any installation of Communication Hubs on CHTS v1.0 and GBCS v1.1 are non-compliant and will not count towards rollout targets.

Impact



- SEC Schedule 11 'Technical Specification Applicability Tables' to have an extension of the Installation End Date for relevant CHTS v1.0 and GBCS v1.1.
- 2 year extension 31 May 2025

Proposed Solution



■ DP262: Key points

Previous TABASC recommendation Length of End Date extension

- MP221 implemented in January 2023 – Decided that a 3-month extension to IVP and MVP is suitable with no further extension

Known issues on certain firmware versions

- Extending CHTS v1.0 and GBCS v1.1 comes with a risk to consumer experience as Suppliers will be able to install Devices with known issues
- Earlier firmware versions were produced before prepayment was an operational service
- Not possible to upgrade certain Devices

Lack of incentive for Suppliers to install

- Suppliers can still install these Devices where they have passed Installation End Date
- These installations will not contribute towards Suppliers' rollout targets

OPSG

OPSG advised to have a Supplier raise a SEC modification to resolve the issue

No comments received from further interactions with OPSG

TABASC

Does not support the modification

Known issues with Device models on earlier firmware versions

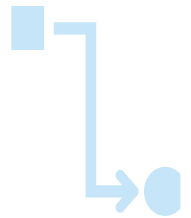
Recommendation to not extend CHTS v1.0 and GBCS v1.1 Installation End Date

SSC

No security impacts by extending the TSAT for CHTS v1.0 and GBCS v1.1

Stated it is not best practice to install due to security characteristics on older Devices.

■ DP262: Assessment of Change



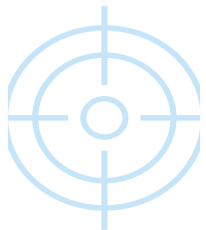
Impacted Parties

- Suppliers
- DCC



Costs

- SECAS implementation costs



Target Release

- Ad-Hoc SEC Release
- 1 Working Day after decision



Benefits

- Allows Suppliers to have installs count towards rollout targets

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

■ DP262: Recommendations

- **AGREE** the issue and the impact it is having is clearly defined and understood
- **AGREE** that DP262 should be converted to a Modification Proposal
- **AGREE** that MP262 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP262 should be progressed as a Self-Governance Modification

DP269 'June 2024 SEC Release Supporting Changes'

Simon Grimwood

Raised by David Walsh on behalf of the DCC

Progress to Report Phase

MEDIUM

DP269: Overview

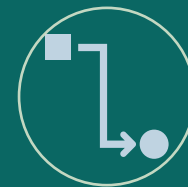
- Following approval of MP256 'SEC Alignment with DCC SMETS1 MHHS Capacity Requirements', the DCC identified some additions to the legal text that are required to accurately reflect and specify the intent of the modification

Issue



- If the legal text amendments are not made, the legal text will not fully reflect the designed DCC solution and could lead to confusion amongst Parties.

Impact



- The Proposed Solution is to make the requested amendments to the legal text of MP256 for the legal text to accurately reflect the intention of the modification.

Proposed Solution

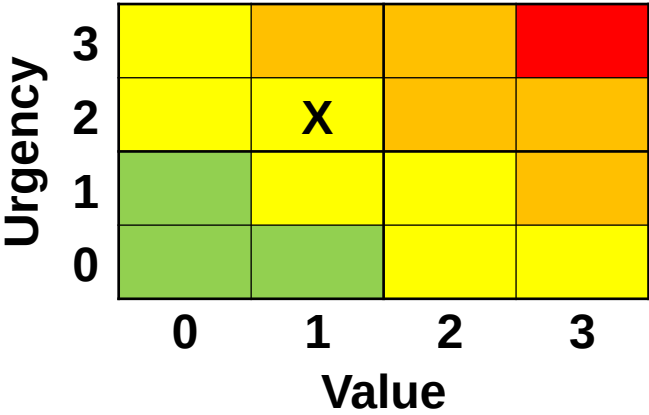


DP269: Prioritisation

Legal & regulatory compliance	Operational performance	Cost benefit	Consumer impact	Security impacts	Weighted value	Urgency	Priority
2	2	0	0	0	1	2	Medium

Rationale

- MP256 is due to be implemented in June 2024, therefore changes need to be implemented in tandem
- Supports the migration to MHHS



DP269 – Legal Text Amendments to MP256

SEC Appendix AM ‘SMETS1 Supporting Requirements’

Clause 18.21

Wording to specify *‘where cache functionality is available’* prior to MHHS migration in April 2025

Terminology of a *‘Day’*, will be replaced by *‘Calendar Day’* to reflect a settlement day period as required by MHHS

Wording changes to allow for variations of timings for a *‘Day’* period amongst Users

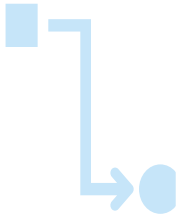
Clauses 18.22 & 18.24

Wording to specify *‘where cache functionality is available’* prior to MHHS migration in April 2025

Terminology of a *‘Day’*, will be replaced by *‘Calendar Day’* to reflect a settlement day period as required by MHHS

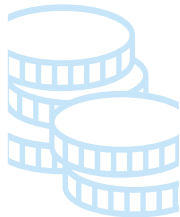
The word *‘only’* to allow Users to retrieve a *‘Calendar Day’* period from an earlier date as well as the previous day

DP269: Assessment of Change



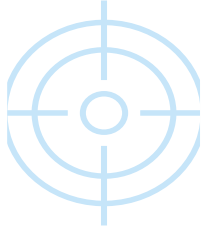
Impacted Parties

- N/A



Costs

- SECAS implementation costs



Target Release

- June 2024 SEC Release



Benefits

- Accurate reflection of MP256 modification intent

SEC Objective (b)

(b) enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence;

■ DP269: Recommendations

- **DETERMINE** the issue and the impact it is having is clearly defined and understood
- **DETERMINE** that DP269 should be converted to a Modification Proposal
- **DETERMINE** that MP269 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **DETERMINE** that MP269 should be progressed as a Self-Governance Modification

Agenda Item 4

SEC Modification Timetables
Ben Giblin (SECAS)

■ SEC Modification Timetables

Ben Giblin

■ Prioritisation matrix

	P218		
	P246 P255 P267	P252	P224 P262
P235 (P238) P244 P248 P260 P263	P085B (P165) P219 P239 P253 (P257)	P207 P230 P247 P266 P268	P169
(P197) (P205) (P234) (P258)	(P184) (P206) P241	(P137)	P094

We are working on 35 active modifications, with ten modifications on hold.

No new Draft Proposals and no changes to prioritisation scoring.

On hold modifications have circular brackets (), whilst modifications on the waiting list have square brackets [].

■ Updates for high priority modifications

MP169 'Managing SEC obligations and the Consumers Right to refuse a smart meter'

- The impact assessment was returned at a cost of £731,501.
- This included testing costs of £348,114.
- SECAS will present the modification to the Working Group before returning to the CSC in June.

DP218 'Review of the SEC Charging Methodology'

- The DCC RFI is open until 25 June.
- SECAS are hosting a FAQ session on 23 May.

MP252 'Amending the process for Communications Hub returns'

- SECAS are working with the DCC and Proposer to finalise the business requirements before requesting the Preliminary Assessment.

■ On hold modifications

MP184 'Increase smart capability of SMETS2 Twin Element ESME to support solar and storage use cases'

- The Proposer has requested two months to investigate the impact of the RTS switch off before progressing this modification.

DP206 'Allowing Generation Licence Holders to apply Export MPANs'

- The Proposer does not intend to use this modification unless BSC change [P459](#) has been implemented.
- SECAS has recommended the Proposer withdraws DP206.

DP257 'DCC Management of Duplicate Messages'

- DCC are re-drafting the problem statement and collating figures about the scale of the issue before returning to the CSC.

■ Changes to Report Phase dates

Mod Ref	Original Report Date	New Report Date	Comment
MP248 'Requirements for DCC Gateway connections'	May 2024	June 2024	DCC are preparing a risk assessment for the SSC. Once the SSC is satisfied, SECAS will present this modification to the TABASC.
MP263 'Improving transparency of DCC indicative costs'	June 2024	July 2024	Delays in the review of the legal text by DCC.

DCC Assessments

Open assessments

Modification	IA/PA	Requested	Accepted	Working days open
MP239	IA	27 Mar 24	2 Apr 24	30
MP241	IA	23 Feb 24	3 Apr 24	31

Assessments completed since last meeting

Modification	IA/PA	Accepted	Returned	Total time open
MP169	IA	11 Mar 24	10 May 24	45
MP246	IA	1 Mar 24	3 May 24	46

■ Recommendations

- **NOTE** the new Report Phase date for the highlighted modifications.

Agenda Item 5

Post Decision Delivery
Khaleda Hussain (SECAS)

■ Post Decision Delivery

Khaleda Hussain
For Information

LOW

■ Post Decision Delivery

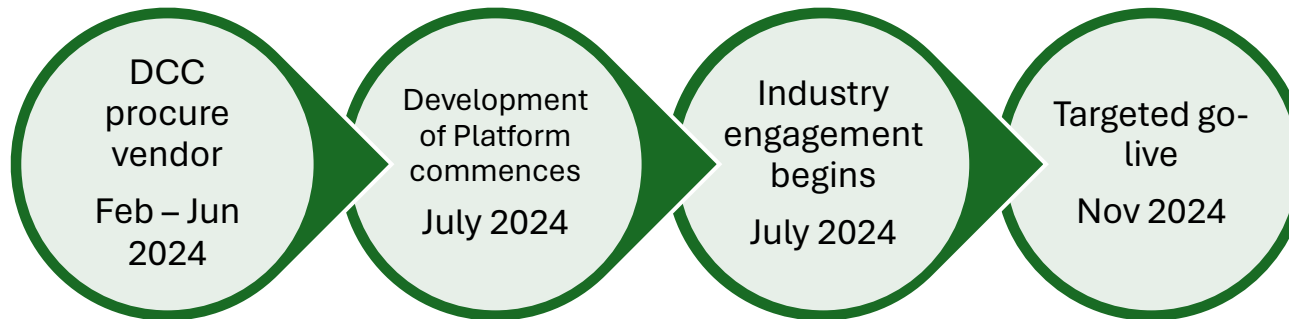
SECMP028

Prioritising System Messages

No updates currently

MP176

Customer Analytics Reporting

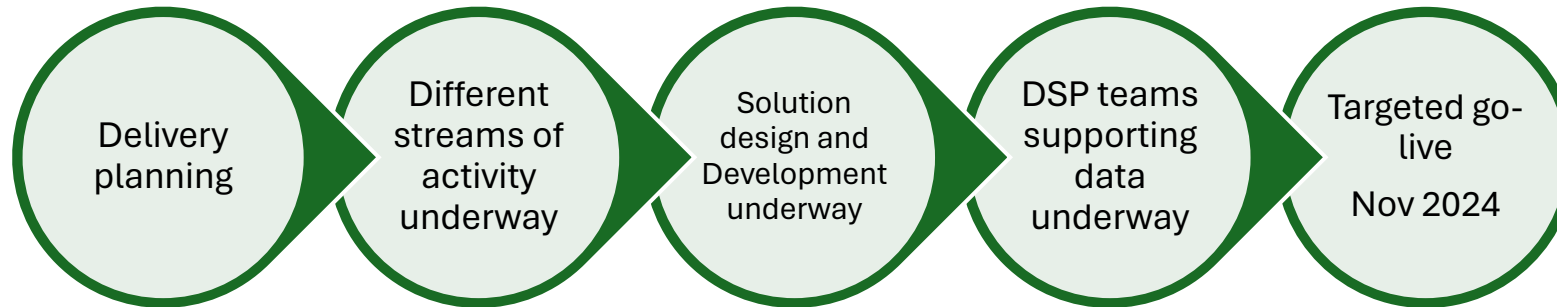


- DCC awaiting applications

■ Post Decision Delivery

MP242

Change to Operational
Metrics to measure on
success

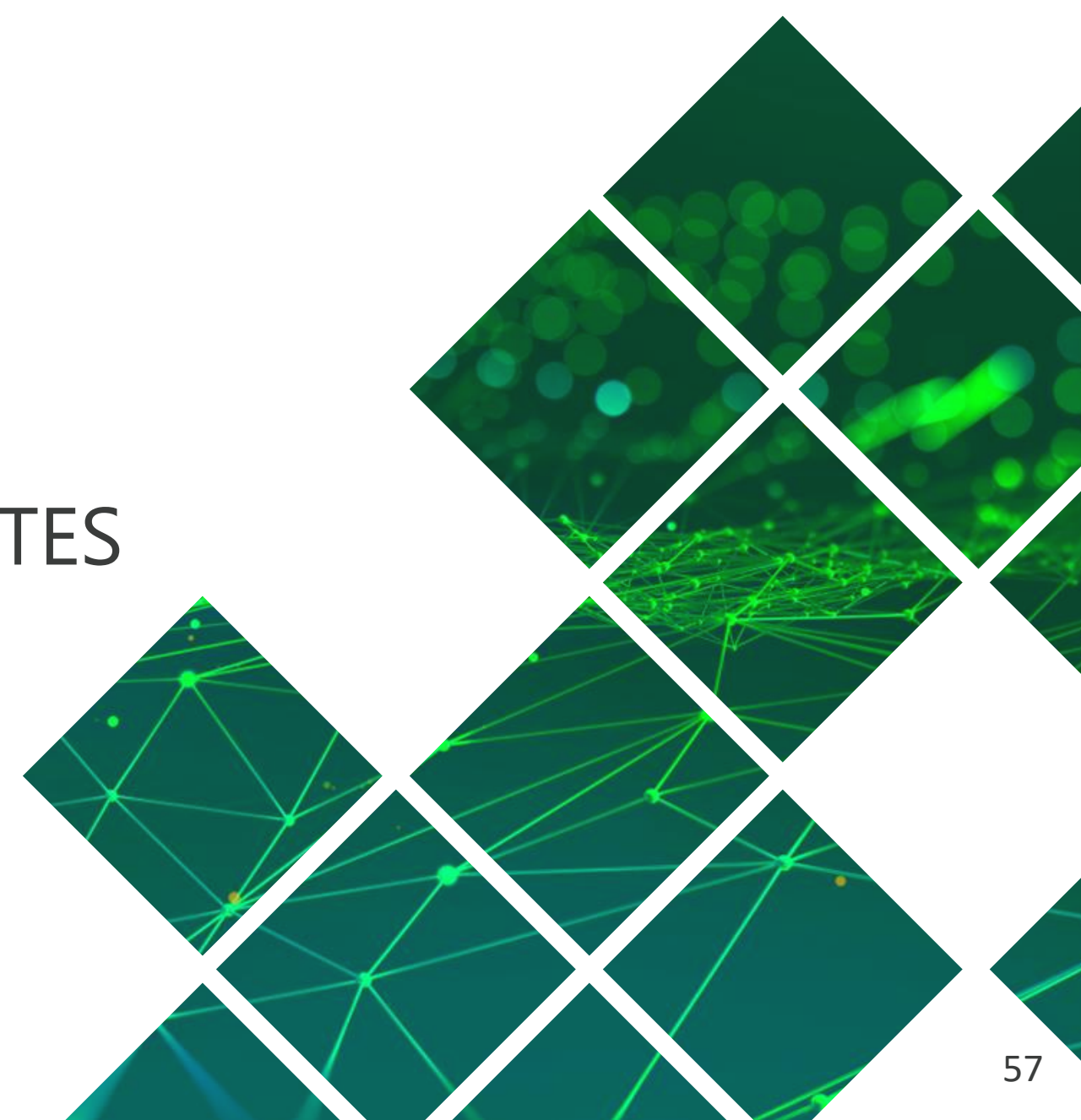


■ Recommendations

The CSC is requested to:

- **NOTE** the updates on the Post Decision Delivery referenced in these slides

BREAK



PLEASE RETURN IN 10 MINUTES

Agenda Item 6

SEC Releases Costs Update Del Kang (DCC)

The SEC Release Costs Update slides are classified as 'AMBER', please email sec.change@gemserv.com if you would like to access them.

Agenda Item 7

SEC Releases Update
Simon Grimwood (SECAS)

■ SEC Releases update

■ BRAG status key

Status	Justification
Red	The targeted release date allows for no extension to the modification timeline, or allows for delay only if subsequent steps are expedited.
Amber	The targeted release date allows for an extension to the modification timeline of up to two months.
Green	The targeted release date allows for an extension to the modification timeline of over two months.
Blue	The modification has been approved for implementation.
	This modification is DCC System impacting.
	This modification is not DCC Total System impacting, however these changes will require amendments to DCC reporting systems, SharePoint, business processes etc.

June 2024 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
MP162	SEC Changes required to deliver MHHS	
MP178	Removing the DSP validation against the SMI join status for SR 8.8.x	
MP211	Aligning the SMI with the CPL	
MP256	SEC Alignment with the DCC SMETS1 MHHS Capacity Requirements	
DP269	June 2024 SEC Release Supporting Changes	

Targeted Modifications		
Mod No.	Mod Name	Status
MP260	June 2024 SEC Release Housekeeping	

MP248 and MP253 have been removed from the scope of the June 2024 SEC Release as further refinement is needed for each prospective Solution, and DP269 has been added to the scope.

■ November 2024 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
SECMP0028	Prioritising System Messages	

Targeted Modifications		
Mod No.	Mod Name	Status
MP085B	Synchronisation of Smart Meter voltage measurement periods (meters currently installed)	
MP230	Review the SLA for delivery and completion for SMETS1 firmware	
MP253	Traffic Management for Price Control Events	
MP263	Improving transparency of DCC indicative costs	

MP085B, MP253 and MP263 have been added to the scope of the November 2024 SEC Release.

February 2025 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status

Targeted Modifications		
Mod No.	Mod Name	Status

There are currently no modifications targeted for the February 2025 SEC Release.

June 2025 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status

Targeted Modifications		
Mod No.	Mod Name	Status
MP169	Managing SEC Obligations and the Consumer's right to refuse a Smart Meter	
MP241	Interoperability Checker Update	
MP246	DCC User access to metadata via the DCC Self-Service Interface	

MP207 has been removed from the scope of the June 2025 SEC Release and has been moved to the June 2026 SEC Release scope.

■ November 2025 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status

Targeted Modifications		
Mod No.	Mod Name	Status
MP235	Enhanced Meter Data Access for Other Users	

MP235 has been added to the scope of the November 2025 SEC Release.

June 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status

Targeted Modifications		
Mod No.	Mod Name	Status
MP207	Allowing Registered Supplier Agents to Maintain Meter Firmware	
MP239	Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue	
MP247	Future Dating of Service Requests for SMETS1 Devices	

MP235 has been removed from the scope of this Release and has been moved forward to the November 2025 SEC Release. MP207 and MP247 have been added to the scope of the June 2026 SEC Release. MP239 will potentially be moved to an earlier release dependant on the DCC FIA and other impacts.

■ Ad hoc SEC Releases

Targeted Modifications		
Mod No.	Mod Name	Status
MP262	Extending the Installation End Date for CHTS v1.0 and GBCS v1.1	July 2024
MP219	Access Consumption Data on behalf of SEC Parties	August 2024
MP224	SEC Performance Assurance Framework	September 2024
MP223	WAN Coverage Reporting	9 September 2024
MP242	Changes to Operational Metrics	12 November 2024

■ Recommendations

The CSC is requested to:

- **NOTE** the updates on the SEC Releases referenced in these slides
- **BASELINE** the November 2024 Release and Release Implementation Document (RID)

Agenda Item 8

SEC Modification Progression (cont'd)

■ MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

Liz Woods

Raised by Tom Woolley from SMS Plc

Progress to Report Phase

MEDIUM

■ MP207: Overview

- Only Suppliers can deploy and activate firmware.
- RSAs are authorised to maintain the Supplier's meters but unable to maintain Device Firmware.
- Burden of maintaining meter firmware versions solely on Suppliers

Issue



- Suppliers that use RSAs, leads to inefficiencies in Smart service
- Increased risk of Device firmware becoming outdated & more vulnerable to security breaches
- Reduced interoperability of Devices

Impact

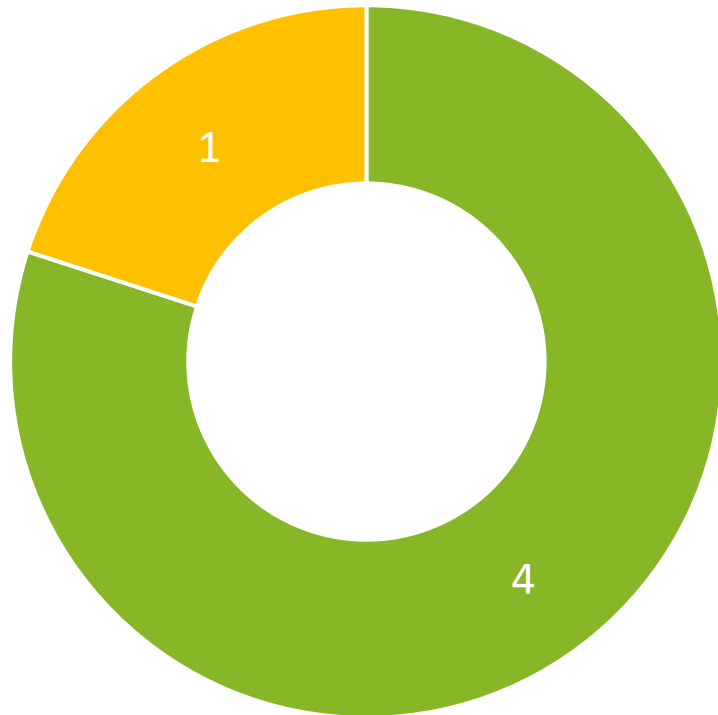


- Allow RSAs to deploy firmware (SRV 11.1 'Update Firmware')
- Suppliers will still need to activate firmware following the deployment.
- No changes to User CIO Assessment.

Proposed Solution



■ MP207: Refinement Consultation Key Points



■ Large Supplier

■ Small Supplier

Key comments

- Five responses, none agreed with solution
- Suppliers noted impacts:
 - Cost for the change regardless if using change or not (£100k-£500k)
 - Change to internal processes to accommodate
- What were impacts to consumers?
 - No discernible benefit
 - Additional cost ultimately paid by consumer
- Mod should not be approved

■ MP207: Working Group comments

Benefits

- 3m Devices not operating in smart mode, which need a firmware update
- Provides a solution to Suppliers who do not have the resource to do this
- Meters on unsupported firmware may have been reduced, if the Firmware had been updated historically.

Concerns

- No desire for change demonstrated.
- Issue not raised by Supplier.
- Only a percentage of those 3m Devices are known to not be able to have the firmware upgraded.
- Issue should be resolved by performance improvement through OPSG.
- Scaled down solution will not resolve the issue.
- Issue with non-communication devices is not just about firmware

TABASC

Possibly advantageous for Small Suppliers to have additional support in deploying firmware

Unlikely with current solution for RSAs to operate to a useful degree on behalf of Supplier

No mod required - RSA can use Supplier's system for firmware maintenance (similar to RSAs with I&C activities)

SSC

No added risk of RSA vs Supplier deploying firmware

No additional User CIO checks if only deploying firmware

Any increased risk is mitigated as activation remains with Supplier

TABASC & SSC are not supportive of RSAs to activate firmware

■ MP207: Proposer comments (1/2)

Concerns

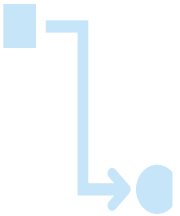
- NAO report list out the millions of meters that are not behaving smart
- We see the impact of out-of-date firmware has on Consumers, DCC traffic, Energy Suppliers, MAPs, Roll Out & importantly the ability to use the Smart Meters for more.
- MHHS success relies on a healthy smart meter portfolio and the firmware management of GBs Smart portfolio
- 4G CH Exchange relies heavily on the health and firmware of GB's Smart Meter Portfolio
- NGESO's Demand Flexibility Service, along with other flexibility schemes relies heavily on the health and firmware of GB's Smart Meter Portfolio
- Estimated across the industry today, for every 10 SMETS2 installations, one SMETS2 meter is removed, which would have been avoided with appropriate Smart Meter Health and Firmware Management practices.
- Huge impact to cost, that is flowed down to consumer bills, and a 10% inefficiency in the Smart Meter Roll Out.

■ MP207: Proposer comments (2/2)

As things stand now

- Should MHHS go live, or 4G CH replacements start, we expect 20% of GB's Smart Meters to cause either initiative to fail.
- 2022/2023 winter's DFS, saw thousands of customers unable to participate in DFS due to the Smart Meter Health of the Meters in their home/business. DFS Winter 2023/2024 we expect to be higher.
- Industry is not addressing this issue and we are proactively trying to support and change that.
- Whilst feel the controversial conversations had in this SECMODs process to date have helped bring the topic up a level, it has been very frustrating that the foundations for rejection is
 1. denial of an issue that needs to be fixed; and
 2. targeted and vocal rejections where the end solution could compete with a service offered by a particular Energy Suppliers systems as a USP.
- Accept could pursue self-funding via DCC ECS, with same targeted SEC Release June 2025, however that is too late, to mitigate the points made.
- Accept that SEC Change Board will likely reject the Modification, however, we would like Ofgem to make the final decision.

■ MP207: Assessment of Change



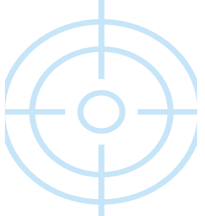
Impacted Parties

- Suppliers
- Other SEC Parties (RSAs)
- DCC



Costs

- As per PA, up to PIT = £151,000 - £350,000
- Estimated full cost = £450,000 - £650,000
- Supplier internal process changes



Target Release

- June 2026 SEC Release



Benefits

- Assist Suppliers to maintain firmware (only deploy)

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

■ MP207: Recommendations

- **AGREE** the issue and the impact it is having is clearly defined and understood
- **AGREE** that MP207 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP207 should be progressed as an Authority-Determined Modification

Agenda Item 9

Any Other Business

■ AOB

- No AOB

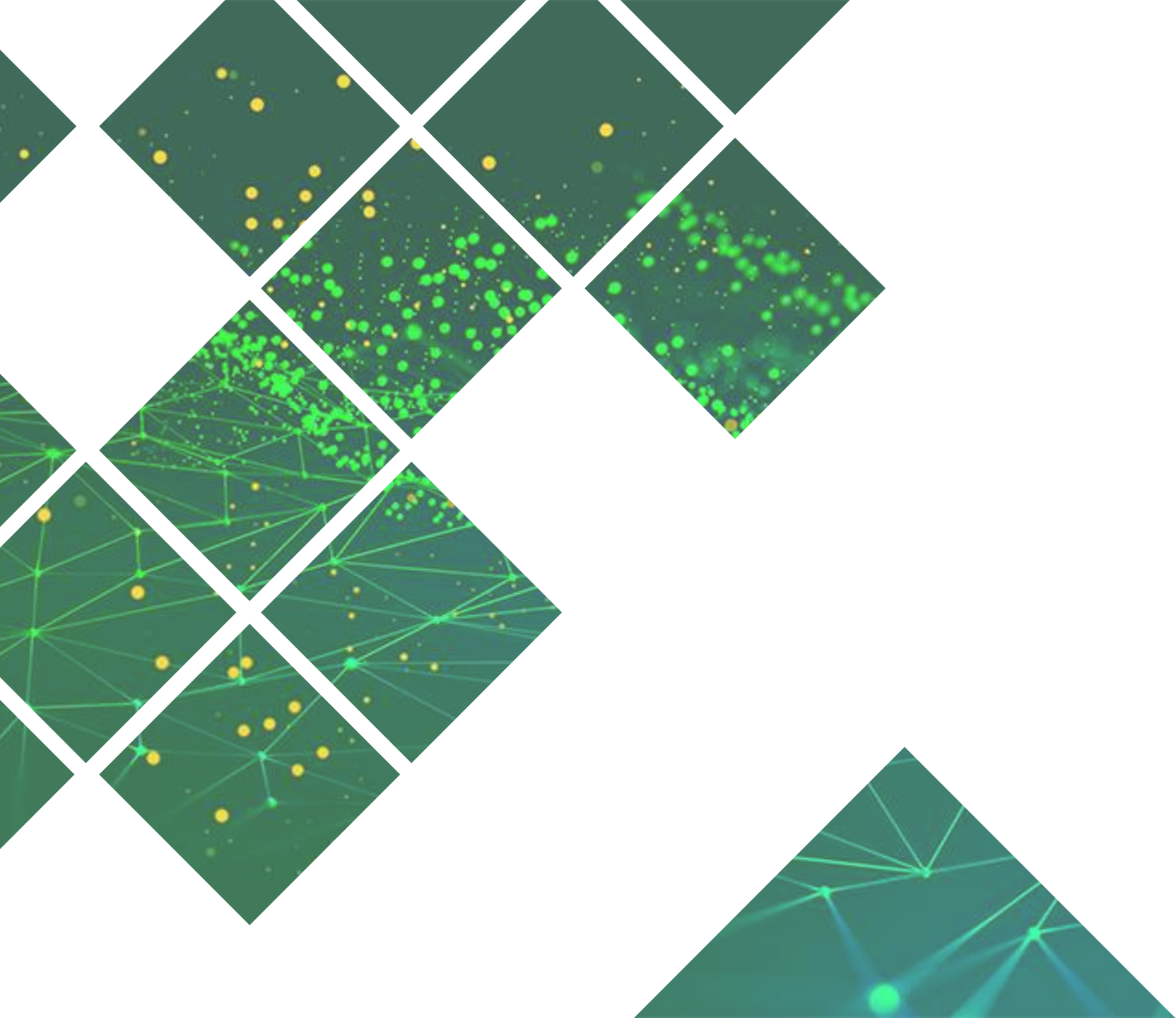
YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

Want know more about SEC Change and Modifications?
Why not listen to our Modcasts?!

Available for download on our [website](#) or listen on [LinkedIn](#)



Thank you for attending

Next meeting:
Tuesday 18 June 2024