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DP254 'Changes to GFI Arrangements'

Modification Report

Version 0.1

09 Oct 2023

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Sasha Townsend from the Data Communications Company (DCC). The DCC are obligated to provide a Testing Service known as Great Britain Companion Specification (GBCS) Interface Testing For Industry (GFI). This service essentially allows Parties to test how they perceive the GBCS against that of the DCC's interpretation.

The DCC has been informed by its Service Provider that the manufacturer of the GFI Testing Tool can no longer produce the equipment included in the kit due to the lack of necessary hardware materials. Therefore, the DCC can no longer provide any new GFI Testing Tools if requested.

A secondary issue is the DCC's contract with their Service Provider is due to end during November 2023, and at present there is no alternative provider in place to ensure this service is continued.

Therefore, the DCC will no longer be compliant with their SEC obligations to provide a Testing Service. Secondly, Parties will not be able to complete any testing desired to ensure their GBCS interpretation matches that of the DCC's.

The DCC has proposed that the modification should seek views on the potential removal of requirements relating to the provision of new GFI Testing Tool requests and/or amend the requirements for maintenance for existing GFI Testing Tools.

2. Issue

What are the current arrangements?

The DCC is required to provide a Testing Service known as GFI. GFI is a tool which was initially developed prior to DCC Go-Live to enable Testing Participants to test the interoperability of Devices as part of End-to-End Testing and is now an enduring Testing Service made available to Parties upon request.

The GFI Testing Tool allows Parties (predominantly Device Manufacturers) to test that their interpretation of the GBCS aligns with the DCC's. It provides a replicated production environment allowing testing of physical Devices over a ZigBee network. The software of the tool is updated for each version of GBCS which is implemented as part of a SEC Release.

What is the issue?

The DCC has been informed by its Service Provider that their manufacturer of the GFI Testing Tool can no longer produce the equipment included in the kit due to the lack of necessary hardware materials. Therefore, the DCC cannot currently provide any new GFI Testing Tools if requested. Furthermore, the contract between DCC and its Service Provider to provide support for GFI is due to end in November 2023.

What is the impact this is having?

The DCC will be non-compliant with its SEC requirements to provide GFI. Firstly, by not meeting SEC Section H14.52 'GFI Testing' which states "*The DCC shall provide GFI Testing Tools to Testing*

Participants upon request to support GFI Testing.” Then beyond support expiration, the DCC will also be non-compliant with obligations to provide the service overall.

This means that Parties needing to test their interpretation of the GBCS against that of the DCC’s would be unable to do so, and formally will no longer have access to the maintenance of the Testing Tool as of late November 2023.

Impact on consumers

There is no known impact on consumers.

3. Assessment of the proposal

Areas for assessment

Users of the GFI Testing Tool

This proposal will investigate which industry Parties regularly use or are reliant on the GFI Testing Tool within their business processes, and what requirements will need to be maintained if the tool was no longer available.

Alternate Testing Procedures

Manufacturers have indicated they utilise this test tool frequently and would need any solution to provide similar functionality. This will be assessed as part of the Refinement Consultation.

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Will there be any operational impacts?
SMKI PMA	We do not believe this has any SMKI impacts
SSC	We do not believe this has any Security impacts
TABASC	Will any technical aspects of DCC System testing be affected?
TAG	What impact will be felt by industry if the GFI Testing Tool is removed?

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	09 Oct 2023
<i>Presented to CSC for initial comment</i>	<i>17 Oct 2023</i>
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>17 Oct 2023</i>
<i>Modification discussed with Working Group</i>	<i>01 Nov 2023</i>
<i>Refinement Consultation</i>	<i>Nov 2013 – Dec 2023</i>
<i>Modification discussed with Working Group</i>	<i>Jan 2024</i>
<i>Modification Report approved by CSC</i>	<i>Jan 2024</i>
<i>Modification Report Consultation</i>	<i>Jan 2024 – Feb 2024</i>
<i>Change Board Vote</i>	<i>Feb 2024</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
GBCS	Great Britain Companion Specification
GFI	GIT For Industry
GIT	GBCS Interface Testing
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group