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# MP083 'Change Coordination'

## Modification Report Version 0.2

## About this document

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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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This document also has one annex:

- **Annex A** contains the redlined changes to the SEC required to deliver the Proposed Solution.

## Contact

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## 1. Summary

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This Draft Proposal has been raised by Tom Rothery from the Data Communications Company (DCC).

As Users are not currently required to notify the DCC of their planned changes, the DCC only has a partial view of planned changes that can impact the Smart Metering network. Without a full view of all change, the identification, triage and management of Incidents is more challenging to execute, and consequently incident resolution can take longer.

To mitigate risk this risk, MP083 will require DCC Users to provide the DCC with planned System changes. The DCC will then use this information to create a risk heatmap, allowing users to avoid updates to their systems on days deemed as high risk. Additionally, the DCC will provide further support on these high-risk days.

## 2. Issue

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### What are the current arrangements?

#### DCC led changes

Under SEC obligations, the DCC informs Users of planned changes to DCC Systems. This is primarily performed through the Forward Schedule of Change. This tool ensures that the DCC provides timely information on Planned Maintenance and is designed to explicitly minimise the impact of changes on DCC Users. It is also intended to help DCC Users plan their own changes without disruption from Planned Maintenance or changes to DCC Internal Systems.

#### User led changes

Users also update their Systems as needed but are not required to give the DCC any notification, this normally happens with some Users as a courtesy.

### What is the issue?

Changes to Users Systems, Devices and processes can have a direct impact on DCC Systems and the overall Smart Metering network. When changes are made to Systems, new Devices are introduced, or updates are made to existing Devices using DCC Systems, there is a risk that these activities may impair the performance of the DCC Total System. In extreme cases, there is a possibility that the Services could be disrupted.

As Users are not currently required to notify the DCC of their planned changes, the DCC only has a partial view of planned changes that can impact the Smart Metering network. Without a full view of all change, the identification, triage and management of Incidents is more challenging to execute, and consequently incident resolution can take longer.

In accordance with SEC Section H8.4, the DCC is required to provide Parties, Registration Data Providers (RDPs) and the Technical Architecture and Business Architecture Sub Committee (TABASC) with a schedule of each month's Planned Maintenance. This schedule sets out:

- the proposed Maintenance activity;
- the parts of the Services that will be disrupted (or where there is a Material Risk of disruption) during each Maintenance activity;
- the time and duration of each Maintenance activity; and
- any associated risk that may subsequently affect the return of normal Services.

In accordance with SEC Section H8.8, where the DCC is proposing to make a change to DCC Internal Systems the DCC shall also:

- undertake an assessment of likely impact on Parties and RDPs that may arise because of the Maintenance;
- consult with Parties, RDPs and the TABASC regarding any Material Risk of disruption;
- provide Parties and RDPs with the opportunity to be involved with any testing of the change to DCC Internal Systems prior to implementation; and

- undertake an assessment of the likely impact of the change on the security of the DCC Total System, Smart Metering Systems, and the Systems of Parties and RDPs.

There are no such obligations in the SEC for DCC Users to provide such information. This means the DCC does not have a full view of changes and the potential impacts they may have on DCC Systems.

As a Licenced body, the DCC has a duty to fulfil its Licence Objective<sup>1</sup> and the SEC Objective<sup>2</sup> of maintaining an efficient and economical service, to enable the Smart Meter roll-out and to provide ongoing Smart functionality for end consumers. A holistic, transparent view of both DCC-led and User-led changes can help maintain a smooth service for all Users in the future and support the DCC in fulfilling its objectives.

## What is the impact this is having?

### What Incidents have already been encountered?

The DCC has already encountered Incidents resulting from the lack of communication of planned User led changes. Two such incidences and their impacts are noted here.

#### *Firewall*

A User made changes to their firewall, which blocked the message route between the Data Service Provider (DSP) and the User. No messages were received by the User from the DSP, and the DSP had a build-up of 1,500,000 messages, which impacted the performance of the network and the operations of all Users. The DCC had to reallocate its resources to investigate the issue, which meant that the Business Continuity Disaster Recovery (BCDR) activity that was planned for that day had to be postponed.

#### *Meter data management*

A User deployed a new meter data management system with adverse repercussions. The launch caused the generation of erroneous messages by the User's systems, which flooded the DCC System. The 'message storm' caused an interruption to the DCC service, impacting all Users' ability to commission smart meters. Users had to both rebook installations, which meant taking slots from other planned installations, and install SMETS1 assets instead.

### What is the impact of doing nothing?

As described in the examples above, interruptions are already happening. The DCC is concerned that, without greater transparency of User change, there will be even more disruption ahead. The complexity of the Smart Metering estate is growing with new market entrants, firmware versions, Devices and functionality, which may have a disproportionate impact on the Smart Metering network.

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1 The First Enduring General Objective of the Licensee is to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code and where relevant the Retail Energy Code.

2 The second General SEC Objective is to 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.

### 3. Solution

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#### Proposed Solution

The DCC will establish and maintain a Code Required Document; the 'User System Change Reporting Methodology'. This document will define:

- the types of User System changes that Users are required to report to the DCC
- the information that a User is to report to the DCC, how they will do this and timescale for reporting this information; and
- a mechanism by which the DCC shall report on the risk all changes are expected to have on the DCC Systems.

The DCC will create a risk heat map from this information and make it available through the Self-Service Interface (SSI). Users will be expected to refrain from making changes to their systems on days deemed as high risk. The DCC will also provide additional support on these high risk days.

## 4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

### SEC Parties

| SEC Party Categories impacted |                               |   |                       |
|-------------------------------|-------------------------------|---|-----------------------|
| ✓                             | Large Suppliers               | ✓ | Small Suppliers       |
| ✓                             | Electricity Network Operators | ✓ | Gas Network Operators |
| ✓                             | Other SEC Parties             | ✓ | DCC                   |

All SEC Parties are expected to be impacted by this Proposal. DCC Users will be obligated to provide information of System changes and the DCC will be required to produce a heat map and provide addition support on high-risk days.

### DCC System

There is expected to be no impact on the DCC Systems as a result of this SEC Modification. The Risk heat map on the SSI is established outside of this SEC Modification.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

### Consumers

Consumers are impacted by the examples provided by the Proposer. In some instances, DCC User system changes have led to consumers having to rebook meter installations or having SMETS1 Devices installed instead of SMETS2 Devices.

### Other industry Codes

There are no expected impacts on other Industry Codes.

### Greenhouse gas emissions

There are no expected impacts on greenhouse gas emissions.

## 5. Costs

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### DCC costs

There are no DCC System costs associated with this modification.

### SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

### SEC Party costs

Costs to SEC Parties will be sought during the Refinement Consultation.

## 6. Implementation approach

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### Recommended implementation approach

SECAS is recommending an implementation date of:

- **25 February 2021** (February 2021 SEC Release) if a decision to approve is received on or before 11 February 2021.

This modification will not require any lead time for DCC System changes. DCC User lead times will be sought during the Refinement Consultation.

## 7. Assessment of the proposal

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### Observations on the issue

#### Views of the DCC

The DCC is supportive of changes to the SEC to ensure transparency of DCC User planned changes and coordination of these changes. The DCC has also been working closely with SEC Parties to identify a solution for sharing User-led change.

#### Views of SEC Parties

Four comments were received in the Development Stage. These were from two Large Suppliers, one Small Supplier, and one Other SEC Party. In general, the comments are unsupportive of this Proposal, and the Parties believe that this issue lies in the DCC System rather than with DCC Users. One Large Supplier is in support of this proposal and can see the benefits of coordinating DCC User changes at a high level. The Proposer has provided further clarification and rebuttal to each of the comments received. Full details can be found [here](#).

#### Views of Panel Sub-Committees

The Operations Group have been working with the DCC, prior to this Draft Proposal, to establish and address this identified issue. The Operations Group are happy for the Draft Proposal to proceed.

#### Views of the Change Sub-Committee

The Change Sub-Committee Agreed that there is a clear issue to be addressed. However, there are some considerations to be taken in developing a solution and key questions that they would like answered in the Refinement Process. These are as follows:

- In the examples provided by the Proposer, how would the DCC User information enabled the DCC to prevent this from happening?
- Is this a DCC System resilience issue?
- As DCC Users are already required to submit Service Request forecasting to the DCC, what additional information would be required of DCC Users?

### Solution development – Add in as discussion happens

Summarise how the solution has developed over time.

Group discussion points into section headings and evolve these as the modification is discussed at different groups and consultation. Consider using questions as sub-headings.

For example, if the SSC discussed SMKI keys, use the topic of 'SMKI keys' as a heading and note the SSC's views. As the issue is discussed at the Working Group and/or consultation, add those views in to the topic. Do not section conversation by group i.e. don't have TABASC section and SSC section, keep by topic.

### **Support for Change – Add in as discussion happens**

Discuss any views of the Working Group, Sub-Committees or consultation responses in looking at the business case or views as to whether or not they support the solution.

This section can be broken down by Group i.e TABASC, WG, SSC. Any responses received to the Refinement Consultation relating to support should also be captured here.

### **Views against the General SEC Objectives**

#### **Proposer's views**

#### **Industry views**

Can be completed post Working Group and updated post Refinement Consultation.

## Appendix 1: Progression timetable

Use this section to set out what we intend to do to progress the change. That may range from straight to Panel for report to go to TABASC during development to flush out the solution. This section will need to be kept up to date as the Mod evolves.

| Timetable                                              |            |
|--------------------------------------------------------|------------|
| Event/Action                                           | Date       |
| Draft Proposal raised                                  | d mmm yyyy |
| Presented to CSC for initial comment                   | d mmm yyyy |
| Presented to CSC for final comment and recommendations | d mmm yyyy |
| Panel converts Draft Proposal to Modification Proposal | d mmm yyyy |

## Appendix 2: Glossary

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

| Glossary |           |
|----------|-----------|
| Acronym  | Full term |
|          |           |
|          |           |
|          |           |