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MP183 ‘Post Commissioning Obligations Reporting’ November 2022 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard (AB)	SECAS
Joey Manners (JM)	SECAS
Elizabeth Woods (EW)	SECAS
Mike Fenn (MF)	SECAS
Rachel Black (RBI)	SECAS
David Walsh (DW)	DCC
Patricia Massey (PM)	BEAMA
Julie Brown (JB)	British Gas
Alex Hurcombe (AH)	EDF
Amy Cox (AC)	EDF
Daniel Davies (DD)	ESG
Martin Bell (MB)	EUA
Kelly Kinsman (KK)	National Grid Electricity Distribution
Ralph Baxter (RBa)	Octopus Energy
Jamie Flaherty (JF)	Ofgem
Audrey Smith-Keary (ASK)	OVO Energy
Mafs Rahman (MR)	Scottish Power
Robert Johnstone (RJ)	Utilita

Overview

Issue

The Smart Energy Code (SEC) currently requires the Data Communications Company (DCC) to report on failures in the Post Commissioning process for Smart Metering Equipment Technical Specification (SMETS) 2+ Devices. The DCC is required to provide reporting to the Panel, the Security Sub-Committee (SSC), its Service Users and the Communications Service Provider (CSP).

Because the Post Commissioning Obligations require Suppliers to successfully execute several Service Request Variants (SRVs) related to updating the Security Credentials, one of the criteria for Devices to ‘pass’ Post Commissioning is that the right number of relevant SRVs have been sent and subsequent ‘successful’ Responses received.

Devices can therefore be identified as 'failing' Post Commissioning if there is a breakdown in the process pathway even though the correct Certificates have been placed on the Device and it is communicating successfully.

The DCC is required to raise an incident for every failing Communications Hub Function (CHF), which the CSP then has to investigate. DCC Users also waste time and resource investigating Devices which have actually completed Post Commissioning.

Ultimately the issue leads to inaccuracy of reporting and reputational damage to the industry.

Proposed Solution

The DCC will still report on the successful execution of Certificate-related SRVs, but these by themselves will no longer be a criterion for pass/fail of Post Commissioning Obligations. The DCC will instead look at the end result (are the certificates correct) and were they updated within the seven-day Post Commissioning window, with data on the count of SRVs helping to show the reasons for failures.

As part of the solution, the DCC will update its current reporting suite to show the 'in-life' Certificate health of all Commissioned Devices.

The required changes to the SEC are the same as the last time this was brought to the Working Group, however some suggestions were made for the DCC to investigate further logic in its reporting. The logic that has been applied is a three-step check:

- Do the Party details held within the certificate match the expected Party for the Device?
- Is this Party a known DCC User?
- Have the certificates been cycled Post Commissioning?

These checks will be carried out on certificates in Known Remote Party (KRP) and Device Certificate slots and will be combined with existing reporting logic on the number of relevant SRVs sent and the presence of correct Certificates in the remaining slots.

If Certificates are not correct and the requisite SRVs haven't been sent within seven days, the Party is reported to have failed its Post Commissioning Obligations.

Working Group Discussion

A Working Group member (MR) queried whether this was a reporting change or a functionality change. SECAS (MF) advised this is a reporting change, and the member (MR) queried how Device Certificate slots would be interrogated if not with additional Service Requests. SECAS (MF) advised that at the March 2022 meeting the Working Group noted that the current reporting doesn't distinguish between SRV 6.15.2 'Update Security Credentials (Device)' messages for 'keyAgreement' and 'digitalSignature', and the Working Group requested that the DCC investigate whether this could be included.

The DCC and SECAS concluded that as this level of data is not available to the DCC without extensive system changes it should not be included within the scope of this modification. If there is a business case for allowing the DCC to have this functionality, then it should be raised as a separate modification.

Another Working Group member (JB) noted that a modification is due to be raised to tackle Smart Metering Key Infrastructure (SMKI) mismatches for Device Certificates. The solution to this

modification may provide opportunities for additional data which could be included in the Post Commissioning reporting in future. SECAS (MF) agreed to monitor the new modification for potential added value.

Next Steps

The following actions were recorded from the meeting:

- SECAS (MF) to issue a Refinement Consultation.
- The DCC to continue its work to combine the reporting logic for the solution (estimated completion January 2023).