SEC
Smart Energy Code

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MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

July 2023 Working Group – meeting summary

Attendees

Attendee	Organisation
Alison Beard	SECAS
Ben Giblin	SECAS
Bradley Baker	SECAS
Elizabeth Woods	SECAS
Kev Duddy	SECAS
Mohammedanwar Sumro	SECAS
Rachel Black (RB)	SECAS
Abhijit Pal	DCC
Christopher Thompson	DCC
David Walsh	DCC
Robin Seaby	DCC
Sharon Armitage	E.ON
Alex Hurcombe	EDF
Amy Cox	EDF
Martin Bell	EUA
Stuart Blair	Northern Power Grid
Joey Manners	Octopus
Ralph Baxter (RBa)	Octopus
Audrey Smith-Keary	OVO Energy
Mahfuzar Rahman	Scottish Power
Jeff Studholme	Smart Meter Assets
Tom Woolley	SMS PLC
Shuba Khatun	SSEN

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided a summary of the issue, Potential Solution, and Refinement Consultation responses.

Issue

- Meter Operators (MOPs) and Meter Asset Managers (MAMs) can become DCC Users in the User Role 'Registered Supplier Agent (RSA)'
- Only Suppliers are currently able to deploy and activate Firmware
- Registered Supplier Agents (RSAs) are authorised to maintain the Supplier's meters but unable to maintain Device Firmware

Potential Solution

- 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.

Refinement Consultation responses

- Five responses
    - None who thought the modification should be approved.
    - None agreed with the implementation approach.
- Implementation costs range from £0 to £500,000.
- Lead time – none to 8 months.
- A respondent noted it would negatively impact SEC Objective (a)[1].
- Security concerns of RSAs potentially distributing faulty Firmware onto a Supplier's estate.

DCC Preliminary Assessment Summary

- **Cost (Design, Build & PIT)**
    - £151,000 - £350,000
- **Implementation**
    - Release timeline to be confirmed in Full Impact Assessment.
    - Full Impact Assessment - £13,127
    - Expected to be completed in 40 Working Days
- **Impact**
    - Only DSP component impact and cost are included in this PIA.
    - Possible impact on S1SPs, CSPs and DCC Data Science and Analytics (DS&A) team will be included in the Full Impact Assessment (FIA).

[1] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Working Group Discussion

SECAS (EW) provided an overview of the issue, potential solution, Refinement Consultation responses, and DCC Preliminary Assessment summary.

A Working Group member (MB) sought confirmation as to reasoning to remove Device Manufacturers and DCC Other Users from the scope of this modification. SECAS (EW) noted it would add more complexity and advised it was explored for DCC Other Users or Device Manufacturers to become a RSA in their own right. The Working Group member (MB) added that they would like confirmation of the reasoning. SECAS (EW) noted it would gather the details and feedback to the member offline.

SECAS (EW) asked Working Group members if there was anything else which SECAS has to do before proceeding to request an Impact Assessment.

A Working Group member (RBa) noted that although they appreciated the Proposer's enthusiasm for this proposal, they believed this had been a challenge for the modification process. They noted that the Panel Chair is looking into modifications clogging up the process. They continued that the Refinement Consultation responses do not show any support and no Suppliers have shown support, either by attending this forum, nor responding to the Refinement Consultation. They added, this was an example of high costs with a highly debatable Proposed Solution and no support for the change nor for paying the costs.

SECAS (AB) noted that under Code Administration Code of Practice (CACoP) rules and obligations, the Proposer has the right to progress their modifications. A Working Group member (RBa) acknowledged this, however noted that they believed that SECAS needed to look into a better process of handling modifications, like this one, and take on learning points. SECAS (AB) noted this and advised that the Proposer (TW) has an option to withdraw or progress the modification, and SECAS is obligated to facilitate the Proposers decision for progression. A Working Group member (RBa) agreed however noted this is an issue and significant concern to Panel.

The Proposer (TW) advised that this modification is to help address the three million meters which are SMETS but are not functioning as SMETS. They added that doing so, would assist in protecting assets in industry and address poor performing portfolios. The Proposer (TW) expressed their frustration that there are issues with the whole Smart Metering estate in terms of firmware, however he believed that members of the Working Group were indicating that there was no problem to fix. The Proposer (TW) added that their organisation has created a smart meter health checker due to Suppliers not handling the full extent of the issue.

A Working Group member (JS) agreed with the Proposer and Working Group member (RBa), however for there to be a modification, they believed that a need for the change should be demonstrated. They queried that if this was such a large issue as the Proposer claimed to be, why was this not raised by a Supplier. A Working Group member (JS) added to which, when this modification went out for consultation, none of the Supplier respondents were supportive of this modification nor indicated a desire for this service. A Working Group member (JS) highlighted that there are issues with Firmware and a mixed bag of which Suppliers are managing it well, however noted this is more of an Operations Group (OPSG) issue rather than a need for a modification. A Working Group member (SB) agreed there should be more controls in place of the process.

The Proposer (TW) advised they issued a poll outside of the SEC process and had a list of Suppliers who were keen on this option, however when asked to attend a Working Group call, they did not engage. A Working Group member (JS) noted that they don't need to attend the Working Group however they could fill in a consultation or email SECAS to note their interest, which is easy enough to do if they were that interested in this modification.

The Working Group Chair (KD) asked that as Working Group members noted this modification is not ready to request an Impact Assessment, what more is needed to be done by SECAS in order to bring it to a point where we can request an Impact Assessment. A Working Group member (JS) advised that they believed that members do not think we should spend any money on this.

A Working Group member (RBa) agreed that they do not believe that industry should spend £13,000 on an Impact Assessment. SECAS (AB) advised that the Change Board will make the final decision on requesting an Impact Assessment.

The Proposer (TW) advised that they had offered to pay for this change however have been told it is not possible. SECAS (AB) advised this would only be possible if it was eligible as an DCC Elective Service, unfortunately as this change would require changes to DUIS, it is not a viable option to be a DCC Elective Service. SECAS (AB) added that even if the Proposer (TW) wanted to pay for the Impact Assessment and implementation costs, there are other factors to consider, including costs to other SEC Parties who will be impacted by this change. A Working Group member (SB) noted that if the Proposer is willing to pay for Industry changes, including SEC Parties internal changes, then they believed that they should be able to.

The Proposer (TW) stated that they were not looking to make this service a commercial offering but wanted to protect their assets and other Meter Asset Providers (MAPs) assets. The Proposer (TW) added, if this was £500,000, their organisation would be more than willing to pay it and get this moving forward, which they believed pales in comparison to non-functioning Smart Meters being decommissioned and removed.

A Working Group member (ASK) queried if the costs of asset removals could be gathered in order to build a business case for requesting the Impact Assessment. The Proposer (TW) agreed to provide what information they could and believed that it would be helpful to have feedback from The Community of Meter Asset Providers (CMAP) as well. A Working Group member (JS) advised within CMAP, there has been a range of costs collated for SMETS1 and SMETS2 estates, to better understand the cost of an unnecessary removal of assets, which has been fed back to Department for Energy Security and Net Zero (DESNZ), Office of Gas and Electricity Markets (Ofgem) and the Strategic Working Group. Working Group member (JS) added that they would like to pick this up offline with the Proposer (TW) and SECAS (EW) in order to build a stronger business case regarding removals.

A Working Group member (RBa) advised they believed that there is no clear needs statement for this change and therefore does not think this modification will ever be in a position to request an Impact Assessment. They added that the scope has been reduced to such an extent that this is only assisting in a limited part of the process, which still requires Suppliers to do the rest.

SECAS (AB) noted that there is still three million meters on walls which are not operating in smart mode, which need a firmware update and the Proposer (TW) is trying to provide a solution to Suppliers who do not have the resource to do this themselves. A Working Group member (JS) noted that only a percentage of those three million meters are known to not be able to have the firmware upgraded. They added that the relevant metric is 'how many meters across DCC are on unsupported firmware?', although that number might be less if the Firmware had been updated historically.

The Proposer (TW) advised they can provide the number of meters across DCC that are on unsupported firmware, which can be broken down by Supplier. SECAS (AB) advised it would not be appropriate to have it broken down, just the total figure will do.

A Working Group member (JS) suggested that there should be interaction between this forum and the OPSG as they believed that this is an operational issue, although added that Suppliers should be resourced properly. SECAS (AB) advised that OPSG gets regular updates from SECAS Change team.

A Working Group member (SB) queried if Firmware upgrades were done from an RSA level and on behalf of multiple Suppliers, would this reduce the stress for Northbound traffic as it's a singular channel. The DCC (RS) advised this would not have impact on Communications Service Provider (CSP) capacity as it is all contained within Data Service Provider (DSP).

The majority of Working Group members did not believe this modification was ready to progress to request an Impact Assessment and did not recommend that an Impact Assessment should be requested.

Next Steps

The following actions were recorded from the meeting:

- SECAS to confirm directly to the Working Group member why Other Users were removed from scope; and
- Working Group member (JS), the Proposer (TW) and SECAS (EW) to discuss offline about costs of an unnecessary removal of assets and updated in the Modification Report; and
- SECAS to discuss next steps with the Proposer.