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MP212

'Housekeeping changes 2022'

Modification Report

Version 1.0

17 August 2022

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

This document is the final Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

Contents

This document has one Annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

Contact

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1. Summary

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

The Smart Energy Code Administrator and Secretariat (SECAS) maintains a log of typographical errors, cosmetic and other inconsistencies, omissions and other clarifications that are required to be corrected within SEC documentation. Any such instances that are identified by any party and notified to SECAS are placed on the log and are amended at an appropriate point. The Proposed Solution to this modification aims to address all the outstanding issues that are currently identified on the log, and any identified and notified to SECAS while the modification is in progress.

This modification will have no direct impacts on any SEC Party but will give greater clarity and transparency to the SEC Documents. Implementation costs are limited to SECAS time and effort to update the SEC. Implementation is targeted for the November 2022 SEC Release. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

The current SEC Documents have some minor errors which were in the SEC from inception or introduced in via various changes over the years. SECAS maintains a log of these errors, which are either identified by SECAS or notified to SECAS by other parties. The usual process for amending these errors is to add these into a modification that is making changes to the relevant SEC Document. However, sometimes modifications to which these housekeeping amendments have been added are rejected or withdrawn, meaning the housekeeping amendment is not made. In other instances, no modifications making amendments to the relevant documents have been raised.

What is the issue?

This has resulted in a number of these housekeeping errors remaining on the housekeeping log for several years. The type of housekeeping changes are listed below along with the specific amendments that are needed in this modification:

Minor typographical and grammatical errors

This is a compilation of minor inconsistencies such as spelling errors and errors in acronyms. The outstanding errors have been identified by various parties over the last few years.

Inconsistencies introduced by other modifications

Some inconsistencies have been introduced by the implementation of modifications.

- MP138 'DCC Service Testing in ETAD' introduced some new descriptions for some testing methodologies into Section H; these did not align with existing definitions in Section A and need to be aligned to ensure consistency.

- The term ‘Technical Code Specifications’ covers various SEC Schedules and Appendices, otherwise known as SEC Subsidiary Documents. However, the ‘SSI Baseline Requirements Documents’ is a code required document managed by the DCC and was included in this list in error via ‘SECMP0058 ‘Changes to the governance of the Self-Service Interface’.
- Several instances of ‘unique identifier’ need to be updated to ‘Market Participant Identifier’ as result of the changes made by Urgent modification MP185 ‘Additional controls to support the SoLR process’.
- The removal of the clause in SEC Appendix AL 3.15(a) was inadvertently missed as part of MP116 'Service Request Forecasting', and therefore, we are addressing it now.
- The terms ‘enrolled’, ‘suspended’ and ‘withdrawn’, when describing a DCC service flag, needs to be updated to ‘active’, non-active’ and ‘installed but not commissioned’ as a result of changes made by modification MP0077 'DCC Service Flagging'.

SEC documents which cease to apply

There are several sections within the SEC which cease to apply.

- SEC Section X ‘Transition’ 1.5) sets out several sections that ceased to apply once the Smart Metering Implementation Programme (SMIP) has been completed, or after 31 October 2018 (whichever was earlier). The entirety of SEC Section X is not subject to removal, as some clauses will remain in place. Section X1.5 states the following sections are to be deleted following the Completion of Implementation or 31 October 2018:

  > *Section X1.11; Section X2 (Effective Provisions at Designation) except from X2.3(d), X2.7 and x2.8; Section X3 (Provisions to Become Effective Following Designation) except from X3.1 and X3.9; Section X4 (Governance Set-up Arrangements); Section X6 (Transitional Variations); Section X7 (Transitional Incident Management Procedures); Section X8 (Developing CH Support Materials); and Section X10 (Threshold Anomaly Detection Procedures).*

  Also in SEC Section X, Sections X1.11, X4, X6, X7, X8 and X10 will be replaced by ‘[NOT IN USE]’, in line with other Sections within the SEC that are no longer applicable. There will also be revisions to Sections X2.1 and X3.1 and their subsequent paragraphs. The amendment of SEC Section X is captured in the legal text for transparency; however the section contains an automatic deletion clause (X1.5) and therefore a SEC modification is not technically required to amend the section. SECAS has decided to include them into this modification in order to highlight to the industry that these sections have now been updated or removed.
- SEC Appendix AN ‘SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release’ set out the framework for the testing of the BEIS-directed changes included in the release. It also set out the requirements that applied to the development of the November 2020 SEC Release Testing Approach Document (TAD), which presented the testing in more detail. The November 2020 SEC Release went live on 29 November 2020. As such this document is no longer applicable, therefore all text from this Appendix will be removed, and text added stating that the Appendix no longer applies. The Appendix will remain as a placeholder.

What is the impact this is having?

If these corrections are not resolved, the SEC Documents will contain inconsistencies. Although these are minor typographical, cosmetic and alignment inconsistencies, as well as apparent inconsistencies and omissions between different SEC documents, leaving these in could cause confusion for Parties reading these sections.

If these continue to remain, it could make it harder for Parties to comply with these documents and make the documents in question harder to maintain, increasing the chance of further inconsistencies occurring in the future.

Impact on consumers

The issue raised in this proposal does not impact consumers.

3. Solution

Proposed Solution

The Proposed Solution is to correct the minor errors and inconsistencies identified in the SEC Documents.

The legal text can be found in Annex A.

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

There are no direct impacts from this modification. All Parties will indirectly benefit from this modification as the SEC Documents will have greater clarity and transparency.

DCC System

This modification does not impact the DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A ‘Definitions and Interpretation’
- Section C ‘Governance’
- Section F ‘Smart Metering System Requirements’
- Section G ‘Security’
- Section H ‘DCC Services’
- Section J ‘Charges’
- Section K ‘Charging Methodology’
- Section L ‘Smart Metering Key Infrastructure and DCC Key Infrastructure’
- Section M ‘General’
- Section P ‘Production Proving’
- Section T ‘Testing During Transition’
- Section X ‘Transition’
- Section Z ‘The Alt HAN Arrangements’
- Schedule 5 ‘Accession Information’
- Schedule 6 ‘Specimen Form of Letter of Credit’
- Appendix B ‘Organisation Certificate Policy’
- Appendix D ‘SMKI Registration Authority Policies and Procedures’
- Appendix E ‘DCC User Interface Services Schedule’
- Appendix G ‘DCC Gateway Connection Code of Connection’
- Appendix H ‘CH Handover Support Materials’
- Appendix I ‘CH Installation and Maintenance Support Materials’
- Appendix J ‘Enduring Test Approach Document’
- Appendix L ‘SMKI Recovery Procedure’
- Appendix O ‘SMKI Repository Interface Design Specification’
- Appendix S ‘DCCKI Certificate Policy’
- Appendix X ‘Registration Data Interface Specification’
- Appendix Z ‘CPL Requirements Document’
- Appendix AB ‘Service Request Processing Document’
- Appendix AG ‘Incident Management Policy’
- Appendix AI ‘Self Service Interface Code of Connection’
- Appendix AJ ‘SEC Variation Testing Approach Document’

- Appendix AL 'SMETS1 Transition and Migration Approach Document'
- Appendix AN 'SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release'
- Appendix AO 'S1SPKM Compliance Policy'
- Appendix AP 'FOC S1SPKI Certificate Policy'
- Appendix AP 'Secure S1SPKI Certificate Policy'
- Appendix AQ 'SEC Variation Testing Approach Document for the CH&N Arrangements'
- Appendix AS 'ECoS Transition and Migration Approach Document'
- Appendix AT 'SMETS1 Cryptographic Key Management Policy'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Technical specification versions

Due to the approach for managing and updating technical specifications, changes to these documents have been left out of this modification. This is to mitigate the risk of no other changes to that technical specification being made in the corresponding release, resulting in a new sub-version for no material benefit.

Devices

Devices will not be impacted by this modification

Consumers

This modification does not impact consumers.

Other industry Codes

This modification does not impact any other industry Codes.

Greenhouse gas emissions

This modification does not impact greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is two days of effort, amounting to approximately £1200. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

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

SEC Party costs

There are no SEC Party implementation costs associated with this modification.

6. Implementation approach

Approved implementation approach

The Change Sub-Committee (CSC) has approved an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 20 October 2022; or
- **23 February 2023** (February 2023 SEC Release) if a decision to approve is received after 20 October 2022 but on or before 9 February 2023.

7. Assessment of the proposal

Observations on the issue

The CSC reviewed the proposal and agreed it should not be progressed as a Fast-Track Modification. Some members were concerned that due to the large number of legal text changes, it would be beneficial to have a Modification Report Consultation to give the industry further time to review the proposed changes.

8. Case for change

Business case

This modification will only incur the costs from SECAS time and effort and will correct some inconsistencies that have been in the SEC for several years and have not been addressed yet.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that the modification will better facilitate SEC Objective (a)[1] as it will correct errors in the SEC and lead to less confusion or interpretation.

Views against the consumer areas

Improved safety and reliability

The implementation of this modification will have a neutral impact on safety and reliability.

Lower bills than would otherwise be the case

The implementation of this modification will have a neutral impact on bills.

Reduced environmental damage

The implementation of this modification will have a neutral impact on reducing environmental damage.

Improved quality of service

The implementation of this modification will have a neutral impact on quality of service.

Benefits for society as a whole

The implementation of this modification will have a neutral impact on benefits for society.

Final conclusions

This modification addresses many inconsistencies and points of potential confusion or misinterpretation. There are no DCC costs and only a minimal SECAS cost to implement.

Appendix 1: Progression timetable

The CSC determined that this modification should not be approved as a Fast-Track Modification and should instead be progressed to the Report Phase for consultation and vote. Following the Modification Report Consultation, this modification will be presented to the Change Board for vote under Self-Governance on 21 September 2022.

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

Timetable	
Event/Action	**Date**
Draft Proposal raised	12 Jul 2022
Presented to CSC for initial comment	19 Jul 2022
Legal text available for industry comment	Jul-Aug 2022
CSC converted Draft Proposal to Modification Proposal	16 Aug 2022
Modification Report approved by CSC	16 Aug 2022
Modification Report Consultation	*17 Aug – 8 Sep 2022*
Change Board Vote	*21 Sep 2022*

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**
Alt HAN	Alternative Home Area Network
BEIS	The Department for Business, Energy and Industrial Strategy
CH	Communications Hub
CH&N	Communications Hub and Network
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
DCCKI	Data Communications Company Key Infrastructure Certificate
ECoS	Enduring Change of Supplier
ETAD	Enduring Testing Approach Document
FOC S1SPKI	Final Operating Capability SMETS1 Service Provider Public Key Infrastructure
HAN	Home Area Network
S1SPKI	SMETS1 Service Provider Public Key Infrastructure
S1SPKM	SMETS1 Service Provider Key Management
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMIP	Smart Metering Implementation Programme
SMKI	Smart Metering Key Infrastructure
SoLR	Supplier of Last Resort
SSI	Self-Service Interface

Glossary	
Acronym	**Full term**
TAD	Testing Approach Document