

SEC Change Monthly Working Group Meeting

February 2024

Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



Housekeeping

- Please raise your hand
- Please be clear, explain acronyms
- This session will be recorded for minuting purposes, please be courteous!
- Just a reminder that we should be able to have free discussions of ideas



■ Introductions

- When I say your name please:
 - Say hello so we can check your audio is working
 - Which company you are from
 - If you are a Supplier/Network Party/other



■ MP230: Review the SLA for delivery and completion for SMETS1 firmware

Raised by Nick Rodgers from the DCC

MEDIUM

Objectives of the Working Group

REVIEW	The new Proposed Solution
NOTE	The Refinement Consultation responses
AGREE	The next steps

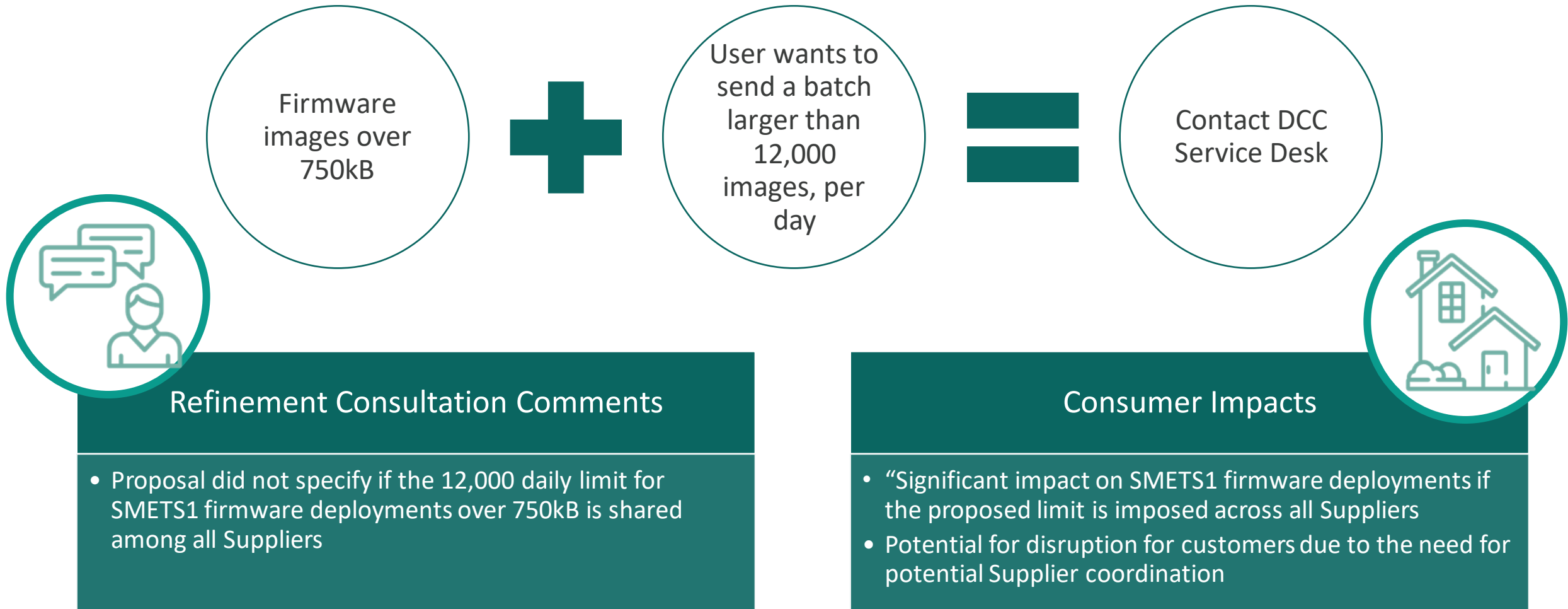
Issue

- DCC System has a limit to the amount of large SMETS1 firmware images that can be processed without causing a degradation of System performance
- Current SLA (5 days) for firmware upgrades cannot be achieved on a large scale with larger firmware images for SMETS1 Devices
- The DCC system can process a maximum of 12,000 larger images a day

Impact

- Users unable to roll out firmware in the volume they would like to be able to

Initial Solution



■ New Solution



- The new solution allows multiple Users to act within the DCC's capacity of 12,000 large firmware images a day
- Allows DCC to manage larger firmware images within their daily capacity
- Formalising a process which is already being carried out by Suppliers and the DCC
- TRTs remain the same for a SMETS1 11.3 update, 5 days
- The existing system would be maintained without adding complexity

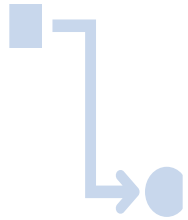
Refinement Consultation key points



- (a) Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.
- (b) Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.
- (c) Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.
- G Facilitate the efficient and transparent administration and implementation of this code.

- May pose challenges for upgrading large SMETS1 fleets
- Removing the SLA is not sufficient, there needs to be some sort of SLA for the larger firmware images
- Concerns on security upgrades
- Support for larger deployments without asking for bandwidth

■ Assessment of Change



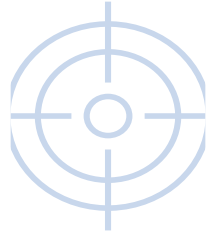
Impacted Parties

- Large Suppliers
- Small Suppliers
- DCC



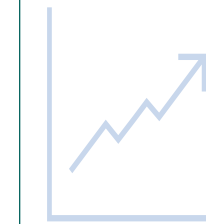
Costs

- SECAS implementation costs only



Target Release

- June 2024 SEC Release
- No Lead time



Benefits

- Operational Relief
- Regulatory Compliance
- Improved efficiency

(b) to enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence;

■ Questions for the Working Group

Does the new Solution allow the DCC to effectively complete larger SMETS1 firmware images?



Does the change in solution constitute an additional Refinement Consultation, or can it progress to the Report Phase?

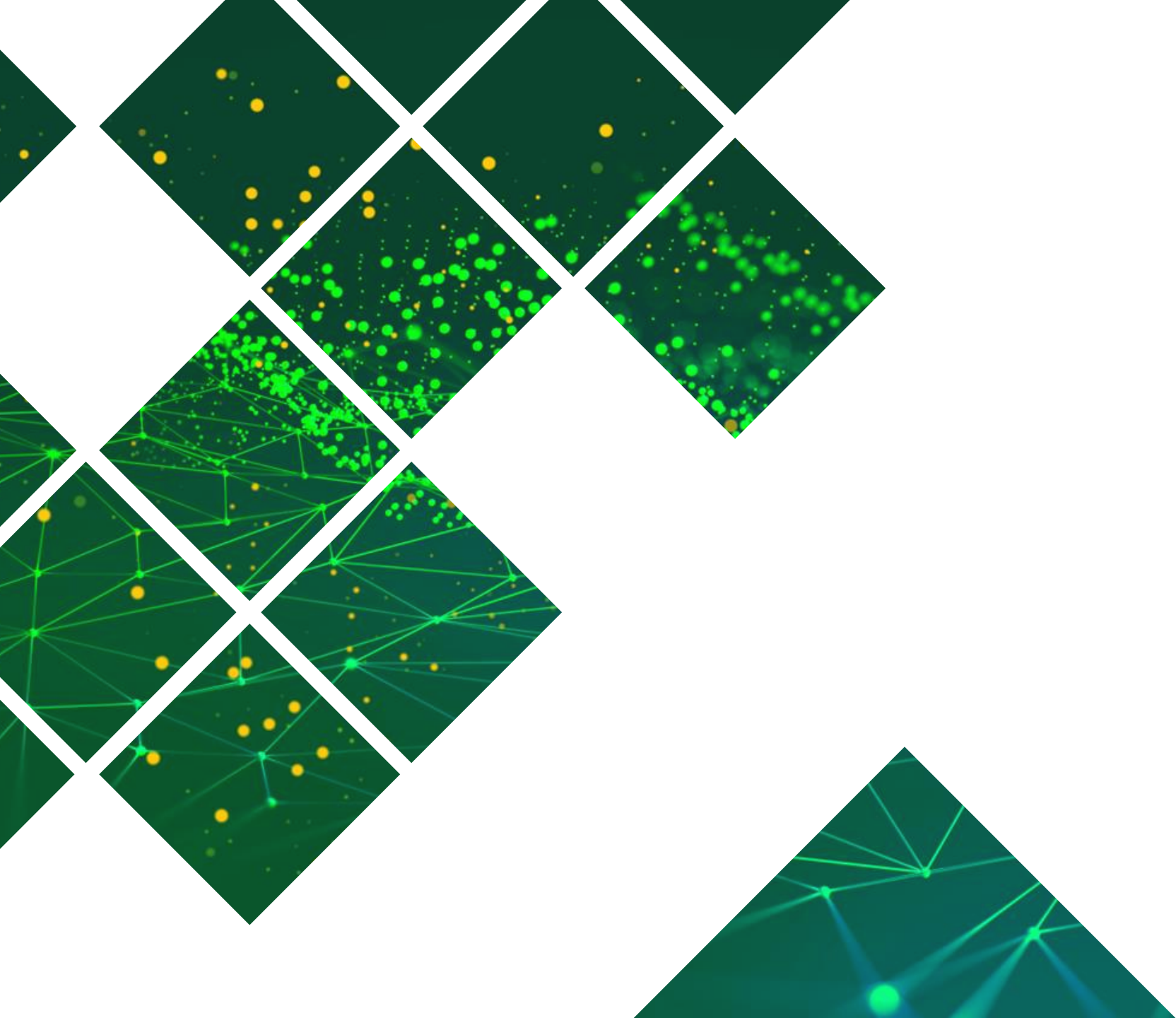


Are there any further comments?



Next Steps





Thank you for listening

Any questions

■ MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'

Raised by Ian Turner from E.ON

MEDIUM

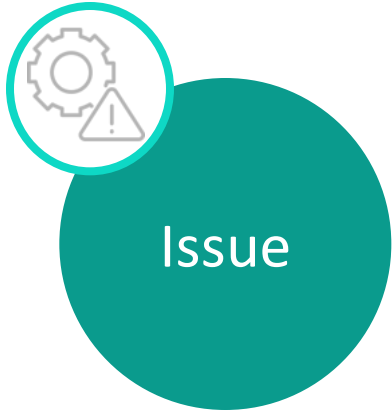
■ Objectives of the Working Group

REVIEW

The DCC Preliminary Assessment Response

AGREE

The next steps



Device Certificate Misalignment

As part of Post Commissioning Obligations, Suppliers and WAN Providers are expected to update the Device certificate. This must be carried out within seven days following installation, via SR 6.17 'Issue Security Credentials' and Service Reference Variant (SRV) 6.15.2 'Update Security Credentials (Device)'. In some instances, the success response is not processed or not received by the DSP, resulting in a certificate misalignment between the Device and the DSP. This renders the Device incommunicable.

Common scenarios for misalignment

A response to SRV 6.15.2 is not processed by the DSP for reasons including:

1. the response is never generated by the Device;
2. the response is lost in transit; or
3. the response reaches the DSP after timeout.

Impact

Parties are unable to communicate with any Device that has a certificate that is misaligned with the DSP Master Key Store. Manual correction has associated costs and is prone to errors.

Business requirements

Business Requirements		
Ref.	Requirement	Responsible for delivery
1	Device certificate misalignment issues are to be resolved to enable the Responsible Supplier to send all Service Requests (SRs) to a Device and for the Device to respond accordingly.	DCC
2	The Proposed Solution must resolve the issue for three scenarios: • Change of Supplier (CoS) when the gaining Supplier cannot rectify the issue through manual intervention. • When the previous Supplier has ceased to trade, and a Supplier of Last Resort (SoLR) has been nominated. • When the Device does not support the process of Service Reference Variant (SRV) 6.24.2 'Retrieve Device Security Credentials (Device)'.	DCC
3	Addressing Device certificate misalignment issues should not require a manual Smart Metering Inventory (SMI) update except in exceptional circumstances.	DCC
4	Device certificate reporting is to be enduring as opposed to being produced on an ad-hoc basis and made available to Smart Energy Code (SEC) Parties.	DCC
5	Device certificate reporting must not duplicate information contained with current Post-Commissioning reporting.	DCC

■ Preliminary Assessment - solution

Predominantly
a DSP solution:

Amend the Certificate Confirmation Scheme (CCS) cycle (a scheme to iterate over different Access Control Broker (ACB) certificate when the MAC verification using first ACB certificate did not work) to consider iterating through all possible ACB KA Key and KA Device Certificate as well.
This will help in identifying the correct Device Certificate – the root cause of this modification.

Allow triggering the CCS in response to

- timeout of SRV 6.15.2;
- Install and Commission process or
- via the SSI/SSMI.

This will help to identify and record the correct Device Certificate in early stage of Install & Commissioning (I&C) process, post-I&C Certificate Update process and via SSI/SSMI during in-life operation.

Continues onto next slide.

■ Preliminary Assessment - solution

Continued

Amend SSI/SSMI to allow an authorised user to initiate CCS using:

- SSI – for a single Device; and
- SSMI – for a set of Devices.

This requires additional role on SSI/SSMI and additional Device Certificate update capability on SSMI.

Amend SSMI to allow an authorised user to set the current certificate(s) for a Device.

Add information to Service Audit Trail (SAT) logs for CCS timeout to indicate which cycle and the stage of the current cycle.

Provide required information to DCC's DS&A team to allow to produce required reports on Device and certificate misalignment.

DCC DS&A Team
DS&A Team will ensure required data is shared with the DCC to generate desired reports. The impact on the analytics system will be assessed as part of the Impact Assessment.

■ Preliminary Assessment – Security impacts



As per
the PA:

This modification requires an amendment to check certificates and update where necessary, this will have a minimal security impact. New roles created will require security oversight, validation and any required documentation changes.

The implementation will be security assured during the implementation phase. This includes reviewing designs, test artefacts and providing consultancy to the implementation and test teams.

A more detailed security impact will be carried out as part of the DCC Full Impact Assessment.

■ SMKI PMA feedback

No concerns but
want to review IA

Queries

- Defect?
- Overlap with Manufacturing Packs?

■ Preliminary Assessment – costs and lead time

IMPLEMENTATION	Six months up to PIT	£161,000 - £360,000
IMPACT ASSESSMENT	40 Working Days	£20,684

■ Questions for the Working Group

Does the Proposed Solution deliver the business requirements?

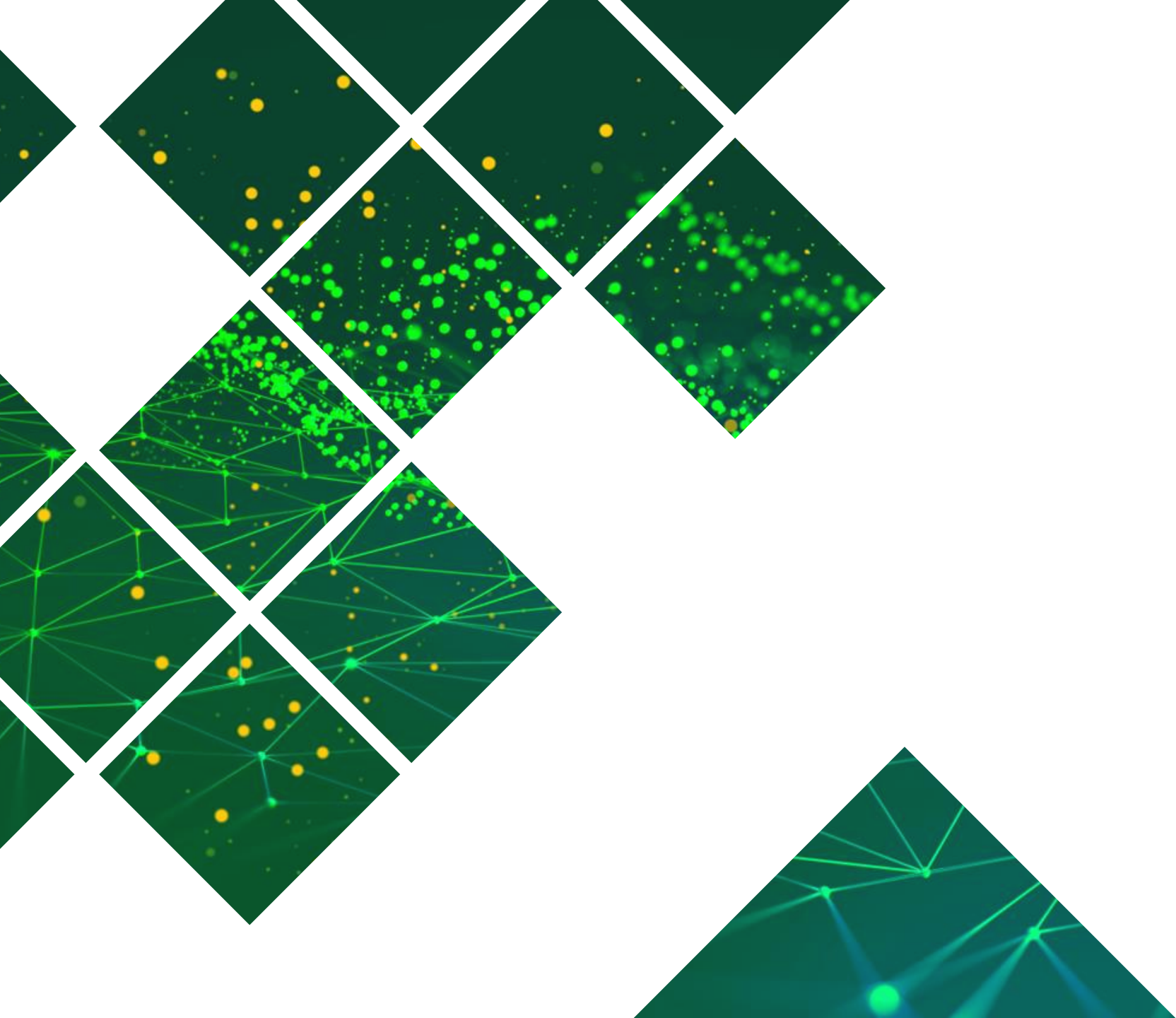


Should the Impact Assessment be requested?



Next Steps





Thank you for listening

Any further
comments?

MP242 'Change to Operational Metrics to Measure on Success'

Raised by Rochelle Harrison from British Gas

VERY HIGH

Issue

- MP122A 'Operational Metrics' (implemented on 25 February 2021) introduced Target Response Times (TRTs) to the Operational Performance Regime (OPR).
- However, the Data Communications Company (DCC) is not currently able to measure TRTs, and instead can only measure Round Trip Times (RTTs).

Solution

- The Proposed Solution is to report on the Success / Failure of an agreed set of SRVs across seven Business Processes.
- During the Refinement Process, the DCC produced a Success / Failure matrix which will be used to determine the Success / Failure of the SRVs relating to the seven Business Processes. The matrix was approved by the Working Group and OPSG.

■ Proposed Solution (Business Processes 1/2)

Install and Commission

- 8.11 Update HAN Device Log
- 6.21 Request Handover of DCC Controlled Device (Update Supplier Certificates)
- 8.1.1 Commission Device
- 8.7.2 Join Service (Join GPF with GSME)
- 6.20.1 Set Device Configuration' (Import MPxN)
- 1.1.1 Update Import Tariff (Primary Element)
- 6.8 Update Device Configuration (Billing Calendar)
- 8.14.1 Communications Hub Status Update Install Success.

Meter Reads

- 4.6.1 Retrieve Import Daily Read Log
- 4.6.2 Retrieve Export Daily Read Log
- 4.8.1 Read Active Import Profile Data
- 4.8.2 Read Reactive Import Profile Data
- 4.8.3 Read Export Profile Data
- 4.10 Read Network Data
- 4.17 Retrieve Daily Consumption Log

Update Device Firmware

- 11.1 Update Firmware
- 11.2 Read Firmware Version
- 11.3 Activate Firmware (Individual SR for each GUID for firmware activation)
- 11.4 Update PPMID Firmware

■ Proposed Solution (Business Processes 2/2)

Change of Supplier (Gain)	Pre-Payment	Top Up Prepayment	Tariff Updates
• 6.23 Update Security Credentials (CoS) • 1.1.1 Update Import Tariff (Primary Element) • 6.8 Update Device Configuration (Billing Calendar)	• 1.6 Update Payment Mode (Payment Mode = Prepayment) • 2.1 Update Prepay Configuration	• 2.2 Top Up Device (Update Balance with positive value)	• 1.1.1 Update Import Tariff (Primary Element) • 1.2.1 Update Price (Primary Element)

■ Proposed Solution (Success/Failure Matrix)

Scenario	DUIS Response Code	GBCS Execution Status	DCC Outcome	Business Outcome
SRV passes DSP validation	I99	N/A	ACK	N/A
SRV fails DSP validation	E1 – E100*	N/A	Success	Failure
Failed to send request to CSP/S1SP	E20	N/A	Failure	Failure
No response from Device	E21	N/A	Failure	Failure
No response from Device at Future Dated execution time (T)	E30	N/A	Failure	Failure
Failed to send request to CSP/S1SP or No response from Device for Scheduled or Future Dated SRV (T)	E31	N/A	Failure	Failure
Failed to send request to ECoS Party (T)	E66	N/A	Failure	Failure
No response from ECoS Party (T)	E67	N/A	Failure	Failure
Response received – GBCS Success	I0	Success	Success	Success
Response received – GBCS Failure	I0	Failure	Success	Failure

Note:

- *excludes the E codes E20, E21, E30, E31, E66 and E67
- (T) indicates messages related to Timeouts
- N/A indicates there is no impact on the outcome

■ Impact Assessment impacts

DCC Impacts

- Creation of a dedicated data-model
- Reporting for Success/Failure relating to 7 business processes
- Report sharing via SharePoint
- Application Support

DSP Impacts

- Addition of Future Dated SRV information within the SAT log entry

■ Impact Assessment Summary

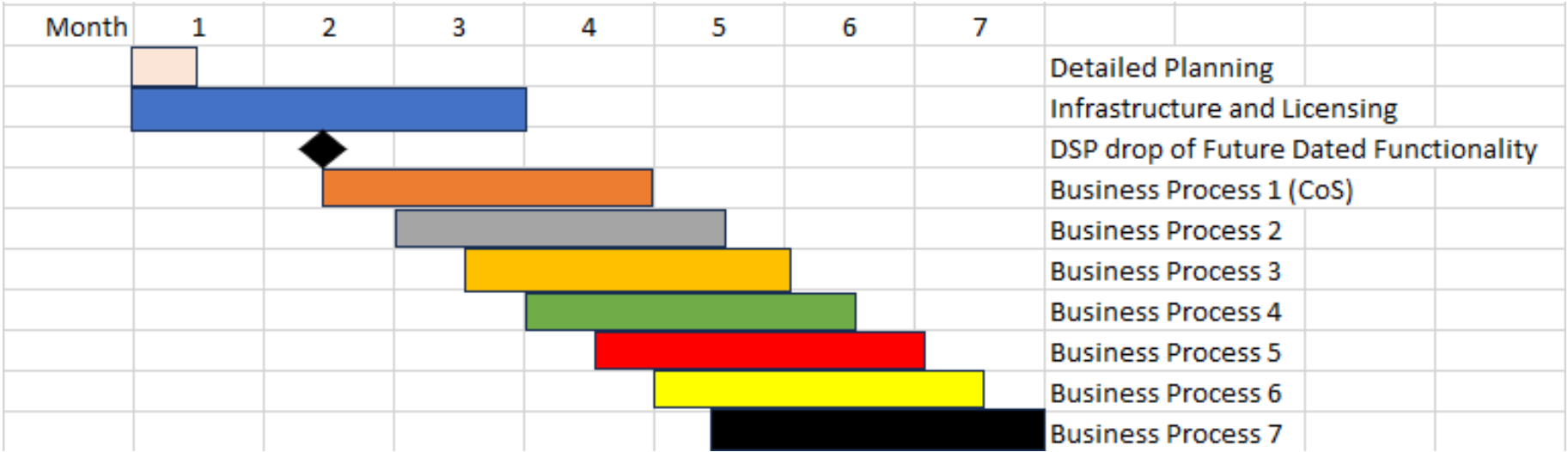
Cost (Design, Build & PIT)

- £262,079 in Design, Build, Testing, and Implementation
 - *£90k Metric Development, £110k Report Production & £62k Additional Future Dated SAT Data*
- £156,000 per annum for Application Support
 - *1 FTE, Additional Infrastructure & Software Licensing costs*

Implementation

- Each business process will be built separately, with a staggered development approach, and will be made available to SEC Parties on the 3rd Monday of each month via SharePoint
- Reports will be made available approximately 7 months from Approval (targeted Oct/Nov 2024)

Impact Assessment Summary



The above gives an indicative plan of the order of work and expected durations for the whole Modification. The Detailed Planning phase would identify the order of Business Process work, along with expected dates for Service User involvement.

■ Questions for the Working Group

Do the benefits of this modification justify the cost?



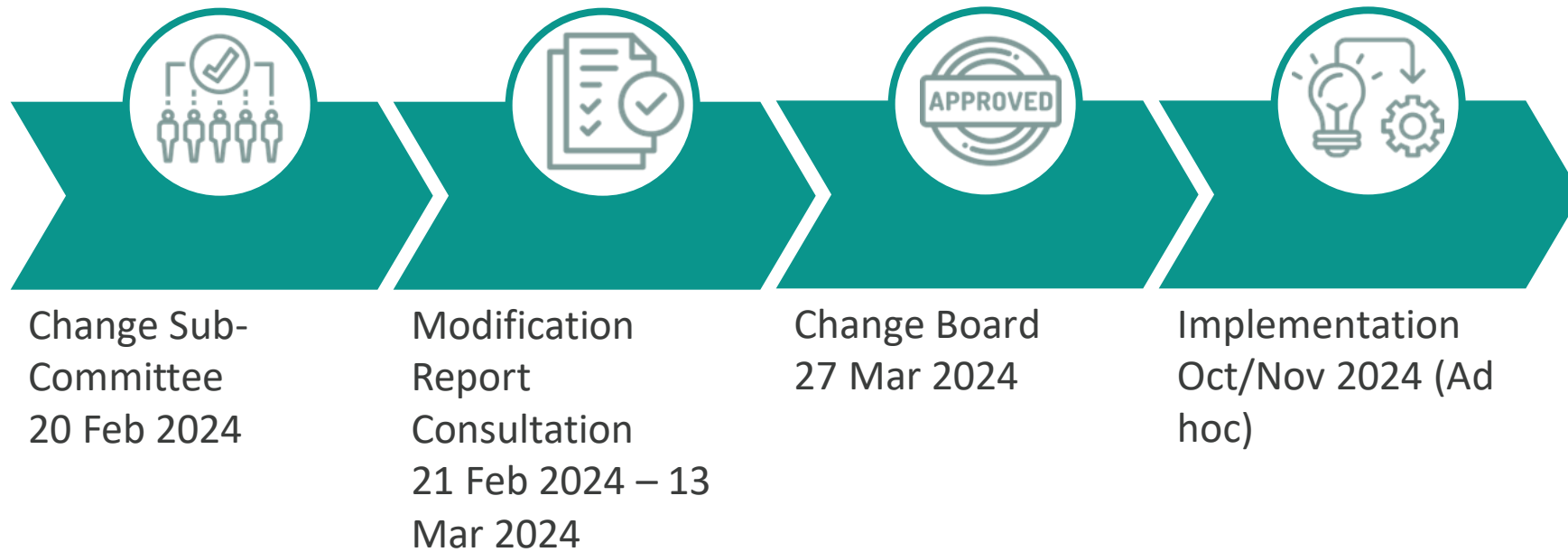
Is the modification complete?

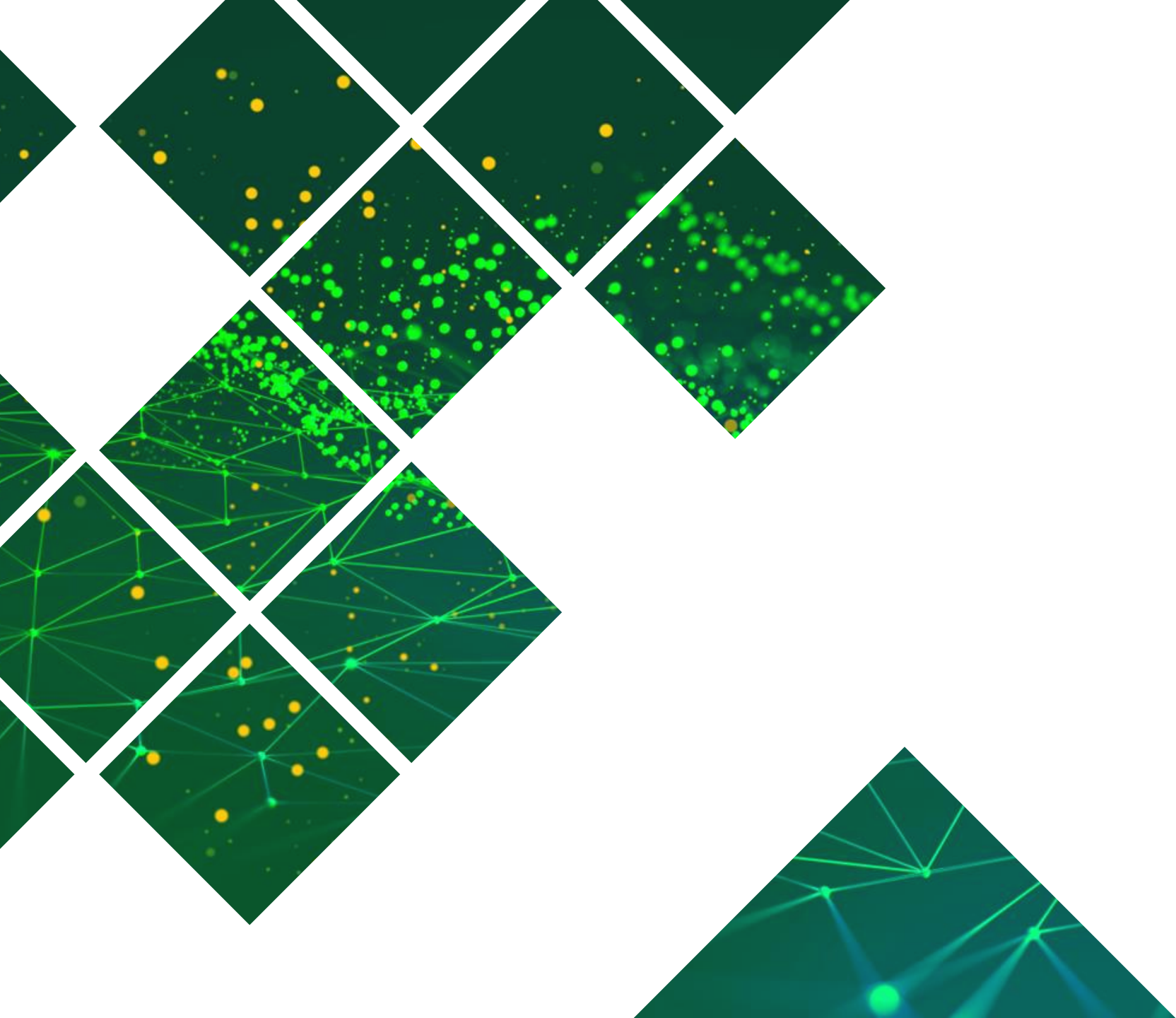


Anything else that needs to be considered?



■ Next Steps



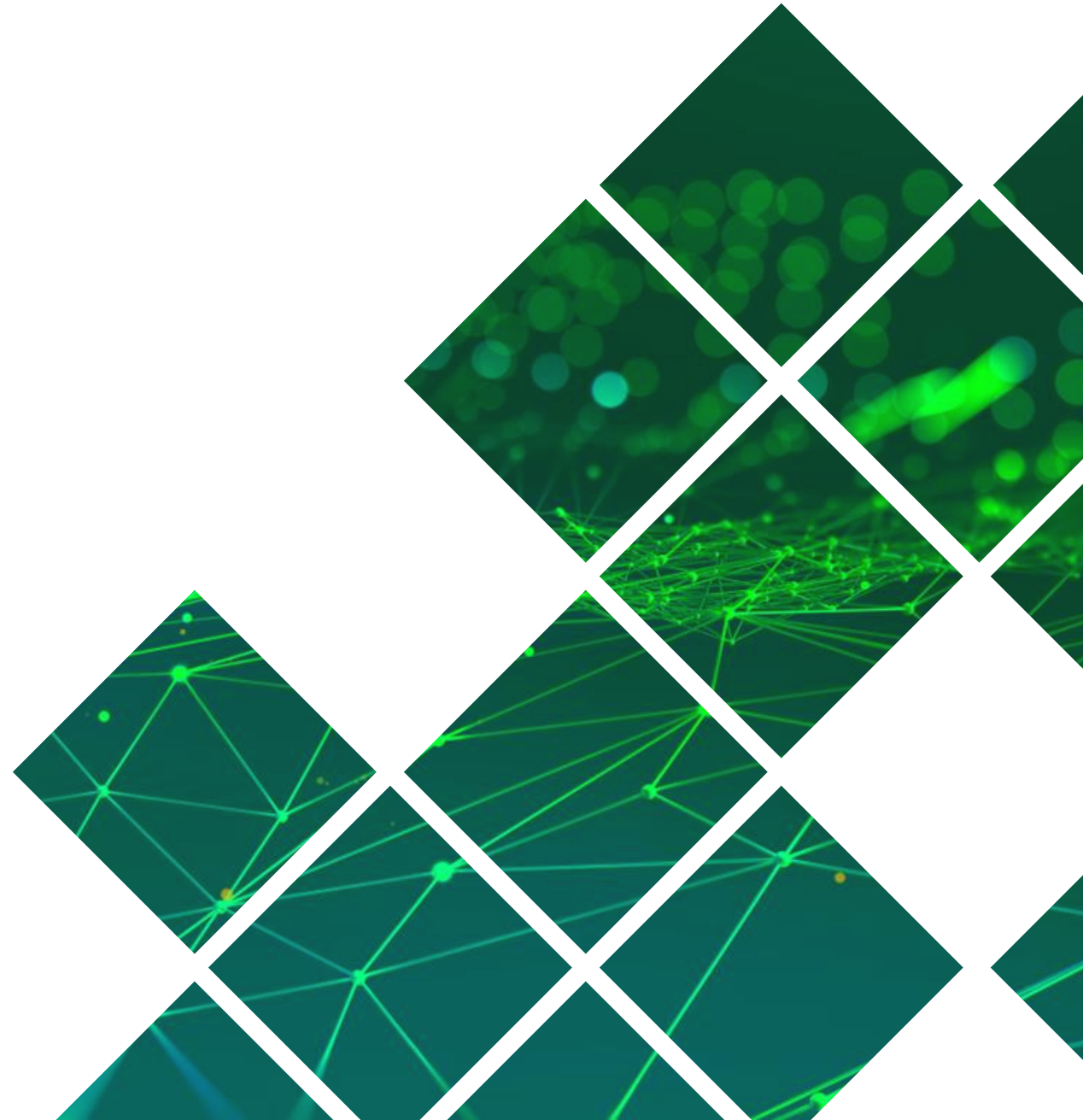


Thank you for
listening

Any questions?

Break

Please return in 10 minutes



MP169: Managing SEC Obligations and the Consumer's right to refuse a Smart Meter

Raised by Emslie Law of OVO

High

■ Objectives of the Working Group

NOTE	The issue
NOTE	The DCC Preliminary Assessment
AGREE	Next steps

Overview

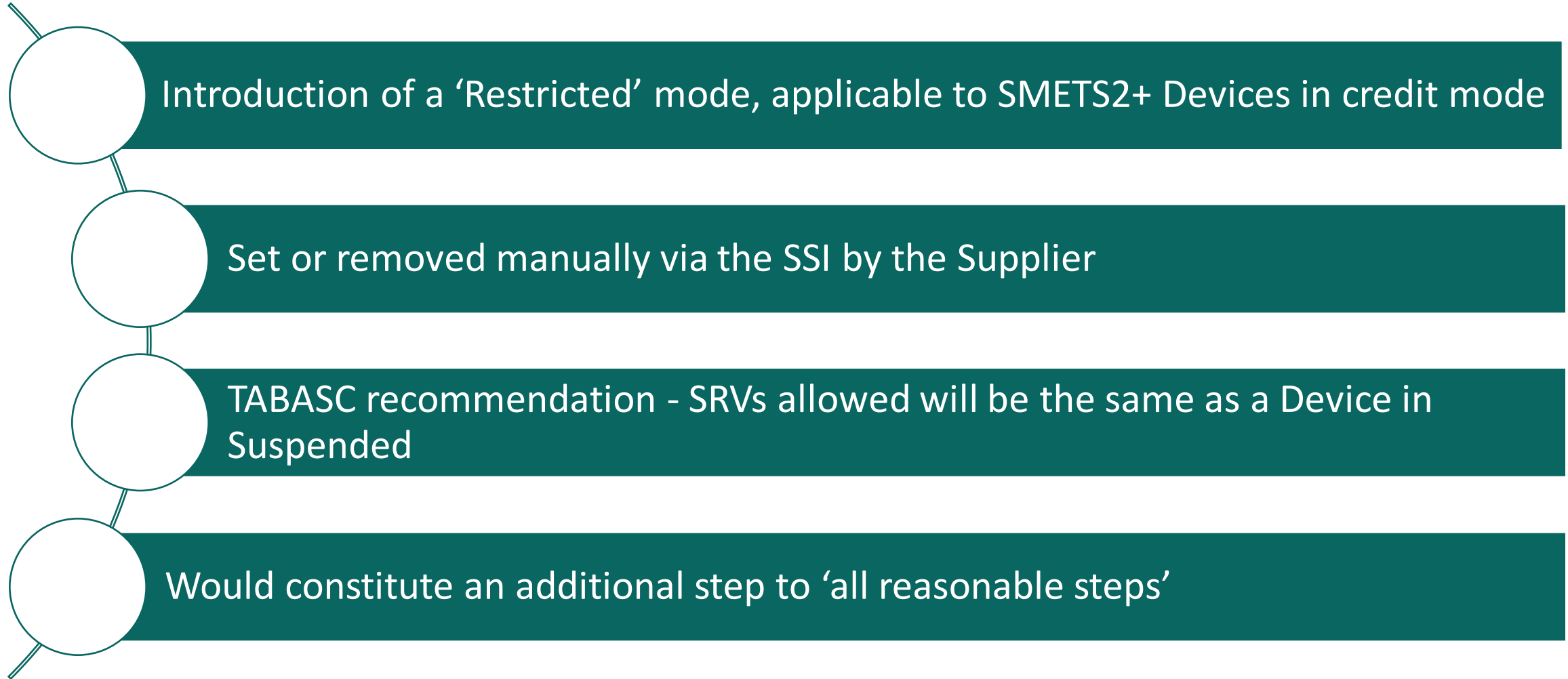
Issue

- Consumers are approaching Suppliers to have Smart Meters installed in 'dumb' mode.
- Suppliers have obligations in the SEC to ensure a Smart Metering System is installed and communicating.
- There is no concept in the SEC for a Device to be installed in 'dumb' mode.

Impact

- Consumers right to refuse a Smart Meter cannot be met as an enduring process unless Suppliers are deliberately non-compliant with the SEC and Supply Licence Conditions.

■ Proposed Solution



■ DCC Preliminary Assessment

Costs of between £351,000 - £750,000 for Design, Build and PIT

Costs of £16,684 to complete the Impact Assessment

Six months of testing needed after Change Board vote

Targeted for inclusion in June 2025 SEC Release

■ Feedback at November meeting

Wording on Citizens Advice and Energy Ombudsman websites

- Current wording suggests it is possible to have a Device in non-smart mode
- Citizens Advice noted that the wording on their website has changed as the rollout has progressed
- Acknowledged that due to the lack of heritage stock, Smart would become the only option
- Without this modification, it would be the case that Smart would effectively be mandatory
- Citizens Advice would need to change messaging about the mandatory nature of the rollout accordingly, which would generate lots of negative attention
- SECAS has suggested alternative wording for the Energy Ombudsman, recommending the use of “smart functionality turned off” is removed

Feedback at November meeting

Licence Conditions

- Suppliers should install Smart Meters at every possible opportunity, however Consumers have a 'right to refuse'
- Mandating Smart Meters is not planned by DESNZ
- Ofgem position: Should not be an obstacle to all reasonable steps and leaving the Device in a Communicative state.

Technical Clarification

- SRVs in scope have been reviewed and remain the same – those allowed will be the same as a Device which is 'suspended'
- PPMID and IHD will be commissioned so they will work for the Consumer even in Restricted mode
- Introduced as new status on the Device like 'Suspended'

■ Feedback at November meeting

Business Case

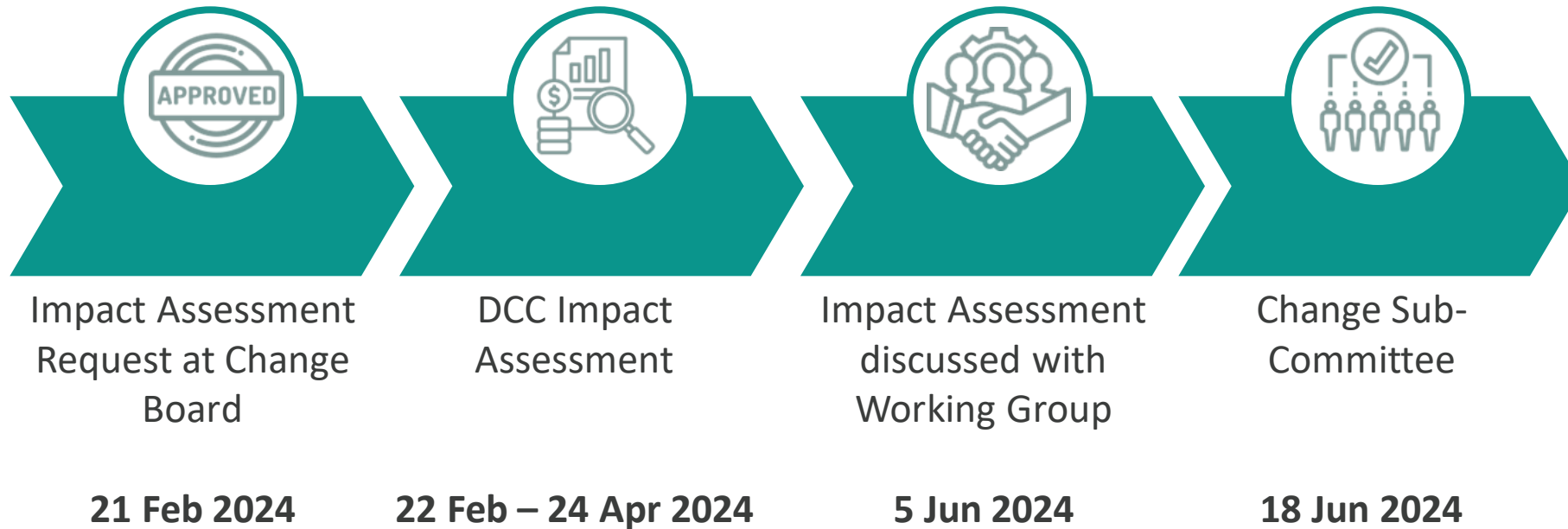
- Unable to measure how many Consumers would choose to have Devices in Restricted mode
- Business case for the modification could be boosted when considering the number of Smart Meters which are removed due to Consumer concerns
- Average cost of dual fuel removal is £500
- PA estimate of £351,000 - £750,000
- £351,000 = 702 dual fuel removals
- £750,000 = 1500 dual fuel removals

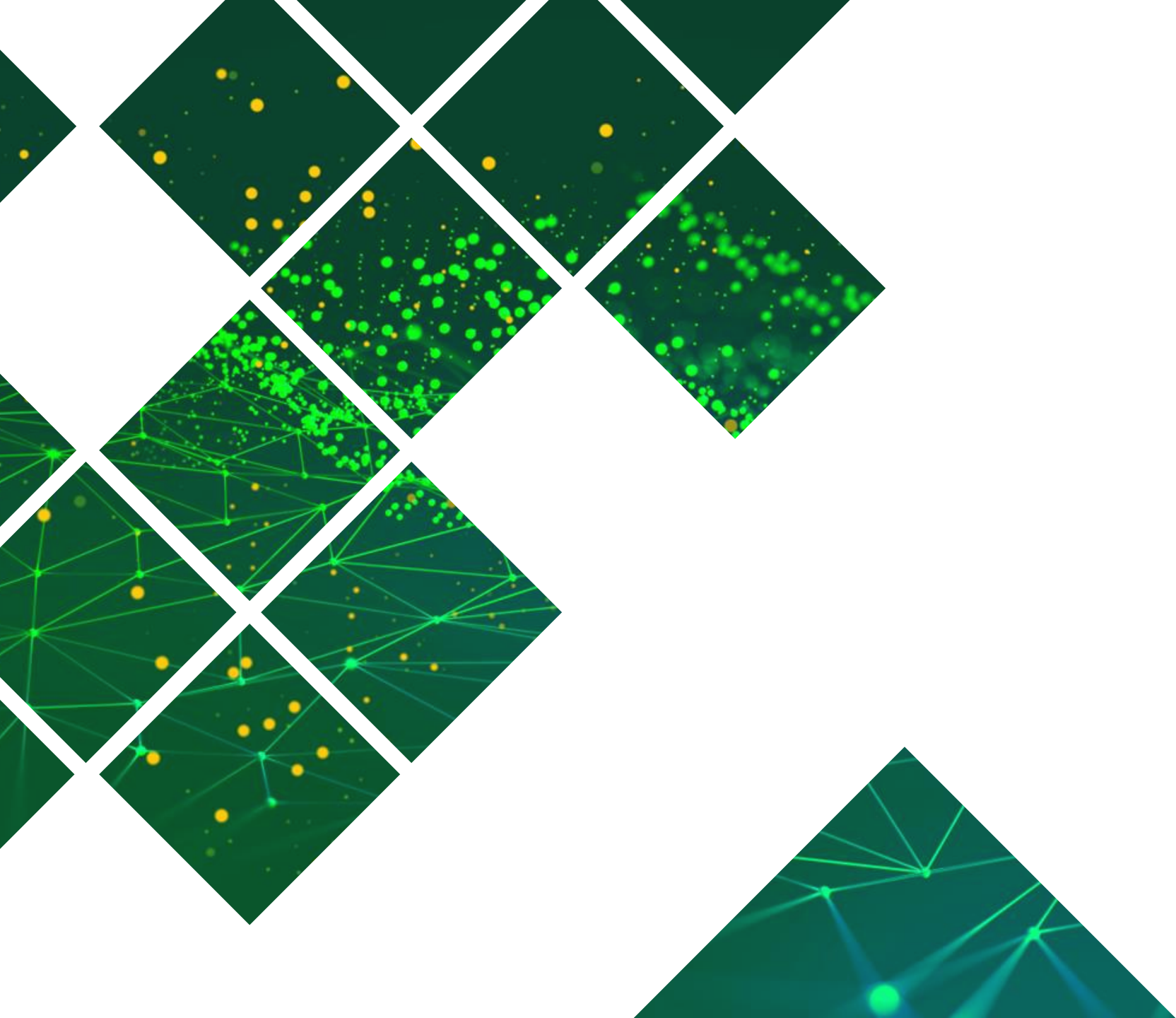
■ Questions for Working Group

Noting the Preliminary Assessment, should the Impact Assessment be requested?

Any further comments?

Next Steps



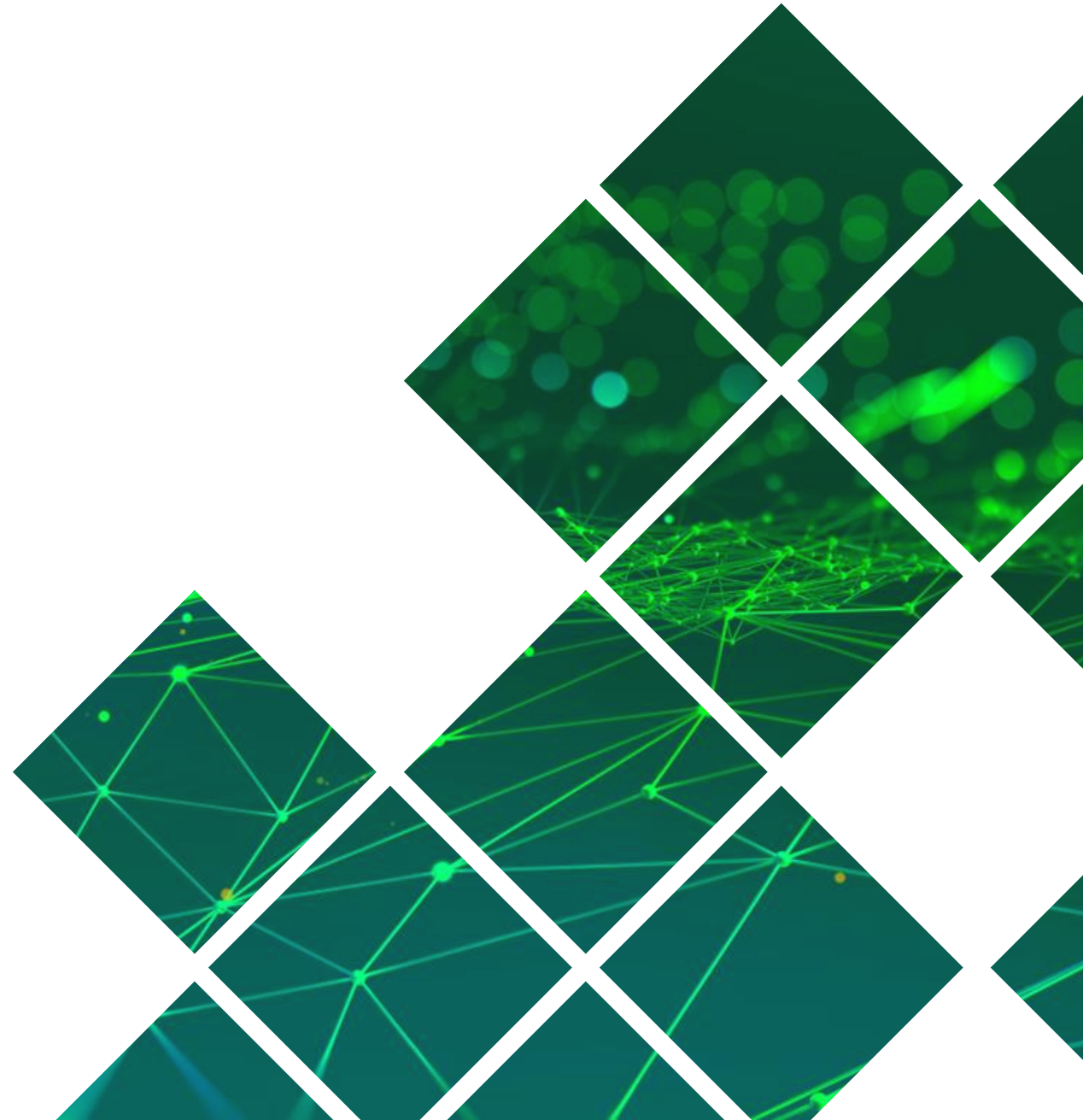


Thank you for
listening

Any questions?

Break

Please return in 10 minutes



■ MP224 'SEC PERFORMANCE ASSURANCE FRAMEWORK'

Raised by Emslie Law from OVO Energy

High

Objectives of the Working Group

REVIEW	The Draft Risk Assessment Methodology
REVIEW	The Proposed Solution
AGREE	The next steps

Issue

- SEC does not explicitly define a Performance Assurance Framework (PAF)
- Panel is expected to manage any performance-related matters as they arise
- Panel's scope is broad and managing matters case-by-case is challenging

2022 Panel Project

- A 2022 project concluded that a risk-based PAF would give Parties confidence obligations were being met
- This was supported by the recent RFI
- Project and RFI both identified issues and instances that may have fallen under scope of a PAF
- Project defined a potential solution – this will need to be further refined and the scope of any PAF defined as part of this modification

How a risk-based PAF would work



How the PAF would work

Risk 001

Interruption to the SMETS2 Communications Hub Supply Chain prevents Parties from being able to install Smart Metering Systems

High Quality
Guidance

Ongoing Risk
Monitoring

Additional information

Types of Party	Suppliers DCC
Risk Category	Consumer Regulatory Financial
SEC Sections	Section F 'Smart Metering System Requirements' Section H 'DCC Services' Appendix I 'CH Installation and Maintenance Support Materials'
Non-SEC Impacts	MHHS rollout SMIP benefit realisation

Risk Scoring

Likelihood Score	3
Impact Score	4
Risk Score	12

Rationale

External factors previously caused component shortages. Impacts likely to be experienced months after realisation. Would allow mitigations to reduce impact.

How the PAF would work

Risk 001

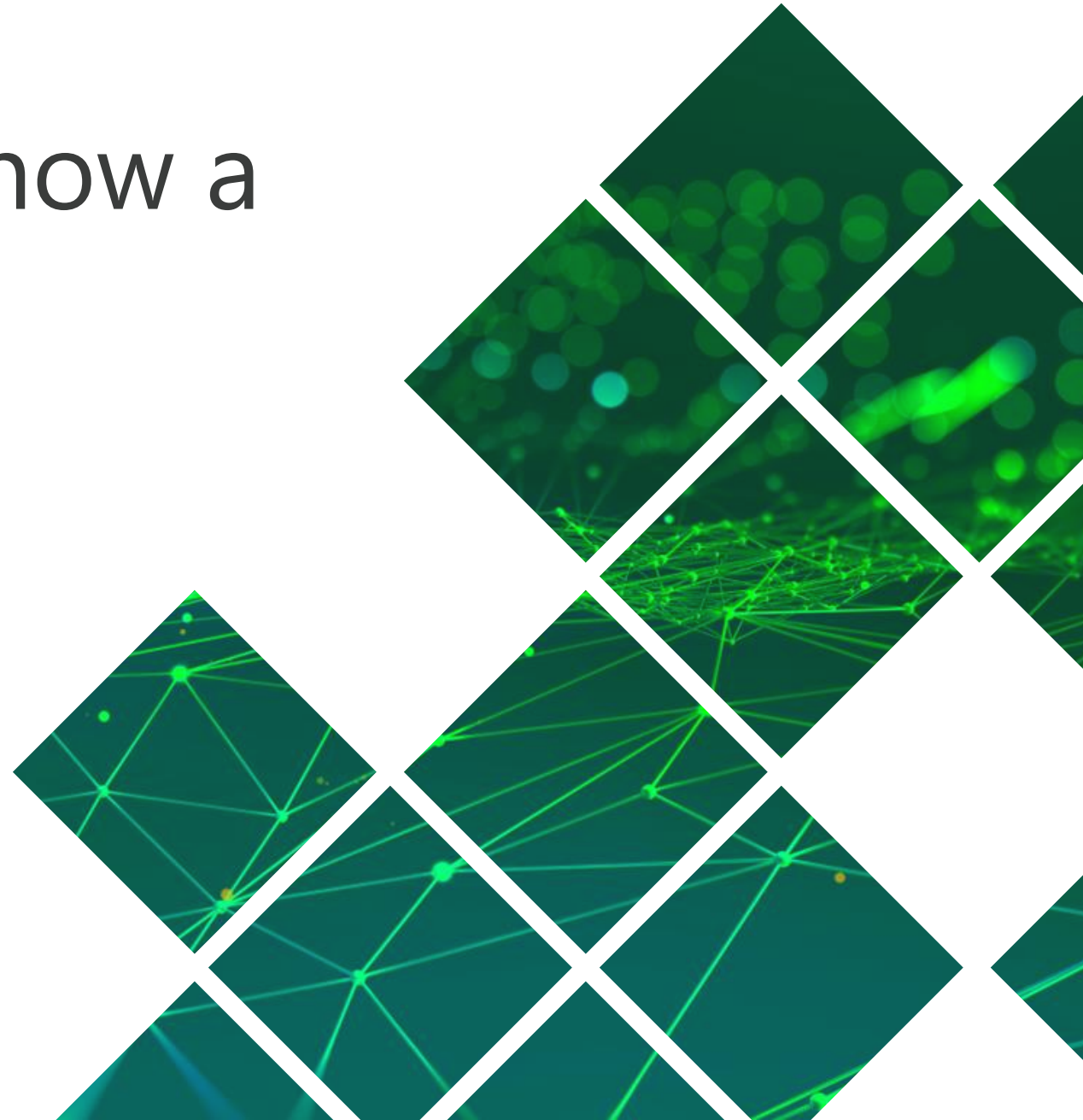
Interruption to the SMETS2 Communications Hub Supply Chain prevents Parties from being able to install Smart Metering Systems

High Quality
Guidance

Ongoing Risk
Monitoring

Risk Drivers		Performance Assurance Technique
001-1	Inaccurate Supplier forecasting results in DCC's Providers being unable to meet demand	High Quality Guidance
001-2	Issues within DCC supply chain result in component shortages	Ongoing Risk Monitoring
001-3	Engineers failing to decommission CHs correctly when removing from site prevents their return to DCC for refurbishment	Self-Assessment
001-4	The DCC Returns process prevents Parties from returning the CHs for refurbishment	Ongoing Risk Monitoring

Any questions about how a
Risk-based PAF would
operate?



■ Composition of the PAB

3.1.1 The PAB members shall comprise:

a) voting members:

- i) ~~two~~ **three** persons elected by the Large Supplier Parties;
- ii) two persons elected by the Small Supplier Parties;
- iii) ~~one~~ **two** persons **s** elected by the Electricity Network **or Gas** Parties
- iv) one person elected by the Gas Network Parties;
- iv) two persons elected by the Other SEC Parties;
- v) one person nominated by the DCC;
- vi) one consumer representative, being either an employee or a nominee of Citizen's Advice or Consumer Scotland;

Change Process

Risk Evaluation
Methodology

Performance
Risk Register

Performance
Assurance
Techniques

Performance
Assurance
Operating Plan

2.3 In relation to the establishment of the Risk Evaluation Methodology, or where the PAB considers that a change to the Risk Evaluation Methodology would further the aims of the PAF and/or further facilitate the SEC Objectives, the PAB shall:

- a) to the extent that it would not compromise the aims and effectiveness of the PAF, issue a draft of the Risk Evaluation Methodology for consultation with Parties, the Authority, Citizens Advice, Consumer Scotland and such other stakeholders as the PAB considers appropriate;
- b) consider any comments received during that consultation and make any amendments to the draft that it considers appropriate in light of those comments; and
- c) approve and adopt the Risk Evaluation Methodology.

■ Reporting requirements

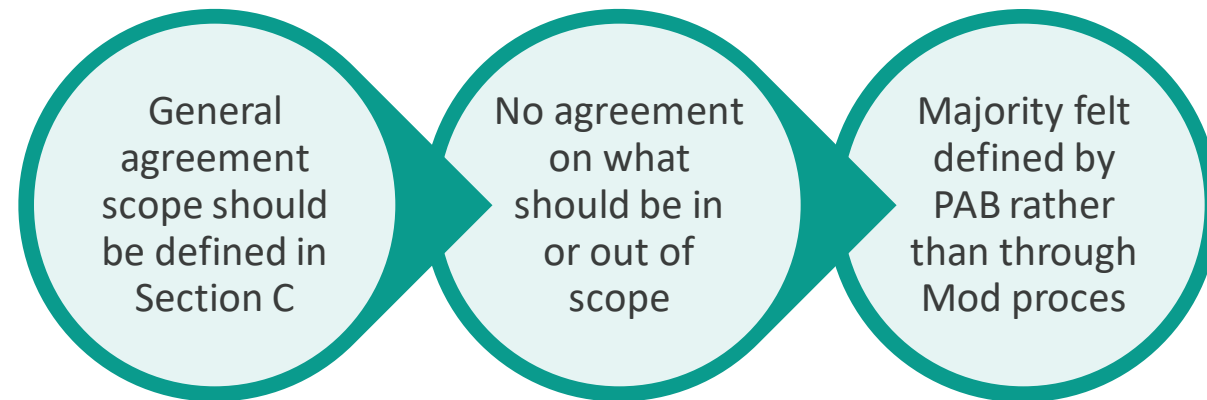
4.4 In relation to detective techniques, the PAB may require Parties to provide Data to the PAB (or the Code Administrator). When considering or making Data requests, the PAB shall:

- a) to the extent practicable, utilise existing reports and Data;
- b) ensure each Data request is (in the PAB's reasonable opinion): (i) necessary for the performance of the PAB's duties; (ii) relevant and proportionate to the purposes and objectives of making such request; and (iii) not overly burdensome on the relevant Parties; and
- c) where the PAB considers (acting reasonably) that a Data request will introduce a substantive ongoing reporting requirement, carry out a consultation with the affected Parties in order to identify and (where reasonably practicable) address concerns of affected Parties.

4.5 Where a Data request is made under paragraph 4.4, each Party subject to the request shall take reasonable steps to ensure that relevant Data is promptly made available to the PAB in an accessible form,

Scope

Section G 'Security'
Section J 'Charges'
Section Z 'Alt HAN Arrangements'
Section N 'SMETS1 Meters'
Section I 'Privacy'



C9.8 The PAB's functions, powers and duties shall not extend to (or permit the PAB to interfere with):

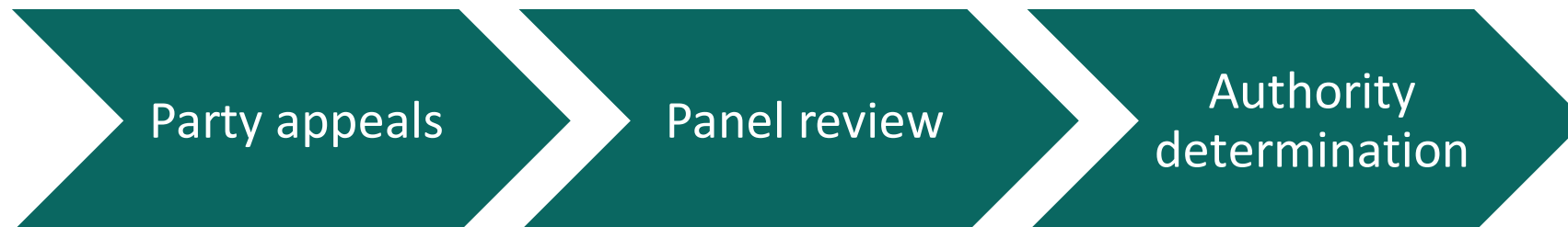
- a) any functions, powers or duties of the Security Sub-Committee, and/or the operation of Section G (Security); or
- b) any functions, powers or duties of the Alt HAN Forum, and/or the operation of Section Z (Alt HAN Arrangements).

■ Appeals

Risk Management Determination



Appeal of PAB Determinations



■ Value added

REC

BSC

UNC

SEC?

Questions for the Working Group

Does this provide comfort of the approach for a risk based PAF?

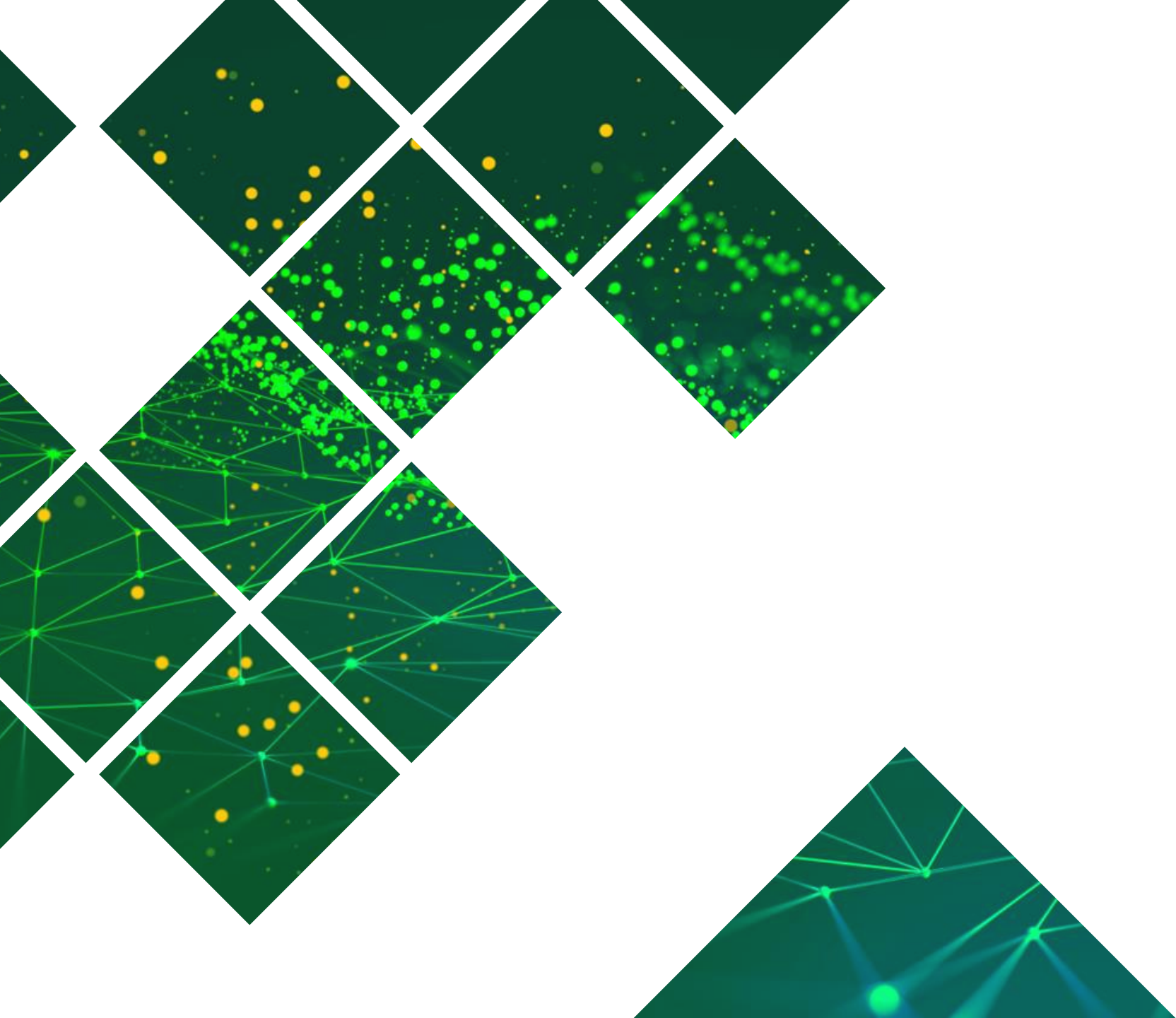


Are there any challenges to the legal text or detail?



Is the modification ready for Modification Report Consultation?





Thank you for listening

Any questions?

■ Any other business

Kev Duddy

■ Modification Improvements Project

1	We will undertake a review of the end-to-end change process and identify improvements.	Mar 24	Interviews have been completed. We are analysing the feedback and will be organising a workshop shortly.
2	We will review the governance of Change, including the purpose of the CSC and Change Board.	Mar 24	Any changes will be informed by the end-to-end review so will be presented in Mar 24.
3	We will ensure that the correct level of technical expertise is present in Working Groups including representatives from the TABASC and other Sub-Committees.	Sep 23	We are already applying this criterion to every modification.
4	We will improve the gathering and development of business requirements.	Oct 23	We are regularly working with the DCC BA team.
5	We will work with the DCC to improve the DCC assessment process and increase visibility and discussion of SLAs at relevant governance groups.	Feb 24	This work is underway and the DCC to delivered an update to the November Panel meeting .
6	We will report the cost savings delivered by challenging the DCC costs.	Feb 24	We are gathering the information.
7	We will introduce a Triage process to reduce the number of open modifications.	Sep 23	This process is in place, and we are passing all new proposals through the process.

■ Modification Improvements Project

8	We will increase 'Critical Friend' challenge to existing proposals.	Oct 23	This is already in place.
9	We will undertake more escalation where there is no progress.	Oct 23	Escalation will be to the CSC in the first instance. This is now in place.
10	We will revisit the proposed change to allow SEC Panel to withdraw modifications.	Nov 23	This has been reviewed and next steps are being considered.
11	We will explore the introduction of a 'bar' which Modification Proposals must hit in order to move through the process.	Mar 24	This will be considered as part of the end-to-end review described in Action 1.
12	We will share and reflect the prioritisation of modifications at all stages.	Sep 23	This is already in place.
13	We will hold a webinar on modifications that have a large impact on industry.	Oct 23	This has been completed.
14	We will raise a SEC Modification to reflect any changes necessary.	As necessary	This will be considered as part of Action 1.

Modifications Improvement Project Workshop

- Dates to be confirmed (end of February/beginning of March)

Privacy Sub-Committee

- Call for nominations – if you, or anyone else, would like to be nominated, please fill out the online nomination form [here](#).
- Deadline is 7 February 2024.

■ AOB – Change Seats

Change Sub-Committee

- Call for nominations will be in early February (start of new term is 1 April)
- Due to the terms being staggered, the seats up for election will be:
 - 1 Large Supplier
 - 1 Small Supplier
 - 1 Electricity Network
 - 1 Gas Network

Change Board

- There are still five vacant seats for those Large Suppliers not currently represented. If you, or anyone you know, would like to be nominated to join the Change Board, please let us know at sec.change@gemserv.com.

YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

Want know more about SEC Change and Modifications?
Why not listen to our Modcasts?!

Available for download on our [website](#) or listen on [LinkedIn](#)

Thank you for listening

The next meeting will be on
Wednesday 6 March 2024