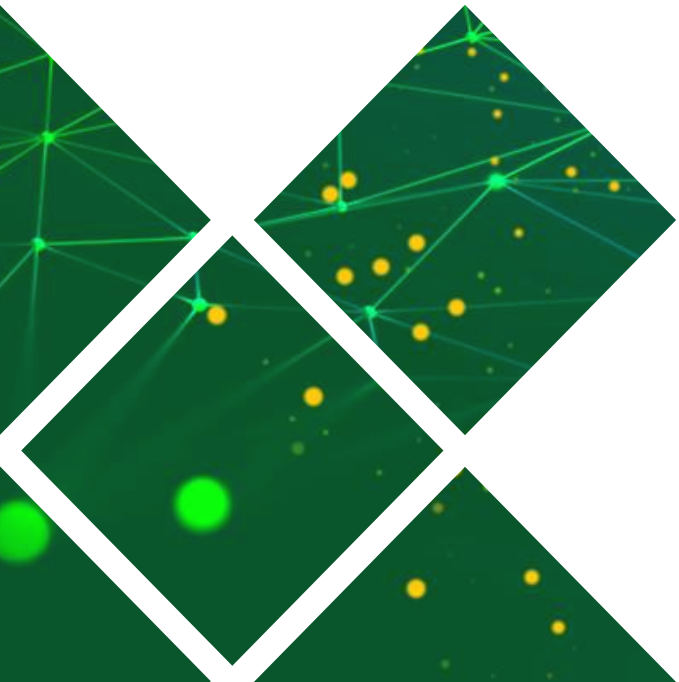


# SEC CHANGE MONTHLY WORKING GROUP MEETING

MARCH 2023



# COMPETITION ACT COMPLIANCE

It is everyone's responsibility to say something

The Chair will move the conversation on



# ■ SECMP0028 'Prioritising System Messages'

Raised by Andy Knowles from Utilita

# Objectives of the Working Group

|        |                                       |
|--------|---------------------------------------|
| REVIEW | The Refinement Consultation responses |
| REVIEW | The relevant workstreams              |
| AGREE  | The next steps                        |

## Issue

- System outages and periods of high Over The Air (OTA) message volumes going through the DCC Systems may result in message queuing and increased processing times.
- Increased processing times for messages driven by Energy Consumers (e.g. Prepayment meter top ups) could cause Consumers to be off supply for longer periods than necessary.

## Solution

- Mechanism in both Northbound and Southbound pathways by which System messages related to time-sensitive processes can be prioritised based on their urgency.

# ■ Relevant prioritisation workstreams

## MP208

- Northbound prioritisation of N56 Alerts for SMETS1 prepayment top ups

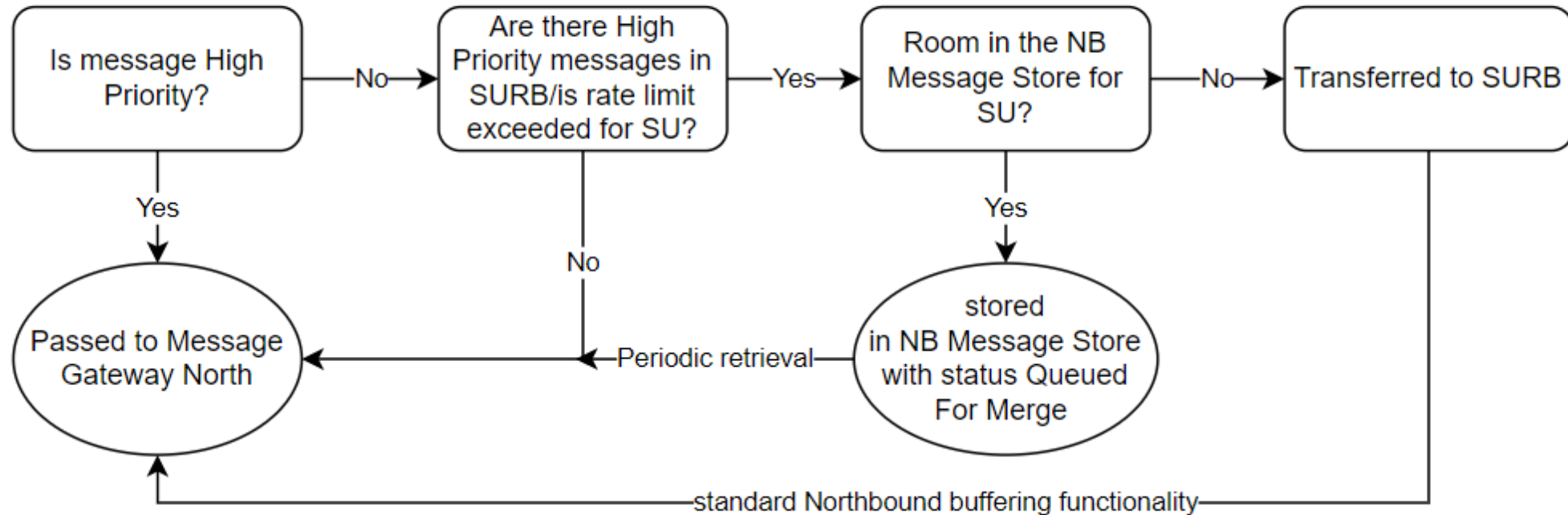
## CR4879

- Network Traffic Management Enhancement (Northbound)
- Service User Retry Buffer (SURB) reconfiguration

# ■ Solution comparisons

| Priority Level | SECMP0028 (Northbound & Southbound) | MP208 (Northbound only)                           | CR4879 (Northbound only)               |
|----------------|-------------------------------------|---------------------------------------------------|----------------------------------------|
| 1              | Supply-critical messages            | N56 Alerts only                                   | All On-Demand Service Responses/Alerts |
| 2              | Relevant to on-site work            | On-Demand Service Responses                       | All Scheduled Service Responses/Alerts |
| 3              | Consumer-driven requests            | Device/DCC Alerts other than High Priority Alerts |                                        |
| 4              | None of the above                   | Scheduled Service Responses                       |                                        |

# ■ Proposed Solution – Northbound architecture



Northbound solution architecture applies to SECMP0028, MP208 and CR4879

# ■ Considerations

- Configurable Priority Levels:
  - DCC consult
  - OPSG/SSC/TABASC review
  - Panel approve
- Technical architecture of Southbound pathway to be determined in Full Impact Assessment
- SECMP0028 business requirements could be amended to cover Southbound prioritisation only

- Nothing in SEC preventing DCC from applying prioritisation to processing messages.
- Priority Levels should not be defined in the SEC as any configuration changes would need to pass through the modification process.
- New clause to be inserted in Appendix AB 'Service Request Processing Document' defining adherence to Priority Levels.
- Priority Levels to be recorded in Code Required Document.

# Refinement Consultation concerns

## Priority becomes 'redundant' through repetition

- If repeated attempts are made to send the same message, only the first attempt is 'high priority' as once it is processed the others become redundant.
- Unclear if DCC System could recognise this; being investigated for Full Impact Assessment.

## Could different messages have different priorities at different times of the day/week?

- Respondent queried whether priorities could apply during 'set time periods'.
- Unclear if benefit would outweigh additional cost to deliver.

# ■ Refinement Consultation concerns (cont'd)

## 'Denial of Service' risk

- Previously identified as minor risk by SSC.
- Additional checks on Service User rate limits to be introduced.
- Parties still bound by responsible use policies.

## Delays to messages with lower priority

- DCC to conduct performance testing during PIT to ensure SLAs are still met during BAU traffic levels.
- However, prioritisation only becomes a factor during periods when SLAs are already in danger of being missed. The aim of the modification is to limit the impact this has on the most time-sensitive messages.

# ■ Preliminary Assessment Summary

## Cost (Design, Build & PIT)

- £350,000 - £750,000
- If Northbound architecture is delivered under a different workstream, costs for SECMP0028 would be reduced.

## Implementation

- Six months from approval to end of Pre-Integration Testing (PIT).
- Based on the existing requirements, the total fixed price cost for a Full Impact Assessment is **£15,260** and would be expected to be completed in **40 Working Days**.

# ■ Questions for the Working Group

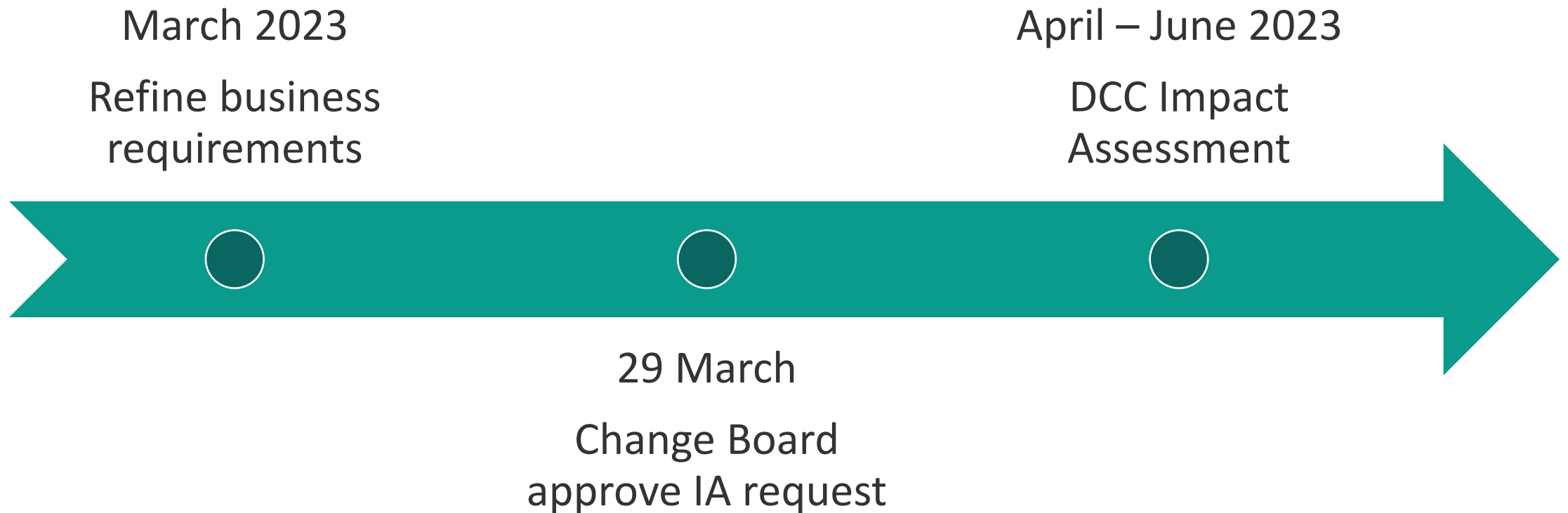
If the solution architecture for Northbound prioritisation will be delivered under MP208/CR4879, should SECMP0028 requirements change to Southbound only?

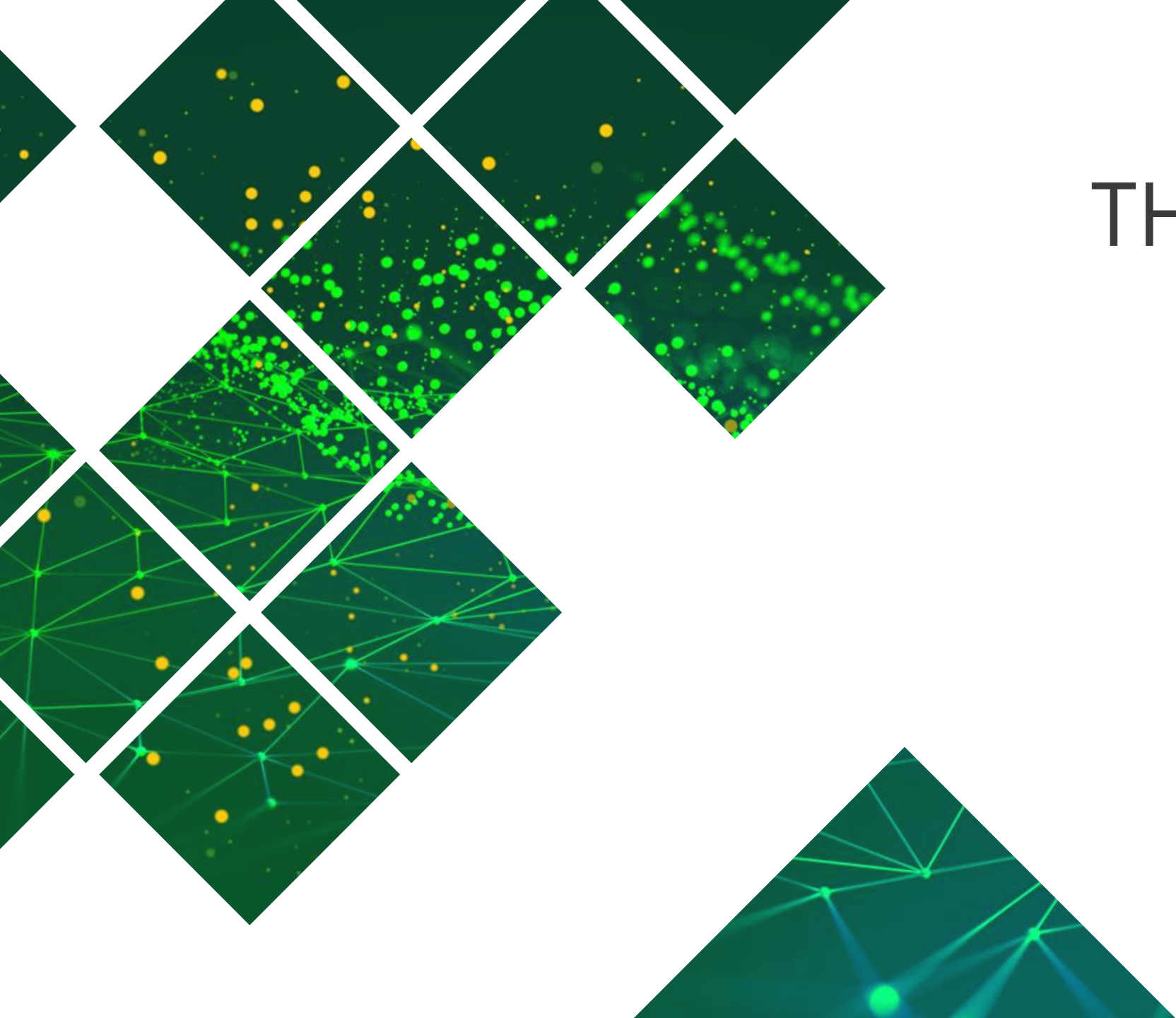


Is the modification ready to be sent for DCC Impact Assessment?



# Next Steps





# THANK YOU FOR LISTENING

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## ANY FURTHER COMMENTS?

# ■ MP231: 'FIRMWARE UPGRADE PATHWAYS'

Raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC)

# OBJECTIVES OF THE WORKING GROUP

|       |                                 |
|-------|---------------------------------|
| AGREE | The issue is defined            |
| AGREE | The Devices in scope            |
| AGREE | The solution is fit for purpose |
| AGREE | The next steps                  |

## Current arrangements

- GBCS Section 11.1 contains information relating to firmware upgrades.
- Device Manufacturer can specify any special requirements to be applied to a firmware upgrade on their Device, and what controls or dependencies are included.
- Certain Device models need to have a firmware upgrade applied in a specific order.

## Issue

- Not an uncommon requirement for firmware updates to be implemented in a specific order.
- Failure to follow the specific order can result in unintended consequences.
- No central location for information required to ensure each Device's firmware upgrade is applied correctly.
- No requirement in the SEC for that information to be provided.

# PROPOSED SOLUTION

## Central Products List (CPL)

- The CPL Entry ID describes a unique Device model.
- Proposed new Field on the CPL New Entry form - 'Firmware Upgrade Path'.
- Contains the previous CPL Entry IDs which must be used as base firmware version when carrying out a firmware upgrade.

## Firmware Information Repository (FIR)

- Brought in by SECMP0009.
- Inclusion of the 'Firmware Upgrade Path' in the FIR.
- May contain several base firmware versions when permitted.
- Must contain "N/A" if no previous base firmware version exists.
- Firmware Upgrade Path needs to be editable by SECAS.
  - Similar to e.g. CPA certificate number and CPA expiry data.

# POTENTIAL SOLUTION (2)

| CPL Firmware Information Repository |                 |                                                                                                                                                                                                                                             |                                                 |                            |
|-------------------------------------|-----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------|
| CPL Reference                       | Manufacturer    | Contact Details                                                                                                                                                                                                                             | Manufacturer Firmware Description / Information | Upgrade Path CPL Reference |
| 000462                              | EDMI Europe Ltd | 17, Bartley Business Park,<br>Bartley Way<br>Hook, RG27 9XA<br>UK<br>01256 830 990<br><a href="https://www.edmi-meters.com/europe/vivek.srivastava@edmi-meters.com">https://www.edmi-meters.com/europe/vivek.srivastava@edmi-meters.com</a> | Electric Meter Factory and OTA release          | 000432                     |
| 000527                              | EDMI Europe Ltd | 17, Bartley Business Park,<br>Bartley Way<br>Hook, RG27 9XA<br>UK<br>01256 830 990<br><a href="https://www.edmi-meters.com/europe/Suki.Nahar@edmi-meters.com">https://www.edmi-meters.com/europe/Suki.Nahar@edmi-meters.com</a>             | Electric Meter Factory and OTA release          | 000462                     |
| 000528                              | EDMI Europe Ltd | 17, Bartley Business Park,<br>Bartley Way<br>Hook, RG27 9XA<br>UK<br>01256 830 990<br><a href="https://www.edmi-meters.com/europe/Suki.Nahar@edmi-meters.com">https://www.edmi-meters.com/europe/Suki.Nahar@edmi-meters.com</a>             | Electric Meter Factory and OTA release          | 000462<br>000527           |

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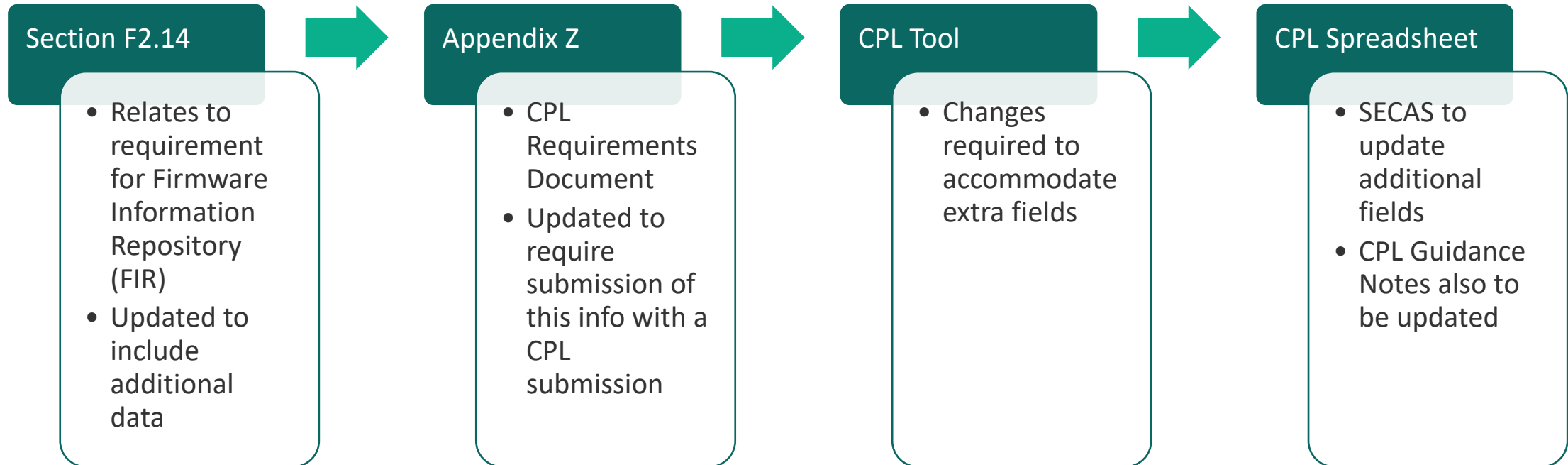
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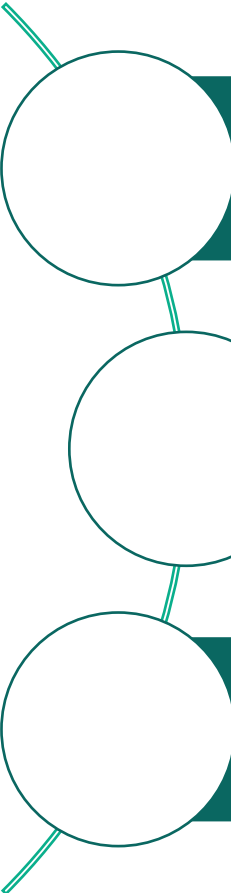
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# ■ CHANGES REQUIRED



# ■ QUESTIONS FOR THE WORKING GROUP



What Devices should be in scope?

Should information be applied retrospectively to the FIR?

Should Communications Hubs and 'interoperability' be out of scope?

# CASE FOR CHANGE

## Implementation Approach

- June 2023 SEC Release

## Consumer benefits

- Devices could be affected by being updated incorrectly and require a site visit at the inconvenience of the consumer

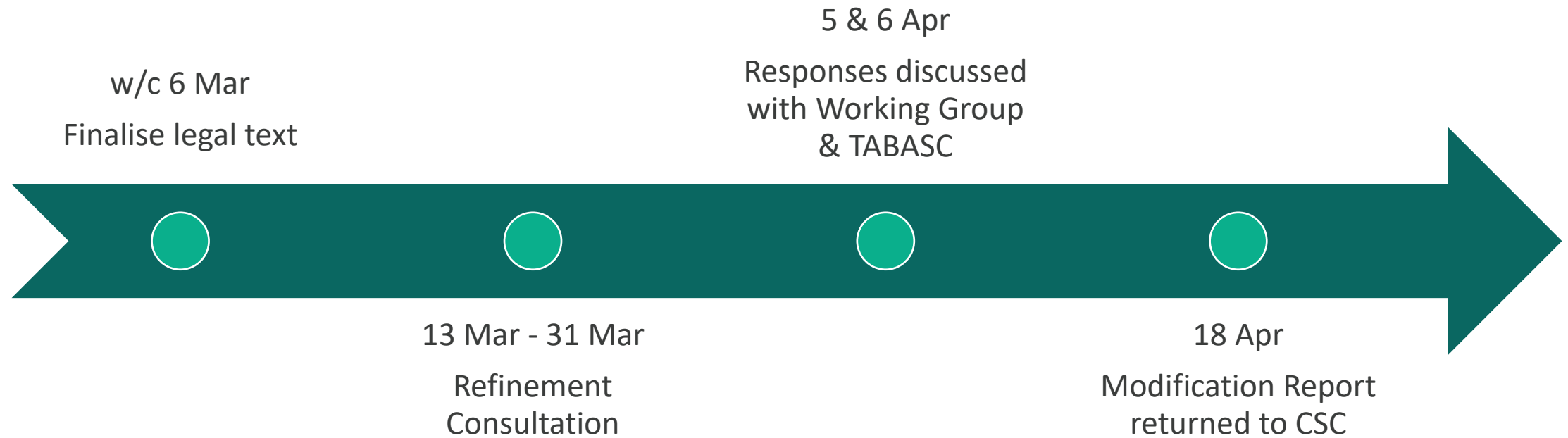
## Impacts and costs

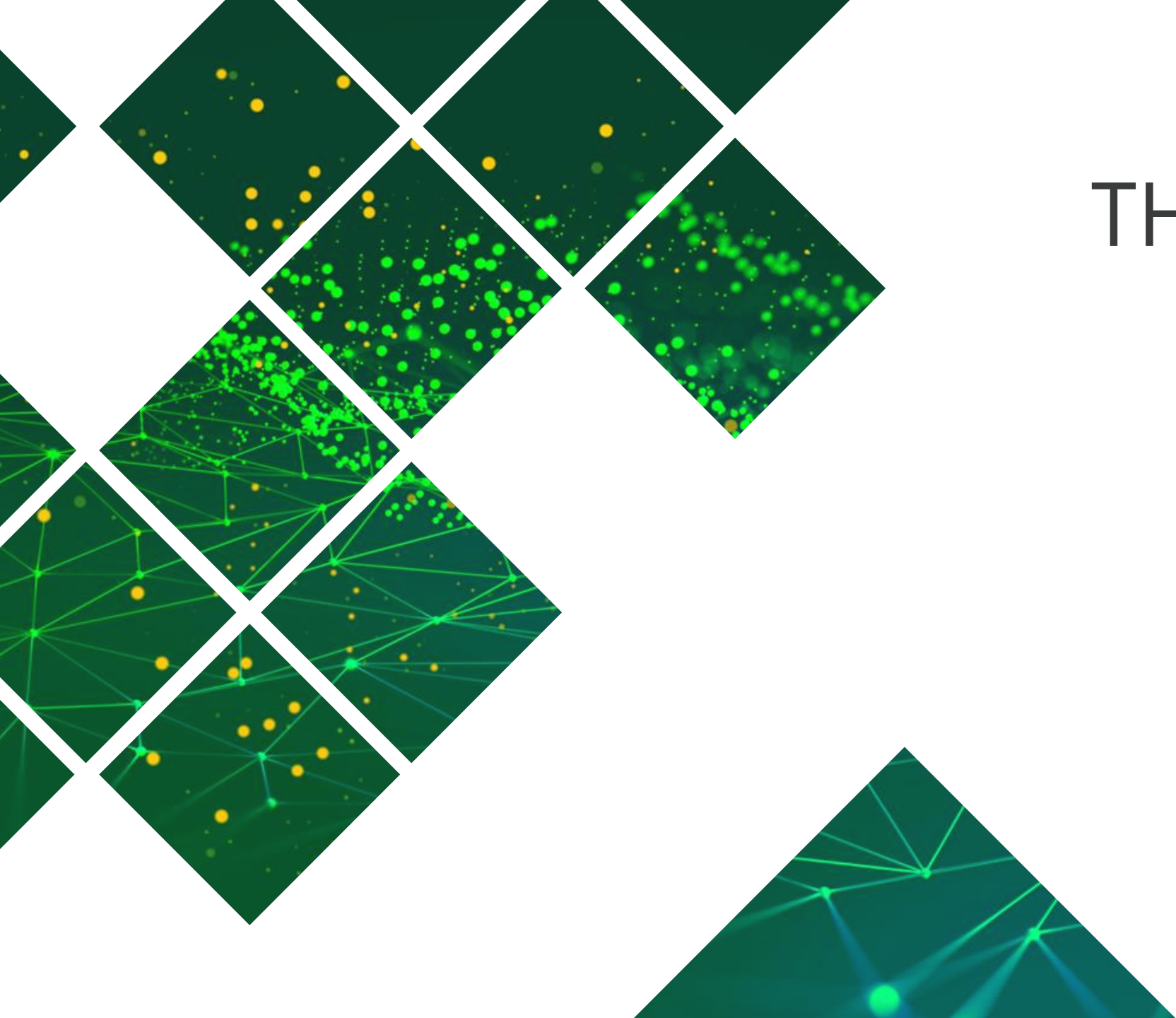
- SECAS implementation costs

## SEC Objectives

- Proposer believes this better facilitates SEC Objective (a) by ensuring Devices work as intended

# ■ NEXT STEPS





# THANK YOU FOR LISTENING

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## ANY QUESTIONS?

# ■ MP219 'Accessing Consumption Data on behalf of SEC Parties'

Raised by Matt Roderick of n3rgy

# ■ Objectives of the Working Group

|       |                       |
|-------|-----------------------|
| NOTE  | The issue             |
| AGREE | The Proposed Solution |
| AGREE | The next steps        |

# Overview

## Issue

- The SEC does not allow Other Users to collect Consumption Data on behalf of SEC Parties without the Other User first obtaining Unambiguous Consent from each Energy Consumer.

## Impact

- If SEC Parties want to employ an Other User to collect information for them, the Other User needs to contact a high number of Energy Consumers to collect their consent.
- Due to the time and effort this would incur, this prevents Other Users from acting commercially for SEC Parties.

## Proposed Solution

- Would allow contracted Other Users to retrieve Consumption Data on behalf of employing SEC Parties without retrieving the Unambiguous Consent of the Energy Consumer.

## December 2022 Working Group

- Other Users can only access Data as per the employing Party's Licence.
- The term 'Consumption Data' only covers Import Data.

# ■ Proposed Solution

## Legal Text

### Appropriate Permission

- *means, in respect of a Communication Service or Local Command Service to be provided to a User in respect of a Smart Metering System at a premises that will result in the User obtaining Consumption Data, either:*
  - (a) *(where that User is the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor or Gas Transporter for that Smart Metering System) that the User does not need consent to access that Consumption Data in accordance with its Energy Licence, or that the User has consent (whether explicit or implicit) in accordance with the requirements of its Energy Licence; or*
  - (b) *(where that User is not the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor or Gas Transporter for that Smart Metering System) that the Energy Consumer has given the User Unambiguous Consent to obtain that Consumption Data and such consent has not been withdrawn; or*

# ■ Proposed Solution

## Legal Text

### Appropriate Permission

*(c)(where that User is not the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor or Gas Transporter for that Smart Metering System, but the User is contracted by the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor and/or Gas Transporter for that Smart Metering System to obtain Consumption Data from that Smart Metering System) that such Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor and/or Gas Transporter either does not need consent to access that Consumption Data in accordance with its Energy Licence, or has consent (whether explicit or implicit) in accordance with the requirements of its Energy Licence.*

# ■ Proposed Solution

## Legal Text

- Section I1.2 'Data Privacy'

- Consumption Data

*I1.2 Each User undertakes that it will not request, in respect of a Smart Metering System, a Communication Service or Local Command Service that will result in it obtaining Consumption Data, unless:*

- (a) the User has the Appropriate Permission in respect of that Smart Metering System; ~~and~~*
- (b) (where that User is not the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor or Gas Transporter for that Smart Metering System **and is relying on paragraph (b) of the definition of Appropriate Permission**) the User has, at the point of obtaining Appropriate Permission and at such intervals as are reasonably determined appropriate by the User for the purposes of ensuring that the Energy Consumer is regularly updated of such matters, notified the Energy Consumer in writing of:*
  - (i) the time periods (by reference to length) in respect of which the User obtains or may obtain Consumption Data;*
  - (ii) the purposes for which that Consumption Data is, or may be, used by the User; and*
  - (iii) the Energy Consumer's right to object or withdraw consent (as the case may be) to the User obtaining or using that Consumption Data, and the process by which the Energy Consumer may object or withdraw consent; **and***

# ■ Proposed Solution

## Legal Text

*(c)(where that User is not the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor or Gas Transporter for that Smart Metering System and is relying on paragraph (c) of the definition of Appropriate Permission) the User obtains Consumption Data only for (and in accordance with the rights and duties of) the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor and/or Gas Transporter by which the User is contracted (and does not obtain or use the Consumption Data for any other purpose).*

### *I1.2A*

- If the Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor and/or Gas Transporter for a Smart Metering System contracts another User to obtain Consumption Data as envisaged by Section I1.2(c), then both the employing Party and the other User which is providing the service shall be liable for the acts and omissions of such other User in its role as service provider. Without limitation, both the employing Party and such other User shall be in breach of this Code if such other User obtains and/or uses Consumption Data in a manner that breaches the employing Party's Energy Licence.*

# ■ Case for change

## Implementation Approach

- June 2023 SEC Release (if Ofgem decision returned)

## Consumer benefits

- Other Users able to offer consumers better services to help manage their usage

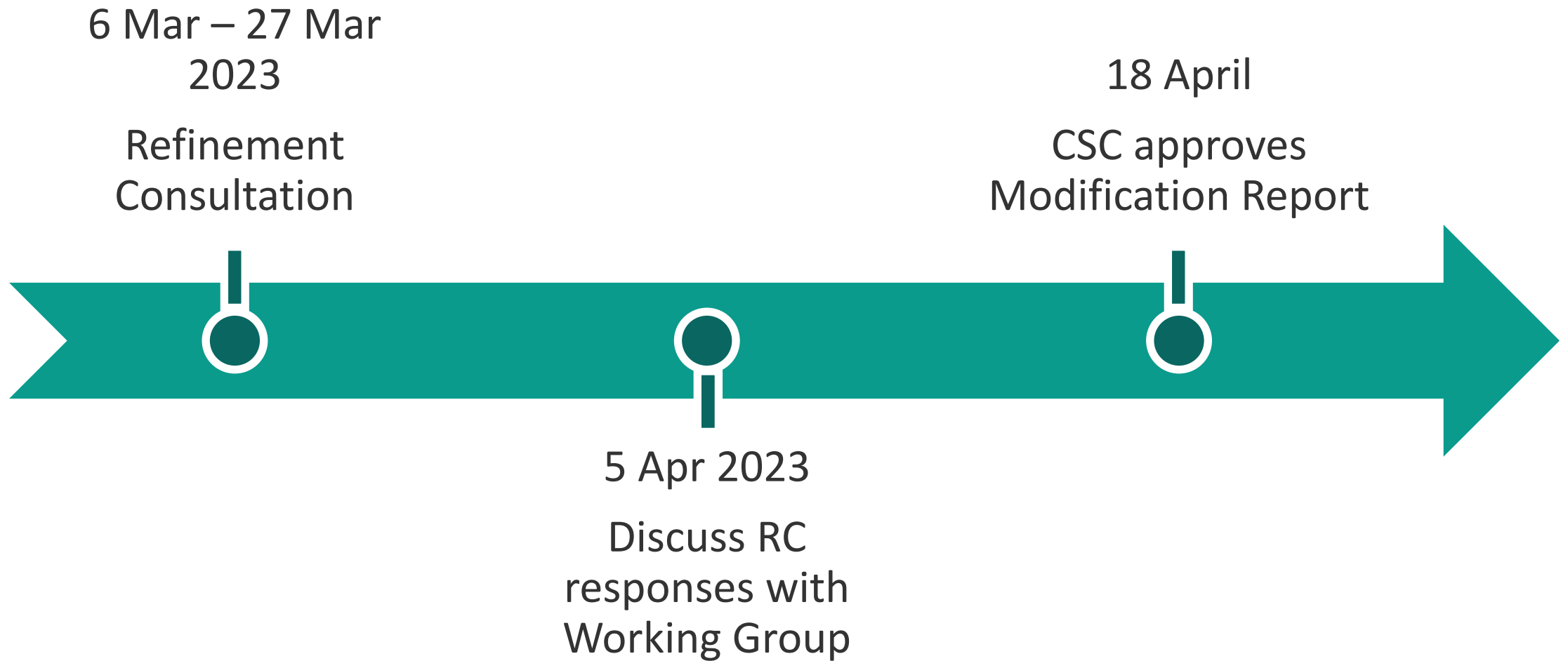
## Impacts and costs

- SECAS implementation costs

## SEC Objectives

- Proposer believes this better facilitates SEC Objective (a) and (c) by ensuring allowing consumers to better understand and manage their usage

# ■ Next Steps



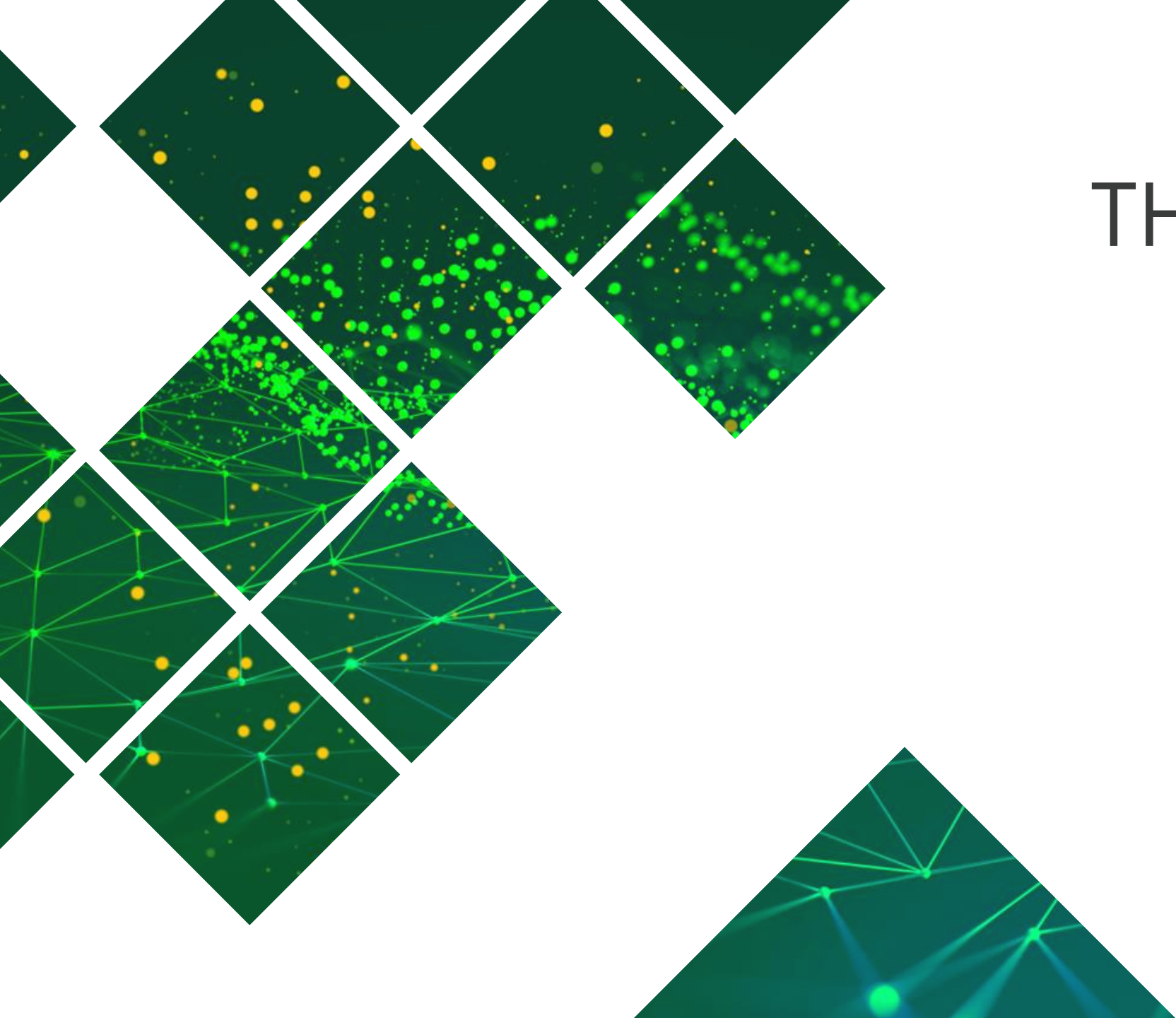
# ■ Questions for the Working Group

Would the suggested legal text deliver the Proposed Solution?



Any further comments?





# THANK YOU FOR LISTENING

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## ANY FURTHER COMMENTS?

# MP202 - Enduring Solution for SMETS1 and SMETS2+ PPMIDs – Clarifications Required

Abhijit Pal

*We believe in making Britain more connected,  
so we can all lead smarter, greener lives.*

20/02/2023

# MP202 – Summary & Status

**Objective of the proposal**– To support “late-binding” of ‘bilingual’ PPMID (works on both SMETS1 and SMETS2+) with Comms Hub to avoid logistical issues during installations

**Current Status** – SECAS requested DCC for Final Impact Assessments

**Problem Statement** - DCC would like to highlight an issue with the business requirements for the Modification Proposal

| Business Requirements |                                                                                                                                                                                             |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Ref.                  | Requirement                                                                                                                                                                                 |
| 1                     | To allow the same Pre-Payment Meter user Interface Device (PPMID) Device Model to be used in Smart Metering Equipment Technical Specifications (SMETS)1 and SMETS2+ Smart Metering Systems. |
| 2                     | Remove obligation for different Firmware Versions for PPMIDs                                                                                                                                |
| 3                     | Retain current arrangements for adding PPMID Device Models to the Central Products List (CPL)                                                                                               |
| 4                     | Allow the Pre-Notification of a dual mode PPMID                                                                                                                                             |
| 5                     | Whitelisting of dual mode PPMID                                                                                                                                                             |
| 6                     | Implement Verification of the SMETS version of the Smart Metering System targeted by Service Request (SR)_8.11                                                                              |
| 7                     | Enable Over The Air (OTA) firmware upgrades to a dual mode PPMID enrolled in a SMETS2+ Smart Metering System                                                                                |

# MP202 – Business Requirements #7

## 2.8 Requirement 7: Enable OTA firmware upgrades to dual mode PPMID enrolled in a SMETS2+ Smart Metering System.

OTA firmware upgrades to PPMIDs are supported starting with GBCS v4.1. A dual mode PPMID which, following the whitelisting process described in Requirement 3 (see Section 2.6), is listed as a SMETS2+ compatible device in the 'SMETSCHTSVersion' must support the OTA firmware upgrade.

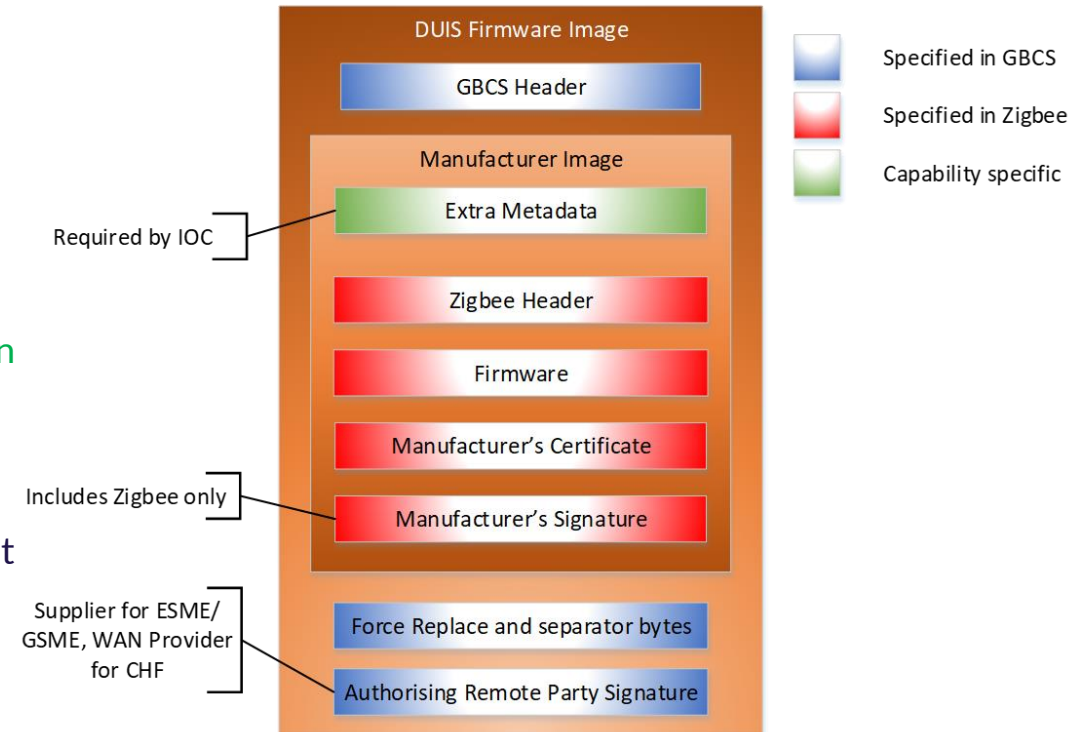
A dual mode PPMID which, following the whitelisting process described in Requirement 3 (see Section 2.6), is listed as a SMETS1 compatible device in the 'SMETSCHTSVersion' must not support the OTA firmware upgrade. This follows from the SMETS1 OTA process where one of the following applies:

1. The SMETS1 PPMID OTA Manufacturer Image requires a SMETS1 Supporting Requirements (S1SR) specific header. This means the Device Model must have its own CPL entry since the Manufacturer Image and the Hash are different from the SMET2+ model. It is not possible to treat this as a dual mode PPMID.
2. The DCC disassembles the OTA firmware data and inserts the S1SR specific header and forwards the re-assembled OTA firmware data to the S1SR. This is deemed out of scope for this modification.

**Question – Does this modification Proposal should disallow OTA firmware upgrade to SMETS1 devices for bilingual PPMIDs?**

# MP202 – issue with Requirement #7

- SMETS1 currently supports PPMID FW upgrade
  - For some of the ‘bilingual’ PPMIDs, 2 different FW images are used
    - A IOC cohort (S1SP-CGI Instant Energy) meter specific FW image which contains additional metadata in the manufacturer image (green bit in the diagram)
    - Another FW image for all other cohorts (including SMETS2+) without the extra metadata.
- Note – IOC cohort specific image will not work on other SMETS1 and SMETS2+ CHF
- DCC analysed and considered a technical solution (DCC CR 4340) to move towards single PPMID FW image that works with all SMETS1 and SMETS2+ cohort.
  - Energy Supplier, IHD Manufacturer and DCC Device testing team possibly handling these multiple FW images complexity for bilingual PPMIDS based on different SMETS1 cohorts



# MP202 – issue with Requirement #7

## Questions

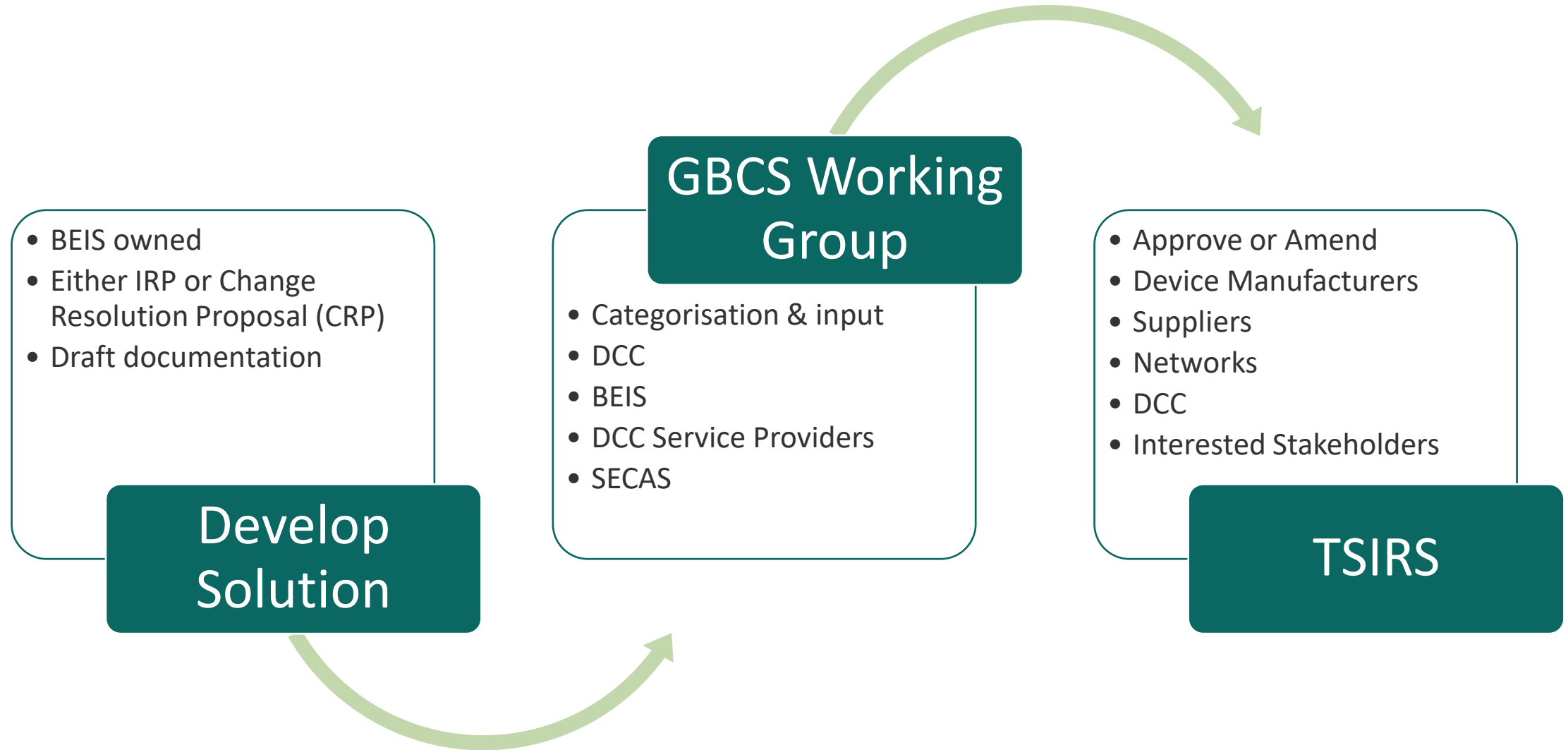
1. Does MP202 need to disallow OTA FW upgrade to SMETS1 CHF as mentioned in detailed clarification of Business Requirement #7 where OTA FW upgrade to SMETS1 for bilingual PPMID is an existing capability?
2. What is Industry's view on the resolving this multiple PPMID FW image issue for different Meters/CHFs?

Thank you.

# IRP PROCESS UPDATE

Kev Duddy

# PRE SECAS PROCESS



# ■ CATEGORISATION – A REMINDER

## Category 1

- DCC core system impacting, requiring a code / system change.

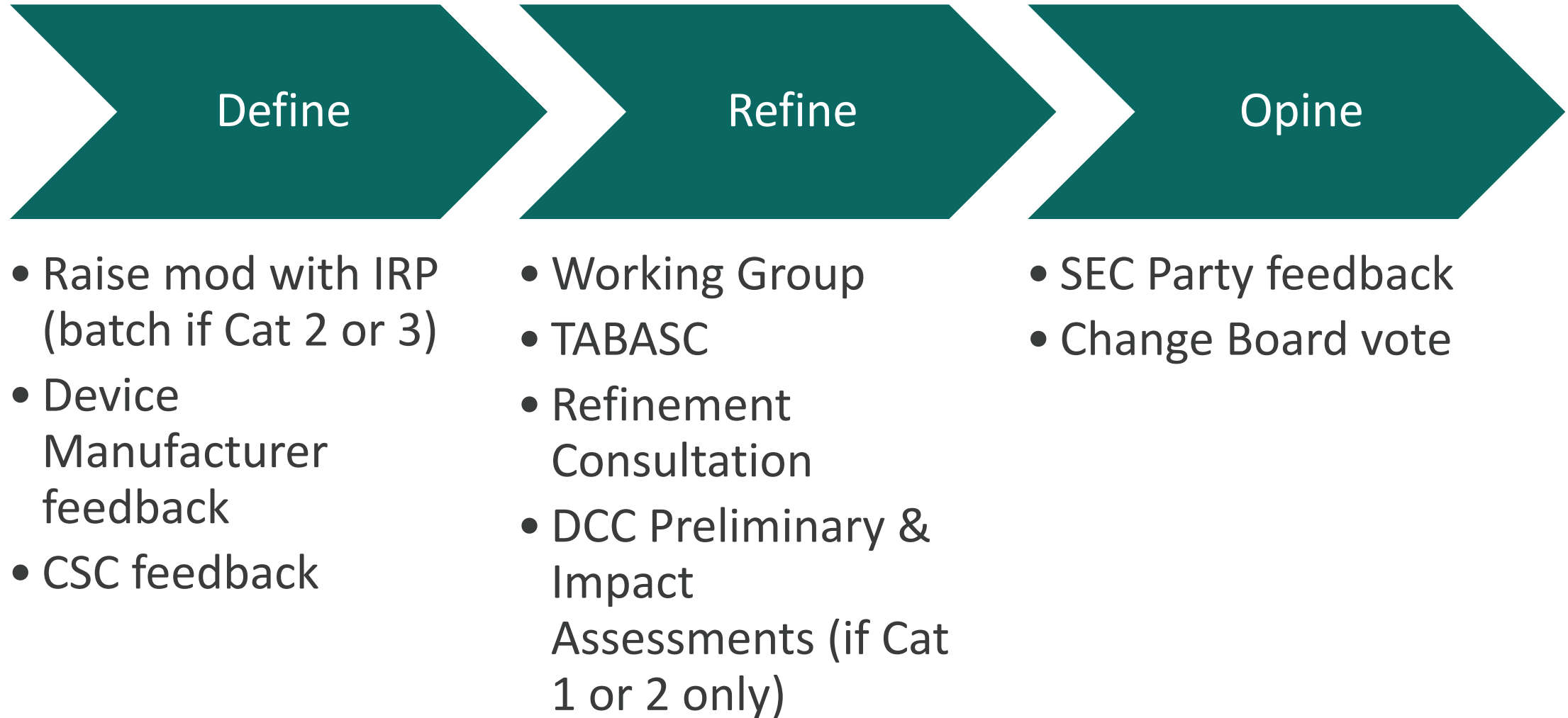
## Category 2

- Non-DCC core system impacting, no code / system change required, just has a testing / testing tool impact i.e. requires addition of new test cases, updating existing test cases, developing / updating test tools to support testing or emulator change.

## Category 3

- Non-DCC core system impacting, no code / system change required, these are documentation-only changes or changes impacting Devices other than Communication Hubs which require re-running regression tests to cover these changes.

# MOD PROCESS



# PITFALLS & IMPROVEMENTS

## MP078 was rejected

- SECAS agreed to break up 'batches' if costs were significant
- TSIRS now provide supporting rationale for change

## Working Group provide limited engagement

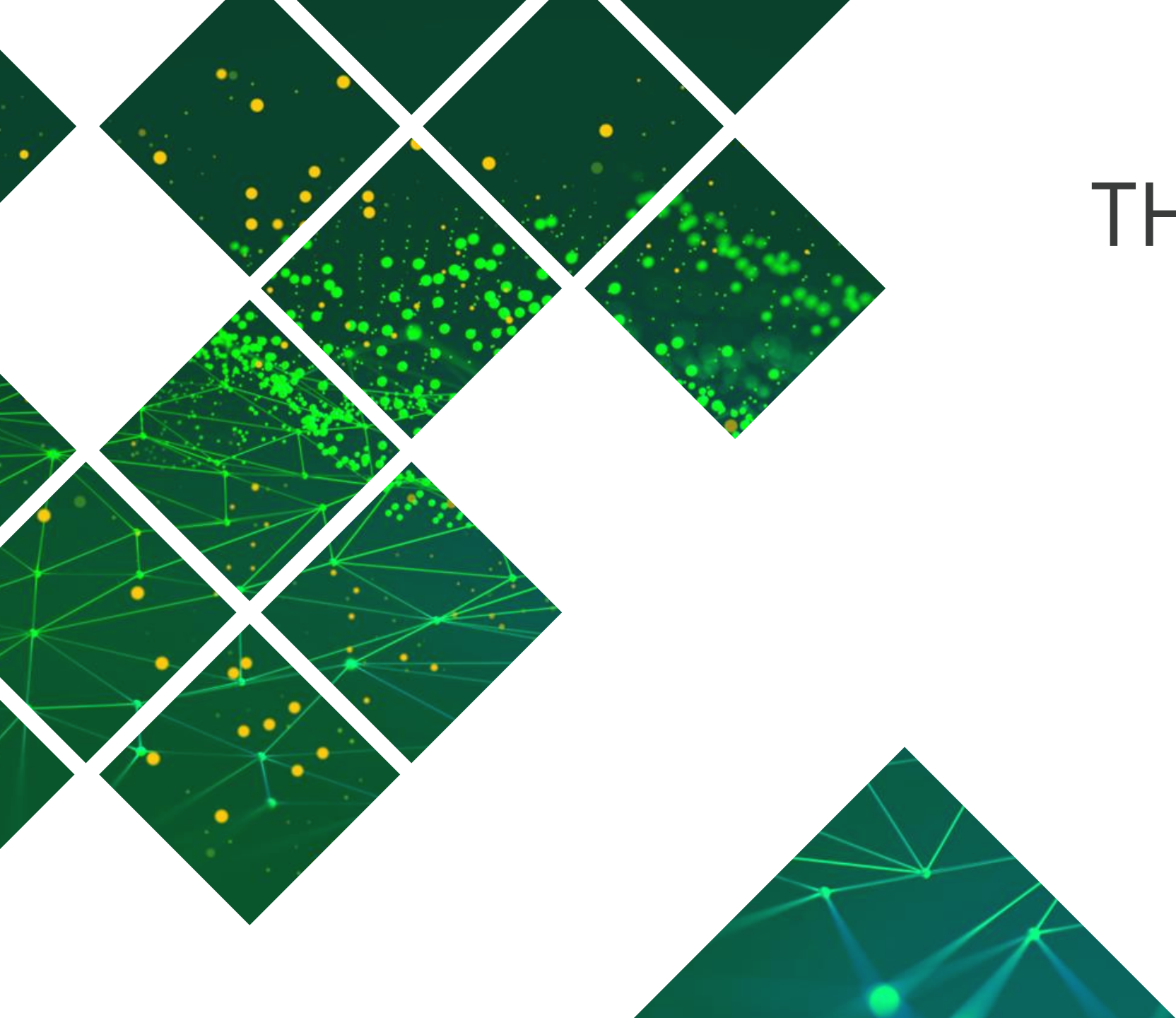
- Members may not be both technical and commercially minded
- Increased TABASC and Device Manufacturer engagement to compensate

## RC responses are limited

- Increased engagement outside of consultation to gain feedback for Mod Report

## BEIS-led process

- Solution provided by BEIS. Should it be implemented?
- SECAS has strengthened relationship with TSIRS to discuss costs as they arise



# THANK YOU FOR LISTENING

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## ANY QUESTIONS?

# ■ ANY OTHER BUSINESS

Ali Beard



# THANK YOU FOR LISTENING

THE NEXT MEETING WILL BE ON  
WEDNESDAY 5 APRIL 2023