

# SEC Change Monthly Working Group Meeting

December 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



# ■ MP247: Future Dating of Service Requests for SMETS1 Devices'

Liz Woods

Raised by David Walsh from the DCC

**MEDIUM**

# Objectives of the Working Group

|         |                               |
|---------|-------------------------------|
| NOTE    | Overview                      |
| CONFIRM | Which Option to Impact Assess |
| AGREE   | The next steps                |

## Issue



- Short-term peak usage caused incidents for S1SP
- DUIS currently prevents DCC from Future Dating SRs for SMETS1 Devices
- DSP holds all SMETS1 Future Dated SRs, for release to SMETS1 Devices at a future date

## Solution



- Allow Users to send Future Dated SRs to SMETS1 Devices without being held at the DSP
- Cost saving Alternative Solution (only SRV 1.1.1 and 1.2.1)
- Does not include Alert / Notification to indicate FD command has arrived at Device

## Legal Text



- Will be developed as part of the Full Impact Assessment
- SEC Appendix AD 'DCC User Interface Specification'

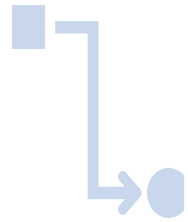
## Support



- 1 Respondent supported (*MOC only*)
- 1 Respondent did not support modification for any SMETS1 cohort

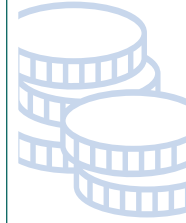


# Assessment of Change



## Impacted Parties

- Suppliers
- DCC



## Costs

- Alternative Solution (up to PIT only)
  - All Cohorts - £1.25m - £2.1
  - MOC only - £516k to £745k
- Consequential costs to Parties £50k - £500k
- SECAS implementation costs



## Target Release

- June 2026 SEC Release
- 12-month lead time



## Benefits

- More efficient process
- No need to exchange Devices

Expecting Post-PIT cost and effort to be high & does not include implementation costs for new DSP



# ■ Questions for the Working Group

Should a Reduced Scope Impact Assessment be requested for all Cohorts or only MOC?



Or no Impact Assessment requested?

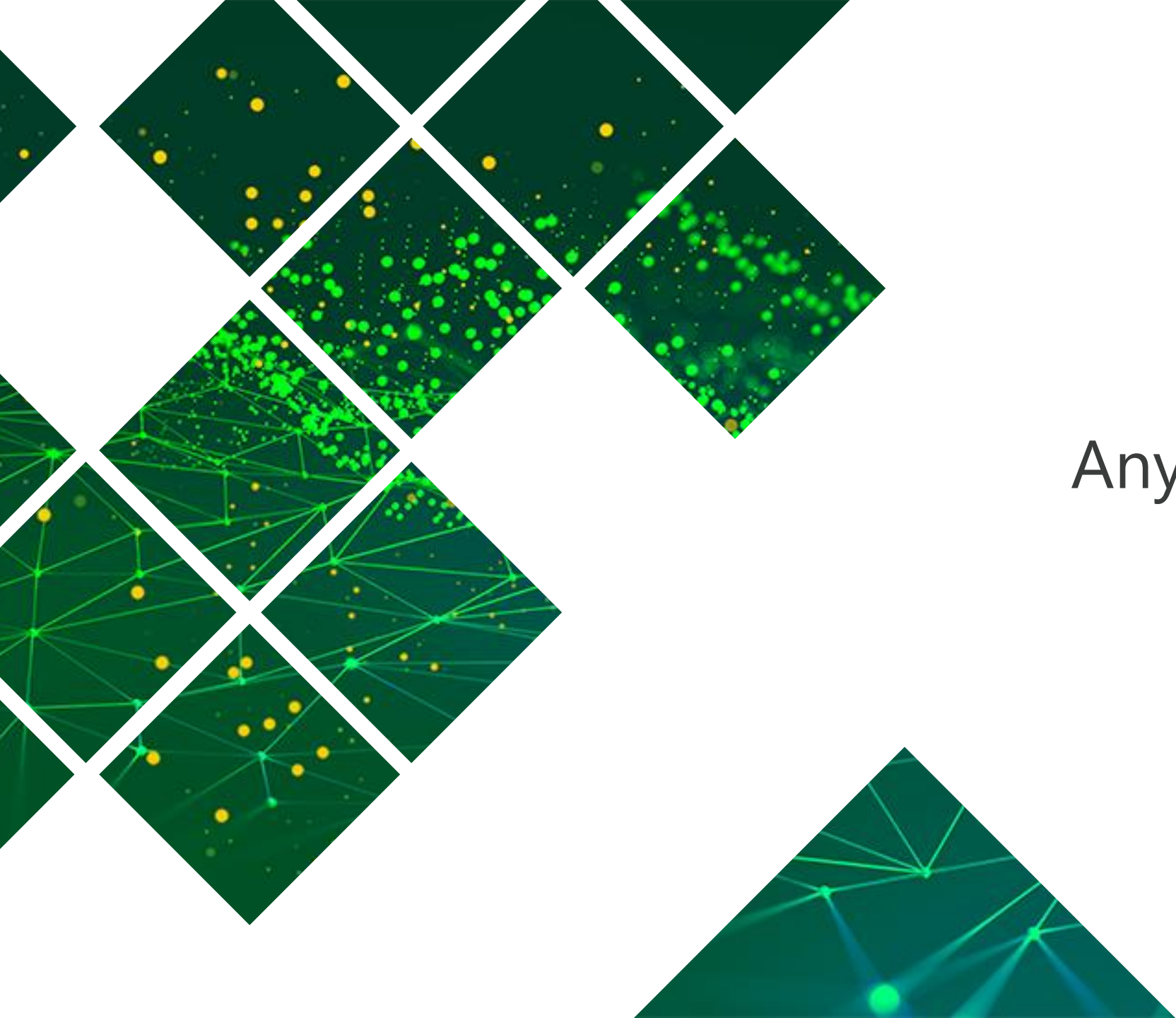


Any other comments?



# ■ Next Steps





Thank you for  
listening

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Any further comments?

# ■ MP268 'Certificate rotation and expired Certificates'

Liz Woods

Raised by Bradley Baker from the DCC

**HIGH**



## Issue

- Devices manufactured after the 2024 Manufacturing Pack release may contain information from an Organisation Certificate with a Validity Period exceeding ten years.
- SMKI PMA deems that Certificates with a Validity Period longer than ten years are an increased security risk
- There is no explicit SEC requirement for post-commissioning replacement of Organisation Certificate information by the DCC.

## Impact

- Anticipated that Devices will be installed in 2026 and beyond which contain expired Certificates which will need to be replaced.

## Proposed Solution

- Clear guidelines within the SEC mandating Post-Commissioning replacement of Organisation Certificates by the DCC.
- Guidelines will provide explicit instructions and timelines for replacing any Organisation Certificate which has a Validity Period longer than ten years, or is revoked or expired.

# ■ MP268: Proposed Solution Summary

## Automatic Organisation Certificate replacement

- Daily automatic initiation of ACB Certificate replacement by DSP
- This automation will prioritise Devices commissioned within the last 48 hours
- If replacement fails, the system retries every 7 days for up to three attempts (21 days total)

## Backlog management

- Newly commissioned Devices (within the last 23 days) are prioritised for ACB Certificate replacement
- This allows newer Devices to be updated promptly while the system manages the backlog

## Exclusion

- Prepayment Interface Devices (PPMID) will be excluded from automatic ACB Organisation Certificate replacement due to known limitations.
- Many legacy firmware versions of PPMIDs do not support Certificate rotation. In addition, there are a large number of PPMIDs not supported by SECMP0007.

# ■ MP268: Proposed Solution - Reporting

## Reporting detail

- Validity Period exceeding ten years
- Are revoked or expired
- Expiring within 18 months
- Are incorrectly assigned in Trust Anchor Cells

## Data Points

- GUID
- Device ID
- Device type
- Operational status
- Key location
- Certificate details
- Expiration dates

This additional reporting will be part of the existing monthly Post Commissioning Obligations

Service Users and CSP Service Provider receives a weekly report detailing all their Devices which are currently failing the PCO checks as introduced under MP183 'Post Commissioning Obligations Reporting'

# Impact Assessment Impacts

## Key Management

- Data Management will be called periodically (e.g. every 15 mins between 8am-10pm)
- Passing through a list of manufacturer ACB certificates.

## Data Management

- To limit the worklist size to a configurable value
- Devices will be selected and added to the replacement worklist
- If there is still capacity (N):
  - A further N Devices will be selected
  - Added to the replacement worklist

## ECOS Provider (Accenture)

- Changes will be part of existing ECOS solution
- Config change is planned to be in place within 12 weeks of the Private Key Transfer Programme going live
- Production version of the config is referred to as Config File 2.0

## DS&A

- Will continue to use the Device Key Mapping table delivered to obtain information of Device Key rotation
- Will provide a regular feed of SMKI certificate details from the DSP to the DS&A. this is already included in phase 2 of MP239
- No extra effort, just makes reporting mandatory

### No impact to Tech Specs, infrastructure or any other DSP changes

Additional processing and storage are likely to be required. However, they are not sufficiently large to warrant the procurement of additional compute power or storage.



## Section G

- Two new clauses
- Reference for Appendix AC

## Appendix AC

- 4 new clauses
- New clause to introduce obligation on Certificate replacement
- Revoked and Expired Certificate obligations

## Working Group

Supports the modification

Agreed there is a lack of explicit instruction to replace Certificates

Should not impact I&C – Highlighted Certificate replacement should take place after 7 Working Days

## TABASC

Believe Certificate replacement should take place after 48 hours but before 7 days

Most Suppliers have completed I&C after 48 hours and before 7 days to better align to PCO

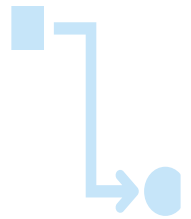
## SSC

Remained neutral

Certificates should be updated no sooner than 48 hours and not later than 23 days after I&C

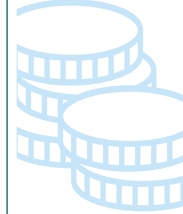
Reporting requirement is captured within current PCO reporting

# ■ MP268: Assessment of Change



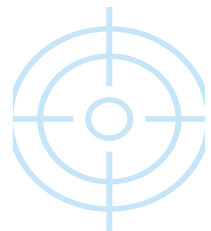
## Impacted Parties

- Suppliers
- Electricity Network Operators
- DCC



## Costs

- SECAS costs
- £289,000 + Post PIT costs



## Target Release

- Nov 2025 SEC Release
- Will be included in the new DSP



## Benefits

- Explicit instructions and criteria when Certificate replacement should occur

## SEC Objective (f)

(f) To ensure the protection of Data and the security of Data and Systems in operation of this Code

# ■ Questions for the Working Group

Is the modification complete and ready to move to Report Phase?



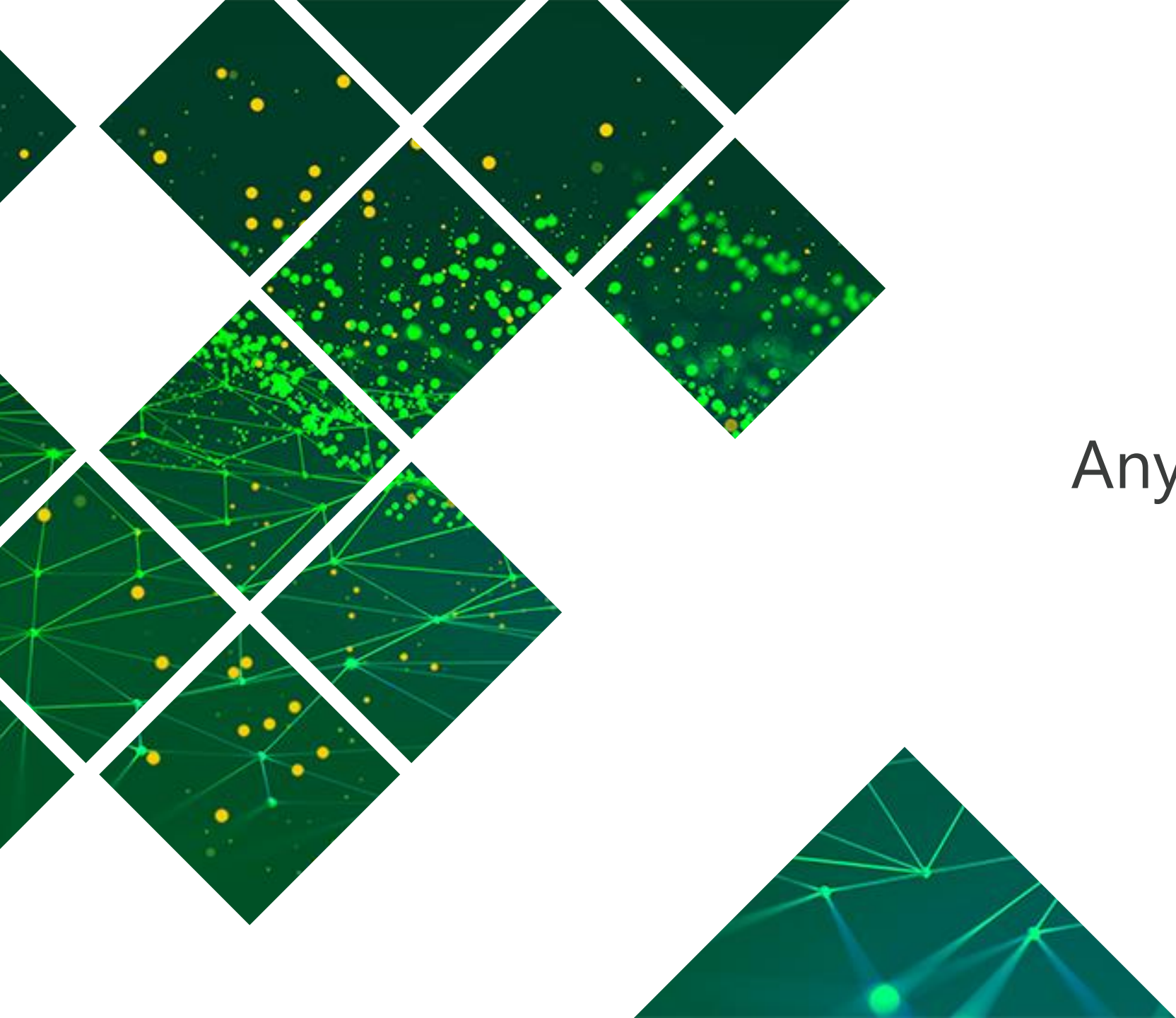
Anything else that needs to be considered?



# Next Steps







Thank you for  
listening

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Any further comments?

# BREAK



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PLEASE RETURN IN 10 MINUTES

# ■ MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'

Ben Giblin

Raised by James Murphy of Stark  
Authority-Determination

LOW

# Objectives of the Working Group

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



## Issue

- The Other SEC Party (OSP) category consists of 159 organisations which have different priorities and issues.
- The Proposer believes it is difficult for OSP representatives to fully represent the constituency.

## Impact

- Without representation for OSPs which are DCC Users, technical solutions may be developed without the correct insight.
- Significant as these groups are forecast to increase their usage of the DCC System.



# ■ MP271: PROPOSED SOLUTION

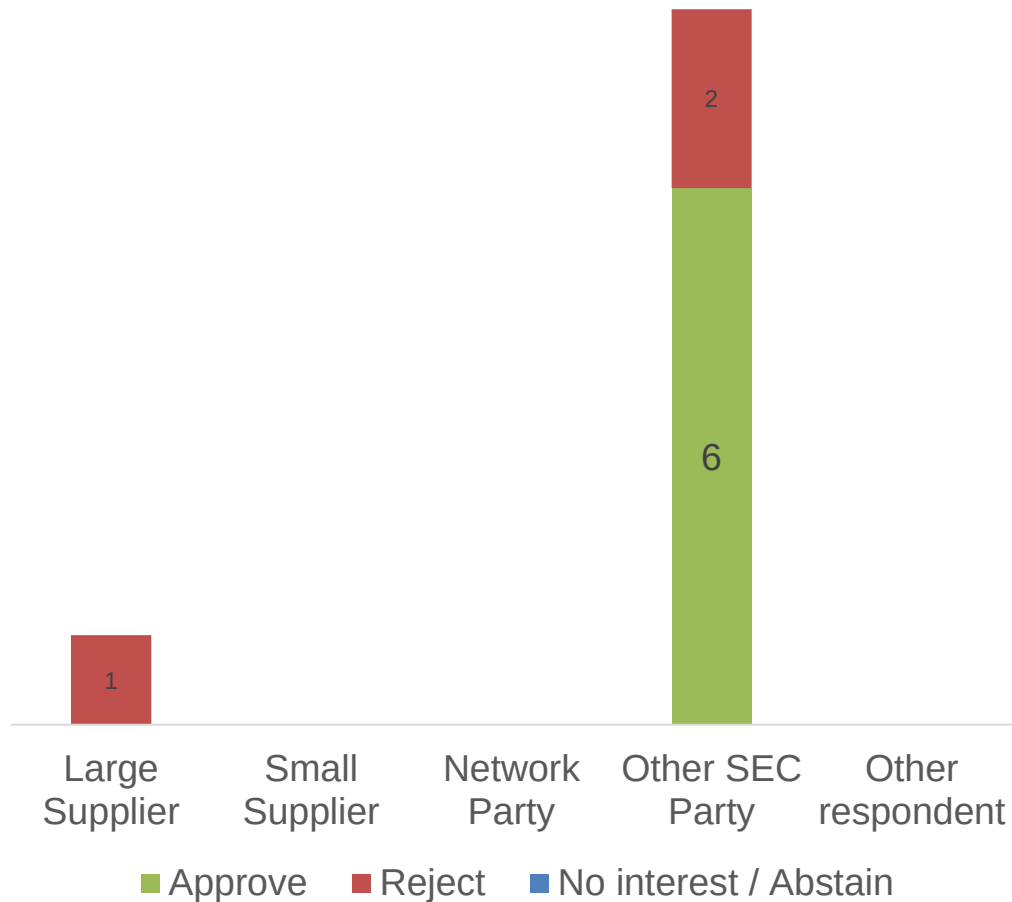
## Change Board

- Proposes to re-allocate one of the three existing OSP seats to an elected Party which acts in the User Role of OU, MDR or RSA.
- The elected OSP would be responsible for representing the entire OSP category.

## TABASC

- Proposes to add an additional OSP seat at the TABASC to be filled by an elected Party which acts in the User Role of OU, MDR or RSA.
- This would increase the number of OSP seats at TABASC from two to three.

# ■ MP271: RC Responses



## Key comments

- All six supportive Parties supported the proposed changes to the TABASC and Change Board.
- Supportive Parties said the modification better facilitates SEC Objectives A, C and D.
- No costs or issues with implementation approach.

# ■ Refinement Consultation responses

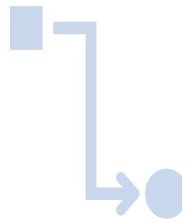
## Supportive

- OU, MDR and RSA have specific knowledge which would support TABASC and Change Board.
- As they are set to increase use of the DCC System over the coming years, this modification ensures they will be included in discussions.
- Costs relating to lack of testing meter variants with OU's could be prevented.

## Unsupportive

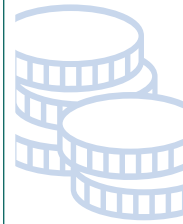
- Limited evidence of an issue – few years where elections have needed to take place.
- Representatives will still have to act on behalf of entire constituency.
- OSP category generally aligned rather than split on issues.
- Could be resolved by increasing engagement within OSP category.

# ■ Assessment of Change



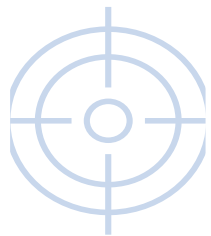
## Impacted Parties

- Other SEC Parties



## Costs

- SECAS implementation costs
- No costs to Parties.



## Target Release

- June 2025 SEC Release



## Benefits

- Ensures knowledge from OU, MDR and RSA is present at Sub-Committee discussions – potentially avoiding costs in future.

# ■ Questions for the Working Group

Do you have any comments on the responses to the Refinement Consultation?

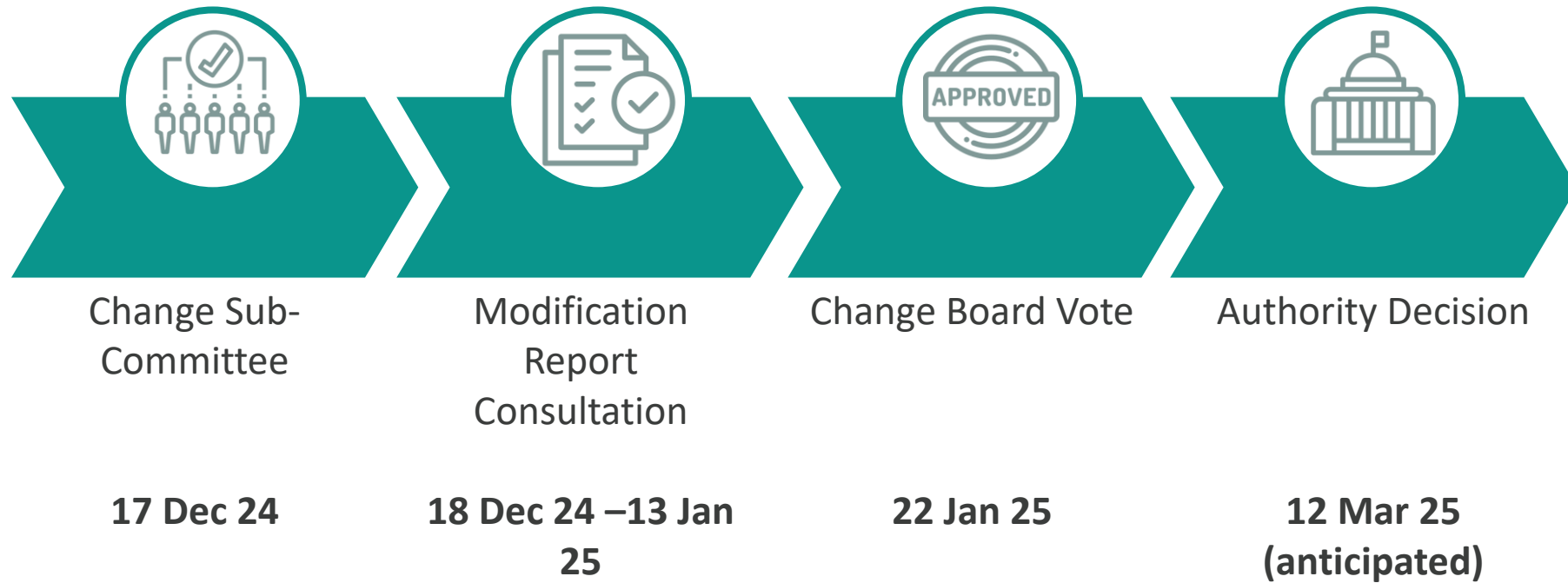


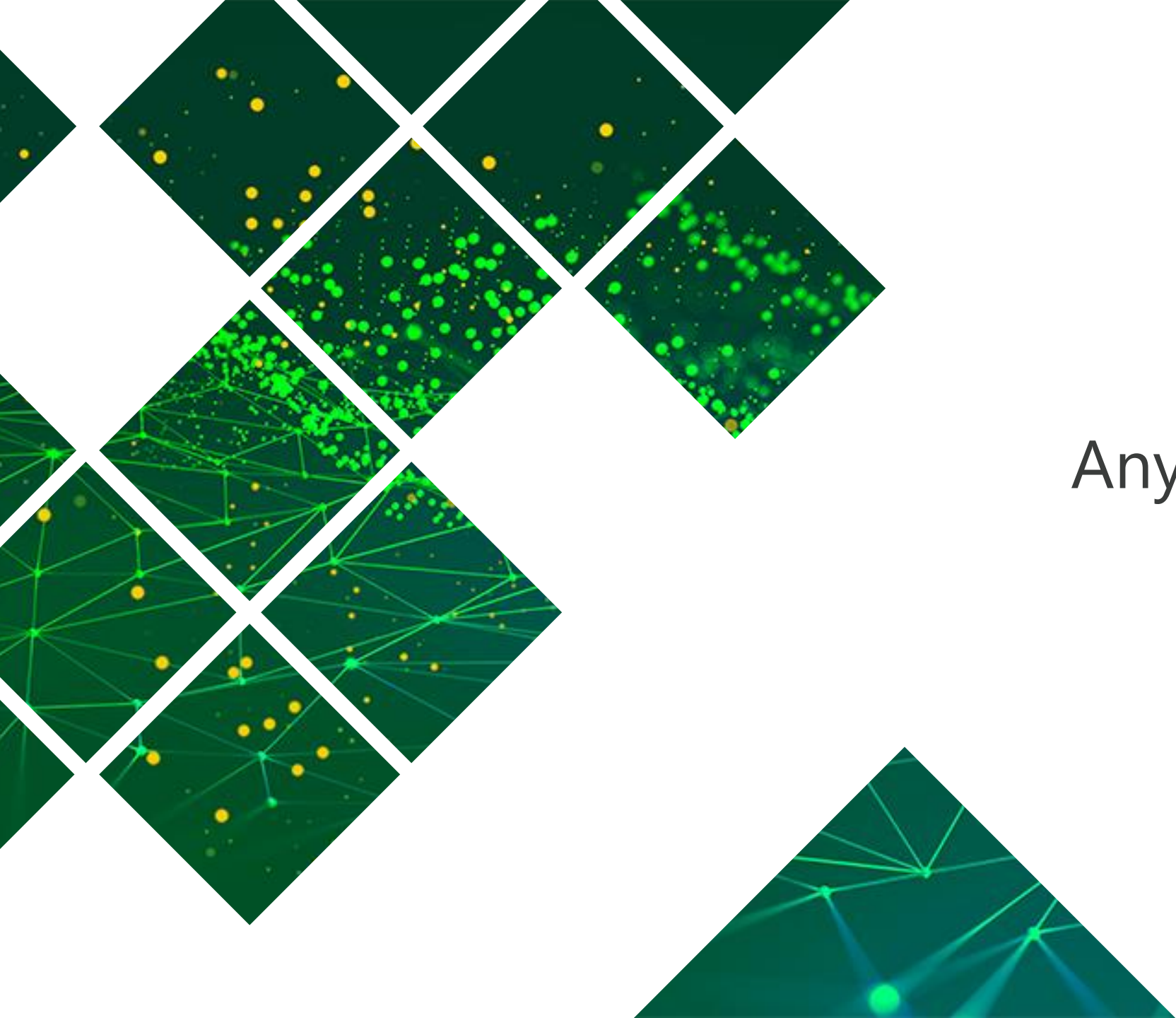
Any further comments or questions?





# Next Steps





Thank you for  
listening

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Any further comments?

# MP275 'Section K changes to support 4G Communications Hubs rollout'

Georgie Severin

Raised by Jonathon Helyer from the Data Communications Company (DCC)

# Objectives of the Working Group

NOTE

The Refinement Consultation responses

AGREE

The next steps



# Refinement Consultation key points



## Consumer impact

*"Impact on consumers will be positive, as the proposed charging framework provides a better commercial 4G model."*

*"The level of socialised industry costs [...] may lead to increased consumer costs. If [...] modest, then the net value to consumers may be justifiable."*



*The DCC must commit to being transparent about the changes in CH fixed and CH explicit charges (i.e. Stock Level and CH Returned charges). We would expect DCC to provide an explanation of CH charging variances [...] and update the QFF ToR now as a sign of commitment to provide the variances.*



# Refinement Consultation key points

## Implementation costs

£100k - >£1m



## Lead times

No lead time – A few weeks



(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.

(d)

Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

(g)

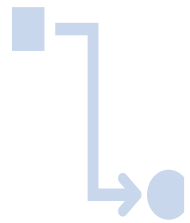
Facilitate the efficient and transparent administration and implementation of this Code

*While there is no cost to implement the modification itself, the changes to the way Comms Hubs charges are calculated would result in changing costs.*



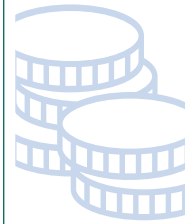


# ■ Assessment of Change



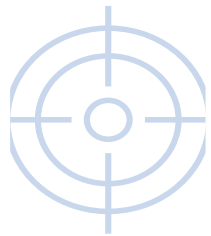
## Impacted Parties

- Suppliers



## Costs

- SECAS implementation costs
- Consequential costs to Parties - £100k - £1m



## Target Release

- Ad hoc SEC Release
- One WD following Authority Decision



## Benefits

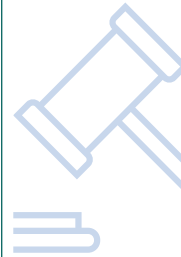
- More efficient process
- Don't need to exchange Devices

# Summary of Support



## Solution

- Respondents overall supported



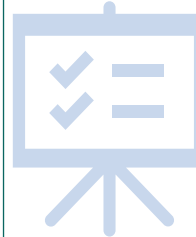
## Legal Text

- Further work to include comments received



## Support

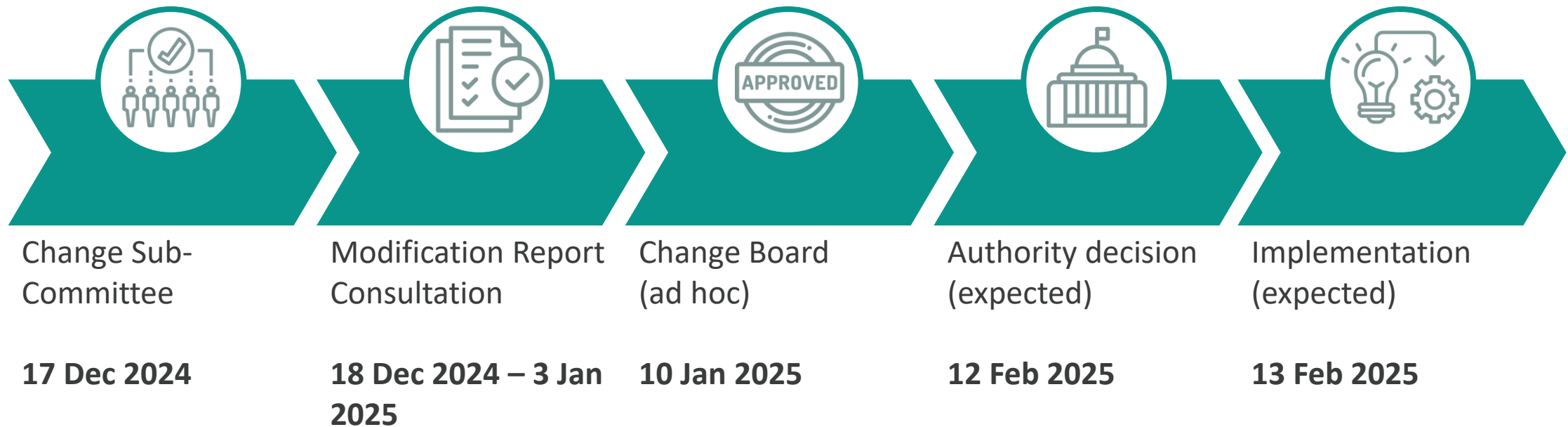
- Respondents highlighted some concerns and feedback

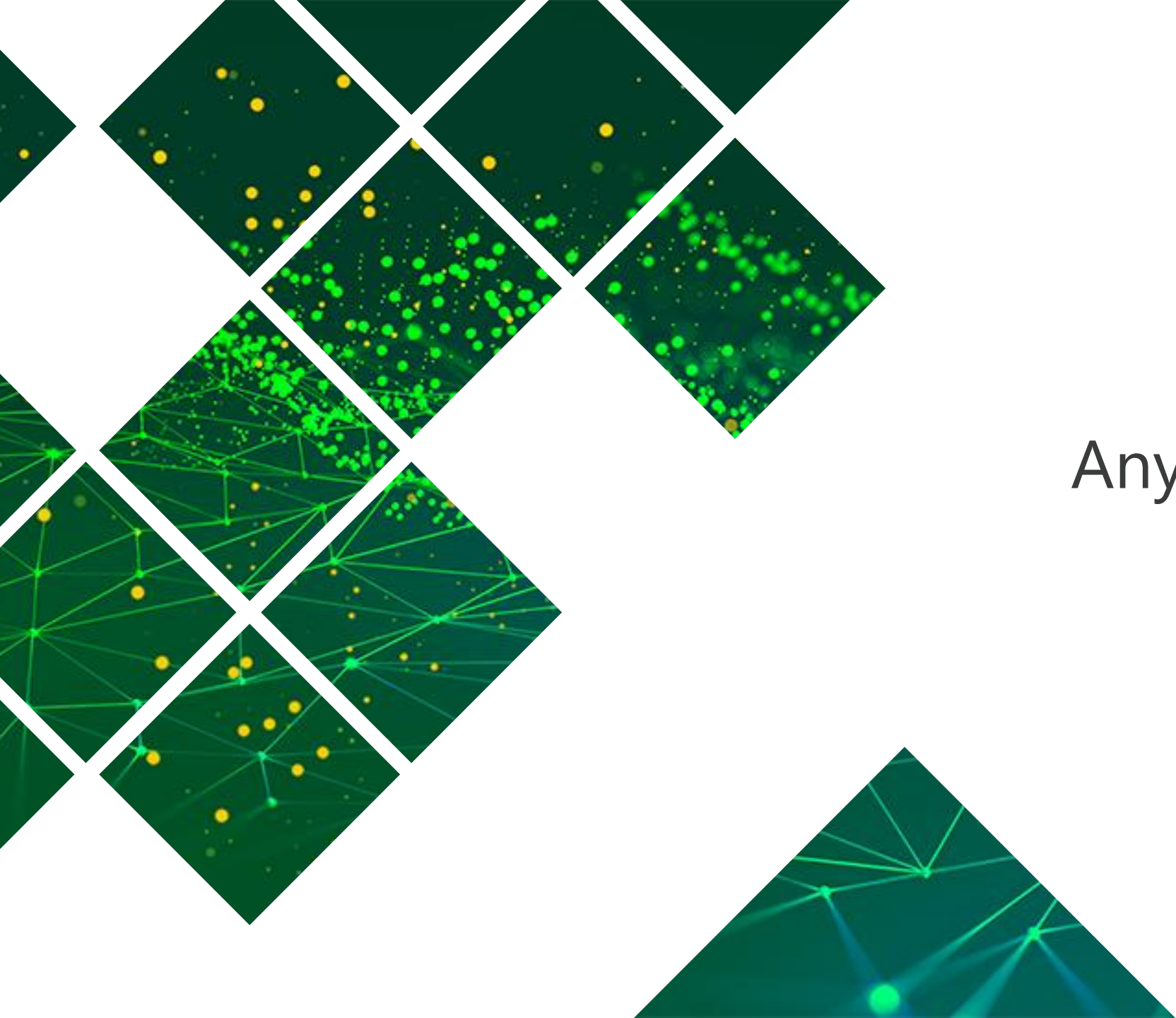


## SEC Objectives

- (a), (b), (d), (g)

# Next Steps





Thank you for  
listening

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Any further comments?

# ■ Any other business

Simon Grimwood



# 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 to listen on our [website](#) or [LinkedIn](#)

A solid green vertical bar is positioned to the left of the 'Thank you' text.

# Thank you for attending

The next meeting will be on  
Wednesday 15 January 2025