

Stage 02: Initial Modification Report

What stage is this document in the process?

01	Modification Proposal
02	Initial Modification Report
03	Draft Modification Report
04	Final Modification Report

SECMP0008:

Provision of a DCC Alert (formerly Service Request Error Response) for Quarantined Service Requests

This Modification Proposal seeks a new DUIS Service Request error response to give DCC Service Users visibility of quarantined Service Requests following a breach of the DCC's Anomaly Detection Threshold and / or the individual DCC Service User's Anomaly Detection Threshold.



The recommendation is that this Modification should be

- progressed as a Path 2: Authority Determined; and
- proceed to the Refinement Process.



Medium Impact:

This Modification Proposal impacts the DCC User Interface Specification (DUIS) and Threshold Anomaly Detection Procedures (TADP).

It impacts Energy Suppliers, DCC, Registered Supplier Agents, Electricity Distributors, Gas Transporters, and Other Users.

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Any questions?

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About this document

This document is an Initial Modification Report. It has been issued to the SEC Panel to enable the Panel to carry out its initial consideration of the Modification Proposal.

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1. Summary of Modification Proposal

This section provides an overview of SECMP0008. For further details on the Modification Proposal, please refer to the following subsequent sections of this document.

Defined terms and acronyms used in this Initial Modification Report are listed for reference in the Glossary (Section 9) of this document.

1.1 Summary of Modification

The Proposer seeks to replace the current email based Service Request (SR) error response with a new DCC User Interface Specification (DUIS)-based SR error response. This new SR error response would give DCC Service Users details of any SR that has breached the Anomaly Detection Threshold (ADT).

1.2 Proposed Solution

The new SR error response would need to provide the error type data (ADT breach) as a minimum. It is expected the structure of the SR error response message would be aligned to DCC alerts as defined in DUIS:

- DCC Alert Header Format.
- DCC Alert Body Format. This would include:
 - The new DCC Alert Code for ADT breaches.
 - Granular detail of the quarantined SRs.
- DCC Alert Signature.

The Threshold Anomaly Detection Procedures (TADP) SEC Subsidiary Document would need to reflect the new SR error response process above. It currently covers the email notifications process.

1.3 Impacts

The proposed modification will impact DCC Users that can send DUIS Service Requests and are subject to the DCC's Anomaly Detection Threshold process. Therefore it will impact DCC's systems and DCC Users' systems and the security provisions / obligations associated with these systems.

Impacted SEC Subsidiary Documents are likely to include, inter alia:

- DUIS.
- TADP¹

1.4 Targeted Implementation Date

The Proposer targets implementation in a release as soon as possible after DCC Live, and has considered Release 2.0 (scheduled for June 2017) or as soon as reasonably practicable thereafter. The Working Group will consider whether the implementation

¹ It is acknowledged that some SEC Subsidiary Documents are not yet designated. However, the DCC and industry are working to a baselined set and references here are to that baseline, where applicable. Similarly, some SEC text and SEC Subsidiary Documents are pending revision, subject to consultation conclusions. It is anticipated that these baselined SEC Subsidiary Documents and any future SEC changes will have been finalised by the time this Modification completes its Refinement Process, and the Modification will be applied to the latest version of the SEC/SEC Subsidiary Document at the time of implementation.

timetable is appropriate (see Supplementary Questions in the Terms of Reference in section 6 below).

1.5 Release Management and Testing Requirements

This Modification falls under the Panel Release Management Policy. The testing requirements will be further informed in the Refinement Process and form part of the Working Group considerations. Implications for Device testing or Assurance Certificates are the responsibility of the relevant SEC Party.

1.6 Proposed progression

This Modification must go through the Refinement Process pursuant to SEC Section D3.9(c). Section 6 of this document contains a detailed timetable and the Working Group constitution and objectives.

2. Why Change?

2.1 What is the issue?

The DCC design for its Anomaly Detection Threshold process details that when a SR is quarantined due to an ADT breach, DCC Service Users will be notified of quarantined SRs via an email notification. The process then assumes that DCC Service Users will extract a file of quarantined SRs (from the DCC's SharePoint website) to review. Each DCC User will then assign a specific action per SR before returning the file to the DCC to perform said action(s).

The email notification approach means there will be no SR error response from the DCC to that impacted DCC Service User. There are a number of issues with this approach, including:

- The creation of a dependency on manual intervention for email monitoring both in and out of hours by DCC Services Users. This will involve developing and managing additional processes (e.g. managing inbound notifications from the DCC by having additional notifications in internal systems that go to specialist on-call users). The process would also need to involve manual analysis. This increased manual activity will require an uplift in resourcing / skills, knowledge and DCC awareness across DCC Service Users' internal service management functions which will incur additional costs on DCC Service Users.
- The need for DCC Service Users' staff monitoring notification emails to have the capability to identify quarantined SRs that might be critical and therefore reacting in a timely and efficient manner. This would need specialist knowledge for staff both in and out of hours, including manually accessing the DCC's SharePoint website and extracting the data to aid with the resolution of the problem.
- The potential for DCC Service User Systems to continue to resend SRs to the DCC whilst complex analysis is being undertaken up to the point at which either:
 - a. the DCC User System sending the requests times out;
 - b. the anomaly is identified and mitigations are implemented; or
 - c. the anomaly is released within the DCC.
- Based on the current anomaly detection solution scenario "a" is most likely to occur. This will result in a significant increase in the number of anomalous events which occur within the DCC process, potentially requiring additional complex analysis to associate all events to a common incident.
- DCC Service Users' service desk agents and out of hours staff will need to be Authorised Responsible Officers. This extends the scope of the security clearance controls and the number of personnel requiring security clearance. The DCC's ability to determine / react to a central ADT breach which impacts all DCC Service Users and requires their timely intervention.



What's the issue?

The current email based system of notification is vulnerable to human error as it depends on manual intervention.

3. Proposed Solution

This Modification Proposal seeks to create a new SR error response that DCC Service Users can use to access details of, and react to, quarantined SRs due to an ADT breach.

The response would align to the existing DCC alert structure. This comprises:

- A header
- The body, including an alert code and detail of the quarantined SR
- An alert signature.

The Proposer considers that as there is already a system of DCC Service Users receiving and managing alerts it will be relatively straightforward to add in a new alert type.

The Proposer also notes that the new error code will have advantages to the DCC and Service Users for several reasons. Firstly, as it no longer relies on email communication, it is more robust in terms of the security obligations of the SEC, especially those surrounding use and control of systems that are defined as User Systems.

Secondly, as well as removing the overhead that email causes to System Users (because of the level of monitoring and manual intervention that needs to be provided), providing this response for quarantined SRs will improve the level of error detail available for them to build their own Systems to analyse and respond appropriately to the error reports.

Thirdly, it minimises the need for significant numbers of support staff to be trained in dealing with the error responses. This is because there would only be a limited need for a training program for out of hours support staff to be created to deal with quarantined error responses. Removing the reliance on auto forwarding and mailboxes will remove the possibility that error responses will be dealt with by resending the same message containing the original SR back to DCC, which increases the risk that there will be an inadvertent ADT breach as the system thinks that the message has been dropped.

3.1 Legal Text

The necessary amendments to the SEC and relevant SEC Subsidiary Documents will be prepared during the Refinement Process.



What's the solution?

A new SR error response to be created, containing granular detail of the quarantined SR.

3.2 Applicable SEC Objectives

How the Modification Proposal would better facilitate achievement of the SEC Objectives

SEC Objective	Proposer views
(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain	This Modification Proposal would facilitate the achievement of the General SEC Objectives (a) because: • It would allow the DCC Service User to develop much more intuitive systems that have the ability to monitor and alert at a granular SR level. It would provide for a proactive approach to throttling SR demand where necessary from internal systems – therefore minimising needless threshold breaches, overhead in manual resolution and general system / process inefficiencies. It would allow DCC Users to manage SR forecasts and processes around the ADT effectively. • It reduces the dependency on the use of email, mailboxes, auto-forwarding rules and the need for specific / detailed DCC service knowledge for both in and out of hours support staff. This is essential for DCC Service Users as there is a huge risk that DCC Service Users' internal systems will assume messages have been dropped and thus a DCC Service User will keep resending the original SR to the DCC. There would be no specific need for a significant number of in and out of hours staff to become Authorised Responsible Officers. However, a DCC Service User may develop an "on-call" process for the limited occasions when SRs go into quarantine. Thus only a small number of Authorised Responsible Officers may be required within Users' internal service management teams. • This Modification Proposal would allow DCC Service Users to better deliver their obligations by having a fit for purpose, efficient, and effective process in place for managing quarantined SRs. Provision of a SR error response for quarantined SRs gives DCC Service Users a more responsive level of notification compared to email notifications (which is a significant overhead for DCC Service Users' internal service management functions). It removes the requirement for manual intervention in systems that fall within
(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code;	

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How the Modification Proposal would better facilitate achievement of the SEC Objectives

the scope of DCC Service User systems and necessitate minimal manual intervention.

This Modification Proposal would facilitate the achievement of the General SEC Objectives (f) because:

- The recommended change in solution is more secure in terms of meeting the SEC security obligations including those specified around the deployment and control of systems within the scope of 'User Systems'. It would allow DCC Users to react to breaches of the ADT in a timely and efficient manner. This Modification Proposal will have a positive impact on the management of quarantined SRs – specifically relevant to the SMIP security requirements.
- It is also worth noting that the Transitional Security Expert Group (TSEG) under Transitional Governance has previously agreed with the approach proposed in this Modification Proposal.

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4. Impacts & Costs

The following section sets out the initial assessment of the likely impacts arising from SECMP0008. Additional impacts may be identified by the Working Group in the Refinement Process.

4.1 Impacts

The following is provided as an indication of likely impacts as known at this time. The Refinement Process will further inform the effects of SECMP0008.

Material Impact on Greenhouse Gas Emission

Although it would be difficult to quantify whether there is a material impact on Greenhouse Gas Emissions, the Proposer considers this modification will have a positive impact on reducing greenhouse gas emissions. This is because it negates the need for additional personnel to deal with email notifications (especially out of hours) at DCC Users' offices, and therefore reduces transport to and from, as well as the use of, facilities at these offices.

Impact on Parts of Smart Energy Code or SEC Subsidiary Documents

SEC Sections, Schedules of Appendices (Subsidiary Documents) likely impacted	Potential Impact
DUIS	DUIS would need to include a new SR error response message for quarantined SRs and for that to be aligned to DCC alerts as defined in DUIS: - DCC Alert Header Format. - DCC Alert Body Format – this would include: - The new DCC Alert Code for ADT breaches. - Granular detail of the quarantined SRs. DCC Alert Signature.
TADP	The TADP SEC Subsidiary Document would need to reflect the new SR error response process above. It currently covers the email notifications process.

Impact on other Codes and documents

No other Energy Codes will be impacted.

Impact on Smart Energy Code Party Categories

Potential Impact	Party Category
The proposed change will impact all DCC Users that can send DUIS Service Requests and are therefore subject to the DCC's Anomaly Detection Threshold process.	Large Supplier Parties
	Small Supplier parties
	Other SEC Parties
	Electricity/Gas Network Parties



Are there any impacts?

Yes. There will be an impact on DCC and User Systems, as DUIS will need to be amended.

Impact on DCC Systems (subject to DCC assessment)	
Area of DCC impacted	Potential Impact
DCC	As the proposed change will impact DCC Users that can send DUIS SRs, and are therefore be subject to the DCC's Anomaly Detection Threshold process, it will impact DCC Systems, DCC Users' Systems and the security provisions / obligations associated with these Systems. As DUIS will need to be amended, the DCC would need to support the drafting of these changes, through input into the Working Group discussions.
Data Service Provider (DSP)	To be informed through the Refinement Process.
Communications Service Providers (CSPs)	To be informed through the Refinement Process.
Trusted Service Provider (TSP)	To be informed through the Refinement Process.

Impact on other Systems	
Area of impact	Potential impact
User Systems	As the proposed change will impact DCC Users that can send DUIS Service Requests, and are therefore subject to the DCC's Anomaly Detection Threshold process, it will impact DCC Systems, DCC Users' Systems and the security provisions / obligations associated with these systems.
Smart Metering Systems	To be informed through the Refinement Process.
Other (e.g. Security and PKI)	To be informed through the Refinement Process.

Other Impacts	
Area of Impact	Potential Impact
Security	To be informed through the Refinement Process.
Key Infrastructure (SMKI, IKI, DCCKI)	To be informed through the Refinement Process.
Costs	To be informed through the Refinement Process.

4.2 Costs

The costs of implementing SECMP0008 will be identified as it progresses through the Refinement Process. These costs will capture indicative DCC implementation costs as provided in their impact assessment responses, and any SEC Party costs (where provided during the relevant consultations).



**When will the
Modification be
implemented?**

June 2017

5. Implementation

The Proposer's implementation target date is June 2017, with a contingency for November 2017 if appropriate. During the Refinement Process, it may become clearer whether June 2017 is achievable under the implementation timetable. In this event, the Working Group should identify this as part of their deliverables and this has been incorporated into the supplementary considerations in section 6.5 of this document below.

5.1 Modification Testing Requirements

The Panel Release Management Policy notes that, as part of the Panel's considerations of a Modification Proposal and the associated implementation timetable and date, the Panel will consider what testing is required and who will be eligible to participate. SEC Section H14 requires the DCC to make provision for Modification Proposal implementation testing as part of its Testing Services.

The testing requirements under the Panel Release Management Policy are yet to be fully defined. It is anticipated that this Modification Proposal may require testing consistent with SEC Section T arrangements for:

- i. DCC testing (Systems Integration Testing – SIT); and
- ii. Interface Testing (IT) with a representative number of Users and DCC to demonstrate the capability of the DCC solution to interoperate with User Systems.

In both cases, the approach for SIT and IT will be informed during the Refinement Process, hence SECAS has added this aspect to the considerations of the Working Group (see section 6.5 of this document below).

It is noted that the final testing scope and arrangements will be integrated under the Panel Release Management Policy approach for "R2".

6. Progression

6.1 Modification Path

Based on the initial review of the Modification Proposal and subsequent discussion with the Proposer, SECAS recommends that the appropriate Modification Path is: Path 2 - Authority Determined.

This Modification is likely to have a material effect on the functionality of Smart Metering Systems, and is likely to have a material effect on competition/commercial activities connected with the supply of energy.

6.2 Progression route

The Refinement Process is required for this Modification Proposal because the Proposer has identified that it affects DCC Systems, User Systems, and Smart Metering Systems, which are the SEC criteria for following the Refinement Process (see SEC Section D3.9(c)).

The Refinement Process (SEC Section D6) requires that a Working Group is established by the Panel to undertake the Refinement Process. In outline, the objectives of the Working Group are to:

- Consider the effects of the Modification Proposal on participants, Emissions and Other Energy Codes
- Evaluate, develop and refine the content of the Modification Proposal, including where the Working Group considers an Alternative Proposal may be relevant, prepare and submit this into the Refinement Process with the Proposers Modification Proposal
- Evaluate, and amend if applicable, the proposed implementation timetable of the Modification Proposal including with regard to consistency with the Panel Release Management Policy
- Obtain and take into account the views of other relevant Sub-Committees (Technical Sub-Committee (TSC), Security Sub-Committee (SSC) or the SMKI Policy Management Authority (SMKI PMA))
- Obtain assessments from the DCC as to the impact and costs
- Consider the SEC Objectives that may be better achieved if the Modification Proposal was implemented
- Conduct a Consultation(s)
- Consider any representations made to the Working Group by SEC Parties
- Deliver a Modification Report to the Panel in respect of the Modification Proposal

6.3 Working Group membership requirements

SEC Section D6.3 sets out that a Working Group must be at least 5 members with relevant expert knowledge. Therefore we propose that the Working Group should be made up of:

- The Proposer or a person nominated by the Proposer as a duly authorised representative of the Proposer;
- Working Group members:
 - who are broadly representative of the Users likely to be affected by the Modification Proposal, so that the Refinement Process is well informed in this case Suppliers and the DCC, although other interested SEC Parties may come forward

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- with relevant experience and expertise in relation to the subject matter of the Modification Proposal (TSC expertise need not be duplicated as this may be achieved through co-ordination between the Working Group and TSC);
- A Chair (see following section of this document)
- A Secretary (provided by SECAS)
- A Modification Analyst (provided by SECAS)

The Working Groups can also be attended by:

- DCC representatives;
- Ofgem representatives;
- DECC representatives; and
- Any interested members from the TSC (or its Technical and Business Expert Community (TBEC)).

6.4 Convening the Working Group

It is noted that SEC Section D6.3 makes provision for the Panel, with the cooperation of the Parties to establish a standing list of persons with potentially relevant experience who may be willing to serve on Working Groups. As Modification Paths have only recently been enabled, such a standing list is not available to the Panel.

Therefore it is recommended that an open invitation is issued at this time, with a view to using this exercise as a means of identifying the constitution of any future standing membership that can be called upon as a Modifications Working Group.

Modification Working Group members are required to meet the SEC requirements to confirm in writing to SECCo that they agree to serve on that Working Group and to do so in accordance with this Code.

Working Group Chair

SEC Section D6.4 enables the Panel to request that SECAS provides the Chair for the Working Group. While the Modification Process is further bedded down, it is proposed that, to facilitate convening the Working Group in the first instance, SECAS provides the Chair. The Working Group, once constituted, may then proceed to appoint a Chair from within its Membership, if that is the majority view of the Members. This optionality would only be available at the first meeting to preserve continuity.

6.5 Working Group Terms of Reference

To meet the requirements of the Refinement Process set out in SEC Sections D6.8-D6.14, draft standard Terms of Reference are provided in Appendix B of this document. The following questions have been identified for the Working Group to consider in order to fully assess the Modification Proposal.

Working Group Terms of Reference – supplementary questions to consider

What is the materiality of the issue?

Is the solution proposed in this SECMP0008 more efficient than the current command set?

Are there other deficiencies in the current solution that are addressed by SECMP0008?

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Working Group Terms of Reference – supplementary questions to consider

Which of the two methodologies set out in SECMP0008 is the preferred approach?

What are the detailed changes to the SEC and/or SEC Subsidiary Documents to support this SECMP0008 (and it's Alternative(s))?

What are the systems impacts for DCC/User/Smart Meters?

What are the costs and lead times to introduce the solution in this SECMP0008 or it's Alternative(s)?

Is the implementation timetable appropriate?

Are Consumers impacted by the proposed (or any Alternative) solutions and to what extent?

What Modification Implementation Testing is required to implement the proposed Modification, or any Alternatives?

What are the implementation steps and activities required to implement the proposed (or an Alternatives) Solution?

6.6 Timetable

As the Modifications Process has only recently been activated, the timetable in Figure 1 below was put together in discussion with the Proposer and SECAS as a good faith estimate. A number of assumptions underpin this timetable:

- The Proposer has requested that the Modification Proposal is implemented in Release 2.0.
- The proposed timetable below has been built around a June 2017 implementation date, noting that the implementation date may need be flexible to accommodate the necessary implementation (and testing lead times), if the Modification is approved.
- The proposed timetable includes some assumed timescales for the turnaround of DCC's Impact Assessments and the Authority determination based on the indicative timescales provided by these entities.
- If the changes associated with this Modification require EC Notification, the proposed timetable does not currently capture the three month 'stand-still' during EC notification. This is on the basis that any representations received during the stand-still need not necessarily result in any material change to the notifiable document or agreed solution in any way.
- The timetable has been drawn up based on this Modification Proposal progressing without cancellation or suspension under the [Smart Metering Implementation Programme: Guidance on Secretary of State involvement with industry-led modifications to the Smart Energy Code during the transition to enduring governance](#) guidance issued by DECC.
- The timetable assumes that any Panel Sub-Committee input can be fed into the Refinement Process at the appropriate time, and this may be subject to alteration.

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Modification Timetable	
Activity	Date
Modification Proposal raised	March 2016
IMR considered by Panel	11 March 2016
Working Group meetings Indicative activities: - Initial considerations - Legal drafting - Sub-Committee feedback - Alternative(s) identified - Impact Assessments - Detailed evaluation	March 2016 – July 2016
Working Group Consultation	August 2016
Final Working Group meeting Indicative Activities: - Consultation response summary - WG deliverables met - Assessment for Modification Report	August 2016
Panel reviews Modification Report	9 September 2016
Modification Report phase consultation	September 2016
Change Board vote	19 October 2016
Modification Decision by the Authority	November 2016
Implementation	June 2017

Figure 1: Modification Timetable

6.7 Grouping this Modification Proposal with others

There are a number of Modification Proposals that are currently entering the SEC process that have implications for a similar set of SEC Parties and SEC Subsidiary Documents. It may be possible to bring efficiencies into their Refinement Process under one Working Group. For example, whilst the underlying content may not be directly related, each solution entails opening the Technical Specifications. There may be merit in grouping these under the Terms of Reference for a single Working Group so that the implications of changes to the Technical Specifications are consistently understood for the future.

SECAS is of the view that this is entirely consistent with the aim in the SEC of establishing standing Members to serve on Working Groups and will offer both value for money for the Panel budget and a reduction in commitment by Working Group Members who might otherwise have to attend several meetings to progress each Modification discretely.

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SECAS considers that there may be potential to group this Modification with others for consideration by one Working Group and recommends that the merits of this are explored further when issuing the invitations for the Working Group.

7. Panel Initial Assessment

The Panel is requested to **NOTE** the contents of this paper for SECMP0008 and, pursuant to SEC Section D3.6, **AGREE** the following as set out in this Initial Modification Report:

- whether to accept the Modification Proposal;
- it is a Path 2 Modification (taking into account the view expressed by the Proposer);
- that it is necessary for the Modification Proposal to go through the Refinement Process as set out in Section 6.2 of this document;
- to establish a Working Group with the membership and Working Group Chair as set out in Section 6.3 of this document;
- The supplementary considerations for SECMP0008 to supplement the standard Working Group Terms of Reference set out in Section 6.5 of this document;
- The Modification progression timetable set out in Figure 1 of Section 6.6 of this document;
- whether SECMP0008 should be considered together with any other current Modification Proposal(s); and
- The potential to group SECMP0008 with other Modifications to gain efficiencies in the Refinement Process across a number of potential changes to the Technical Specifications.

8. Further Information

More Information is available in:

- Attachment **A**: Modification Proposal
- Attachment **B**: Working Group Terms of Reference

For further information, please see the [Modification Register](#) page of the SEC website.

Or contact the Code Administrator at secas@gemserv.com.

9. Glossary

The terms listed in the below table are defined in SEC Section A.

Glossary	
Term	Acronym
Anomaly Detection Threshold	ADT
Communications Service Providers	CSP
Data Communications Company	DCC
Data Service Provider	DSP
DCC Key Infrastructure	DCCKI
DCC User Interface Specification	DUIS
Electricity Smart Metering Equipment	ESME
European Commission	EC
Home Area Network	HAN
Impact Assessment	IA
Initial Modification Report	IMR
Public- Key Infrastructure	PKI
SEC Modification Proposal	SECMP
Secretary of State	SoS
Security Subcommittee	SSC
Service Request	SR
Smart Energy Code	SEC
Smart Energy Code Administrator and Secretariat	SECAS
Smart Energy Code Company	SECCo
Smart Metering Key Infrastructure	SMKI
Sub Committee	SC
Subsidiary Document	SD
Technical Sub-Committee	TSC
Threshold Anomaly Detection Procedures	TADP