

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

SECMP0010:

Introduction of triage arrangements for Communications Hubs

The Proposer seeks to permit SEC Supplier parties to carry out basic 'triage' checks on Communications Hubs following their removal from a consumer's property.



The recommendation is that this Modification Proposal should: be progressed as a Path 2: Authority Determined Modification Proposal.

This Modification Proposal should: be progressed through the Refinement Process.



Medium Impact:
This Modification Proposal impacts SEC Supplier Parties, the DCC and their Communications Service Providers (CSPs).

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SECMP0010

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04 March 2016

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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.

1. Summary of Modification Proposal

This section provides an overview of SECMP0010. For further details on the Modification Proposal please refer to subsequent sections.

Defined Terms and acronyms used in this document are listed for reference in the Glossary (Section 8) of this document.

1.1 Summary of Modification

The Proposer seeks to allow SEC Supplier Parties to undertake 'triage' on Communications Hubs.

1.2 Proposed Solution

The proposed solution is to amend the SEC arrangements and DCC Systems risks to enable SEC Supplier Parties to make basic checks on Communications Hubs when they are returned to them due to a fault when being installed or being removed from the site. Additionally, the solution would allow the checking of Communications Hubs which display a fault during commissioning.

1.3 Impacts

As SEC Supplier Parties would be checking the Communications Hubs either as they are returned or during commissioning they will be impacted. The SEC may well be impacted via their arrangements, and the DCC (and their CSPs) by way of their systems risks, which would both need either amending or reviewing.

1.4 Targeted Implementation Date

The Modification Proposal targets implementation in a release as soon as possible after DCC Live, and proposes the Modification Proposal is considered for Release 2.0, currently scheduled for June 2017

1.5 Release Management and Testing Requirements

This Modification Proposal falls under the SEC Panel's Release Management Policy. The testing requirements will be further informed during 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 Proposal must go through the Refinement Process pursuant to SEC D3.9(c) as it affects the DCC Systems, User Systems and/or Smart Metering Systems.

Section 6 of this document contains a detailed timetable and the Working Group constitution and objectives.

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2. Why Change?

2.1 What is the issue?

Currently Suppliers perform testing activities upon the return of a Communications Hub asset. Asset return may be due to its removal from site or due to a 'fault on fit' issue occurring during installation.

This activity remains essential following the commencement of the mass rollout post DCC Go-Live in 2016. However, the absence of a clear view on how this will be possible within the SEC arrangements and the DCC Systems risks making it difficult for SEC Supplier Parties to perform quality assurance, diagnostic activities and identify failure reasons for assets when they have been removed from service or returned as faulty.

SEC Supplier Parties should be permitted to carry out basic checks or 'triage' on Communications Hubs following their return from a consumer's property. Currently, the SEC arrangements do not allow SEC Supplier Parties to undertake such activity. This would result in all removed Communications Hubs being assumed to be no longer fit for purpose or re-use. The introduction of a 'triage' and recycling solution will mitigate against large costs associated with the return of good Communications Hubs to the DCC and reduce the overall costs of GB smart meter roll-out.

DECC recently commented in their document entitled 'December 2015 Government Response to previous consultations on: Stage 4 Smart Energy Code (SEC) (June 2014), March 2015 SEC Consultation and July 2015 SEC Consultation': *'We have not made provision for the proposed checking of Communications Hubs as a Communications Hub that was operating correctly when it was removed could reasonably be expected to work in future, but if Parties consider it a valuable capability that they could consider proposing a modification under the enduring SEC modification process at an appropriate point in time.'*



What's the issue?

Being unable to perform triage on Communications Hubs on return is risking large costs and inefficiencies for SEC Supplier Parties.

3. Proposed Solution

This Modification Proposal seeks to create arrangements by which SEC Supplier Parties with the ability to undertake 'triage' on Communications Hubs, and also checking of Communications Hubs which display a fault during commissioning.



3.1 Why Change

Introducing such arrangements would increase the chances of the re-use of Communications Hubs found to be salvageable, reduce overall programme costs and reduce environmental impacts associated with unnecessary disposal. Benefits will extend to Suppliers, the DCC, Meter Asset Providers (MAPs) and other industry parties.

Checks introduced by these arrangements could include determining whether the Communications Hub is capable of establishing a Smart Meter Wide Area Network (SM WAN) connection, which is not currently possible under the existing drafting of the Communications Hubs Installation & Maintenance Support Materials (CHIMSM). This prevents the DCC Users from allowing a Communications Hub to connect to the SM WAN prior to its installation for the purposes of commissioning the Device.

What's the solution?

SEC arrangements amended to allow Suppliers to undertake such activity as necessary to perform testing activities.

3.2 Legal Text

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

3.3 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	The implementation of 'triage' arrangements for Hubs will allow Suppliers to introduce best practice arrangements, enabling the identification of Hubs that are able to be recycled for future use. The new arrangements proposed by this modification would be positive in that it would save resources (time, money and environmental) by allowing Hub re-use where appropriate and by preventing the return/transport of otherwise fit for purpose Hubs around the country for disposal. With Suppliers and MOPs using their own triage facilities, rather than automatically returning all Hubs to the DCC, it will be a more efficient, economic and co-ordinated use of resources and allow the DCC to continue their mandated business with limited change. The reuse of Hubs should lower the charges payable for the Mandatory Business Services as money is not wasted transporting, triage and sending out perfectly good Hubs. The new triage process could also mean less Hubs are ordered and manufactured as Hubs stay in the supply chain.
(b) the second General SEC Objective is to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence.	

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Are there any Impacts?

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

4. Impacts & Costs

The following section sets out the initial assessment of the likely impacts arising from SECMP0010 if the Modification Proposal is subjected to the Refinement Process, additional impacts may be identified by the Working Group.

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 SECMP0010.

Material Impact on Greenhouse Gas Emission

The Proposer believes this Modification Proposal should have a positive impact on Greenhouse Gas Emissions.

Impact on Parts of Smart Energy Code or SEC Subsidiary Documents

SEC Sections, Schedules of Appendices (Subsidiary Documents) likely impacted.	Potential Impact
SEC Section F: Smart Metering System Requirements	These sections relate to Hub installation and maintenance, and would need to include an amendment which allows for the testing and/or triage of Hubs in situ.
Appendix I: Communications Hubs Installation & Maintenance Support Materials documentation	

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 working group will be required to clarify the impacts upon SEC Supplier Parties, however it is anticipated that Suppliers, CSPs and the DCC will be impacted.	Large Supplier Parties Small Supplier parties Other SEC Parties Electricity/Gas Network Parties

Impact on DCC Systems

Area of DCC impacted	Potential Impact
DCC	As the proposed change will impact DCC Users that deal with Hubs in every stage of their life cycles, it will impact DCC systems and DCC Users' systems and the security provisions / obligations associated with these systems.

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	DCC will 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 (CSP)	To be informed' through the Refinement Process
Trusted Provider	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 deal with Hubs in every stage of their life cycles, it will impact DCC systems and DCC Users' systems and the security provisions / obligations associated with these systems. DCC will need to support the drafting of these changes, through input into the Working Group discussions
Smart Metering Systems	To be informed' through the Refinement Process
Other (e.g. Security and PKI)	To be informed' through the Refinement Process

4.2 Costs

The costs of implementing SECMP0010 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).

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5. Implementation

The Proposer has requested that this Modification Proposal is implemented in the first release after DCC-live. This is currently expected to be 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 below.



When will the Modification be implemented?

June 2017

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 H14 requires the DCC to make provision for Modification Proposal implementation testing as part of its Testing Services.

This Modification Proposal is anticipated to require testing consistent with the SEC (v4.8) section T arrangements for:

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

In both cases, the approach for SIT and IT will be informed during the Refinement Process.

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.

6.2 Progression Route

The Refinement Process is required for this Modification Proposal as 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 D3.9(c)).

The Refinement Process (SEC D6) requires that a Working Group is established by the Panel to undertake the Refinement Process. In outline, the objectives of the Working Group is 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 (TBSC, SSC,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 Parties; and
- Deliver a Modification Report to the Panel in respect of the Modification Proposal.

6.3 Working Group Membership Requirements

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;
- No less than 5 other Working Group Members with relevant experience and expertise in relation to the subject matter of the Modification Proposal (noting that the Technical Sub-Committee expertise need not be duplicated as this may be

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achieved through co-ordination between the Working Group and the Technical Sub-Committee);

- Any interested Members from the Technical Sub-Committee (or sub-groups), notwithstanding the duplication issue raised above;
- Any interested Members from the Security Sub-Committee (or sub-groups);
- Any other 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;
- A secretary resourced by SECAS to see to the administrative needs of the Working Group (who shall be non-voting); and
- A Chair (see below).

The Working Group can also be attended by:

- DCC representatives;
- DECC/Ofgem representatives (as applicable)

6.4 Convening the Working Group

It is noted that SEC 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

Section D6.4 enables the Panel to request that SECAS provides the Chair for the Working Group. While the Modification process beds 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 set out for Working Group's in SEC Section D6.8-D6.14, standard Terms of Reference are provided in Appendix B. In addition, the following questions have been identified for the Working Group to consider to fully assess the Modification Proposal.

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Working Group Terms of Reference – supplementary questions to consider

What is the materiality of the issue

Is the solution proposed in this SECMP0010 more efficient than the current command set

Are there other deficiencies in the current solution that are addressed by SECMP0010

Which of the two methodologies set out in SECMP0010 is the preferred approach

What are the detailed changes to the SEC and/or SEC Subsidiary Documents to support this SECMP0010 (and its 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 SECMP0010 or its Alternative(s)

Is the implementation timetable appropriate

Are Consumers positively or negatively 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 Alternative(s)?

What are the implementation steps and activities required to implement the Proposed (or an Alternative) Solution(s)?

How the views of the relevant Panel Sub-Committee been taken into account?

Has the Refinement Process identified any potential reason that this Modification (or its Alternatives) may require EC Notification (noting that the Authority will determine if any such Notification is pursued)?

The above is not intended as an exhaustive list and it is expected that the Working Group will identify and address any other considerations that arise during the Refinement Process.

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 June 2017;
- The proposed timetable below has been put together based on a June 2017 implementation date, noting that the implementation date may need to be flexible to

accommodate the necessary implementation and testing lead times, if the Modification Proposal is approved;

- The proposed timetable includes some assumed timescales for the turnaround of DCC's detailed Impact Assessments and Authority determination, based on the indicative timescales provided by these entities;
- If the changes associated with this Modification Proposal require EC Notification, the proposed timetable does not currently factor in the three months required to complete this, and which would occur after a Change Board vote or any Authority (SoS) approval process;
- The proposed timetable has been up based on this Modification Proposal progressing without cancellation or suspension under [DECC's guidance](#) criteria for such circumstances; and
- The timetable assumes that any Panel Sub-Committee inputs can be fed into the Refinement Process at the appropriate time, and this may be subject to alteration.

Modification Timetable	
Activity	Date
Modification Proposal raised	1 March 2016
IMR considered by Panel	11 March 2016
Working Group meetings Indicative activities: • Initial considerations • Legal drafting • Sub-Committee feedback • Alternative(s) identified • Detailed evaluation	March – July 2016
Working Group Consultation	July 2016
Final Working Group meeting Indicative activities: • Consultation response summary • Working Group deliverables met • Assessment for Modification Report	August 2016
Panel reviews Modification Report	September 2016
Modification Report phase consultation	September 2016
Change Board vote	19 October 2016
Modification Decision by the Authority	November 2016

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Modification Timetable	
Implementation	June 2017

6.7 Grouping this Modification Proposal with others

There are a number of Modification Proposals that are currently entering the SEC Modification process that have implications for a similar set of Parties and SEC Subsidiary Documents. It may be possible to bring efficiencies into their refinement 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.

SECAS considers that there may be potential to group this SECMP0010 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 SECMP0010 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 SEC Section 6.2;
- To establish a Working Group with the membership and Working Group Chair as set out in Section 6.3;
- Whether SECMP0010 should be considered together with any other current Modification Proposal(s);
- The supplementary considerations for SECMP0010 to supplement the standard Working Group Terms of Reference as set out in Section 6.5;
- The Modification Proposal progression timetable set out in Figure 1 of Section 6.6; and
- The potential to group SECMP0010 with other Modification Proposals 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
Communication Hub Installation & Maintenance Support Materials	CHIMSM
Communications Service Providers	CSP
Data Communications Company	DCC
Data Service Provider	DSP
DCC Key Infrastructure	DCCKI
DCC User Interface Specification	DUIS
European Commission	EC
Impact Assessment	IA
Initial Modification Report	IMR
Meter Asset Providers	MAPs
Public- Key Infrastructure	PKI
SEC Modification Proposal	SECMP
Secretary of State	SoS
Security Subcommittee	SSC
Smart Energy Code	SEC
Smart Energy Code Administrator and Secretariat	SECAS
Smart Energy Code Company	SECCo
Smart Meter Wide Area Network	SM WAN
Smart Metering Key Infrastructure	SMKI
Sub Committee	SC
Subsidiary Document	SD
Technical Sub-Committee	TSC

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