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SEC Panel Sub-Committee Report

1. Purpose and highlights

This paper provides the Panel with an update on recent activities from the Panel Sub-Committees, including key issues discussed, and details specific points the Sub-Committees would like to bring to the Panel's attention. The Panel is requested to note the updates and endorse the concerns raised by the Sub-Committees.

Highlights for the Panel's attention include:

- **The responsibility for maintaining migrated SMETS1 CHs:** This item was raised at the OPSG. A large Supplier indicated they believed this should be with the DCC; the DCC disagreed with this view. Given such maintenance is bound to be needed this matter will need to be resolved.
- **DSP Re-procurement:** The DCC presented their 5 Options for the new DSP at the TABASC 86 meeting, which requested further detailed information on scalable costs in order to make a business assessment on the proposed options. The DCC returned to TABASC 86X with more detail and the TABASC. An extraordinary OPSG meeting was held to discuss the DSP Options on the 20 February 2023 to reach an OPSG view on the DSP Options.
- **CTG:** The Communications Transition Group (CTG) held its first meeting on Friday 17 February and discussed the ways of working, the draft workplan for initial tasks, the draft structure for the RAID log, and update from DCC on 2G/3G sunsetting.

2. Communications Transition Group (CTG)

2.1 CTG Highlights

The CTG had its first meeting on Friday 17 February. It covered how the new Sub-Committee would work, the draft workplan for initial tasks and the draft structure for the Risks, Assumptions, Issues and Dependencies (RAID) log, an update on DCC's 15 February "CH Policy Development" workshop, and a DCC status update on 2G/3G sunsetting.

Ways of working

The CTG agreed on the value of working together alongside DCC and BEIS to foster a collaborative approach to manage this critical and complex transition.

Draft workplan for initial tasks

The CTG agreed with the draft workplan for initial tasks, with minor suggestions made to ensure SMETS1 is appropriately captured (from a CSP N perspective on ensuring Long Range Radio copes with additional demand from replacements to SMETS2) and long-term future proofing (beyond 4G) is noted for a future piece of work for direction by SEC Panel.

Draft structure for the RAID log

The CTG agreed with the draft structure of the Log, with minor suggestions made to ensure separation of impacts from the description field and to utilise the existing SECAS RAID Log template. Key items to include into the RAID log will be the DCC update to the Register of Questions transferred over from the OPSG.

Update on DCC's 15 February "CH Policy Development" workshop

An update on this was provided to the CTG including key takeaways for CTG to note. The CTG agreed on the importance of engagement with the DCC and that they should be well engaged before policy decisions were considered and made. It was suggested that CTG should be used as an initial discussion and engagement group to help inform DCC's thinking before DCC engages wider with its customers as the need arises. It was agreed CTG members would be added to DCC future workshops invites to ensure wider awareness. DCC plans to engage with CTG especially to progress initial discussions on the approach for IPV to prove it is fit for purpose before ordering Comms Hubs and initiating the deployment of 4G Comms Hubs.

DCC status update on 2G/3G sunsetting

The CTG discussed how the DCC would go forward with the transition and that it should work with customers to understand what was needed for the transition. DCC noted that there would be three key streams to bring to the CTG: 4G Comms Hub transition and logistics, 2G/3G sunsetting and Mobile Network Operators assurance plans, and feedback from DCC customers on risks and issues..

CTG members discussed the issues with previous Comms Hub delivery programmes and agreed the need for DCC to demonstrate that previous lessons learnt have been incorporated into the 4G Comms Hub delivery.

Other items

The CTG Chair and SEC Panel Chair to have further discussions with BEIS to ensure alignment especially around IMF related interactions with CTG in respect of any potential changes to the DCC's LC13B plan and/or the related IMF JIP milestones.

3. Technical Operations

3.1 TABASC Highlights

The TABASC met twice in the last month. The meeting covered the following topics:

The DCC presented the TABASC with the five proposed options being considered as part of its DSP procurement activity, which the TABASC discussed. The TABASC noted that of the five options, Options 3, 4 & 5 were architecturally identical.

The DCC returned to the 86X meeting to address actions raised at the 86 meeting and provided an update on the extent to which the architectural Options proposed for a future DSP solution will deliver User-identified Business Needs, the DCC also highlighted any benefits attributed to each of these options. The DCC provided a high-level explanation of some of the factors it considered when

undertaking its qualitative and quantitative analysis of the value of the business needs it presents to DCC Users. The TABASC noted the update and provided feedback, noting that feedback from the session once agreed with TABASC members, would be delivered to the SEC Panel for consideration in accordance with the Programme Assurance Policy.

At TABASC 86, the DCC provided an update on the CFDA and its Network Traffic Management Strategy. In particular, the TABASC discussed the live operational issue relating to delayed delivery of the N56 Alerts and recommended that the DCC present an interim solution prior to any forward strategy being implemented and noted the update.

At TABASC 86, the DCC informed the TABASC of the reasoning behind their proposal to undertake BCDR testing in October 2023 and not at the earlier date of July. The DCC also acknowledged that customer communications post any BCDR exercise, needed more clarity. The TABASC noted the update.

At TABASC 86, SECAS presented the TABASC with a Scoping Paper to ascertain SEC impacting issues that relate to the introduction of hydrogen into the gas network, the TABASC provided feedback to SECAS that it would be useful to identify the Target Operating Model and noted that further clarity on the policy direction in regard to Hydrogen innovation using the smart metering infrastructure could be provided by BEIS in the future. The TABASC noted the update.

At TABASC 86, SECAS presented the TABASC with its findings from the analysis of potential BAM hosting options as well as user tracking statistics related to the live BAM and recommended that the BAM is provided as a linked PDF for the next year. The TABASC agreed with SECAS' recommendations.

At TABASC 86X, the DCC provided an update on the CSP.N Scaling and Optimisation activities, specifically in regard to progress made on the Impact Assessment carried out on the Technical Options which are being considered for implementation in Phase 3. The TABASC noted the update.

3.2 TAG Highlights

The TAG met twice during the last month to discuss the following topics in addition to the regular testing updates:

Communications Hub & Networks DBCH Testing Approach Document

The DCC provided the TAG with the Communications Hub and Networks (CH&N) Testing Approach Document (TAD) for approval, highlighting several changes which had been made following TAG feedback at TAG97X. The TAG reviewed the changes to the document and approved the updated version of the CH&N TAD.

Communications Hubs & Networks Test Coverage Document

The DCC provided the TAG with the CH&N Test Coverage Document (TCD), alongside Coverage Traceability Documents (CTDs) for Communications Hub (CH) Pre-Integration Testing (PIT), Data Service Provider (DSP) PIT, and Device Manager PIT. The TAG reviewed the documentation provided and highlighted areas where additional information could be included. The TAG emphasised that the critical discussions would occur when it came to review the Systems Integration Testing (SIT), elements of the TAD, and that the benefit of the discussions which occurred around PIT would only be seen when SIT discussions occurred. The TAG subsequently conditionally approved the CH&N TCD as presented, with only one condition to include additional information regarding why specific Devices had been selected to be used for testing.

June 2023 SEC Release Testing Approach Document

The DCC provided the TAG with the June 2023 SEC Release TAD for review and approval, highlighting several changes implemented following TAG approval during the TAG96 meeting. The DCC presented the updates made across the TAD and provided the TAG with the rationale behind the changes made. The TAG approved the proposed amendments.

SMETS1 Secure Uplift 3.3 TAD

The DCC provided the TAG with details of Smart Metering Equipment Technical Specification 1 (SMETS1) Secure Uplift 3.3, intended to address issues around SMETS1 Gas Smart Metering Equipment (GSME) migrations. The TAG reviewed and subsequently approved the proposed approach to testing and governance.

3.3 Operations Group Highlights

The Operations Group met twice in the last month. The topics covered included the following:

Increase in Alerts The OPSG noted that the volume of alerts is again increasing, having previously been brought under control. The OPSG will consider the causes and remediations for this in more detail.

FOC BCDR Testing: The DCC proposed that it will perform the Trilliant/DXC BCDR failover and failback tests in one date on 5 March 2023. The DCC noted that it will review the outcomes of this test, with a view to adopting the approach in other BCDR tests.

The OPSG endorsed DCC's BCDR proposal.

Annual Outage & BCDR Plan 2023/2024: The DCC noted that this draft plan includes a reduction in additional outage hours from 66.56 hours in the current year to 12 hours. The DCC noted that it will return to the OPSG for further review and endorsement of the schedule at the March meeting (OPSG 90).

Protecting the DCC Service Policy: The DCC noted that it introduced a policy to protect the DCC service where high User activity impacts the service e.g., high volume traffic. The OPSG requested that the DCC provide specifications (including principles and scenarios) showing the operational implementation of this policy. The OPSG agreed that, as the 'system operator', the DCC has the right and obligation to protect the integrity of the service.

WNC CH Issues - PDP Drop and Whitelisting:

PDP Drop: Regarding the WNC PDP Drop Incident (INC000000848418), the DCC outlined that 126K Devices are currently impacted. There is currently no root cause identified; however, the DCC noted a firmware upgrade will mitigate this issue. The DCC noted that following 4.1.0.4 firmware release any new instances of No PDP will self-recover within 5 days (credit mode), and 1 day (prepayment mode). Impacted Devices which have not been updated to the new firmware versions will continue to recover at approximately 20% or more per month.

Whitelisting: Regarding the HAN Whitelist Incident (INC000000832699), the DCC noted that 4.0.0.7 firmware release mitigated further instances, however 19.9K Devices are still impacted and may need to be replaced.

All CH Type Faults: SECAS reported that DCC's Communication Hub (CH) Fault rate over the last year was 0.03% for Central and South, and North regions. The OPSG noted this is below 0.5% of the total number of CH installed in these regions. Therefore, in accordance with the SEC Sections F9.17 and F9.18 compensation will not be triggered. The OPSG noted that these provisions rely on the

physical return of faulty Devices. The OPSG were disappointed to note that the costs of rectifying faulty WNC CHs would therefore fall upon Suppliers.

Temporary Communications Hub Ordering and Delivery Rules (TCHODR): The DCC presented the outcome of the consultation to extend the TCHODR. OPSG were informed that all consultation responses DCC received were in favour of the implementation of TCHODR to cover delivery months from April 2024 - September 2024. The OPSG supported DCC's proposals on this topic. The DCC noted that it will present the TCHODR to the SEC Panel on 28 February 2023 for final endorsement.

CSP N Scaling and Optimisation: The DCC reported that as part of the Phase 2 plan, the DCC will progress with the technical Options 1 (Increase in Radio Frequency (RF) Channels) and Option 4 (Request an Impact Assessment to support the Modulation Rate Increase to 4FSK. The OPSG requested that the DCC confirm the cost of increasing RF channels.

The OPSG asked that DCC brief them on the operational impacts of the proposed enhancements, including impact on capacity in comparison to forecast demand. The OPSG noted that this work is no longer covering broader issues of capacity provision and solutions such as consideration of shifting peak demand on the service.

GBCS 4.1 Update: The OPSG noted and supported the proposed reordering of the readiness of firmware for different manufacturers' Devices.

The DCC outlined the impact of including First Pallet delivery and processes. The DCC noted that they intended to consult on the plan including such options. The OPSG supported the proposal to consult. The OPSG queried why a manufacturer had been excluded. The OPSG requested that the DCC provide a breakdown of the cost of first pallet as part of the consultation, e.g., implementing single pallet for only Single Band or Dual Band or both types of CHs.

T3 Trials: SECAS relayed the outcome of the T3 Aerial trials sponsored by BEIS. The OPSG members commented on the challenges of the process, including the difficulties faced coordinating site visits with other parties. BEIS noted that it intended to further engage with Suppliers in March 2023.

DSP Options: An extraordinary OPSG meeting was held to discuss the DSP Options where further information was requested from DCC. The OPSG noted that there will be an extraordinary meeting on 20 February 2023 to reach an OPSG view on the DSP Options.

FOC Trilliant Performance: The OPSG discussed the current issue affecting some migrated FOC SMETS1 Devices where blank gas meter reads are returned. DCC stated that they do not believe that maintaining migrated SMETS1 Devices is their responsibility, while a large Supplier indicated they believed this should be in DCC's domain. The broader issue of the responsibility for maintaining SMETS1 CHs was raised. The issue is due to be discussed at the Technical and Business Design Group (TBDG) on 15 February 2023 with output to be fed back to OPSG.

4. Security Sub-Committee and SMKI PMA

4.1 Assurance and Compliance Status Decisions

The SSC set the compliance status for three Full User Security Assessments (FUSA), five Verification User Assessments (VUSA) and one Security Self-Assessment (SSA) in January 2023. Details can be found in the confidential Appendix A.

4.2 Remediation Plans and Director's Letters

The SSC reviewed two Remediation Plans and Director's Letters following FUSA's and one Remediation Plan and Director's Letter following a VUSA in January 2023.

4.3 SSC Highlights

CPA Monitoring

SECAS presented the SSC with an update on withdrawn Certificates and the expiry of Commercial Product Assurance (CPA) Certificates. The SSC were also presented with the latest Pre-Payment (PPM) Report and an update on Pending figures.

Due to potential Consumer impact, the SSC agreed to defer the removal of affected Devices originally planned for 27 January 2023, subject to affected Suppliers providing a named Responsible Owner to be accountable for a Remediation Plan to ensure that affected Devices are upgraded, and to provide regular reporting of progress to the SSC who will keep the removal from the CPL under review.

ECoS CIO Assurance Timetable

The DCC CIO presented the SSC with a proposed timetable for reporting assurance to the SSC on ECoS preparations as required by the DCC Licence.

DCC Updates

The DCC presented SSC with the following updates and reports for which the SSC noted and provided feedback on security related issues:

- DCC CIO Procurement Update
- Security Incident Management Actions
- PKI Enduring Service – Business Needs
- Communication Hubs Limitations (EM357)
- PKI Enduring Service – Business Needs
- Post Commissioning Report
- Anomaly Detection Report
- API Gateway Design Proposals
- Silabs Communication Hubs Risk Assessment

Unit Inconsistency SMETS2 Meters

The DCC provided an update on a unit inconsistency in SMETS2 Meters. The SSC noted the update and agreed that there is no security concern.

BEIS Consultation: Changes to SEC/Licence

The SSC were provided with an update on the BEIS Consultation on changes to the SEC/Licence. The SSC noted the consultation proposes changes to:

- SEC Modifications
- SSC/SMKI PMA Chairperson Appointments
- Enduring Change of Supplier (ECoS) Related Changes
- Discontinue the obligation on the DCC to publish the Enduring Change of Supplier (ECoS) Interface Specification on an enduring basis.
- ECoS Migration Reporting Regime (EMRR)
- ECOS Migration Error Handling and Retry Approach (EMEHRA)

The SSC noted the update and had no objections to the proposals.

4.4 SMKI PMA Update

SoLR Process

The SMKI PMA Chair confirmed there have been no Supplier of Last Resort (SoLR) events since the previous SMKI PMA meeting.

tScheme Outcome (FOC)

The DCC presented the SMKI PMA with an interim report of the outcome of the Final Operational Capability (FOC) component of the tScheme audit. The SMKI PMA noted the update.

PKI Enduring Services Interim Report

The DCC presented the SMKI PMA with the Private Key Infrastructure Enduring Services (PKI-ES) interim report. The SMKI PMA noted the update.

SMKI / DCCKI Nomination Forms

The DCC provided the SMKI PMA with an update on potential changes to the SMKI and DCC Key Infrastructure (DCCKI) Nomination Forms. The SMKI PMA deferred approval of changes to the SMKI and DCCKI Nomination forms.

24 Hour Revocation Process

The DCC presented the SMKI PMA with details of its proposal to provide support for out-of-hours SMKI Organisation Certificate revocation.

SMKI Key Testing and Replacement

The DCC presented the SMKI PMA with an update on the management of DCC-owned certificates. The SMKI PMA noted the update.

CH&N Signifiers

The DCC provided the SMKI PMA with details of signifier allocation for the Communications Hubs and Networks (CH&N) programme. The SMKI PMA endorsed the DCC's proposal.

5. SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) met on 7 February 2023. At the meeting, the outcomes of the SMDA November 2022 SEC Release and SMDA Test Scenarios Consultation were presented. Seven responses were received from Large Suppliers, Network Parties, Meter Asset Provider (MAP) and Manufacturer Other SEC Party representatives.

The SMDASC agreed to recommend all 14 test scenarios (plus an additional change to include Prepayment to Credit mode testing) as well as the changes to testing to align with the November 2022 SEC Release, to the SEC Panel and SECCo. Board for approval.

In addition, the Scheme Operator (SO), SECAS, SMDASC representatives and SEC Panel Project Sponsors met on Wednesday 15 February 2023 to discuss the direction of the SMDA review options. A project brief was developed to provide a clear direction for the review which was circulated to attendees.

6. Recommendations

The Panel is requested to:

- **NOTE** the contents of this paper; and
- **ENDORSE** the concerns raised by the Sub-Committees.

Charlotte Riddick
SECAS Team
28 February 2023

Attachments:

- **Appendix A:** User Security Assessments – Identified Non-Compliances (**RED**)