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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 OPSG emphasised its concerns about the impact of the 8 major incidents which occurred in March, following the five such incidents in February. The OPSG asked DCC to prepare a plan setting out expectations for improvements in the short to medium term.

2. Communications Transition Group (CTG)

2.1 CTG Highlights

No meeting has taken place during the reporting period.

3. Technical Operations

3.1 TABASC Highlights

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

OMS & Logistics

The DCC presented its proposals to implement its to-be Order Management System (OMS) to order 4G Communications Hubs (CH) to replace the OMS currently in place for ordering 2G/3G CHs. The TABASC requested that the DCC provide further clarification on when existing 2G and 3G orders will be transitioned to orders for the new 4G CH, and how this will take place.

Systems Engineering at DCC

The DCC presented its proposals for its new Systems Engineering approach, noting their plan to align with the INCOSE standard and make use of the BiZZDesign tool. The TABASC noted this update.

3.2 TAG Highlights

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

GBCS 4.1 CH3 SIT Test Completion

The DCC provided the TAG with the SIT Test Completion Report (TCR) for the Great Britain Companion Specification 4.1 (GBCS 4.1) Communications Service Provider (CSP) Central and South Communications Hubs 3 (CH3) release. The TAG reviewed the Testing Issues (TIs) proposed for exclusion, and assessed testing against the agreed upon Exit Criteria. The TAG approved the proposed TI exclusions, and conditionally approved test completion for GBCS 4.1 CH3 should actions taken in the meeting for the DCC to amend the TCR be completed and signed off by the TAG Chair.

ECoS SIT Test Completion

The DCC provided the TAG with the SIT TCR for the Enduring Change of Supplier (ECoS) release. The TAG reviewed the variances in Test Scope and the TIs proposed for exclusion, and assessed the TIs not proposed for exclusion to ensure appropriate Severity rating categorisation. The TAG approved test completion for ECoS.

CH&N SMWAN CTD

The DCC provided the TAG with the Coverage Traceability Document (CTD) for the Smart Metering Wide Area Network (SMWAN) Pre-Integration Testing (PIT) element of the Communications Hubs and Networks (CH&N) Test Coverage Document (TCD). The TAG reviewed the CTD and approved both the CTD and the baselining of the TCD as presented.

SMETS1 Uplift 3.3 Secure Approach to Testing Revision

The DCC presented the TAG with its proposed revision to the Smart Metering Equipment Technical Specification 1 (SMETS1) Uplift 3.3 Secure Approach to Testing. The TAG reviewed the proposed changes and approved the amendments to the Secure Uplift 3.3 Approach to Testing.

Northbound Prioritisation

The DCC presented the TAG with an update on Northbound Prioritisation. The TAG reviewed the overview provided, and the details of the proposed Approach to Testing the DCC provided. Concerns were raised around several elements of Northbound Prioritisation, however the TAG acknowledged some of the concerns raised lay outside the TAG's remit as they were design issues.

3.3 Operations Group Highlights

The Operations Group met twice in the last month, and the Performance Measurement Review Group met once. The topics covered included the following:

Incidents

The DCC reported 8 Major Incidents in March 2023, following 5 major incidents in February; further, over the last 2 years there has been an average of 2-3 major incidents per month.

It was noted that many of the incidents related to events outside "normal" operation, that is BCDR testing and maintenance (including further problems related to the DSP technical refresh activities).

The OPSG recognised DCC's focus on this topic and the improvement efforts being made but expressed concern on the lack of reliability with the service and have emphasised the need for DCC to plan and set out expectations for near/medium term improvements.

Business Process Indicators

The OPSG noted the decline in success rates for the Tariff Update and Firmware Activation business processes: DCC agreed to investigate.

DSMS Procurement Update

The OPSG noted the seven business needs for the DSMS. The DCC noted that the prospective product suppliers had confirmed that they are able to deliver the mandatory business needs through the RFI process. The OPSG highlighted the need to include requirements to support User needs and SEC requirements.

DCC Service Non-Compliance

The OPSG noted the list of 5 non-compliances, noting that 3 non-compliances had been closed within the last quarter. The OPSG noted that additional outages outside of the SEC allowance should be included as a non-compliance.

OMS and Logistics Programme Update

The OPSG were briefed and gave feedback on User requirements.

Future DSP Programme Update

The OPSG noted the feedback following the workshop to discuss Option 3 transition. The DCC advised that there will be a subsequent workshop on Options 4 & 5 and they will return with further feedback at that point.

CH Delivery Supply Chain – Forward View

The DCC reported that there are no foreseen CH delivery issues over the next 12 months. The DCC noted that CSPs have fulfilled 100% of orders in March and April 2023. The OPSG noted that the requirements for the 4G CH supply chain should be reviewed, in particular in relation to ordering flexibility for SEC Parties.

GBCS 3.2 Update

The OPSG noted that this was now moving into operation and it would be necessary to identify the appropriate reporting to OPSG.

GBCS 4.1 Update

The OPSG supported the DCC proposal to include an Initial Pallet Validation stage using refurbished devices: this provides assurance whilst containing the impact on costs and schedule.

ECoS Progress Towards Readiness

The OPSG noted that this programme is progressing according to plan, with no material issues or risks.

ACB Certificates and Introduction of Manufacturing Packs

The OPSG noted that manufacturers are concerned about the approach for introducing new ACB certificates, and the possible implications for their workload of not aligning with the ECoS programme. DCC agreed to set out a plan for the approach.

4. Security Sub-Committee and SMKI PMA

4.1 Assurance and Compliance Status Decisions

The SSC set the compliance status for two Full User Security Assessments (FUSAs), two Verification User Security Assessments (VUSAs) and two Security Self-Assessments (SSAs) in March 2023. Details can be found in the confidential Appendix A.

4.2 Director's Letters

The SSC reviewed two Director's Letters following a FUSA and two Director's Letters following a VUSA in March 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.

The SSC was also presented with an update on Pending figures and an update on Supplier CPA Remediation Plans submitted as required by SEC Appendix Z.

Security Controls Framework

The SSC was presented with an update on the User Security Controls Framework (SCF). A number of amendments have been made to Part 2 (and some minor clarifications in Part 1 regarding de-commissioning) to clarify amendments in the approach agreed following the full review of all SEC Obligations with CIO and SSC at an SCF workshop on 18 January 2023.

Triage Security Controls Framework

The SSC was presented with an update on the Triage Security Controls Framework (TSCF) to clarify that, a) It is not the intention that the (non-Use Case 004) wider triage facility premises undertaking triage should be subject to User CIO assurance, b) Metrology seals should never be broken during Triage Activities but are not covered by the CPA Security Characteristics, and c) Breach of tamper-protection of an ESME terminal cover or GSME battery cover falls within the SEC Section G12 a) description of 'essential Device maintenance and/or the decommissioning process' and does not prevent Triage Activities for that Device. The SSC approved the TSCF for publication after it had been shared at SCIRS on Monday 13 March.

SMETS1 FOC EPCL Submission

The DCC presented the SSC with the SMETS1 Final Operating Capability (FOC) Eligible Products Combination List (EPCL) submissions, noting that DCC Security is satisfied that the parent Device Model Combinations (DMC) have been subject to appropriate security testing as outlined in the relevant Depth and Breadth/Test Approach document.

The DCC CISO confirms that there are no additional security risks by adding these DMCs to the EPCL and that any existing security risks are within the DCC's risk appetite. All security assurance remediation actions have been reported to SSC with none regarded as material to the addition of these equivalent DMCs to the EPCL.

DCC CIO Assessments

The DCC CIO presented the SSC with an update on the progress of the DCC CIO assessments.

ECoS ADT Requirements

The transition to Enduring Change of Supplier (ECoS) requires some changes to setting Anomaly Detection Thresholds (ADT) and DESNZ has specifically asked for SSC assurance as part of the ECoS Live Service Criteria that this will not pose a problem for Users. SECAS provided the SSC with an update on the responses to the SSC Request for confirmation of compliance with the Enduring Change of Supplier (ECoS) Anomaly Detection Threshold (ADT) requirements. There is a risk that, following ECoS go-live, Energy Suppliers that aren't able to submit updated ADT Files automatically may only be able to update their ongoing ADT submission as part of a manual process, and not via their existing

system or adaptor provider, until such time that the changes are implemented. For non-compliant ADT files, the warning and quarantine threshold for that Service Reference Variant applicable to that User will be set to zero which will result in the Service Requests being quarantined. The information requested from Suppliers and SRPs will feed into the SSC recommendation to the Department for Energy Security and Net Zero on whether the risks pertaining to ECoS Go-Live are acceptable.

From the initial batch of responses from ten Suppliers, all but one noted that they are prepared and have plans in place. However, given that only ten Users responded to the initial request, SECAS agreed to write out with a reminder to all Users to submit their responses ASAP.

SECAS also agreed to write separately to the sole User who has raised issues, and to inform them to contact their SRP since other customers of the SRP have managed to meet the requirement. In addition, SECAS agreed to liaise with other Sub-Committees and the SEC Panel regarding ECoS ADT requirements, and to raise awareness via the SECAS newsletter.

DCC Updates

The SSC noted the following updates and reports for information provided by the DCC for information:

- Security Incident Management Actions;
- Silabs Risk Mitigations;
- PKI-E Final Report;
- Incident Management Actions (arising from Incident Management Exercise in Dec 2022);
- Post Commissioning Report;
- Anomaly Detection Report; and
- ECoS SEC Obligations G2.50 and G11.7.

4.4 SSC CPA Issue Resolution Sub-Group (SCIRS)

At the SCIRS meeting in March 2023, the following issues were discussed.

SSC Guidance on applying for Approval of Trial Devices without CPA Certification

The SCIRS Chair noted that “SSC Guidance on applying for Approval of Trial Devices for Field Trials without CPA Certification” has been approved by SSC to support the implementation of SEC Modification MP172 Reduced CPA & CPL requirements for innovation and Device field trials and was published on the SEC website on 23 February 2023.

Triage Security Controls Framework (TSCF)

The SCIRS Chair advised that the SSC Guidance for Device Security Assurance and Triage Part 3 - Triage Security Controls Framework (TSCF) has been updated to reflect the clarifications identified during the site visit to the Macquarie Meter Processing Centre. The TSCF Section 2 has a new clause 4.5 ‘SSC Clarifications’ which is also covered in TSCF Section 1 FAQ to clarify “Scope of assurance of a ‘Triage Facility’”, whilst The TSCF Section 1 FAQ and Clause 4.5 in TSCF Section 2 also clarifies issues relating to Tamper-protection Seals:

Use Cases: Deleting Device Logs

SCIRS members noted that a query raised at SCIRS on 13 February 2023 about whether Device Logs should be deleted as part of Use Case 003 (HAN Reset via a User Interface) was discussed at SSC on 22 February 2023. The query related to whether the Device Log should be cleared since there will be a record of ‘joined’ PPMIDs and IHDs that are no longer appropriate. The SSC agreed that the Device

Logs should be cleared “as appropriate” as part of Use Case 003 triage and agreed that SSC Guidance on Device Security Assurance and Triage Part 2 – for Use Cases 001 and 003 should be updated accordingly at the next opportunity.

Other SEC Party Actions

SCIRS noted that Other SEC Parties have a Quarterly Issues forum with the most recent meeting on 24 February 2023. SCIRS members were advised that most of the Issues raised predate SCIRS and that the Issues log was provided for awareness of SCIRS members. The SCIRS Chair advised that, since SCIRS is the proper forum to raise, address and resolve CPA related issues, the Other SEC Parties Forum should refer such CPA related issues to SCIRS.

Use Case 005

SCIRS noted that Use Case 005 has been present on the SCIRS agenda since July 2022, but it is also part of SEC Modification 0010 which has now been withdrawn so, therefore, does not seem to be an issue for SCIRS to pursue.

Risk Review Pilot

SCIRS members queried when the Risk Review pilot will end and could be reviewed by SCIRS, including any possible changes to the process. It was noted that it is possible that feedback from initial Risk Reviews may be available in April or May, whereupon discussions can continue.

4.5 SMKI PMA

SoLR Process

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

SMKI Key Recovery Improvements

The SMKI PMA was presented with a progress update on the implementation of improvements to the SMKI Key Recovery process, which the Sub-Committee noted.

Code Performance Measures

The DCC presented the SMKI PMA with an update on the measures and targets for Performance Measurement Report (PMR) performance measures, which the SMKI PMA noted.

PKI-E Final Report

The DCC provided the SMKI PMA with the Public Key Infrastructure Enduring (PKI-E) final report for review. The SMKI PMA discussed the report and noted the update.

SMKI Certificate Testing and Replacement Plan

The DCC presented the SMKI PMA with an update on SMKI Certificate testing and replacement, which the SMKI PMA noted.

SMKI / DCCKI Nomination Forms

The SMKI PMA Chair presented the SMKI PMA with the DCC’s proposed changes to the SMKI and DCC Key Infrastructure (DCCKI) nomination forms, and the SMKI PMA approved the proposed amendments.

24 Hour Revocation Process

The SMKI PMA Chair presented the SMKI PMA with details of the DCC’s proposal to provide support for out-of-hours revocation, and the SMKI PMA approved the proposal.

IKI Process Review

The SMKI PMA Chair presented the SMKI PMA with details of the DCC's proposal for issuance of Infrastructure Key Infrastructure (IKI) tokens, and the SMKI PMA approved the proposal.

SMKI PMA Risk Register Update

SECAS provided the SMKI PMA with the SMKI PMA Risk Register for review. The SMKI PMA reviewed the risk register and agreed to proposed amendments following discussion.

5. SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) met on Tuesday 4 April 2023, and Carmen Strickland was nominated for the role of SMDASC Chair.

In addition, the SMDASC reviewed the SMDA review problem statement and agreed the approach pending the recommendation that a clear, qualifying criteria was included to set out how the results of each phase will be determined and DCC were also included within the list of stakeholders.

Members were also updated on the options discussed by the SEC Panel to increase Scheme value by increasing testing capacity or reducing testing timescales and costs. Of the four items discussed, the SMDASC requested further information on reducing the amount of consumption data required in testing and the impacts of increasing resources to implement parallel testing. Removing lengthy tests and focussing on beneficial interchangeability testing were not supported by members.

Furthermore, the SMDASC discussed the SEC Panel enquiry on expanding access of the SMDA test scripts to all SEC Parties, including new entrants and Smart Metering Home Area Network (SMHAN) connected device manufacturers. The SMDASC believed that there was limited value to all SEC Parties, however agreed to review each request for access on a case-by-case basis. If granted access, the same process would be applied, whereby Parties sign a Non-Disclosure Agreement (NDA) to reduce the risk of a competitive Scheme being set up using the test scripts.

Finally, as discussed and agreed by the SMDASC, the Scheme Operator (SO) is to develop a proposal to introduce testing of Alternative Home Area Network (Alt HAN) bridge devices under the Scheme, and for those Devices to be awarded SMDA assurance and added to the Device Assurance Register. The proposal will be issued to the SMDASC for review and if agreed, will be circulated to all SEC Parties for consultation on the approach. Pending the result, a recommendation will be made to the SEC Panel.

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

18 April 2023

Attachments:

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