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Paper Reference:	SECP_116_2305_10
Action:	For Decision

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.

One highlight has been flagged for the Panel's attention by the OPSG:

OPSG

Further precautionary measures are being considered to ensure the smooth execution of the next price change event at the beginning of July. This is likely to include strengthening and reemphasising of guidance to Users, so as to spread the peak load at the DSP.

2. Communications Transition Group (CTG)

2.1 CTG Highlights

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

DCC Update: CH&N Programme

The DCC provided an update on the CH&N Transition to 4G Comms Hubs. The DCC gave an update from a recent workshop held on 13 April and that there were two scenarios presented: Early Forecast Cutover or Cutover at Mass Manufacture Decision. The consensus was the preference for the first scenario which will be explored further as due diligence is undertaken. DCC will also look at the cost of buffer stock and previous programmes such as dual band transition for lessons learned – and build RAG status into overview of programme. The DCC also provided an update on the engagement activities planned from March to June which will include regular updates to the CTG. These will include consideration of how to shorten forecasting timescales to provide a more accurate picture and increase understanding of where flexibility is possible under the programme, concurrently with engagement with the supply chain. The DCC agreed to provide the next update at the May CTG meeting on when it plans to formally notify vendors of its intentions regarding contracts. This will be in advance of the publication of the transitional engagement conclusions document, due in June.

CTG Risks and Issues Register

The updated Risks and Issues Register was reviewed. Comments from CTG members included that the Risk Register must contain all contracts, due dates and their extension options. A risk should be added to capture misinformation regarding the transition being shared with the press, ensuring that the

same messaging is shared consistently. The CTG also identified that engagement with Elexon is needed regarding Half-Hourly Settlement. The CTG was encouraged to provide ongoing feedback on the Register. For future reviews, members requested a cover paper be attached to the risk register explaining the changes, a deep-dive be carried out on a two-monthly basis, and clear post-mitigation scoring be applied.

CTG Stakeholder Engagement Register

The initial draft Stakeholder Register was reviewed and the CTG was asked to provide comments on the draft register by close of play Friday 28 April. The Chair agreed to provide an update on the CTG at the Small Supplier engagement call and the SEC Panel Chair, SECAS and DCC will identify DCC, Smart Energy GB and national press contacts and co-ordinate a regular update via the SECAS newsletter initially to inform SEC Parties and then the press more widely to encourage consistent and accurate messaging.

Draft Overall Transition Plan

The draft Overall Transition Plan and the next steps were reviewed.

CTG Factsheets

The CTG was updated that a series of factsheets called the CTG Factsheets on the transition will be shared and redacted as necessary to suit the intended audience.

3. Technical Operations

3.1 TABASC Highlights

The TABASC met twice in the last month, at TABASC 88X and TABASC 89. The meetings covered the following topics:

DSMS Programme Update

The DCC presented the TABASC with an update on the DCC Service Management System (DSMS) Programme, highlighting the mandatory business needs for the to-be DSMS. The DCC proposed that it would return to a future meeting to highlight any DCC User and System considerations as a result of the introduction of a new DSMS, as well as providing a view of any desirable requirements and alignment of requirements between the REC and SEC.

Over the Air (OTA) investigations

The DCC provided TABASC with its final update on Over-the-Air (OTA) investigations and presented its analysis on its three concluded work streams under the sub-categories Data Analysis, Technical Queries and Production Testing, noting that results under Workstream 1 were taken as indicative due to issues identified in the reporting. The DCC also noted that the SM122 report produced could be updated to include new OTA alert types, but this would require a SEC Modification.

API Gateway Interface Options

The DCC presented their proposal for Cloud Provider Options for their Application Programming Interface (API) Gateway, along with some reasoning for their preferred option. The TABASC queried the DCC's decision methodology for reaching its preferred option and requested that the DCC provides an understanding of what factors have been considered when choosing a Cloud Provider to support the API gateway, noting DCC's intention to contract through a third party.

Annual Outage Plan

The DCC presented their Annual Outage Plan to address the Operations Group (OPSG) action, (OPSG 90/09, "The DCC to present the slide "CSP C&S & No Prepayment Service Impact: High Level

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Architecture View” to TABASC at its next meeting), to provide a view of the High-Level Architecture for VM01 that was shared at OPSG90, showing there would be no impact to prepayment consumers.

DSP Reprourement – Northbound User Gateway Options

The DCC presented the TABASC with an update on the DSP Re-Procurement Northbound User Gateway Options for the to-be DSP, articulating its User benefits of Options 1 and 2. Furthermore, the DCC proposed a hybrid Option 3, a combination of Options 1 and 2 and agreed to return to TABASC with further clarification on all impacts and costs associated with these options and its relation to the DSP re-procurement activity.

Network Traffic Management – Northbound Prioritisation

The DCC returned to the TABASC with an update on its Network Traffic Management – Northbound Prioritisation. The DCC presented the proposed priority alerts list and the TABASC queried the reasoning behind these proposals and recommended that the audience of the consultation is broadened outside of the TABASC. The DCC agreed to return to the TABASC with an update when the consultation response deadline has been passed.

Testing Automation Framework

The DCC presented an update on its Testing Automation Framework (TAF) to the TABASC. The DCC provided an account of its ongoing progress and proposed that it would return to a future TABASC meeting with a better understanding of the High-Level business architecture associated with the changes introduced to testing as a result of the TAF programme.

3.2 TAG Highlights

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

Communications Hubs and Networks Component Integration Testing Coverage Traceability Document

The DCC presented the uplifted Communications Hubs and Networks (CH&N) Test Coverage Document (TCD), including the Component Integration Testing (CIT) Coverage Traceability Document (CTD). The TAG reviewed the CIT CTD, and approved both the CIT CTD and changes to the TCD.

Market-wide Half-Hourly Settlement Testing Approach Document

The DCC provided the Testing Approach Document (TAD) for the Market-wide Half-Hourly Settlement (MHHS) programme, including an overview of changes to the SEC introduced by MHHS and details of the scope of testing. The TAG reviewed the document and provided feedback ahead of the scheduled approval decision at May’s TAG meeting.

Treatment of Testing Issues

The DCC presented an overview of its approach to Testing Issues (TIs) closed without a retest, TIs proposed for discounting, and confirming Severities of TIs. The DCC also presented its approach to threshold assessment, and the impact of TIs on other Test Completion criteria. The TAG reviewed the DCC’s approach and provided recommendations for potential improvements to the TI process based on insights from their own approaches.

SMETS1 Uplift 2.6 (Device Swap Out) Approach to Testing

The DCC presented the Smart Metering Equipment Technical Specification 1 (SMETS1) Uplift 2.6 approach to testing. This included details of the change to be implemented, an outline of the approach to testing proposed, and details of the scope of testing. The TAG provided feedback on the approach.

TAG Risks Register

SECAS provided the TAG with the Risks Register for the Sub-Committee, which the TAG reviewed. The TAG approved the Risks Register as presented, including the addition of new risks to the register.

3.3 Operations Group Highlights

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

DCC Service Performance

The OPSG noted that the measure CPM1 (the combined metric for on demand service requests) had achieved the Target Service Level. The reported performance for DXC (which is impacted by Trilliant performance) continues to be below minimum service level for two individual metrics, and the OPSG asked the DCC to confirm what actions are being taken to resolve this.

Business Process Success Rates

The OPSG discussed the success rates of the Firmware Activation and Tariff Update business processes, which remain notably lower than other business processes. The DCC were asked to provide further analysis in June.

Use of SRV 8.11 as a Performance Metric for the Install and Commissioning (I&C) Process

In response to a request from Ofgem, the OPSG considered whether the performance of SRV8.11 was fully under the control of the DCC. The OPSG reviewed evidence from the DCC and agreed that User orchestrations impacted the performance of this SRV. The OPSG also emphasised that it is important to find a suitable metric reflecting the DCC's component of the I&C process.

DCC Operational Update (DCC)

The OPSG discussed the continuing upward trend in the ratio of SRVs per device daily average. It was noted that price change events and Other User usage contributed to this trend, but that routine use by Suppliers was also increasing. It was agreed to further review this indicator at the June meeting.

The OPSG noted that the success rates for prepayment transactions remained generally stable, being approximately 96% in Communication Service Provider North (CSPN), 97% in CSP Central and South (C&S), 98% for Initial Operating Capability (IOC), and 93% for Middle Operating Capability (MOC). There has been an improvement in SMETS1 Final Operating Capability (FOC) prepayment success, which achieved an 83% success rate for April, although volumes remain low.

Price Change Update - April Review and July Forward Plan (DCC)

The DCC reported that as a result of mitigation steps put in place following the last price change event, the DCC were able to reduce the impact of the Data Service Provider (DSP) Load Protection Mechanism. However, the service was unable to smoothly manage the peak demand experienced, and the resultant Incidents impacted the SMETS1 MOC and FOC cohorts. In advance of the July price change, the DCC will seek to identify further precautionary measures at service providers and will also reemphasise guidance for Users. These will be discussed at the next OPSG meeting.

OMS and Logistics Business Requirements (DCC)

The OPSG requested that the DCC provide clear visibility of the process it had followed for systematically establishing the business needs (mandatory and desirable) of Service Users.

ECoS: Progress Towards Readiness Update (DCC)

The DCC reported that generally the programme is on track. In the last few days an issue had been identified which may have implications for UIT: options for resolution are under assessment.

DCC Service Centre Re-procurement Update (DCC)

The DCC outline its procurement process. The OPSG noted that as the programme developed, engagement with Users would need to consider impacts on, and opportunities to improve, User facing processes.

June 2023 SEC Release: Progress Towards Readiness (DCC)

The OPSG noted that the components for the June 2023 Release were on track with no current issues.

DSP Time Out Configuration (DCC)

The DCC outlined a proposal to change the DSP Timeout configuration from 60 seconds to 8 seconds on DSP Message Gateway North. The purpose is to reduce the risk of the reoccurrence of a previous major incident. The DCC highlighted that this will be done in increments and is to be reviewed by OPSG and Technical Architecture and Business Architecture Sub-Committee (TABASC) at each stage. The DCC highlighted that there will be no costs to Service Users. In routine operations, the vast majority of traffic will be unaffected by this change: the DCC will be contacting the few Users who might notice the change (based on their observed operational pattern). The OPSG supported the proposal.

PKI-E Enduring Services (DCC)

The OPSG noted the scope and business needs of the service. The DCC highlighted that at present no operational impacts were anticipated. It was noted that the principal engagement on this programme will therefore be with Smart Metering Key Infrastructure Policy (SMKI) Policy Management Authority (PMA) and the Security Sub-Committee (SSC).

MP223 'WAN Coverage Reporting'(SECAS)

The OPSG noted the business requirements for the modification proposal.

MP235 'Enhanced Meter Data Access for Other Users'(DCC)

OPSG members raised a number of concerns regarding points of principle, including; implications for the security/privacy model; how the operational impact would be assessed; modification, implementation, and operational costs; how the business case would be formulated and assessed; and whether this proposal would be more appropriately presented as an Elective Service. SECAS will ensure these topics are considered in the modification process. SECAS noted that it will return to the OPSG at a future meeting with the proposer of the modification to outline the outcome of the Impact Assessment.

DP230 'Review the SLA for delivery and completion for SMETS1 firmware' (DCC)

The OPSG had concerns that as drafted the proposal gives a very general relaxation of the SLA for all SMETS1 devices: this is considered inappropriate. The OPSG noted that possibly the intent of this drafting was to allow for future flexibility, but the OPSG considered that this generalisation was undesirable, and should not have been tabled in this way.

Work Package: Q4 2022/23 (Jan - March) actuals (DCC)

SECAS noted that the Q4 2022/23 actuals were significantly over budget, partly due to staff turnover and the resulting transition activities. OPSG members were concerned that they were not informed of the overspend earlier. The OPSG asked for further details of the expenditure, and, asked SECAS to confirm that these are correct. The OPSG noted that the Monitoring and Assurance of DCC Services Project had concluded, and the final costs were less than originally budgeted.

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), one Verification User Security Assessment (VUSA) and one Security Self-Assessment (SSA) in April 2023. Details can be found in the confidential Appendix A.

4.2 Director's Letters

The SSC reviewed two Remediation Plans supported by Director's Letters following a VUSA and one Remediation Plan supported by a Director's Letter following a SSA in April 2023.

4.3 SSC Highlights

User Self-Assessments on Decommissioning

The SSC noted that the User CIO has extracted the Self-Assessment section on Decommissioning from the User Security Controls Framework into a standalone document that is now available to Users.

DESNZ Consultation on 'Delivering a Smart and Secure Electricity System'

The SSC noted that on 30 March 2023, the Department of Energy Security and Net Zero (DESNZ) published the [Government Response to the consultation on 'Delivering a Smart and Secure Electricity System'](#), which SSC contributed to.

SECAS Engagement Events

SECAS notified SSC of the following events:

- SECAS and the User CIO will be hosting an event for Triage Facilities interested in undertaking security assessments to Triage Use Case 004 SMETS2 Devices in accordance with the guidelines detailed in the Triage Security Controls Framework. The event will be held online on 31 May 2023 from 10:00 – 12:00 and those interested in attending can register by emailing ssc@gemserv.com.
- A 'Greenhouse Day' is set to be hosted by the User CIO with SSC and Panel Members invited. The SSC was informed that this will likely take place near the end of 2023 and will involve both a review of the User CIO's performance and a forward look to the year ahead.

MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

SECAS presented the SSC with an update on [MP207 Allowing Registered Supplier Agents to Maintain Meter Firmware](#). The SSC noted the update and provided feedback on security.

MP168 'CPL Security Improvements'

SECAS presented the SSC with an update on [MP168 CPL Security Improvements](#). The SSC noted the update.

DCC CIO Forward Look

The SSC was provided with an update on the proposed DCC CIO Assessment Timetable, and the SSC noted the update.

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 and informed Users where specific firmware upgrade paths are required to ensure compliance.

CPA-Related Issues

The SSC Chair presented an update on CPA-related issues, including several queries from Manufacturers and Test Labs relating to CPA evaluation of Devices with Use Case 004 capability. The SSC was also provided with feedback from the SSC CPA Issue Resolution Sub-Group (SCIRS) meeting held on 17 April 2023.

DCC Consultation on ECoS

The DCC presented the SSC with an update on the DCC Consultation on proposed changes to the existing version of the Enduring Change of Supplier (ECoS) Transition and Migration Approach Document (ETMAD) (version 2.0) or Smart Energy Code (SEC) Appendix AS. The SSC noted the update and agreed that a formal response from the SSC was not required.

ECoS ADT Requirements

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, which will feed into the SSC recommendation to DESNZ on whether the risks pertaining to ECoS Go-Live are acceptable.

DCC Updates

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

- Incident Management Actions (arising from Incident Management Exercise in Dec 2022)
- Post Commissioning Report
- Anomaly Detection Report
- ECoS CIO Assurance
- DCC Service Management System (DSMS) and the application programming interface (API) Gateway
- DCC's Threat Assessment capabilities
- ECoS Anomaly Detection Threshold (ADT) requirements

4.4 SSC CPA Issue Resolution Sub-Group (SCIRS)

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

Triage Use Cases

The SCIRS Chair notified members that a query arose relating to the evaluation of the Triage Tool and Triage Interface under the CPA Build Standard and whether this needs to be at the same time as the evaluation of the Device with Use Case 004 functionality. It was previously confirmed at SCIRS in September 2022 that this was not necessary and has been clarified in the Q&A in the Triage Security Characteristics.

This should be clarified in the Test Lab's letter for SSC confirming that the Triage capability complies with the SSC Use Case Guidance. This will help in the SSC assurance of Triage Facility Providers.

It was also previously confirmed that the assurance of the Triage Tool and Triage Interface is independent of assurance of the Triage Facility by the User CIO.

ACB Certificates

SCIRS Members noted that there is a proposal from DCC to introduce new ACB Certificates, with the policy seeming to involve the rotation of certificates over a set period. Operationally this may cause issues for MAPs and manufacturers if this is not done at the same time as the ECoS Certificate changes and issue of the ECoS manufacturing pack.

The SCIRS Chair noted that a meeting had been arranged with DCC to discuss these issues, and potential solutions would be brought to the next SCIRS meeting on 15 May, when more clarity on these questions would be available.

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.

TSP Decommissioning

The DCC presented the SMKI PMA with an update on the decommissioning process for Trusted Service Provider (TSP) Public Key Infrastructure (PKI), which the SMKI PMA noted.

DSP Overview

The DCC provided an overview of the proposed new Data Service Provider (DSP) structure and transition, which the SMKI PMA noted.

DCC Consultation on ECoS

The SMKI PMA Chair provided an update on the DCC consultation on the Enduring Change of Supplier (ECoS) programme, noting potential changes to the ECoS Transitional Migration Approach Document (ETMAD). The SMKI PMA noted the update.

Certificate Management Update

The DCC provided an update on the proposed DCC processes for managing DCC-operated Certificates, which the SMKI PMA noted.

SMKI PMA Risk Register

SECAS provided the SMKI PMA Risk Register for review. The SMKI PMA reviewed the risks and noted that no risks required escalation to SEC Panel.

MP168 Proposed Solution

SECAS presented an overview of the problem and proposed solution for MP168 '[CPL Security Improvements](#)'. The SMKI PMA discussed the Modification Proposal and agreed with the recommendation to progress the modification to refinement.

5. SMDA Sub Committee

The next SMDA Sub-Committee (SMDASC) meeting will be held on Tuesday 6 June 2023. Agenda items include an update on the completion of the independent SMDA testing project for Alternative Home Area Network (Alt HAN) and next steps, as well as an update on the progress of the SMDA review.

The Scheme Operator has also determined that no changes to the SMDA test scripts are required to align with the June 2023 SEC Release.

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
16 May 2023

Attachments:

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