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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 DCC enacted suspension of services without notification to the Panel. The DCC acknowledged it had not followed the correct procedure as per the SEC and agreed to provide a formal response to the OPSG ex-committee on non-compliance including remediation actions taken.

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

DCC presented an overview of the overall plan for CH&N Transition to 4G Communication Hubs (CHs). The DCC provided updates on its programme risks and issues noting that all areas are green with the exception of PIT Exit/SIT Entry Test Phases currently tracking as Red, and Order Management System (OMS), and Business Readiness and Transition which are at Amber. DCC advised CTG that PIT Exit and SIT Start Milestones have been delayed due to testing issues found in CH firmware therefore requiring further testing cycles, however provided assurance that this should not impact Initial Pallet Validation (IPV) timescales.

DCC presented an overview of the First Phase 2 Mesh Workshop delivered on 29 November 2023 which discussed options for 2/3G Mesh swap-outs and highlighted a second Mesh Workshop will be held on 13 December 2023. DCC presented an overview of engagement for 2024 and agreed to update the Chair on when the detailed engagement plan would be available for review, for the purpose of planning relevant CTG discussions.

The CTG discussed which forum was best suited to hold 4G discussions related to OMS, noting that there is some cross over between CTG, OPSG, the Supply Chain Working Group and DCC Workshops. CTG agreed for SECAS to work with the Independent Chairs and DCC to clarify for each agenda item on the topic which part of the solution (medium term, enduring or IPV) is being discussed and how it is governed.

DCC provided an update on CH financing and advised DCC is developing a draft Outline Business Case (OBC) covering the funding of both 4G CH assets and CH Exchange costs, which would be shared with Industry in early 2024. The CTG discussed the most appropriate forum to consider CH costs, and noted concerns on whether the OBC would sufficiently capture costs and benefits for Users. The CTG agreed that CTG, in addition to the SEC Panel and Quarterly Finance Forum, would be an appropriate forum for cost discussion which the Chair will discuss with the DCC and the SEC Panel Chair.

DCC provided an overview of the Changes to the Intimate Communications Hub Interface Specification Consultation which will close on 4 January 2024. CTG discussed the limitations of the Consultation only focusing on new installs. The Chair advised a SEC consultation response would be provided which summarised Sub-Committee views and agreed that the response would highlight the expectation that further analysis should be carried out on Radio Frequency noise requirements for existing assets. CTG Risks and Issues Register The CTG noted changes made to the Risks and Issues Register and agreed to the changes and baselining of the draft as V8.1.

Draft Overall Transition Plan

Engage provided an overview of the changes made to the Draft OTP, which included updates on Energy Supplier Milestones based on discussions at the Supplier Readiness Session held on 8 November 2023, changes made to align milestones with the latest information presented at the Implementation Managers Forum (IMF), and various maintenance updates. Engage noted that there were no changes to the Plan-on-a-Page (POAP) as a result of the OTP changes, but the POAP will also be baselined to maintain consistent version numbers with the OTP.

The CTG noted the updates and agreed to the baselining of the Overall Transition Plan (OTP) and POAP as v1.6.

CTG Factsheets

The CTG noted changes made to the Green and Amber versions of the Factsheets, which included amendments covering 4G CH dimensions, and agreed to the changes and baselining of the drafts as v3.3 and v1.3 respectively.

Asset Life Brief Project

SECAS provided an overview of the Asset Life Project Brief and requested CTG agree to the scope of the project and recommend the project for approval by the SEC Panel and to SECCo Board for release of funds. SECAS noted the project aim to provide a view on the overall picture for SMETS1 and SMETS2 and produce a range of estimated costs for 4G transition activities based on different transition strategies and timescale modelling.

CTG discussed the proposed project and requested SECAS develop and circulate a paper that clarifies the problem statement and provides an illustrative example of a data set to give an indication of the project output, based on which CTG Members could then consider whether to recommend progression of the project.

3. Technical Operations

3.1 TABASC Highlights

The TABASC 96 meeting that took place this month where the following topics were discussed.

TABASC 96 DSP System Integrator Strategic Case

The DCC presented an introduction into its DSP System Integrator Strategic Case and highlighted its current scope for its Systems Integrator (SI) reprourement activity. TABASC members requested that the DCC return to TABASC with further clarification on its SI requirements and subsequent User impact.

CFDA in a Nutshell

The DCC presented an update on the scope of the DCC Cross Functional Design Authority (CFDA). The TABASC queried how its Users can meaningfully engage with the CFDA and the DCC agreed to review ways in which this can be done more effectively.

Technical Review of a number of Level 1 and Level 2 Incidents

The DCC reported on its technical review of a number of Level 1 and Level 2 Incidents and highlighted the root causes behind their occurrence. The TABASC requested that the DCC return to a future TABASC with a more detailed review of the proposed approach they will take in order to prevent a future reoccurrence of Incidents.

DCC OCA Certificate Management Policy Industry Impacts

The DCC highlighted its views on the OCA Certificate Management Policy and its impacts on Industry. The DCC noted that for the 2024 manufacturing pack, that whilst the existing Manufacturing Pack certificates for those Devices may expire in 2026, Users will be able to continue installing these Devices alongside those with the new Manufacturing Pack certificates.

S&O Project Next Steps

The DCC returned to the TABASC with a progress update on Phase 2 of its Scaling and Optimisation programme. The TABASC queried the DCC's classification of the information as RED and queried when its customers will be made aware of the full benefits of the Scheduled Read Window extension based on results from the pilot.

4G CH&N Coverage Assurance

The DCC returned to the TABASC with an update on the strategy and scope of the 4G CH&N Coverage Assurance activity. The DCC noted that a report has been commissioned to deliver connectivity evidence. The TABASC highlighted that a key focus should not only be on achieving initial connectivity, but that it should also incorporate the impact of other conditions which cause losses of signal and strive to achieve consistent connectivity to avoid incomplete installations caused by intermittent connectivity.

Proposal to remove Alert 0x8F75 from the Alert Storm Protection Exclusion List

The DCC presented its proposal to remove Alert 0x8F75 from the Alert Storm Protection Exclusion List. The TABASC noted that the alert volumes in question was significantly high in comparison to other alerts and that the proposed solution does not fix the root of the problem. The TABASC agreed with the DCC's proposal to remove this alert from the list, however the TABASC also requested that the DCC consider this issue more strategically going forward to deal with the root.

Risk Register Update

SECAS presented an update on changes made to the TABASC Risk Register and the TABASC requested that the action plan update for risk TABASC001 be reworked and simplified to better explain the Risk Title.

3.2 TAG Highlights

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

CH&N SVTAD Consultation Conclusions

The DCC presented the TAG with the conclusions from the Communications Hubs and Networks (CH&N) SEC Variation Testing Approach Document (SVTAD), which the TAG noted.

GBCS 1.1 Coverage Update

The DCC presented the quarterly numbers and percentages for Great Britain Companion Specification 1.1 (GBCS 1.1) installations in production, which the TAG noted.

TAG Risks Register and Issues Log Quarterly Review

SECAS presented the TAG Risks Register and the TAG Issues Log for quarterly review. The TAG noted the update and agreed that no further Risks required escalation to the attention of SEC Panel.

GBCS 4.2 Testing Approach Document

The DCC provided the Testing Approach Document (TAD) for GBCS 4.2 for approval. The TAG reviewed the document and approved the TAD.

ECoS Manufacturing Pack Update

The DCC presented an update on activities for the Enduring Change of Supplier (ECoS) Manufacturing Pack, including timescales for testing activity and the rationale for progressing the Manufacturing Pack without governance. The TAG noted the update.

TAG Terms of Reference Review

SECAS provided the TAG with version 2.2 of the Sub-Committee Terms of Reference (ToR), highlighting areas of major change and requesting TAG feedback ahead of submission for Panel approval in January 2024. The TAG reviewed the ToR, and discussed the practicalities surrounding the expansion of the TAG remit into User testing.

MHHS SIT Test Completion Report

The DCC provided the Test Completion Report (TCR) for Market-wide Half-Hourly Settlement (MHHS) testing. The TAG reviewed the results, endorsing the Severity ratings of outstanding Testing Issues (TIs) and the TIs proposed for discounting. The TAG approved test completion for MHHS.

MHHS Use of UIT

The DCC presented an update on the planned use of its UIT environments for MHHS testing, which the TAG noted.

June 2024 SEC Release Testing Approach Document

The DCC provided the TAD for the June 2024 SEC Release for review. The TAG reviewed the document and noted the update.

Emulator Update

The DCC presented an update on emulator usage in testing, which the TAG noted.

3.3 Operations Group Highlights

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

Alt HAN Update

The Alternative Home Area Network (Alt HAN) Company provided an update showing 935 installations so far nationwide. The DCC reported a success rate of 92-97% across all business processes but noted small volumes of failures impacting the success rates for Change of Supply in September.

MP235 – Enhanced Meter Data Access for Other Users

SECAS provided an overview of the Modification Proposal of MP235 and the proposed solution for this; the proposer provided some comments. The OPSG noted that when considering implications for traffic, the impact assessment needed consider possible scenarios for the profile of submissions and impact at peak demand.

Dual Band CHs

The Department for Energy, Security and Net Zero (DESNZ) presented the Quarterly report on the Dual Band Comms Hubs and Fylingdales Rollout Progress. DESNZ noted Dual Band Comms Hubs (DBCHs) installations are expected to increase but noted concern as currently installs are below the level anticipated: lower user demand could lead to a reduction in manufacturing capability. The OPSG commented on difficulties encountered around Fylingdales in using the WAN checker.

Ofgem Price Control

RY2022/23 (SECAS): SECAS noted that it will provide a draft response for review at the OPSG December 2023 meeting. SECAS noted it will be undertaking a thorough review of Service Quality, Engagement, and Contract management during RY2022/23 and will ask OPSG for input into this.

Removal of Alert 0x8F75 ‘Unauthorised Physical Access – Strong Magnetic Field’ H17

The DCC noted that a consultation had been carried out, and respondents had supported the proposal. The OPSG agreed to the proposal to remove Alert 0x8F75 from the Exclusion List.

OPSG Issues Log

The OPSG agreed that Candidate Issue 111 (Install & Commission Issue in CSP North) be added to the OPSG Issues Log. The OPSG noted that the details for this issue needed further development.

OPSG ToR Review

The OPSG were invited to provide comments on the proposed changes by 05/12/2023.

1 Jan Price Change Event

The OPSG noted that User Guidance would be very similar to that approved by the OPSG for October, and that therefore no further OPSG review was proposed. Users would be asked to respond by 8 December 2023. The OPSG asked that DCC again confirm that Service Providers would be ready for the event.

Suspension of Services

The OPSG noted the previous suspension of services. The DCC apologised that the SEC requirements had not been complied with. The OPSG noted an update will be given at the Panel, and a formal report was in preparation.

Comms Hubs in CSPN Losing Connectivity

OPSG members reported approximately one thousand Archiva comms hubs losing connectivity each week. The DCC noted this has not been flagged but will now be investigated.

4. Security Sub-Committee and SMKI PMA

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 (FUSAs), one Follow Up Assessment, and two Security Self-Assessments (SSAs) in November 2023. Details can be found in the confidential Appendix A.

4.2 Director's Letters

The SSC reviewed two FUSA Director's Letters, one Follow Up Assessment Director's Letter, and four SSA Director's Letter in November 2023.

4.3 SSC Highlights

The SSC also discussed the following items:

Matters Arising

- The SSC approved a material change.
- The SSC approved a change of SRP as a material change subject to SECAS reviewing security architecture once received.
- The SSC noted a self-assessment for decommissioning a User System.
- The SSC noted that NCSC has published its [Annual Review](#).
- The SSC noted that NCSC has published a White Paper on Quantum Computing on 3 November 2023 which advises: *"Technical system and risk owners of both enterprise and bespoke IT should begin or continue financial planning for updating their systems to use PQC."*

Remediation Plan Update

SECAS provided the SSC with an update on User Security Assessment Remediation Plans.

DCC CIO Forward Look

The DCC provided the SSC with an update on upcoming DCC CIO Assessments.

CPA Monitoring

The SSC Chair and SECAS provided the SSC with an update on withdrawn Certificates and the expiry of Commercial Product Assurance (CPA) Certificates, and Remediation Plan Updates.

CPA-Related Issues

The SSC Chair presented an update on CPA-related issues including feedback from the SCIRS meeting held on 13 November.

One item raised at SCIRS relates to a change in the definition of a Triage System Interface and the SSC agreed to raise a Draft Problem Statement for a SEC Modification.

CPA Risk Review – Manufacturer A Communications Hub

The SSC noted an update on the outcome of the CPA Risk Review of Manufacturer A's Communications Hub. The SSC reviewed the Risk Review and agreed the recommended mitigations are satisfactory to address the risks identified by NCSC during the CPA Risk Review.

CPA Risk Review – Manufacturer B Communications Hub

The SSC noted an update on the outcome of the CPA Risk Review of Manufacturer B's Communications Hub. The SSC agreed to approach Manufacturer B to establish if there is any potential to mitigate the risks noted in the Risk Review.

Agreed Interpretations Approval

The SSC approved the latest updates to the Agreed Interpretations subject to some changes.

CH&N Communications Hub and eSIM

The DCC provided the SSC with an update on Communications Hub and Networks (CH&N) and eSIMs.

CH&N CIO Report

The SSC noted an update on the CH&N CIO Interim Report.

Future Service Management

The DCC provided the SSC with an update on Future Service Management.

DCC Threat Report

The DCC provided the SSC with an update on the DCC Threat Report.

Threat Assessment Report

Gemserv provided the SSC with an update on the SSC Threat Assessment.

SSC Security Briefing

The SSC noted an update on the SSC Security Briefing.

MP094 'Supporting prepayment customers in no SM WAN scenarios'

The SSC noted an update on [MP094 'Supporting prepayment customers in no SM WAN scenarios'](#).

Risk Register Review

SECAS provided the SSC with an update on the SSC Risk Register, and SSC Members provided feedback and suggestions.

DCO Customer Needs

The DCC provided the SSC with an update on DCO Customer Needs.

DCC Gateway

The DCC provided the SSC with an update on DCC Gateway.

DCC Certificate Management

The DCC provided the SSC with an update on the Manufacturing pack.

SSC Budgets 2024/25

The SSC approved the SSC Budgetary applications for 2024/25.

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DCC Updates

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

- Post Commissioning Report
- Anomaly Detection Report

4.4 SSC CPA Issue Resolution Sub-Group (SCIRS)

At the November 2023 SCIRS meeting the following issues were discussed.

Matters Arising

- **MP168 (IKI File Signing for CPL entries):** The DCC reported that the URL for the CRL should be available w/c 13 November 2023 which will enable testing of the File Signing with e.g., Microsoft Products.
- **Load Controller Test Certificates:** The DCC report that the Test Certificates to test the Load Controller role should be available by the end of November 2023.
- **Trial Device Certificates:** The SCIRS Chair provided an update on the Traffic Light Protocol status for the Trial Device Application Form.

Triage System Interface Definition

SCIRS Chair provided an update on a request from a Manufacturer regarding the security around a Triage System Interface.

SMKI Certificates to be used in Use Case 004

The DCC provided an update on the SMKI Certificates to be used in Device triage in line with Use Case 004, advising of multiple issues which occur at DCC level when a triaged Device is re-installed.

The DCC advised that a SEC Modification was required to require Triaged Use Case 004 cases to be pre-notified. Before a SEC Modification is raised, MAPs requested a workshop to understand how an interim solution could be made to work and whether a long-term SEC change is needed.

The DCC and SCIRS Members organised a workshop to discuss the issues raised which was held on Wednesday 20 November.

Use Case 005 (Communications Hub Refurbishment) Update

SCIRS Chair provided an update on Use Case 005 (Communications Hub Refurbishment), noting that it has been agreed with NCSC to add Comms Hub Refurbishment to the CPA Triage Security Characteristics Overlay document and the 'SSC Guidance for Device Security Assurance and Triage', which is currently being drafted.

Future CPA Scheme

SCIRS Chair noted that DESNZ is drafting proposed SEC changes to support the Future CPA Scheme and expect to consult on these proposed changes early in 2024. The SSC budgetary requirements will be included in the Panel consultation (normally January 2024).

4.5 SMKI PMA

Matters Arising

- SMKI PMA approved a new Key Custodian as per SEC Appendix L section 3.4.3.6.
- SMKI PMA considered the impact of FIPS 186-5 on SMKI.

SoLR Update

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

Test Exercise to Correct Incorrect Certificates

The DCC presented the SMKI PMA with a progress update on the Test Exercise to Correct Incorrect SMKI Certificates. The SMKI PMA noted that the Recovery Exercise has begun.

Certificate Management Strategy Workshop Update and Proposed SEC Changes

The DCC presented an update on the Certificate Management Strategy Workshop and discussed proposed SEC Changes. The SMKI PMA agreed to hold a further workshop to discuss the details further.

MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'

The SMKI PMA noted a SECAS update on the Preliminary Impact Assessment for [MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'](#).

DCO Business Needs

The DCC presented an update on the Dual Control Organization (DCO) Programme Approach & Business Needs, which the SMKI PMA noted.

5. SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) meeting was held on 5 December 2023. At this meeting, SMDASC members were informed that Matthew Alexander had been re-elected for the role of Network Party representative.

The SMDASC were then informed of the outcomes of the SMDA Tranche Two Review workshop held on 24 November 2023, which included updates to the SECAS Guidance Note: Interoperability and Interchangeability Obligations and Expectations. The SMDASC approved the Guidance Note pending minor amendments. SECAS noted that once these changes have been made, the Guidance Note will be published on the SEC website and its existence will be communicated to all SEC Parties using the SEC and SMDA newsletters and LinkedIn.

The SMDASC also agreed to raise a modification to amend the procurement restriction in SEC Section F12.7.

Additionally, the SMDASC discussed the SMDA Revolution options and supported further consideration of a Hybrid approach to testing. It was noted that further feedback is required from Device Manufacturer Parties on this approach. The SMDASC were also encouraged to submit feedback on the High-Level Requirements which were discussed at the workshop held on 24 November 2023.

The SMDASC reviewed the Impact Assessment for inclusion of Double Band Device testing and agreed that additional investigation was required to identify the need for the changes and review additional information that was to be provided by a Manufacturer representative. A revised Impact Assessment will be provided at the next meeting on 13 February 2024.

The SMDASC also agreed that the approach to offer a flexible approach in selection Communication Hubs firmware to be used in SMDA Device testing should be updated as the SMDASC did not see the benefit in allow devices to be tested against older Comms Hubs versions. Instead, the SMDASC requested that the Scheme Operator should look at offering testing on updated versions of Comms Hub firmware.

Furthermore, the SMDASC agreed for the publication of DCC Communication SMDA testing reports along with the changes proposed to the SMDASC Terms of Reference and SMDA Change Procedure.

The aims for the SMDASC going forward is to review the strategy for the Scheme and propose a plan for SMDA 4G Comms Hubs pre-User Interface Testing (UIT).

6. Recommendations

The Panel is requested to **NOTE** the contents of this paper.

Rebecca Sawyer
SECAS Team
12 December 2023

Attachments:

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