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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:

- OMS business requirements and FSM business needs could not be endorsed during the OPSG meetings in December 2023 due to incorrect/lack of information in the papers provided. The DCC have now re-issued both ex-committee to the OPSG and they are expected to be endorsed ahead of the Panel meeting.

2. Communications Transition Group (CTG)

2.1 CTG Highlights

The CTG has not met since the previous update provided to Panel. SECAS circulated an updated Asset Life Project Brief per the request of CTG Members and CTG recommended the project ex-committee to proceed to Panel for funding approval. The CTG is next scheduled to meet on 22 January 2024.

3. Technical Operations

3.1 TABASC Highlights

The TABASC 97 meeting took place this month where the following topics were discussed.

TABASC 97 DSP Data Systems DSP SI Strategic Case

The DCC presented its DSP Data Systems SI Strategic Case and high-level requirements for its re-procurement activity following feedback received at the TABASC 96 meeting. The TABASC requested that the DCC return to a future meeting with further information on how the SI solution provider will have its deliverables assured.

Future Service Management (FSM) Requirements

The DCC returned to the TABASC with an update on the Future Service Management (FSM) Requirements. The TABASC queried the DCC's reasoning for not separating the DCC requirements from the SEC requirements within the document presented and requested that the DCC return to a future meeting with a list of SEC based requirements and proposal to change SEC requirements.

SMETS1 Dual Control Organisation (DCO) Business Needs

The DCC returned to the TABASC with a revised update on its SMETS1 Dual Control Organisation (DCO) Business Needs. The TABASC queried whether Business Needs 2 and 3 are in fact desirable in order to support DCO operations and the DCC agreed to return to the next TABASC meeting with further justification of its business needs.

Terms of Reference Update

SECAS presented its changes to the TABASC Terms of Reference (ToR). The TABASC agreed to the proposed changes and recommended the ToR are sent to the SEC Panel for approval.

SMIP No SMWAN Proposal

DESNZ presented its No SMWAN proposal to the TABASC which would allow smart meters to be installed in areas with no SMWAN coverage. The TABASC welcomed this initiative and agreed with the principles of the proposals as set out in the related consultation.

TABASC Effectiveness Review Survey 2023

SECAS returned to TABASC with the results of its 2023 TABASC Effectiveness Review Survey. The TABASC agreed that SECAS conduct further investigations into the issues reported. The TABASC also agreed that SECAS should investigate an update to the formatting and approach of holding the survey on a yearly basis.

TSAT Guidance Note Proposed Scenarios

SECAS presented an update on its progress with the Technical Specifications Applicability Tables (TSAT) Guidance Note and Proposed Scenarios, which the TABASC noted.

3.2 TAG Highlights

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

CH&N Testing Approach Document

The DCC provided the Communications Hubs and Networks (CH&N) Testing Approach Document (TAD) for approval, which had been updated in line with changes to SEC Appendix AQ (SEC Variation Testing Approach Document for the CH&N Arrangements) – the CH&N SEC Variation Testing Approach Document (SVTAD). The TAG reviewed the amendments to the TAD and conditionally approved them, on the condition the SVTAD amendments were designated by the Department for Energy and Net Zero (DESNZ) as planned.

CH&N Testing Approach Document and Device Selection Methodology

The DCC presented the updated CH&N TAD, and provided the TAG with an update on the parsing out of the Device Selection Methodology (DSM). The TAG reviewed the TAD and noted whilst the DSM had not changed it required approval as it was now a separate document. The TAG approved

the CH&N DSM, and conditionally approved the CH&N TAD on the conditions that wording be included detailing the assumption that no changes be made to the TAD following the associated ongoing consultation on the Order Management System (OMS) and Logistics subsystems.

CH&N OMS and Logistics Test Coverage

The DCC provided the updated Test Coverage Document (TCD) for the CH&N programme, which had been uplifted to include testing for the OMS and Logistics. The DCC also provided the Coverage Traceability Documents (CTDs) for the OMS and Logistics components of CH&N Pre-Integration Testing (PIT). The TAG approved the TCD amendments and associated CTDs for OMS and Logistics.

CH&N Pre-Integration Testing Exit Format

The DCC presented its proposed template for the CH&N PIT Exit Report decisions in December 2023, requesting TAG feedback to refine the Report's contents ahead of the first PIT Exit Reports being provided to the TAG in January 2024. The TAG reviewed the proposal and provided feedback on the approach.

CH&N Accepted and Expected Manufacturer Issues

The DCC provided an update on twelve Testing Issues (TIs) where it believed the CH was compliant, and proposed the TIs were the result of suspected or accepted Device issues and as such should not be counted against the CH&N PIT TI threshold.

As part of the TAG's review of the proposed TI exceptions it arose that changes may have been made outside of those strictly necessary for the support for 4G CHs, despite industry having been assured this would not occur. The TAG asked the DCC to provide a full list of changes, both to support 4G CHs and additional changes made, to a number of other Sub-Committees and industry forums.

The TAG agreed to grant exceptions to many of the TIs proposed for exceptions, excluding two TIs which the Sub-Committee was not satisfied met the exception criteria.

June 2024 Testing Approach Document

The DCC presented the June 2024 TAD and industry responses to the June 2024 TAD consultation. The TAG reviewed the TAD and proposed DCC responses to industry feedback, and approved the June 2024 TAD.

TAG Terms of Reference Review

SECAS provided the TAG with version 2.2 of the TAG Terms of Reference (ToR). Due to feedback received the day prior to the meeting from DESNZ which required incorporation, however, SECAS recommended approval of the ToR be deferred until TAG 110 in January 2024. The TAG agreed to defer the decision.

3.3 Operations Group Highlights

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

Spurious Alerts

The principal cause of the unexpected increase in 8F3E alerts has been identified, and the DCC is working with Suppliers to resolve it. This is expected to result in reduction in the alert volumes in the coming quarter.

DSP

The DCC provided the OPSG with an update on Data Service Provider (DSP) System Integrator (SI) Strategic Outline Case (SOC). The OPSG discussed accountability and measurability of effectiveness of the SI and asked that the DCC come back in January to provide an update in response to the feedback provided.

FSM

The OPSG noted the update but did not endorse the proposed business needs during the meeting. The OPSG asked that these needs be adjusted to address the key concerns raised on behalf of Users. The DCC subsequently issued an updated version of the business needs ex-committee which were endorsed by the OPSG.

Scaling and Optimisation

The DCC provided a progress update on Phase 2 and the results from the preferred option, SRW (Scheduled Read Window) trial of the time adjustment. Now that confidence in this mechanism has been established, the next step will be to set out how it will be employed.

1 Jan Price Change Event

The DCC presented a summary of its planning and preparation activities, stating there are no major differences to the approach envisaged from that employed for the October price change event. The DCC will again request cooperation from Users, and the OPSG again emphasised the need for the DCC to ensure the readiness of Service Providers.

OMS

The DCC provided the OPSG with an update on the Order Management System (OMS) and noted there were still comments from Users on the proposed requirements, and the DCC were asked to clarify this. The DCC noted that, in a change, the capability and service being described would now be used for ordering for the IPV phase.

The OPSG noted the proposed service will be heavily reliant on emails between Service Users and the DCC, expressing concern on whether it was sufficiently robust given the significance (financial and operational) of the transactions that it be required to support.

The OPSG did not endorse the business requirements in the meeting for the reasons outlined above however, they have subsequently distributed a reviewed paper with further detail which is currently in the process of seeking endorsement from the OPSG.

TSAT Expired Communications Hubs

The DCC stated that, other than for a small subset of these devices, it would be possible to install, commission and update these devices without undue problems either for individual devices or the service as a whole.

The OPSG highlighted that individual Suppliers were responsible for resolving this matter, in compliance with the SEC, and if necessary, should raise a Modification Proposal.

The OPSG noted that any impacts on the planning assumptions for the 4G rollout needed to be identified.

Ofgem Price Control RY2022/23

SECAS provided an initial draft response for review with the OPSG. SECAS noted any final comments could be raised the SEC Panel and the agreement of the formal Panel response to Ofgem.

Incorrect DNO Certificates

In relation to incorrect DNO certificates, the OPSG agreed that SECAS should contact the Suppliers where error rates were increasing significantly and ask for their plans for remedying this. In relation to the T3 aerial installation process the OPSG agreed that SECAS will return in January with an update considering the OPSG Members feedback.

Terms of Reference (ToR) Review

There were no OPSG comments on the proposed draft, which was endorsed by the OPSG.

SEC Derogations (Planned Maintenance and BDCR)

The OPSG Chair initially raised awareness of a possible derogation for planned maintenance scheduling prompting a discussion of the difficulties experienced with scheduled BDCR events. The OPSG discussed obligations for scheduling Planned Maintenance and BDCR testing. The OPSG agreed to return to this topic in 2024.

Operational Issues

The OPSG agreed more frequent and lengthier regular discussion of operational issues should be accommodated in the Main OPSG Meeting. SECAS were asked to set out how this could be done.

4. Security Sub-Committee and SMKI PMA

4.1 Assurance and Compliance Status Decisions

The SSC set the Assurance Status for two initial Full User Security Assessments (FUSAs), and the Compliance Status for two second or subsequent FUSAs in December 2023. Details can be found in the confidential Appendix A.

4.2 SSC Highlights

The SSC also discussed the following items:

Matters Arising

- The SSC noted an update on the Deloitte Overseas Remote Working (ORW) Policy and approved an overseas remote working application.
- The SSC noted a self-assessment for decommissioning a User System.
- The SSC approved a material change subject to SECAS receiving satisfactory evidence.
- The SSC approved a new User System.
- The SSC noted two recently published NCSC security alerts on security matters.

Anomaly Detection Threshold Guidance

The SSC noted the latest updates on Anomaly Detection Threshold (ADT) Guidance.

Anomaly Detection Attributes (Pre-Payment)

The SSC reviewed DCC proposals to amend Anomaly Detection Attributes (ADAs) and Members agreed to consider the changes further. A further update will be provided in January.

CPA Monitoring

The SSC was presented with an update on withdrawn Certificates, early expiry of Smart Meter Certificates, and Remediation Plan Updates. The SSC agreed SECAS is to issue written confirmation

to SEC Parties stating an SSC minded-to position to mark all relevant L+G and EDM I Devices as removed from the CPL on 29 March 2024.

CPA-Related Issues

The SSC approved an action for the DCC to provide details of the secure process for refurbishing Communications Hubs and agreed the agenda for the SCIRS meeting on 18 December 2023.

CPA Risk Review – WNC Comms Hubs

The SSC noted the outcome of the CPA Risk Review for the WNC Communication Hubs and will review the response from WNC UK Ltd at a future SSC meeting.

Trial Device Application – L&G

The SSC noted the Trial Device Application from L&G and agreed to bring the agenda item back to an SSC Meeting in January after carrying out further investigation and alerting the Panel to potential privacy implications.

Manufacturing Pack – CoS Party Element

The SSC approved the strategy outlined by the DCC for the Change of Supplier (CoS) Party element of the Manufacturing Pack.

DCC Updates

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

- Testing Automation Framework – Security Assurance
- Public Key Infrastructure – Enduring (PKI-E) – Request For Proposal (RFP) Requirements
- Data Service Provider (DSP) Systems Integrator (SI) outline business case.

SSC Incident Management Exercise

The SSC held an Incident Management Exercise on Thursday 14 December 2023. The purpose of the exercise was to consider the SSC's role relating to multiple security incident scenarios, including where the Smart Metering Incident Response Team (SMIRT) is required to convene and follow the Joint Industry Cyber Security Incident Management Plan (JICSIMP).

4.3 SSC CPA Issue Resolution Sub-Group (SCIRS)

At the December 2023 SCIRS meeting the following issues were discussed:

Matters Arising

- **Triage Facility Provider assessments:** SCIRS members were informed that two Triage Facility Providers were approved at the SSC at the meeting on Wednesday 13 December 2023. They are now formally approved to undertake Use Case 004 Triage activities, and Triage Facility Provider Assurance Status Certificates will be published on the [SEC website](#).
- **MP168 (IKI File Signing for CPL entries):** The DCC informed SCIRS that it is performing internal testing. There is an issue with Excel signing which they are looking into, which is related to the validation path.
- **Load Controller Test Certificates:** The DCC informed SCIRS that BT has now provided the certificates, and they are now being tested by Critical Software.

SMKI Certificate Management

The DCC provided SCIRS with updates on Certificate Management relating to Use Case 004 (Factory Reset) and the Manufacturing Pack 2026 Certificate expiration. DCC's next planned update focussing on the DCC OCA certificate management policy.

Use Case 005 (Comms Hub Refurbishment) Update

The SCIRS Chair advised 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'. An SSC Consultant is undertaking the drafting on behalf of SSC but is awaiting input from the DCC on the existing process.

CPA Risk Review Update

The SCIRS Chair provided an overview on all Comms Hubs subject to Risk Review and SCIRS members noted the update.

Future CPA Scheme – Update

The SCIRS Chair informed SCIRS that there has been no change to the plan since the previous SCIRS meeting in November and outlined the expected timetable.

4.4 SMKI PMA

Matters Arising

- SMKI PMA noted that the SSC has raised [DP259 'Triage System Interface Definition'](#).
- SMKI PMA noted that NCSC has released updated guidance on FIPS 186-5.
- SMKI PMA noted that on 12 December 2023, Ofgem announced the revocation of a gas supply licence for ESB Energy and directed the DCC to revoke the SMKI Certificates as per SEC Appendix B 4.9.1 (B)(ii).

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 SMKI PMA was presented with a progress update on the Test Exercise to Correct Incorrect SMKI Certificates. The SMKI PMA noted that the Recovery Exercise has now finished and was successful in replacing 1.684 million incorrect Network Operator Certificates with Access Control Broker Certificates.

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.

tScheme Certification

The DCC presented the SMKI PMA with an update on tScheme certification, and the SMKI PMA noted the update and set the compliance status to 'approved' and agreed to notify SEC Parties as required by SEC Appendix AO section 4.4.

PKI-E RFP Requirements and Proposed Regulatory Change

The DCC presented the SMKI PMA with an update on the PKI-E Requirements and the proposed scope of potential regulatory changes needed.

5. SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) met on 11 January 2024 for an Extraordinary meeting to discuss potential Hybrid SMDA testing approaches which could be considered as part of the SMDA review.

During this meeting, the SMDASC reviewed three proposed options on how devices could be offered assurance in the future, utilising Manufacturers own in-house testing facilities. These options would be an addition to the conventional 'as is' route to SMDA assurance.

- Option 1: Device Manufacturers follow SMDA test scripts and use their own test facilities to provide testing evidence to the SMDA Scheme.
- Option 2: Device Manufacturer tests using SMDA Test House test facilities and SMDA test scripts.
- Option 3: Device Manufacturer submits evidence of own testing without following standardised SMDA test scripts.

The SMDASC recommended that Option 1 and 2 required further review, with information needing to be collected from Manufacturers on their current testing architecture so that any differences between SMDA testing requirements and those undertaken by the Manufacturer can be understood. The SMDASC also agreed not to process with option 3. This information, once collected, will be used as part of the SMDA Review Consultation which will be reviewed by the SMDASC at their next meeting on 13 February 2024.

Along with this item, the SMDASC will also discuss the testing of 4G Communication Hubs via the SMDA lab, future support for Hydrogen/ Hybrid Device testing and a proposal to review testing arrangements for Dual Band Devices.

6. Recommendations

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

Rebecca Sawyer
SECAS Team
16 January 2024

Attachments:

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