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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:

At CTG 14, the CTG agreed to highlight to the SEC Panel the ongoing development of a DCC Nominated Contact List, noting the CTG has previously discussed issues with effective DCC communications. The CTG agreed to close Action 12/02 and noted a Nominated Contact List is broader than CTG as is DCC's broader communication contacts and is more appropriate for the SEC Panel to monitor this activity.

2. Communications Transition Group (CTG)

The CTG has met once since the previous Panel meeting, for CTG's fourteenth meeting.

DCC Update: 4G CH&N Programme

Programme Update

DCC presented an overview of the overall plan for CH&N Transition to 4G Communication Hubs (CHs) and provided updates on its programme risks and issues noting that all areas have a RAG status of Green. DCC advised that Systems Integration Testing (SIT) was progressing well; a defect is currently under review with no impact expected on the overall plan.

User Integration Testing Update

DCC presented an update on User Integration Testing (UIT) and highlighted the Joint Industry Plan milestone of 1 April 2024 for DCC to commence the Test Comms Hubs ordering process, noting DCC had started receiving orders from Suppliers. DCC acknowledged the request from test participants for DCC to build in a testing window in UIT-A, and DCC advised they were investigating two possible options including a gateway solution and offering a UIT-A testing window before Initial Pallet Validation go-live. The DCC acknowledged CTG's feedback to be considered as part of the discussions at the Testing Advisory Group (TAG). The DCC confirmed they were presenting the proposed options to the TAG in April, and the TAG Chair agreed to provide an update to CTG in May. The CTG Chair noted

TAG's responsibility from a governance perspective and CTG's tracking the overall risk around UIT participation.

Initial Pallet Validation Approach Document (IPVAD) Update

DCC presented an update on the Initial Pallet Validation Document Approach (IPVAD) and noted the IPV phase of CH&N will run from 2 December 2024 to 3 February 2025. The DCC noted the intention to establish an IPV Working Group to support the IPV phase and proposed to present the IPVAD to CTG for review prior to the next CTG meeting in May.

DCC advised the IPVAD presented the reporting and governance mechanisms and entry and exit criteria for IPV and sought CTG's agreement to present CTG as the nominated Sub-Committee for the IPVAD to the SEC Panel for approval.

The CTG agreed with the proposal for CTG to be the nominated Sub-Committee for the IPVAD review, subject to SEC Panel approval.

Regulations Update – Phase 2 Consultation

DCC presented an update on the Phase 2 Consultation on transitional and enduring regulatory changes, and noted it is on track to be published by mid-April. DCC noted an intention to facilitate a consultation Webinar the week commencing 29 April 2024, to provide an overview of the changes.

DCC advised the [CH&N Conclusions on SEC Changes for 4G CH Forecasting, Ordering & Delivery Service](#) was published on 5 April 2024.

Intimate Communications Hub Interface Specification (ICHIS) Progress Update

DCC presented an update on *Intimate Communications Hub Interface Specification (ICHIS)* testing for the existing meter estate, and noted testing was progressing well with 9/13 models successfully completed without WAN/HAN issues identified. DCC noted two models are under investigation due to inconsistent results and there is a two-week delay to planned testing due to sample availability. DCC advised the JIP Milestones to complete testing by June 2024 and conclude engagement on RF Noise by September 2024 are on track.

4G Comms Hub Financing Update

DCC presented an update on 4G Transitional Financing Arrangements and confirmed discussions were progressing with VM02 and Banking Partners to ensure there are no funding issues impacting the supply of 2G/3G meters up to the mass roll out of 4G CHs in 2025.

2/3G to 4G CH Ordering Transition Update

DCC presented an update on the 2/3G Supply Chain Position and noted orders and forecasts supported the rollout of Smart Meters with 2/3G CHs until August 2025, with the assumption stock would be exhausted by end of August. DCC advised they are working directly with Suppliers to complete supply chain health checks, however, DCC requested Suppliers who have not yet shared non-committed forecasts with DCC, to do so by the end of April 2024. DCC highlighted they were engaging with VMO2 to mitigate any risks presented by potential delays in UIT or IPV.

The CTG noted the updates.

DCC Update: SMETS 1 End of Life

DCC presented an update on SMETS1 End of Life (EoL) and presented the outcomes from the first SMETS1 EoL Workshop held on 20 March 2024. DCC noted the second SMETS1 EoL Workshop would likely be held in May, however this was contingent on the Request for Information (RFI) being issued and response times.

SECAS presented an update on the RFI process and noted a draft RFI was issued to CTG Members for comment on 4 April 2024, and requested CTG Members provide any comments on the draft by 10 April 2024 to allow the RFI to be issued the same day. SECAS noted the deadline for RFI responses

would be 24 April 2024 and SECAS would facilitate the ability for Suppliers to submit responses via a secure portal.

SECAS agreed to exclude MAPS from the RFI as CTG confirmed the questions applied to Suppliers only and agreed to amend draft Question 3 to reflect that members can also use a single figure/period for Premature Replacement Charges.

Actions Log Update

The CTG noted the actions log update and agreed to close all actions marked as Propose to Close, including action CTG 12/02 whereby the CTG agreed the development of a DCC Nominated Contact List is broader than the CTG as it affects Sub-Committees and the SEC Panel.

DESNZ Consultation ‘Further Engagement on Cost Recovery Arrangements and Legal Changes.’

SECAS presented an update on the DESNZ Consultation ‘Further Engagement on Cost Recovery Arrangements and Legal Changes,’ and noted DESNZ are requesting consultation on its minded position to recover costs via DCC Fixed Charges on a GB-wide basis. SECAS sought confirmation that CTG Members agreed individual SEC Parties were best placed to respond independently to the consultation, noting the nature of the questions, and that no CTG response was required. The CTG agreed no CTG response to the consultation is required.

Sub-Committee Chair Updates

The TAG, OPSG, TABASC and SSC-SMKI Chairs advised there were no further Sub-Committee updates relevant to the 4G programme beyond those discussed under the UIT update. The CTG noted the update.

CTG Overall Transition Plan (OTP) Update

The Chair presented changes to the CTG Overall Transition Plan (OTP) and advised changes incorporated outcomes from the two Energy Suppliers focussed readiness sessions and the latest JIP milestones, as well as input from DCC, DESNZ and Ofgem. Engage noted an updated Plan on a Page would be presented to CTG in May following the baselining of the OTP.

The CTG agreed to baseline the Draft OTP as version 1.7.

CTG Risks and Issues Register – monthly update

The CTG noted changes made to the Risks and Issues Register and agreed to the changes and baselining of the draft as v13.0.

CTG Terms of Reference

SECAS presented the updated Terms of Reference (ToR), following a review of the ToR to include SMETS1 End of Life within the scope of CTG and other general updates. The CTG noted the CTG’s role will need to be considered in future with respect to DCC’s Future Connectivity Strategy and that this is expected to be considered by SEC Panel in due course. The CTG endorsed Version 1.1 of the ToR to be submitted to the SEC Panel for approval at the next SEC Panel meeting.

Asset Life Project Final Findings Paper

SECAS presented the Asset Life Brief Final findings for the modelled scenarios and noted the options that are likely to provide the most benefit in reducing the expected incurrence of Premature Replacement Charges (PRC).

The CTG noted the findings presented and agreed to close the Asset Life project.

3. Technical Operations

3.1 TABASC 100 meeting

The TABASC 100 meeting is scheduled for 18 April. The topics to be discussed are:

The DCC will bring DSP Migration for discussion. The DCC is asking the TABASC to review and comment on the supporting materials provided to ensure customer knowledge and experience is contained within the Lot 1 Invitation To Tender (ITT).

The DCC will bring an overview of the new Future Service Management (FSM) Working Group. This is for information, to provide the process and topic schedule for the SMWG and how it will report back into governance.

The DCC will present its CH&N Live Service Criteria evidence for decision. The DCC are seeking endorsement of its evidence approach.

The DCC will present an update on its DCO Re-procurement for information. The aim is for TABASC to provide any feedback on the DCC's revised approach and impacts to DCC Users.

The DCC will bring CSP.N S&O Higher Modulation Rate (4FSK) feature consultation for information. The DCC are providing an overview of the potential benefits of Higher Modulation (4FSK) on the long-range radio network and to signpost the consultation they will be running.

The DCC will bring a BCDR Testing Plan Approach Overview for decision. The ask is to close a TABASC action centred around the assurance of the Business Continuity Disaster Recovery (BCDR) testing environment.

The DCC will bring an overview of its Future Connectivity Strategy and tech connectivity options for discussion. The DCC are requesting TABASC input on key technology choices, notably: public v proprietary technology preference; decision criteria for down selecting at Outline Business Case (OBC); and any other key architectural/technology considerations.

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 Hubs and Networks

The DCC presented a number of updates on the Communications Hubs and Networks (CH&N) programme. These includes updates for the Plan on a Page (POAP), the Live Services Criteria (LSC), amendments to the Testing Approach Document (TAD), the Initial Pallet Manufacture (IPM) TAD, amendments to the CH&N Test Coverage Document (TCD) and Systems Integration Testing (SIT) Coverage Traceability Document (CTD), and a proposal for available User testing routes.

The TAG approved the changes to the test artefacts and approved the IPM TAD and endorsed the proposed routes for CH&N User testing.

SMETS1 XML Signing Approach to Testing

The DCC provided the approach to testing for Smart Metering Equipment Technical Specification 1 (SMETS1) Extensible Markup Language (XML) digital key signing. The TAG reviewed the approach to testing and approved it.

November 2024 SEC Release TAD

The DCC provided an overview of the November 2024 SEC Release TAD for review. The TAG reviewed the overview and noted the update.

ECoS PKT Approach to Testing

The DCC provided an update on the approach to testing for Enduring Change of Supplier (ECoS) Private Key Transfer (PKT), which the TAG noted.

Test Automation Framework TAD

The DCC presented an overview of the Test Automation Framework (TAF) TAD, which the TAG noted.

Use of Artificial Intelligence in Testing

SECAS provided the TAG with a draft risk for consideration surrounding the use of Artificial Intelligence (AI) in testing. The TAG reviewed the draft and provided feedback.

TCoS Decommissioning Approach to Testing

The DCC provided the TAG with the approach to testing for decommissioning of the Transitional Change of Supplier (TCoS) service, and the TAG approved the approach to testing.

3.3 Operations Group Highlights

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

OPSG Issues

SECAS presented two high priority issues for OPSG to review and discuss next steps: Communications Hubs (CHs) in Communications Service Provider North (CSPN) losing communications; and CH Birthing issues in CSPN. The DCC stated that it continues to investigate the root cause for both issues and it has scheduled a meeting with CSPN and impacted Users to discuss measures on how to rectify CSPN's general handling of issues. The DCC agreed to provide update on reasons for non-communicating CH next month and discuss ways forward.

Major Incidents

The DCC presented two Major Incidents, one Category 2 and one Category 1 that occurred in March 2024. The DCC reported Incidents as DSP and change related. The DCC reported a slight increase in lower-level Incidents and noted that this was due to Users raising more single premise Incidents.

Communications Hubs and Networks (CH&N)

The DCC presented the CH&N Live Service Criteria (LSC) document along with Initial Pallet Validation (IPV) planned response and evidence. The DCC reported that the IPV readiness was being monitored at the Communications Transition Group (CTG) on a monthly basis for progress and shaping of the process.

Data Service Provider (DSP)

The DCC presented on the DSP engagement and migration. The OPSG asked where the FSM solution transition from former DSP to current DSP was being considered and requested that it be included within DSP migration.

April Price Change Event

The DCC reported that the April price change event produced an almost identical outcomes in terms success rate to that of January 2024, with a 96% success rate.

Dual Control Organisation (DCO)

The DCC presented an update and overview of the revised DCO programme, noting that the recent feedback from Ofgem encouraged acceleration of the re-procurement process. The DCC requested feedback from the OPSG by 19 April 2024.

Future Service Management (FSM)

The DCC presented an update on FSM and the current plan to implement in October 2025 as a replacement of current service management system, due to run to 2030. The DCC presented the creation of the Service Management Working Group (SMWG) and the responsibilities of that group. The OPSG enquired about the published minutes and outcomes of the group and requested that the OPSG is given sight of these.

Future Connectivity Strategy

The DCC presented the requirement for a Future Connectivity Strategy due to the challenges within CSPN, the sunsetting of cellular technologies and managing multiple SMETS1 and SMETS2 contracts over time. The OPSG enquired about the benefits analysis and asked for a view of the high-level costs, the OPSG also requested that the DCC provide a high-level description of the new future connectivity technologies.

MP252 – ‘Amending the Process for Communications Hub Returns’

SECAS presented on the update on the Modification MP252 ‘Amending the Process for Communications Hub Returns’. The OPSG queried the charging methodology within the proposed solution, noting that there is currently a gap within the SEC around charging for returned CHs.

4. Security Sub-Committee and SMKI PMA

4.1 Assurance and Compliance Status Decisions

The SSC set the compliance status for two initial Full User Security Assessment (iFUSAs), two Full User Security Assessments (FUSAs), one Follow-Up Security Assessment (FUA), and one Security Self-Assessment (SSA) in March 2024. Details can be found in the confidential Appendix A.

4.2 Remediation Plans and Director’s Letters

The SSC reviewed two FUSA Remediation Plans and Director’s Letters, three Verification User Security Assessment (VUSA) Remediation Plans and Director’s Letters and one SSA Director’s Letter in March 2024.

4.3 SSC Highlights

DCC CIO Assessments

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

DCC CIO Forward Look

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

CPA Monitoring

The SSC Chair presented the SSC with an update on withdrawn Certificates and the expiry of Commercial Product Assurance (CPA) Certificates, as well as an update on Communication Hubs and the latest Pre-Payment Report.

SECP_127_2304 – SEC Panel Sub-Committee Report

CPA-Related Issues

The SSC Chair presented the SSC an update on CPA-related issues including risk reviews, tamper alerts, triage matters, outcomes from the last SCIRS Meeting, and an update on the CPA Future Scheme and the SSC provided feedback.

G5.22/ ADTs

The SSC Chair presented an update on G5.22 and Anomaly Detection Threshold (ADT) settings and the SSC provided feedback.

CH&N LSC - Product Deployment

The DCC presented the SSC with the Live Service Criteria timeline and approach to Product Deployment and the SSC provided feedback.

Separation of Duties

The SSC Chair presented the SSC with an update on Separation of Duties for Supply Sensitive Checks and Anomaly Detection Thresholds and the SSC provided feedback.

Tamper Protection

The SSC Chair presented the SSC with an update on a proposal relating to tamper protection on Devices and the SSC provided feedback.

Response to DESNZ Consultation on CPA

The SSC Chair presented the SSC with an update on the response to the DESNZ consultation on the Future CPA Scheme and received SSC feedback.

TAF Update

The DCC presented the SSC with an update on Testing Automation Framework (TAF) and the SSC provided feedback.

SMETS1 IP Pool

The DCC presented the SSC with an update on the SMETS1 IP Pool increase and the SSC provided feedback.

SMBILS Review

The SSC approved updates to the Smart Metering Business Impact Levels (SMBILs) which will feed into the 10th Iteration Risk Assessment.

Meter Firmware Escrow

The SSC Chair introduced a proposal from a MAP regarding the management of Meter Firmware by utilising escrow, and the SSC provided feedback.

Incident Management Exercise

The SSC Chair presented the SSC with an update on a proposal to align the SSC and SMKI PMA and pre-prepared UTRNs and the SSC provided feedback.

PKI-E RFP Update

The DCC presented an update on the Request For Proposals for the Public Key Infrastructure Enduring (PKI-E) Programme and the SSC provided feedback.

TCoS Key Destruction

The DCC presented an update on Transitional Change of Supplier (TCoS) key decommissioning as part of the Enduring Change of Supplier (ECoS) Programme and the SSC provided feedback.

Security Risk Assessment Proof of Concept

SSC Consultants presented an update on the plan and proof of concept for the Security Risk Assessment 10th Iteration and the SSC provided feedback.

MP269 'Certificate Rotation and Expired Certificates'

SECAS presented the SSC with an update on MP269 and the SSC provided feedback.

DCC Updates

The SSC noted the following standing updates and reports provided by the DCC for security assurance monitoring:

- Post Commissioning Report
- Anomaly Detection Report
- CH&N CIO Assurance Report

4.4 SSC CPA Issue Resolution Sub-Group (SCIRS)

At the March 2024 SCIRS meeting the following issues were discussed.

MP168 (IKI File Signing for CPL entries)

The DCC noted that feedback on the use of IKI file signing had been received since the last SCIRS meeting and agreed to update the guidance as a result.

Triage Facility Provider Assessments

SSC is due to shortly review the third User Security Assessment of a Triage Facility Provider. The User CIO is undertaking a 'lessons learned' exercise which may lead to updates of the Triage Security Controls Framework (TSCF).

DP267 (Facilitating the installation and commissioning of meters triaged under Use Case 004)

The SCIRS Chair noted that Manufacturers had given feedback on whether it is feasible to maintain original Device Private Keys and DCC ACB Certificates. Following discussion with SCIRS members it was agreed that this question will be asked again due to design changes over the last few months.

Device CSR Criticality Flag

The SCIRS Chair provided an update on SMKI Certificate Signing Requests (CSRs) criticality flags, noting that in future Device CSRs set to "False" which is non-compliant with the SEC and may be rejected by the DCC. SCIRS members noted that the SMKI PMA has asked for a DCC report of Device CSRs that have been submitted with the incorrect "False" field.

Future CPA Scheme

The SCIRS Chair provided an update on the future CPA Scheme on which DESNZ will consult. A timetable will be set out at the a future SCIRS meeting.

CPA Risk Review Update

SCIRS Members noted that a workshop with SSC, NCSC and Test Labs to discuss concerns and lessons learned from the process could now be convened, following a call between Test Lab, DESNZ and the SCIRS Chair on 15 March.

4.5 SMKI PMA

SoLR Update

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

SMKI Organisation Certificate Revocation

The SMKI PMA noted an update on SMKI Organisation Certificates that have been revoked either as a result of a Party withdrawing from the SEC or being expelled from the SEC by the SEC Panel

Test Exercise to Correct Incorrect Network Operator Certificates Lessons Learned

The SMKI PMA noted an update on lessons learned from the test exercise to correct incorrect network operator Certificates.

CSR Criticality Flag

The DCC presented an update on a CSR criticality flags, which the SMKI PMA noted and agreed to request a report from the DCC to understand the issue in more detail.

TCoS Key Destruction in DSP

The SMKI PMA was presented with an update on the destruction of Transitional Change of Supplier (TCoS) Keys.

Quantum Computing Report

The SMKI PMA was presented with the final report from the Quantum Computing project.

Programme Assurance Policy

The SMKI PMA noted an update from SECAS on the Programme Assurance Policy.

SPOTI Requirement

The DCC presented the SMKI PMA with an update on the SMKI Portal Over Internet (SPOTI) providing volumes of usage (not used since 2022).

SMKI PMA and SSC Guidance (Standards)

The SMKI PMA approved updates to the SMKI PMA and SSC Guidance subject to SSC consideration of any security concerns.

DP268 'Certificate rotation and expired Certificates'

SECAS presented the SMKI PMA with an update on [MP268 'Certificate rotation and expired Certificates'](#). The SMKI PMA noted the update and provided feedback.

4.6 Privacy Sub Committee

The first Privacy Sub Committee (PSC) was held on 21 March 2024. PSC Members introduced themselves and noted their expectations for the Sub Committee. PSC Members reflected on the inaugural meeting and discussed ideas for future meetings.

Terms of Reference

The PSC reviewed the PSC Terms of Reference (ToR) and agreed that it adequately represented the duties, authority and responsibilities of the new PSC and that no amendments were required for Panel approval.

The PSC's Role in Section I and Privacy Assessments

The User IPA presented an overview of the PSC's role in Section I and the Privacy Assessments.

The SECAS Privacy Experts Role in Privacy Assessment Validation

The SECAS Privacy Experts presented an overview of their role supporting assurance activities as

defined under Section I of the SEC.

PSC Statement Objectives

The PSC Chair introduced the PSC's Statement of Objectives and the PSC noted that this would be discussed in detail at the next meeting.

5. SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) meeting was held on 9 April 2024. At the meeting, members discussed the following items.

SMDA Review and Double Band Device Testing – Consultation Response

SECAS presented the consultation responses for the SMDA Review and implementation of Double Band Device Testing. On the SMDA Review, respondents indicated that there were some reservations regarding whether the high-level requirements for the scheme will improve service. Respondents further noted that the Hybrid testing approach is not desirable and that they generally agreed with the procurement approach proposed.

GBCS 4.1 Communication Hubs Update

The SMDASC discussed the progress of testing undertaken on GBCS v4.1 Communication Hubs (CH) and the SMDA Scheme Operator (SO) presented a list of confirmed GBCS 4.1 CH firmware that had completed testing and that no issues were found in doing so. The SO further noted that the CHs have been pre-ordered in anticipation of adding these to the SMDA Testing baseline.

6. Recommendations

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

Rebecca Sawyer
SECAS Team
16 April 2024

Attachments:

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