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Action:	For Discussion

MP134B DCC Second Preliminary Assessment

1. Purpose

[MP134B 'Use of SMKI Certificates relating to a SoLR event Part 2'](#) is currently undergoing the Refinement Process. The Data Communications Company (DCC) has completed its second Preliminary Assessment. We seek the Technical Architecture and Business Architecture Sub-Committee (TABASC) input on the following questions before this is presented at Change Board for Impact Assessment request:

- Does the DCC's solution deliver the business requirement?
- Is the developed solution cost-effective?

This paper provides a high-level summary of the key points. The DCC Preliminary Assessment can be found in Appendix A and the business requirements in Appendix B.

2. Summary of the Modification Proposal

What is the issue?

The Supplier of Last Resort (SoLR) process was developed by Ofgem to manage the exit of failed Suppliers from the market where no trade sale or commercial agreement is possible. Once Ofgem revokes the supply Licence of a failing Supplier, the DCC are required to revoke the Smart Metering Key Infrastructure (SMKI) Certificates. Whilst SoLRs to date have involved Suppliers exiting the market in an 'orderly' way, there is a concern that a Supplier falling out of the market in a 'disorderly manner' could expose prepayment consumers to the risk of supply continuity. In 4 October 2021 [MP134A Use of SMKI Certificates relating-to-a-SoLR-event](#) was implemented as an immediate but short term measure to allow the Smart Metering Key Infrastructure (SMKI PMA) to allow the delay of the revocation of the failed Suppliers SMKI Certificates. This has worked adequately since implementation but there is a concern that this does not fit with the Security Trust Model. In addition, it adds a burden to the Chair of the SMKI PMA to check emails late at night and on weekends.

What is the Proposed Solution?

The Proposed Solution is to build a new User Role currently titled 'SoLR Contingency'. This will be created for Shared Resource Providers (SRPs) to send Commands to Devices in the event of a Supplier failure (a SoLR situation). The new User Role would identify the SRP acting in this capacity and limit its capabilities in that capacity to allow messages that would ensure prepayment consumers

are put into a mode where they would not lose supply during the transition process. Whereas the previous Preliminary Assessment changed the behaviour of Service Request (SR) 1.6, the Working Group directed that this new Preliminary Assessment should be based on modifying the use of SR 2.1 'Update Prepay Configuration'.

3. Why a second Preliminary Assessment is required

The first Preliminary Assessment was performed against Service Request (SR) 1.6 'Update Payment Mode' and was quoted at £632,500 to £1,082,500 up to and including Pre-integration Testing (PIT). SECAS then issued the modification for a Refinement Consultation. The feedback from the Refinement Consultation and the Working Group were:

- The Solution has high DCC Costs
- The Solution would require Shared Resource Providers (SRPs) to make significant changes to their business infrastructure which would be costly and be passed on to Suppliers and subsequently consumers
- Only one Supplier has undergone a disorderly exit in the last 18 months
- The one Supplier in question did not have any Prepayment Customers
- Several respondents considered that the solution was unlikely to be used
- Suppliers were concerned that SR 1.6 would confuse consumers and would prefer to have a non-disablement calendar instead.

SECAS reviewed the Business Requirements. Since the main solution was developed by SECAS, BEIS and DCC a workshop was held with SECAS, BEIS, DCC and DSP to investigate alternative options. The conclusion was that only the SRV type was flexible, the remaining parts of the Solution were optimal and therefore required. SECAS therefore requested that DCC provide a second Preliminary Assessment on the Suppliers preferred the use of Service Request 2.1 'Update Prepay Configuration'.

4. Business requirements

The below are the list of the second business requirements based on the second DCC Preliminary Assessment for MP134B: -

1. A new User Role is created with roles as defined in Appendix AD 'DCC User Interface Specification' (DUIS)
2. Smart Energy Code (SEC) Parties acting in that User Role can subscribe for Extensible Markup Language (XML) Signing Certificates, but not Digital Signing Keys for signing Critical Commands
3. The new User Role will only be able to send Service Request 2.1 'Update Prepay Configuration'. The solution should be configurable to enable other Service Request to be added to the list of SRVs that this User Role is eligible to use.
4. Parties acting in this User Role must be able to create Authorised Responsible Officers (AROs) and Senior Responsible Officers (SROs) to enable submission of Anomaly

Detection Threshold (ADT) files that will allow the new User Role to send Service Requests to Devices registered to a specific Supplier

5. The content of the Service Request (for SMETS1 Devices) and Signed Pre-Command (for SMETS2+ Devices) must be checked to only accept only messages with an update to the non-disconnect calendar
6. The default position will be that Users in this User Role will only be able to send the Service Requests listed in requirement 3 and will only be able to do so in the event of a Supplier failure and upon specific instruction from the Authority. Additional validation is set out in this requirement.
7. The DCC should remain able to send Alerts to the Supplier after the Supplier's Certificates have been revoked (noting that they will be routed to the failed Supplier's SRP).

5. DCC Preliminary Assessment

The DCC has now completed its Second Preliminary Assessment of the Proposed Solution. There is an increase of approximately seven percent since the first DCC Preliminary Assessment where the solution looked at using SR 1.6 'Update Payment Mode'.

Its response to the First DCC Preliminary Assessment can be found in Appendix C and a copy of the First business requirement can be found in Appendix D. Its response to the Second DCC Preliminary Assessment can be found in Appendix A and a copy of the agreed Second business requirements can be found in Appendix B.

DCC implementation costs

The DCC has provided the following cost estimates in the Preliminary Assessment:

Breakdown of DCC costs		
	Cost up to Pre-Integration Testing (PIT)	Cost for a full Impact Assessment
First DCC Preliminary Assessment	£632,500 to £1,082,500	£28,020
Second DCC Preliminary Assessment	£650,500 to £1,161,000	£39,035

6. Implementation approach

This change is currently targeted for the June 2023 SEC Release (6 June 2023). Design, Build, and Pre-Integration Testing (PIT) is expected to take about three to six months to complete. Details of the implementation will be finalised in the Full Impact Assessment although the implementation is likely to slip to 2024.

7. DSP Re-procurement

The Chair of the SMKI-PMA has written to the DCC to ask that this change be considered in DSP re-procurement. SECAS has spoken with the DCC who have advised that in order for this to be considered it would need to complete the Full Impact Assessment. The authorisation to request the Full Impact Assessment will be requested at the Change Board meeting on the 24 August 2022.

8. TABASC input on the Preliminary Assessment response

We seek the TABASC's views on the following questions to feed into the Modification Report before we proceed to Change Board for a DCC Impact Assessment request:

- Does the DCC's solution in the second Preliminary Assessment deliver the business requirements?
- Is the developed solution cost-effective as a part of a SEC Release?
- Will the solution have a negative impact on the technical and/or business architecture?

9. Next steps

The SSC and SMKI-PMA will also review the second DCC Preliminary Assessment for feedback. We will then seek the Change Board's approval of the Impact Assessment costs. We will subsequently request a DCC Impact Assessment if the costs are approved.

Timetable	
Event/Action	Date
Present to TABASC	4 Aug 2022
Present to SMKI-PMA	10 Aug 2022
Present to SSC	10 Aug 2022
Impact Assessment costs approved by Change Board	24 Aug 2022
Impact Assessment requested	24 Aug 2022

10. Recommendations

The TABASC is requested to **PROVIDE** views and comments on the questions set out in this paper.

Khaleda Hussain

SECAS Team

28 July 2022

Attachment

- **Appendix A:** MP134B Second DCC Preliminary Assessment v0.5
- **Appendix B:** MP134B Second Business requirements v0.2

- **Appendix C:** First DCC Preliminary Assessment v0.3
- **Appendix D:** First Business requirements v0.1
- **Appendix E:** Refinement Consultation responses