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MP214

‘Clarification of Acceptable DCC User IDs for Import and Export Suppliers’

Modification Report

Version 0.4

25 January 2023



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Roxy Ali from the Data Communications Company (DCC).

As per the drafting of SEC Section H 1.5 'DCC Services', SEC Parties are excluded from using the same DCC User Identification (ID) for the User Roles 'Import Supplier' (IS) and 'Export Supplier' (ES) unless they are also a 'Gas Supplier' (GS). This modification seeks to clarify what exceptions to this rule of using one ID number per User Role should be allowed within the SEC.

Parties are impacted by this as they must request more than one ID number from the SEC Panel, which has minor but unnecessary impacts. Similarly, the DCC must also engage in checks to ensure the correct ID has been assigned.

2. Issue

What are the current arrangements?

When a SEC Party wishes to become a DCC User it is required to use a unique ID number, applied by the SEC Panel, for each User Role it wishes to act in. This is to ensure that all messages sent via the DCC System are attributable to the originating Party and to the context in which they are being sent. Exceptions to the rule of using one ID number for each User Role are allowed within the SEC.

Specifically, SEC Section H1.5 states that when a Party wishes to register as a DCC User in the User Roles 'Import Supplier', 'Export Supplier' and 'Gas Supplier', it can use the same ID number for each Role:

H1.5 "A Party wishing to act as a User in one or more User Roles shall propose to the DCC one or more identification numbers, issued to it by the Panel, to be used by that Party when acting in each such User Role. Each such identification number must be EUI-64 Compliant, and the same identification number cannot be used for more than one User Role, save that a Party may use the same identification number when acting in the combined User Roles of either, 'Import Supplier' and 'Gas Supplier' or 'Import Supplier', 'Export Supplier' and 'Gas Supplier'."

What is the issue?

This wording in SEC Section H1.5 excludes a Party from using the same ID number for both the 'Import Supplier' and 'Export Supplier' User Roles unless it also intends to act in the 'Gas Supplier' User Role. Not allowing the use of the same User ID for the Import and Export Supplier User Roles means Parties must request multiple ID numbers from the SEC Panel. The Proposer notes that the DCC frequently receive requests to use the same User ID for multiple roles.

What is the impact this is having?

The Proposer believes that the SEC is unnecessarily exclusionary on this point. There are minor but unnecessary operational impacts on those Parties who must request multiple ID numbers from the SEC Panel. The DCC must also engage in further checks and monitoring to ensure these ID numbers

are assigned correctly. Managing multiple ID numbers for the same Party has a minor impact on DCC time and effort.

Impact on consumers

This issue does not currently have any impact on consumers.

3. Proposed Solution

The Proposed solution involves changes to SEC Section H 1.5 'DCC Services'. The changes would allow Users to have the same identification number for any combination of some or all of the User Roles 'Import Supplier', 'Export Supplier' or 'Gas Supplier'.

The full amendments to the SEC are available in Annex A.

4. Assessment of the proposal

Areas for assessment

Sub-Committee input

SECAS engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums.

The Chairs of the OPSG, SSC and SMKI PMA confirmed no input is needed from these sub-committees.

The Chair of the TABASC expressed an interest in this modification, in particular the number of Users who are using the combined Supplier User role actively. SECAS are working with the DCC to collate these figures and will present this information at the March meeting of the TABASC.

Observations on the issue

At the August 2022 Change Sub-Committee (CSC) a member noted that significant discussions have previously been held on the process by which SEC Parties obtain User IDs. If changes to this process are within the scope of this modification, then there will be DCC System impacts. The Proposer believes DCC System changes are not necessary as part of this modification as they are simply seeking to clarify in the SEC wording something that is already possible in practice.

SECAS presented this modification to the September 2022 CSC meeting where a member noted the original provisions were written during the initial User Entry Process Testing (UEPT) for Parties to become DCC users and a series of assumptions were made on Party activities and their specific roles. These assumptions were never ratified, and it has become clear that there is a more diverse set up to Party roles which needs to be reflected in the SEC.

At the September Requirements Workshop there was disagreement regarding whether the DCC would be able to implement this change without changing the DSP data system. After investigation, SECAS and the DCC confirmed that this modification can take place without fundamental changes to the DSP data system as some Parties that are Import and Export Suppliers are set up as combined Suppliers (IS, ES and GS).

Discussions between the DCC, SECAS and the Chair of the TABASC in January 2023 discovered that some Parties have been registered in the combined Supplier role, even though they are only the Import and/or Export Supplier for that premises. This means that these Import and/or Export Suppliers could also send commands to Gas Smart Metering Equipment (GSME), of which they are not the Supplier. However, this would be rejected at the meter and no information would be returned to the incorrect Party. The Chair of the TABASC questioned whether the current combined Supplier role is still needed, was there a problem with Suppliers using a separate ID for each User Role, and whether this could be altered. SECAS and the DCC agreed to establish the number of Users in the combined Supplier role, and those who are active to get a more precise image of whether a change is needed. SECAS will also seek feedback from the Working Group and a Refinement Consultation on how this change might affect Suppliers' business processes.

Appendix 1: Progression timetable

This Draft Proposal will be presented to the Working Group on 1 February 2023 to gain feedback from Parties regarding the User Roles they are currently using and how this change may impact them. When SECAS has been provided with the data from the DCC about the number of Users who are actively using both roles in the combined Supplier role, this will be presented to the TABASC for discussion. A Refinement Consultation will then be issued to gain further views on the modification.

Timetable	
Event/Action	Date
<i>Modification discussed with the Working Group</i>	<i>1 Feb 2023</i>
<i>Modification discussed with the TABASC</i>	<i>2 Mar 2023</i>
<i>Refinement Consultation</i>	<i>6 Mar – 27 Mar 2023</i>
<i>Review Refinement Consultation responses with Working Group</i>	<i>5 Apr 2023</i>
<i>Modification discussed at Change Sub-Committee</i>	<i>18 Apr 2023</i>
<i>Modification Report Consultation</i>	<i>21 Apr 2023 – 12 May 2023</i>
<i>Vote at Change Board</i>	<i>24 May 2023</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
DCC	Data Communications Company
ES	Export Supplier
GS	Gas Supplier
GSME	Gas Smart Metering Equipment
ID	Identification
IS	Import Supplier
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
UEPT	User Entry Process Testing