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Stage 04: Modification Report Consultation Responses

SECMP0009 'Centralised Firmware Library'

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

About this document

This document contains the collated responses to the SECMP0009 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Nikki Olomo on 020 7081 3095 or email SEC.Change@gemserv.com.

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Consultation
Response Form

6th September 2018

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0009.

The Change Board will consider these responses at its meeting on 21st November 2018, where it will determine whether SECMP0009 should be approved by the Authority.

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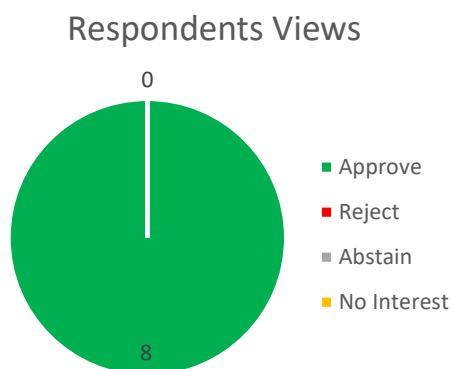
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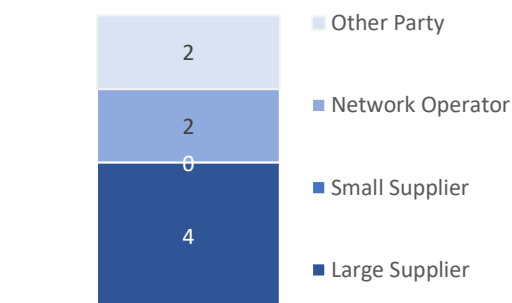
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Summary of Responses

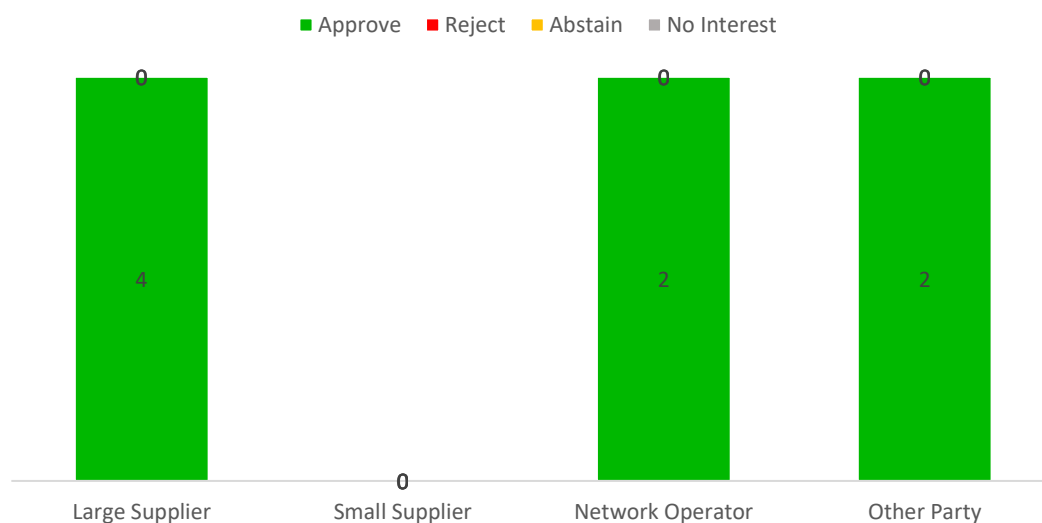
This section summarises the responses received to the SECMP0009 MRC.



**Number of Respondents
(by Party Type)**



Views by Party Type



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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	<p>We believe that the proposed solution better facilitates SEC Objectives (a), (d) and (f), for the following reasons:</p> <p>a) While the proposed Firmware Information Repository does not provide direct access to the firmware images that Suppliers may require, it should make it easier for Suppliers (especially new or smaller Suppliers) to identify how those firmware images can be obtained.</p> <p>(d) The proposed solution would help gaining Suppliers to maintain devices, giving consumers the confidence that they will switch Supplier without the functionality of their devices being negatively impacted.</p> <p>(f) Enabling Suppliers to more easily identify and obtain up to date firmware will ensure that the risk that devices continue to run on insecure versions of firmware is reduced.</p> <p>However we note that these objectives will only be better facilitated if the Firmware Information Repository is populated consistently and managed effectively, purely creating the Firmware Information Repository will not achieve these outcomes.</p>
E.ON	Large Supplier	Yes	<p>We agree that the proposed solution better facilitates objective d by allowing new entrants visibility of details pertinent to all relevant manufacturers (the value of this however will depend upon the details provided, the manufacturer is already communicated within Industry flows during the CoS process).</p> <p>We further agree that the solution proffered retains the security of Firmware data (images and release notes) and thus poses no negative impact to objective f.</p>

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			The current solution does not provide Firmware to Parties as was envisaged in the intent of this Modification, thus we believe that the current solution does not directly facilitate any other objective.
Western Power Distribution	Network Operator	Yes	We believe that this modification better facilitates SEC Objective (a) as it will facilitate efficient operation of Smart Metering Systems at Energy Consumers' premises.
SSEN	Network Operator	Yes	SSEN supports this modification as stated in the Final Modification report.
Itron Metering Solutions	Other	Yes	Yes, for proposed Firmware Information Repository solution. The proposed solution facilitates General SEC Objective (a) for the operation of Smart Metering systems, (d) for effective competition, and (f) for the security of Data and Systems.
SSE	Large Supplier	Yes	We agree that the proposed solution could be viewed to better facilitate SEC Objective (a) regarding the operational aspects for managing Smart Metering Systems firmware and would be more efficient for all Suppliers in being able to identify the relevant Manufacturers and their contact details. We believe the proposed solution is neutral against SEC Objectives (c), (d) and (f).
N Power	Large Supplier	Yes	As the proposer of this modification we believe the introduction of a centralised firmware library would facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems
National Grid	Other	Yes	Yes, as the amended proposal addresses any commercial concerns raised by parties

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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0009 should be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	Given the low cost of this change relative to the potential benefits, we agree that SECMP0009 should be approved.
E.ON	Large Supplier	Yes	We believe that this may be the first step toward the general dissemination of Firmware to Supplier Parties. We note however that should this modification be implemented, we would expect to see a review of this solution at some point post-implementation with a view to disregarding the spreadsheet if it is proving to provide no value, such that Parties are not paying for the maintenance of a spreadsheet that is not delivering Industry benefit.
Western Power Distribution	Network Operator	Yes	We believe that this modification will provide a valuable resource going forward as the market develops. As new firmware is released and Customers change Supplier it will aid the efficient operation of Smart Metering Systems and ensure that Suppliers can get the firmware required. The costs are low and original concerns around security with regards to firmware being highly available have now been addressed.
SSEN	Network Operator	Yes	No comment
Itron Metering Solutions	Other	Yes	Yes. The proposed solution facilitates General SEC Objective (a) for the operation of Smart Metering systems, (d) for effective competition, and (f) for the security of Data and Systems.

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SSE	Large Supplier	Yes	-
N Power	Large Supplier	Yes	-
National Grid	Other	Yes	Yes, as an Asset Provider working with multiple customers and manufacturers, a centralised firmware library reduces the administration/ risk of firmware updates not being shared in a timely manner.

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Question 3

Q3: Do you agree that draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	We have not identified any issues with the draft legal text.
E.ON	Large Supplier	No	<p>The Modification Report was sent back by Change Board such that the recommendations of the Security Sub-Committee (SSC) could be incorporated. The legal text however does not reflect the requirement for this spreadsheet to be locked or subjected to access controls. Further, the legal text does not reflect the requirement for either the SSC or a SECAS 'Security expert' to vet the proposed entries to the Firmware Information Repository (FIR). It is disappointing that these amendments have not been made because this has introduced weeks of inefficiency, and 'waste-work' for Parties in responding to a second consultation that does not meet the requirements of the 'send-back' from Change Board.- Noting here that the variation has not changed between consultation iterations, thus the Change Board are to vote on the same variation as they were asked to send-back.</p> <p>The Modification report makes no mention of the Panel being involved in this process and yet the legal text refers to the spreadsheet being established and maintained by them. We believe it would be more accurate for the text to convey that this spreadsheet will be set up and maintained by the Code Administrator (akin to the text in SEC Sections C and D etcetera).</p> <p>Our largest concern with the proposed legal text is that F2.17 places an obligation on the Party or any other person submitting details for CPL entry to provide the details required for the FIR. Neither Section F2, nor Appendix Z details any responsibility for any Party to provide details for</p>

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			<p>CPL entry. With the exception of the Hash and additional models under the same CPA Certificate, the obligations currently extend solely to the Panel and the establishment and maintenance of CPL, with Party involvement only being pertinent to the removal of entries from the CPL (Appendix Z 6.2). This obligation is further at odds with F2.15(c) wherein it is noted that the provision of data is at the discretion of the manufacturer, who may or may not be a SEC Party and therein bound or not by these obligations. Where the obligations concerning the Hash of the manufacturer image or to additional models under the same CPA Certificate being uploaded onto the CPL are relevant, F2.17 would obligate either the DCC or the Supplier Party to provide the details required for the FIR. The DCC and/or Supplier Party does not own the data required by the FIR and may not therefore be able to fulfil these obligations, especially where the intent of the modification and the corresponding legal text (F2.15(c)) permit these to be at the discretion of the manufacturer. To clarify, we do not believe it appropriate for a SEC obligation to be placed on Suppliers to provide mandatory data for the FIR that is at the discretion of manufacturers (free-text field), when uploading a CPL entry that adds a Device Model to an existing CPA Certificate, or when adding the Hash</p> <p>We are further concerned with the iteration of 'mandatory' within F2.15; this is entirely voluntary for manufacturers, and so we would question how the Panel or Administrator may 'ensure' the content of 'mandatory' fields. We feel that the legal text needs to convey the voluntary nature of the completion of this spreadsheet such as to minimise any risk to the fulfilment of these obligations.</p>
Western Power Distribution	Network Operator	Neutral	With regards to the draft legal text we feel that others will be better positioned to comment.
SSEN	Network Operator	Yes	No comment
Itron Metering Solutions	Other	Neutral	No comment

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SSE	Large Supplier	Yes	-
N Power	Large Supplier	Yes	-
National Grid	Other	Yes	Yes, I don't see any contentious changes to the legal text.

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Question 4

Q4: Do you agree with the Panel's agreed implementation date?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	We agreed with the proposed implementation date.
E.ON	Large Supplier	Neutral	Where the Modification solution meets the intent of the Modification we support Panel's view.
Western Power Distribution	Network Operator	Yes	We support an implementation date as soon as reasonably practical to ensure benefits can be realised.
SSEN	Network Operator	Yes	No comment
Itron Metering Solutions	Other	Neutral	No comment
SSE	Large Supplier	Yes	-
N Power	Large Supplier	Yes	-
National Grid	Other	No	No, as I am not clear from the proposal what 'practically possible' means and should be clarified. Modifications take a significant amount of time to implement and Firmware Mgt remains a key area of risk to SMIP for both SM1 and SM2 Cohorts as the installed device numbers increase, so would appreciate a view on a realistic implementation date.

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Question 5

Q5: Do you agree with the recommendation that the Repository should be locked and only available to SEC Parties?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	We agree with the SSC's recommendation that the Repository should only be available to SEC Parties.
E.ON	Large Supplier	Yes	We are supportive of the recommendations made by the SSC and as noted above are disappointed that these requirements have not been included within the legal text being consulted upon.
Western Power Distribution	Network Operator	Yes	We agree that the Firmware Information Repository should only be made available to SEC parties. This increases security and ensures only those that truly need the information can access it.
SSEN	Network Operator	Yes	Security is key to delivery smart meter related transactions.
Itron Metering Solutions	Other	Yes	Yes. The Repository (the spreadsheet that contains the information) should be locked, made available only to SEC Parties, and must never be made available to the general public in any way or form. If any SEC Party learns that the information has been made available to the general public, then Manufacturers should be informed immediately so that they can take appropriate mitigating activities.
SSE	Large Supplier	Yes	-

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N Power	Large Supplier	Yes	-
National Grid	Other	Yes	Yes, as non-SEC Parties would not be able to deploy firmware

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Question 6

Q6) Do you agree with the recommendation that the Repository should be vetted by a SECAS Security expert before publication?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	We agree with the SSC's recommendation that the Repository should be vetted by a SECAS Security expert before publication.
E.ON	Large Supplier	No	Our view is that the SSC ought to be the ones to vet any proposed entry to the FIR: we believe this to be a more future-proofed solution than a SECAS 'Security expert' because the former is a SEC-required and governed role, where the latter is not.
Western Power Distribution	Network Operator	Neutral	As a Distribution Network Operator, we feel that other parties will be better placed to answer this question.
SSEN	Network Operator	Yes	Security is key to delivery smart meter related transactions.
Itron Metering Solutions	Other	Yes	Yes. The Repository should be vetted by a SECAS Security expert before publication to ensure that any sensitive information (e.g. about security vulnerabilities) are appropriately worded.
SSE	Large Supplier	Yes	We are supportive of any measures taken by SECAS to ensure this information is held securely, vetting by a SECAS Security expert will be of benefit.
N Power	Large Supplier	No	-

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National Grid	Other	Yes	Yes, as this provides assurance to all parties that the solution has been properly vetted.

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Question 7

Q7: Do you have any further comments on SECMP0009?

Party Name	Party Category	Yes/No/ Neutral	Comments
EDF	Large Supplier	Yes	<p>While this change creates the obligation to provide information to the stored in the Firmware Information Repository, it does not require this information to be of any specific quality.</p> <p>While we recognise the difficulty in making this a specific SEC obligation in this section more specific, we believe that SECAS need to work with Manufacturers to better understand the sort of information that will be provided, and how this might be made as standardised and useful as possible. Creating a new Firmware Information Repository which contains low quality information is not going to be much (if any) of an improvement over the current SEC baseline.</p> <p>We would also recommend a post-implementation review 6 to 12 months following implementation of this change to understand whether Parties are actually using the new Firmware Information Repository, and what if any issues they are coming across.</p>
E.ON	Large Supplier	No	
Western Power Distribution	Network Operator	No	
SSEN	Network Operator	No	

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Itron Metering Solutions	Other	Yes	We support only the described 'Firmware Information Repository' solution as a way to provide contact information for suppliers who gain meters via customer churn. We do not support the Centralised Firmware Library that is described in the initial SECMOD009 documentation.
SSE	Large Supplier	No	-
N Power	Large Supplier	No	-
National Grid	Other	No	-

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