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SECMP0060 ‘Amend Requirements to remove ‘Pending’ devices from SMI’

Working Group Meeting 2

**18 February 2019, 1:00 pm – 1:45 pm, Gemserv Office, 8 Fenchurch Place,
London, EC3M 4AJ**

Meeting Summary

Working Group discussions

The Impact Assessment was discussed with the Working Group. They noted the change to the scope of the modification in an updated version of this Assessment (undertaken at no additional cost) to include all device types, rather than just Communications Hubs, a six-month lead time and a final cost of £71,217 for the modification up to the end of Pre-Integration Testing (PIT). The Working Group felt this better facilitated the initial concerns of the modification. One Working Group member stated this addressed their concerns originally presented in the Working Group Consultation responses.

The Working Group noted the views of the Security Sub-Committee (SSC) over SECMP0060. The Security Sub-Committee agreed with the solution put in place to make the period of time a device can remain ‘Pending’ on the Smart Metering Inventory (SMI) configurable. The SSC were also content with changing the duration to 36 months but felt it should be returned to 12 months in the future. No security concerns had been raised.

The Working Group discussed the responses in the Working Group Consultation and what actions had been taken to address them. SECAS provided updates over what actions had followed since the responses had been collated, which will be noted in the Modification Report.

- The extension of the scope of the modification’s solution to include all device types rather than solely Communication Hubs, with these having configurable values within the DCC’s systems as to how long they can remain on the SMI in a ‘Pending’ state.
- The solution has been amended to reflect that there will no longer be a reporting process implemented as part of this modification. This was due to the Proposer’s desire for it being at the individual User’s discretion to manage their existing stock of devices, rather than it being codified in the SEC.
- A cost-benefit analysis was undertaken and would be presented in the Working Group meeting, given the responses citing they wanted a stronger business case to approve the modification. See below for details on this.
- A verbal update was given over one respondent’s view that the modification conflicts against the DCC’s obligations that were stated in the SEC. The DCC and SECAS stated that the change in the SEC being presented was being administered to prevent devices which were still listed as ‘Pending’ prior to installation being removed from the SMI and charging the owner, rather than extending the period due to DCC being unable to meet existing

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obligations. A response will be sent back to the originator of these comments, and the DCC offered to speak directly to them if required.

The Working Group considered the business case presented by SECAS. This was based on information provided by the DCC over the costs of charges which industry would incur for Communication Hubs removed from the SMI and the cumulative number of Communication Hubs that would be affected if the modification wasn't implemented. It was noted that the cumulative number of Communications Hubs needing removal from the SMI could potentially exceed a million by December 2019. The charges cited under SEC Section K 'Charging Methodology' range from £36 - £50. When compared to the cost of the modification, members believed that there was a strong business case for the modification. Working Group members were asked if they could also provide any costs that they would incur for other devices if this modification wasn't implemented, although this was an optional action on the part of the Working Group members.

It was noted that the DCC currently has a workaround in place for any devices that should be removed from the SMI, to keep them on this list, which they noted is pragmatic but technically in breach of the SEC requirements. Members believed this needs to be made clear in the report. The Proposer believed it would mitigate the risk on the DCC if SECMP0060 was implemented. The effort required by the DCC in managing this workaround will be sought, to include in the case for whether to implement the enduring system changes proposed.

Next steps

The Working Group agreed with the implementation approach brought forward in the meeting, for the Modification Report to be presented to Panel in March 2019, subject to the modification being approved then proceeding to go to Change Board in April after a Modification Report Consultation is issued. If approved by the Change Board at this meeting, the modification could be included as part of the November 2019 Release.

The Working Group agreed their views against the General SEC Objectives hadn't changed since the first Working Group meeting where objectives (a) and (b) were unanimously better facilitated and that a majority believed (f) was better facilitated. Other than the cost-benefit analysis, the Working Group did not raise any further benefits or drawbacks to highlight in the report.

Further actions

The following further actions were agreed to be taken:

- SECAS will take the discussions in this meeting to the Working Group Consultation respondents to ensure their comments had been addressed ahead of presenting the Modification Report to Panel.
- Working Group members were given the option to provide SECAS with costs they would incur from an individual perspective if this modification wasn't implemented. Any analysis would form part of the business case and captured in the Modification Report.
- SECAS will update the Modification Report and annexes and circulate these to members to review.