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<b>Action:</b>	<b>For Decision</b>

## SECMP0069 ‘EU Exit Changes’ – Removing Support for Euros from the Technical Specifications

### 1. Purpose

This paper requests the Technical Architecture and Business Architecture Sub-Committee (TABASC) to consider whether, in light of the UK’s Exit from the EU, references to Euros should be removed from the SEC, and additionally whether we should consider their complete removal from all Devices.

### 2. Background

Ofgem have requested that all Code Administrators prepare the Modifications and legal text changes needed in the event that the UK leaves the European Union in a ‘No Deal’ scenario. Work has been undertaken by SECAS to identify all European references within the SEC and establish what changes will be needed if European Law no longer applies to the UK. The proposed changes have been raised as [SECMP0069 ‘EU Exit Changes’](#).

In summary, many of the references identified do not need to be removed. However, SECAS identified that the term ‘Euros’ and other related terms were used throughout SEC Schedules 8<sup>1</sup>, 9<sup>2</sup> and Appendix AD<sup>3</sup>. Whilst the SEC Lawyer agreed these could be removed, technical assessment found that there would be many complications introduced as a result of making changes to the technical specifications. For the purposes of SECMP0069, we refrained from removing these terms until further work can be completed to analyse the full impact.

<sup>1</sup> SEC Schedule 8 – GB Companion Specification

<sup>2</sup> SEC Schedule 9 – SME Technical Specifications

<sup>3</sup> SEC Appendix AD – DUIS (DCC User Interface Specification)

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### 3. Considerations

#### 3.1 Need for Supporting Euros

It is unknown whether there is any need to support Euros now or in the future. The Smart Metering roll-out covers the whole of Great Britain and if any of the constituent countries might adopt the Euro it would be prudent to retain the requirement to avoid the cost of removal and future replacement.

#### 3.2 Technical Considerations – Implications of Removing from SMETS, DUIS and GBCS

These considerations are only valid if it is considered that there is no need to support Euros.

##### i. Removing from SMETS

Assumption: The change to SMETS would simply remove the obligation for each Device to support Euros, meaning they may or may not actually support the Currency Unit.

Pros:

- Removing the requirement for a Device to support Euros would remove an unnecessary requirement which would presumably lead to avoided costs in developing (in the case of new entrants) and evidencing a Device's compliance<sup>4</sup>.

Cons:

- Removal would lead to the creation of new versions of SMETS. This may be possible via a Sub-Version for all Devices, given that it is simply a removal of an obligation and therefore no functional change would be required of any Device. Further investigation is needed to determine whether it would be more appropriate to change the requirement for Principle Versions to avoid possible conflicts between Device capabilities.
- CPL updates would presumably be required to incorporate CPA-approved firmware.
- These effects could be mitigated by scheduling this change with others.

Other implications:

- Support for Euros should be removed from DUIS if it is removed from SMETS. Failure to do so would lead to undefined behaviours if a User sent a Service Request to a Device to undertake an action that the Device is not required to support. DUIS would need to be updated concurrent with, or before, the update to SMETS.
- There would be considerable complexity if it were determined that the requirement to support Euros should be removed from SMETS but considered that use of Euros were valuable functionality beyond the minimum requirements of SMETS. This would lead to:
  - Retention of DUIS & GBCS capability;
  - Suppliers requiring a method to determine whether a specific end-Device supported Euros; and

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<sup>4</sup> Some testing regimes may test for Euro compliance, in which case there may be a short-term cost to update test packs.

- Definition of error handling in the event that Euros were sent to a Device that did not support Euros – either by the Data Service Provider (DSP) or by the Device.

## ii. Removing from DUIS

Pros:

- Removing the requirement for the DCC to support Euros would remove an unnecessary requirement which may reduce the cost of testing.

Cons:

- Removal would lead to the creation of another version of DUIS which would need to be implemented by all Users with the associated implementation and testing costs. This could be mitigated through scheduling with other changes. It may be possible to leave references in DUIS but find alternative methods to prevent (technically or through regulation only) the use of Euros.
- It may be necessary that all Users update versions of DUIS concurrently, or that the DSP System introduce validation to trap use of Euros and provide error responses if Euros were used in Service Requests – or accept the risk that this is an extremely unlikely event and that the consequences were manageable.

Other implications:

- Support for Euros should be removed from DUIS if it is removed from SMETS. Failure to do so would lead to undefined behaviours if a User sent a Service Request to a Device to undertake an action that the Device is not required to support. DUIS would need to be updated concurrent with, or before, the update to SMETS, noting that accepting risk may be possible, given the very limited probability that Euros are being used.

## iii. Removing from GBCS

Similar pros and cons as set out above for SMETS and DUIS are applicable for GBCS.

Other implications:

- If Euro support is removed from DUIS, it should be a purely economic decision whether to remove from GBCS – considering / risk the cost of removing the code against the cost / risk of maintaining it.
- If Euro support is retained in DUIS but removed from SMETS (i.e. it becomes optional, additional functionality) GBCS may need to be updated to define expected behaviour for a Euro Command sent to a Device that does not support Euros (which presumably leads to defining a requirement in SMETS).

## 4. What is the Proposal?

The preferred option is that the TABASC considers that retaining references to support for Euros is benign and not feasible to remove the requirement from the Technical Specifications.

However, should the TABASC consider that there is value in removing the requirement to support Euros, the initial suggestion would be:

- Remove references in SMETS (new Principle Version and potentially new Sub Version)

- Remove references in DUIS so Users cannot send Commands using Euros to Devices that potentially do not support Euros (or retain them but develop a method of disallowing Users from using Euros)
- Remove references in GBCS if it is economic to do so.

## 5. Recommendations

The TABASC is requested to:

- **NOTE** the contents of this paper;
- **AGREE** that the term 'Euros' and associated terms should remain in the SEC Schedules; and
- **AGREE** any actions either for the TABASC and / or SECAS to complete.

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14 March 2019