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SEC Panel Meeting 57

SECP_57_1506, 15th June 2018

10:00 – 13:30, Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	SEC Panel Members
SEC Panel Chair	Peter Davies
Large Suppliers	Simon Trivella
	Ashley Pocock
Small Suppliers	Karen Lee
Electricity Networks	David Lane
Gas Networks	Leigh Page
Other SEC Parties	Hugh Mullens
DCC	Tom Rothery

Representing	Other Participants
Ofgem	Raymond Elliot
BEIS (Secretary of State)	Duncan Stone
	Robert Thornes
DCC	Dan Lambert (Part)
	Amanda Rooney (Part)
	Fiona Tranter (Part)
	Ro Crawford (Part)
	Adam Phillips (Part)
CGI	Alan Jones (Part)
Meeting Secretary	Hollie McGovern

SECAS	Adam Lattimore
	David Barber (Part)
	Kayla Reinhart (Part)
	David Kemp (Part)
	Nikki Olomo (Part)
	Harry Jones (Part)
	Tim Newton (Part)
	Courtney O'Connor (Part)

Apologies:

Category	SEC Panel Members
Other SEC Parties	Gary Cottrell
Small Suppliers	Mike Gibson
Ofgem	Michael Walls

1. Minutes and Actions Outstanding

The minutes from the May 2018 SEC Panel meeting were approved ex-committee and circulated. The Panel noted that the majority of actions had been closed, with the outstanding actions on target for completion.

It was noted that Tom Rothery has officially replaced Helen Fleming as the DCC Panel Member.

The Panel **NOTED** the update.

2. Certified Products List Update

SECAS informed the Panel that the DCC Data Service Provider System issues that was blocking Certified Products List (CPL) uploads had been resolved on 12th June 2018, noting that there had been two successful uploads since then. There was agreement from the Panel that information regarding the issue and its resolution should have been issued more regularly and managed more effectively as information was not being provided consistently.

SECAS then presented the Panel with a summary of the SEC requirements, relevant Supplier Licence and DCC Licence obligations, BEIS guidance and provided a way forward with the existing entries, which does not require the Panel to alter or vary existing CPL submission processes.

The Panel noted that subsequent discussions had taken place between SECAS and a Large Supplier Member that resulted in a number of questions being submitted to BEIS on the:

- impacts of Technical Specification and GBCS version changes and associated interactions with the CPL, CPL submissions and CPL entry management; and

- the impacts on suppliers, the DCC and device manufacturers when Technical Specification version validity periods and/or GBCS applicability periods come to an end.

SECAS noted that following receipt of responses from BEIS on the questions, SECAS would prepare some supporting, user-friendly guidance to enable Panel and all interested parties to better understand the subject matter, while also aiding the Panel to make informed decisions in the future. A Panel Member suggested that as part of the preparation of the guidance that work examples could then be considered and included in the guidance.

The Panel:

- **NOTED** that no specific action is required by the Panel on the existing CPL entries since Licence obligations will ensure versions are corrected; and
- **NOTED** the approach to managing new CPL entries.

ACTION SECP57/01: SECAS to develop user-friendly guidance regarding the interactions between new versions of the Technical Specifications and GBCS and how the associated versions are managed on the Certified Products List.

3. DCC Release 2.0 Incentives Scheme Update

The Panel were provided with an update on the progress made with preparing the necessary information to facilitate the discharging of actions associated with the Baseline Margin Project Performance Adjustment Scheme for Release 2.0. The Panel were requested to agree the criteria for milestones 1A, 1B, 2A and 2B, in addition to the audit scope and approach for appointing the independent auditor that will provide additional independent input into the assessment of the criteria.

It was noted that DCC had developed more detailed criteria and the supporting evidence that would demonstrate whether the criteria has been met. It was noted that SECAS had reviewed the criteria and the proposed supporting evidence and DCC had actioned all feedback provided.

It was also noted that the supporting evidence that would be provided would enable the Testing Advisory Group (TAG), to give its view around User Interface Testing (UIT) entry and testing environment availability and the Operations Group to give its view on testing environment stability and availability. These views and recommendations would then help inform the Panel's decisions on the milestones.

A Panel Member raised concern around the deployment of future release code (SMETS1 release code) into the UIT environments and its impact on the ability for suppliers to complete associated regression testing. SECAS noted that the TAG is looking into the concern after it was raised recently at a Testing Development and Execution Group (TDEG) meeting. It was noted that the TAG would highlight any residual concerns, as part of its considerations of the milestones, and associated recommendations to the Panel.

The Panel discussed whether an issue could arise if problems are identified in the production environment because full regression testing has not been carried out in the testing environment. It was noted that the DCC Member would engage with the testing assurance team to provide more evidence to address this concern.

When considering the information on the appointment of the independent auditor, a Panel Member questioned whether there was sufficient time to undertake the procurement process before the next Panel meeting. DCC noted that it had already commenced the procurement process for an independent auditor, with the agreed audit scope slotting into the process that was already underway.

The output of the procurement would then be an award recommendation report that will be provided at the July 2018 Panel meeting for approval.

The Panel:

- **AGREED** the criteria for milestones 1A, 1B, 2A and 2B subject to the TAG's recommendations; and
- **AGREED** the proposed independent auditor scope provided for activities in support of incentive scheme milestones 2A, 2B, 3A, 3B, 4A and 4B.

ACTION SECP57/02: DCC's testing assurance team to engage with the Testing Advisory Group to provide evidence that its regression testing approach addresses concerns raised by testing participants and the TAG.

4. Release 2.0 Go-Live activities timetable planning

SECAS presented the details of forthcoming governance activities associated with R2.0 and the SMETS1 Service release, highlighting that there will be a need for additional Panel and sub-committee meetings to enable decisions and/or recommendations to be made on SMETS1 Service SIT Completion, R2.0 SIT and DIT completion and R2.0 Go-Live.

SECAS noted that the TAG and Operations Group will have sight of updates and information on testing progress to enable key matters and events to be picked up at scheduled meetings as and when they occur. This would help mitigate against both sub-committees having to review large amounts of information at one time, and therefore enable them to focus on key issues, defect categorisation and/or work-off plans. A Panel Member questioned whether the approach would work for SMETS1 SIT Completion. SECAS noted that as there would just be the completion report, the TAG consideration of it would be split across two sessions either side of the planned DCC Test Assurance Board (TAB) meeting. The first TAG meeting would be used to go through the SIT completion report. The second would focus on the outputs of the TAB meeting any the key items that may affect the resulting recommendation from the TAG.

The Panel:

- **NOTED** the update and
- **AGREED** that the additional Panel meetings should be scheduled.

5. Temporary Maintenance Schedule

DCC informed the Panel that it has identified a number of non-functional changes to the Data Service Provider's systems which would increase DCC system resilience, and requested the Panel agree an increase in the number of Planned Maintenance windows DCC are able to use between June and October 2018 in order to implement these changes. DCC also requested to change the notice period for these Planned Maintenance windows from 20 working days to 5 working days. The Panel requested DCC provide further information on its proposals, including the schedule of proposed changes, and the reasons for and benefits of each. Following this, DCC will consult with SEC Parties and the Operations Group.

Further information can be found in the confidential minutes.

6. SMKI and Repository Testing Part 3b Completion Report

Following the test assurance carried out by the DCC on Part 3b of SMKI and Repository Testing (SRT), the DCC provided the Panel with a confidential Completion Report.

It was noted that the SMKI PMA Chair had provided a letter to the Panel Chair, which confirmed that the SMKI PMA were satisfied that the test criteria for entry to and exit from SRT Part 3b had all been passed and recommended that the Panel approve the completion of SRT Part 3b.

The Panel **APPROVED** the completion of SRT Part 3.

7. Managing Events of Default

The Panel were presented with an overview of SECAS processes for responding to Event of Default notifications, and hypothetical Event of Default scenarios in order to discuss the types of Panel actions that may be appropriate in different circumstances.

The Panel requested SECAS to circulate the scenarios for them to provide comments, and it was noted that a work shop will be held in the near future to work through the scenarios and comments.

The Panel Chair requested more engagement from Ofgem, noting that they have a wider view of what is happening during Events of Default. Ofgem noted that it was keen to get involved.

The Panel:

- **NOTED** the contents of this paper (specifically the matters constituting an Event of Default, the Actions open to the Panel and what may be appropriate in each circumstances);
- **AGREED** the Event of Default process outlined in Section 3; and
- **AGREED** to provide comments on the scenarios presented with a view to further developing governance matters they wish SECAS to investigate in order to co-operate with others in addressing Events of Defaults.

ACTION SECP57/03: SECAS to hold a Panel Workshop to discuss potential Event of Default scenarios and consequential Panel actions.

8. Update on current Event of Default

SECAS provided the Panel with an update on the Event of Default that occurred in May 2018 and recommended further action in response. Further information can be found in the confidential minutes.

The Panel **NOTED** the developments in relation the recent Event of Default.

9. SEC Definition of Incidents

The Panel were informed of an issue that was recently raised at the May Operations Group meeting concerning DCC treatment of Incidents from Network Parties. The Panel were requested to determine if the scope of DCC Incident Management should extend to meter related issues. The Panel noted DCC and SECAS' interpretation that a meter is outside the scope of Incidents and Services as defined in the SEC per the SEC definitions of Incident and Services. However, the majority of the Panel were of the view that, Clause H9.2 (d) requires DCC to assign Incidents to the Responsible

Supplier. In addition, the Panel were of the opinion that that it would be more efficient and effective for DCC, with its central role in smart metering to allocate Incidents to responsible parties.

DCC noted that it had already been engaging with Network Parties, via the ENA, regarding this issue, and had already committed to reviewing its handling of these Incidents. DCC undertook to ensure that after initial investigations determine that the cause of the Incident may be with the meter, the Incident remains open on the DCC system and assigned to the Responsible Supplier, until the Responsible Supplier confirms that the matter is resolved.

The Panel **AGREED** with the Networks view that Clause H9.2(d) requires DCC to assign incidents to the Responsible supplier.

ACTION SECP57/04: SECAS to notify SEC Parties that DCC will now ensure that after an Incident is raised, and if initial investigations determine that the cause of the Incident may be with the meter, the Incident remains open on the DCC system and is assigned to the Responsible Supplier until the Responsible Supplier confirms that the matter is resolved.

10. SEC Panel Risk and Issue Register Update

SECAS provided the Panel with an update on the SEC Panel Risk Register and Issues Log, which included updates to two existing risks, and a new proposed issue.

SECAS informed the Panel that SEC Panel risk 15, which covers the DCC not having a sufficiently detailed or stable SMETS1 Enrolment and Adoption (E&A) design, has been updated, as a result of DCC taking action to remedy part of the risk. SECAS noted that while the risk has been reduced, there are still some outstanding issues relating to the risk. SECAS noted the Panel discussion and agreed to amend the risk to include reference that the risk was raised as part of a Security Sub-Committee review of its Risk Register.

SECAS also noted that risk 16, which relates to the insufficient capacity of the User Competent Independent Organisation (CIO), has been expanded to include SECAS, noting that the mitigation to the risk was amended to include SECAS looking to expand its resources.

SECAS informed the Panel that following the Technical Architecture and Business Architecture Sub-Committee (TABASC) review of its Risk Register at its May 2018 meeting, the TABASC have added a new risk which relates to the costs and timescales associated with the implementation of a Modification Proposal being too high and long. SECAS noted that the mitigations and actions required to remedy the issue are focused around the review of the SEC Section D provisions and the end-to-end Modification Process. The Panel discussed whether this was an issue or a risk, and it was agreed that it would accept the issue as it is and seek to revisit it at the July Panel meeting following the outcomes from the review of the SEC Section D provisions and the end-to-end Modification Process.

The Panel:

- **AGREED** the amendments to the SEC Panel Risk Register; and
- **AGREED** the new proposed SEC Panel Issue Register.

11. Change Status Report – June 2018

The Panel were provided with an update on the status and progress of Modification Proposals going through the Modification Process.

SECAS noted that it had engaged with the Proposer for SECMP0005 ['Include Tariff and Register Labels in SMETS Devices'](#), following the receipt of the Impact Assessment for the modification, which highlighted a cost of £4.1m. It was noted that the Proposer wished to proceed with the modification, and therefore the Working Group will need to meet to discuss the response and cost-benefits of the modification. SECAS requested a one-month extension to allow for these activities.

SECAS noted that it has now received the Impact Assessment for SECMP0015 ['GPF timestamp for reading instantaneous Gas values'](#), and noted that the Working Group will now need to meet before issuing its Working Group Consultation. SECAS requested a two-month extension to allow for these activities.

SECAS requested a one-month extension for SECMP0018 ['Standard Electricity Distributor Configuration Settings'](#), noting that it expected the Working Group Consultation documents to be issued mid-June 2018.

SECAS requested one-month extension for SECMP0025 ['Electricity Network Party Access to Load Switching Information'](#), noting the Working Group had agreed that further work was required to enhance the benefits case for the modification before the Modification Report can be presented to the Panel.

SECAS informed the Panel that the DCC has been carrying out work on how it manages traffic through the DCC Systems, and noted that this project may deliver what the Proposer is seeking from SECMP0028 ['Prioritising Service Requests'](#). SECAS noted that the Proposer has agreed to put the modification on hold while the DCC's project progresses and requested the Panel to agree to put SECMP0028 on hold for six months.

The Panel:

- **AGREED** a one-month extension for SECMP0005 ['Include Tariff and Register Labels in SMETS Devices'](#), with the DMR to be presented to the Panel in August 2018;
- **AGREED** a two-month extension for SECMP0015 ['GPF timestamp for reading instantaneous Gas values'](#), with the DMR to be presented to the Panel in September 2018;
- **AGREED** a one-month extension for SECMP0018 ['Standard Electricity Distributor Configuration Settings'](#), with the DMR to be presented to the Panel in August 2018;
- **AGREED** a one-month extension for SECMP0025 ['Electricity Network Party Access to Load Switching Information'](#), with the DMR to be presented to the Panel in July 2018; and
- **AGREED** to put SECMP0028 ['Prioritising Service Requests'](#) on hold for six months, with an update to be provided to the Panel by December 2018.

The Panel were also provided with an update from the DCC on the current progression of SEC Modification Proposals as they undergo Preliminary Assessments and Impact Assessments.

SECAS requested the Panel to provide any final comments on Ofgem's proposed new Code Administrator Code of Practice (CACoP) principle, before SECAS passed them back to Ofgem. The Panel had no additional comments on the proposed principle.

12. Modification Send-Back: SECMP0047

The Panel were informed that the Change Board has determined that SECMP0047 '[Default Provisions for Other SEC Parties](#)' should be returned to the Panel in order to reconsider the legal text to ensure that it fully delivers the proposed solution.

SECAS recommended the Panel return SECMP0047 to the Change Board unchanged, noting that it does not believe any edits to the legal text are required.

Following review of the legal text, the Panel agreed to return SECMP0047 unchanged to the Change Board, and SECAS agreed to communicate this with the Change Board Member who flagged the change initially.

The Panel **AGREED** to return the SECMP0047 Final Modification Report unchanged to the Change Board for it to vote on the modification.

13. Modification Proposal – Draft Modification Report for SECMP0019

SECAS presented the Panel with the Draft Modification Report for SECMP0019 '[ALCS Description Labels](#)'.

A Panel Member requested that a swimming pool label be added to the list of ALCS/HCALCS labels.

The Panel:

- **AGREED** that SECMP0019 is a Path 3 Modification Proposal;
- **AGREED** that the draft legal text delivers the intention of the modification;
- **AGREED** with the recommended implementation date of 1st November 2018; and
- **AGREED** that this modification be submitted to Modification Report Consultation.

14. Modification Proposal – Draft Modification Report for SECMP0044

SECAS presented the Panel with the Draft Modification Report for SECMP0044 '[User Security Assessment of a Shared Resource](#)'.

The Panel:

- **AGREED** that SECMP0044 is a Path 3 Modification Proposal;
- **AGREED** that the draft legal text delivers the intention of the modification;
- **AGREED** that the modification proceeds to Modification Report Consultation; and
- **AGREED** with the recommended implementation date of 10 Working Days following the end of the 10 Working Day referral period, which commences after the Change Board vote.

15. Modification Proposal – Draft Modification Report for SECMP0048

SECAS presented the Panel with the Draft Modification Report for SECMP0048 '[Extension of SMETS gas Valve exemption to include Large Gas Meters installed at Domestic Premises](#)'.

The Panel:

- **AGREED** that SECMP0048 is a Path 3 Modification Proposal;
- **AGREED** that the draft legal text delivers the intention of the modification;
- **AGREED** with the recommended implementation date of 1st November 2018; and
- **AGREED** that this modification be submitted to Modification Report Consultation.

16. June 2019 Release

SECAS and DCC provided the Panel with an update on the June 2019 Release scope and progress, including the draft Release Implementation Document (RID) and Technical Architecture Document (TAD).

DCC informed the Panel that it had received the Preliminary Assessment which detailed costs Design and Build for the IRPs (CR303) as well as for SIT and UIT support for the entire June 2019 proposed scope. DCC noted that the costs received for SIT are higher than DCC expected. DCC noted that at present it does not believe these costs are economic nor efficient and they are in the process of challenging the implementation approach proposed, along with the associated costs.

As such DCC does not believe it is prudent to provide details of full costs. It was noted that the rationale from the Service Providers are that the costs reflect the current structure and plan for regression testing, which currently involves at least 24,000 individual tests. The Panel Chair commented that they had not envisaged SIT would involve testing of every meter device and firmware combination. One Panel Member felt these tests, performed collectively, once, is more efficient than performing the tests in UIT. DCC noted that it would like to review alternative options for SIT, taking into consideration the costs and risks associated, and will keep the Panel updated.

The Chair queried what activities the test lab will be undertaking, and DCC noted that the test lab's initial functionality is to support UIT phase. DCC will fully investigate the option to move SIT for the June 2019 Release into the test lab.

The costs of SIT are a fixed cost irrespective of the level of functionality being delivered. The Panel discussed whether the Release could still happen in June 2019, and any dependency upon Release 3.0 (SMETS1 and Enrolment and Adoption) Final Operational Capacity (FOC). DCC noted that the timetable for the June 2019 Release being worked to has 28th June 2019 as the date for Go Live. After reviewing the costs of Design, Built and PIT for the Scope the Panel agreed the scope of the Release, noting that at this stage DCC are unable to provide detailed costs for SIT only, and are currently addressing the issue of the costs associated with SIT.

DCC presented Panel with the key risks associated with the Release. A key risk highlighted was the impact that any delays to Release 2.0 or SMETS 1 Enrolment & Adoption would have on the SIT testing plan and testing environments used for the June 2019 Release. The Panel noted the risks presented by DCC, and agreed that the Panel need to be notified if DCC believe it cannot deliver the June 2019 Release.

A Panel Member queried whether Release 2.0 and SMETS1 would include testing of every device combination and DCC noted that both releases will.

The Panel agreed that DCC needs to provide the Panel with a scope and range of the cost in order to enable Users to better prepare for a potential increase in costs for them, and to ensure the June 2019 Release remains stable. DCC noted that the Charging Statement is currently being negotiated with

industry and that the June 2019 Release will be within the costs budgeted in the Statement, and noted that it will report back to the Panel on the costs.

The Panel:

- **AGREED** the scope of the June 2019 SEC Release, subject to clarification of the overall cost of the Release;
- **NOTED** that DCC is unable to provide detailed costs for the release and will provide an update on this at the next meeting;
- **NOTED** the risks associated with the June 2019 Release; and
- **NOTED** DCC will review the risk profile associated with SIT and will present alternative options for this stage.

17. BEIS Update

BEIS presented the Panel with an update regarding the transfer of R2.0 and Enrolment and Adoption (E&A) Release materials to enduring governance. BEIS noted that when the Go-Live decision is confirmed items relevant to Release 2.0 and the E&A Release respectively that transitional governance does not consider necessary to continue to manage itself in terms of its rollout leadership role will be sent to the Panel to consider including in its risk register or issue log and subsequently removed from the IMF risk register or TBDG issue logs accordingly. It was noted that any work off plans in operation at the time of Go-live for R2.0 and E&A will be made available to SECAS.

A Panel Member queried what would happen to Issue Resolution Processes (IRP) following the June 2019 Release, and BEIS noted that it would continue to manage the IRP process; managing IRPs relevant to R2.0 or the METS1 Release and transferring others to SECAS to deal with as appropriate.

BEIS also provided the Panel with an update on the forthcoming consultations and key milestones.

A Panel Member requested clarification on whether or not the SMETS1 end date has been delayed, noting the frustration amongst some Parties with the lack of information available, and the difficulty this causes in forward planning. BEIS noted that a decision would be made relatively soon.

The Panel **NOTED** the update.

18. DCC Update

The DCC presented the Panel with an update on the activities undertaken since the last Panel meeting.

Production Status

DCC noted that over 1000 meters have now been installed. There was discussion around whether that means meters that are installed and operating, and DCC noted it looks to share a more detailed breakdown of these numbers than the ones presented (which are also shared with the Smart Metering Design Group (SMDG)).

DCC noted that work is being carried out in relation to the Registration Data Provider (RDP) data issue, and that a report will be issued to Panel in due course.

SMETS1 and SMETS2 Release 2.0 Delivery

DCC noted that it had received a large number of responses for the Transition and Migration Approach Document (TMAD) consultation, which are now being analysed. DCC note that it intended to issue the results of the consultation in the next few weeks.

Production Proving

DCC noted that a Tactical Production Proving solution is being implemented to give DCC a basic production proving capability prior to R2.0. DCC noted that following an open procurement process, it is now engaging with one vendor who will operate in the Other User role to undertake production proving on behalf of DCC.

DCC noted that a limited solution will be implemented with controls in place to ensure no conflict exists between existing regulatory and security arrangements, and noted that details of the solution have been shared with the Operations Group and Users. DCC noted that the Tactical solution is not an enduring solution, and will provide insight into how the systems are working. It was noted that the enduring solution is still being developed by DCC.

The Panel **NOTED** the update.

19. SEC Panel Member Elections

The Panel were informed of the scheduled elections for the SEC Panel Elected Members, following vacancies arising from the retirement of Elected Members after their 24-month term.

The Panel **NOTED** the update.

20. SEC Panel Sub-Committee Report

SECAS provided the Panel with an update on recent activities from all the SEC Panel Sub-Committees. In addition, a confidential update was provided on the assurance statuses that the Security Sub-Committee (SSC) have set for Parties during May 2018.

The Panel **NOTED** the update.

21. DCC Reporting

The Panel were provided with the Certificate Signing Requests (CSR) Forecast Variance Report and the Service Request Variance and Metrics Panel Report issued to the Panel from the DCC as required by the SEC.

The Panel **NOTED** the contents of the paper.

22. Operations Report

The Panel were presented with the Operations Report for May 2018. The report provided an outline of the activities undertaken by the SECAS team in support of the SEC, in addition to a breakdown of days by driver, product and grade.

The report informed the Panel of the Parties that have officially completed the User Entry Process as described in SEC Section H1.10 and confirmation of Parties that have completed various testing activities as required by the SEC.

The Panel noted that the following organisations would be admitted as Parties to the SEC following countersignature of their Accession Agreements by the SECCo Board:

- Exelon Generation Limited (Small Supplier);
- Flexitricity Limited (Small Supplier);
- Shell Energy Europe Limited (Small Supplier);
- ENSEK Ltd (Other SEC Party);
- N3rgy Limited (Other SEC Party); and
- ZIV Automation UK Ltd (Other SEC Party).

The Panel **NOTED** the report.

23. Smarter Markets Project Update

SECAS provided an overview of the developments and work undertaken in April 2018 in support of the Smarter Markets project.

The Panel **NOTED** the update.

24. Transitional Governance Update

SECAS presented the Panel with an update from the transitional governance entities and other smart metering related meetings and workshops attended by the SECAS in the last month.

The Panel **NOTED** the contents of the paper.

25. SEC Panel Activity Planner

The Panel were presented with the SEC Panel Activity Planner. The Activity Planner provides a high-level overview of the forthcoming Panel activities, and a forward look at Panel agenda items for the next three months based on the latest information available.

The Panel **NOTED** the contents of the paper.

26. Any Other Business

SECAS provided a brief update on the preparations for the SEC Party Engagement Day, which is scheduled for 12th July 2018.

The Panel Chair informed the Panel of an issue relating to Post-Commissioning obligations that was initially identified at the SMKI PMA meeting on 15th May 2018. It was noted that during Commissioning, some Suppliers are putting the incorrect Network Operator SMKI Certificates on the Device, or are leaving the DCC's Access Control Broker (ACB) SMKI Certificates on Devices, which is resulting in the Network Operator being unable to communicate with the Device or receive alerts. The Chair noted that the SSC will continue to monitor the Post-Commissioning Reports, and liaise with the Operations Group and provide advice to the Panel where appropriate. The Panel **AGREED** to write to SEC Parties, reminding them of the Post Commissioning obligations.

ACTION SECP57/05: SECAS to communicate with SEC Parties to remind them of their Post-Commissioning obligations.