SEC
Smart Energy Code

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Paper Reference:	CSC_02_2304_02
Action:	For Discussion

New Draft Proposals

1. Purpose

This paper provides a summary of all the new Draft Proposals raised since the last Change Sub-Committee meeting. We will verbally update the Change Sub-Committee on any further Draft Proposals that are raised prior to the meeting. We invite members to provide any views and comments on this Draft Proposal at this initial stage, which will help us in our assessment of the associated problem statement.

2. New Draft Proposals

DP072 'Change of Supplier process'

DP072 has been raised by Kieran Williams of SmartestEnergy. The Lead Analyst from SECAS is Joe Hehir.

An issue has been found following Change of Supplier (CoS) testing by the Proposer with another Supplier, in which a data change request was submitted for the other Supplier to regain their meter back following testing carried out by SmartestEnergy, with effect from 18 September 2018. For reasons unknown to SmartestEnergy, the Supplier in question did not action their CoS Service Requests. Subsequently SmartestEnergy noticed they had been receiving daily reads from a device that they no longer had responsibility for.

With no official process or escalation point to stop receiving unwanted alerts SmartestEnergy received a total of 234 alerts, with roughly 78 of these messages containing specific readings with the date and time of a customer SmartestEnergy were no longer the Supplier for.

We have been engaging with SmartestEnergy and the other Supplier to understand the full picture. We will also be engaging with other Suppliers to understand if this is an isolated incident or whether this is a wider issue, and what impact this is having.

The draft problem statement containing the information provided by the Proposer can be found in Appendix A. This problem statement will be updated as we investigate the issue further during the Development Stage.

3. Recommendations

The Change Sub-Committee are requested to:

- **PROVIDE** any initial views and comments on this new Draft Proposal.

Ali Beard

SECAS Team

15 April 2019

Attachments

- **Appendix A:** DP072 draft problem statement

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DP072 'Change of Supplier process' Problem statement – version 0.2

About this document

This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

Proposer

This Draft Proposal has been raised by Kieran Williams from SmartestEnergy.

What is the issue or problem identified?

Change of Supplier testing scenario

A potential General Data Protection Regulation (GDPR) issue has been found following Change of Supplier (CoS) testing with a Supplier, in which a data change request was submitted for the Supplier to regain their meter back following testing carried out by SmartestEnergy, with effect from 18 September 2018. For reasons unknown to SmartestEnergy, the Supplier in question did not action their CoS Service Requests. It was not until trying to resolve an issue with a meter manufacturer that SmartestEnergy noticed they had been receiving daily reads from a device that they were no longer the Supplier for.

SmartestEnergy were advised by the Triage team at the Data Communications Company (DCC) that for them to stop receiving these alerts, the other Supplier needed to issue Service Request 6.23 'Update Security Credentials (CoS)'. Despite numerous attempts requesting this, it took the other Supplier 50 days to properly acknowledge the request and to issue the Service Request. This resulted in SmartestEnergy receiving three to four alerts per day (only one of these alerts would contain the customer read, the rest contained DCC E4[1] response codes). With no official process or escalation point to stop receiving unwanted alerts SmartestEnergy received a total of 234 alerts, with roughly 78 of these messages containing specific readings with the date and time of a customer SmartestEnergy were no longer the Supplier for.

What may have caused this issue?

This issue has been raised with the DCC, and at several industry groups including the Smart Metering Design Group (SMDG), the Security Sub-Committee (SSC) and the Common Issues and Pilot groups. The DCC have identified two root causes:

1. Gaining Supplier is not registered in DCC Systems and is therefore unable to send Service Request 6.23 to update their security credentials; and
2. Gaining Supplier is registered in DCC Systems, but due to their system/process maturity or other issues, they have failed to send Service Request 6.23.

Smartest Energy have made the DCC aware of a third cause, Erroneous Transfers.

How does this issue relate to the SEC?

The Proposer expects this issue to impact Section H 'DCC Services' as this section hosts the obligation on enrolment and exchange of certification after installation and would be a suitable section for any CoS related definitions.

[1] Verify that the User, in the User Role defined in the Service Request is an Eligible User for the Device.

What is the impact this is having?

What are the impacts of doing nothing?

The Proposer believes that this issue could potentially become more serious as rollout continues. The December 2018 SMDG DCC update confirmed a total of 1,046 Service Request 6.23 requests were not initiated (an increase of 288 since November 2018) with numbers expected to continue to rise. Should the same scenario experienced in testing happen in Production, and using the figures provided by the DCC, the DCC and SmartestEnergy, as a Supplier, would receive roughly 244,764 alerts, with 81,588 containing reads belonging to customers SmartestEnergy are no longer responsible for.

There is currently no process that SmartestEnergy have been made aware of when it comes to this scenario. The DCC are already aware of the amount of Service Request 6.23s that have not been initiated and they have informed SmartestEnergy that they receive regular emails on issues with installs and sending/receiving Service Requests.

By doing nothing the DCC will need to ensure their systems can tolerate this additional traffic, on top of traffic from sending or receiving other Service Requests. It also means that Suppliers will need to dedicate time and resources to sift through the alerts and make up their own minds with what they should do with information that they should not be holding.

How could this issue impact SEC Parties?

This issue would impact Large and Small Suppliers as they may receive alerts for supply points they are no longer responsible for. It will also test data retention plans that Suppliers should have in place, confirming what actions need to be taken when dealing with data they should not be receiving.

Other SEC Parties, like the DCC, will be affected by an increase in alert traffic (inbound and outbound alerts) they will receive.

As Service Request 6.23 also affects Gas Suppliers as an eligible user, there is likely to be an impact for Gas Suppliers.

These impacts on other Parties will be further investigated during the Development Stage

What are the views of the industry?

Views of the DCC

The DCC have advised that this issue could be addressed by the Proposer raising a defect and provided advice as to how the Proposer could do this. However, the Proposer highlighted that they raised a defect, but it was subsequently closed with them still unclear on what the solution should be.

The DCC also noted that this issue resulted from a failure to follow the CoS process rather than a technical issue in the first instance. They added that this Draft Proposal needs to answer the question as to whether DCC operational guidance covers the resolution on what Service Users need to do, or if a Modification Proposal is required in order to put technical safeguards into place.

Views of SEC Parties

Prior to this Draft Proposal being raised, the Supplier in question investigated the scenario further and understood why it occurred. They advised that the scenario in question could occur in the 'live' environment depending on how Suppliers have designed their read processes and that there will always be occasions when a gaining Supplier doesn't issue CoS Service Requests in a timely manner (or is unable to do so). It was the Supplier's view that this Draft Proposal should not result in a Modification Proposal as the scenario in question relies upon specific Supplier processes being in place.

The views of other Parties will be gathered during the Development Stage.

Views of Panel Sub-Committees

The views of Panel Sub-Committees will be gathered during the Development Stage.

Views of the Change Sub-Committee

The views of the Change Sub-Committee will be gathered during the Development Stage.