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<b>Paper Reference:</b>	<b>CSC_03_2805_03</b>
<b>Action:</b>	<b>For Decision</b>

## DP072 Draft Proposal decision

### 1. Purpose

This paper provides a summary of our assessment of [DP072 'Change of Supplier process'](#), taking into account industry views and views of the Panel Sub-Committees on the problem this Draft Proposal has identified. We are asking the Change Sub-Committee (CSC) to agree that the problem identified under this Draft Proposal is clearly understood and that it is ready to progress to a Modification Proposal.

### 2. What is the issue?

[DP072 'Change of Supplier process'](#) has been raised by Kieran Williams of SmartestEnergy.

An issue was found by the Proposer following Change of Supplier (CoS) testing with a Supplier, in which a data change request was submitted for the gaining Supplier to regain their meter back following testing carried out by SmartestEnergy, with effect from 18 September 2018. For reasons unknown to SmartestEnergy, the gaining Supplier in question did not action their CoS Service Requests. Subsequently Smartest Energy 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.

The problem statement containing the information provided by the Proposer and updated by SECAS during our initial investigations can be found in Appendix A.

### 3. Comments on the issue

Comments were received from three SEC Parties, including the Data Communications Company (DCC). Two Parties suggested possible solutions to the issue which the Proposer could be implemented now without requiring a Modification Proposal. An Other Party suggested a possible solution; although this was not explored as this proposal is still in the Development Stage, the DCC suggested further steps in response for which the Proposer could implement now in order to address the issue.

The Technical Architecture and Business Architecture Sub-Committee (TABASC), Operations Group and the Security Sub-Committee (SSC) all commented on this proposal and were of the view that a

Modification Proposal would not necessarily be the best route to address the issue. All were of the view that additional guidance on the CoS process would be the most effective way to address the issue.

The SSC also noted the Proposer's comments in this being a General Data Protection Regulation (GDPR) issue but advised the Proposer that this is a data privacy issue rather than a security issue. The SSC added that it is the Supplier's responsibility to discard this data and meet their GDPR obligations, including the losing Supplier in the scenario raised by the Proposer.

The collated comments and questions can be found in the 'What are the views of the industry' section in Appendix A.

## 4. Next steps

During investigation of this Draft Proposal, it is clear that the industry agrees there is an issue. However, the overwhelming majority of people who commented believe this is an issue that can be resolved through improved guidance, and that no Code changes are needed. The Technical Architecture and Business Architecture Sub-Committee (TABASC), Operations Group and the Security Sub-Committee (SSC) also unanimously agreed that the issue raised by the Proposer did not necessarily require a Modification Proposal and that it could be addressed by providing more guidance on the CoS process.

It is the Proposer's decision whether to proceed with a Modification Proposal. If the Proposer does wish to proceed, we and the Proposer have agreed that there is a solution which we both feel resolves the issue and we will circulate draft legal text for the Panel to consider at their next meeting. We welcome any comments from the CSC before this is presented to Panel. We recommend that if this is to progress to a Modification Proposal, that it should proceed to the Report Phase.

## 5. Recommendations

The Change Sub-Committee are requested to:

- **AGREE** that the issue identified under DP072 is clearly defined and understood;
- **RECOMMEND** to the Proposer that this Draft Proposal shouldn't be converted to a Modification Proposal;
- **RECOMMEND** to the Panel that, if the Proposer decides to proceed, this Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMEND** to the Panel that any Modification Proposal should proceed to the Report Phase.

Joe Hehir

SECAS Team

20 May 2019

### Attachments

- **Appendix A:** DP072 problem statement