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SEC Panel Sub-Committee Report

1. Purpose

This paper provides the Panel with an update on recent activities from the Panel Sub-Committees. It highlights the key issues discussed and details specific points the Sub-Committees would like to bring to the Panel's attention. The Panel are requested to note the updates.

2. Operations Group

2.1 Operations Group Meeting Highlights

Major Incidents

In review of three Major Incidents from April, the OPSG were extremely concerned that large unexpected volumes of Service Requests, or other volume related issues, was listed by the DCC as a cause or contributory factor for the outages. This is particularly worrying for Parties as the DCC was afforded a considerable amount of additional maintenance last year to ensure its systems were prepared for operating at scale. The DCC has committed to providing the OPSG assurance that its Service Providers have capacity in place to deliver Services according to requirements.

Communication Hub Firmware Updates

A Large Supplier member highlighted several concerns with the approach to Firmware updates for DCC Communication Hubs. The OPSG agreed that the process as it stands is not as it should be and, also, that the number of defects being encountered within Firmware is very problematic. The DCC agreed to recirculate the existing Firmware roadmap and summary of migration pathways, and to consider updating and improving them as necessary. The OPSG also emphasised the urgency to correct this process, in light of the DCC planned Over The Air (OTA) upgrade for R1.X to R2.0 hubs later this year. A further concern is that a performance metric related to OTA had been at "Amber" status or worse for 5 consecutive months.

SSI Enhancements and Transition

The OPSG noted that the work to improve the Self-Service Interface (SSI) under the interim arrangements approved by the Panel is now coming to an end. A closure report summarising the outcomes, costs, and benefits of this work will be prepared for the Panel. Subsequent work on the SSI will be conducted under the enduring provisions put in place by SEC Modification ['SECMP0058 Changes to the governance of the Self-Service'](#), to be implemented on 27 June 2019.

Data Quality Issues Sub-Group

The OPSG Data Quality Sub-Group (DQSG) advised that it was proposing to close some issues and had undertaken a reprioritisation exercise of the remaining issues from the original Request for Information. It was noted that, in order to move forward with the issue of “Incorrect DNO certificates” on Meters’, that a report from the DCC showing which certificates are on all meters for Network operators to check, would be required. This report has been outstanding for some time. The DCC has committed to produce the report as soon as possible or inform the OPSG why this is not possible. The ‘WAN Coverage Checker Accuracy’ issue has been resolved; however, this has revealed another issue with incomplete address data due to the field not being mandatory in DCC User Interface Specification (DUIS).

Live Services Criteria SMETS1 Enrolment

The OPSG has now received an initial draft of the Live Services Criteria (LSC) document from the DCC, and will be providing initial feedback to the DCC on 10 June 2019. The DCC has agreed to provide a further updated version of the LSC documents on 17 June prior to its planned final submission on 5 July 2019. The OPSG will be holding an extraordinary meeting on 12 July 2019 to formally review the final LSC submission from the DCC,

to formulate its recommendation for Panel consideration. The OPSG noted that the commencement of live migration operations proposed by DCC would be restricted to a defined subset of the IOC.

3. Security Sub-Committee and SMKI PMA

3.1 Assurance Status Decisions

The Security Sub-Committee (SSC) set two Assurance status’ in May 2019. Details can be found in confidential Appendix A.

3.2 Verification Assessments

As part of their wider obligations, the SSC review the outcomes of Verification User Security Assessments. If the SSC believe that a User is non-compliant, or potentially non-compliant, with obligations contained in SEC Sections G3-G6, then they will notify the Panel.

During May 2019, the SSC reviewed five Verification User Security Assessments (VUSAs) in which Compliance Status’ were set. Details of the VUSAs can be found in confidential Appendix A.

3.3 Director Letters

The SSC reviewed two Director’s Letters in April 2019 which were approved and can be found in confidential Appendix A.

3.4 Security Self-Assessments

No Security Self-Assessments were reviewed by the SSC in May 2019.

3.5 SSC Highlights

SMETS1 Appropriate Standards

An update was provided to SSC members on the development of guidance for Users from the User CIO concerning how to prepare for User Security Assessments and how to interpret the SEC

obligations in respect of the application of an 'Appropriate Standard' of security to be applied to SMETS1 Smart Metering Systems. The SSC considered the proposed recommendations and agreed that further information would be required to consider an assurance approach.

Sub-Committee Input During the Modification Process

The SSC were provided with an update which was previously presented to the OPSG, and Technical Architecture and Business Architecture Sub-Committee (TABASC), which summarised the framework for assessing Draft Proposals and Modification Proposals with the intention to seek the Sub-Committee's input into their development moving forward.

Post Commissioning Report

The SSC Chair noted that the last Post Commissioning Report received was on 5 April 2019 for the period ending February 2019 and noted that the DCC had experienced problems in providing the data. However, the SSC requested the next Post-Commissioning Report as soon as practically possible.

The SSC noted the update and agreed that a further discussion should be held at the next SSC meeting on 12 June 2019 to discuss findings of the report in depth.

SOC2 Final Report

The DCC presented the breakdown of findings within the SOC2 Report via an excel collated spreadsheet. The SSC agreed for a further update to be provided at the SSC meeting on Wednesday 26 June 2019.

SEC and NIS / CAF Alignment

The SSC were provided with a proposal by the SSC Chair to align the Agreed Interpretations and Security Controls Framework (SCF) Part 2, to demonstrate how the requirements of the Network Information Systems (NIS) Directive and its associated Cyber Assessment Framework (CAF) align with the SEC Security Requirements.

3.6 SMKI PMA Highlights

SMETS1 Update

The SMKI PMA were provided with an update on SMETS1 Device Installation and SMKI XML Signing Key Recovery, with a further update regarding DCC/nCipher proposals and SMETS Initial Operating Capability (IOC) Live Services Criteria.

New Draft Proposals and Modification Proposals

SECAS presented to the SMKI PMA the new Draft Proposals that have been raised since the April SMKI PMA meeting specifically Draft Proposals 071 to 076. It was confirmed that there were no further updates to ['DP073 'alteration of SMKI repository information and documentation'](#) and [DP074 'clarity on obtaining SMKI device certificates'](#) which had been raised, however [DP075 'third party metering service providers'](#) was supported by the Security Sub-Committee's decision and views regarding the proposal. No further comments were raised on the remaining Draft Proposals, noting that these did not impact the SMKI arrangements.

4. Technical Architecture and Business Architecture Sub-Committee (TABASC) and Testing Advisory Group (TAG)

4.1 TABASC Highlights

SMETS1 Services Release Business Architecture Document (BAD) & Technical Architecture Document (TAD)

The SMETS1 Services Release Business Architecture Document (BAD) and Technical Architecture Document (TAD) are being updated following the industry review. The final documents are scheduled to be published on 10 June 2019.

New Draft Proposals and Modification Proposals

The TABASC noted the following four new Draft Proposals that have been raised since the April meeting, and confirmed its involvement is not required at this point:

- [DP073 'alteration of SMKI repository information and documentation'](#)
- [DP074 'clarity on obtaining SMKI device certificates'](#)
- [DP075 'third party metering service providers'](#)
- [DP076 'pursuing non-payment in events of default'](#)

2020 SEC Releases

SECAS provided the TABASC with the proposed scope of the June 2020 and November 2020 SEC Releases. The TABASC provided their views on the impacts of the modifications targeted for each release.

4.2 TAG Highlights

Release 2.0

DCC provided an update on the resolution of the issues that have been impacting SIT completion for the north region; the TAG agreed that the exit criteria have been met, leaving only Fylingdales Communications Hub variant remaining.

DCC also provided an update on the challenges they have faced in gaining sub-GHz Devices to complete Release 2 Device Integration Testing (DIT). BEIS has agreed with a recommendation from the DCC to complete R2.0 without a second manufacturer's devices, subject to conditions. TAG will work with DCC to share information about asset availability for the regression testing agreed.

SMETS1

A revised timetable for go-live decision making has been shared and agreed between DCC and TAG (and other sub-committees). Extra TAG meetings are being scheduled to support the timetable.

The TAG's focus remains on migration testing and system capacity testing.

The DCC's consultation on the Migration Testing Approach Document has completed, and the DCC is expected to submit the final document to BEIS prior to the Panel meeting. DCC is now engaging regarding the 'Breadth and Depth' of migration testing and a briefing session arranged for 13 June. A current point of discussion is ensuring that Devices continue to work, and no data is lost, after applying a new meter configuration prior to Device migration onto the DCC Systems.

DCC held a briefing session in May to explain the approach to system capacity testing. The lack of an integrated performance testing environment has led to testing on a component-by-component basis. Subject to this caveat and some queries around assumption used, the approach to load testing appears sound.

November 19 Release

As previously mentioned, engagement with TAG regarding the November 19 Release has commenced. The changes appear relatively simple. The complexity will arise from the use of environments and code management to test multiple releases in quick succession – IOC, MOC, FOC, November 19, plus issue resolution. The DCC has committed to providing environment plans and code management plans.

5. Recommendations

The Panel is requested to **NOTE** the content of this paper.

Holly Burton

SECAS Team

7 June 2019

Attachments:

- Appendix A: User Security Assessments – Identified Non-Compliances (**RED**)