Stage 03: Modification Report

SECMP0011:

Including the MAP ID in the Smart Metering Inventory

SECMP0011 seeks to extend the scope of the Smart Metering Inventory (SMI) to keep a record of the Meter Asset Provider (MAP) Identifier (MAP ID) for each Gas and Electricity Smart Meter. SECMP0011 will help MAPs who are using the Data Communications Company (DCC) for tracking which supplier rents their assets, and assist MAPs and suppliers with dispute resolution regarding asset ownership and rental.

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SECMP0011 impacts the Smart Metering Inventory and how it is maintained.

Users who pre-notify Smart Meters (typically suppliers) to the Smart Metering Inventory and those who are responsible for maintaining it will be required to implement SECMP0011.

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

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About this document

This document is the Final Modification Report (FMR) for SECMP0011. The Change Board will consider this report as part of their deliberations on whether to approve or reject the Modification Proposal.

This document has three attachments:

- Attachment A: Solution Design Document and Legal Text;
- Attachment B: Working Group detailed considerations (white); and
- Attachment C: Modification Report Consultation Response.

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1. Summary

This section provides an overview of SECMP0011. Defined terms and acronyms used in this document are listed in the Glossary (Appendix 1) of this document.

1.1 Why Change?

MAPs estimate that by 2020 they will own £6.5 billion worth of Smart Meter related assets. Unlike electricity MAPs, gas MAPs have no access to industry data flows that associate meters with MAP IDs in real time. This means that gas MAPs need to rely on suppliers informing them when their assets have changed hands (e.g. on a Change of Supplier (CoS) event). MAPs have indicated that access to up-to-date industry data would help prevent many disputes.

1.2 Solution

The proposed solution is to extend the scope of the SMI to include the MAP ID for each piece of Gas and Electricity Smart Metering Equipment (GSME and ESME). This will enable MAPs who have become a User to interrogate the SMI to help with asset tracking. Suppliers can also make use of this new functionality to track the asset owner. It should be noted that MAPs who are not a User will not have access to this information. When pre-notifying GSME and ESME, Users will be required to include the associated MAP ID. Suppliers will also be required to ensure that each GSME and ESME is pre-notified to the SMI.

1.3 Impacts and Costs

Users who pre-notify Smart Meters to the SMI, and those who are responsible for maintaining it, will be required to implement SECMP0011.

The estimated DCC implementation costs are circa £937,000. The DCC has included provisions for the potential cost of SECMP0011 into the DCC Charging Statement for Regulatory Year 2017/2018.

1.4 Implementation

The recommended implementation approach for SECMP0011 is:

- implementation on **28th June 2018**, if a decision to approve is made by 1st June 2017; or
- implementation on **1st November 2018**, if a decision to approve is made after 1st June 2017, but before 2nd October 2017.

1.5 Working Group's Views

The Working Group's (WG's) views on SECMP0011 were either neutral or supportive of implementing SECMP0011. Certain WG Members noted that the inclusion of MAP ID in the SMI will help address the issue of limited industry data access that gas MAPs are facing. However, the WG also observed that including electricity

MAP IDs in the SMI will duplicate the information that is already available to electricity MAPs, which may lead to disputes.

1.6   Modification Report Consulation Responses

18 SEC Voting Groups (representing a total of 22 SEC Parties) responded to the Modification Report Consultation. Of the responses received, one Large Supplier and the majority of Other SEC Parties were in favour of SECMP0011.

2. Why Change

2.1 Background

Currently, existing data flows allow electricity MAPs to track who rents their assets. This information is available to electricity MAPs in real time. This means that electricity MAPs are aware of when an asset has changed hands because of a CoS event. Conversely, gas MAPs do not have access to corresponding data flows, and therefore need to rely solely on supplier notifications to update their asset tracking systems.

2.2 What is the issue?

MAPs forecast that by 2020 they will own £6.5 billion worth of Smart Meter related assets. The lack of access to the industry data flows, to assist with asset tracking, is likely to expose gas MAPs to significant losses.

If MAPs were Users, the SMI could offer MAPs increased visibility of their assets which would assist with dispute resolution.

Four options have been considered by the industry to give gas MAPs access to data that would assist with asset tracking, some of which are outside of this governance framework:

- **Option 1 -** Amend the Uniform Network Code (UNC) to give access to existing data flow associating GSME with MAP ID to gas MAPs;
- **Option 2 -** Include MAP ID in the Central Registration System (CRS);
- **Option 3 -** Record MAP ID for each GSME and ESME in the SMI; or
- **Option 4 -** Record MAP ID for each GSME and ESME in the SMI, and make available a report associating suppliers, GSME/ESME and MAP ID.

Gas MAPs investigated the possibility of being given access to the existing data, under Option 1. However, due to concerns around liability associated with access to such data[1], gas MAPs did not pursue this option further.

Option 2 was also discounted because the CRS is not expected to be available until late 2019, and at this stage there is no certainty on the inclusion of MAP ID in the CRS.

Option 4 was considered by the WG but was not progressed further. This is because the proposed report would expose commercially sensitive information, and access to it would need to be heavily restricted and controlled. The information to be included in the suggested report was likely to be considered as 'personal'. This would mean that MAPs with access to the report would need to ensure they were compliant with the Data Protection Act. The Proposer concluded that this added complexity would be a barrier to uptake and decided to withdraw the requirement for the report.

On this basis, the WG developed a detailed solution to support Option 3.

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[1] http://www.gasgovernance.co.uk/sites/default/files/MOD422.pdf

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3. Solution

3.1 Proposed solution

SECMP0011 was raised by Utility Funding Limited and proposes that the SMI should record the MAP ID in respect of each GSME and ESME. Users that pre-notify meters to the SMI will be required to include a corresponding MAP ID as part of the notification.

In addition to their existing SEC Obligations[2], This Modification will require Users to ensure that the MAP ID is populated for meters pre-notified to the SMI, before the implementation of SECMP0011, by the date that will be determined by the SEC Panel. This will ensure that the SMI is complete and becomes a reliable asset tracking tool for MAPs who are Users.

To ensure that Users can discharge their obligations, this modification requires that the DCC amends existing Service Requests (SRs) used for pre-notifying Devices to the SMI (SRV 12.2. Device Pre-Notification) and for updating the SMI (SRV 8.4 Update Inventory). To assist MAPs that are Users, when interrogating the SMI, the DCC will update an existing SR that enables Users to read the SMI (SRV 8.2 Read Inventory), and include the MAP ID in the following reports available to Users on the Self-Service Interface (SSI):

- RSMI_001 Installation Status Smart Meter Report;
- RSMI_002 Smart Metering Devices Status and Firmware Report;
- RSMI_003 Smart Metering Devices Status and Model Report;
- RSMI_004 Communications Hub with No Attached Devices Report;
- RSMI_005 Scheduled Service Requests Report; and
- RSMI_007 Device Certificate Report.

Since there is a degree of uncertainty about the number of GSMEs and ESMEs pre-notified to the SMI, it is proposed that the process for updating the SMI with the MAP ID, for pre-notified meters, is managed by the DCC. This process is as follows:

- Five Working Days (WDs) after the implementation of SECMP0011, Users will be required to notify the DCC of the number of MAP IDs to be updated.
- In order to assist Users with fulfilling this obligation, the DCC will create a bespoke report on the SSI.
- Within five WDs from receipt of such information from the Users, the DCC will confirm to each User how many 'Update Inventory' SRs it can send each day and the timing for sending them.
- Users will then be expected to complete the process by a date that will be determined by the Panel.
- The DCC will submit monthly reports to the Panel setting out each Users progress against its obligation.

This will process will avoid potential significant demand spikes that could lead to excess traffic and potential network availability problems.

Legal text supporting the implementation of SECMP0011 can be found in Attachment A.

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[2] As set out in clause 2.10 of SEC Appendix AC – Inventory, Enrolment and Withdrawal Procedures

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SECMP0011 will result in a new version of DUIS. The changes provided in Attachment A have been drafted against DUIS v1.0, if approved and implemented the changes will form part of and result in a new version of DUIS. The version number of this new version will depend on prior changes being implemented.

4. Impacts and Costs

The following section sets out the summary of the likely impacts arising from SECMP0011, as identified by the WG and SEC Parties.

4.1 Parties

Users that pre-notify GSMEs and ESMEs to the SMI will be required to include a corresponding MAP ID as part of the notification. Users will also be required to ensure that the MAP ID is populated for meters that were pre-notified to the SMI before the implementation of SECMP0011.

Users who implement SECMP0011 will be required to update their DCC User interface in order to send and receive new versions of SRs that include the Device Serial Number (DSN).

Users (primarily supplier Users) will need to test SECMP0011 as part of its implementation. The User Testing requirements can be found in section 5.2 and in Attachment A.

4.2 Central Cost

To implement SECMP0011, the DCC will need to update its Systems as detailed in the DCC Impact Assessment[3].

4.2.1 DCC

The table below details the estimated cost to deliver the changes and services proposed under this Modification Proposal:

Implementation costs (excluding VAT)							
Implementation Phase:	Design	Build	Pre-Integration Testing	System Integration Testing	User Testing	Implementation to Live	Total
SECMP0011	*£121,400*	*£242,800*	*£242,800*	*£260,000*	*£20,000*	*£50,000*	**£937,000**

The DCC noted that implementing SECMP0011 at the same time as SECMP0004 and SECMP0008 will result in the following savings:

- a reduction of circa 20% in costs can be assumed for System Integration Testing and User Testing; and
- a reduction of circa 33% in costs can be assumed for Implementation to Live.

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[3] https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011_dcc_-impact-assessment-v1-0.pdf?sfvrsn=0

The combination of these savings will reduce the overall individual cost of SECMP0011 to approximately **£868,500**. A total cost savings of £68,500.

The DCC has included provisions for the potential cost of SECMP0011, should it be approved and implemented, into the DCC Charging Statement for Regulatory Year 2017/2018.

SECAS impacts

The Code Administrator's cost will be limited to the time and effort of making the necessary amendments to the SEC, release a new version to SEC Parties, and the publication of it on the SEC Website. This is estimated at 2 Man Days effort, which will be approximately £1,200[4].

4.3   Other potential impacts

There are no impacts on consumers, Greenhouse Gas Emissions, and/or other industry codes.
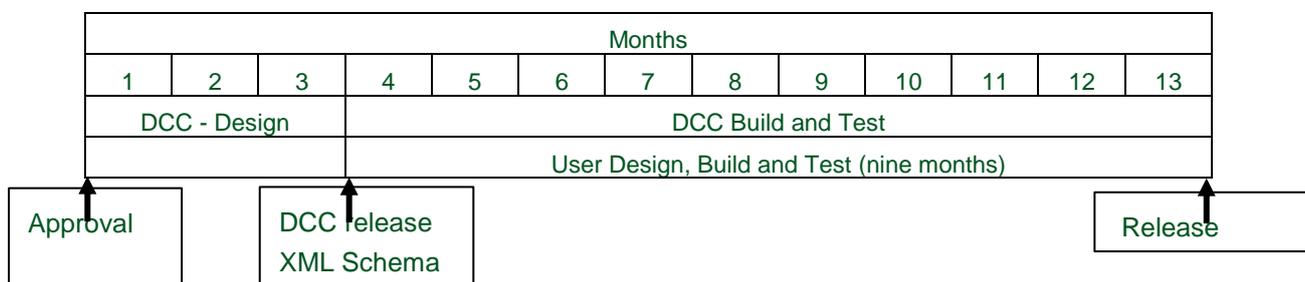
5.   Implementation

5.1   Timelines

The WG noted that SECMP0011 should be implemented in the next available release. The Workgroup therefore recommends the following implementation approach:

- SECMP0011 to be implemented in the **June 2018 Release**, if a decision to approve is made by **1st June 2017**; or
- SECMP0004 to be implemented in the **November 2018 Release,** if a decision to approve is made after 1st June 2017 but before **3rd October 2017**

The DCC have indicated that they require 13 months to implement SECMP0011 as well as three months from the approval date to build the XML Schema. This means the XML Schema will be available in approximately nine months prior to the release implementation date. This will give Users wishing to implement SECMP0011 in June 2018, nine months to design, build and test their systems. The exact timescale will depend on when SECMP0011 is approved.

Months												
1	2	3	4	5	6	7	8	9	10	11	12	13
DCC - Design			DCC Build and Test									
			User Design, Build and Test (nine months)									

Approval

DCC release XML Schema

Release

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4 Based on a blended rate of £600 per day.

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5.2   Testing

5.2.1   DCC Testing

As described in the [DCC's Impact Assessment](#), the DCC will carry out Pre-Integration Testing (PIT) and SIT for SECMP0011.

PIT includes the tests that each Service Provider performs on its respective system changes, prior to the integration of all Service Provider Systems.

Suggested PIT scope will include:
- production, review and agreement of a design to enable development;
- low level design production, development, unit test and any rework to achieve PIT complete status;
- data generation and loading into the Test environment;
- execution of System Tests through sufficient iterations to enable PIT complete;
- design, implementation and execution of FAT scripts in accordance with assurance procedures used for Release 1.2; and
- achieving PIT complete status and subsequent reporting.

SIT is the testing of the DCC's Total System, which brings together the component parts of the DCC's System (e.g. DSP and CSP Systems) to allow testing of the end-to-end solution by the DCC. The SIT activity is done for every DCC System release and incorporates the test and integration of multiple changes.

Additional SIT is recommended by DCC for a modification of this type. It should however be noted that the scope of SIT is likely to be more focused on regression testing to confirm that the changes applied as part of this modification have not had an impact on the wider DCC Total Systems.

Suggested SIT scope would at a high level typically include:
- System Test script and data design;
- data generation and loading into a co-ordinated System Test environment; and
- execution of System Tests through sufficient iterations to enable SIT complete.

5.2.2   User Testing

The WG agreed the following high level requirements for SECMP0011 User Testing:

- testing should be optional for Users, although a minimum of two Parties should undertake and pass User testing of the SECMP0011 functionality before the new functionality goes live;
- the testing environment that the DCC provides as part of Testing Services will be open to all User Roles and multiple Users within each User Role to ensure that any User wishing to test SECMP0004 is able to do so. This environment should be made available for a minimum of 15 working days.

It is anticipated that the DCC will drive, at the request of the Panel, the development of the testing services and documentation that will set out how it will complete the testing of the new functionality within its systems. This may be a form of focus Integration Testing and/or User Entry Process Testing. The testing approach documentation, will form a wider release implementation document, that will cover SECMP0011 (if approved) and any other approved Modification Proposals that are included alongside or in addition to it.

Attachment A contains supporting legal text covering the requirements for the development of release implementation documentation and testing approach documentation.

6. Case for Change

This section contains the views of the Proposer and WG regarding the modifications benefits and drawbacks against the SEC Objectives[5].

6.1   Proposer's views

The Proposer's overall view was that SECMP0011 will allow for better tracking of their assets. By fronting the costs of smart devices, MAPs are investing significantly into the Smart Meter rollout. To mitigate risks of assets being misplaced MAPs will charge higher rental costs for their devices. SECMP0011 will improve the current situation by reducing risks which in turn will reduce these premiums. As reduced premiums will benefit all suppliers, the Proposer suggests that **SECMP0011 better facilitates General SEC Objective (d)**.

The Proposer also noted that **SECMP0011 will better facilitate General SEC Objective (a)** by allowing better tracking of assets and therefore, improved interoperability between suppliers.

The Proposer noted that the SMI may not be the ideal repository for this data although, other methods have been attempted and were not feasible. The Proposer advised that repositories such as the CRS, which form part of Ofgem's Faster Switching project, may be more suited for this data. However, there is significant uncertainty as to the implementation date of this service and its scope.

6.2   Working Group Discussions

When considering the benefits and drawbacks of SECMP0011 the WG discussed the following:

Benefits

Whilst the WG noted some benefits of SECMP0011 (as set out in section 6.3 of this document), its cost of implementation and the additional supplier obligations have significant impacts which mean **the benefits of this modification are marginal**.

Drawbacks

The WG noted that the SMI was not created to track legacy devices and that the GB energy industry should strive for consistency and replicate a repository similar to ECOES, which contains electricity MAP IDs. It was suggested that the Supply Point Administration Agreement (SPAA) may be a better alternative. The WG also highlighted that the benefits of this modification decrease as the implementation date grows closer to the implementation of Ofgem's CRS.

The WG noted that depending on how well suppliers are able to track their assets, the backfilling process for SECMP0011 may be challenging.

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[5] SEC Objectives

Suppliers finally noted that, if SECMP0011 were to be implemented, there is still a possibility of the SMI containing inaccurate data.

6.3   Working Group Consultation responses

Ten Parties responded to the Working Group Consultation (three Large Suppliers, one Small Supplier, three Network Parties and three Other SEC Parties).

Of the ten respondents, **Five Parties agreed that SECMP0011 benefits the SEC Objectives** set out in section 6.3 above. Two Parties did not agree citing the CRS and SPAA as a better repository for MAP ID.

Full responses and views are contained in Attachment B, along with the Working Group's detailed considerations and response to each of them.

6.4   Sub-Committee views

The Security Sub-Committee (SSC) has been kept informed throughout the refinement of SECMP0011 and has no security concerns.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) also noted no concerns regarding the impacts of SECMP0011 on the Technical and Business Architecture.

As the changes proposed by SECMP0011 do not relate to Smart Metering Key Infrastructure Management Authority matters, this Sub-Committee was also unaffected by the modification.

The Alternative Home Area Network (Alt HAN) forum is also unaffected by SECMP0011 as the changes do not relate to Alt HAN matters.

6.5   Working Group's views against SEC Objectives

The WG (including the Proposer) agreed that SECMP0011 better facilitates the following General SEC Objectives:
- **(a)** the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain; and
- **(d)** the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.
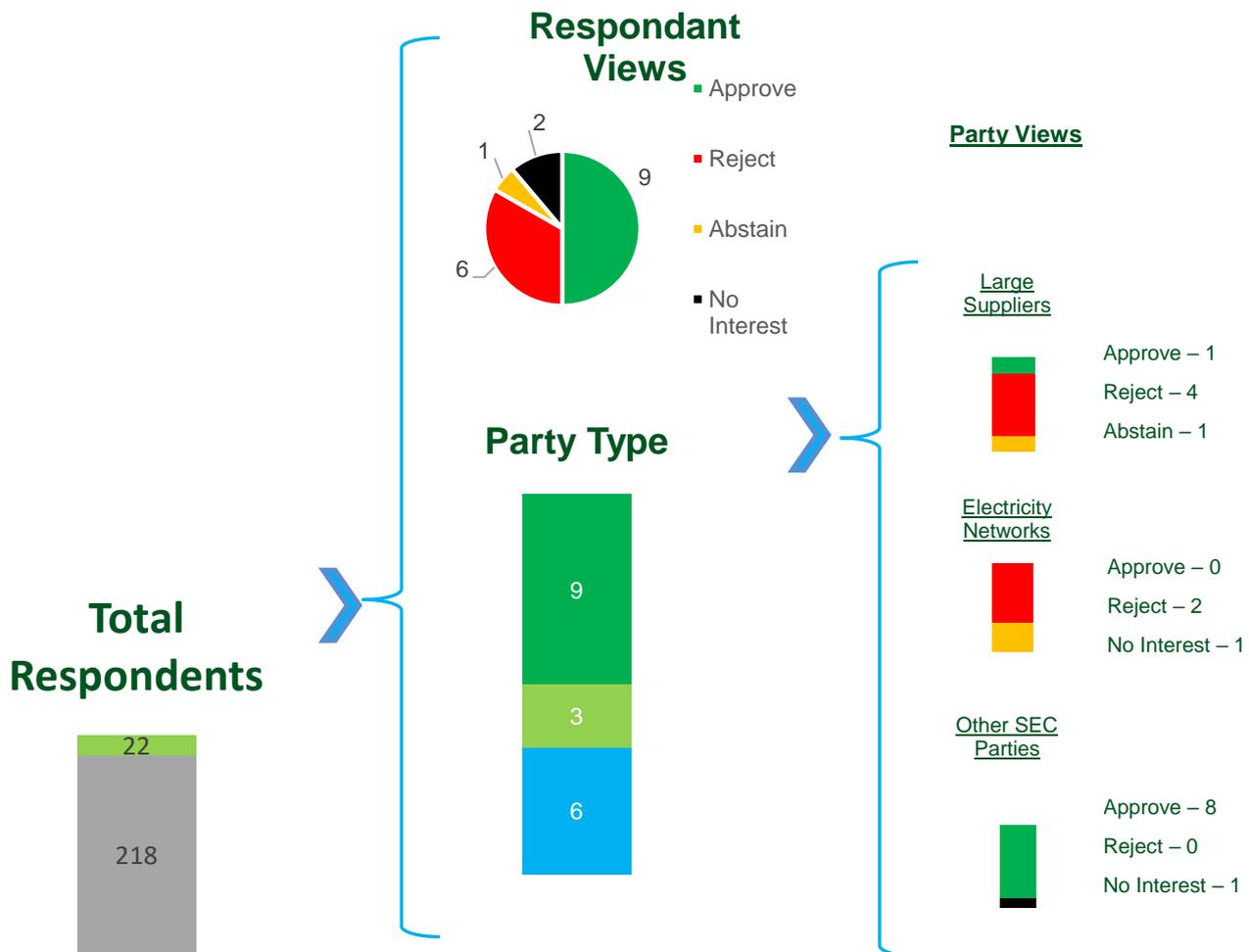
The below table provides the WG's rationale:

Summary of WG's view against the SEC Objectives		
SEC Objective	Benefits	Drawback
(a)	Half of the WG agreed (the remainder being neutral) that SECMP0011 would benefit the smart meter rollout by having a central repository for all MAP IDs.	The WG noted that the SMI may not be the ideal repository.
(d)	The WG mostly agreed (the remainder being neutral) that SECMP0011 does better facilitate SEC Objective (d), through MAPs charging lower premiums.	None

7. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. 18 respondents, representing a total of 22 SEC Parties, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment C.

7.1   Summary of Responses

Respondant Views

- Approve
- Reject
- Abstain
- No Interest

Party Views

Large Suppliers

Approve – 1
Reject – 4
Abstain – 1

Electricity Networks

Approve – 0
Reject – 2
No Interest – 1

Other SEC Parties

Approve – 8
Reject – 0
No Interest – 1

Party Type

9
3
6

Total Respondents

22
218

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7.2 Summary of Modification Report Consultation respondent's views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0011		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
	N/A	High implementation cost. Duplication of data in the case of Electricity MAPs as their MAP IDs are kept in the ECOES.

Summary of Networks' views for and against SECMP0011		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
	N/A	High implementation cost.

Summary of Other SEC Party views for and against SECMP0011		
SEC Objectives	**Benefit(s)**	**Drawback(s)**
(d)	SECMP0011 will lead to more accurate data on the meters they use which will enable them to verify asset rental invoices provided by MAPs. MAPs, as the major financing parties behind smart meters, are looking to improve meter asset tracking in the most effective manner in respect of cost, timing, transparency, accuracy and ease of implementation	N/A

8. Change Board Decisions

Each Change Board Member is requested to:

- **CONSIDER** the Final Modification Report and the Modification Report Consultation Responses (Attachment C);
- **CONSIDER** whether or not the Final Modification Report should be returned to the SEC Panel with recommendation for further clarification and/or analysis;
- **VOTE or ABSTAIN** on the Modification Proposal; and
- **PROVIDE** rationale as to whether the Modification Proposal will or will not better facilitate the SEC Objectives.

Appendix 1 – Glossary and References

Glossary	
Description	**Term**
ADT	Anomaly Detection Threshold
BEIS	Department for Business Energy and Industrial Strategy
CRS	Central Registration Service
DCC	Data and Communications Company
SPAA	Supply Point Administration Agreement
SR	Service Request
UNC	Uniform Network Code

References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	**Link**
SECMP0011 – Modification Proposal Form v3.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011/secmp0011---modification-proposal-form-(ver-3).pdf?sfvrsn=0
SECMP0011 – Initial Modification Report v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011/secmp0011---initial-modification-report-1-0.pdf?sfvrsn=0
SECMP0011 – WG Consultation v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011---working-group-consultation.zip?sfvrsn=0
SECMP0011 – DCC Preliminary Assessment v1.1	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011_dcc_preliminary-impact-assessment-v1-0.pdf?sfvrsn=0
SECMP0011 – DCC Impact Assessment v3.1	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0011_dcc_-impact-assessment-v3-1.docx?sfvrsn=0
SECMP0004 – SECAS Modification Register	https://www.smartenergycodecompany.co.uk/modifications/modification/SECMP-4
SECMP0008 – SECAS Modification Register	https://www.smartenergycodecompany.co.uk/modifications/modification/SECMP-8

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