SEC Panel Meeting 70

SECP_70_1207, 12 July 2019

10:00 – 12:30, Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	SEC Panel Members
SEC Panel Chair	Peter Davies (PD)
Large Suppliers	Ash Pocock (AP)
	Simon Trivella (ST)
Small Suppliers	Karen Lee (KL)
	Mike Gibson (MG)
Electricity Networks	Paul Fitzgerald (PF)
Gas Networks	Leigh Page (LP)
Other SEC Parties	Gary Cottrell (GC)
	Mike Woodhall (MW)
DCC	Ro Crawford (RC)

Representing	Other Participants
Ofgem	Michael Walls (MWa)
BEIS (Secretary of State)	Duncan Stone (DS)
	Robert Thornes (RT)
Citizens Advice	Ed Rees (ER)
DCC	Robert Newby (RN) (Part)

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	Peter Hammond (PH) (Part)
Testing Advisory Group Chair	Phillip Twiddy (PT)
Meeting Secretary	Hollie McGovern (HM)
SECAS	Abigail Hermon (AH)
	Nick Blake (NB) (Part)
	Fiona Chestnutt (FC) (Part)
	David Kemp (DK) (Part)
	Adam Lattimore (AL) (Part)

1.   Minutes and Actions Outstanding

The minutes from the June 2019 SEC Panel meeting and additional Panel meeting held on 21 June 2019 were approved ex-committee and circulated. The following action updates were provided:

Action Reference	Action
SECP65/07	SECAS to seek further input on whether either option (in a SoLR event where the SoLR Supplier wishes to maintain the systems of the Defaulting Supplier) would present any material change to User systems. SECAS to consult with SSC, SMKI PMA and TABASC.
The Panel agreed to close this action and raise the following new action: SECAS to investigate the temporary deferment of certificate updates to minimise day one disruption in a SoLR event. Action: **CLOSED**	
SECP68/11	DCC to consider the information shared whether this should be restricted to the group by the DCC at the various forums and or shared more widely e.g. with SEC Parties.
The DCC presented the Panel with its Information Classification and Handling Standard and it was agreed this action could be closed. Action: **CLOSED**	
SECP68/12	DCC to provide the Panel with a breakdown of costs for SECMP0007 and confirmation that the costs have been reviewed and are reasonable for consideration at the June Panel meeting.

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Action Reference	Action
SECAS (DK) informed the Panel that they intended to request an Impact Assessment for SECMP0007 which will be brought back to Panel as soon as possible. Action: **CLOSED**	
SECP68/13	SECAS to coordinate the provision of a plan on a page with BEIS and the DCC which will demonstrate the different elements of the release, when they will be implemented and the dependencies, to be an ongoing document.
SECAS presented the Panel with a draft plan which was discussed under agenda item 13 and the Panel provided comments. Action: **CLOSED**.	
SECP69/08	DCC to provide the Panel with a complete overview of the personal data breach (from 10 May 2019) at the July 2019 meeting.
The DCC provided an overview of the data breach under agenda item 3. Action: **CLOSED**	

SECP70/01: SECAS to investigate the temporary deferment of certificate updates to minimise day one disruption in a SoLR event.

The Panel **NOTED** the updates in the Actions Paper and **AGREED** that any actions marked as CLOSED could be formally closed.

2. Privacy Assessment Reviews – Other User 'O' and Other User 'H' (AMBER)

The Panel considered a Privacy Assessment Report for Other User 'O' and a Privacy Self-Assessment for Other User 'H'. The agenda item was marked as AMBER and therefore recorded in the Confidential Minutes.

The Panel **AGREED** the recommendations for Other User 'O' and Other User 'H'.

3. 'Read Inventory' Personal Data Breach overview (GREEN)

The DCC provided the Panel with an overview of a 'Read Inventory' Personal Data Breach that was reported to the DCC on 10 May 2019, and outlined the next steps the DCC are taking to prevent another breach from occurring in the future.

The DCC determined the root cause of the breach to be a Partial Address matching issue, where in some circumstances, 'Read Inventory' can match the incorrect smart metering system.

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The DCC noted that the intention of communications to Users was to inform them of a General Data Protection Regulation (GDPR) breach, however he DCC recognised that incorrect technical information had been provided to Users on 15 May; it was noted that it was initially reported that 2 Service Request Variants (SRVs) were creating the issue, however the DCC now understand that the 'Request WAN Matrix' was not responsible for any of the incorrect data matches.

The DCC recognised that the post incident report had cast the Party that raised the issue in a negative light; the DCC noted that the Party was available and acted over and above what was expected throughout the investigation.

The DCC noted that it would be taking the following steps to ensure the event does not happen again:

- Improving engagement with DCC Users' Data Protection Officers and teams;
- Ensuring a Quality Review of communications takes place
- Reviewing technical answers to avoid the GDPR issue; and
- Conduction a risk assessment relating to MPXN and postal address data in future operations.

A Member (MG) noted that poor data quality within the industry, as a whole, will mean that similar issues will likely occur in the future, and noted the importance of the DCC's next steps. It was noted that the Security Sub-Committee (SSC) were also comfortable with the next steps.

A Member (KL) noted that the inaccuracy of the communication regarding the breach was the biggest issue, noting that the invalidated SRV caused confusion for Users, and requested the DCC to implement quality control on all communications before they are issued. The Member quered whether the DCC intended to engage with affected Users regarding internal controls, noting that a second communication had not been issued to Users to retract the first, incorrect communication. The Panel requested the DCC to issue a communication to Users clarifying that the 'Request WAN Matrix' was not responsible for any of the incorrect data matches and summarising the DCC's next steps to prevent another breach from occurring in the future.

The Panel **NOTED** the update.

SECP70/02: DCC to issue a communication to Users clarifying that the 'Request WAN Matrix' was not responsible for any of the incorrect data matches and summarising the DCC's next steps to prevent another breach from occurring in the future.

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4.   November 2019 SEC Release Testing Approach Document

The Panel were informed that the DCC has consulted upon the November 2019 SEC Release Testing Approach Document (TAD) and that the Testing Advisory Group (TAG) has reviewed it on behalf of the Panel.

The TAG Chair (PT) highlighted the TAG's key outstanding concerns, including environment sharing and code management, duration and timing of User Testing and the inclusion of a Non-Release 19 Change Request.

The TAG Chair noted that the TAG was meeting concurrently to the Panel on 12 July to discuss the remaining concerns, and that a clean recommendation from the TAG would be provided to the Panel at its additional meeting scheduled for 19 July, on whether the November 2019 SEC Release should proceed.

The Panel **NOTED** that it is required to review the SEC Release Testing Approach Document and **AGREED** that an update will be brought to the Panel on 19 July.

5.   Request to host information on the SEC website

SECAS informed the Panel that it had received two separate requests to host information, useful to the market, on the SEC website. SECAS noted that the requests related to the following information:

- Intimate Communications Hub Interface Specification (ICHIS) Host RF Noise Emissions; and
- SMETS1 Pre-Payment Meter Interface Device (PPMID)

The Panel were in agreement that the information would be useful to industry. SECAS noted that it will perform limited validation of the data received, and the Panel noted that a caveat should be included to state that the information has been provided by manufacturers, and SECAS has not undertaken any assurance on the information.

The Panel Chair noted a request that was raised at the most recent Smart Meter Design Group (SMDG) meeting for a DCC User list to be hosted on the SEC website. SECAS noted that there is a SEC Parties list currently published on the SEC website and that website members (i.e. SEC Parties) can log in to the website to then view the SEC Panel Operations Report paper from each month. The Operations Report includes Parties who have completed the User Entry Process each month, but not a list of Live DCC Users. The DCC host and publish this information separately.

The Panel **AGREED** that SECAS may publish the ICHIS and PPMID information on behalf of industry.

SECP70/03: SECAS may publish the ICHIS and PPMID information on the SEC website on behalf of industry.

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6.   Current Events of Default (RED)

The Panel were provided with an update on:

- One SEC Party who entered into a further Event of Default;

- Two Parties who entered into an Event of Default since the previous SEC Panel meeting, and have subsequently resolved their Default; and

- Three existing Events of Default.

The agenda item was marked as **RED** and therefore recorded in the Confidential Minutes.

SECAS informed the Panel that Ofgem had revoked Sunflower Energy Supply Ltd's supply licence and recommended that they be expelled from the SEC.

The Panel **AGREED** the recommendations for each Event on Default, and **AGREED** to expel Sunflower Energy Supply Ltd from the SEC.

7.   SEC Panel Risk and Issue Register update (GREEN)

The Panel were provided with an update on the SEC Panel Risk Register and the SEC Panel Issues Register, which included a proposed new risk and amendments to one existing risk and its mitigations.

The Panel Chair suggested a review of the SEC Panel Risk Register was required to ensure that all risks are current and relevant.

The Panel **AGREED** the amendments to the Risk Register.

SECP70/04: SECAS and the Panel Chair to undertake a full review of the SEC Panel Risk Register.

8.   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 in September 2019.

The Panel noted that the invitation for nominations would be circulated to all SEC Parties on 22 July 2019 to allow elected members to take their seats by 23 September 2019.

The Panel **NOTED** the update.

9.   Change Status Report – July 2019

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

SECAS (DK) provided an update on SECMP0007 'Firmware updates to IHDs and PPMIDs' noting that it intended to request an Impact Assessment, and provide the Modification Report to the Panel as soon as possible.

There was discussion around the options presented in the Preliminary Assessment; BEIS queried whether option 2B (to exclude In-Home Displays) could be cheaper and quicker to implement. A Panel Member (MW) noted that that option was discounted as it did not address the Devices that were already installed.

The Panel **NOTED** the report.

10.   SEC Modification Timetables

SECAS provided an update to the Panel on the timetables for all Modification Proposals currently in the Refinement Process.

The Panel **AGREED** the programmes of work and timelines proposed.

11.   Updated SEC Release Management Policy

The Panel were presented with an updated version of the SEC Release Management Policy.

The Panel **AGREED** to issue the policy for consultation.

12.   Smart landscape releases plan-on-a-page

The Panel were presented with a draft smart landscape releases plan-on-a-page; it was noted the aim of the document is to encompass all critical information on changes to the SEC on one page, to allow Parties to see how multiple changes interact. The Panel were requested to provide their initial comments on the draft plan-on-a-page.

A Member (AP) noted that the plan was useful and provided a clearer picture around releases, and suggested adding more to the plan, such as milestones prior to the implementation of each phase and testing requirements. It was noted that Panel Members could send their suggestions of what they would like to see on the plan to SECAS.

The Panel **AGREED** the layout of the document is suitable to clearly present the landscape for future changes.

13.   SEC Document Management

SECAS informed the Panel that it had identified several areas where improvements could be made to the SEC document management approach as outlined in the SEC. SECAS highlighted these areas and requested the Panel to agree the next steps.

The Panel **AGREED** that SECAS may produce a work plan that sets out a planned approach to deliver the improvements, which will be brought back to the Panel

14.   BEIS Update

BEIS (RT) provided the Panel with an update on recent publications, forthcoming consultations and key milestones.

The Chair queried whether there is a list of changes that BEIS will be introducing to the DCC Systems and when they may be occurring. BEIS confirmed that all changes they are aware of have been included in the plan-on-a-page that was presented under agenda item 12.

The Panel **NOTED** the update.

15.   DCC Update

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

Operational update

The Panel were informed that no Major Incidents had occurred in June 2019. An update was also provided on open and forthcoming consultations, in addition to upcoming DCC events.

SMETS1

The DCC presented the Panel with an Initial Operating Capability (IOC) Critical Path; a Member (KL) queried whether all Suppliers who have meters within the pilot have been contacted. DCC confirmed that they have and that they have been working closely with five Suppliers. There was discussion around whether the Suppliers would fully migrate once the pilot is complete; the DCC noted that that is not the preferred position. A Member (AP) suggested using Production Proving function as an alternative route, however the DCC noted that Production Proving could be an option further down the line, however it will not be in place by August and therefore does not support IOC.

A Member (AP) noted that Device and User System Testing (DUST) was not included in the plan and queried when it will be open for Itron meters, noting that DUST is theoretically open but only useable when assets are available.

The Panel Chair clarified that the Panel will be reviewing and recommending the Live Services Criteria for the initial entry onto the Eligible Product Combination List (EPCL) for SMETS1, which would be around 4000 dormant Itron meters, at the additional Panel meeting scheduled for 19 July 2019.

The Panel Chair queried the future arrangements and governance following this initial EPCL, and when IOC will be fully declared. The Chair queried whether the Panel would be required to meet on an ad-hoc basis to review every Device Model Combination Test (DMCT), noting that this would be a significant burden on the Panel and industry. BEIS noted that the risk lies with live migrations and noted that it would be reluctant to make decisions on going live without advice from the TAG and

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OPSG. BEIS noted that there should initially be governance in place for the first few DMCTs that may have impacts on consumers, to avoid undue risks, after which a simpler process may be developed.

Citizens Advice also noted that governance will be crucial for dormant Suppliers, as many of them do not have a lot of experience with migration.

November 2019 Release

The DCC provided the Panel with a November 2019 Release update and a plan on a page.

The DCC noted that delayed TAG approval of the TAD could impact Systems Integration Testing (SIT) completion dates. The DCC noted that the TAG had concerns regarding environment and highlighted that unstable Middle Operating Capability (MOC) and Final Operating Capability (FOC) dates make providing an environment strategy for November difficult.

Release 2

The Panel were presented with a Single Band Communications Hub (SBCH) and a Dual Band Communications Hub (DBCH) plan on a page, which included the RAG status associated with the milestones for each.

The DCC noted more risks for DBCH than SBCH and noted that it is working to address these risks.

A Member (KL) raised an issue regarding alerts, noting that 450 million alerts are currently being received per month. The DCC noted that the issue is on their radar and will provide an update at the August Panel meeting.

The Panel **NOTED** the update.

SECP70/05: DCC to provide an update on the alerts issue at the August Panel meeting.

16. SEC Panel Sub-Committee Report

SECAS provided the Panel with an update on recent activities from all the SEC Panel Sub-Committees, which included the following requests from the Operations Group to the Panel:

- Ask the DCC to urgently host a workshop with its Customers to identify immediate improvements; and
- Urge the DCC to urgently develop a Communications Hub bulk returns process.

The Panel:

- **NOTED** the update;

- **AGREED** to request the DCC to urgently host a workshop with its Customers to identify immediate improvements to the CH return process; and

- **AGREED** to urge the DCC to develop a CH bulk returns process.

17. DCC Reporting

The Panel were informed that the Post Commissioning Information Reports for March, April and 2019 had not been provided due to technical issues at the DCC.

The Panel **NOTED** the observations raised by the Operations Group against the reports currently delegated to them.

18. Operations Report – June 2019

The Panel was presented with the Operations Report for June 2019. The report provided an outline of the activities undertaken by the SECAS team in support of the SEC.

The Panel **NOTED** the report.

19. Smarter Markets Project Update

The Panel were provided with an update on the activities currently being undertaken to support the project.

SECAS (AL) provided an overview of the impacts of the Switching Programmes and Retail Code Consolidation: Proposed changes to licences and industry codes consultation to the Panel and SEC Parties, and recommended the Panel respond to three areas of the consultation by issuing a letter to Ofgem.

The first area the Panel discussed was REC governance. It was noted that whilst there were no direct impacts of the REC governance set up, it may be beneficial to highlight that, under the SEC the situation of the DCC inheriting its service provider contracts had become a source of issues when trying to effectively manage them. Therefore, any governance arrangements under the REC should ensure clear accountability and responsibility as a matter of good practice.

The second area related to the implementation approach. SECAS noted the consultation was unclear as to how and when legal text would "go-live" and that any response to Ofgem should request clarity over the dates and implementation approach. The Panel also noted that due to the nature of the changes there could be no parallel running, it had to be 'big bang'.

The third area the Panel reviewed were changes to the licence. SECAS noted the Panel had responded to this area before and believed the Panel should reiterate its views that there should be oversight to ensure the DCC deliver its SEC obligations whilst delivering its role as the Central Registration Service. A Panel Member (KL) noted that the DCC would be running the Service Desk for the Switching Programme, and that assurance should be sought to ensure there is no detriment to the service experienced by SEC Parties.

The Panel Chair noted that the response should reflect the Panel's assumption that consequential changes to the SEC will be administrative, and that there will be no system changes.

It was noted that SECAS would draft a response to the consultation, to include Member's comments, and circulate to the Panel for further comment, prior to being issued to Ofgem in time for the response deadline of 29 July 2019.

The Panel:

- **NOTED** the update;
- **AGREED** to respond to the consultation;
- **AGREED** key areas for inclusion in any response; and
- **NOTED** a draft response will be issued for comment ex-committee.

SECP70/06: SECAS to circulate a draft response to the REC consultation to Panel Members for comment, prior to issuing a letter to Ofgem before 29 July 2019.

20. Transitional Governance Update (GREEN)

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

The Panel **NOTED** the update.

21. Any Other Business

SECAS (HM) presented the Panel with an agenda for the additional Panel meeting scheduled for 19 July 2019, to discuss the Live Services Criteria for SMETS1.

There was no other business and the Chair closed the meeting.

Next Meeting: 9 August 2019