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MP075 ‘Third party metering service providers’

July 2019 Working Group Meeting

Meeting summary

Overview

The Working Group meeting began with SECAS providing an overview of the modification:

- The Issue
 - SEC obligation
 - The SEC places an obligation on the Responsible Supplier of a Smart Metering System to notify and to have arrangements to be notified of security vulnerabilities (Section G ‘Security’);
 - This notification is between the Supplier and the Manufacturer; and
 - The Supplier must also notify the Security Sub-Committee (SSC)
 - Non-domestic supplier relationships
 - In many cases, non-domestic Suppliers may not have a formal contractual agreement with the meter manufacturer or a MAP;
 - Instead, they will have a contract with a Meter Asset Manager (MAM).

Discussions held

SECAS informed the Working Group that SEC Section G3.20 was discussed at the BEIS Independent Supplier Forum the previous week where it was suggested that BEIS was investigating the disadvantage to Suppliers who did not have a contact in place with a MAP or MAM when they acquire a meter.

After a query was raised by the Working Group, SECAS clarified that the intention is that MAPs and or MAMs can communicate directly with Suppliers and the SSC without having to communicate via the Suppliers.

In terms of the legal text, G3.18 states that the Supplier must communicate with the Manufacturer. Amendments are intended to alter this to enable the MAMs or MAPs to communicate directly with the manufacturer to reduce the likelihood of the notifications being lost in the communication trail.

It was noted that the SSC were concerned that the proposed amendment to the SEC could create a level of ambiguity. The SSC’s response suggested that their preferred way forward was not a Modification, as issues may arise within the current trust model. The Proposer went on to clarify that there was no intention to remove the obligation from Suppliers to provide information just make the communications more reliable.

The Proposer also stated that they have encountered issues when writing contracts surrounding the duty to notify, where the MAP or MAM were not willing to notify directly as they believe this is not

possible from their interpretation of the SEC. The proposed legal text would clarify this and enable Suppliers to directly point to tis when discussing these contracts.

Benefits and drawbacks of the Modification

British Gas provided their standpoint at the meeting, stating that they do not feel that this proposal is necessary, as they ensure that their obligations are met whether it is through MAPs or MAMs or themselves. The proposer responded, stipulating that there is no intention to remove obligations regarding security. The Proposer has expressed that their intention is to provide a smoother and more explicit communication of data.

It was discussed that the main issue lies with commercial contracts (which may be addressed by BEIS), which this Modification will not solve.

Next steps

It was agreed that the next steps are to put on hold while investigation takes place into the possible BEIS actions and have discussion with SSC what is acceptable in terms of receiving notifications in case BEIS take no further action.