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Action:	For Discussion

New Draft Proposals and Modification Proposals

1. Purpose

This paper provides a summary of the new Draft Proposals raised and the Draft Proposals that have converted to Modification Proposals in the last month. Copies of the draft or approved problem statements for each proposal are attached to this paper.

We seek any initial comments the Operations Group may have on these proposals at these stages in the framework, and agreement on which proposals it will want to provide further input on as they progress.

2. New Draft Proposals

This section lists the new Draft Proposals submitted in the last month and which have entered the Development Stage. At this point in the process, we are focused on assessing and clarifying the issue identified, the impacts this is having (including the impact of doing nothing), and the context of this issue within the SEC. Solutions will not be discussed until the Change Sub-Committee has agreed the problem statement has been fully defined.

We invite any views from the Operations Group on the issue identified under each proposal, the impacts this may be having, and any areas the Proposer may need to consider further as part of developing their problem statement.

[DP088 'Power to raise modifications'](#)

DP088 has been raised by Simon Trivella of British Gas. The Lead Analyst from SECAS is Jordan Crase.

SEC Section D1.3 allows the following to raise Draft Proposals (which initiate the SEC Modifications Process):

- Parties (including the Data Communications Company (DCC));
- Citizens Advice and Citizens Advice Scotland;
- Anyone specifically designated by the Authority;
- The Authority, but only to ensure compliance with European regulations or following a Significant Code Review (SCR); and

- The Panel in specific circumstances

Currently there are no provisions for SECAS to raise a Draft Proposal. This is the case with several other Codes and is based on Code Administrators not being able to raise changes to the provisions that govern their functions. However, there is precedence for Code Administrators to be able to raise changes. In addition, the DCC, whose functions are also subject to SEC governance, can raise Draft Proposals.

The constraints act as a blocker to the efficient progression of changes. Due to the constraints in Section D1.3(e), the Panel has been unable to raise proposals. Instead, SECAS had to seek a SEC Party to do so on the Panel's behalf. SECAS has also put forward several Draft Proposals to the Panel for endorsement. SECAS has needed to ask for volunteer proposers.

Anticipated Operational Impacts

We do not anticipate any operational impacts from this modification as all subsequent Draft Proposals will be presented to all Sub-Committees once raised.

The draft problem statement containing the information provided by the Proposer can be found in Appendix A.

DP089 'Changes to Appendix R 'Common Testing Scenarios Document''

DP089 was raised by Mari Toda of the DCC. The Lead Analyst from SECAS is Jordan Crase.

Additional User Roles have been added to three Service Request Variants (SRV) through SEC modifications that are to be implemented in the November 2019 SEC Release. These additional User Roles for the three SRVs have not been mandated into Appendix R' Common Test Scenario Document' (CTSD), resulting in additional users not required to perform testing during the User Entry Process Testing (UEPT) or Additive UEPT. This means that the additional users may not perform testing on these SRVs following the November 2019 SEC Release.

There has also been a contradiction identified in the CTSD where it requires the Electricity Distributors (ED) User Role to test an SRV against a SMETS1 Device. However, this SRV is not available to SMETS1 Devices, as defined in Appendix AD 'DCC User Interface Specification'.

Anticipated Operational Impacts

No operational impacts have been identified at this stage; however, the Proposer believes that users will not uptake testing until the new year.

The draft problem statement containing the information provided by the Proposer can be found in Appendix B.

DP090 'Incorporation of Non GBCS Non-Mandated Alerts into the SEC'

DP090 was raised by Emslie Law of SSE. The Lead Analyst from SECAS is Alison Beard.

Many DCC Users only recognise Alerts defined in GB Companion Specification (GBCS). As a result, DCC Users systems have not been designed to recognise Non-GBCS Non-Mandated (NGNM). These Alerts are currently being sent to DCC Users with no contextual information and no means to disable them. To monitor and manually define these Alerts is an inefficient working practice,

especially if the DCC User deems the Alert unnecessary. This will continue until the NGNM Alerts are migrated into the SEC.

Anticipated Operational Impacts

We do not foresee any operational impacts as this modification will allow users to configure these alerts.

The draft problem statement containing the information provided by the Proposer can be found in Appendix C.

DP091 'Updating Security Assurance Status'

DP091 was raised by Gordon Hextall of the Security Sub-Committee (SSC). The Lead Analyst from SECAS is Adam Lattimore.

Once a Party completes their Full User Security Assessment (FUSA) the SEC Panel assign them one of four assurance statuses. Two of these, "Provisionally Approved" and "Deferred", indicate significant security deficiencies that require substantial remediation, the severity of which are not reflected in the current SEC terminology.

SSC believes that the assurance status set should be clear to Parties and accurately reflect the situation. As such it proposes to amend these assurance status as follows:

- "Provisionally Approved" to "Deferred"; and
- "Deferred" to "Rejected"

Additionally, there is no current provision for the SSC to require a Party to undertake a second FUSA. The SEC only allows for updates to the original User Security Assessment Response. The SSC believes it would be more appropriate that where a Party is set a status of "Rejected" a second FUSA is more appropriate than an updated User Security Assessment Response. A second FUSA would provide assurance for all Parties, and the DCC, that the (significant) deficiencies have been addressed.

Anticipated Operational Impacts

Users may be requested to participate in a second FUSA but we do not see this having an impact operationally.

The draft problem statement containing the information provided by the Proposer can be found in Appendix D.

DP092 'New Planned Maintenance Methodology'

DP092 was raised by Chris Thompson of the DCC. The Lead Analyst is Adam Lattimore.

In April 2019 the DCC began a trial of a new approach regarding the delivery of Planned Maintenance. The new approach sought to categorise planned changes as either low or high impact,

based upon a risk-based methodology. It also amended the timings with which Planned Maintenance was scheduled and implemented.

Whilst the SEC is silent on the methodology for scoping Planned Maintenance, it does set out when the Maintenance should occur and the timescales around publishing Maintenance schedules (Sections H8.3 and H8.4). In order to trial the new approach, the SEC Panel granted the DCC a derogation against these provisions for six months (later extending for a further three months until February 2020). The Panel requested the DCC report on progress to the Operations Group. In July, the DCC reported the trial had been a success and, following a final report to the Operations Group, intended to raise a Modification Proposal to formalise the new approach.

Anticipated Operational Impacts

The DCC plan to present to the Operations Group at the November meeting to discuss the operational impacts and the outcomes of the trialled new approach.

The draft problem statement containing the information provided by the Proposer can be found in Appendix E.

DP093 'Implementing IRP511 and CRP535 to support GBCS v3.2 devices'

DP093 was raised by Chun Chen of the DCC. The Lead Analyst from SECAS is Adam Lattimore.

In July 2019 BEIS designated an uplift of the GBCS to version 3.2 as part of the November 2019 SEC Release.

In order to fully deliver the functionality of two resolution proposals included in GBCS v3.2 (IRP511 'Set Clock Alerts Refs in Alert Tables Incorrect' and CRP535 'Restoring Removed Devices from the HAN'), consequential changes are required to the DCC User Interface Specification (DUIS) and Message Mapping Catalogue (MMC) schemas.

The amendments to the schemas had been intentionally left out of the November 2019 SEC Release in order to reduce any potential impact on testing for the SMETS1 Initial Operating Capacity (IOC).

Anticipated Operational Impacts

We do not anticipate any operational impacts at this moment in time.

The draft problem statement containing the information provided by the Proposer can be found in Appendix F.

3. Recommendations

The Operations Group is requested to **DISCUSS** the proposals in this paper and provide any views or comments offline to the Change Team email address sec.change@gemserv.com.

Bradley Baker

SECAS Team

29 October 2019

Attachments:

- **Appendix A:** DP088 draft problem statement
- **Appendix B:** DP089 draft problem statement
- **Appendix C:** DP090 draft problem statement
- **Appendix D:** DP091 draft problem statement
- **Appendix E:** DP092 draft problem statement
- **Appendix F:** DP093 draft problem statement