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SEC Change Sub-Committee Meeting 12_2502

25 February 2020, 10:00 – 11:20

Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	Change Sub-Committee Members
Change Sub-Committee Chair	Alison Beard
Large Suppliers	Paul Saker (<i>teleconference</i>)
	Simon Trivella (<i>teleconference</i>)
Small Suppliers	Andrew Margan (<i>teleconference</i>)
	Chris Brown (<i>teleconference</i>)
Electricity Network Parties	Gemma Slaney (<i>teleconference</i>)

Representing	Other Participants
DCC	Remi Oluwabamise (<i>teleconference</i>)
	Mari Toda
	Sasha Townsend (<i>teleconference</i>)
	Gary Fairclough (<i>teleconference</i>)
	Leigh Hill (<i>teleconference</i>)
	Paul Howard (<i>teleconference</i>)
	Del Kang (<i>teleconference</i>)
SECAS	Laura Delargy (<i>Meeting Secretary</i>)

	Bradley Baker
	Joe Hehir
	Harry Jones
	Jordan Crase
	Fiona Chestnutt

Apologies:

Representing	Name
Other SEC Parties	Jonathan Lishawa
	Elias Hanna
Consumers	Ed Rees

1. Welcome and introductions

The Chair welcomed Members to the Change Sub-Committee (CSC) meeting.

2. Actions Outstanding

Action Reference	Action
ACTION CSC 10/01	DCC to provide the CSC with draft legal text for their proposed solution, and a breakdown of the previous cost analysis for amending the DCC Systems with detail behind the cost for DP096.
<p>An update was provided under the DP096 update of Agenda Item 2. The DCC provided some further information which SECAS had included in the Modification Report, however GS stated that this information was not correct. The Chair suggested a meeting should be arranged to ensure this action can be addressed.</p> <p>Status: Open</p>	
ACTION CSC 11/01	The DCC to provide SECAS with information on any IRPs currently in scope of DP098 that may impact on DCC Systems.

Action Reference	Action
	The DCC has confirmed that no IRPs included in DP098 impact DCC Systems. Status: Closed
ACTION CSC 11/02	SECAS to clarify in the Modification Report the justification for amending the SEC to align with DCC processes in the Modification Proposal for DP110.
	An update was provided under the DP110. This has been done and can be closed. Status: Closed

3. Draft Proposal Report

Recommended for conversion:

DP095 'Alignment of SEC Credit Cover'

The CSC considered the problem statement for [DP095 'Alignment of Credit Cover'](#) which seeks to explore the current credit cover requirements. This DP looks to identify if there are ways it can be amended to reduce the risk of cost socialisation across the industry. DP095 was raised by EDF Energy.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should proceed to the Refinement Process.

DP096 'DNO Power Outage Alerts'

The CSC considered the problem statement for [DP096 'DNO Power Outage Alerts'](#) which seeks to address a SEC Obligation which the DCC is unable to meet. In the case of a power outage lasting more than three minutes, the DCC is obliged under the SEC to provide Power Outage Alerts (POAs) to Distribution Network Operators (DNOs) within a given timeframe.

The SEC states that the timeframe POAs must be set within is 60 seconds after the initial three minutes of the outage to allow time for power to be potentially restored automatically. Once power has been restored, a Power Restoration Alert (PRA) is sent to the DNO. This must also be sent within 60 seconds.

One CSC member (GS) requested clarity regarding the governance around SEC parties incurring costs when the DCC are non-compliant requesting that this aspect should be addressed formally

before DP096 enters the Refinement Process. She was concerned that moving into refinement without clarification on cost implications could result in Parties paying.

A CSC member (PS) acknowledged the concern of the DNO's however he was satisfied that further clarity on governance would be addressed within the Refinement Process. A DCC member (RI) stated that it was not possible to request for legal text to be provided at this stage in the process as the DCC would need a view on current performances or how much work is required on the current systems.

A DCC member (RI) stated Service Providers would need to assess the change before costs could be estimated, and that DP096 should be allowed to follow the normal SEC process and move forward to the next phase in order to address the concerns. The DNO member (GS) is expecting DCC to confirm their current system capability before the modification can then progress to look into solutions and costs' The Chair (AB) referenced the table within DP096, which highlighted the DCC's current level of service. GS stated that it was not a correct measurement of the alert timescales, and that DNO's are just looking to understand current capabilities. A DCC member (RI) noted that the DCC would be happy provide the information.

A CSC member (GS) requested for an action to be raised, which would identify both the impacts and costs on DNOs, and show what the DCC would be providing, prior to progressing DP096 further. A DCC member noted that the DCC fully intends to meet the requirements but that the clarifications sought by DNO's could only be justified when going through the Preliminary Assessment process. A CSC member requested that the DCC's capabilities be presented to DNO's, so they can either amend the SEC accordingly or, if not considered to be good enough, then decide on what changes can be made. GS expressed frustration that DNOs had advised DCC that before the SEC Modification was raised, they needed to clarify and confirm current system capabilities so that it would go through the process smoothly, however this hasn't been done.

CSC 12/01: SECAS to arrange a meeting with DCC and DNO representatives to discuss plans and capabilities for DP096.

The CSC **AGREED** further development is required to define and understand the issue.

DP109 'ADT and Exit Quarantine file delivery mechanism'

The CSC considered Draft Proposal [DP109 'ADT and Exit Quarantine file delivery mechanism'](#) which seeks to require that the Anomaly Detection Threshold (ADT) File and Exit Quarantine files be provided to the DCC via the SSI as a more secure method than by email. The ability to share the files via email would still be retained as a back-up.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should proceed to the Refinement Process.

DP112 'Setting the Privacy Assessment Assurance Status'

The CSC discussed draft proposal [DP112 'Setting the Privacy Assessment Assurance Status'](#) which seeks to require each SEC Party to complete a Full Privacy Assessment (FPA) so that the Smart Energy Code (SEC) Panel can assign the Party with one of the four assurance statuses. It has been identified that two of these statuses are not entirely clear, and so a change to a more accurate status title has been requested.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should proceed to the Refinement Process.

DP113 'Unintended Data Disclosure when using SR8.2'

The CSC was provided with a verbal update on [DP113 'Unintended Data Disclosure when using SR8.2'](#) which is set out to modify a behaviour of the current design of the DCC System, which has been discovered to cause a potential breach in GDPR. If a DCC Service User submits a query to the DCC System with a house name and postcode, but without a unique reference, the results may return data of an unintended property at a matching postcode. The DCC could return data that could include unintended personal data, which would be a breach of GDPR, and the System should be changed to prevent this.

PS suggested looking at the API and ECOES approach to these issues.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should proceed to the Refinement Process.

DP114 'Alt HAN P2P Charging Data'

The CSC considered Draft Proposal [DP114 'Alt HAN P2P Charging Data'](#) which seeks to change the way that Alternative Home Area Networks Company (Alt HAN Co) are obligated to submit nine data

items to the Data Communications Company (DCC) each year. Some of these data items aren't wholly obtainable and therefore the DCC can't accurately complete the calculation resulting in DCC recovering charges from Supplier Parties that do not match to the costs they incur. With the current text in SEC Section Z, the DCC will continue to inaccurately charge Supplier Parties.

The CSC members were satisfied with DP114 and recommended it for conversion to a Modification Proposal and proceed straight to Report Phase with a targeted implementation date of the June 2020 SEC release.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should go straight to Report Phase.

DP115 'Changes to the NCSC Good Practice Guides'

The CSC discussed Draft Proposal [DP115 'Changes to the NCSC Good Practice Guides'](#) which seeks to correct the SMKI Document Set which contains several references to Good Practice Guides (GPGs) that have been discontinued and will not be replaced. The SMKI PMA wishes to address this by aligning the Smart Energy Code (SEC) with these changes and by making available authorised replacement SMKI PMA guidance.

The CSC were happy to send DP115 to the report phase in order for it to make the earliest available SEC release.

The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should go straight to Report Phase.

Continuing in development:

DP094 'Supporting prepayment customers in no SM WAN scenarios'

The CSC was provided with a verbal update on [DP094 'Supporting prepayment customers in no SM WAN scenarios'](#) which seeks a solution to be able to effectively manage Smart Metering Equipment Technical Specifications (SMETS) 2 prepayment customers in no Wide Area Network (WAN), intermittent WAN or Data Communication Company (DCC) outage scenario.

DP094 was raised by Utilita who believe the issue affects 9% of its customers. However, one Large Supplier typically sees that 3% of Home Area Network (HAN)/WAN connectivity issues.

The Proposer is yet to provide a breakdown of the estimated size of the problem. SECAS proposes to issue a Request for Information (RFI) to SEC Parties to establish the impact of intermittent or no WAN.

One CSC member (PS) thought that looking at no WAN scenarios across all SMETS2 meters would be a better approach than just prepayment meters as where there is no WAN Suppliers may not install a prepayment meter.

SECAS stated that it is currently preparing the RFI prior to the CSC decision stage. One CSC member (PS) had the view that if DP094 was to be held up, that it would be time wasted and that once the RFI was received, that it would be able to show the full scale of the issue.

The CSC **AGREED** further development is required to define and understand the issue.

DP100 'Service Response Traffic Management'

The CSC was provided with a progress update on [DP100 'Service Response Traffic Management'](#) which seeks to manage scenarios where the DCC Systems have suffered an outage or restriction and are then restored. In these scenarios Service Responses will be queued while the DCC Systems are restricted and then be sent to the Users when DCC Systems come back online. Users' adapter systems will receive all of these Service Response messages at once, irrespective of priority.

SECAS updated the CSC that DP100 was being discussed with the TABASC in order to get as much industry input as possible.

The CSC **AGREED** further development is required to define and understand the issue.

DP107 'SMETS1 Validation of SRV 6.15.1'

The CSC considered Draft Proposal [DP107 'SMETS1 Validation of SRV 6.15.1'](#). To send a Critical Command to a SMETS1 Device, the User must be the owner of the relevant certificate on the Device and the owner of the Device in the RDP data. If a Network Operator updates the Network Operator Certificate with another in error, this error cannot be corrected.

One CSC member (GS) stated that as the proposer of DP107, that the draft proposal may not be worth continuing with, but that it would need to at least progress to the refinement stage in order to work out cost benefit analysis.

One DCC member (RI) referenced an action on SECAS to have a conversation with Penny Brown or Robin Seaby and asked whether this had taken place. A CSC member (GS) stated that it wasn't an action but more of a conversation with Penny and Robin, as Robin understands what the problem is. GS advised that if the cost is too large, then refinement should identify that. A CSC member (PS) agreed with DP107 regarding cost. One CSC member (GS) suggested that as there is no charge associated with raising a PA, that there was an urge to get it done, so that figures could be gathered,

and costs could be reviewed. It would also allow DNO's to manage their situation as it is hard to get a clear view until a PA is done. One CSC member (GS) stated that a PA should be requested before the Working Group meeting. The CSC:

- **AGREED** the Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMENDED** to the Panel that the Modification Proposal should proceed to the Refinement Process.

DP108 'SSI Job Type Role for SRO/ARO'

The CSC considered new Draft Proposal [DP108 'SSI Job Type Role for SRO/ARO'](#).

There are several procedures that only Senior Responsible Officers (SROs), or Authorised Responsible Officer (AROs) are empowered to undertake with or request of the DCC. However, the Self-Service Interface (SSI) currently has no restrictions available to limit access to these processes/requests to SROs and AROs only. For example, submitting Anomaly Detection Threshold (ADT) forecast data.

SECAS advised that at January's CSC meeting, SMKI asked for clarification on what the DCC are trying to mitigate and to look at some of its User cases and functionality, however all of the questions are still unanswered by the DCC and therefore this DP will remain in development.

The CSC **AGREED** further development is required to define and understand the issue.

DP111 'SMDA Budget Amendments'

The CSC considered Draft Proposal [DP111 'SMDA Budget Amendments'](#) which seeks to review the Smart Meter Device Assurance (SMDA) funding model to ensure that the SMDA can provide long-term test assurance. It was noted that there is a risk that the SMDA would not be able to continue in its current format.

A CSC member asked if the budget for DP111 was going forward to SEC. SECAS responded that it was still in progress but not at the decision stage yet.

The CSC **AGREED** further development is required to define and understand the issue.

DP116 'Service Request Forecasting'

The CSC discussed new Draft Proposal [DP116 'Service Request Forecasting'](#) where currently, for each quarter of the year, DCC Users must submit to the DCC an eight-month forecast of the number of Service Requests that the User anticipates sending. It is believed that each forecast takes an average of two days for each User to complete. The DCC has raised concern that the accuracy of the

forecasts does not meet the level required to produce useful data that will improve the management of demand on the DCC User Interface Services.

CSC members were happy that DP116 was in progress and that it has been long awaited.

SECAS confirmed that DP116 would be discussed at the sub-committees and would be brought back to CSC in March 2020.

The CSC **AGREED** further development is required to define and understand the issue.

DP117 'Bulk CH returns'

The CSC discussed new Draft Proposal [DP117 'Bulk CH returns'](#) where DCC Users must send an individual Service Request to notify the DCC of each Communications Hub return. This takes a significant amount of time and effort when multiple CHs require return. DCC Users have stated that this is not a sustainable approach in dealing with returns.

SECAS updated the CSC that DP117 would be staying in development and brought back to CSC in March. CSC members were invited to provide comments.

The CSC **AGREED** further development is required to define and understand the issue.

Code works update

SECAS (FC) provided the CSC with a brief update on Codeworks, stating that 50% of CSC members were not yet system users. SECAS invited all CSC members to request their own access via email and in return, a Username and Password would be sent to each member.

SECAS informed the CSC that the 2020 Annual Customer Survey would be circulated via an external company and be emailed to each member for completion. CSC members were invited to email their consent to take part to Fiona Chesnutt, stating their name and email so SECAS could forward on their details and a link to the survey would be sent.

4. Any Other Business (AOB)

A CSC member (GS) noted that there was information missing from the [SECMP0025 Electricity Network Party Access to Load Switching Information](#) service request matrix table and asked how to get a request submitted and corrected in time for the November 2020 release. SECAS explained that the error was in the original legal text and suggested that CSC members could progress the change request via a separate fast-tracked modification to target the implementation date for November 2020.

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

Next Meeting: 31 March 2020.