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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 been converted to Modification Proposals in the last month. Copies of the draft Modification Reports for each proposal are linked to this paper.

We seek any initial comments the Technical Architecture and Business Architecture Sub-Committee (TABASC) 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 impact that this is having (including the impact of doing nothing) and the context of this issue within the Smart Energy Code (SEC). Solutions will not be discussed until the Change Sub-Committee (CSC) has agreed the problem statement has been fully defined.

We invite any views from the TABASC on the issue identified under each proposal, the impacts this may be having and any areas the Proposer may need to consider further. If you require any additional information on a Draft Proposal, the Modification Reports of each Draft Proposal can be found in the attachments to this paper or on the respective proposal's webpages via their hyperlinks.

DP125 'Correcting the ESME variant'

DP125 has been raised by John Noad of Npower. The Lead Analyst from SECAS is Eessa Mansoor.

A gaining Supplier is unable to update the 'ESMEVariant' field of a commissioned Electricity Smart Metering Equipment (ESME) after SR 12.2 had been executed incorrectly by the previous installing Supplier.

DP126 'Smart meter consumer data access and control'

DP126 has been raised by Ed Rees of Citizens Advice. The Lead Analyst from SECAS is Emmanuel Ajayi.

Consumers rely on their Energy Supplier to provide information through the In-Home Display (IHD), which is not an ideal position for consumers to receive impartial advice. Data Communications Company (DCC) Users are required to make privacy and security provisions before they can access consumer's energy data, however, the DCC does not authenticate DCC Users' permissions for each individual data request.

As a result, those other DCC Users' access to consumers energy use data could find issues where data is incorrectly logged or processed, data breaches or consent issues, which leads to consumers issues with privacy and security.

DP127 'SMKI RAPP Security Screening clarification'

DP127 has been raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC). The Lead Analyst from SECAS is Joe Hehir.

The SSC has confirmed that the obligations in SEC Section G 'Security' G4.2 and G4.3 apply to Authorised Responsible Officers (AROs) and that AROs should be subject to security screening to British Standard (BS) 7858:2019 or equivalent.

However, this obligation isn't made explicit in the Appendix D 'SMKI Registration Authority Policies and Procedures' (SMKI RAPP) which is followed by Users and the DCC Registration Authority in processing applications for the appointment of AROs. Failure to comply with the obligation in Section G4.3 will result in a non-compliance being raised during a User Security Assessment.

DP128 'Gas Network Operators SMKI Requirements'

DP128 has been raised by Earl Richards of Cadent Gas. The Lead Analyst from SECAS is Emmanuel Ajayi.

Gas Network Operators are required by the SEC to place their SMKI Organisation Certificates in the SMKI Repository and to undertake SMKI & Repository Entry Process Tests (SREPT). The Proposer believes this is a very expensive process if the Gas Network Party does not have the infrastructure to create and maintain the SMKI Keys and to complete SREPT.

They also consider this obligation provides no benefit to Gas Network Operators since they do not receive alerts. Consequently, the Proposer feels that Gas Network Party have no current benefit in becoming DCC users.

DP129 'Allowing the use of CNSA variant for ECDSA'

DP129 has been raised by David Rollason of the DCC. The Lead Analyst from SECAS is Joe Hehir.

The Data Services Provider (DSP) considers itself to be a Remote Party in the context of SEC Schedule 8 'GB Companion Specification' (GBCS) Section 4.3.3.2. It therefore interpreted the GBCS as mandating the GCBS variant of Elliptic Curve Digital Signature Algorithm (ECDSA) for all device critical command signing operations, rather than the more common Commercial National Security Algorithm (CNSA) Suite variant, which is approved by the National Institute of Standards and Technology (NIST).

The Department for Business, Energy and Industrial Strategy (BEIS) advised that the DSP could have used the CNSA variant and remained compliant. The Smart Metering Key Infrastructure Policy

Management Authority (SMKI PMA) also agreed that the above GBCS wording lacked clarity and would need to be updated to explicitly permit the use of CNSA by Remote Parties.

MP130 'CH order and delivery changes due to COVID-19'

MP130 was raised by Sasha Townsend of the DCC. The Lead Analyst from SECAS is Ali Beard.

The current UK Government social distancing guidance issued to help reduce the spread of the coronavirus (COVID-19) means only essential Communications Hub installations are taking place. There is currently no definitive end date to this guidance.

The manufacturers of Communications Hubs are not UK-based and therefore are not subject to the same social distancing guidance. They are continuing to manufacture Communications Hubs and the DCC's Service Providers are contractually obliged to receive them. Under the SEC, Suppliers are obliged to receive the deliveries they ordered.

This has resulted in large numbers of Communications Hubs being held by Suppliers. Scheduled deliveries that are required under the SEC to continue mean Suppliers now face the challenge of reduced warehouse capacity and the need to minimise the unnecessary movement of Communications Hub stock.

DP131 'Default maximum demand configuration conflict'

DP131 has been raised by Chun Chen of the DCC. The Lead Analyst from SECAS is Bradley Baker.

According to SMETS, GBCS use case definition, DUIS and MMC, values of week definition and date range cannot be configured, for example only the time of day can be configured via defined use case.

The Companion Specification for Energy Metering (COSEM) template (attached in GBCS Section 18.2 (use case ECS37)) also shows the date configuration for the maximum demand as below:

Maximum demand monitoring is daily in between configured time of day for its whole life.

1. Value of week day is 0xFE

2. Value of begin date is 0x000001FFFF

3. Value of end date of 0xFFFFFFFFFF

This means that as result of SECMP0018's implementation, GBCS Table 28d is in conflict with ENA-required default configuration and SMETS, GBCS use case, DUIS and MMC. It is proposed that a correction is made to GBCS v3.2 Table 28d to align with ENA-required default configuration.

DP132 'DLMS references in GBCS'

DP132 has been raised by Tony Pile of Landis+Gyr. The Lead Analyst from SECAS is Emmanuel Ajayi.

The DLMS have issued a new version of the DLMS Green and Blue Books which are referenced in the SEC, notably in GBCS. GBCS references Green Book (DLMS UA 1000-2 Ed. 8) and Blue Book (DLMS UA 1000-1 Ed. 12.0), whereas DLMS are now onto Ed.9 and Ed.13 respectively.

All instances of DLMS throughout SEC are therefore referring to the older version of the Books. These versions of the DLMS are also identified in GBCS DLMS Green and Blue Books. This

document aligns with the published versions of the Green Book (DLMS UA 1000-2 Ed. 8) and Blue Book (DLMS UA 1000-1 Ed. 12.0).

DP133 'Consequential changes to SEC Section G'

DP133 has been raised by Simon Crouch of Utiligroup. The Lead Analyst from SECAS is Harry Jones.

Currently in the Smart Energy Code (SEC) Section G, G1.7 lists exclusions for Export Suppliers and Registered Supplier Agents (RSAs). There it states if you are a User who acts in either of those two User Roles, then SEC Section G's obligations don't apply except for the ones listed under G1.7.

The "Shared Resources" section isn't currently listed under G1.7, which means Export Suppliers and RSAs can ignore those obligations whilst not being in breach of the SEC.

3. Updates to Existing Proposals

There are no updates to existing modification proposals to deliver this month. Any updates that arise between now and the scheduled TABASC meeting will be delivered as a verbal update.

4. Recommendations

The TABASC is requested to:

- **DISCUSS** the proposals in this paper; and
- **PROVIDE** any views or comments.

Harry Jones

SECAS Team

28 May 2020