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SEC Change Sub-Committee Meeting 15_2605

26 May 2020, 10:00 – 11:10

Teleconference

SECCSC_15_2605 - Draft Minutes

DRAFT

Attendees:

Category	Change Sub-Committee Members
Change Sub-Committee Chair	Alison Beard (AB)
Large Suppliers	Paul Saker (PS)
	Simon Trivella (ST)
Small Suppliers	Chris Brown (CB)
Electricity Network Party	Gemma Slaney (GS)

Representing	Other Participants
DCC	Remi Oluwabamise (RO)
	Paul Howard (PH)
SECAS	Holly Burton (HB)
	David Kemp (DK)
	Joe Hehir (JH)
	Bradley Baker (BB)
	Harry Jones (HJ)
	Manny Ajayi (MA)
	Eessa Mansoor (EM)
Proposer for DP094	Andy Knowles (AK)

Apologies:

Representing	Name
DCC	Mari Toda (MT)
Other SEC Parties	Elias Hanna

1. Welcome and Introductions & Approval of Previous Meeting Minutes

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

The Chair confirmed no comments were received on the minutes from the previous CSC meeting, held on Tuesday 28 April 2020. The CSC **APPROVED** the minutes as written.

2. Draft Proposal Report

Recommended for conversion:

DP094 'Supporting prepayment customers in no SM WAN scenarios'

The CSC considered the problem statement for DP094 'Supporting prepayment customers in no SM WAN scenarios'.

A Request For Information (RFI) was issued in April to seek Parties' experience with WAN coverage and how this affected SMETS2 installations. Six responses were received and feedback was varied.

SECAS (JH) advised that two Parties noted the lack of WAN coverage for between 2% - 3% of attempted installations, and that the successful installation subsequent WAN issues are not a significant issue. Comments were also received from a Small Supplier which noted 12% of Electricity Smart Meters and 36% of Gas Smart Meters experience a lack of WAN.

Another Large Supplier confirmed experience in the loss of communications to its pre-payment Meters at a rate of roughly 8%. However, these are not always due to no WAN but could be caused by Home Area Network (HAN) failures. This currently does not schedule pre-payment Meter installations where the DCC coverage checker confirms there is no WAN. Amongst this, the DCC advised it resolves 97.5% of all WAN issues raised.

In relation to WAN resolution timescales, the DCC noted within the RFI that 86% of PPMID WAN issues are resolved within the SLA noticing that these are Category 3 which have a 72-hour SLA. Five respondents did not provide figures for the resolution timescales, however, one Large Supplier confirmed WAN incidents are only raised when there is an issue after a successful installation which is roughly 0.07%. As part of this, the DCC usually respond within 48 hours and when a WAN incident is raised, 90% of cases require a site visit.

Industry commented that a consideration should be the loss of connectivity due to an Over The Air (OTA) firmware update, and also with regard to Communications Hubs, defects where Meters are dropping off the HAN.

Further comments received from Large Suppliers highlighted the RFI had been held at customer forums, with discussions being held at length with the DCC and Parties to focus on how to mitigate and manage no WAN scenarios. A Large Supplier acknowledged the Proposer is disproportionality impacted due to the impact of WAN, but any solution must be cost effective.

CSC member (CB) recognized comments from Large Suppliers but stressed the importance of progressing this proposal as there is a risk of losing consumer confidence. The member noted the impact this issue has on consumers, such as not being able to top-up pre-payment meters with no-WAN. They added that their organisation does not even supply pre-payment customers, but it still experiences WAN issues.

The Consumer Representative agreed with the previous member's comments and believed that more could be done to assess the scale of the issue.

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PS echoed the idea to explore cost effective ways within the Working Group to resolve issues raised against WAN.

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.

DP124 'Consequential changes to DUIS and MMC'

The CSC considered the problem statement for DP124 'Consequential changes to DUIS and MMC'.

This modification consists of consequential changes arising from two modifications already approved. These parts of the legal text were not available when the modifications were approved. This is because the detailed design of the solutions was finalised following approval of the change. The two affected modifications are SECMP0062 'Northbound Application Traffic Management – Alert Storm Protection' and MP093 'Implementing IRP511 and CRP535 to support GBCS v3.2 devices'.

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 Report Phase.

DP127 'SMKI RAPP Security Screening clarification'

The CSC considered the problem statement for DP127 'SMKI RAPP Security Screening clarification'.

The Security Sub-Committee (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 Data Communications Company (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.

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 Report Phase.

DP125 'Correcting the ESME variant'

The CSC was provided with a verbal update on DP125 'Correcting the ESME variant'.

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

CSC member (GS) noted there was a potential issue and questioned how many incorrect ESMEs are in the inventory. The problem seemed clear however, there is a lack of clarity regarding a possible solution. CSC member (PS) confirmed the whilst the current volume is low, this could become an increasing problem. As such, members agreed that it would be beneficial for the Draft Proposal to proceed to the Refinement Process.

CSC member (PS) highlighted the importance of considering other data Smart Meter Inventory (SMIs) MIs and what impact it could have on functionality. GS requested that the Working Group review what other information can be corrected by the Supplier other than Device installs.

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.

DP128 'Gas Network Operators SMKI Requirements'

The CSC was provided with a progress update on DP128 'Gas Network Operators SMKI Requirements'.

The CSC Chair (AB) noted the impact this modification would have on Suppliers would be further defined in the Refinement Process. Members agreed they were happy for this to be converted to a Modification Proposal but should address the complications for Suppliers during refinement.

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.

DP129 'Allowing the use of CNSA variant for ECDSA'

The CSC was provided with a progress update on DP129 'Allowing the use of CNSA variant for ECDSA'.

CSC member (GS) initially noted that industry should understand the issue and remain cautious when making changes to the DSP as there are current issues regarding duplicate IDs and messages. SECAS (JH) noted the SEC explicitly permits the use of Elliptic Curve Digital Signature Algorithm (ECDSA) which is a variant of digital signing ID. The DCC has said that this is a bespoke approach and in practice, what most Parties use is the Commercial National Security Algorithm (CNSA) variant which is easier to use. However, the issue is that the SEC currently does not state whether Parties can or cannot use this.

SECAS (JH) advised that DCC System changes would be needed if the Data Services Provider (DSP) was to switch from the ECDSA variant to the CNSA variant.

The CSC Chair (AB) advised a substantial amount of work has been undertaken since the agenda was circulated to members in that, the issue is now clear but to remain vigilant of upcoming changes throughout the Modification process. As such, it was agreed this could be discussed during the Refinement Process.

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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.

Continuing in development:

DP126 'Smart meter consumer data access and control'

The CSC was provided with a progress update on DP126 'Smart meter consumer data access and control'.

CSC member (ER) confirmed further clarification within the modification is required to understand what access is being requested. The first issue notes consumers cannot access all information being transmitted to the DCC. The second issue is that consumers find it difficult to review how the data is shared by the DCC, there is currently no easy mechanism. The options for this are to speak to the company who is suspected of a data breach, or the consumer can contact the ICO. The other option looks at subject access requests to the Data Controller, the Supplier will then liaise with the DCC to understand how the data might have been shared. It was noted that currently the consumer cannot control how their energy data is processed or alter the data sharing settings.

CSC member (CB) understood the objective of this modification but questioned whether gaining access to the data was driven by consumers. It was also questioned whether there was an intention to re-write GDPR in order to provide data consent. ER clarified there has not been a high demand for consumers to request energy data, this is merely focused on future smart tariffs and half hourly settlements. GDPR will not be re-written but instead will provide data portability which is a current commitment.

CSC member (ST) clarified further work needs to be undertaken to understand what is currently in place. Suppliers have an obligation to provide customer data in an online or readable format, by doing so customers can then access their data. In terms of data preferences, all Suppliers have obligations to ensure the customer is aware of the data preferences and what information the Supplier can accumulate. Furthermore, customers can request Suppliers to provide information on data that has been processed.

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

New Draft Proposals:

Three new DPs have been raised in the last week:

DP131 'Default maximum demand configuration conflict'

DP131 'Default maximum demand configuration conflict' was raised by Chun Chen of the DCC. 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.

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1. Value of weekday 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.

CSC members advised that due to the reports only being circulated before this meeting, more time is required to review and provide comments offline.

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

DP132 'DLMS references in GBCS'

DP132 'DLMS references in GBCS' was raised by Tony Pile from Landis + Gyr.

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.

It was noted that this modification would ideally be implemented in the November 2020 SEC Release therefore, an update will be circulated to CSC members before the next meeting in June 2020 to seek views and hold a potential interim CSC offline.

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

DP133 'Consequential changes to SEC Section G'

DP133 'Consequential changes to SEC Section G' was raised by Simon Crouch from Utiligroup.

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.

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

Other Draft Proposal Updates:

DP096 'DNO Power Outage Alerts'

The CSC was provided with a progress update on DP096 'DNO Power Outage Alerts'. It was noted that Service Providers are currently working on costings to support the technical paper and are looking to deliver current performance figures in August 2020. The Proposer of this modification is providing regular updates as the project progresses.

The CSC **NOTED** the update.

DP108 'SSI Job Type Role for SRO/ARO'

The CSC was provided with a progress update on 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, Anomaly Detection Threshold forecast submissions.

The Proposer has not provided any further information on comments raised therefore an update will be provided at a future CSC meeting.

CSC member (PS) questioned the timelines of this modification in that, the Proposer is still yet to provide an update. Although the questions being raised are specifically focused on what the DCC are trying to fix however, there needs to be more clarity around the solution of the fix. CSC members requested that SECAS to invite the Proposer to the next CSC meeting in June 2020 to confirm what options are available for this modification.

CSC 15/01: SECAS to invite the Proposer of DP108 'SSI Job Type Role for SRO/ARO' to the next CSC meeting on 30 June 2020 to further understand the issue and confirm options moving forward.

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

DP111 'SMDA Budget Amendments'

The CSC was provided with a progress update on DP111 'SMDA Budget Amendments'.

Following the National Audit Office's (NAO) 23 November 2018 report "Rolling Out Smart Meters", the Government Department of Business, Energy and Industrial Strategy (BEIS) commissioned an independent review into device interoperability on Change of Supplier (CoS). The report was published in October 2019, with one of the recommendations being that "Energy suppliers and the Smart Metering Device Assurance (SMDA) Board should review the SMDA funding model to ensure SMDA can provide long-term test assurance". Following this recommendation, amendments should be suggested to the SMDA funding model.

Consultation for this modification closed on Friday 22 May 2020, responses are currently being collated with SMDA and will be circulated in due course.

The CSC **NOTED** the update.

3. Any Other Business (AOB)

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

Next Meeting: 30 June 2020.

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