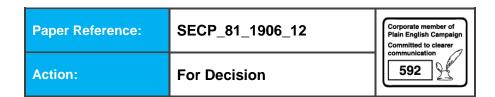


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Change Status Report – June 2020

1. Purpose

This document is the Change Status Report, which provides information on the progress of Smart Energy Code (SEC) Modifications and Releases.

The Data Communications Company (DCC)'s progress report on Preliminary Assessments and Impact Assessments is included as Appendix A to this report.

2. Recommendations

The Panel is requested to NOTE the contents of this report.

Holly Burton

SECAS Team

12 June 2020

Attachments:

• Appendix A: DCC Preliminary Assessments and Impact Assessments update





1. Summary

This report provides a monthly update on the status and progress of SEC Draft Proposals, Modification Proposals and Releases, highlighting key information and decisions made.

More detailed information can be found in the Modification Register.

Proposals currently in each stage



Recommended to proceed to Refinement Process

There are seven Draft Proposals being presented to the Panel for progression to the Refinement Process this month:

- DP094 'Supporting prepayment customers in no SM WAN scenarios'
- DP111 'SMDA Budget Amendments'
- DP125 'Correcting the ESME variant'
- DP128 'Gas Network Operators SMKI Requirements'
- DP129 'Allowing the use of CNSA variant for ECDSA'
- DP132 'DLMS references in GBCS'
- DP134 'Use of SMKI Certificates relating to a SoLR event'

Recommended to proceed to Report Phase

There are four Modification Reports being presented to the Panel for progression to the Report Phase this month:

- MP103 'DCC SOC2 Assessments'
- MP118 'Communications Hub Finance Charges'
- DP124 'Consequential changes to DUIS and MMC'
- DP127 'SMKI RAPP Security Screening clarification'

Decisions

The Change Board approved two Modification Proposals under Self-Governance this month:

- MP080 'Managing DUIS uplifts'
- MP115 'Changes to the NSCS Good Practice Guides'





The Authority issued determinations on two Modification Proposal this month:

- MP084 'Other User Panel Seating Amendment' rejected
- MP130 'CH order and delivery changes due to COVID-19' approved





2. Define

New Draft Proposals

DP125

DP125 'Correcting the ESME variant' was raised by John Noad from Npower on 7 May 2020.

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

DP126

<u>DP126 'Smart meter consumer data access and control'</u> was raised by Ed Rees from Citizens Advice on 11 May 2020.

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 consumers' 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 have issues where data is incorrectly logged or processed, data breaches or consent issues which leads to consumers issues with privacy and security.

DP127

<u>DP127 'SMKI RAPP Security Screening clarification'</u> was raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC) on 11 May 2020.

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

<u>DP128 'Gas Network Operators SMKI Requirements'</u> was raised by Earl Richards of Cadent Gas on 11 May 2020.

Gas Network Operators are required by the SEC to place their Smart Metering Key Infrastructure (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

<u>DP129 'Allowing the use of CNSA variant for ECDSA'</u> was raised by David Rollason from the DCC on 12 May 2020.

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

MP130

MP130 'CH order and delivery changes due to COVID-19' was raised by David Rollason from the DCC on 12 May 2020.

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.

The Proposer requested this be treated as an Urgent Proposal. This request was approved by the Authority. On Friday 22 May, The Change Board voted to recommend the Authority approve this Modification Proposal. The Authority approved this modification on 26 May 2020, and it was implemented on 27 May 2020.

DP131

<u>DP131 'Default maximum demand configuration conflict'</u> was raised by Chun Chen from the DCC on 21 May 2020.



Report – June 2020



According to the Smart Metering Equipment Technical Specifications (SMETS), GBCS use case definitions, the DCC User Interface Specification (DUIS) and the Message Mapping Catalogue (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.

Following implementation of SECMP0018 'Standard Electricity Distributor Configuration Settings', GBCS Table 28d is in conflict with ENA-required default configuration and the above SEC documents. It is proposed that a correction is made to GBCS v3.2 Table 28d to align it with the ENA-required default configuration.

DP132

DP132 'DLMS references in GBCS' was raised by Tony Pile from Landis & Gyr on 21 May 2020.

The Device Language Message Specification (DLMS) has issued a new version of the DLMS Green and Blue Books. These documents are referenced in the GBCS and must be updated.

DP133

DP133 'Consequential changes to SEC Section G' was raised by Simon Crouch from Utiligroup on 22 May 2020.

Currently SEC Section G1.7 lists exclusions for Export Suppliers and Registered Supplier Agents (RSAs). The "Shared Resources" section isn't currently listed under G1.7, which means these Parties can ignore those obligations whilst not being in breach of the SEC. This error needs to be corrected.

DP134

DP134 'Use of SMKI Certificates relating to a SoLR event' was raised by Easton Brown from DCC on 29 May 2020.

Only the relevant Supplier (or their agent) holds the SMKI Private Keys that enable Critical Commands, such as Emergency Credit, to be sent and actioned by the meter. It can commonly take between two and four weeks from the point of SoLR appointment for the new Supplier to change the SMKI Certificates and much longer in some instances where there are problems with data and communications. During this time Prepayment meter customers may be off supply.

Change Sub-Committee decisions

On 26 May 2020, the Change Sub-Committee (CSC) determined that the following Draft Proposals were ready to be presented to the Panel for conversion to a Modification Proposal:

- DP094 'Supporting prepayment customers in no SM WAN scenarios'
- DP124 'Consequential changes to DUIS and MMC'
- DP125 'Correcting the ESME variant'





- DP127 'SMKI RAPP Security Screening clarification'
- DP128 'Gas Network Operators SMKI Requirements'
- DP129 'Allowing the use of CNSA variant for ECDSA'

On 4 June 2020, the CSC subsequently agreed via correspondence that the following Draft Proposals should be presented to the Panel for conversion to a Modification Proposal:

- DP132 'DLMS references in GBCS'
- DP134 'Use of SMKI Certificates relating to a SoLR event'





3. Refine

Working Group meetings

The last monthly Working Group meeting was held on 3 June 2020, and included the following modifications:

- MP077 'DCC Service Flagging'
- MP090 'Incorporation of Non GBCS Non-Mandated Alerts into the SEC'
- MP095 'Alignment of SEC Credit Cover'
- MP102B 'Power Outage Alerts triggered by an OTA firmware upgrade enduring solution'
- MP105 'Sending SR11.2 to Devices in Suspended State'
- MP122 'Operational Metrics'

The next monthly Working Group meeting will be held on 1 July 2020, and the provisional agenda for this session will be announced on 17 June 2020.

Refinement Consultations

There are currently no Modification Proposals out for Refinement Consultation.

The following Refinement Consultations are expected to be issued in the week commencing 8 June 2020:

- MP090 'Incorporation of Non GBCS Non-Mandated Alerts into the SEC'
- MP122 'Operational Metrics'

Impact Assessment requests

No Impact Assessments were requested at the May 2020 Change Board meeting.

DCC Assessment timescales

The timescales below cover the 12-month period up to the end of May 2020.

Summary					
Assessment	Total	Average duration			
Preliminary Assessments open	6	78 WD			
Preliminary Assessments completed in the last 12 months	13	44 WD			
Impact Assessments open	3	113 WD			
Impact Assessments completed in the last 12 months	5	79 WD			





Open Assessments					
Modification	Type	Accepted	Target duration	Current duration	
SECMP0007	IA	6 Feb 20	40 WD	82 WD	
SECMP0056	IA	2 Jul 19	40 WD	239 WD	
SECMP0066	PA	13 Jun 19	15 WD	252 WD	
MP078	PA	17 Apr 20	15 WD	31 WD	
MP092	PA	2 Dec 19	15 WD	130 WD	
MP099	IA	5 May 20	40 WD	19 WD	
MP106	PA	26 Mar 20	15 WD	34 WD	
MP107	PA	20 Apr 20	15 WD	21 WD	
MP109	PA	26 May 20	15 WD	1 WD	

Assessments completed in the last 12 months					
Modification	Type	Returned	Target duration	Actual duration	
SECMP0015	IA	30 Apr 20	40 WD	266 WD	
SECMP0024	PA	21 Feb 20	15 WD	193 WD	
SECMP0046	PA	9 Sep 19	15 WD	31 WD	
SECMP0053	IA	20 Sep 19	40 WD	35 WD	
SECMP0062	IA	4 Jul 19	40 WD	77 WD	
SECMP0063	PA	1 Aug 19	15 WD	18 WD	
SECMP0067	PA	5 Jun 19	25 WD	24 WD	
SECMP0067	IA	12 Mar 20	40 WD	17 WD	
MP077	PA	31 Dec 19	40 WD	40 WD	
MP078	PA	31 Dec 19	15 WD	66 WD	
MP080	PA	17 Jan 20	15 WD	41 WD	
MP090	PA	11 Feb 20	15 WD	58 WD	
MP090	PA	15 Apr 20	15 WD	17 WD	
MP093	PA	21 Jan 20	15 WD	37 WD	
MP093	IA	6 Mar 20	40 WD	2 WD	
MP099	PA	17 Mar 20	15 WD	27 WD	
MP105	PA	4 May 20	15 WD	15 WD	
MP122	PA	28 May 20	15 WD	10 WD	





4. Opine

Modification Report Consultations

There are currently no Modifications Proposals out for Modification Report Consultation.

The following Modification Report Consultations are expected to be issued in the week commencing 22 June 2020:

- MP103 'DCC SOC2 Assessments'
- MP118 'Communications Hub Finance Charges'
- MP124 'Consequential changes to DUIS and MMC'
- MP127 'SMKI RAPP Security screening clarification'

Change Board votes

The Change Board voted on two modifications on 27 May 2020:

- MP080 'Managing DUIS uplifts' was **approved** under Self-Governance for implementation in the November 2020 SEC Release.
- MP115 'Changes to the NCSC Good Practice Guides' was **approved** under Self-Governance for implementation in the November 2020 SEC Release.

The Change Board voted on the following modification during an ad-hoc Change Board meeting on 22 May 2020:

• MP130 'CH order and delivery changes due to COVID-19' was sent to the Authority for final decision with a recommendation to **approve**.

Authority decisions

The Authority issued determinations on the following modifications:

- <u>SECMP0067 'Service Request Traffic Management'</u> was **sent back** on 27 May 2020 for further work.
- MP084 'Other User Panel Seating Amendment' was rejected on 27 May 2020.
- MP130 'CH order and delivery changes due to COVID-19' was approved on 26 May 2020 for implementation one Working Day following approval

There is one Modification Proposal currently with the Authority for decision:

MP088 'Power to raise modifications'





Modification progression timescales

The timescales below cover the 12-month period up to the end of May 2020.

Proposal timescales				
Status	Total	Average duration		
Proposals open (pre-decision)	60	279 WD		
Proposals concluded in the last 12 months	23	115 WD		





5. Releases

SEC Releases

Three modifications were implemented in the June 2020 Release (6 May 2020):

- SECMP0053 'Amend Target Response Times for Service Requests Critical to Installation and Commissioning Processes'
- SECMP0062 'Northbound Application Traffic Management Alert Storm Protection' part 1
- MP114 'Alt HAN P2P Charging Data' (implemented on 7 May 2020)

One modification was implemented as a standalone release on 27 May 2020:

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

One modification was implemented as a standalone release on 29 May 2020:

MP123 'IVP realignment of SMETS2 v2.0 and v3.1'

There are currently seven modifications approved for implementation in the November 2020 Release (5 November 2020):

- SECMP0062 'Northbound Application Traffic Management Alert Storm Protection' part 2
- MP080 'Managing DUIS uplifts'
- MP081 'Alignment of DUIS and CHISM to reflect current DCC Processing'
- MP093 'Implementing IRP511 and CRP535 to support GBCS v3.2 devices'
- MP112 'Setting the Privacy Assessment Assurance Status'
- MP115 'Changes to the NCSC Good Practice Guides'
- MP120 'Correcting DUIS Matrix for SRV7.7 Eligible Users'

