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SECMP0056 ‘IHD / PPMID Zigbee Attributes Available on the HAN’ Annex D Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the SECMP0056 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	Yes	-
EDF	Large Supplier	No	<p>We do not feel that sufficient information has been provided to enable us to agree with the solution proposed.</p> <p>While we agree that it is critical to ensure that consumers' personal data is appropriately protected, insufficient information is provided in the report to enable us to determine whether the proposed solution is either appropriate or necessary.</p> <ul style="list-style-type: none"> It is noted in the report that key concern is the implications for compliance with GDPR – has any advice been sought or provided (for example legal advice or from the ICO) to confirm the level of compliance risk associated with this issue? It is noted that PPMIDs are not currently capable of being upgraded remotely, and even if SECMP0007 were to be approved it might not be possible to upgrade devices provided before this Modification comes into effect. If existing devices can not be upgraded would they continue to pose a GDPR compliance risk, and would the only way to mitigate this be to replace those devices? If that replacement is not deemed necessary, it would seem to undermine the benefits associated with this Modification.
Smartest Energy	Small Supplier	Yes	This modification helps to ensure all suppliers are GDPR compliant.
SSE Retail	Large Supplier	Yes	<p>The proposed solution will enable the functionality in SMETS2 for the ESME, GPF and other Devices to remove the historical information on notification of a CoT so it is no longer available for Devices to display.</p> <p>We note from the Modification Report that there is a potential dependency on SECMP0007 for existing PPMIDs, as firmware upgrades will be required. This would be to ensure their Devices are able to request the information about CoT from the EMSE and GPF.</p>
E.ON UK	Large Supplier	Yes	The solution will deliver the proposal in the simplest terms to implement.

Question 1			
Respondent	Category	Response	Rationale
Chameleon	Other SEC Party	Yes	It appears to add the commands and behaviour around them necessary to support Change of Tenancy although we have some reservations detailed below.
Green Energy Options Ltd	Other SEC Party	Yes	GEO supports the addition of the Change Of Tenancy command to the required supported commands to the ESME, GPF, PPMID and IHD. The addition would provide a clear indication to customer interface devices (PPMID/IHD) that the connected meter environment has been notified that a recipient of the energy supply has changed and can take the appropriate action to remove data considered to be private belonging to the previous customer. The device would no longer need to try to deduce the change from other data items which is prone to detection failure or erroneous detection negatively impacting the user experience. Furthermore, GEO agrees that the use of the commands to notify the change of tenancy event is preferred as this would limit the increase in HAN traffic to support this feature which is important for deployments using the SubGig band.

Question 2: Will there be any impact on your organisation to implement SECMP0056?

Question 2			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	Yes	We are developing S1 meter according to GBCS 2.0 Draft 5 and also certifying Zigbee Smart Energy Profile, so if this modification takes place we have to recertify the Device Management Cluster.
EDF	Large Supplier	Yes	<p>We will be impacted should SECMP0056 be approved for implementation.</p> <p>It is, however, very difficult to isolate and identify the impacts of making any one change as these changes will be made as part of a wider change to the Technical Specifications. We will incur a significant cost for moving to any new version of the device Technical Specifications – the specific impacts associated with individual changes within those new versions is incredibly difficult to identify.</p> <p>Any new version of the Technical Specifications will have the following impacts, amongst others:</p> <ul style="list-style-type: none"> • Engaging with device manufacturers to procure devices compliant with the revised versions of the Technical Specifications • Testing of existing devices that are deemed compatible with the revised versions of the Technical Specifications • Testing of the new devices to ensure they are compliant • Operational transition from installation of the previous version of devices to the new version • Design build and test changes to our internal systems to comply with the new versions of the Technical Specifications

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Question 2			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> Regression testing of the new versions the Technical Specifications against current. E2E testing of the new version of the Technical Specifications in the DCC UIT environment Transition to the new version of the Technical Specifications Post-implementation support for the new version of the Technical Specifications
Smartest Energy	Small Supplier	No	-
SSE Retail	Large Supplier	Yes	<p>There will be testing impacts; if the change is wrapped up into firmware releases containing multiple fixes, then there will be minimal impact as we test all firmware before it is released, so this will minimise test effort spent on this specific change.</p> <p>If new firmware is created solely to implement this change then that testing time will be focused solely on verifying this fix, rather than taking the opportunity to verify further defect fixes at the same time.</p> <p>As per our response to Question 1, this proposal places some reliance on SECMP0007 to enable OTA of existing SMETS2 PPMID. If this is not available, there will be Supply Chain impacts with the ordering of replacement PPMIDs.</p>
E.ON UK	Large Supplier	Yes	<p>New asset firmware will need to be developed to be able to deliver the proposals capability. This will require testing and acceptance.</p> <p>We will also have a large volume of assets already deployed that will not have this capability, therefore, it is crucial that SECMP0007 is also delivered to accommodate those assets which will form a large proportion of installs by the end of 2020.</p>

Question 2			
Respondent	Category	Response	Rationale
Chameleon	Other SEC Party	Yes	We believe that overall this will have a positive impact for our organisation despite the implementation effort and on-going activities required to support it.
Green Energy Options Ltd	Other SEC Party	Yes	The impact on the devices provided by GEO will be limited to supporting the end-to-end validation and the possibility of implementing minor correction to the already implemented support for the Change of Tenancy Commands.

Question 3: Will your organisation incur any costs in implementing SECMP0056?

Question 3			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	Yes	Zigbee recertification costs.
EDF	Large Supplier	Yes	As noted in our response to Question 2 it is very difficult to isolate and identify the impacts of making any one change as it will be made as part of a wider set of changes to the Technical Specifications. We will incur a significant cost for moving to any new version of the device Technical Specifications – the specific costs associated with individual changes within those new versions is incredibly difficult to identify.
Smartest Energy	Small Supplier	No	-
SSE Retail	Large Supplier	Yes	There will be costs incurred for testing and assisting with implementation of SECMP0007 (liaison with manufacturers etc.).
E.ON UK	Large Supplier	Yes	No new SRs are required to deliver this proposal meaning no known IT implementation requirements on our behalf. It is to be delivered on an asset level within the HAN, which we may incur development costs from manufacturers from this added feature.
Chameleon	Other SEC Party	Yes	We will need to comply with the change which has required a modest amount of engineering effort. This additional behaviour will need certifying in all future devices as well as testing with customers in their labs. This is unlikely to have a material effect on the unit cost that the industry will pay.
Green Energy Options Ltd	Other SEC Party	Yes	Estimates of the costs incurred with the implementation of SECMP0056 cannot be estimated at this stage as it will depend on the support GEO would need to provide during the end-to-end validation and any compatibility issues that need to be resolved. It would also be unclear if the additional functionality would result in higher assurance cost of the devices through SMDA.

Question 4: Do you believe that SECMP0056 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	Yes	From customer point of view the data protection is a key value.
EDF	Large Supplier	Yes	We would agree that SECMP0056 would seem to better facilitate SEC Objective (f) as it would protect personal data from being viewed by a new tenant. What is not clear from the report is the extent to which the current functionality is not compliant with the requirements of GDPR, and the level of risk that Suppliers might be exposed to as a result of not making this change. While data privacy is incredibly important, it needs to be ensured that any changes have a cost that is proportionate to the risk and impact of any non-compliance.
Smartest Energy	Small Supplier	Yes	This modification will better facilitate SEC Objective (a) to ensure suppliers are GDPR compliant and objective (f) as preventing historical data being displayed to a new tenant is a GDPR requirement.
SSE Retail	Large Supplier	Yes	Objective (f): We agree that this will better facilitate this General SEC Objective as it will ensure that customer data is protected and remain compliant with GDPR requirements for data security.
E.ON UK	Large Supplier	Yes	We believe that SECMP0056 facilitates the General SEC Objectives in line with the proposer's original proposal, with the additional facilitation of Objective C. Objective A. Smart Metering Operation is maintained, and only information relevant to the current tenant will be available. Objective C.

Question 4			
Respondent	Category	Response	Rationale
			<p>This proposal provides the new tenant with the appropriate information for them to manage their electricity and gas consumption.</p> <p>Objective F.</p> <p>Ensures we are protecting the previous tenant's data by not making it available to the new tenant.</p>
Chameleon	Other SEC Party	Yes	This modification aligns with General SEC Objective F.

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0056 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	Yes	Due to the General Data Protection Regulation.
EDF	Large Supplier	No	As before, while we agree that consumers' personal data needs to be protected, we do not believe that sufficient information has been provided in the report to allow us to determine whether the proposed solution is proportionate to the risk associated with the current device functionality. Without this information we would not be able to support the approval of this Modification.
Smartest Energy	Small Supplier	Yes	This modification has no draw backs and the penalties for suppliers who fail to be GDPR compliant could have severe repercussions as a result.
SSE Retail	Large Supplier	Yes	We believe that SECMP0056 should be approved as this will ensure that data pertinent to a previous occupier will not be visible to the new occupier where there is a Change of Tenancy. We have noted the costs and benefits however it is difficult to fully assess, given there is no breakdown of costs within the DCC Preliminary Assessment.
E.ON UK	Large Supplier	Yes	We believe this SECMP should be progressed.
Chameleon	Other SEC Party	Yes	The benefits of more consistent and reliable consumer data protection outweigh the costs.
Green Energy Options Ltd	Other SEC Party	Yes	The implementation of SECMP0056 would result in a more robust smart meter environment where a consist behaviour of the customer interface devices (PPMID/IHD) can be provided. Energy Suppliers should have greater confidence that devices gained through change of supplier will have implemented a consistent mechanism to support the change of tenancy use case.

Question 6: How long from the point of approval would your organisation need to implement SECMP0056?

Question 6			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	2 Months	Development, testing and ZSE Certification.
EDF	Large Supplier	12 Months	We would require a minimum of 12 months from approval of this Modification to be able to start to transition to the provision and installation of devices that are compliant with a new version of the Technical Specifications.
Smartest Energy	Small Supplier	N/A	As there is no additional work for Suppliers, any changes will be to processes and will not need additional time to implement
SSE Retail	Large Supplier	12 Months +	Difficult to ascertain until we get the exact proposal; we would need at least 12 months to undertake the required engagement with Device Manufacturers and for testing purposes.
E.ON UK	Large Supplier	6 Months + from approval, phased with DCC delivery	Assets will need this capability to be developed and built into their firmware by the manufacturers and tested by suppliers to provide assurance the new firmware is not defective.
Chameleon	Other SEC Party	Zero days	We already have speculatively adopted support in-line with this modification in our latest products however we do not include the midnight poll referred to in the proposal documents.
Green Energy Options Ltd	Other SEC Party	Less than 1 month	Devices available from GEO already support the Change of Tenancy commands. Time would be required for end-to-end testing and implementation of any compatibility issues identified during the test cycle. Note additional time would be required for SMDA assurance, in line with the lead times associated with the scheme.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	No	I think that it is not clear how the ESME clears the last active supplier message. Will it be using Messaging Cluster with Cancel Message Command? As in GBCS Table 7.4 it is not specified and the content will have to be changed to reference SMETS spec.
EDF	Large Supplier	Yes	We agree that the November 2020 SEC Release is the earliest SEC Systems Release that this change could be included in.
Smartest Energy	Small Supplier	Yes	DCC have advised this is the earliest date this change can be included in.
SSE Retail	Large Supplier	Yes	If the proposed implementation is November 2020, as per Section 6. We note that Section 1 Summary has a provisionally targeted implementation date of June 2020.
E.ON UK	Large Supplier	Yes	The sooner the better for all parties, any options to bring this date forward should be considered.
Chameleon	Other SEC Party	Yes	Broadly we agree with the approach adopted and timescales. Using the publish-subscribe option Zigbee offers is likely to use less bandwidth and give a more responsive user experience.

Question 8: Do you agree that the legal text will deliver SECMP0056?

Question 8			
Respondent	Category	Response	Rationale
Ziv Automation	Other SEC Party	No	See answer to question 7.
EDF	Large Supplier	Yes	We have not identified any issues with the legal text – but we have not been able to undertake a detailed technical review of the legal text with our device manufacturers.
Smartest Energy	Small Supplier	Yes	The changes added confirms what should take place.
SSE Retail	Large Supplier	Yes	We agree with the legal text drafting; however, we seek clarification on the reason for the difference in legal text for Section 6.5.1 iv and Section 7.5.1 iv. We believe these should be aligned and that the relevant SMETS2 references for PPMID are included.
E.ON UK	Large Supplier	No	Updates to Sections 5 and 6 of SMETS is okay. We believe the amendment to section 7.5.1 should be (changes highlighted); iv. receiving information regarding a Change of Tenancy (and updates every day at midnight UTC) and if a Change of Tenancy has occurred to clear, if stored on the PPMID, all historic consumption data, Top-Up history, information regarding Debt Recovery and Supplier Messages.
Chameleon	Other SEC Party	Yes with the following reservations	The current text mandates the PPMID device to support the CoT command and if relevant clear any historical data and supplier messages. We believe this should be reworded to state that a PPMID device should support the CoT command if it stores historical data and supplier messages. The proposed SMETS text could imply the intention captured in the 0.7 Business Requirements that an IHD or PPMID should poll at midnight for new CoT events. We do not believe that polling at midnight is necessary due to the unsolicited push mechanism. We believe that it is appropriate to poll at power-on and after periods being disconnected from the network. However we recognise the group agreed the IHD or PPMID would poll once every 24 hours though not necessarily at midnight and we have included behaviour that in fact polls every 3 hours.

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Question 8			
Respondent	Category	Response	Rationale
Green Energy Options Ltd	Other SEC Party	Yes	GEO believe that the changes/additions to GBCS, SMETS and CHTS are in line with the purpose of this modification request.

Question 9: Please provide any further comments you may have

Question 9		
Respondent	Category	Comments
SSE Retail	Large Supplier	We note from the Modification Report that reference is made to SECMP0007 being an enabler to support the firmware upgrades of existing PPMIDs. How and where are dependencies between different SEC modifications being managed, to ensure that development and implementation is aligned?
E.ON UK	Large Supplier	<p>Delivery of SECMP0007 is critical to delivering this capability across all currently deployed assets which will account for a large proportion on installs by the end of 2020.</p> <p>A detailed breakdown of costs should be made available from the DCC.</p> <p>Every potential cost saving measure should be explored by the DCC to test and deliver the agreed approach, in line with other SECMPs that are currently being reviewed for delivery.</p>
Chameleon	Other SEC Party	<p>Throughout the SEC documentation (and in the modification title itself) "zigbee attributes" are referred to however it is worth noting that no attributes are included in this modification, the changes only concern zigbee commands.</p> <p>As stated above we agree that IHDs (and PPMIDs where relevant) should support the Change of Tenancy commands by polling at power-up and rejoin. Although there shouldn't be a need to poll at other times due to the unsolicited push mechanism we've adopted a 3 hour poll rate. We do not feel there should be any expectation for devices to explicitly poll at midnight, providing the 24hour poll rate is honoured. Device management servers (ESMEs and GPFs) should, as stated in the modification documents and in line with zigbee, push out any CoT information on receipt of it from suppliers.</p> <p>We strongly reject the DCC's marked up comment in section 2.3.3 of their PIA stating that IHDs and PPMIDs must ignore the Implementation Date/Time. It is our understanding this will break the mechanisms used by zigbee.</p>
Green Energy Options Ltd	Other SEC party	GEO does not believe that the implementation of SECMP0007 would necessarily address the concern raised related to devices (IHDs/PPMIDs) already deployed in the field. The assumption with this statement would be that devices already deployed would support the firmware upgrade methodology as defined in SECMP0007.