This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

SECMP0056

'IHD / PPMID ZigBee Attributes Available on the HAN'

Final Modification Report

Version 2.0

17 March 2021

About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

Contents

This document also has seven annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex C** contains the full Data Communications Company (DCC) Impact Assessment response.
- **Annex D** contains a cost breakdown of the DCC Impact Assessment (**RED**).
- **Annex E** contains the full responses received to the first Refinement Consultation.
- **Annex F** contains the full responses received to the Modification Report Consultation.
- **Annex G** contains the full responses received to the second Refinement Consultation.

Contact

If you have any questions on this modification, please contact:

Bradley Baker

020 7770 6597

bradley.baker@gemserv.com

1. Summary

This proposal has been raised by Emslie Law from OVO Energy.

Currently under the SEC, Smart Metering Equipment Technical Specifications (SMETS) 2 In-Home Displays (IHDs) and Prepayment Interface Devices (PPMIDs) are not notified of a Change of Tenancy (CoT) event. This could allow a new tenant to access the previous tenant's personal information and place the Supplier in potential breach of the General Data Protection Regulation (GDPR). This is the case for all IHDs and PPMIDs.

In SMETS1 the ZigBee attributes available to connected Devices on the Home Area Network (HAN) allow Devices to be notified of a CoT and so these do not display data prior to these events. The solution proposes to make Zigbee attributes for CoT parameters available in SMETS2 to HAN Devices such as IHDs and PPMIDs and also mandate IHDs and PPMIDs to query the Electricity Smart Metering Equipment (ESME) and Gas Proxy Function (GPF) for CoT information.

Suppliers, the DCC and Other SEC Parties (Device Manufacturers) will be impacted by this modification. The DCC Impact Assessment states that the changes required for this modification will cost approximately £1.7m if implemented in the June 2022 SEC Release alongside other modifications. If approved this modification is targeted for the June 2022 SEC Release. This is an Authority Determined Modification.

2. Issue

What are the current arrangements?

SMETS1 and 2 include CoT Zigbee attributes which are available over the HAN and notifies the ESME and GPF when a CoT has taken place. This means that the EMSE and GPF do not display historical data after that date.

In SMETS1 this attribute is also available to the IHD and PPMID over the HAN. This means that HAN Devices such as IHDs and PPMIDs do not display the previous occupier's personal data once the CoT notification has taken place, and the data has been cleared from the IHD or PPMID memory.

In SMETS2 this Zigbee attribute is not made available to the IHD/PPMID and therefore the IHD/PPMID does not know a CoT has taken place. Any data downloaded to the Device will continue to be displayed to the new occupier.

The possible data an IHD or PPMID can display that could be deemed personal is:

- Consumption data (at half-hourly granularity, if the Device displays data at this level)
- Personal messages received from the Supplier (if a Supplier has sent messages)
- Debt information (specifically on PPMIDs)

In order to ensure data is cleared from a PPMID, the Supplier is able to set ESME and GPF to credit mode, to clear the debt, and then it would also be removed from the IHD / PPMID.

What is the issue?

Due to the ZigBee attributes not being included in SMETS2 as being available to IHDs and PPMIDs, connected Devices can display a previous occupier's data following a CoT. This would allow a new occupier to view this potentially personal data, which could include consumption data (possibly available at a half-hourly level) and possibly personal messages relating to tariffs or debt information of the previous tenant if the Supplier has sent this type of information. In terms of displaying a previous tenant's information relating to debt, a PPMID will calculate the level of debt automatically. Without a clear signal when to remove this data it is likely that if the new occupier is using prepayment mode, the previous occupier's data will be displayed. Along with the new occupant knowing the previous occupant's name and former address, this could be considered a potential GDPR breach.

What is the impact this is having?

If this issue is not addressed, connected Devices adhering to SMETS2 specifications will continue to potentially display personal data to unintended Consumers. This will mean that electricity and gas Suppliers may not be providing an adequate level of data protection and privacy for their Consumers. This could lead to a potential breach of GDPR.

3. Solution

Proposed Solution

The solution proposes to make Zigbee attributes for CoT parameters available to SMETS2 HAN Devices such as IHDs and PPMIDs. Furthermore, the solution will mandate IHDs and PPMIDs to query the ESME and GPF for CoT information. This will allow the HAN Device to be notified when a CoT has taken place and will subsequently clear all data belonging to the previous occupier.

The business requirements for this solution can be found in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers		Meter Installers

Breakdown of Other SEC Party types impacted			
✓	Device Manufacturers		Flexibility Providers

Supplier Parties

This modification will enable the functionality in SMETS2 for the ESME, GPF and other Devices to remove the historical information upon notification of a CoT so it is no longer available for Devices to display. There will be no additional work for Suppliers, but as this modification will involve a change to the Great Britain Companion Specification (GBCS) and SMETS, there will be an associated technical specification uplift.

Other SEC Parties – Device Manufacturers

Device Manufacturers will need to ensure their Devices are able to request the information regarding a CoT from the ESME and GPF. As previously stated, this modification will involve a change to GBCS as well as an associated firmware upgrade to prevent a previous occupier's personal data being displayed on the IHD / PPMID after the relevant CoT has taken place.

DCC System

Minor changes are required to the Communications Hubs and the DCC noted in the Preliminary Assessment that there may be an increase in Service Request volumes as a result of this change. No specific infrastructure requirements or changes have been identified.

The full impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex C.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 8 'Great Britain Companion Specification' (GBCS)
- Schedule 9 'Smart Metering Equipment Technical Specifications' (SMETS)
- Schedule 10 'Communications Hub Technical Specifications' (CHTS)
- Schedule 11 'Technical Specification Applicability Tables' (TSAT)

The changes to the SEC required to deliver the proposed solution can be found in Annex B.

Technical specification versions

This modification will be implemented in the latest versions of the Technical Specifications issued at the relevant SEC Release. The current expectation is that the June 2022 SEC Release will incorporate the Enduring Change of Supplier (ECoS) changes to DCC Systems. SECMP0056 will be implemented in the latest sub-versions of the Technical Specifications. This will result in the modification being implemented into Electricity Smart Metering Equipment Technical Specifications (ESMETS) v5.x, Prepayment Meter Interface Device Technical Specifications (PPMIDTS) v4.x, GBCS v4.x, and CHTS v1.x.

Consumers

The Proposed Solution will result in a higher level of data protection for Consumers. A Consumer's data will no longer be available on an IHD or PPMID once a CoT has occurred.

Other industry Codes

There are no anticipated impacts on other industry Codes.

Greenhouse gas emissions

There are no anticipated impacts on greenhouse gas emissions.

5. Costs

DCC costs

The DCC implementation cost to implement this modification is £1,686,068. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	**Cost**
Design, Build and Pre-Integration Testing (PIT)	£1,434,761
Post-PIT	£251,307

The DCC has provided a revised breakdown of implementation costs for this modification. As this modification is targeted for the June 2022 SEC Release, the cost of implementation has been recalculated as part of a scheduled SEC Release, as opposed to a standalone release. Post-PIT costs will be split across all modifications included in this release.

More information can be found in revised breakdown of the DCC Impact Assessment in Annex D (**RED**).

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

The majority of Refinement Consultation respondents believed that SEC Parties will incur costs due to testing and development although no estimated costs were provided. A respondent also flagged that costs will be incurred due to ZigBee certificate recertification.

Further information was sought from SEC Parties when investigating the business case. One respondent had stated that the costs their Party would incur would be negligible. Another respondent commented that it would be dependent on whether they would need to procure new Devices or upgrade Devices currently installed to prevent any potential data breach.

6. Implementation approach

Approved implementation approach

The Panel approved an implementation date of:

- **30 June 2022** (June 2022 SEC Release) if a decision to approve is received on or before 30 July 2021; or
- **3 November 2022** (November 2022 SEC Release) if this is a technical specification uplift and if a decision to approve is received after 30 July 2021 but on or before 3 December 2021.

As the change impacts Technical Specifications, the modification should be implemented in a SEC Release that includes an uplift to the Technical Specifications. Due to the 11-month lead time, the earliest release this modification can be implemented in is the June 2022 SEC Release. New versions of the Technical Specifications are usually targeted for November SEC Releases; however, the DCC has advised that due to the planned implementation of ECoS, including updates to the Technical Specifications in the June 2022 SEC Release will allow for cost savings relating to testing.

If, following a decision and allowing enough lead time, an earlier Release made updates to the Technical Specifications, the Panel may request that this modification be moved to that Release.

If the ECoS change does not go ahead in June 2022 and the next Technical Specification uplift occurs in November 2022 then this modification should be included in the November 2022 Release – the Panel would need to request a revised implementation date from the Authority if SECMP0056 had already been approved for the June 2022 SEC Release at that point. If, however the ECoS change does go ahead in June 2022, resulting in technical specification uplifts, but this modification misses the cut-off date, it will then be implemented in the next Release which includes a technical specification update.

7. Assessment of the proposal

Observations on the issue

The Proposer was initially concerned about GDPR issues around CoT, Change of Supplier (CoS), and threshold data. This has been discussed with SEC Parties to determine which items could be considered ‘personal data’ under GDPR.

SEC Parties had agreed that under SMETS1 the ability of the ESME and GPF to restrict data sent to IHDs after a CoT event was present but in SMETS2 this was missing, which presents a risk to Suppliers' compliance with GDPR. The Working Group also noted that TS0893 (an issue raised at the Technical Specifications Issue Resolution Sub-group (TSIRS)) resulted in an interim measure issued by BEIS to allow the best possible alignment with the requirements of GDPR until the final solution of this modification is implemented. This involved assuming a long period of non-consumption was a CoT however it could be considered that most CoTs involve an occupant moving out and another occupant moving in on the same day (such as a house move).

Solution development

The development of the Proposed Solution discussed whether the solution should be for the ESME and GPF to 'publish' the CoT information or to 'push' the information to the other Devices. The majority of the Working Group believed that the 'publish' method proposed was the best way to implement the changes needed and further expressed that they would rather not have two methods.

It agreed that changes to the Communications Hub software are required in order for the GPF to support this method, which will require the DCC to make changes.

The ZigBee attributes (bits #9 and #10 of the ProposedTenancyChangeControl Attribute) were discussed, and the solution put forward is that the information on bit #9 (currently 'clear data – customer') could be expanded to include Supplier messages data. The use of bit #10 has been discussed but it has been agreed to use only bit #9.

During a Working Group session, a member asked whether the Device should clear Top-Up history and information regarding Debt Recovery in addition to historic consumption data and Supplier messages which are already stated in the proposed legal text. SECAS responded that these attributes were not listed in SMETS to be displayed on the PPMID. If the attributes are not requirements in the SEC, and are being displayed, the Device Manufacturer is building Devices that are providing functionality that is additional to the Technical Specifications. This was investigated by SECAS and discussed offline with the respondent and the Proposer. It was agreed that the legal text cannot request that the information is deleted as it is not required to be displayed.

The group agreed that the ESME and GPF Servers needed to be able to publish the CoT and the IHD Client must be able to receive the CoT. In addition, the IHD client must be able to request CoT information and the ESME or GPF Server must be able to provide the information.

The group discussed the speed of the IHD clearing old data. It agreed that the Supplier would need to send appropriate Service Requests to set up the parameters (tariffs, pricing, payment mode, user message etc) for a new customer prior to sending the CoT notification. Alternatively, the Supplier should ensure that the applicable time in the CoT is selected such that tariffs, pricing, payment mode and user message are updated prior to the CoT being applied.

Assessing the GDPR risk

What scenarios could constitute a GDPR breach?

Details surrounding what constitutes a breach of GDPR were considered by the Working Group and information sought during the first Refinement Consultation and the Modification Report Consultation (MRC). A breakdown of each scenario can be found below.

Change of Tenancy

The Working Group agreed that consumption data, which could be considered to be 'personal data', is currently available in SMETS2 to the IHD and PPMID after a CoT event has taken place. This could lead to the risk that a new tenant may be able to view a previous tenant's consumption history. One respondent to the MRC believed that consumption data was aggregated up for display on IHDs and PPMIDs. They believed little 'personal data' could be gleaned from this information.

Change of Supplier

The Working Group discussed what information was passed from the ESME or GPF to the IHD or PPMID and who could view this information in a CoS scenario. It concluded that as a CoS scenario is most likely to be the same tenant simply changing energy Supplier (i.e. no simultaneous CoT), there is no need to restrict access to previous information stored on the ESME or GPF. The most likely scenario is for a CoT to occur followed by a CoS.

The Working Group further discussed possible future proposals that could potentially allow Consumers to change Supplier every half hour; implementing an IHD information wipe every half hour would mean no consumption data would be available on the HAN for the customer to view.

Dual Supplier situations

Working Group members discussed the dual Supplier scenario where one Supplier might be informed of a CoT and send a CoT Service Request and the other Supplier is either not informed or does not send this until sometime later (if at all). The group agreed that where one CoT is received, both sets of consumption data should be removed (gas and electricity). Where two CoTs are received on different days the data on the IHD and PPMID should be removed on both occasions. This might lead to the information being removed twice, but the group agreed that this was the most reliable method to prevent the IHD retrieving and re-populating the historical data.

Supplier Messages

The Working Group considered the messages sent by Suppliers to PPMIDs and whether these messages are stored or deleted on a CoT. The group agreed that consumption data and Supplier messages which could be personal to the Consumer should be cleared. No Suppliers had confirmed that Devices they procured had this functionality or they had sent these type of messages. Responses to the second Refinement Consultation stated that IHDs / PPMIDs can display personal messages, though the respondents do not use this functionality.

Threshold Values

The Working Group considered whether threshold information was considered personal information and would allow identification of a consumer. This would likely depend on if the Supplier was setting the thresholds or the Consumer. The group agreed that data such as thresholds and Supplier name and telephone number could not be considered personal data and does not need to be cleared.

Debt

The Working Group considered a customer's debt information to be personal. However, in order to, ensure data is cleared from a PPMID the Supplier is able to set ESME and GPF to credit mode, to clear the debt, and then it would also be removed from the IHD / PPMID. The Supplier could then set the meter back to Prepayment mode. A Refinement Consultation respondent later confirmed that they do use this approach.

Power-Cycling Solution

A further suggestion was whether or not completing a 'power-cycle' of the IHD / PPMID would clear the data displayed. This may be possible; however, it would have to be carried out either by the new tenant or by an engineer visiting site. The only way to ensure that the IHD / PPMID respect the CoT is for the ESME and GPF to pass on the CoT to the relevant Device.

Information Commissioner's Office views

To further understand the business case for the modification, SECAS sought the views of the Information Commissioner's Office (ICO). The ICO gave its opinion on the issue identified under SECMP0056.

The ICO stated that if the Consumer were to suffer a personal data breach, they are legally obligated to inform the ICO if there is a risk of detriment to the rights and freedoms of the effected Consumer. It also advised that this may have to be treated on a case-by-case basis. It would be the Consumer's responsibility to assess the risk of detriment and make a decision on whether to report a breach to the ICO. The ICO commented that it is difficult to speculate the level of regulatory action that may need to be taken at the enquiry stage and so commented no further on this.

To summarise, the ICO stated the following points:

- Personal data must be collected and processed fairly and lawfully.
- Personal data must only be used for the specified purposes for which they were collected, and that any further processing of personal data is compatible and that the data subjects are well informed.
- Parties must minimise the data collected and retained.
- Consumers must be able to exercise all of their information rights.
- Data must be aggregated where possible so that information about individuals cannot be identified from the data.

The Gemserv Data Protection Team's views

Further to the engagement with the ICO, SECAS discussed the modification with the Gemserv Data Protection team. The team provided a formal response to the modification which was taken to the SEC Working Group. The key points of the response were:

- Currently, the situation involving the potential for a SMETS2 Device to display personal information belonging to a previous Consumer / tenant of a premise, to a new tenant at the same premise would lead to a breach of the provisions in SEC Sections I1.2 and I1.5, in

addition to Articles 6(1) and 32 of the GDPR, due to the unauthorised processing and disclosure of Consumption Data and other personal data without consent;

- At a maximum, this breach could involve two separate fines of up to £17,860,000 and £8,930,000 respectively. The likelihood of a Consumer complaint or ICO investigation occurring, which could lead to such fines being applied to energy Suppliers, is moderate;
- The mitigations suggested in SECMP0056 will avoid a violation of the provisions in SEC Sections I1.2 and I1.5, in addition to Articles 6(1) and 32 of the GDPR.

Further assessment of the business case

The modification had been taken to the SEC Working Group several times during the Refinement Process for SEC Parties to fully realise the impact and scope of the modification, and to allow the business case to be understood.

Following the MRC, SECAS requested that, due to the high cost of implementation and the presentation of costs as a standalone release, the modification should be returned to the Refinement Process to allow SEC Parties to discuss the responses and for SECAS to engage with the DCC to collaborate on reducing costs and presenting them in a more representative manner. The Change Board agreed with this recommendation.

SECAS provided a breakdown of the initial implementation cost of £2,949,147. It was agreed that a higher level of transparency under DCC Assessment costs was needed. The DCC responded stating that a large part of the cost is to pay for stringent testing by the Service Providers as testing issues had occurred previously. SECAS sought further detail from the DCC to better understand the costs associated with the modification. The DCC confirmed that the modification had been costed as a standalone release, however the costs would be reduced significantly if costed as part of a scheduled SEC Release. SECAS held another Working Group and confirmed that, if approved, this modification will be implemented as part of a scheduled SEC Release, specifically the June 2022 SEC Release. This reduces the implementation costs to £1,686,068. Further information can be found in Annex D (**RED**).

The Working Group considered that a breach of the GDPR would be seen as the responsibility of the Supplier and would incur a fine of up to €20m or 4% of a company's annual turnover. It was stated that a potential GDPR breach is serious and that each Supplier should mitigate the costs of the modification against its own risk of causing a breach. Comments were received that even if a Device Manufacturer does not include the relevant ZigBee CoT attributes, it will still be the Supplier that is held accountable for any potential breach in GDPR.

However, questions were raised as to whether the information being made available could be considered 'personal' and how much of a risk the availability of this information constitutes considering:

- consumption data is likely to be aggregated;
- it is unknown if any Suppliers procure Devices with messaging functionality;
- it is unknown if Suppliers use the messaging functionality and if the messages contain information likely to be considered personal;
- debt can be cleared from PPMIDs by changing the meter to credit mode and then changing back to Prepayment mode which will also clear the IHD/PPMID data;

- power-cycling can be utilised, however, this may involve a site visit or asking the new occupant to perform the cycle;
- information is only displayed to the new occupant, not widely broadcast; and
- the new occupant can only view the previous tenant's information, not many consumers' information.

Second Refinement Consultation

As part of the further assessment, SECAS issued a second Refinement Consultation to gain more feedback from SEC Parties, allowing for further cost-benefit analysis.

SECAS received four responses to the consultation. Three respondents agreed with the Proposed Solution, as it is key to ensuring there is no ambiguity when identifying that a CoT has taken place. A respondent commented that it is critical that Consumers' personal data is appropriately protected. It was felt that the implementation will lead to increased efficiency in operations, an improved customer journey and a higher level of data protection. Other benefits listed were ensuring the protection of data on SMETS2 Devices and providing a new tenant with appropriate, relevant information for them to manage their own energy consumption.

One respondent, a Large Supplier, stated that they already fully support and comply with GDPR and the protection of customer data. They have carried out a review of their processes and feel that there is not a significant risk to their customers' data.

A respondent commented that there are impacts for them ensuring that their Device Manufacturers are using the version of firmware that this change is applied to and upgrading their portfolio for older versions. However, they are outweighed by any potential risk of the wrong data being presented to the wrong customer.

A question in the consultation asked Suppliers if their IHDs / PPMIDs that they have procured can display personal messages. One respondent commented that all PPMIDs they have procured can display personal messages. Another respondent stated that the maximum length of their procured Devices are limited to 116 characters.

The respondents stated that they do not send personal messages to their customers. One respondent stated that they only send generic messages such as 'welcome' messages, as personal messages are sent via post or email (as they cannot determine whether or not a customer has turned off their Device). Another respondent confirmed that they have not implemented the capability to send personalised messages. To confirm, the only respondent that does send messages, confirmed that these messages do not include data such as customer name, tariff or any other personal data.

SECAS asked whether Suppliers reset the debt information on PPMIDs by setting the meter to credit mode, then resetting it back to prepayment mode. One respondent replied that they do not do this, as debt can be adjusted without needing to change the meter mode on their PPMIDs. On the other hand, a responded stated that they do reset debt information by changing the mode on the meter. Their CoT process wipes all debt and other prepayment related data from both ESME and GSME.

A respondent raised concern that the legal text did not include amendments to the GSME. A CoT is actioned by Service Request (SR) 3.2 'Restrict Access for Change of Tenancy' whereby the two possible Device targets are the ESME and GPF. SR3.2 cannot be sent to the GSME and the GSME would not be aware of the CoT event. This Supplier Message is first sent to the GSME and then forwarded to the GPF. If for some reason the GSME forwards the Supplier Message again to the

GPF, it may reappear on the IHD / PPMID, unless the Supplier clears or overwrites the Supplier Message on the GSME. This has previously been flagged up as a potential issue and was considered an acceptable risk by the Working Group. Amending GSME functionality is therefore outside the scope of this modification.

A key point raised in the responses is that Suppliers should determine their own level of risk that they might be exposed to as a result of not making this change, dependent on the messages they may or may not send to IHDs / PPMIDs, and what capability they have for mitigating the risk of it being accessed by a new tenant. While data privacy is important, it needs to be ensured that any changes have a cost that is proportionate to the risk and impact of any potential non-compliance.

During the second Refinement Consultation, SECAS received some comments from BEIS regarding the legal text. SECAS have liaised with BEIS to ensure that the legal text is correct ahead of decision.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objective (f)[1]. The Proposer believes the Proposed Solution will ensure that customer data is protected and allows the Supplier to remain compliant with GDPR requirements for data security.

Industry views

The majority of respondents to the first Refinement Consultation believe this modification better facilitates SEC Objective (f). This is due to the Proposed Solution preventing personal data from being viewed by a new tenant, and thus not breaching GDPR requirements.

Two respondents felt that the modification better facilitates SEC Objective (a)[2] as Smart Metering Operation will be maintained and only information relevant to the current tenant will be available.

One respondent felt that this modification better facilitates SEC Objective (c)[3]. This is because the proposal provides the new tenant with the appropriate information for them to manage their electricity and gas consumption.

Views against the consumer areas

Improved safety and reliability

SECMP0056 will provide an improved level of Consumer safety as there will be mitigations against potential data breaches.

Lower bills than would otherwise be the case

SECMP0056 will have no impact on the cost of the Consumer's energy bills.

---

[1] Ensure the protection of data and the security of data and systems in the operation of the SEC.

[2] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

[3] Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Reduced environmental damage

SECMP0056 will have no impact on reducing environmental damage.

Improved quality of service

SECMP0056 will provide an improved quality of service to the Consumer, as the previous tenant's data will no longer be available on the IHD / PPMID. The Consumer's relationship with their Supplier could be jeopardised if a potential data breach were to occur.

Benefits for society as a whole

SECMP0056 will benefit society as a whole as it will mitigate potential risks of GDPR breaches. The purpose of the GDPR is to protect individuals' fundamental rights and freedoms, particularly their right to protection of their personal data. SECMP0056's implementation will ensure that Suppliers are taking the necessary steps to provide security to their customers.

Appendix 1: Progression timetable

The Modification Report will be presented to the SEC Panel. The modification will then proceed to Change Board for vote before the Authority makes its decision.

Timetable	
Event/Action	**Date**
Modification raised	5 Jul 2018
Modification discussed at Working Group	6 Aug 2018
Modification discussed at Working Group	17 Sep 2018
Preliminary Assessment requested	Feb 2019
Preliminary Assessment returned	23 Apr 2019
Modification discussed at Working Group	1 May 2019
Impact Assessment costs approved by Change Board	22 May 2019
Refinement Consultation	30 May – 20 Jun 2019
Impact Assessment requested	25 Jun 2019
Impact Assessment returned	20 Aug 2020
Modification Report approved by Panel	11 Sep 2020
Modification Report Consultation	14 Sep – 2 Oct 2020
Modification discussed at Working Group	7 Oct 2020
Change Board returns modification to Working Group	21 Oct 2020
Modification discussed at Working Group	2 Dec 2020
Second Refinement Consultation	14 Dec 2020 – 8 Jan 2021
Modification Report approved by Panel	12 Feb 2021

Timetable	
Event/Action	**Date**
Change Board Vote	24 Mar 2021
Authority decision (anticipated date)	30 Apr 2021

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	**Full term**
CHTS	Communications Hub Technical Specifications
CoT	Change of Tenancy
CoS	Change of Supplier
DCC	Data Communications Company
ECoS	Enduring Change of Supplier
ESME	Electricity Smart Metering Equipment
ESMETS	Electricity Smart Metering Equipment Technical Specifications
GBCS	Great Britain Companion Specification
GDPR	General Data Protection Regulation
GPF	Gas Proxy Function
HAN	Home Area Network
ICO	Information Commissioner's Office
IHD	In-Home Display
MRC	Modification Report Consultation
PIT	Pre-Integration Testing
PPMID	Prepayment Meter Interface Device
PPMIDTS	Prepayment Meter Interface Device Technical Specifications
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
TSAT	Technical Specification Applicability Tables
TSIRS	Technical Specification Issue Resolution Sub-Group