

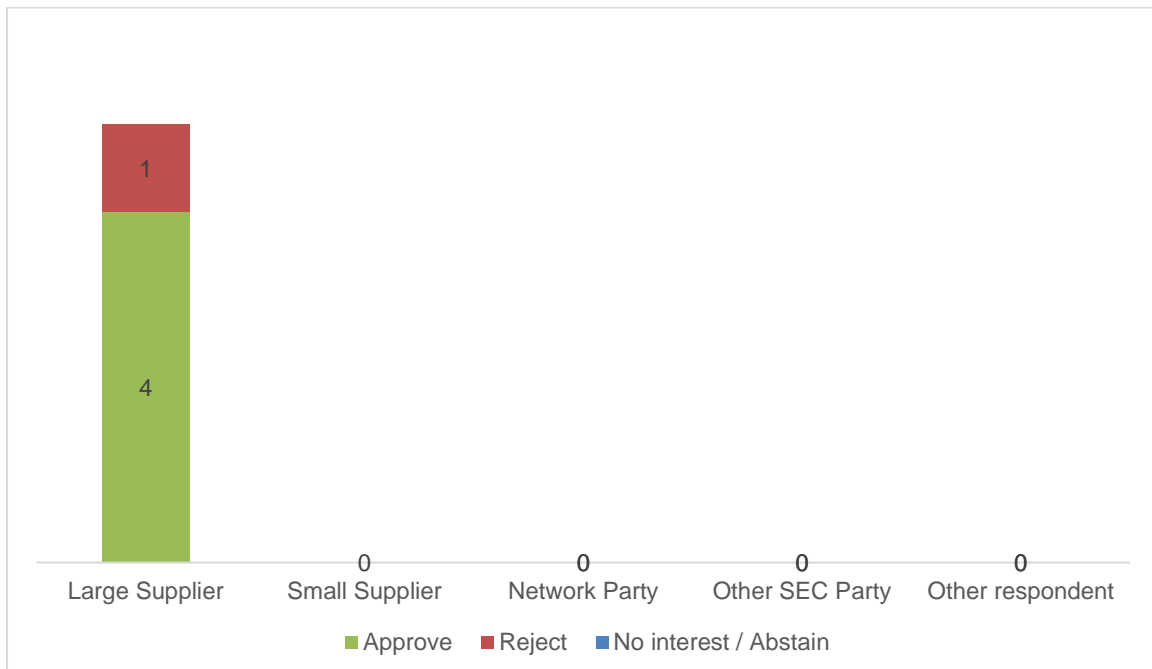
This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

SECMP0056 ‘IHD / PPMID ZigBee Attributes Available on the HAN’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the SECMP0056 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that SECMP0056 should be approved?

Question 1			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Reject	<p>We agree with the principle of this change, and that it should better facilitate SEC objective 'c' by enabling Consumers' private data to be protected where a Change of Tenancy has occurred, we are not able to support approval of this change at this time.</p> <p>As detailed further in our comments below we do not believe that there is sufficient information regarding the implementation of this change for the Change Board to be able to approve this change. We recommend that this is sent back to the Working Group to address the concerns we have noted regarding the device specifications and validity periods. We understand that this change is due to be discussed at the Working Group meeting on the 7th October.</p> <p>If this is not possible then we would look to reject this change rather than approve something without understanding the impacts of what that approval might mean in practice.</p>
E.ON	Large Supplier	Approve	We approve this modification as it supports the SEC objectives, creates alignment with SMETS1 requirements, and is a better customer journey.
Scottish Power	Large Supplier	Approve	GDPR requirements will be satisfied.
OVO	Large Supplier	Approve	<p>As raiser of the Proposal and the potential impacts surrounding non compliance in relation to GDPR, we feel the HUGE costs of implementing this are outweighed by the possible costs Suppliers may incur if they were found to be in breach by the Data rules. The reasons as to why we raised this Modification have not been resolved and need tackling.</p> <p>We should not have to measure a failure and the costs of not being compliant against costs that cannot be quantified within the DCC solution, but this is the position we find ourselves in. There is no ability to approve a Mod on the basis that it needs the costs challenged and</p>

Managed by

Question 1			
Respondent	Category	Response	Rationale
			hope that will be addressed under the precedent made by Ofgem in the work on SECMP0015 when it comes to their determination.
Utilita	Large Supplier	Approve	Better facilitates SEC Objectives a) “efficient provision, installation, and operation, as well as interoperability”, c) “facilitate Energy Consumers’ management of their use of electricity and gas through the provision to them of appropriate information”, and f) “ensure the protection of Data and the security of Data and Systems in the operation of this Code”.

Question 2: Please provide any benefits you anticipate as a result of the implementation of this modification.

Question 2		
Respondent	Category	Comments
EDF	Large Supplier	As noted above the key benefit that will result from the implementation of this modification is the protection of private data where a Change of Tenancy has occurred. As noted in our response to the Refinement consultation we remain concerned about the level of cost and whether this is proportionate to the data protection risk that exists. It is not clear whether any advice has been sought, for example from the ICO, to seek confirmation that the extent and impact of this risk justifies the costs noted in the report.
E.ON	Large Supplier	Benefits are in line with our Question 1 response.
Scottish Power	Large Supplier	GDPR requirements will be satisfied.
OVO	Large Supplier	Unfortunately, all the benefits relate directly to ensuring the overall solution does not allow any Device being built to not, inadvertently, disclose data of a sensitive and personal nature. These attributes exist in SMETS1 but, for some reason not clearly defined in the overall technical solution, have been omitted in SMETS2. This is looking to address that inconsistency.
Utilita	Large Supplier	Key benefits include: <ul style="list-style-type: none"> • mitigates against GDPR related risks; and • provides the new tenant with appropriate, relevant information for them to manage their own energy consumption.

Question 3: Please provide any further comments you may have

Question 3		
Respondent	Category	Comments
EDF	Large Supplier	<p>We require additional clarity on which versions of the Technical Specifications these changes will be included in. The Modification Report notes that:</p> <p>“This modification will be implemented in the latest versions of the Technical Specifications issued at the relevant SEC Release. This is likely to be minor versions (0.n) of each specification.”</p> <p>It is not clear from the Modification Report which versions of SMETS will need to be updated. Will it be the case that changes will be made all extant versions of SMETS2 and GBCS to create a new minor version that includes these changes, or will changes only be made to the more recent versions of the Technical Specifications, and if so, which ones?</p> <p>If new minor versions of the Technical Specifications are being created then we would assume that Suppliers would be required to upgrade their Devices to those new versions, as that is the point of having minor versions. Is this the case, and if so is there any indication as to how and when any changes to the Installation and Maintenance Validity Periods in the Technical Specification Applicability Tables would be made? It is worth noting that any changes to end date the Validity Periods for versions of the PPMID specifications that do not support the capability to support firmware upgrades will mean that those Devices will become non-compliant.</p> <p>While we agree that this seems to be a necessary change to make given the impact on data privacy, there are a number of critical outstanding questions regarding how this change will be implemented, which could have a significant impact on the costs and benefits of this change.</p> <p>Given the lack of detail regarding the implementation of this change we would recommend that this is not voted on by the Change Board but is sent back to the Working Group on the 7th October to ensure that these details are included in the Modification Report before it is voted on.</p>

Question 3		
Respondent	Category	Comments
E.ON	Large Supplier	Supportive of this modification progressing, but would like E.ON's comments to the refinement consultation legal drafting considered for future implementation.
Scottish Power	Large Supplier	While we believe SECMP0056 to be necessary, at almost £3m to implement, we are once again very unhappy at the projected costs from the DCC. We would urge both the SEC Panel, and Ofgem, to press the DCC for full disclosure on the drivers behind these costs. The costs in the FIA are all summarised into one line, and it is not clear how the benefits line up with the details of the implementation.
OVO	Large Supplier	None that have not already been noted.
Utilita	Large Supplier	No further comments.