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SECMP0056 ‘IHD / PPMID Zigbee Attributes Available on the HAN’ Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation.

Summary of conclusions

Modification Report Consultation

Five responses were received to the Modification Report Consultation (MRC). Four believed the modification should be approved. They considered the modification better facilitated SEC Objectives (a)¹, (c)² and (f)³. One believed the modification should be rejected.

¹ Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain

² Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems

³ Ensure the protection of data and the security of data and systems in the operation of the SEC

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Modification Report Consultation responses

Summary of responses

Four respondents felt that the modification should be approved. They cited that the modification better facilitates SEC Objective (a) as the modification will result in a more efficient provision, installation and operation of the Smart Metering Program, as well as SEC Objective (c) as the Consumers' private data will now feature a higher level of protection. This is also relevant for SEC Objective (f).

One respondent felt that the Device should clear Top-Up history and information regarding Debt Recovery in addition to historic consumption data and Supplier messages. The latter two are already stated in the proposed legal text. These suggested additions were investigated by SECAS and discussed with the respondent and the Proposer. It was agreed that the Home Area Network (HAN) Devices that the respondent is referring to had added functionality additional to the requirements stated in the Smart Metering Equipment Technical Specifications (SMETS). As a result, it cannot be stated in the SEC that these should be removed.

The one respondent who believed the modification should be rejected cited reasons due to the implementation approach stated in the Modification Report. They raised concerns that it is unclear which versions of the Technical Specifications this modification will be implemented in.

SECAS responded to the Large Supplier and also addressed this point at the October 2020 SEC Working Group. This modification has been targeted for implementation in the November 2021 SEC Release, and so SECAS expects the following changes to the Technical Specifications:

| Expected Technical Specification changes | | | |
|--|--|------------------------------------|---|
| Technical Specification | Version expected to be live at the time of implementation | Proposed change | Rationale |
| SMETS (ESME) | SMETS 29 November 2020 ESMETS v5.0 | SMETS 4 November 2021 ESMETS v5.1 | Since OTA firmware upgrades are possible to the EMSE, SECAS proposes this should be a change to the sub-version |
| SMETS (GSME) | No change (change will be to GPF which is reflected in CHTS) | n/a | n/a |
| SMETS (IHD*) | SMETS 29 November 2020 IHDTs v4.2 | SMETS 4 November 2021 IHDTs v5.0 | SECAS proposes a principal version change as this is a change in functionality |
| SMETS (PPMID**) | SMETS 29 November 2020 PPMIDTS v4.2 | SMETS 4 November 2021 PPMIDTS v5.0 | SECAS proposes a principal version change as this is a change in functionality |
| GBCS | GBCS v4.0 GBCS v3.2 | GBCS v5.0 | SECAS proposes a principal version change as this is a change in functionality |
| CHTS | CHTS v1.4 | CHTS v1.5 | Since OTA firmware upgrades are possible to the Communications Hub, SECAS proposes this should be a change to the sub-version |

** Firmware upgrades to IHDs are not possible; IHDs are also out of scope for [SECMP0007 'Firmware updates to IHDs and PPMIDs'](#).*

***Although SECMP0007, if implemented will bring in the ability to carry out firmware upgrades over the Air, IHD and PPMID Devices that are currently in the field will not have this functionality and therefore cannot be upgraded.*

The specific version numbers may change as the targeted implementation is 13 months away and so the versions live at the time of implementation may change during the lead time.

Subsequent Working Group discussions

A further Working Group was held to discuss the costs of this modification. A Working Group member highlighted their response to the MRC where they feel that 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 the SMETS to be displayed on the PPMID; however, the Working Group member felt that they were. 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 HAN Devices they were utilising had functionality additional to the requirements stated in SMETS and therefore this would be a matter for the Supplier and its Device Manufacturer.

SECAS provided a breakdown of the implementation cost of £2,949,147. It was agreed that a higher level of transparency under DCC Assessment costs is needed. The DCC responded that the majority of the cost is to pay for stringent testing by the Service Providers as inaccurate testing has occurred previously. SEC modification costs are currently being discussed in other forums to better understand how each part of a modification is costed.

The Working Group discussed the business case of the modification to assess the validity of the high costs. 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 if a Device Manufacturer does not have the relevant Zigbee CoT attributes, it will still be the Supplier that is held accountable for any potential breach in GDPR.

Recommended next steps

SECAS notes the recent discussions on ensuring the costs and business case for modifications are fully scrutinised prior to decision. SECAS is recommending that the vote on this modification be deferred for one month. During this time, it will be requesting further feedback from SEC Parties regarding the business case of this modification and further information on the rationale behind the DCC implementation costs. This information will be provided to the Change Board to support its recommendation to the Authority.