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# DP145

# 'Align SEC Documentation with DCC Solution for SR8.3 Decommission Device'

## Modification Report

**Version 0.2**

**17 November 2020**

Corporate member of Plain English Campaign
Committed to clearer communication
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## About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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## Contact

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# 1. Summary

This proposal has been raised by Chun Chen from the Data Communications Company (DCC).

Currently Smart Energy Code (SEC) Sections A 'Definitions and Interpretation' and H 'DCC Services' conflict with the DCC design for Service Request (SR) 8.3 (Decommission Device). As it stands, a Communications Hub which forms part of a Smart Metering System (SMS) can only be removed and returned by a Responsible Supplier Party. If an SR8.3 is sent to decommission the Communications Hub it will is no longer be part of an SMS, and it no longer has a Responsible Supplier as per its definition in SEC Section A, and which leads to further contradictions in SEC Section H.

# 2. Issue

## What are the current arrangements?

Any eligible Supplier Party registered in either the Import Supplier or the Gas Supplier User Role can decommission a Communications Hub that does not have any Electricity Smart Metering Equipment (ESME) or Gas Smart Metering Equipment (GSME) Devices associated with it by sending an SR8.3. This is designed to support Supplier Parties in two scenarios:

### Scenario 1 – Faulty Communications Hub

If a Communications Hub is commissioned by the installer on site but the installer failed to add a meter to the Communications Hub device log using SR8.11 'Update Home Area Network (HAN) Device Log', no meter point association would be given. In this situation, the Supplier Party is expected to use SR8.3 to decommission the Communications Hub before returning it to the DCC.

### Scenario 2 – Removal of a meter and the Communications Hub from consumer premises

In this scenario, both the meter and Communications Hub are commissioned, but the Supplier Party wishes to remove both from consumer's premises. In this case, the Supplier Party's current business process is to remove the meter from the Communications Hub Device log first, and then decommission the meter. This process will remove the meter point association for the Communications Hub. The Supplier will decommission the Communications Hub using SR8.3 as the final step.

In both scenarios, the current DCC design will support the Supplier Party's business process to decommission a Communications Hub, even when the Communications Hub never had, or currently does not have, any ESME or GSME Devices associated with it.

### What is the issue?

What is currently written in SEC Sections A and H conflicts with this DCC design. The exact areas are detailed below:

- SEC Section A defines a Responsible Supplier as '*in respect of a Smart Metering System (or any Device forming, or intended to form, part of a Smart Metering System) which relates to:*
    - *(a) an MPAN, the Import Supplier for that Smart Metering System; and/or*
    - *(b) an MPRN, the Gas Supplier for that Smart Metering System.*'

  As the Communications Hub is not part of the SMS, this means that a Communications Hub would have no Responsible Supplier in this situation.
- SEC Section H6.2 states that '*Only the Responsible Supplier(s) for a Communications Hub Function, Smart Meter, Gas Proxy Function or Type 1 Device may Decommission such a Device*'. Due to the issue outlined above in SEC Section A, there would not be a Responsible Supplier for the Communications Hub. This means the Communications Hub would not be able to be decommissioned.
- SEC Section H6.3 states that '*Where a Responsible Supplier (or, in the case of a SMETS1 CHF, the Lead Supplier) becomes aware that a Device has been uninstalled and/or is no longer operating, that User shall send a Service Request requesting that it is Decommissioned'*. This means the Supplier Party will not be an eligible User to send the SR8.3 to decommission the Device. It also contradicts a joint User and DCC requirement to follow the Service Request Processing Document as stated in Section H4.2 where *'Each User and the DCC shall each comply with the applicable obligations set out in the Service Request Processing Document concerning the secure processing of the communications required to be sent via the DCC User Interface'*.

### What is the impact this is having?

Without a clarification, the SEC would remain misaligned with the current working practices. Both the DCC and SEC Parties are currently following these processes correctly, so a clarification to the SEC would be less intrusive and impactful than any changes made to the existing process to keep the SEC unchanged.

## 3. Assessment of the proposal

### Observations on the issue

**CSC**

The Change Sub Committee (CSC) agreed with the issue raised and believed that this wouldn't constitute any material changes. Rather, members considered it is likely to be an amendment in the SEC to ensure that a Responsible Supplier can decommission and return a Communications Hub from a SMS.

**Panel Sub-Committees**

The Panel Sub-Committees had the following input on the Draft Proposal:

- The Technical Architecture and Business Architecture Sub Committee (TABASC), the Security Sub-Committee (SSC) and the Operations Group all confirmed that they have an interest in the Draft Proposal. SECAS will provide updates and seek further input once the proposal enters the Refinement Process. The following Sub Committees will be provided with the suggested wording for the Proposed Solution to clarify the definition for a 'Responsible Supplier' in SEC Section A prior to the Refinement Consultation being issued so that the Modification Report can note their observations to the consultation respondents.
- The Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) confirmed that it has no interest in the Draft Proposal.

## Appendix 1: Progression timetable

The Draft Proposal will be returned to the CSC on 24 November 2020 with the recommendation for it to be converted to a Modification Proposal and proceed to the Refinement Process. If the Panel agrees at its meeting on 11 December 2020, the discussed wording for the Proposed Solution will take place between the Proposer and SECAS. It will then be taken to the January 2021 Working Group meeting for discussion before being issued for Refinement Consultation. If no negative comments are received, the Modification Proposal will be brought to the Panel in February 2021.

| Timetable | |
|---|---|
| **Event/Action** | **Date** |
| Draft Proposal raised | 14 Oct 2020 |
| Presented to CSC for initial comment | 27 Oct 2020 |
| Sub Committee input sought | 5 Nov – 13 Nov 2020 |
| Presented to CSC for final comment and recommendations | 24 Nov 2020 |
| Panel converts Draft Proposal to Modification Proposal | 11 Dec 2020 |
| Modification Presented to Operations Group | 5 Jan 2021 |
| Modification discussed with Working Group | 6 Jan 2021 |
| Modification presented to TABASC for comment | 7 Jan 2021 |
| Modification presented to SSC for comment | 13 Jan 2021 |
| Refinement Consultation | 14 Jan 2021 – 3 Feb 2021 |
| Modification Report approved by Panel | 12 Feb 2021 |
| Modification Report Consultation | 15 Feb 2021 – 5 Mar 2021 |
| Change Board vote | 24 Mar 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** |
| CHF | Communications Hub function |
| CSC | Change Sub Committee |
| DCC | Data Communications Company |
| ESME | Electricity Smart Metering Equipment |
| GSME | Gas Smart Metering Equipment |
| HAN | Home Area Network |
| MPAN | Meter Point Administration Number |
| MPRN | Meter Point Reference Number |
| SEC | Smart Energy Code |
| SMKI PMA | Smart Metering Key Infrastructure Policy Management Authority |
| SMS | Smart Metering System |
| SR | Service Request |
| SSC | Security Sub Committee |
| TABASC | Technical Architecture and Business Architecture Sub Committee |