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SECMP0056 'IHD / PPMID Zigbee Attributes Available on the HAN'

October 2020 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Bradley Baker	SECAS
Joe Hehir	SECAS
David Walsh	DCC
Sasha Townsend	DCC
Simon Trivella	British Gas
Lynne Hargrave	Calvin Capital
Ali Raza	EDF Energy
Alex Hurcombe	EDF Energy
Julie Geary	E.ON
Ferenc Vanhoutte	Geo Together
Elias Hanna	Landis & Gyr
Emslie Law	SSE/OVO
Mahfuzar Rahman	Scottish Power
Eric Taylor	SLS
Matthew Alexander	SSEN
Rachel Norberg	Utilita
Gemma Slaney	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified by SECMP0056, the Proposed Solution, the DCC Impact Assessment and the Modification Report Consultation responses.

Issue:

- Under SMETS2 CoT ZigBee attribute not available on IHDs and PPMIDs
- New occupiers can access previous occupiers' data
- Clear breach of General Data Protection Regulation

Proposed Solution:

- To make Zigbee attributes for CoT parameters available to SMETS2 HAN Devices such as IHDs and PPMIDs. Mandate IHDs and PPMIDs to query the ESME and GPF for CoT information

DCC Impact Assessment:

- Proposed lead time of 11 months
- Implementation cost of £2,949,147 which differs from the DCC Preliminary Assessment implementation cost of £1,309,000.

Modification Report Consultation:

- Five responses, four to approve and one to reject
- Three respondents concerned about implementation costs
- Queries regarding Technical Specifications and implementation

Working Group discussions

SECAS summarised the issue identified by the Proposer. Further detail was given relating to the impact this issue has on the Consumer. It was highlighted that as Suppliers will not be providing an adequate level of protection to their customers, the customer journey and relationship with the Supplier is slightly damaged.

SECAS provided information on the Proposed Solution where the intention is to make Zigbee attributes for Change of Tenancy (CoT) parameters available for SMETS2 Home Area Network (HAN) Devices such as In-Home Displays (IHDs) and Pre-Payment Meter Interface Devices (PPMIDs). Also IHDs and PPMIDs will be mandated to query the Electricity Smart Metering Equipment (ESME) and Gas Proxy Function (GPF) for CoT information.

A Working Group member highlighted their response to the Modification Report Consultation (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 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 will be investigated and discussed offline with the SECAS Tech Ops team..

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 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.

SECAS addressed an MRC respondent's comments relating to which version of the Technical Specifications this modification will be implemented in, if approved. This modification is targeted for the November 2021 SEC Release. As a result, this modification will be included in the Technical

Specifications that go live at the time of this release. This modification will not be retrospectively implemented into previous versions of the Technical Specifications. If the modification does not get approved in time for the November 2021 SEC Release, it will be deferred to the November 2022 SEC Release, providing there is no Technical Specifications uplift in between.

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 their 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.

SECAS will investigate the comments received relating to the Technical Specifications before presenting the modification for recommendation to the Change Board. This modification will then be taken to the Authority for decision.

Next Steps

The following actions were recorded from the meeting:

- SECAS to investigate Technical Specifications queries with relevant Working Group members and Tech Ops team
- SECAS to seek further feedback relating to the business case
- SECAS to present modification to SEC Change Board