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Paper Reference:	SECP_87_1112_18
Action:	For Decision

SEC Modification Progression

1. Purpose

This paper sets out the Draft Proposals and Modification Proposals that are ready to proceed to the next stage of the framework and our recommendations to the Panel on how each should be taken forward.

2. Recommendations

This table lists our recommendations for each Draft Proposal and Modification Proposal.

Full details of each proposal can be found in the attached draft Modification Reports.

Proposal	Recommendations
MP092 'New Planned Maintenance methodology'	<ul style="list-style-type: none"> • AGREE that MP092 should be progressed to the Report Phase; • APPROVE the Modification Report; • APPROVE the implementation approach; and • AGREE that MP092 should be progressed as a Self-Governance Modification.
MP106 'CHISM update for Unknown WAN Variant'	<ul style="list-style-type: none"> • AGREE that MP106 should be progressed to the Report Phase; • APPROVE the Modification Report; • APPROVE the implementation approach; and • AGREE that MP106 should be progressed as a Self-Governance Modification.
MP139 'MVP and IVP dates for CHTS'	<ul style="list-style-type: none"> • AGREE that MP139 should be progressed to the Report Phase; • APPROVE the Modification Report; • APPROVE the implementation approach; and • AGREE that MP139 should be progressed as a Self-Governance Modification.

Proposal	Recommendations
DP144 'Charging of Random Sample Privacy Assessments'	<ul style="list-style-type: none"> • AGREE that DP144 should be converted to a Modification Proposal; • AGREE that MP144 should be progressed to the Refinement Process; and • AGREE the first package of work and the timetable for this.

3. Points to note

MP139

There is an ongoing security risk assessment for this modification. The Proposed Solution is to extend the Installation Validity Period (IVP) and Maintenance Validity Period (MVP) dates for Communications Hub Technical Specifications (CHTS) versions. This will allow continued installation of older Communications Hubs that have not been installed due to social distancing guidelines and the delays with the DCC's firmware rollout. The Security Sub-Committee (SSC) is aware that newer versions of firmware contain upgrades to security issues which will not be in the older Communications Hub firmware.

However, the SSC agreed that the risk assessment was more to do with managing any ongoing risks that the assessment identifies. Due to the time pressures on this modification we are issuing the draft Modification Report to the Panel as part of Panel Paper Day. The SSC is due to review the results of the assessment on 9 December 2020, two days before the Panel meets. If a serious problem is identified, we will inform the Panel and amend our recommendations accordingly.

Ali Beard

SECAS Team

4 December 2020

Attachments:

- **Appendix A:** MP092 draft Modification Report
- **Appendix B:** MP106 draft Modification Report
- **Appendix C:** MP139 draft Modification Report
- **Appendix D:** DP144 draft Modification Report

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MP092 'New Planned Maintenance Methodology'

Modification Report

Version 0.3

4 December 2020



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.

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This document also has four annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the full Data Communications Company (DCC) Preliminary Assessment response.
- **Annex C** contains the full responses received to the Refinement Consultation.
- **Annex D** contains the results of the trial that were presented to the Operations Group in December 2020.

Contact

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1. Summary

This proposal has been raised by Darren Robbins from the DCC.

In February 2019, the DCC noted to the SEC Panel that the method for delivering Planned Maintenance releases was sub-optimum. The Panel agreed to a derogation of existing SEC conditions to allow the DCC to trial a new approach regarding the delivery of Planned Maintenance. The results of the trial were presented to the Operations Group (OPSG) in November 2019 where it agreed the changes were an improvement. The SEC Panel subsequently granted an extension of the derogation for the Planned Maintenance trial to allow for the changes to be made to the SEC.

The new approach focused on how to differentiate between a High or Low Impact maintenance period. In order to fully assess changes and to ensure that the correct maintenance window is selected, the DCC used a Change Risk Calculator. The risk methodology involves core services, customer impact, complexity and downtime. It also amended the timings with which Planned Maintenance was scheduled and implemented.

The DCC confirmed there are no DCC System change costs required to implement this change following the trial. All SEC Parties will be impacted by this modification as the timings for Planned Maintenance will change. As this does not impact DCC Systems, implementation cost is limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort. If approved, this modification will be implemented in the February 2021 SEC Release. This is a Self-Governance modification.

2. Issue

What are the current arrangements?

In February 2019, the DCC noted to the SEC Panel that the method for delivering Planned Maintenance releases was sub-optimum. As such it wished to move to a risk-based approach to help deliver Planned Maintenance releases more efficiently.

Whilst the SEC is silent on the methodology for scoping Planned Maintenance, it does set out when the Maintenance should occur and the timescales around publishing Maintenance schedules (Sections H8.3 and H8.4).

SEC Section H8.3 sets out that the DCC may only undertake Planned Maintenance between 20.00 hours and 08.00 hours, and that the duration of Planned Maintenance should not exceed six hours in any given month. Furthermore, Section H8.4 states the DCC must provide a schedule of Planned Maintenance at least 20 Working Days prior to the start of each month that the Planned Maintenance is due to occur.

Trial of a proposed new approach to Planned Maintenance

In 2019, the DCC began consideration of a revised approach to managing Planned Maintenance. Part of the new approach required amendments to existing rules of when the DCC was to produce a schedule of Planned Maintenance changes and at what times of day such changes should be

implemented. The DCC therefore requested the Panel grant it a derogation to these rules whilst a six-month trial on the new methodology was carried out.

The Panel agreed to a derogation of existing SEC conditions until November 2019¹ on the condition that the DCC first present an updated Forward Schedule of Change (FSC) to the OPSG and that clarity was provided over some of the terminology used. Following discussions at the OPSG a trial of the new Planned Maintenance approach began on 1 April 2019

Conclusions of the DCC trial

At the October 2019 Panel meeting, the DCC noted the trial was coming to an end and had proved a success, a view supported by feedback at the July 2019 OPSG meeting. The DCC requested an extension to the derogation whilst full results of the trial were presented to the OPSG in October and November 2019² and a resulting Modification Proposal to introduce the new approach could be raised.

The Panel initially granted a further three-month extension until February 2020 whilst the OPSG discussed the results and a modification could be initiated. The SEC Panel then approved the trial period to an enduring period, until such a time where the New Maintenance Methodology was implemented through this SEC Modification³.

In July 2020, the DCC presented to the OPSG the overall strategy and approach of the New Maintenance Methodology measured alongside the objectives (described in Section 3). The DCC also presented the risk calculator used in its methodology to determine whether a change was a High or Low Impact change.

Latest results

In December 2020, the DCC presented further results of the trial to the OPSG measured against the objectives of the new maintenance methodology.

- There has been increased visibility of changes. The DCC provided evidence in February 2019 that there was only 32 changes on the FSC, whereas by 23 November 2020, there was 3,986 changes visible on the FSC.
- There has also been a massive increase in volumes of changes deployed across the DCC network. From July 2019 to July 2020 2,456 changes had been successfully deployed.
- The DCC highlighted that change success rates have been going up consistently since the start of the planned maintenance trial (May 2019).
- The DCC did note changes fail sometimes. 104 failures have occurred since 2019, with 19 of them causing significant impact. This means that more than 80% of failed changes cause minimal or no impact to the Service. This is due to rigorous run-book reviews, checkpoints and challenges. The DCC ensures formal lessons learned and actions are taken to address any changes failures.

Further details can be found in Annex D.

¹ OPSG_26_0511

² SECP_74_1511

³ SECP_76_1701

What is the issue?

The issue is the Planned Maintenance methodology currently set out in the SEC does not differentiate the specific services, nor the business impact of changes. As there is no differentiation between Low or High impacts, this created a lack of inefficiency across maintenance as smaller changes that need to be implemented were not approached as effectively as for larger changes. The lack of differentiation has several impacts:

- Low impact changes are considered in the same way as complex or high-risk changes. For example, downtime on the Self-Service Interface (SSI) is treated in the same manner as Core Communication Services. The business impact and risks associated with these examples are very different.
- Notice periods are the same regardless of overall business impact. This results in unnecessary delays on Low impact, low risk changes.
- The existing lead times also result in significantly extended deployment times on changes. Any alterations to scheduled changes result in significant delays.
- With the specific constraint on downtime and with no differentiation on the impact of change on Users, the result is that very large numbers of changes, both high and low in impact, are implemented in a single change window. This increases complexity and risk, whilst simultaneously constraining the DCC's ability to deliver key changes in a timely manner.
- With a focus on downtime, the result can be that high risk or complex changes where no disruption to the Services is anticipated are not classed as Planned Maintenance and therefore do not get included in the forward schedule of change.

What is the impact this is having?

The impact of not changing the current arrangements is DCC would have to combine all changes into one window, adding unnecessary complexity into the release window. Combining all changes in one window would present inefficiency across DCC processes and wider industry.

Many of the changes included in the Maintenance windows are designed to resolve business and operational issues that impact the overall quality of DCC Services, as well as there being many changes specifically requested by the industry as enablers to their business.

3. Solution

Proposed Solution

The DCC is proposing implementing the new methodology on an enduring basis, to allow more low impact changes to be implemented more of the time and allow more focus on fewer high impact changes.

The aim of these changes are to:

- improve the visibility of changes;

- improve quality of changes;
- improve the throughput of changes aligned to demand;
- maintain focus on limiting downtime on high impact changes; and
- focus on business impact not just downtime.

The solution aims to improve visibility of changes to SEC Parties, improve quality of changes deployed, improve alignment to demand and focus on business impact rather than solely focusing on the amount of downtime. This requires update to the SEC to create the concept of High and Low Impact Maintenance windows and detailing the outage duration associated with each.

DCC Methodology

The new risk-based methodology developed to determine whether the category of the maintenance is High or Low Impact is based on the impact to 'core' services. If a change will impact a core service and thereby restrict a User's ability to send Service Requests it is considered High Impact; if it does not it is considered Low Impact.

This new DCC methodology proposes the introduction of two High Impact and up to six Low Impact Planned Maintenance windows per month. Whilst the Planned Maintenance would continue to take place between 20:00 and 08:00 hours (as per Section H8.3) each Low Impact Planned Maintenance window would have a maximum duration of six hours and High Impact Planned Maintenance would have a total maximum duration of six hours calculated across both windows. High Impact changes would have a minimum lead time of 20 Working Days and Low Impact changes a minimum lead time of 10 Working Days.

Notifying Users of Planned Maintenance

The DCC will continue to publish the schedule of Planned Maintenance (as per Section H8.4) and issue an email notification to all Parties 20 Working Days ahead of the month in which Planned Maintenance will occur. This notification will set out when the scheduled windows are for High Impact and Low Impact changes and provide high level information on what Parties should expect in each window. If additional Low Impact Planned Maintenance windows are required beyond this notice, a revised notice will be issued to Parties.

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

SEC Party Categories impacted			
✓	Other SEC Parties	✓	DCC

While Parties will not be directly impacted in implementing this modification, Maintenance on DCC Systems affects all SEC Parties as above. Whilst the Maintenance affects DCC Systems there are no changes to DCC Systems, only to the maintenance of them and the corresponding downtime. All Parties will be affected by DCC System downtime.

Four of the six respondents to the Refinement Consultation noted that there will be impacts on their organisations. One Large Supplier stated that whilst there are positives in the new methodology, there is still an impact on their organisation by certain systems being down when those changes impact their customers. Another Large Supplier also stated the impact on its business would be consequences to prepayment consumers, consequences to installation and commission and costs to Suppliers.

DCC System

There are no overall impacts on the DCC System in this modification but contract changes with the Communication Service Providers (CSPs) are required.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Section H 'DCC Services'
- Appendix AL 'SMETS1 Transition and Migration Approach Document'

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

Consumers

From a consumer perspective, there is unlikely to be any impact, as this modification still limits consumer impacting changes to one outage window per month.

A Large Supplier in the Refinement Consultation outlined there may be detrimental impact on consumers who have a prepayment meter as they will not have their top up credited to their meter. This runs the risk of added consumer contact or loss of confidence in their smart meter. The DCC responded by stating this is not correct and the outage limit for maintenance which impacts prepayment activities remains at six hours.

The respondent also added concerns of costs to Suppliers to try and manage the ensuing messaging to customers at times of material risk. The DCC responded noting there should be no need to message customers during Low Impact maintenance as smart meter functions will not be impacted.

Other industry Codes

This modification has no impact on other industry Codes.

Greenhouse gas emissions

This modification has no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no costs on the DCC to implement this modification,

Initially it was believed that this modification would require DCC System changes and a Preliminary Assessment was undertaken. However, upon further investigation and negotiation the DCC confirmed no costs would be incurred and no Impact Assessment required.

More information can be found in the DCC Preliminary Assessment response in Annex B.

SECAS costs

The estimated SECAS 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

Two SEC Parties in the Refinement Consultation stated that there would be costs incurred on their business. One respondent stated that the change posed a risk to consumers with a prepayment meter, specifically in situations where downtime affects the consumer's inability to top up their meter. The SEC Party stated their business would have to manage the consumer's expectations, which may lead to compensating the consumer. No costs were provided from any respondent.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **25 February 2021** (February 2021 SEC Release) if a decision to approve is received on or before 11 February 2021; or
- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received after 11 February 2021 but on or before 10 June 2021.

This is a document only change and it has no impact on DCC Systems; it is simply aligning the SEC to the current DCC processes which are being used in the trial. Contractual changes between the

DCC and the CSPs are required, but do not affect the implementation lead time of this modification. The February 2021 SEC Release is the earliest SEC Release this modification could be included in.

7. Assessment of the proposal

Observations on the issue

The DCC presented to the OPSG the final output of the trial. The DCC concluded that the findings had been positive, and the trial had been a success. The DCC believed the new approach should be taken forward on an enduring basis by amending the current SEC provisions.

The Change Sub-Committee (CSC) understood the issue and noted the support for this change from OPSG members.

Solution development

DCC Methodology Development

Initially the DCC developed a new risk-based methodology to determine whether the category of the maintenance was High or Low Impact. This methodology involved multiple factors and assessment of core services, customer impact, complexity and downtime.

The methodology determined High Impact vs Low Impact by assessing:

- **Critical (Core) or non-critical service being impacted**
Core services include anything affecting end-to-end communications between Service Users and Communications Hubs, Installation & Commission activities and previously scheduled Smart Metering Equipment Technical Specifications 1 (SMETS1) migrations.
- **Consumer Impacting or non-consumer impacting**
For instance, resolving issues that are preventing Prepayment or Pay As You Go (PAYG) customers topping up
- **Complex or easy**
High Complexity requires multiple technical teams to implement the change, teams from different organisations and/or changes with no track record (one of a kind). Low complexity are all other changes, including changes with a single supplier and often a single team, a simple repeatable change, or slightly more complex changes that are proven and repeatable.
- **Downtime or no downtime**
Downtime refers to whether the planned maintenance spans less or more than 10 minutes

How the Calculator works

Core Service

Core Services affected were given a score of 4, non-core services a score of 1 (this is referred to as service value in the calculator). Core services included anything affecting end-to-end communications

between Service Users and Communications Hubs, Installation and Commission activities and previously scheduled SMETS1 migrations.

Service	Caluculator	Service	Caluculator
DUIS	4	OI / OT	1
DUIS1	4	SSI	1
DUIS2	4	SSMI	1
DUIS3	4	Remedy	1
Motorway	4	Orchestration	1
SMART M2M	4	Coverage Checker	1
Comms Hub Manager	4		
Security Validator	4		
Share Point	4		
DCO Application	4		

Consumer affecting

Consumer affecting changes were given a score of 10; non-consumer affecting changes a score of 0

Downtime

Changes with a downtime of greater than 10 minutes were given a multiplier of 5; those with a downtime of less than 10 minutes a multiplier of 1

Complexity

High complexity changes were given a multiplier of 5; Low complexity change a multiplier of 2

o High complexity:
▪ Multiple technical teams required to implement the Change
▪ Teams from different organisations required to support the Change
▪ Detailed Changes with no track record (1 of a kind Changes)
o Low complexity:
▪ All other Changes not attributed to "High Complexity". Examples are:
• Changes contained within a single supplier, typically a single team
• A simple repeatable Change
• Slightly more complex Changes that are proven, repeatable, possibly automated and well-practiced
• Typically, single team implementation

Calculator

The individual variables would be summarised as below:

Core Service	Customer Affecting	Low Complexity	Downtime Greater than (>)10 mins
	4	10 x 2	x 5
None Core Service	None Customer Affecting	High Complexity	Downtime Less than (<)10 mins (caters for Failovers)
	1	0 x 5	x 1

This table shows how a number of different changes may be categorised and their lead times

Service Value	Customer Affecting	Complexity	Downtime	Total Score	Lead time
1	0	2	1	2	10WD
1	0	2	5	10	10WD
1	10	2	1	110	20WD
1	10	2	5	110	20WD
1	10	5	5	110	20WD
4	10	2	1	140	20WD
4	10	5	5	140	20WD

Following feedback from Users the DCC then amended this to a simpler method. Users continued to be concerned with any change that affected their business ability to send end to end communications. Therefore, the DCC changed the methodology to place any changes impacting the core services in a High Impact window, and changes not affecting core services in Low Impact windows. This has been operating for the last six months, and is the Proposed Solution set out in Section 3 above.

Could this change impact Prepayment customers?

One Large Supplier responding to the Refinement Consultation noted that it could not support the Proposed Solution for various reasons that it felt presented risks to consumers. It stated its key concerns were around a lack of rationale for the timing and windows proposed; extending the time allowed for planned maintenance from four hours to six hours (limited only to SSI) all month.

The DCC advised the amount of six hours remains the same for core services outage, and the amount of time allowed for SSI goes from four hours to a potential amount of 36 hours. However, prior to the modification, there has been a large amount of work done to improve the SSI over the trial period which has often used more than six hours per month.

The Large Supplier further presented its concerns that any outage, at any time, impacts prepayment meter customers because they top up at all times of the day and night. The DCC advised that any Low Impact maintenance will not disrupt the ability to perform prepayment top ups because the outage limit for maintenance which impact prepay activities remains at six hours.

The DCC further stated that it considers the risk to be minimal in that the extension is to Low Impact maintenance which does not disrupt the ability to apply top ups.

Another Large Supplier noted that whilst it agreed with the changes implemented in the modification, the commencement of any maintenance that affects DCC User Interface Specification (DUIS) should not be starting at 20:00 as this directly impacts Prepayment customers. The principle of any maintenance is that customer top up impact should be completely avoided. The respondent believed that this is not the case and those involved with implementing the planned maintenance do not consider this as a factor. This change does not mention this as a consideration at all and it should be. The DCC responded advising that whilst it understood the concern, the SEC indicates that Planned Maintenance can be carried out within the hours of 20:00 to 08:00. Changing the hours of maintenance is out of scope for this modification.

Has the impact on Users been considered?

A Large Supplier stated that although there are positives in the new methodology it does not consider User impacts and is focused on the DCC's ability to define impact. There is still an impact on its business by certain systems being down when those changes impact its customers. The DCC responded by stating the rationale behind creating High and Low Impact windows is directly based on User impact. High Impact maintenance impacts core services which have maximum User impact and this is why there is no increase on the six hours currently allowed by the SEC. The DCC recognises that Low Impact maintenance does also impact Users but has taken this approach in order to de-risk the activities that impact "core" services and to allow it to put through the necessary volume of changes. The DCC believes that not being able to implement change, because of lack of hours, would ultimately have a far greater impact on Users.

A Network Party also considered that there needs to be a mechanism for the DCC to capture within the Performance Measurement Report (PMR) any instances of Low Impact Maintenance which unexpectedly results in disruption of end-to-end communications between Users and Communication Hubs. The DCC responded advising this is out of scope for this modification. However, this could be considered as a change to the PMR in another modification.

How much notice would Users receive of Unplanned Maintenance?

One Working Group member queried Unplanned Maintenance and how much notice Users would receive in these cases. The DCC confirmed that it would set out the planned maintenance at the beginning of the year. Any additional maintenance would be considered 'unplanned' and there could be as much as two months' notice for this, although there would be a minimum of 10 days' notice. The only exception would be where unplanned maintenance was an emergency. In a true event of an emergency, there is no minimum lead time as such, however, this is dependent on the scenario. In the event of an emergency incident fix then a change can even be raised retrospectively, however, Service Users would be informed by a major incident management communication.

A question was also raised about consumer impacts, for instance anything that might affect Prepayment top ups and what monitoring would happen. The DCC stated that this would be monitored by the Technical Operations Centre (TOC) as part of its Business as Usual monitoring and reporting. In addition, maintenance that may affect consumers would be carried out where possible between 20:00 and 02:00 to reduce consumer impacts.

Legal text comments

A Refinement Consultation respondent noted the need for a minor clarification in the legal text. Their recommendation was that 'either direction' be added after '*Users and Communications Hub*' under the definition of Planned Maintenance in SEC Section A 'Definitions and Interpretations' for greater clarity. The Proposer agreed to the minor clarification to the legal text, and the updated description of 'High Impact Planned Maintenance' within the definition for 'Planned Maintenance' now reads:

- a) *High Impact Planned Maintenance where one or more of the following is disrupted;*
 - i. *end-to-end communications between Users and Communications Hubs in either direction;*
 - ii. *install & commission activities; or*
 - iii. *previously scheduled SMETS1 migrations.*

Another respondent also recommended that the removed clause of ‘or poses a Material Risk of disruption to’, not to be removed from the legal text.

Planned Maintenance: *means, in respect of a month, Maintenance of the DCC Systems planned prior to the start of that month which will disrupt, or poses a Material Risk of disruption to, the provision of these services ...*

The Proposer agreed that the definition should remain in the legal text, and this removed text has now been reinstated.

Are changes needed to Service Provider contracts?

The DCC initially believed that contractual changes would be required to fully deliver the solution, and a Preliminary Assessment was requested in November 2019 to assess this. The DCC’s response was not provided until June 2020.

Following discussions with the Working Group in July 2020, SECAS asked the DCC to confirm whether contractual changes were needed and, if so, whether an Impact Assessment was required to determine the costs of this. The DCC was not able to confirm this until November 2020, when it informed SECAS that any contractual changes required would not require associated costs to the industry to deliver MP092 and so no Impact Assessment was required. Following this, SECAS was able to present the Modification Report to the Panel.

Support for Change

The OPSG has been supportive of this change following the success reported by DCC during the derogation period. The Working Group was also supportive of this change following discussion of the solution and results of the trial period.

Six Parties responded to the Refinement Consultation: three Large Suppliers, one Small Supplier and two Network Parties. Five of the six respondents agreed with the Proposed Solution. One of the Large Suppliers did not agree due to its concerns noted above over the potential impact of this modification on consumers and in particular Prepayment customers.

One respondent noted that the Proposed Solution makes it easier for the DCC to manage maintenance releases and believed there would be less chance of service disruption to Users. The other respondents generally agreed with the solution overall and stated that it is an efficient improvement on the current arrangements around Planned Maintenance.

One Large Supplier had several concerns regarding the progression of the modification and required further clarity from the DCC. SECAS facilitated discussion between the DCC and the Supplier to clarify all the issues. The Large Supplier confirmed that all its concerns had been adequately addressed.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification will better facilitate SEC Objective (b)⁴ as the new Planned Maintenance methodology allows the DCC to better meet its licence obligations.

Industry views

Five of the six Refinement Consultation respondents agreed with the Proposer that this modification better facilitates SEC Objective (b) as it helps DCC to better meet its obligations and prioritise planned maintenance.

The other respondent disagreed that this modification better facilitates SEC Objective (b) as to work efficiently, the DCC should strive towards reducing downtime rather than changing its legal obligation of providing a reliable interface. The DCC responded noting it believe this modification will help plan and carry out maintenance more effectively, and that maintenance is required to keep the DCC Total System running efficiently.

Views against the consumer areas

This modification will provide benefits to consumers as the new maintenance methodology seeks to reduce maintenance downtime.

Improved safety and reliability

Refinement Consultation respondents were concerned that the modification did not address the impacts on consumers effectively. SECAS, in discussion with the DCC, was able to clarify that great consideration was given to the impacts on consumers under the trial period, and that the modification will have a neutral impact regarding reliability for consumers, as the modification presents no additional impacts to current arrangement around Planned Maintenance

Lower bills than would otherwise be the case

A Large Supplier also stated in the Refinement Consultation that the inability for prepay consumers to top up their prepayment meter due to downtime could lead to a negative impact on bills. The DCC was able to also able address this concern directly with the Large Supplier and this has been recorded in the discussion section above.

Reduced environmental damage

This modification has no impact in reducing environmental damage.

⁴ Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Improved quality of service

This modification could indirectly positively impact on improved quality of service by better ensuring the maintenance needed to keep the DCC infrastructure running efficiently can be efficiently scheduled.

Benefits for society as a whole

This modification has no impact on society as a whole.

Appendix 1: Progression timetable

This Modification will be presented to the SEC Panel on 11 December 2020. Once approved, a Modification Report Consultation will be issued.

Timetable	
Event/Action	Date
Draft Proposal raised	22 Oct 2019
Presented to CSC for decision	29 Oct 2019
Panel converts Draft Proposal to Modification Proposal	15 Nov 2019
Preliminary Assessment requested	18 Nov 2019
Preliminary Assessment returned	5 Jun 2020
Modification discussed with Working Group	1 Jul 2020
Refinement Consultation	20 Jul 2020 – 7 Aug 2020
SECAS asks DCC if Impact Assessment is required	4 Aug 2020
DCC confirmed no Impact Assessment is required	6 Nov 2020
Modification Report presented to Panel	11 Dec 2020
Modification Report Consultation	14 Dec 2020 – 8 Jan 2021
Change Board vote	20 Jan 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
CSC	Change Sub-Committee
DCC	Data Communications Company
DUIS	DCC User Interface Specification
FSC	Forward Schedule of Change

Glossary	
Acronym	Full term
OPSG	Operations Group Sub-Committee
PAYG	Pay As You Go
PMR	Performance Measurement Report
SSI	Self-Service Interface
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS1	Smart Metering Equipment Technical Specifications 1
TOC	Technical Operations Centre
WD	Working Day

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MP092 ‘New Planned Maintenance methodology’

Annex A

Legal text – version 0.3

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section A ‘Definitions and Interpretation’

These changes have been redlined against Section A version 9.0.

Amend Section A as follows:

Planned Maintenance

means, in respect of a month, Maintenance of the DCC Systems planned prior to the start of that month which will disrupt or poses a Material Risk of disruption to the provision of the services described in a) and b) below (and, where it will disrupt, or poses a Material Risk of disruption to, the provision of these services in relation to Devices associated with Communications Hubs, at least 100,000 Communications Hubs are affected). ~~and which will disrupt, or poses a Material Risk of disruption to, provision of the Services.~~
Planned Maintenance shall be categorised as:

a) High Impact Planned Maintenance where one or more of the following is disrupted:

- i. end-to-end communications between Users and Communications Hubs in either direction;
- ii. install & commission activities; or
- iii. previously scheduled SMETS1 migrations.

~~a)b)~~ Low Impact Planned Maintenance which will disrupt or poses a Material Risk of disruption to the provision of services, excluding those services set out in High Impact Planned Maintenance, and will not require changes to be made by Users except in cases where Service Improvements are being made to the SSL. (and, where it will disrupt, or poses a Material Risk of disruption to, the provision of the Services in relation to Devices associated with Communications Hubs, at least 100,000 Communications Hubs are affected).

Section H 'DCC Services'

These changes have been redlined against Section H version 9.0.

Amend Section H8 as follows:

H8. SERVICE MANAGEMENT, SELF-SERVICE INTERFACE AND SERVICE DESK

General

H8.1 The DCC shall provide the Services in a manner that is consistent with:

- (a) the Service Management Standards; or
- (b) any other methodology for service management identified by the DCC as being more cost efficient than the Service Management Standards, and which has been approved by the Panel for such purpose.

Maintenance of the DCC Systems

H8.2 The DCC shall (insofar as is reasonably practicable) undertake Maintenance of the DCC Systems in such a way as to avoid any disruption to the provision of the Services (or any part of them).

H8.3 Without prejudice to the generality of Section H8.2, the DCC shall (unless the Panel agrees otherwise and subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers):

(a) categorise Planned Maintenance changes into Low Impact Planned Maintenance or High Impact Planned Maintenance;

(a)(b) undertake Planned Maintenance of the DCC Systems only between 20.00 hours and 08.00 hours;

(b)(c) limit Planned Maintenance of the Self-Service Interface to no more than four hours in any month; limit High Impact Planned Maintenance of the DCC Systems generally to two windows which have a maximum total duration of six hours per month; and

(c)(d) limit Low Impact Planned Maintenance of the DCC Systems generally (including of the Self-Service Interface) to six windows per month of no more than six hours- each in any month.

H8.4 At least 20 Working Days prior to the start of each month, the DCC shall make available to Parties, to Registration Data Providers and to the Technical Architecture and Business Architecture Sub-Committee a schedule of the Planned Maintenance for that month (subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers). Such schedule shall set out (as a minimum) the following:

- (a) the proposed Maintenance activity (in reasonable detail);

- (b) the parts of the Services that will be disrupted (or in respect of which there is a Material Risk of disruption) during each such Maintenance activity;
- (c) the time and duration of each such Maintenance activity; and
- (d) any associated risk that may subsequently affect the return of normal Services.

H8.4A Where an additional Planned Maintenance is required beyond that set out pursuant to Section H8.4, the DCC shall revise and reissue the schedule of Planned Maintenance:

(a) at least 10 Working Days in advance of any additional Low Impact Planned Maintenance;
and

(b) at least 20 Working Days in advance of any additional High impact Planned Maintenance.

- H8.5 The Panel may (whether or not at the request of a Party and subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers) request that the DCC reschedules any Planned Maintenance set out in a monthly schedule provided pursuant to Section H8.4. In making any such request, the Panel shall provide the reasons for such request to the DCC in support of the request. The DCC will take all reasonable steps to accommodate any such request.
- H8.6 As soon as reasonably practicable after the DCC becomes aware of any Unplanned Maintenance, the DCC shall notify the Technical Architecture and Business Architecture Sub-Committee, Parties and (insofar as they are likely to be affected by such Unplanned Maintenance) Registration Data Providers of such Unplanned Maintenance (and shall provide information equivalent to that provided in respect of Planned Maintenance pursuant to Section H8.4).
- H8.7 During the period of any Planned Maintenance or Unplanned Maintenance, the DCC shall provide Parties and (insofar as they are likely to be affected by such maintenance) Registration Data Providers with details of its duration and the expected disruption to Services to the extent they differ from the information previously provided.

Appendix AL ‘SMETS1 Transition and Migration Approach Document’

These changes have been redlined against Appendix AL version 5.0.

Amend Appendix AL Section 3.1 (c) as follows:

(c) the definition of “Planned Maintenance” shall be replaced with the following:

Planned Maintenance	means, in respect of a month, Maintenance of the DCC Systems planned prior to the start of that month or, in the case of DCC Migration Systems, planned 10 Working Days prior to the start of the Maintenance, and which will disrupt, or poses a Material Risk of disruption to, <u>the</u> provision of the <u>S</u> Services. (and, where it will disrupt, or poses a Material Risk of disruption to, the provision of the Services in relation to Devices associated with Communications Hubs, at least 100,000 Communications Hubs are affected).
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SEC Modification Proposal, SECMP0092, DCC CR1268

Planned Maintenance Methodology

Preliminary Impact Assessment (PIA)

Version:	0.5
Date:	25th November, 2020
Author:	DCC
Classification:	DCC Public

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1 Document History

1.1 Revision History

Revision Date	Revision	Summary of Changes
01/06/2020	0.1	Initial version, internal DCC review
05/06/2020	0.25	Completed internal DCC review
25/11/2020	0.5	Revised costs to a zero cost, zero impact change

1.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	MP092 PA request form - DCC	SECAS	25/11/2019

References are shown in this format, [1].

1.3 Document Information

The Proposer for this Modification is Chris Thompson from DCC. The original proposal was submitted on 22nd October 2019.

The Preliminary Impact Assessment was requested of DCC on 2nd December 2019 and was submitted on 5th June 2020. Subsequent discussions between DCC and the Service Providers identified that there were no charges required or a Full Impact Assessment, related to this Modification.

The Business Requirements are included from document [1].

2 Context and Requirements

In this section, the context of the Modification, assumptions, and the requirements are stated.

The context, and issue statement, and requirements following have been provided by SECAS and the Proposer.

2.1 Context

In April 2019 the DCC began a trial of a new approach regarding the delivery of Planned Maintenance. The new approach sought to categorise planned changes as either low or high impact, based upon a risk-based methodology. It also amended the timings with which Planned Maintenance was scheduled and implemented.

Whilst the SEC is silent on the methodology for scoping Planned Maintenance, it does set out when the Maintenance should occur and the timescales around publishing Maintenance schedules (Sections H8.3 and H8.4). In order to trial the new approach, the SEC Panel granted the DCC a derogation against these provisions for six months (later extending for a further three months until February 2020). The Panel requested the DCC report on progress to the Operations Group.

In July, the DCC reported the trial had been a success and, following a final report to the Operations Group, raised a Modification Proposal to formalise the new approach.

2.2 Business Requirements for this Modification

This section contains the definitions, considerations and assumptions for each business requirement as provided by the Proposer and SECAS.

1.	DCC proposes that Planned Maintenance will be categorised into two types, ('a' and 'b') below so that the impact to Users can be appropriately managed: <ul style="list-style-type: none"> a. Low Impact Planned Maintenance changes b. High Impact Planned Maintenance changes
2.	DCC proposes the introduction of up to two High Impact and up to six Low Impact Planned Maintenance windows per month.
3.	DCC proposes that High Impact Planned Maintenance will have a total maximum duration of 6 hours calculated across both windows. Each Low Impact Planned Maintenance window will have a maximum duration of 6 hours.
4.	Planned Maintenance will continue to take place between 20:00 and 08:00 hours (as per Section H8.3).
5.	DCC will continue to publish the schedule of Planned Maintenance (as per Section H8.4) and issue an email notification to all Parties 20 Working Days ahead of the month in which Planned Maintenance will occur. This notification will set out when the scheduled windows are for High Impact and Low Impact changes and provide high level information on what Parties should expect in each window.

6.	If additional Low Impact Planned Maintenance windows are required beyond this notice, a revised notice will be issued to Parties.
7.	High Impact changes will have a minimum lead time of 20 Working Days and Low Impact changes a minimum lead time of 10 Working Days.
8.	The SEC will be updated to create the concept of High and Low Impact Maintenance windows and detailing the outage duration associated with each.
9.	<p>High Impact Planned Maintenance changes mean that one or more of the following is disrupted:</p> <ul style="list-style-type: none"> • End-to-end communications between Service Users and Comms Hubs • Install & Commission activities • Previously scheduled SMETS1 migrations
10.	Low Impact changes will not disrupt any of the activities described in point 9 and will not require changes to be made by Users except in cases where Service Improvements are being made to SSI.

3 Description of Impacts and Solution

3.1 DSP Impact

DSP assumes that the High Impact total duration of six hours per month and the Low Impact duration of six hours per event is for DSP only and is NOT shared between other SPs.

The DSP PIT team already carries out a number of Low Impact deployments a month which fit within the Low Impact duration.

No impacts on Security and Infrastructure are anticipated.

In terms of Service Impact, the only activity currently defined as High Impact Planned Maintenance is a major deployment. The Application Management team currently implements one major deployment a month, which fits within one High Impact Planned Maintenance six hour duration. It would not be possible to fit a second major deployment into the six hour duration allocated for High Impact Maintenance for a single month.

Whilst there is overall no impact on DSP of the High and Low impact durations and windows, this Modification does not impose time restrictions on the times of day and night when the changes can be made that are not already present in SEC and, indeed, in their contract. For the avoidance of doubt, DSP does not intend to change its contract with DCC in order to fully accommodate this Modification.

3.2 CSP North Impact

CSP North identified that there may be impacts on their Service and Operations teams. This may require changes to the following Contract Schedules:

- Schedule 1 – Definitions
- Schedule 2.1 - DCC Requirements
- Schedule 2.2 - Performance Measures
- Schedule 6.1 - Implementation Planning
- Schedule 7.1 - Charges and Payment

Schedule 2.2, under appendix 5 Outline Performance Monitoring Approach, Section 2, the DSMS is expected to be the data source for the calculation of PM10 (Planned Maintenance). Post implementation of this Modification the calculation of PM10 will need to take the category of Planned Maintenance into consideration as the requirements and Performance Measures will differ between the 'low' and 'high' cases. The DSMS as the source of the data for PM10 will need to be modified to collect and provide the category type for each Planned Maintenance request.

3.3 CSP South and Central

CSP South and Central have identified the following changes to the following Contract Schedules:

- Uplift Schedule 6.2 to reflect the proposed new Planned Maintenance Release rules

- Uplift Part F of Schedule 1 or 6.2 (Testing and Acceptance) to include the definition of having up to two (2) High Impact and up to six (6) Low impact Planned Maintenance windows per month.
- Uplift Part F 1 or Schedule 6.2 to include that High Impact Planned Maintenance will have a total maximum duration of six (6) hours calculated over both windows. Each Low impact Planned Maintenance window will have maximum duration of six (6) hours. (This means a total of up to forty-two (42) hours)
- Uplift Schedule 6.2 to include that Telefónica will comply to Planned Maintenance schedule which is 20:00 and 08:00 hours
- Uplift Schedule 6.2 to include that High Impact changes will have a minimum lead time of twenty (20) working days and Low impact changes a minimum lead time of ten (10) working days.

Several items for CSP South and Central have been listed in the Risks, Assumptions, Issues, and Dependencies listed in section 5 following.

3.4 Cap Gemini

Provided the assumptions outlined in section 7 are valid, then this change will have no measurable or chargeable impact to Capgemini's services.

4 Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal.

The Rough Order of Magnitude cost (ROM) shown below typically describes indicative costs to implement the functional requirements as assumed above. In the case of this Modification. As a result the final price may result in a variation.

4.1 Design, Build, and Testing Cost Impact

There is no overall impact to the DSP, and neither a FIA nor any charges will be incurred.

In the case of CSP North as well as CSP South and Central; there are no anticipated changes in terms of Design, Build, and PIT Test. Contract changes are not in the scope of this Modification, and will be negotiated separately by the CSPs and DCC.

£	Design, Build and Test
Planned Maintenance Methodology	£0

Based on the existing requirements, the Service Providers have agreed there is no change or charge required, and therefore, no Full Impact Assessment.

5 Risks, Assumptions, Issues, and Dependencies

In the following sections, Risks, Assumptions, Issues, and Dependencies have been identified.

It is possible that further RAID will be established as part of the Working Group reviews and the FIA.

5.1 Risks

No risks related to this Modification have been noted.

5.2 Assumptions

Ref.	Area	Description	Accept
MP92-AD01	High Impact Duration	The High Impact total duration of six hours per month and the Low Impact duration of six hours per event reflect the time available to DSP and are NOT totals shared between DSP and other SPs.	Accepted
MP92-AC02	Downtime	Capgemini assumes this Modification correlates to downtime, i.e., any change that requires an element of downtime to the Dual Control Organization (DCO) application will be categorised as a High Impact change, and any changes that do not require downtime will be categorised as low impact or standard changes. Any changes would only be high impact if they directly impacted previously scheduled (SMETS1) migrations.	Accepted
MP92-AC03	Environments	Capgemini assumes this change request is only relevant to production environments. Therefore UIT, SIT and other Dev/Test environments are not impacted by this change request.	Accepted
MP92-AC04	Release Management	Capgemini assumes that the Service Integrator processes for release management as well as the DCC Change management process are all aligned to this change.	Accepted
MP92-AT05	Environments	CSP South and Central will continue to manage their environment and adhere to internal governance to ensure the right amount of rigour to protect our services.	Accepted
MP92-AT06	Disruption	Assume that Low Impact changes will not disrupt any of the activities described in MP92-AT06 and will not require changes to be made by Users except in cases where Service Improvements are being made to SSI.	Accepted
MP92-AT07	SLAs	Requirements and changes detailed in this Modification will not impact the current agreed SLA and performance measures	Accepted
MP92-AT08	Slots	When a slot is removed due to SPP's or other activity, new slots must be considered for each Service Provider to ensure they can maintain service, avoid delays to critical downstream deployments etc. In this instance CSP South and Central assumes that DCC will agree another slot. This may require a further Project Request or Change request.	Accepted
MP92-AT09	Vendor Contracts	CSP South and Central assume that there is no uplift to our existing vendor contract with our suppliers. At any case this assumption is not correct and discovered during the IA stage, Telefónica reserves the right to include cost in our IA response	Accepted

MP92-AT10	Future Ownership	CSP South and Central assumes that DCC will continue to own and manage the Planned Maintenance Release methodology. Any changes to this document must be shared. CSP South and Central may require DCC to provide a Project Request or a Change request in order to manage this new requirement. CSP South and Central also reserves the right to review its solution and the charges associated with the Planned Maintenance Release methodology.	Accepted
MP92-AT11		CSP South and Central assumes that all the resource uplifts to support the following will be covered under a separate DCC CR: 1) Replicating changes into DSMS 2) New or additional reporting requirements in relation to the Forward Schedule.	Accepted

5.3 Issues

No risks related to this Modification have been noted.

5.4 Dependencies

Note that the following dependencies are understood by DCC and accepted,

Ref.	Organisation	Description	Recommended action
MP92-DT1	DCC	CSP South and Central are dependent on DCC in providing a forward view of change slots for a rolling 18-month period.	DCC to Identify all High slots in the agreed period.
MP92-DT2	DCC	To help all parties plan changes for the future, DCC to define the forecasting process and timelines at IA stage	To be covered in legal text
MP92-DT3	DCC, CSP South and Central	Based on a series of meetings with DCC regarding the ambiguity of the framework supplied by this Modification it was agreed that DCC and CSP South and Central will work together on a supplementary document that will allow each party to assess change in a much more accurate manner. This supplementary documentation must be in place before the FIA can be completed. This document must stay aligned with the Planned Maintenance Release methodology document at all times.	Closed. CSP South and Central have agreed that no charges will be associated with this change, and that the FIA will not be required.
MP92-DA4	DCC	All SPs are dependent on DCC to continue to publish the schedule of Planned Maintenance and issue an email notification to all Parties twenty (20) working days ahead of the month in which Planned Maintenance will occur. This notification will set out when the scheduled windows are for High and Low impact changes and provide high level information on what Parties should expect in each window.	Continue existing process
MP92-DA5	DCC	DCC to inform all SPs when any additional Low Impact Planned Maintenance windows are required beyond the agreed notice of ten	Continue existing process

		(10) days, a revised notice will be issued to Parties.	
MP92-DT6	DCC	CSP South and Central are dependent on the DCC to update SEC to create the concept of high and low impact maintenance windows and detailing the outage duration associated with each. Contract changes made as a result of this Modification will be misaligned with SEC until SEC has agreed and know the concept of high and low impact maintenance windows	Close. Is part of this Modification
MP92-DT7	DCC	<p>DCC to lead discussion and agree commercial vehicle to cover additional requirements which have resulted in resource uplifts with no commercial vehicle to date. DCC have requested CSP South and Central to remove these in scope items from this Modification and have confirmed DCC will facilitate discussion for a separate change to cover the below items which CSP South and Central is currently incurring cost for:</p> <ul style="list-style-type: none"> - Uplift resource profile to support the replication of CSP South and Central Smart Metering Operational changes onto DSMS that has been providing the DCC Change Management team the visibility of all changes that will impact or have the potential to impact the smart metering service. <p>This will help DCC meet the ISO accreditation standards which requires 'segregation of duties' as DCC change management no longer raise and approve the same change.</p>	Close. While CSP South and Central have absorbed this cost to date and have been requesting for DCC-L to raise a Change Request to cover this work. CSP South and Central have indicated no charges associated with this Modification will be applied.

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
DCC	Data Communications Company
DCO	Dual Control Organisation (Capgemini)
DSP	Data Service Provider
FIA	Full Impact Assessment
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SP	Service Provider
SR	Service Request
SRV	Service Request Variant
UIT	User Integration Testing

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MP092 ‘New Planned Maintenance methodology’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP092 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	Yes	<p>We agree the solution put forward subject to modified. Generally, speaking this modification should make it easier for the DCC to manage maintenance releases and mean less chance of service disruption to users. The Legal Text should clarify that planned maintenance should not impact end-to-end communications between Users and Devices – in either direction.</p> <p>Current legal text:</p> <p>a) High Impact Planned Maintenance where one or more of the following is disrupted;</p> <p>i. end-to-end communications between Users and Communications Hubs;</p> <p>ii. install & commission activities; or</p> <p>iii. previously scheduled SMETS1 migrations.</p> <p>Our proposed modified legal text underlined below would be:</p> <p>a) High Impact Planned Maintenance where one or more of the following is disrupted;</p> <p>i. end-to-end communications between Users and Communications Hubs in either direction;</p>	<p>This has now been added to the legal text</p>

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Question 1				
Respondent	Category	Response	Rationale	DCC Response
			<p>ii. install & commission activities; or</p> <p>iii. previously scheduled SMETS1 migrations.</p> <p>We would also suggest that there needs to be a mechanism for DCC to capture within the Performance Measurement Report (PMR) any instances of Low Impact Maintenance which unexpectedly results in disruption of end-to-end communications between Users and Communication Hub</p>	
Symbio Energy Ltd.	Small Supplier	Yes	Symbio Energy is fine with methodology for Planned Maintenance	
Western Power Distribution	Network Party	Yes	We agree with the proposed solution.	
Utilita	Large Supplier	No	<p>Utilita cannot support MP092 as a proposed solution. Utilita is predominantly a prepay supplier, and therefore cannot support a mod that carries a significant risk of restricting our customers' ability to top up their meters when needed. Although we understand the intention of introducing 'Low' and 'High' maintenance categories to illustrate the type of impact to services, we cannot agree with the proposed legal text changes in Section A 'Planned Maintenance' and H8.3 c and d, for the following reasons:</p> <p>1. Timing and windows proposed:</p>	<ul style="list-style-type: none"> The amount of 6 hours remains the same for "core" services outage. The amount of time allowed for SSI actually goes from 4 hours to a potential amount of 36 hours. However, even before this Modification was raised there has been a large amount of work done to improve SSI over the last two years which

Question 1				
Respondent	Category	Response	Rationale	DCC Response
			<p>- There is no clear rationale for extending the time allowed for planned maintenance by such a significant amount from 4 hrs (limited only to SSI) to 6hrs/month for all High Impact Maintenance = 50% increase; and other Maintenance from 6 hrs/month to Low Impact Maintenance 6 windows/month max 6 hrs each = 36 hours = 500% increase). In total, maximum of 6 hours rises to 42 hours. The trial outcomes do not clearly show the justification for such a significant increase in time allowed.</p> <p>- As a DCC user we want to see less outages. Any outage, at any time impacts prepay customers because they top up at all times of the day and night. This proposal is directly contrary to the desired direction of travel.</p> <p>2. Consequences of extending maintenance windows/timing on the associated costs of running DCC systems, i.e. compensation for downtime for DCC Users:</p> <p>- More downtime (planned and unplanned) will mean that there is increased risk of customers (potentially vulnerable) being unable to top up during these times, among other important activities.</p> <p>- Changing the legal text to allow for an increase in both the hours and windows of planned maintenance leaves our prepay customers exposed to additional risks of going off supply. This proposal could increase the risk of customers being affect by system</p>	<p>has often used more than 6 hours per month.</p> <ul style="list-style-type: none"> DCC believe that they do and SEC Ops Group agrees. DCC can provide the supporting material if required. <p>2.</p> <ul style="list-style-type: none"> DCC disagreed that any outage would affect prepayment customers at all times. This is because any low impact maintenance will not disrupt the ability to perform pre-pay top ups. The outage in this area remains at 6 hours. The extension applies to low impact, i.e. non-core, systems only. The risk is minimal in that the extension is to low impact maintenance which does not

Question 1				
Respondent	Category	Response	Rationale	DCC Response
			<p>downtime by a factor of 5 compared to pre-trial (current) windows/timings provided for under the SEC.</p> <p>- This proposal is going to have direct costs of managing consumer expectations and how “smart” their smart meter is. These costs are entirely borne by the supplier. This change is not equitable in it’s solution.</p> <p>3. Current drafting lacks transparency around the potential for disruptions of Low Impact Maintenance:</p> <p>- Although the legal text indicates low risk of disruption, SEC parties should be made aware of any potential risk of disruption associated with Low Impact Maintenance. We are given a notice period of 10 days for Low Impact Maintenance; from our perspective this is an indication that disruption is still possible. Therefore, a protocol should be included in the legal text, applicable in the case of system disruption caused by Low Impact Maintenance. The protocol must tell suppliers what type of disruption is to be expected.</p> <p>- The whole phrase ‘which will disrupt or poses a Material Risk of disruption’ must remain within the definition of Planned Maintenance. Removing the ‘or poses a Material Risk of disruption’ part as is proposed means that any maintenance which does not for certain “disrupt” the Services will be, by default, classified as Unplanned Maintenance. The text needs to cover the scenario where there is Planned Maintenance but with a risk (not certainty) of disruption.</p>	<p>disrupt the ability to apply top ups</p> <ul style="list-style-type: none"> The risk is minimal in that the extension is to low impact maintenance which does not disrupt the ability to apply top ups DCC stated they would like to see this evidence. Low impact maintenance will not disrupt smart meter functions. <p>3.</p> <ul style="list-style-type: none"> DCC have defined low impact by saying it could impact anything non-core. It would be extremely difficult to define all non-core components of the system and it would always be subject to change in any case This is only in cases where additional Low Impact windows are required in a month. In most cases a notice of 20 working days ahead of the month in

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Question 1				
Respondent	Category	Response	Rationale	DCC Response
			<p>4. Current drafting lacks a mechanism for DCC Users to challenge the DCC assumption of Low or High Impact:</p> <p>- We would like to see and understand how DCC defines success in recent trials of the Low/High Impact classification, especially conducted over the last few months. While there has been a report on the successes of the trial, we note this was conducted in 2019. There will inevitably continue to be increasing Maintenance (driven via various routes such as an increase in traffic). As such, while the report contents are useful, there needs to be a review of the successes in light of the changes in landscape. This should be included in the PA for SEC parties, so that we can fully assess if DCC's success measures agree with the views of DCC Users. Answers around the timing and windows for High and Low impact maintenance should be compared with information prior to the trial. Have these trials stayed within the windows as proposed in this mod?</p> <p>Therefore, until it is clear what the benefits for customers and SEC Parties are, we suggest this mod progresses no further.</p>	<p>which maintenance is happening will be provided</p> <ul style="list-style-type: none"> DCC believe this is already covered. It says DCC gives (as we do now) notice of Planned Maintenance 20 working days ahead of the month in which maintenance is occurring and the definition of Planned Maintenance has been changed to cover both high and low impact DCC understood the concern of the legal text. DCC proposed that the clause should be left in and DCC continue to operate as currently. <p>4.</p> <ul style="list-style-type: none"> The Modification specifies what may be impacted by High Impact maintenance (e2e comms, I&C or migrations). Low Impact is anything else. All of the maintenance windows are on the

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Question 1				
Respondent	Category	Response	Rationale	DCC Response
				<p>Forward Schedule of Change on SSI where Users can see what changes and releases are included in which window. If Users think something classed as Low should be High then they can contact DCC. We believe Users already have the means to challenge DCC without adding a further, formal process into the SEC.</p> <ul style="list-style-type: none"> • DCC has provided this information in Annex D. • DCC confirmed timings are the same
OVO	Large Supplier	Yes	Although we agree with the changes being implemented and have been involved in the trail that has been ongoing, we would like to flag that commencing any maintenance that affects DUIS should not be starting at 20.00 as this directly impacts Prepayment customers. This	DCC stated 'The SEC indicates that Planned Maintenance can be carried out within the hours of 2000 to 0800.

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Question 1				
Respondent	Category	Response	Rationale	DCC Response
			<p>has been notified to the DCC on numerous occasions and the principle of any maintenance is Customer top up impact should be completely avoided. This is not the case and those involved with implementing the planned maintenance do not consider this as a factor. This change does not mention this as a consideration at all and it should be. The manner of the solution is not the issue though.</p> <p>High Impact reflects end to end communications between Service Users and CHs. It does not factor the customer that may be making those communications and the purpose. So the continued commencement at 20.00 is 'sub optimum' to our customers.</p>	Changing the hours of maintenance is out of scope for this Modification'.
EDF	Large Supplier	Yes	We agree with the proposed solution. It sets out a more nuanced approach to Planned Maintenance which is more appropriate than the current arrangements set out in the SEC, as proven by the trial of the proposed new process.	

Question 2: Will there be any impact on your organisation to implement MP092?

Question 2				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	No comment	No comment	
Symbio Energy Ltd.	Small Supplier	No	-	
Western Power Distribution	Network Party	Yes	We will have a consistent and clear understanding of the types and times of maintenance that the DCC will undertake and will be better able to manage our systems and processes accordingly.	
Utilita	Large Supplier	Yes	<p>As mentioned in Question 1:</p> <p>Implementing MP092 will have further impacts:</p> <ol style="list-style-type: none"> Consequences to prepay consumers topping up, e.g. lack of top up capability during the Maintenance windows. This has a detrimental impact on prepay customers who will not have their top up credited to their meter. This runs the risk of customer contact or loss of confidence in their smart meter. Costs to suppliers to try and manage the ensuing messaging to customers at times of material risk, potentially on a 6-times a month basis when their meters will not be smart. This is made more difficult because DCC does not provide effective transparency of the likely risk or the level of disruption. Constantly having to message will have negative reputational, monetary, and logistical impacts on our business. 	<p>1. This is not correct. The outage limit for maintenance which impact prepay activities remains at 6 hours</p> <p>2. There should be no need to message customers during low impact maintenance as smart meter functions will not be impacted.</p>

Question 2				
Respondent	Category	Response	Rationale	DCC Response
			3. Consequences to installation and commission process – which also can have negative impacts on the consumer as another visit may need to be scheduled last minute;	3. As above. This is only impacted during high impact maintenance (and only then if something goes wrong and the maintenance activity overruns by hours). The outage limit remains at 6 hours
OVO	Large Supplier	Yes	Yes, although there are positives in the new methodology it does not consider User impacts and is focused on DCC ability to define impact. WE will still be impacted by certain systems being down when those changes impact our customers. This will not improve or address that.	The rationale behind creating high and low impact windows is directly based on User impact. High impact maintenance impacts core services which have maximum User impact and this is why there is no increase on the 6 hours currently allowed by SEC. DCC recognise that low impact maintenance does also impact Users but have taken this approach in order to de-risk the activities that impact “core” services and to allow us to put through the necessary volume of Changes. DCC believe that not being able to implement Change, because of lack of hours, would ultimately have a far greater impact on Users.
EDF	Large Supplier	No	The proposed solution maintains the amount of time for which the core systems/processes will not be available as a result of Planned	This assumption is correct

Question 2				
Respondent	Category	Response	Rationale	DCC Response
			Maintenance so there should be no impact on us as a result. This is, however, on the assumption that Planned Maintenance is assessed appropriately and that items designated as Low Impact Planned Maintenance will not disrupt core services.	

Question 3: Will your organisation incur any costs in implementing MP092?

Question 3				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	No comment	No comment	
Symbio Energy Ltd.	Small Supplier	No	-	
Western Power Distribution	Network Party	No	-	
Utilita	Large Supplier	Yes	<p>The effects of proposed legal text changes in H8.3 c and d. will have a detrimental impact to the consumers, especially prepay.</p> <p>There will also be a detrimental impact to Suppliers who must manage consumer expectations during these maintenance times.</p> <p>It is worth noting that MP109 proposes using the SSI as a standard means of communication, with up to 36 hours of planned maintenance windows per month which could impact the SSI; this modification makes subsequent mods, like MP109, significantly less attractive.</p>	<p>DCC disagree that the proposed legal text changes in H8.3 c and d. will have a detrimental impact to the consumers, especially prepay.</p> <p>There should be no need for extra comms during low impact maintenance as stated above</p> <p>Usage of the SSI, and any future changes to the SSI, will be planned around any maintenance windows. As stated above, we do not believe there would be 36 hours per month of maintenance on SSI.</p>

Question 3				
Respondent	Category	Response	Rationale	DCC Response
			As stated above DCC has not provided enough information to do a thorough Impact Assessment of costs.	
OVO	Large Supplier	No	As the issues causing us cost still remain, this will not incur further cost to us but will not remove costs on how we react to this work being done.	
EDF	Large Supplier	No	-	-

Question 4: Do you believe that MP092 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications	
Symbio Energy Ltd.	Small Supplier	Yes	This will help to prioritize the planned maintenance.	
Western Power Distribution	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (b) by enabling the DCC to better meet their licence obligations.	
Utilita	Large Supplier	No	SEC objective B states “efficiently discharge the other obligations imposed upon it by the DCC Licence”. To work efficiently, the DCC should strive towards reducing downtime rather than changing its legal obligation of providing a reliable interface.	We believe this Modification will help plan and carry out maintenance more effectively. Maintenance is required to keep the DCC Total System running efficiently.
OVO	Large Supplier	Yes	At the highest level, it meets SEC Objective (b).	
EDF	Large Supplier	Yes	We agree that M092 will better facilitate SEC Objective (b) as it will enable the DC to better meet their obligations around Planned Maintenance.	

Question 5: Noting the costs and benefits of this modification, do you believe MP092 should be approved?

Question 5				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications	
Symbio Energy Ltd.	Small Supplier	Yes	If planned maintenance help to avoid any disruption to the provision of the DCC services, then yes, the MP092 should be approved.	
Western Power Distribution	Network Party	Yes		
Utilita	Large Supplier	No	<p>We see no benefits if this was to be approved in its current state.</p> <p>Overall, MP092 increases the ability of the DCC to allocate Planned Maintenance periods from 6 hours to 42 hours; the associated risk of disruption thereby increases, too, which could be detrimental to consumers, especially prepay, compared to the current legal text and Maintenance window allowance pre-trial. In turn, this leads to cost and risk for Suppliers. Indeed, it is unclear what the benefits of progressing with the extension of Maintenance windows is.</p>	DCC stated they have responded to these points above.

Question 5				
Respondent	Category	Response	Rationale	DCC Response
			Whilst we see a rationale for splitting maintenance categories to High or Low impact if the justification for choosing either High or Low was always communicated clearly to DCC Users. However, there is no mechanism to challenge the decisions.	
OVO	Large Supplier	Yes	We do although we'd like DCC to address the customer impacts of the way they actually carry out planned maintenance.	The only material impact to consumers should be during high impact maintenance windows and, specifically, the disruption to e2e comms. Outage in this respect remains at 6 hours.
EDF	Large Supplier	Yes	-	-

Question 6: How long from the point of approval would your organisation need to implement MP092?

Question 6				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	No comment	No comment	
Symbio Energy Ltd.	Small Supplier	Within two months	We will identify the high and low impact areas. If there are any schedulers setup already within the Planned Maintenance time between 20:00 and 08:00 hours, we will change our systems schedulers. We will make sure the no service request will send during the maintenance time frame.	This only applies to high impact maintenance windows
Western Power Distribution	Network Party	N/A	-	-
Utilita	Large Supplier	N/A	-	-
OVO	Large Supplier	N/A	This is already in place. DCC are following this approach and we've adapted to it.	
EDF	Large Supplier	N/A	As the trial process is already in operation on an ongoing basis we would not need any lead time to implement this change.	

Question 7: Do you agree with the proposed implementation approach?

Question 7				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications	
Symbio Energy Ltd.	Small Supplier	Yes	Yes, Symbio Energy agree with the proposed implementation.	
Western Power Distribution	Network Party	Yes	-	-
Utilita	Large Supplier	No	For the reasons addressed in question 1	
OVO	Large Supplier	N/A	There is no approach to implementing this, it is already in place and only a document change. It is not possible to disagree with it.	
EDF	Large Supplier	Yes	We agree that this should be targeted for the February 2021 release; however it is disappointing that this can't be included in the November 2020 release.	

Question 8: Do you agree that the legal text will deliver MP092?

Question 8				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	Yes	Subject to our response to Q1 and our proposed modifications	
Symbio Energy Ltd.	Small Supplier	Yes	Yes, Symbio Energy agree with the legal text with current version of 2.0.	
Western Power Distribution	Network Party	No	We believe that the way that the legal text is drafted for defining a High Impact Planned Maintenance doesn't clearly allow for changes that might impact a User but without necessarily impacting install and commission or end to end communications. We believe that High Impact also needs to include any changes that will have an impact on the User.	This is the intention (with the exception of changes to SSI). We would welcome a review of the legal text to meet this concern.
Utilita	Large Supplier	We do not agree with the proposed solution for MP092.	In the legal text, the proposed changes in H8.3 c and d allow for hours of downtime to increase and more windows for planned maintenance. There is no protection for customers during these times and likelihood for unplanned maintenance to reduced is vacant in this modification. The proposed legal text 1. increases the windows and amount of maintenance allowed.	DCC stated they have responded to these points above

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Question 8				
Respondent	Category	Response	Rationale	DCC Response
			2. the amendment of the phrase “which will disrupt or poses a Material Risk of disruption” means that unless DCC are certain that the Maintenance will disrupt, they must classify the Maintenance as Unplanned. It can only be Planned if it "will" disrupt. This means DCC will have to classify Maintenance that may cause disruption as Unplanned (Please see question 5).	
OVO	Large Supplier	Yes	n/a	
EDF	Large Supplier	Yes	We have not identified any issues with the legal text.	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP092 is implemented?

Question 9				
Respondent	Category	Response	Rationale	DCC Response
Electricity North West Limited	Network Party	No comment	No comment	
Symbio Energy Ltd.	Small Supplier	No	-	
Western Power Distribution	Network Party	No Comment	-	-
Utilita	Large Supplier	Yes	Impact to consumers is negative as this is likely to lead to further system downtime (please see question 5 and 8). There is also little evidence this mod is needed to resolve any problem. Finally, there is no benefits given so it is unclear why this mod is being proposed.	DCC stated they have responded to these points above
OVO	Large Supplier	No	No, as this change is not looking to benefit consumers as the elements that impact them have not been considered. There is nothing in any of the Modification documentation considering that impact in how our customers behave being addressed. If they were there would be measures factoring that.	

Question 9				
Respondent	Category	Response	Rationale	DCC Response
EDF	Large Supplier	No	This change will not have a direct impact on consumers as the amount of potential 'down time' allowed within the SEC, which has a direct impact on consumers, will stay the same.	

Question 10: Please provide any further comments you may have

Question 10			
Respondent	Category	Comments	DCC Response
Electricity North West Limited	Network Party	No comment	
Symbio Energy Ltd.	Small Supplier	-	-
Western Power Distribution	Network Party	-	-
Utilita	Large Supplier	The risk for consumers (especially those that are PPM) has not been addressed transparently. In the modification report V0.2 it is says that “There is no additional impact on consumers than current arrangements, as none of the current arrangements for downtime has been amended” yet proposed changes to the legal text in H8.3 c and d would contradict this, as allowed downtime is increasing from the initial times highlighted in H8.3 (b) (if risky maintenance is not under scrutiny anymore, as mentioned above in Question 8). This impact should be clearly highlighted so that all SEC parties understand the potential implications of this Mod	DCC stated they have responded to these points above
OVO	Large Supplier	None.	

Question 10			
Respondent	Category	Comments	DCC Response
EDF	Large Supplier	-	-

Planned Maintenance Trial – Quarterly Update

**We believe in making Britain more connected,
so we can all lead smarter, greener lives.**

1 December 2020

DCC Public

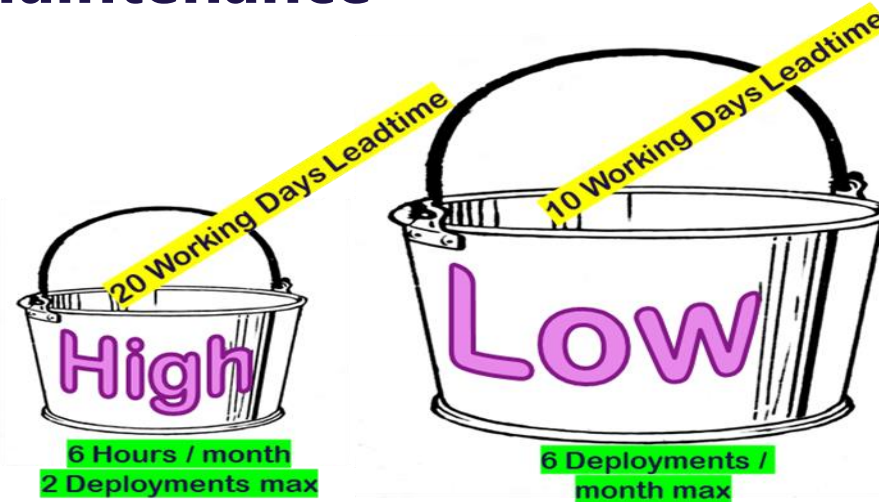
Agenda

1. The Approach and Objectives
2. Obj1 – To Improve Visibility of Changes to Customers
3. Obj2 – To Improve Quality of Changes deployed
4. Obj3 – To Improve the throughput aligned to demand
5. Obj4 – To focus on business impact not just downtime
6. Change Calculations for High and Low windows (as presented previously).



The Approach – Planned Maintenance

Split changes into 2 types



- Allow more LOW more of the time
- Enables more focus more on HIGH when they are deployed

- Determine High vs Low by assessing:
 - Critical or non-critical service being impacted
 - Customer Impacting or non-customer impacting
 - Complex or easy
 - Downtime or no downtime

Key Objectives: Visibility, Quality, Throughput,
Downtime & Business Impact

Objective 1: To Improve Visibility of Change

New Maintenance Slots

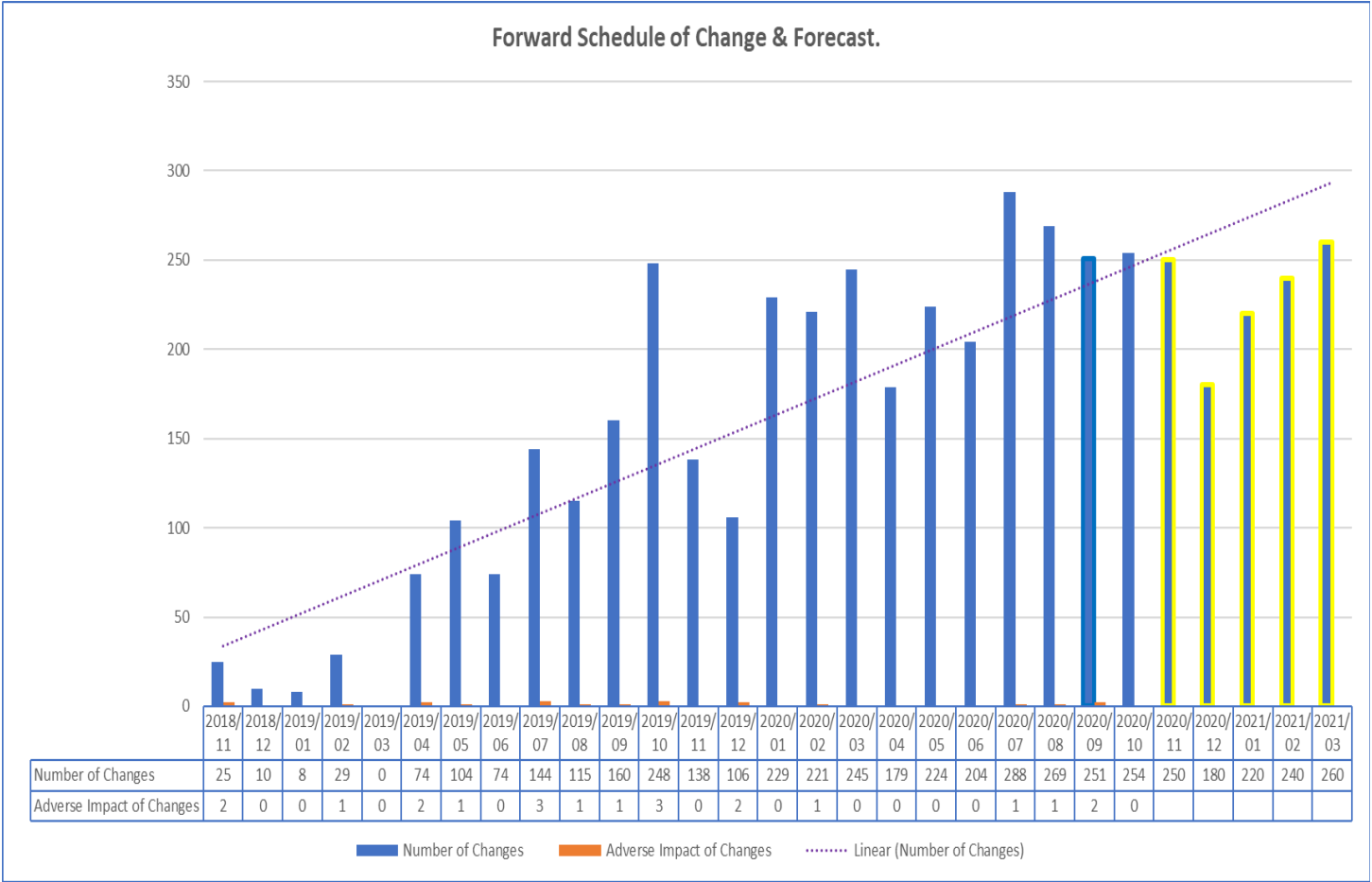
- Up to 6 Low-risk maintenance slots available each month.
- Up to 2 High-risk maintenance slots available each month (please note that the outages still counts as 6 hours)

Increased visibility of Changes

- As of the 23rd November 2020, now 3,986 changes that have appeared on the FSC

Volumes of Change – context

Massive increases in the volumes of changes have been seen across the DCC network, however, Normal Changes (which account for the planned outages in high impact windows and non-outage requests in low impact windows) have remained consistent, approx. 25 changes per month.



Objective2: To Improve Quality of Changes Deployed

Change Success Rates

Success rates have been going up consistently since the start of the planned maintenance trial.

Target >95%

Adverse Impact Rate

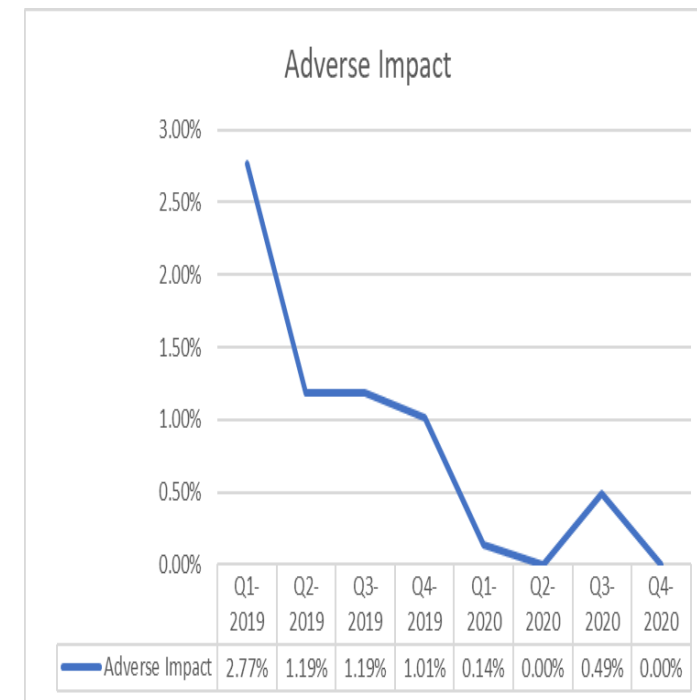
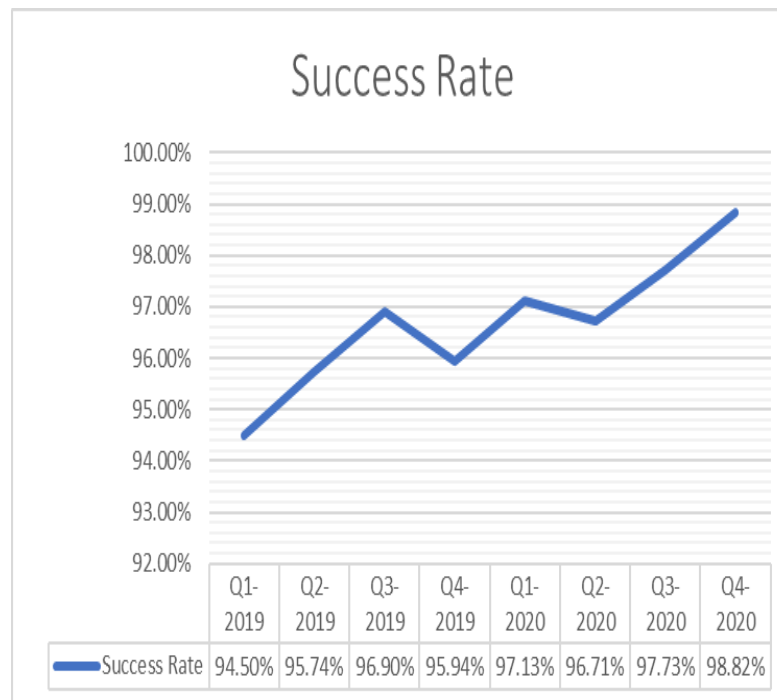
This calculates the number of changes which have caused a category1 or category 2 Incident.

Target <3%

Changes Fail Sometimes...

DCC ensures that a formal lessons learned and actions are assigned to address any change failures.

>80% of failed changes have cause no – or minimal impact to Service. This is due to rigorous run-book reviews, checkpoints and challenges.



Objective3-5 Updates

Objective3: To Improve the Throughput of Changes to Aligned Demand

New Maintenance Slots.

Up to 6 Low-risk maintenance slots available each month, currently actively, using 3 slots per month

Standard Changes

Hit 3.5% in May in 2019, this is enabling very quick operational non-impacting changes to take place. Averaging 30% Standard Changes per month, based on overall figures.

Objective 4: To maintain focus on limiting downtime on high impact changes

Limiting outage time as per SEC guidelines, protecting our Customers.

Objective 5: Focus on Business Impact not just Downtime

All change communications focus on impacted services.

Planned Maintenance High and Low Windows.

In order to ensure that the changes were correctly assigned into the appropriate windows during the initial stages of the planned maintenance trial, DCC developed a Change Risk Calculator to validate decisions being made and to ensure that releases were placed in the correct maintenance windows.

The calculation was as follows: **Service x Impact x Complexity x Downtime = RISK SCORE**

However, this has since been amended and adapted to simplify and reduce any potential errors in calculations.

The method used is very simple and ensures no mis-alignment of releases into Windows.

- If a change or release impacts Customers ability to send or receive Service Requests across the DCC network, then these are placed in **High Impact windows**.
- If a change or release does **NOT impact** the Customers ability to send/received Service Requests across the DCC network, then these are placed in **Low Impact windows**.

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MP106 'CHISM update for Unknown WAN Variant'

Modification Report

Version 0.5

4 December 2020

Corporate member of
Plain English Campaign
Committed to clearer
communication

592



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About this document

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

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This document has four annexes:

- **Annex A** contains the business requirements for the Proposed 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) Preliminary Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation

Contact

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

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1. Summary

This proposal was raised by Chun Chen from the DCC.

For a DCC User to obtain information about Smart Metering Wide Area Network (SM WAN) Coverage, they must send Service Request 12.1 'Request WAN Matrix'. The Data Service Provider (DSP) will then provide an Availability Date and WAN Variant in response. WAN Variants are listed in Table 3 of SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials (CHISM)' Annex E. In the exception case where the Availability Date for SM WAN Coverage is known, but the WAN Variant is not, with the implementation of SEC Modification [MP081 'Alignment of DUIS and CHISM to reflect current DCC Processing'](#), the DSP will return " " Space for the South and Central regions.

As a result of the agreed solution of MP081, the response " " Space has been highlighted as a potential cause of confusion for the Supplier.

Following the Refinement Consultation and discussions held at the SEC Working Group, the Proposed Solution is to make an addition to the legal text in SEC Appendix I which will provide guidance for DCC Users, stating that the " " Space response should be read as "Unknown". This is due to the high implementation costs stated in the DCC Preliminary Assessment to replace the " " Space response with "Unknown" via a DCC System change. It was agreed that providing guidance is more suitable when looking at the costs and benefits of the modification.

This change will not have any DCC System impacts and so will be limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort only, with minimal lead time. It will impact Large Suppliers and Small Suppliers and is targeted for the June 2021 SEC Release.

2. Issue

What are the current arrangements?

When a DCC User sends Service Request 12.1 'Request WAN Matrix' to receive information about SM WAN Coverage, in most cases they will receive an Availability Date and WAN Variant. However, in an exception case, the Communications Service Provider (CSP) for the South and Central regions may respond to a SM WAN Coverage request (CSPM-S1 or CSPM-S2) with an Availability Date for coverage but without being able to confirm the WAN Variant that will need to be used. On receipt of this data, the DSP returns the Availability Date and the value of the unconfirmed WAN Variant in the response to Service Request 12.1 'Request WAN Matrix'. The CSP North is not affected by this problem as this response is not available for this region.

The WAN variant returned by the DSP is defined by Table 3 in SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials' (CHISM) Annex E as below:

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
“ “ Space	“ “ Space	CSP South & Central

With the implementation of [MP081 'Alignment of DUIS and CHISM to reflect current DCC Processing'](#), “ “ Space will be used to indicate the unconfirmed WAN Variant for the CSP for South and Central regions.

During a User engagement design discussion, it was highlighted by a Supplier that the “ “ Space response would be confusing and Users would prefer a more meaningful response. It has been suggested that the wording to use is “Unknown”.

What is the issue?

The WAN Variant “ “ Space has been highlighted as being confusing to Users. A Large Supplier has commented that this response lacks meaning. A more suitable term should be used to identify the scenario where an Availability Date can be provided but the WAN Variant cannot. This affects South and Central regions only.

In order to provide the clarity required, Table 3 in CHISM Annex E should be amended.

What is the impact this is having?

As a result of the agreed solution of [MP081 'Alignment of DUIS and CHISM to reflect current DCC Processing'](#), Users send Service Request 12.1 'Request WAN Matrix' to check the SM WAN Coverage to obtain SM WAN coverage. “ “ Space is returned as the WAN variant in the exception case that an Availability Date for coverage is confirmed but the WAN Variant is not. This has been highlighted as a potential cause of confusion for the DCC User.

3. Solution

Proposed Solution

The Proposed Solution is to add guidance to SEC Appendix I 'CH Installation and Maintenance Support'. This addition to the legal text will clarify to DCC Users that the DSP response “ “ Space should be interpreted as “Unknown”.

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

As the Proposed Solution is to add guidance to SEC Appendix I 'CH Installation and Maintenance Support Materials' so that the DSP response of " " Space is read as "Unknown", there is no impact on any SEC Party Category.

DCC System

This SEC Modification will have no impact on DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Appendix I 'CH Installation and Maintenance Support Materials'

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

Consumers

This modification will have no impact on Consumers.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no anticipated DCC implementation costs.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

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

SEC Party costs

There will be no SEC Party costs.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **24 June 2021** (June 2021 SEC Release) if a decision to approve is received before 3 June 2021; or
- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received after 3 June 2021 but on or before 21 October 2021.

Following the expected date of the Change Board's decision, the earliest release this modification can be implemented in is the June 2021 SEC Release. If, however, the modification is approved after 3 June 2021, the modification will be implemented in the next possible release, the November 2021 SEC Release.

7. Assessment of the proposal

Observations on the issue

CSC members were supportive of the proposal and felt that the issue was well defined. The proposal was also presented to the other SEC Sub-Committees. Each SEC Sub-Committee was happy for the proposal to progress and provided no further comments on the issue.

Solution development

Originally, the wording change for the unconfirmed WAN Variant to “Unknown” was suggested by a DCC User during a User engagement design discussion. The Proposed Solution was to replace the DSP response “ “ Space with “Unknown”. Business requirements were agreed by the Proposer (see Annex A) and a Preliminary Assessment performed.

However, this was costed at £150,000 up to the end of Pre-Integration Testing (PIT) in the DCC Preliminary Assessment (see Annex C). This was deemed too expensive for what appeared to be a minor change and the DCC was challenged to explain the costs. The DCC explained that there would need to be numerous changes to the CSP for South and Central regions’ systems. As part of the design changes, the DSP would also have needed to make amendments to documentation. The DCC also advised that due to the short turnaround time (15 Working Days), Service Providers had to estimate costs broadly before refining them further under the DCC Impact Assessment. Working Group members stated that they want to see more transparency in modification costs moving forwards.

It was highlighted by Refinement Consultation respondents and agreed by the Working Group members that the business case was dramatically reduced because of the costs involved. It was proposed that adding guidance following Table 3 of CHISM would be sufficient, as the scale of the issue is not yet fully understood due to MP081 not yet being implemented.

The Working Group agreed with the non DCC System impacting solution and felt it should be progressed. The Proposer agreed and acknowledged that due to the high costs of the original Proposed Solution something simpler and less expensive should be progressed. A Working Group member queried if this solution would still require a modification. The DCC confirmed the guidance would be added to SEC Appendix I. As this forms a SEC Subsidiary Document a modification is still needed to amend it.

Although the Change Board had initially approved the costs of the Impact Assessment (£19,480), due to the change to the Proposed Solution, the DCC Impact Assessment was not required and so was not requested.

Support for Change

Working Group

The Working Group was supportive of the amended Proposed Solution, believing it to be the most cost-effective approach to resolving the identified issue. It did not believe there would be sufficient benefits to justify the cost of changing the DCC Systems to report “Unknown” instead of “ “ Space.

Refinement consultation

The three Refinement Consultation respondents felt the original Proposed Solution of amending the DSP response incurred too high a cost and suggested that providing guidance would be more cost-effective. Once this was discussed at the Working Group, the Proposer agreed that this was the best way forward.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification better facilitates SEC Objectives (a)¹, (c)² and (g)³. This is because the Proposed Solution will give a better indication of the scenario where the WAN Variant is unknown, making it clear to Suppliers of the situation. This modification will add further clarity to the SEC by removing potential confusion when a User requests SM WAN coverage.

Industry views

SECAS received three responses to the Refinement Consultation and each respondent raised concern regarding the implementation costs. Issues have arisen surrounding the business case as the relatively small amendment has such a high associated cost. However, two of the respondents did agree with the Proposer that the original solution would have better facilitated SEC Objectives (a) and (g).

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on the safety and reliability of the smart metering systems.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the cost of energy bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will provide a positive impact on the quality of service as the Proposed Solution removes the margin for confusion for Suppliers when they receive the DSP response “ “ Space, allowing them to action next steps sooner and address connectivity issues more efficiently.

Benefits for society as a whole

This modification will have a neutral impact regarding benefits for society as a whole.

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 Facilitate the efficient and transparent administration and implementation of the SEC.

Appendix 1: Progression timetable

This modification will now be presented to Panel with the recommendation it be issued for Modification Report Consultation, followed by the Change Board vote under Self-Governance.

Timetable	
Event/Action	Date
Draft Proposal raised	30 Dec 2019
Presented to CSC for final comment and recommendations	28 Jan 2020
Panel converts Draft Proposal to Modification Proposal	14 Feb 2020
Business requirements developed with Proposer and DCC	Feb 2020
Preliminary Assessment requested	26 Mar 2020
Preliminary Assessment returned	11 Jun 2020
Discuss at the July Working Group meeting	1 Jul 2020
Refinement Consultation	8 Jul 2020 – 29 Jul 2020
Impact Assessment costs approved by Change Board	22 Jul 20
Modification discussed at Working Group	7 Oct 20
Legal text amended	Oct 20
Modification Report approved by Panel	11 Dec 20
Modification Report Consultation	14 Dec 20 – 6 Jan 21
Change Board Vote	20 Jan 21

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
CHISM	Communications Hub Installation and Maintenance Support Materials
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SM WAN	Smart Metering Wide Area Network
WAN	Wide Area Network

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MP106 ‘CHISM update for Unknown WAN Variant’

Annex A

Business requirements – version 0.2

About this document

This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The DCC will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	To amend the response in the case of an unconfirmed WAN Variant in the South and Central regions from “ “ Space to “Unknown”
2	Once amendment is made, “Unknown” response to be implemented for the WAN Coverage File provided by CSP South and CSP Central

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 Requirement 1: To amend the response in the case of an unconfirmed WAN Variant in the South and Central regions from “ “ Space to “Unknown”

During a User engagement design discussion, it has been highlighted by a customer that the “ “ Space response in the case of an unconfirmed WAN Variant (in the South and Central regions) is confusing and that a more meaningful response would be preferred. It has been suggested that the wording to use is “Unknown”. Table 3 in Smart Energy Code (SEC) Appendix I ‘Communications Hub Installation and Maintenance Support Materials’ (CHISM) below shows the responses the User may receive from the Data Communications Company (DCC).

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
“ “ Space	“ “ Space	CSP South & Central

2.2 Requirement 2: Once the amendment is made to SEC Appendix I, “Unknown” response to be implemented for the WAN Coverage File provided by CSP South and CSP Central

The WAN Coverage File is produced by the Communications Service Provider (CSP) for the South and Central regions. The WAN Coverage File is not a SEC Document, however the amendment of the response should also be implemented for consistency.

3. Glossary

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

Glossary	
Acronym	Full term
CHISM	Communications Hub Installation and Maintenance Support Materials
DCC	Data Communications Company
DSP	Data Service Provider
SEC	Smart Energy Code
WAN	Wide Area Network

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MP106 'CHISM update for Unknown WAN Variant'

Annex B

Legal text – version 0.2

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

These changes have been drafted against SEC Version 16.0.

Appendix I ‘CH Installation and Maintenance Support Materials’

Amend the following to CHISM Annex E3

E.3 Communications Hub WAN Variant Values

- E3.1 For the purpose of providing WAN Technology values for use with the 12.1 RequestWANMatrix Service Request as detailed in APPENDIX AD ‘DCC User Interface Specification’, Communications Hub WAN Variant values are listed in table 3

Table 3; Summary of all Communications Hub WAN Variants for use with Service Request 12.1

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South & Central
Cellular+Mesh	Cellular+Mesh	CSP South & Central
No Coverage Intended	No Coverage Intended	N/A
“ “ Space	“ “ Space	CSP South & Central

To note: on Table 3, “ “ Space above, CSP South & Central will respond to a SMWAN Coverage request (CSPM- S1 or CSPM-S2) with an Availability Date for coverage but without confirming the WAN Variant that will need to be used. Upon receipt of this WAN Variant, the Service User will read “ “ Space as WAN Variant unknown.

SEC Modification Proposal, SECMP0106, DCC CR1335

CHISM¹ Update for Unknown WAN² Variant Preliminary Impact Assessment (PIA)

Version:	0.2
Date:	11th June, 2020
Author:	DCC
Classification:	DCC PUBLIC

¹ Communications Hub Support Materials (CHISM)

² Wide Area Network (WAN)

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1 Document History

1.1 Revision History

Revision Date	Revision	Summary of Changes
09/06/2020	0.1	Initial version
10/06/2020	0.2	Internal DCC reviews complete

1.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	MP106 Business-Requirements v0.1	SECAS	03/04/2020
2	MP106 Preliminary Assessment Request	SECAS	03/04/2020

References are shown in this format, [1].

1.3 Document Information

The Proposer for this Modification is Chun Chen of SmartDCC. The original proposal was submitted on the 30th December 2019.

The Preliminary Impact Assessment was requested of DCC on 6th April 2020.

2 Context and Requirements

In this section, the context of the Modification and the requirements are stated. These have been provided by SECAS and the Proposer.

2.1 Context

For a DCC User to obtain a Smart Metering Wide Area Network (SM WAN) Coverage, they must send Service Request 12.1 'Request WAN Matrix'. The Data Service Provider (DSP) will then provide an Availability Date and WAN Variant in response. WAN Variants are listed in Table 3 of SEC Appendix I 'Communications Hub Installation and Maintenance Support Materials (CHISM)' Annex E. In the exception case where the Availability Date for SM WAN Coverage is known, but the WAN Variant is not, with the implementation of SECMP0081 'Alignment of DUIS and CHISM to reflect current DCC Processing', the DSP will return " " (Space) for the South and Central regions.

2.2 Issue

When a DCC User sends Service Request 12.1 'Request WAN Matrix' to receive SM WAN Coverage, in most cases they will receive an Availability Date and WAN Variant. However, in an exception case, the Communications Service Provider (CSP) for the South and Central regions may respond to a SM WAN Coverage request (CSPM-S1 or CSPM-S2) with an Availability Date for coverage but without being able to confirm the WAN Variant that will need to be used. On receipt of this data, the DSP returns the Availability Date and the value of the unconfirmed WAN Variant in the response to Service Request 12.1 'Request WAN Matrix'.

The WAN variant returned by the DSP is defined by Table 3 in Smart Energy Code (SEC) Appendix I 'Communications Hub Installation and Maintenance Support Materials' (CHISM) Annex E as below:

WAN Variant (DCC 1.3)	WAN Variant (DCC 2.0)	CSP Region
Standard 420	420	CSP North
Variant 450	450	CSP North
Cellular	Cellular	CSP South and Central
Cellular+Mesh	Cellular+Mesh	CSP South and Central
No Coverage Intended	No Coverage Intended	N/A
" " Space	" " Space	CSP South and Central

With the pending implementation of SECMP0081 'Alignment of DUIS and CHISM to reflect current DCC Processing', a " " Space will be used by the CSP for the South and Central regions to indicate the unconfirmed WAN Variant.

2.3 Business Requirements

This section contains the considerations and assumptions for each business requirement.

1	To amend the DSP response in the case of an unconfirmed WAN Variant in the CSP South and Central regions from “ ” Space to “Unknown”
---	--

Table 1: Business Requirements for SECMP0106, CR1335

During a User engagement design discussion, it was highlighted by a customer that the “ ” Space response would be confusing and they would prefer a more meaningful response. It has been suggested that the wording to use is “Unknown”.

This change will require an update to the SM WAN coverage database managed by the CSP South and Central regions. A CHISM documentation change to Table 3 in CHISM Annex E must be included.

3 Description of Solution

The only Service Provider directly impacted by this Modification is CSP South and Central. The solution changes will include:

- Modification to the Telefónica Coverage Deployment Model output and SMWAN Coverage Checker Database to support the inclusion of “Unknown” instead of “ ” (space) as one of the recommended Communication Hub variant type against a post code when a WAN variant is not confirmed.
- The CSP Network Coverage Extract data extract files provided by the CSP per region i.e. one for CSP Central and one for CSP South via the existing CSP/DSP interface, will also include ‘Unknown’ as a Communication Hub variant when the WAN variant is not yet confirmed against a post code.

Additionally there will be reviews of the following uplifted documentation during the development of the Full Impact Assessment (FIA):

- SEC document Appendix I ‘CH-Installation-and-Maintenance-Support-Materials’ which includes an update to Annex E.3. Communications Hub WAN Variant Values. This change will take place.
- Modification to the CSP South and Central Reporting systems to include changes to the business rules to be able to process ‘Unknown’ when the Recommended Communication Hub variant type is ‘Unknown’.

There will be a change to CSP South and Central Test stub (DSP Emulator) to validate in PIT testing the response data to a request received over the CSP Management Gateway for a postcode or at a specific premise within a postcode or for a postcode district level.

The SD4.4.4 CSP Management Interface Specification is a design document maintained by the DSP. The attribute "commsHubVariant" in table 5 in this specification has a data type of String(30) which means the new value of 'Unknown' can be accepted without change.

Name	Description	Type	Mandatory
commsHubVariant	The value provided will be the relevant WAN variant, to indicate the WAN technology to be used for this postcode. Possible values “Cellular”, or “Cellular+Mesh” or “Special Installation Mesh”. If no coverage is planned then a value of “ ” (single space) will be returned.	String(30)	Yes

As part of the design changes, the DSP will add a new example value of 'Unknown' to the above table in SD 4.4.4 document.

4 Implementation Timescales and Approach

The scope under this PIA includes design, development (build), system testing, and performance testing within the PIT environments.

4.1 Implementation Approach

Whenever this Modification is implemented, based on the stated requirements above, the elapsed time for Design, Build and PIT will be approximately 3 months following the provision of full commercial cover.

The release lifecycle duration will be confirmed as part of the FIA. This work could be part of a maintenance or major SEC release.

The documentation change could be scheduled around the release date.

4.2 Release Costs and Charges

The table below details the cost of delivering the changes and Services required to implement this Modification Proposal.

The Rough Order of Magnitude cost (ROM) shown below describes indicative costs to implement the functional requirements as assumed now. The price is not an offer open to acceptance. It should be noted that the change has not been subject to the same level of analysis that would be performed as part of a Full Impact Assessment and as such there may be elements missing from the solution or the solution may be subject to a material change during discussions with the DCC. As a result the final offer price may result in a variation.

The table below details the cost of delivering the changes and Services required to implement this Modification. For a PIA, only the Design, Build and PIT indicative costs are supplied.

£	Design, Build and PIT	Total
Phase ROM	150,000	£150,000

Based on the existing requirements, the fixed price cost for a Full Impact Assessment is £19,480 and would be expected to be completed in 30 days.

4.3 Contract Schedules

Schedules will require modification to reflect the changes necessitated under this Modification. The contract schedules should be updated as part of a CAN which combines schedules updates from other relevant CRs.

At a minimum, the following contract schedules will require modification:

- Schedule 3 DCC Responsibilities
- Schedule 6.1 – to include delivery Milestones in relation to this CR
- Schedule 6.2 – Testing and Acceptance

- Schedule 7.1 – to reflect the new Charges for this CR

Additional Schedules may require modification due to the outcome of commercial discussions, which will follow submission of this Preliminary Assessment.

Schedules will require modification for both the Central and South CSP regions.

5 Risks, Assumptions, Issues, and Dependencies

The tables below provides a summary of the Risks, Assumptions, Issues, and Dependencies (RAID) observed during the production of the PIA.

DCC requests that the Working Group considers this section and considers any material matters that have been identified. Changes may impact the proposed solution, implementation costs and/or implementation timescales.

5.1 Risks

None at this time.

5.2 Assumptions

These assumptions have been used in the creation of this PIA. Any changes to the assumptions may require DCC to undertake further assessment.

Ref	Description	Status/Mitigation
MP106-AT01	Assume that this Modification will be released as a standalone DCC-L release.	Rejected, as is yet to be decided, and will not impact this PIA
MP106-AT03	Assume that the Communication Hub WAN variant values in Annex E.3 of SEC Appendix I 'CH Installation and Maintenance Support Materials' will be updated first to include " " (space) as a WAN variant for CSP Central and South as part of planned SEC Modification proposal SECMP0081 which is currently scheduled to be implemented as part of Nov'20 SEC Release.	Accepted
MP106-AT04	Assume there will be no changes to the PIT test approach as part of this Modification.	Accepted

5.3 Issues

None at this time.

5.4 Dependencies

Reference	Dependency	Required to	Status
MP106-DT01	Dependent on the DCC making available the uplifted SEC Appendix I 'CH-Installation-and-Maintenance-Support-Materials' specification prior to the Impact Assessment stage.	Review and confirm if the changes to its SMWAN Network Coverage data is compliant with the SEC documentation.	Rejected, updated Annex will be provided during FIA
MP106-DT02	Dependent on the updated DSP SD4.4.4 specification which includes the changes to the response data to its CSP hosted API.	CSP South and Central will not be able to make the relevant changes to the Network Coverage file extract data.	Rejected. SD4.4.4 already allows string values, no change required for this Modification

Appendix A: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Definition
CH, Comms Hub	Communications Hub
CHISM	Communications Hub Support Materials
CR	(DCC) Change Request
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
FIA	Full Impact Assessment
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
ROM	Rough Order of Magnitude (cost)
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SP	Service Provider

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MP106 'CHISM update for Unknown WAN Variant'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP106 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	E.ON believes this is an unnecessary change and will result in needless additional costs being incurred.
Western Power Distribution	Networks Party	Yes	We agree that the proposed solution sounds reasonable and will provide better clarity for Suppliers.
Utilita	Large Supplier	Solution seems reasonable and straightforward although we are finding it difficult to support this modification as the cost of implementation seems to be excessive.	Looking at the cost alone it appears that DCC has built a testing regime that is not fit for purpose, if a small change like this has such a cost behind it. It raises questions about the robustness of the DCC System for any other implementations in the future.

Question 2: Will there be any impact on your organisation to implement MP106?

Question 2			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	E.ON will have to invest money and resources to change our systems. Our systems are working effectively using the WAN Variant “ (Space). We do not agree changing a working system with little benefit is cost efficient. We also believe the DCC modification costs of £150,000 will be better spent in other areas.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 3: Will your organisation incur any costs in implementing MP106?

Question 3			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	We do not have a cost value at this stage, but we can confirm this will provide no cost savings or benefit.
Western Power Distribution	Networks Party	No	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 4: Do you believe that MP106 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	Yes	We believe that this modification would better facilitate SEC Objectives (a) and (g).
Utilita	Large Supplier	Yes	The solution proposed will add further clarity for Suppliers.

Question 5: Noting the costs and benefits of this modification, do you believe MP106 should be approved?

Question 5			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	For reasons noted above.
Western Power Distribution	Networks Party	N/A	Whilst we are likely minded to approve this modification we would challenge the costs for such a minor change. Please also see comments under Question 10.
Utilita	Large Supplier	No	Given the costs for implementation, perhaps it is worth investigating alternative solutions to deliver similar benefits. For example, a wording change in documentation which explains that “ “ should be read as: ‘Unknown’ might be just as useful. The cost should be more proportionate to the benefit.

Question 6: How long from the point of approval would your organisation need to implement MP106?

Question 6			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Currently we believe this will take up to six months.	No comment.
Western Power Distribution	Networks Party	N/A	No comment.
Utilita	Large Supplier	N/A	No comment.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	As noted above we do not believe this should be implemented.
Western Power Distribution	Networks Party	No	Whilst we understand the reasons given we would challenge the change being delayed when it forms part of the install process. We would challenge whether this should be implemented earlier to assist the roll out.
Utilita	Large Supplier	N/A	No comment.

Question 8: Do you agree that the legal text will deliver MP106?

Question 8			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	Yes	No comment.
Western Power Distribution	Networks Party	Yes	No comment.
Utilita	Large Supplier	Yes	No comment.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP106 is implemented?

Question 9			
Respondent	Category	Response	Rationale
E.ON	Large Supplier	No	This will not benefit customers as it will incur additional unnecessary costs within the industry.
Western Power Distribution	Networks Party	Yes	The solution proposed in the modification would assist Suppliers in understanding exactly what the situation is on site and therefore ensure that the Consumer have the correct expectations when an installation is booked.
Utilita	Large Supplier	No	No comment.

Question 10: Please provide any further comments you may have

Question 10		
Respondent	Category	Comments
E.ON	Large Supplier	No comment.
Western Power Distribution	Networks Party	<p>As mentioned previously we would like to understand exactly where the costs stem from as they seem quite large for a seemingly minor change.</p> <p>We would also like clarification around the Business Requirements in the DCC PIA. There are two Business Requirements detailed in the Modification Report, however there is only one within the DCC PIA and this requirement is slightly different.</p> <p>The requirement within the DCC PIA mentions DSP, however everything else is relating to CSP C&S. We would like to better understand exactly where the change is required, i.e. do CSP need to make changes or can DSP just provide amended wording to the User and the costs associated with each.</p>
Utilita	Large Supplier	No comment.

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MP139 'IVP and MVP dates for CHTS'

Modification Report

Version 0.3

4 December 2020



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.

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This document also has two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the responses received to the Refinement Consultation.

Contact

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

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1. Summary

This proposal has been raised by Sasha Townsend from the Data Communications Company (DCC).

The SEC contains a number of Technical Specifications. Schedule 11 'Technical Specifications Applicability Tables' (TSAT) specifies the dates in which Devices built to these specifications can be installed (the Installation Validity Period (IVP)) and maintained (the Maintenance Validity Period (MVP)).

There are three issues that the Proposer is looking to address:

- The first issue relates to Communications Hub stock compliant to the Communications Hub Technical Specifications (CHTS) v1.0 and the Great Britain Companion Specification (GBCS) v1.0 & v1.1 being held in volume and unlikely to be installed before the IVP end date of 31 January 2021.
- The second issue relates to CHTS v1.1 / GBCS v2.1 Communications Hubs needing to be installed by 28 February 2021, the GBCS v2.0 Applicability Period end date.
- The third issue focuses on the need to upgrade or replace installed CHTS v1.1 / GBCS v2.1 Communications Hubs (to CHTS v1.3 / GBCS v3.2 Communications Hubs) by 31 May 2021, the CHTS v1.1 MVP end date.

The Proposer believes that Single Band Communications Hubs (SBCH) and Dual Band Communications Hubs (DBCH) will become non-compliant if the current IVP and MVP end dates remain. This will lead to a high risk that Suppliers will have stock that they can no longer install, and therefore will need to be scrapped.

The Proposed Solution is to extend the affected IVP and MVP end dates by 12 months to allow Suppliers holding stocks of these Devices to install them and make the necessary updates before the IVP and MVP end dates.

This modification will not impact DCC Systems and therefore the costs to implement this modification are limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort. Large Suppliers, Small Suppliers, Device Manufacturers and the DCC will be impacted. This change is targeted for implementation in an ad-hoc SEC Release in January 2021. This is a Self-Governance Modification.

2. Issue

What are the current arrangements?

The SEC sets out the Smart Metering Technical Specifications, including the CHTS and the GBCS. Schedule 11 'Technical Specification Applicability Tables' specifies the dates in which Devices built to these specifications can be installed (the IVP) and maintained (the MVP). The TSAT also specifies the Applicability Period end date for the relevant version of GBCS. This means the date by which Parties should have taken all reasonable steps to ensure a Device is no longer operating on that version of GBCS.

The table titled 'CHTS and Relevant Versions of GBCS' of the TSAT, shown below, set outs the IVP (Installation Start Date and Installation End Date), MVP (Maintenance Start Date and Maintenance End Date) and Applicability start and end dates for CHTS and GBCS.

CHTS and Relevant Versions of GBCS

CHTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.0	30/09/16	31/01/21	30/09/16	28/02/21	1.1	06/11/17	Not determined
1.1	28/10/18	Not determined	28/10/18	Not determined	2.0	28/10/18	28/02/21
1.1	28/10/18	30/04/21	28/10/18	31/05/21	2.1	28/10/18	Not determined
1.3	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

What is the issue?

There are three issues:

Issue 1: Uninstalled CHTS v1.0 Communications Hubs.

This issue relates to Communications Hub stock compliant to CHTS v1.0 and GBCS v1.0 & v1.1 being held in volume and unlikely to be installed before the IVP end date of 31 January 2021.

The DCC Release 1 Communications Hubs across all regions were manufactured to CHTS v1.0 with firmware versions supporting both GBCS v1.0 and GBCS v1.1. Some of these remain in warehouses pending installation. Until they have been successfully installed and commissioned, these cannot be upgraded to a compliant CHTS v1.1 baseline. This means all those held in stock will need to be installed by the IVP end date of 31 January 2021.

Issue 2: Delays in Communications Hub firmware deployment to upgrade from GBCS v2.0 to GBCS v2.1.

This issue relates to the need to upgrade or replace installed CHTS v1.1 / GBCS v2.0 Communications Hubs to CHTS v1.1 / GBCS v2.1 Communications Hubs by 28 February 2021 (the GBCS v2.0 Applicability Period end date). The Proposer believes it will not be possible to achieve this due to delays in CHTS v1.1 / GBCS v2.1 Communications Hub firmware deployment as described below:

CSP North

GBCS v2.0 compliant firmware for the SBCHs in the Communication Service Provider (CSP) North Region was made available on the Central Product List (CPL) in July 2020. Mass Over-The-Air (OTA) updates are due to be deployed from late September 2020, which are anticipated to take several months to complete.

GBCS v2.1 compliant SBCH firmware in the North Region will not be available until March 2021. This date is after the 28 February 2021 Applicability Period end date for CHTS v1.1 / GBCS v2.0. From

March 2021, mass OTA updates will be required to upgrade the production estate onto the GBCS v2.1 compliant firmware, which is anticipated to take several months.

GBCS v2.0 compliant firmware for the DBCHs in the CSP North Region was due on the CPL in August 2020, with the GBCS v2.1 compliant firmware not expected to be available until February 2021 at the earliest.

This means the current GBCS v2.0 Applicability Period end date of 28 February 2021 is not compatible for either Single Band or Dual Band in the CSP North Region. It also means that the CHTS v1.1 / GBCS v2.1 IVP end date will not be sufficient to upgrade or replace these Communications Hubs.

CSP Central & South

DBCHs compliant with CHTS v1.1 and GBCS v2.1 in the Central and South Regions will be made available in production from November 2020. Based on the forecasts provided by Suppliers, it is estimated that installations of GBCS v2.1 compliant DBCHs are extremely unlikely to be completed by the current CHTS v1.1 / GBCS v2.1 IVP end date of 30 April 2021.

Issue 3: Upgrades to CHTS v1.1 / GBCS v2.1 Communications Hubs

This issue relates to the need to upgrade or replace installed CHTS v1.1 / GBCS v2.1 Communications Hubs (to CHTS v1.3 / GBCS v3.2 Communications Hubs) by 31 May 2021 (the CHTS v1.1 Maintenance Validity Period end date). The Proposer believes it will not be possible to achieve this due to delays in CHTS v1.3 / GBCS v3.2 Communications Hub firmware deployment.

Furthermore, due to re-plans of CHTS v1.3 and GBCS v3.2 compliant Communications Hubs firmware, the MVP end date will not be sufficient. This is because the full set of firmware releases across Single Band and Dual Band as well as all three Communications Hub providers will not all be available on the CPL and the existing estates upgraded before the current CHTS v1.1 / GBCS v2.1 MVP end date of 31 May 2021.

What is the impact this is having?

The Proposer believes the current Applicability Period end date for GBCS v2.0 and the IVP/MVP end dates for CHTS v1.1 / GBCS v2.1 means there is a risk that Communications Hubs will be non-compliant with a version of CHTS and GBCS with valid end dates.

Furthermore, if the current IVP end dates remain, there is a high risk that Suppliers will have stock that they can no longer install, which therefore will need to be scrapped. The Proposer also believes there is a high risk that there will be a period where Suppliers can no longer install Communications Hubs due to CHTS v1.3 and GBCS v3.2 compliant Communications Hubs not being available.

3. Solution

Proposed Solution

The DCC is proposing to extend four dates in SEC Schedule 11 by 12 months:

- CHTS v1.0/GBCS v1.1 IVP end date will be extended from 31/01/21 to 31/01/22
- CHTS v1.0/GBCS v1.1 MVP end date will be extended from 28/02/21 to 28/02/22
- CHTS v1.1/GBCS v2.0 Applicability end Date will be extended from 28/02/21 to 28/02/22
- CHTS v1.1/GBCS v2.1 IVP end date will be extended from 30/04/21 to 30/04/22
- CHTS v1.1/GBCS v2.1 MVP end date will be extended from 31/05/21 to 31/05/22.

This will allow Suppliers more time to install or upgrade their currently held stocks of Communications Hubs.

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
✓	Device Manufacturers		Flexibility Providers

Large Suppliers and Small Suppliers will be beneficially impacted as if this change is not made, they will have stock that they can no longer install or upgrade and will most likely need to be scrapped. During Refinement Consultation it was identified that Device manufacturers may be impacted by incompatibility issues.

DCC System

There is no impact on the DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 11 'Technical Specifications Applicability Tables'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Consumers

Consumers will benefit from this modification. If the proposed dates are not changed consumers may need to have Communications Hubs replaced. This will involve the inconvenience of a site visit and additional cost to the Smart Metering programme as a whole, which will eventually flow through to the consumer.

There are also potential risks presented to the consumer. Without significant combination testing, a lack of compatibility with older Communications Hubs and newer Devices could negatively impact the consumer experience, as a lack of compatibility affects Home-Area Network stability. This risk is even greater for consumers with a prepayment meter.

Other industry Codes

There are no impacts on other industry Codes from this modification.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions from this modification.

5. Costs

DCC costs

There are no anticipated DCC costs to implement this modification.

SECAS costs

The estimated the Smart Energy Code Administrator and Secretariat (SECAS) 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

There are no costs to and Party to implement this modification

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- One Working Day after decision.

This is a document only change and needs to be implemented before the first impacted IVP end date, which is 31 January 2021, requiring an ad-hoc SEC Release. Due to the time-critical nature, SECAS is recommending this modification be implemented one working day after the Change Board vote (if approved). This would be before the 10 working day Self-Governance decision referral window closes. If the decision was subsequently referred and overturned, the changes would be backed out of the SEC.

All respondents to the Refinement Consultation supported this approach except Device Manufacturers who were concerned about the risks of making this change (see below).

7. Assessment of the proposal

Observations on the issue

The Change Sub-Committee (CSC) agreed the issue was clear. Members noted the solution seemed self-evident and could theoretically proceed straight to the Report Phase. However, the Proposer queried whether the TSAT should be made Region-specific, which the CSC agreed would need to be discussed in the Refinement Process. Members encouraged this period be kept short so a timely decision on the proposal could be made in light of the first end date approaching.

The Security Sub-Committee (SSC) also stated an interest in the progress of the modification, as it noted that an overextension of IVP and MVP end dates could potentially present security risks. This would particularly be where Issue Resolution Proposals (IRPs) and Change Request Proposals (CRPs) had been implemented in later versions to the technical specifications to resolve security issues.

Solution development

The DCC completed analysis on the levels of stock (CHTS v1.0 and GBCS v1.1) being held by the industry and the 'run down' rates of this stock. It believed that just under one million Communications Hubs in this situation remained uninstalled. It believed 12 months would be the minimum time required for SEC Parties to install this stock. Following the feedback from the SSC, the DCC noted that there may be a security risk if the date is extended any further.

The Working Group agreed with the DCC's proposal to extend the relevant dates by 12 months. The DCC noted the urgency in progressing this modification, due to the imminent IVP and MVP end dates in the TSAT. The DCC noted that if this issue is not addressed, it expects Suppliers will not be able to install their remaining Communications Hub stock by the end of the current dates. Whilst these Communications Hubs could continue to be installed physically, they would not be compliant and would not count towards the rollout targets.

The Working Group agreed that making the TSAT Region-specific would be confusing and did not see any benefit so was not supportive of this. This question was not considered any further under this modification.

Following the Refinement Consultation, Device Manufacturers raised concerns regarding technical compatibility between newer Devices (on Smart Metering Equipment Technical Specification 2 (SMETS2) v4.2) and older versions of Communications Hubs. SECAS verbally discussed potential benefits of extending the MVP and IVP dates by six months instead of 12 in order to mitigate the risk of incompatibility issues. Device Manufacturers and the Technical Architecture and Business Architecture Sub-Committee (TABASC) provided feedback that reducing the length of the extension of dates would have little impact. One TABASC member also stated that it is likely Suppliers also have stocks of Devices on older versions of the technical specifications and it is likely these would be deployed with the older versions of the Communications Hubs they may be holding in stock.

The SSC again highlighted the potential security risks and requested the DCC complete a security risk assessment to enable the SSC to manage the risks going forward. However, the SSC agreed that this modification should not be delayed while waiting for this assessment to be completed.

Support for Change

Three of the Refinement Consultation respondents were Large Suppliers, who agreed that the IVP and MVP end dates should be extended. The other respondent (an Other SEC Party) represented Device Manufacturers. It disagreed with the Proposed Solution as it believed the risks of incompatibility had not been considered.

One respondent noted that the solution is effective as it reflects on the difficulties presented in the current pandemic in trying to meet the obligation of current dates. Another respondent also noted that there would be no lead time or costs to their business to implement this change. However, the benefit of the change would enable them to install Communications Hubs that would otherwise be stranded as they would be rendered non-compliant.

One respondent also noted, whilst they agreed with the implementation approach, it would recommend a quarterly or annual review of the dates set in the TSAT, to ensure the issue did not repeat itself before the next deadline. SECAS noted the recommendation, and the Proposer agreed.

Two respondents questioned if the MVP end date for CHTS v1.0/GBCS v1.1 should also be extended, which was not included in the first draft of the legal text. The Proposer confirmed this should be extended, and the appropriate changes were made to the draft legal text.

Concerns over Device compatibility with older Communications Hubs

The Other SEC Party noted the need for DCC to ensure compatibility of current Devices against older versions and maintaining HAN stability, as this is essential to the Smart Meter Implementation Programme (SMIP) and its reputation. SECAS asked the DCC if any testing has taking place regarding compatibility. The DCC confirmed a small sample of testing had taken place in which older versions of Communications Hubs (CHTS v1.0) proved compatible with three newer versions of Devices (SMETS2 v4.2).

The image below outlines the latest update as of November 2020 of compatibility testing of Communications Hubs vs SMETS2 version4.2/S2 version3.1.

R1 CH vs S2v4.2/S2v3.1 Meter - Status

Below Table Summarizes the current status of testing.

Green – Completed; Blue – In Progress.

R2 Meter Type	Meter Compliant to	Against R1 EDM1 1.38.6	Against R1 WNC 2.19	Against R1 Toshiba 11.31
MM1 ESME	S2v4.2 (R2 Meter)	Completed	Completed	Completed
MM1 GSME	S2v4.2 (R2 Meter)	Completed – Install successful & HAN Stability is good.	Completed – Install successful & HAN Stability is good.	Completed – Install successful & HAN Stability is good.
MM2 GSME	S2v4.2 (R2 Meter) Meter Provided wakes up every 2 mins.	Completed – Install successful & HAN Stability is good.	Completed – Install successful & HAN Stability is good.	Completed – Install successful & HAN Stability is good.

- ☐ In view of this, DCC Guidance Guide at <https://smartenergycodecompany.co.uk/download/26144/> (Sec 2.22.1 & 2.22.2) is updated.
- ☐ Given all R2 CH has entered supply chain, probability of using R1 CH with R2 meter in production should reduce.
- ☐ CSP-N R2 CH in supply chain has “Red dot” visual identifier to help avoid R1 CH installation with R2 Meter if needed.

Following concerns from Device Manufacturers, SECAS presented the issue to the TABASC. TABASC members acknowledged the risks and concerns presented by Device Manufacturers. Members considered the imminent upcoming IVP and MVP end dates, and the risks of not extending the dates versus the risks of incompatibility. It agreed that taking no action to extend the IVP and MVP end dates was unacceptable. It advised that the modification should proceed with a 12-month extension to the dates. The TABASC asked if the DCC could complete further testing to ensure compatibility across a wider variation of Devices and specifically further testing of newer Devices and CHTS v1.1 Communications Hubs, but that this should not hold up the modification.

Business case

This modification has a minimal implementation cost but will prevent Communications Hubs becoming non-compliant and stranded with the probability that they will then be scrapped. Communications Hubs cost around £40, and so, with around one million Communication Hubs affected, this is likely to mean up to £40m worth of Communications Hubs are at risk of being scrapped. Many of these Communications Hubs will become non-compliant due to delays in the firmware being made available and OTA updates taking place which is out of the control of Suppliers.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification better facilitates SEC Objective (a)¹ as it will prevent Communications Hubs being scrapped and will help to better facilitate the efficient provision and installation of smart metering systems.

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

Industry views

Three of the four Refinement Consultation Respondents agreed with the Proposer that this Modification better facilitates SEC Objective (a) as it will better facilitate the efficient provision and installation of smart metering systems by prevent Communications Hubs from being unnecessarily stranded. The other respondent disagreed that it better facilitates SEC Objective (a) as it will have a negative impact on consumer experience and could result in increased Device replacement and commercial disadvantage to Device Manufacturers.

Views against the consumer areas

Improved safety and reliability

There is no impact on the safety and reliability of consumers.

Lower bills than would otherwise be the case

There is no impact on lower bills for consumers.

Reduced environmental damage

There is no impact on the environmental damage.

Improved quality of service

There is no impact on quality of service.

Benefits for society as a whole

There is no impact on the benefits to society as a whole.

Appendix 1: Progression timetable

This Modification Proposal will be presented to the SEC Panel on 11 December 2020, with the recommendation it proceeds to the Report Phase as a Self-Governance Modification. If the Panel agrees, the Modification Report Consultation will then be issued ahead of the Change Board vote in January 2021.

Timetable	
Event/Action	Date
Draft Proposal raised	18 Aug 2020
Presented to CSC for final comment and recommendations	28 Aug 2020
Panel converts Draft Proposal to Modification Proposal	11 Sep 2020
Modification discussed with Working Group	7 Oct 2020

Timetable	
Event/Action	Date
Refinement Consultation	19 Oct – 30 Oct 2020
Proposed solution discussed with Security Sub-Committee	28 Oct 2020
Proposed solution discussed with TABASC	19 Nov 2020
Modification Report approved by Panel	11 Dec 2020
Modification Report Consultation	14 Dec 2020 – 8 Jan 2021
Change Board Vote	20 Jan 2021
Implementation (if approved)	21 Jan 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
CRP	Change Request Proposal
CSC	Change Sub-Committee
CSP	Central Service Provider
DCC	Data Communications Company
DBCH	Dual Band Communications Hubs
GBCS	Great Britain Companion Specification
HAN	Home-Area Network
IRP	Issue Resolution Proposal
IVP	Installation Validity Period
MVP	Maintenance Validity Period
OTA	Over the Air
SBCH	Single Band Communications Hub
SEC	Smart Energy Code
SECAS	Smart energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specifications
SMIP	Smart Meter Implementation Programme
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specifications Applicability Tables

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MP139 'IVP and MVP dates for CHTS'

Annex A

Legal text – version 0.2

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Schedule 11 'Technical Specification Applicability Tables' (TSAT)

These changes have been redlined against Schedule 11 version 9.0.

Amend table titled 'CHTS and Relevant Versions of GBCS' as follows:

TS Version Lookup Table

The following Table provides a cross reference to indicate which of the SEC Schedule 9 (SMETS) documents contain which Versions of the Device Technical Specifications.

Technical Specification Cross Reference	SMETS1 1 February 2018	SMETS2 1 February 2018	SMETS2 8 November 2018	SMETS2 4 July 2018
GSMETS	(GSMS) 1.2	2.0	3.1	4.2
ESMETS	(ESMS) 1.2	2.0	3.1	4.2
IHDTS	1.2	2.0	3.1	4.2
PPMIDTS	N/A	2.0	3.1	4.2
HCALCSTS	N/A	2.0	3.1	4.2

TS Applicability Tables¹

It should be noted that references to versions of specifications that can no longer be used operationally have been removed from these tables.

SMETS1 GSMSTS

GSMSTS Version	Installation Start Date	General Installation End Date	PPM Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.2	18/12/12	05/12/18	15/03/19	18/12/12	Not determined	Not applicable	Not applicable	Not applicable

SMETS1 ESMSTS

ESMSTS Version	Installation Start Date	General Installation End Date	PPM Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.2	18/12/12	05/12/18	15/03/19	18/12/12	Not determined	Not applicable	Not applicable	Not applicable

SMETS1 IHDTs

IHDTs Version	Installation Start Date	General Installation End Date	PPM Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date

¹ As required by SEC Section A3.33 – A3.36

1.2	18/12/12	05/12/18	15/03/19	18/12/12	Not determined	Not applicable	Not applicable	Not applicable
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SMETS2+ GSMETS and Relevant Versions of GBCS

GSMETS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	27/04/21	30/09/16	Not determined	1.1	06/11/17	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.0	28/10/18	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.1	28/10/18	Not determined
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

SMETS2+ ESMETS and Relevant Versions of GBCS

ESMETS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	27/04/21	30/09/16	Not determined	1.1	06/11/17	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.0	28/10/18	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.1	28/10/18	Not determined
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

SMETS2+ IHDTS and Relevant Versions of GBCS

IHDTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	27/04/21	30/09/16	Not determined	1.1	06/11/17	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.0	28/10/18	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.1	28/10/18	Not determined
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

PPMIDTS and Relevant Versions of GBCS

PPMIDTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	27/04/21	30/09/16	Not determined	1.1	06/11/17	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.0	28/10/18	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.1	28/10/18	Not determined
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

HCALCSTS and Relevant Versions of GBCS

HCALCSTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
2.0	30/09/16	27/04/21	30/09/16	Not determined	1.1	06/11/17	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.0	28/10/18	Not determined
3.1	08/11/18	27/04/21	08/11/18	Not determined	2.1	28/10/18	Not determined
4.2	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

CHTS and Relevant Versions of GBCS

CHTS Version	Installation Start Date	Installation End Date	Maintenance Start Date	Maintenance End Date	Relevant GBCS Version	Applicability Period Start Date	Applicability Period End Date
1.0	30/09/16	31/01/2 1 <u>2</u>	30/09/16	28/02/2 1 <u>2</u>	1.1	06/11/17	Not determined
1.1	28/10/18	Not determined	28/10/18	Not determined	2.0	28/10/18	28/02/2 1 <u>2</u>
1.1	28/10/18	30/04/2 1 <u>2</u>	28/10/18	31/05/2 1 <u>2</u>	2.1	28/10/18	Not determined
1.3	29/11/19	Not determined	29/11/19	Not determined	3.2	29/11/19	Not determined

GBCS and Relevant Versions of CPA Security Characteristics

GBCS Version(s)	Relevant Versions of CPA Security Characteristics
<ul style="list-style-type: none"> 1.0 1.1 	<p>The most recent Sub-Version of Principal Version 1 of the document entitled 'CPA Security Characteristic: Smart Metering – Communications Hub' published on the NCSC_website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p>
<ul style="list-style-type: none"> 2.0 2.1 	<p>The most recent Sub-Version of Principal Version 1 of the document entitled 'CPA Security Characteristic: Electricity Smart Metering Equipment' published on the NCSC website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p>
<ul style="list-style-type: none"> 3.2 	<p>The most recent Sub-Version of Principal Version 1 of the document entitled 'CPA Security Characteristic: Gas Smart Metering Equipment' published on the NCSC website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p> <p>The most recent Sub-Version of Principal Version 1 of the document entitled 'CPA Security Characteristic: Smart Metering – HAN Connected Auxiliary Load Control Switch' published on the NCSC_website at the time the relevant Device Model commences the CPA Certification or re-Certification process (as applicable).</p>

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DP144

‘Charging of Random Sample Privacy Assessments’

Modification Report

Version 0.3

4 December 2020

Corporate member of
Plain English Campaign
Committed to clearer
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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 Terry Jefferson on behalf of the Energy and Utilities Alliance (EUA). The methodology for carrying out Random Sample Privacy Assessments has evolved since originally being written into the Smart Energy Code (SEC). The SEC currently states that all Random Sample Privacy Assessment costs will be socialised. This means all Users are being charged for the cost of these assessments which are undertaken only by Other Users.

2. Issue

What are the current arrangements?

An Other User is a User who does not operate as a Supplier or Network Party, such as a Device Manufacturer or a Meter Installer. A Random Sample Privacy Assessment is an assessment carried out by an Independent Privacy Auditor (IPA) to identify the extent to which an Other User is compliant with each of its obligations. The emphasis is on the Other User to ensure that it is compliant, and these Users are assessed every year. Any costs which are incurred in the completion of Random Sample Privacy Assessments are then socialised across all Users. This is the only Assessment that is charged through Recoverable Costs, as all other Assessments are charged directly to the Other User.

What is the issue?

The SEC currently states that all Random Sample Privacy Assessments will be socialised under SEC Section I2.41:

“Expenditure incurred in relation to Other Users in respect of the matters described in Section I2.40, and in respect of Random Sample Privacy Assessments, shall be treated as Recoverable Costs in accordance with Section C8 (Panel Costs and Budgets).”

Where it mentions Section I2.40 in Section I2.41, this is in relation to Other Users being obligated to pay explicit charges to the DCC for all Privacy Assessments, with the exception of Random Sample Privacy Assessments. This section is detailed below:

“Other Users: Obligation to Pay Explicit Charges

I2.40 Each Other User shall pay to the DCC all applicable Charges in respect of:

- (a) all Privacy Assessments (other than Random Sample Privacy Assessments) carried out in relation to it by the Independent Privacy Auditor;”*

Additionally, where it mentions Section C8 for Panel Costs and Budgets, C8.2 mentions:

*“The costs and expenses capable of recovery under this Section C8 (the **Recoverable Costs**) shall be all the reasonable costs and expenses incurred”.*

This means that any Random Sample Privacy Assessment that is currently undertaken is confirmed as a Recoverable Cost. Because these costs for the Random Sample Privacy Assessments are treated as Recoverable Costs, it results in the industry as a whole paying for assessments which only Other Users undertake. As of September 2020, there has only been one completed Random Sample

Privacy Assessment and another one which is currently in progress. The projected cost of a Random Sample Privacy Assessment in the financial years 2020/21 and 2021/22 will range between £25,000 and £53,000.

What is the impact this is having?

Random Sample Privacy Assessments are triggered when the Other User exceeds a Privacy Assessment threshold of Service Request activity. At this point the Assessment becomes standard rather than an exceptional process. It would be more appropriate for these costs to be apportioned to the Other Users directly. The only exception to this should be if the assessment is conducted at the request of the SEC Panel, in which case the costs should be socialised.

Whilst this is having minimal impact currently, as rollout continues to gather pace Other Users will increase the number of Service Requests they use. As more Other Users have Assessments it will become increasingly important that the costs are allocated fairly.

3. Assessment of the proposal

Observations on the issue

CSC

The Change Sub Committee (CSC) initially believed that the issue should be taken for further input to see who supports the idea for changing the Random Sample Privacy Assessment charging methodology. One member suggested that it would be worth checking the numbers of Random Sample Privacy Assessments that have taken place and the costs associated with them to provide an idea of what the impact of changing the costs would be to individual users. The Smart Energy Code Administrator and Secretariat (SECAS) subsequently confirmed that as of November 2020, one Random Sample Privacy Assessment has been completed, with one other ongoing. The projected cost of the Random Sample Privacy Assessments in the financial years 2020/21 and 2021/22 will range between £25,000 and £53,000.

The CSC subsequently agreed that the Draft Proposal was ready to be converted to a Modification Proposal and should proceed to the Refinement Process. During discussions one CSC member suggested that since there was a set point at which these Assessments become necessary the description of 'Random' probably wasn't accurate and perhaps that should be considered during the Refinement Process.

Panel Sub-Committees

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

- The Security Sub Committee (SSC) confirmed that it has an interest in the Draft Proposal, and SECAS will return with updates once it enters the Refinement Process after conversion to a Modification Proposal. One member raised the point that there has only been a single completed Random Sample Privacy Assessment so far, in part due to how recently the assessment type was introduced into the SEC. SECAS agreed to update the SSC with the

Proposed Solution as part of the Refinement Process and to note any comments in the Modification Report.

- The Technical Architecture and Business Architecture Sub Committee (TABASC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and the Operations Group confirmed that they have no interest in the Draft Proposal.

Appendix 1: Progression timetable

The Draft Proposal will be taken to the Panel with the recommendation for it to be converted to a Modification Proposal and proceed to the Refinement Process, following agreement from the CSC. From there, the Proposed Solution will be discussed between the Proposer and SECAS with the target of a developed solution being taken to the February 2021 Working Group meeting for discussion. It will then be issued for Refinement Consultation the following week. If no negative comments are received, the Modification Report will be brought to the Panel in March 2021.

Timetable	
Event/Action	Date
Draft Proposal raised	28 Sep 2020
Presented to CSC for initial comment	29 Sep 2020
Sub Committee input sought	1 Oct 2020 – 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 the SSC	13 Jan 2021
Modification discussed with Working Group	3 Feb 2021
Refinement Consultation	8 Feb 2021 – 26 Feb 2021
Modification Report approved by Panel	12 Mar 2021
Modification Report Consultation	15 Mar 2021 – 5 Apr 2021
Change Board vote	21 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
CSC	Change Sub Committee
EUA	Energy and Utilities Alliance
IPA	Independent Privacy Auditor

Glossary	
Acronym	Full term
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub Committee
TABASC	Technical Architecture and Business Architecture Sub Committee