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SEC Panel Sub-Committee Report

1. Purpose and highlights

This paper provides the Panel with an update on recent activities from the Panel Sub-Committees, including key issues discussed, and details specific points the Sub-Committees would like to bring to the Panel's attention. The Panel is requested to note the updates and endorse the concerns raised by the Sub-Committees.

Highlights for the Panel's attention include:

- The Testing Advisory Group (TAG) assessed DCC's test completion for the SMETS1 Final Operating Capability (FOC) release and did not agree that the requirements had been met to allow Systems Integration Testing to complete. The TAG instructed the DCC to complete additional regression testing before seeking a decision. The DCC has since decided that the target implementation date cannot be achieved and is re-planning the release.
- The DCC presented the Cost/Benefit Analysis (CBA) to the TABASC at its meeting on Thursday 19 November. The TABASC was generally supportive of the CBA but recognises the need to understand the DCC's final solution and implementation plans following the outcome of the Request for Proposal (RFP).
- SECAS presented the TABASC with two Strategic Technical Design Review Project Initiation Documents (PIDs). The TABASC has recommended the project to SEC Panel and Board.
- The Operations Group (OPSG) express disappointment with the DCC's failure to deliver their expected short-term target of achieving 92% success rate on meter firmware delivery. The DCC have also been unable to deliver an appropriate long-term strategic plan to achieve SEC Performance minimum and target service levels.
- The DCC provided an overview to the OPSG on the current status and proposal to address the impacts of Radio Frequency (RF) Noise being generated by certain electricity meters. The OPSG requested further details on the plans and arrange regular updates on impact, volumes and progress at future OPSGs.

2. Technical Operations

2.1 TABASC Highlights

The TABASC met twice in the last month. The meetings covered the following topics:

Network Evolution

The DCC provided the CBA document for the Network Evolution Communication Hubs & Networks sub-programme. The TABASC was generally supportive of the CBA, but recognises that in order to fully answer the questions asked by BEIS of the SEC Panel, the TABASC will need to understand the DCC's final solution and implementation plans, following the outcome of the Request for Proposal, now expected February 2021.

DSP Engagement Plan

The DCC provided an updated DSP engagement plan, as requested by the TABASC. The DCC will return to the January 2021 TABASC meeting with an update on the progress with Study 2, which is currently ongoing, and will return with an extended plan through to Gate 2 showing where TABASC decisions will be required.

Smart Metering Strategic Technical Design Project

SECAS presented the TABASC with two Strategic Technical Design Review Project Initiation Documents (PIDs):

- Use Case 1: Electric Vehicles & Use Case 2: Distributed Energy Resources PID
- Use Case 3: Consumer App Controller Load PID

The TABASC has recommended the project to the Panel and Board.

Market Wide Half Hourly Settlements

The DCC provided the TABASC with an update on DCCs high-level design and implementation recommendations to support the introduction of Market-Wide Half Hourly Settlements (MWHHS). The TABASC provided feedback on the DCC proposals including considering an alternative option. DCC will consider the options further and return to TABASC.

DSP Motorway Cache

SECAS has developed a list of Alerts which it recommends for inclusion in the priority list for Phase 2 of the DSP Motorway Cache, as requested at TABASC 59. SECAS will be contacting Suppliers to ascertain whether Supplier systems rely on any device alerts over and above DCC alerts for the install and commission process.

CSP North

The DCC provided the TABASC with an update on Meter Read General Block (GBT) Transfer Performance. The DCC will provide the TABASC with a further update ex-committee.

Faster Switching Programme

The DCC presented the TABASC with an overview of the Faster Switching solution, which will then be presented to the other SEC Sub-Committees. The DCC will return to the TABASC when required as the programme develops.

2.2 TAG Highlights

The TAG met three times during the period to discuss SMETS1 FOC testing.

The TAG considered an amended approach to regression testing to accommodate changes made to fix high-severity defects identified late during Systems Integration Testing (SIT) and Migration testing. The TAG agreed that the DCC would need to complete additional regression testing using the full standard regression test pack and could demonstrate the stability of test results by running targeted functional tests at least twice.

The TAG assessed the DCC's test completion evidence for SIT and migration testing. The TAG agreed that the DCC had met all the requirements for migration testing to complete. However, the TAG concluded that for SIT the requirements had not been met and the DCC need to complete additional regression testing on defect fixes using the full standard regression test pack. The TAG instructed the DCC to complete the agreed regression testing and return to seek a decision once that testing has completed successfully without identifying any new defects.

The TAG also identified a significant residual risk related to a defect found outside of SIT and migration testing. Whilst this defect falls outside the TAGs consideration of test completion, the TAG considered the operational impact on Users, along with the potential to prevent Users from complying with commercial and regulatory obligations, to be substantial. This matter was referred to the Operations Group (OPSG) for further consideration, but the DCC decided that the target implementation date could not be achieved prior to the OPSG meeting. The DCC is currently re-planning the release.

2.3 Operations Group Highlights

CSP N Performance & Reporting

Audit findings

The DCC commissioned an independent audit of Arqiva's reporting processes and the findings have been shared with Arqiva: agreed actions to be shared at a future OPSG. The OPSG members raised concerns as to why the DCC were reluctant to share the audit findings with the OPSG before agreeing actions with Arqiva. The DCC noted that they felt it was sensible to discuss and allow Arqiva to challenge any of the findings before sharing with a wider audience.

Current Performance

The DCC had set a target of achieving 92% success on Performance Measure 2 '*Percentage of Category 1 Firmware Payloads completed within the relevant TRT*' for meter firmware downloads by the end of October based on the deployment of tactical changes. The DCC have yet to provide a confirmed figure for October which is due in the Performance Measurement Report (PMR) to be published in December. Arqiva are investigating whether there are any additional tactical changes that can be implemented.

However, early analysis of the October and November performance has indicated that Arqiva is still well below the target DCC set. An OPSG member reiterated that they have experienced very low success rates (approximately 30%) in CSP N for meter firmware download performance for November. The DCC acknowledged that 3 significant incidents impacted their performance throughout November. Arqiva have introduced an additional firmware download channel, to a total of four, that they believe should reduce the number of jobs being queued or timing out.

CSP N Detailed Strategic Plan

The DCC had targeted the end of October to provide a strategic long-term plan setting out how the SEC requirements and service levels would be achieved in CSPN. The OPSG highlighted their frustration with the delays in producing this plan for review and the continued impact the poor performance is having on the Suppliers ability to plan and deploy meter firmware upgrades.

The DCC are finalizing the plan with Arqiva and intend to bring it to the OPSG and TABASC for review in January.

CSP N Tech Refresh – Extraordinary Planned Maintenance

The DCC outlined a request for an extraordinary maintenance window of 12 hours on Saturday 27 February 2021. The proposal falls outside of the SEC allowance for Planned Maintenance in a month and the DCC were seeking endorsement from the OPSG ahead of presenting the request to the SEC Panel.

The OPSG endorsed the approach and schedule but additionally requested that the DCC provide additional information for review on the expected impacts to service and processes ahead of and following the outage. The OPSG requested that the DCC communicate the expected window and impacts as soon as this has been approved, but at the minimum meeting the obligation to provide 20 working days' notice to Users ahead of the month.

SMETS1 Stability Update

The OPSG noted that the DCO service has been without a Category 1 or 2 Incident since the 27 October 2020. The DCC presented an overview of the on-going and closed key mitigations with the target of closing off any remaining mitigations by Q1 2021.

The OPSG will continue to monitor the SMETS1 stability and mitigations until all the key mitigations are no longer required and there is evidence of at least two months of stability on the service.

CH & Network Review

The OPSG had a first discussion of the Cost Benefit Analysis produced by the DCC. The OPSG noted that the DCC had not yet provided specifics regarding the deployment model, which the OPSG had previously identified as required.

The OPSG concluded that it required further information and explanation to enable it to advise the Panel. These requirements have been shared with the DCC and will be provided as a summary paper to the OPSG. The OPSG noted that the deployment model and industry costs are key factors in the CBA.

The DCC and SECAS are in the process of agreeing the engagement plan for future meetings, at which the OPSG can review the additional information or discuss any response on why certain information cannot be shared.

RF Noise – Impact to the Service

The DCC described their proposed approach for addressing the issue of “Noisy Meters” and the risk to the service.

The DCC presented the current volumes of Electricity meters installed that are either non-compliant with ICHIS noise levels (>17db) or non-compliant but within the previously agreed derogation. The DCC noted that they have not seen evidence of the derogation compliant devices installed in the designated areas having an impact on the service. The DCC will be writing to industry to notify them that these derogation compliant devices can continue to be installed as per the previous agreement. However, the DCC noted the risk that if there was evidence of particular devices having an impact on

the service then they may request that they are removed. The DCC stated the priority was to focus on the replacement of devices above 17db noise as they seemed to be having the most impact but will be completing further analysis and reporting before progressing.

An OPSG member expressed disappointment regarding the previous communications from the DCC on halting installations: they noted that they had incurred costs complying with this instruction, whereas the new approach appeared different.

The OPSG emphasised the need for any rectification actions to be based on shared and validated evidence of risk. The OPSG also raised concerns about the implications and responsibilities where non-compliant devices go through Change of Supply.

The OPSG agreed that, overall, the proposed approach was a reasonable way forward.

The DCC agreed to provide a full description of the plan and updates at a future OPSG.

Spurious Alerts

The DCC provided an update on the alert volumes and remediation status.

Over 2 million 8F12 alerts have been removed from the service, following the deployment of Release 2 Communication Hub (CH) Firmware in CSP N over September and October. There is now under a million 8F12 alerts being generated per day in CSP N. The DCC noted that 95% of these alerts are being generated by CHs on Release 1 firmware and expect to these to be fixed following upgrade.

The DCC provided an overview of the remaining CH stock on Release 1 firmware and based on the current install rates, the DCC expect this stock to be exhausted after 34 weeks.

However, the overall volume of alerts in CSP N continues to rise as one make of ESME has started generating 8F3E alerts. This has been correlated with the Release 2 CH rollout but is still under investigation between the DCC and the manufacturer.

Service Performance

The OPSG noted that two Code Performance Measures (CPM) were below Target Service Level in the September PMR.

Code Performance Measure 1

CPM1 '*Percentage of On-Demand Service Responses delivered within the applicable Target Resolution Time*' was below Target Service Level at 95.10%. CPM1 has been below Target Service Level for the last 15 months.

It was impacted by the failure of Service Provider Performance Measure (PM) 2 '*Percentage of Category 1 Firmware Payloads completed within the relevant TRT*'. This was below Minimum Service Level in Communication Service Provider North (CSP N) at 54.50%. The OPSG continue to review the results of the DCC's remediation plans for CSP N performance (please see CSP N Performance & Reporting).

Maintenance

DCC noted that maintenance had been running at a higher than usual level recently, and that this would continue in November, reflecting essential work to be done.

3. Security Sub-Committee and SMKI PMA

3.1 Assurance and Compliance Status Decisions

The Security Sub-Committee (SSC) set the assurance status for two initial Full User Security Assessments (FUSAs) in November 2020.

The SSC also set the compliance status for one Verification User Security Assessment (VUSA) in November 2020. Details can be found in the confidential Appendix A.

3.2 Security Self-Assessments

The Security Sub-Committee (SSC) reviewed one Security Self-Assessment (SSA) in November 2020.

3.3 Director's Letters

The SSC reviewed two Director's Letters following a FUSA and one Director's Letter following a VUSA in November 2020.

3.4 SSC Highlights

CPA Industry Days

The SSC held three CPA Industry Days in November with the National Cyber Security Centre (NCSC) and Device Manufacturers and MAPs to discuss three main topics:

- Issues encountered in progressing Use Cases for Device Refurbishment in line with published guidance;
- NCSC proposals for strengthening CPA Security Characteristic (SC) evidence arising from proposed changes to the SCs as a result of the recent threat mapping exercise undertaken on behalf of SSC; and
- Proposed guidance for manufacturers and test laboratories to assist in CPA evaluations along the lines of 'Agreed Interpretations'.

The SSC has since begun work to address the feedback received from the three CPA Industry Days.

SAPC SC Update

The DCC presented the latest update regarding the Standalone Auxiliary Proportional Controller (SAPC) Security Characteristic's (SCs) and the SAPC SCs were approved by SSC Members.

MP139 / Arqiva GBCS v3.2 Implementation

The DCC provided an update on the issues that led the DCC to initiate [MP139 'MVP and IVP dates for CHTS'](#) and the associated Arqiva compliance with Great Britain Companion Specification (GBCS) v3.2 implementation and received feedback from SSC Members on the associated security risks. The DCC advised it would perform a risk assessment on the security risks on delaying the implementation of MP139 by 12 months, as requested by the DCC.

TSP Re-Procurement

DCC Representative (IS) presented an update on the proposed Trusted Service Provider (TSP) re-procurement and received feedback from SSC Members.

SMETS1 HAN Assurance Report

The DCC provided an update on the SMETS1 Home Area Network (HAN) Assurance Report for SMETS1 Device Security Testing, as required by SEC Appendix AL Section 17, and the SSC provided feedback.

SMETS1 Update

The SSC noted DCC updates regarding the different aspects of SMETS1 enrolment, including the DCC's Final Operating Capability (FOC) Live Service Criteria (LSC), and Dual Control Organisation (DCO) stability; Initial Operating Capability (IOC)/Middle Operating Capability (MOC) Morrison Data Services (MDS_ remediations; the Active and Monthly Dormant Migration Process, Eligible Product Combinations List (EPCL) reports, CIO report updates, Home Area Network (HAN) Control Assurance, MOC Secure remediations, and Device Model Combination Tranches (DMCT) for approval.

OTA Upgrade Timings

The DCC presented an update on over-the-air (OTA) upgrade timings for CSP regions, in order to provide assurance that urgent security firmware upgrades can be rolled out quickly and received feedback from SSC Members.

CPA Monitoring

The SSC was presented with an update on the early expiry of Commercial Product Assurance (CPA) Certificates, Prepayment Meters (PPM) Report, and CPA Remedial Plans.

SSC Risk Register

The SSC performed its quarterly review of the SSC Risk Register Review, focussing on the impact levels and mitigation controls of the presented risks.

New Draft Proposals and Modification Proposals

The SSC noted updates on the following Draft and Modification Proposal based on their potential impacts on security:

- [MP146 'SM WAN Coverage Date'](#)
- [MP139 'MVP and IVP dates for CHTS'](#)
- [MP134 'Use of SMKI Certificates relating to a SoLR event'](#)
- [DP128 'Gas Network Operators SMKI Requirements'](#)
- [MP109 'ADT and Exit Quarantine file delivery mechanism'](#)
- [MP107 'SMETS1 Validation of SRV 6.15.1'](#)
- [MP105 'Sending SR11.2 to Devices in Suspended State'](#)
- [MP104 'Security Improvements'](#)
- [MP078 'Incorporation of multiple Issue Resolution Proposals into the SEC – Part 2'](#)

3.5 SMKI PMA Highlights

FOC S1SPKI Certificate Policy

The DCC provided the SMKI PMA with an update on the draft SMETS1 Final Operating Capability (FOC) S1SPKI Certificate Policy and Certification Practice Statement as required by SEC Section L14.

An extraordinary SMKI PMA meeting was held at the end of November in order to make progress on a recommendation to the Security Sub-Committee (SSC) as to whether the FOC S1SPKI is fit for purpose to enable a recommendation to the SSC for the FOC Live Service Criteria Number 10.

FOC t-Scheme Outcome

The DCC provided the SMKI PMA with an update on the outcome of the most recent t-Scheme audit undertaken by the DCC as required by SEC Appendix AO, and advised that a meeting is taking place on 24 November to address the observations which have been raised. The final t-Scheme audit outcomes will be presented to the SMKI PMA at the extraordinary meeting at the end of November to enable an assurance status to be set which is required for FOC Live Service Criteria Number 10.

TSP Re-Procurement

The DCC provided an update on the Trusted Service Provider (TSP) re-procurement including the DCC's reasoning for its course of action.

SMKI Recovery Testing Update

The SMKI PMA noted the DCC's progress on Phase 2 of SMKI testing and noted that the outcome report will be ready for SMKI PMA review at the December meeting.

SMKI Recovery Key Guidance – Confidential Procedures

The SMKI PMA approved the updates to the SMKI Recovery Guidance – Confidential Procedures document and marked it as final.

SMKI PMA – Standards Guidance Review

The SMKI PMA approved the updates presented by SECAS to the SMKI PMA Standards Guidance.

New Draft Proposals and Modification Proposals

The SMKI PMA noted the update on [DP147 'SMKI Full Extract'](#) and provided feedback on the questions put forward by SECAS, and the proposed solutions from the Change Sub-Committee (CSC).

4. Recommendations

The Panel is requested to

- **NOTE** the contents of this paper; and
- **ENDORSE** the concerns raised by the Sub-Committees.

Cecily Bain

SECAS Team

4 December 2020

Attachments:

- **Appendix A:** User Security Assessments – Identified Non-Compliances (**RED**)