



# MP078

## ‘Incorporation of multiple Issue Resolution Proposals into the SEC - Part 2’

### Modification Report

Version 1.0

19 January 2022



## About this document

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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 business requirements for the solution.
- **Annex B** contains the full Data Communication Company (DCC) Impact Assessment response.
- **Annex C** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex D** contains the full responses received to the Refinement Consultation.

## Contact

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# 1. Summary

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This Proposal has been raised by Simon Trivella from British Gas.

Issue Resolution Proposals (IRPs) identify and resolve issues in the Technical Specifications documents of the SEC. The IRPs contained in this document have been identified as DCC System impacting and have been requested to be progressed as a Modification Proposal for implementation into the SEC. Implementation of these IRPs ensures that Devices will operate as intended.

There are three IRPs included in this modification. Two (IRP 550 and IRP 604) are aimed at ensuring when the Gas Smart Metering Equipment (GSME) receives a message known as GCS20r (report event configuration) the GSME can respond. The third (IRP 603) is to ensure Devices such as the In-Home display (IHD), Prepayment meter Interface Device (PPMID) and Consumer Access Devices (CADs) cannot access the security logs on the GSME or Electricity Smart Metering Equipment (ESME).

The Proposed Solution is to incorporate these IRPs into the SEC.

This modification will cost £2,633,973 and require an estimated eight-month lead time for implementation. It will impact Large Suppliers, Small Suppliers, Other SEC Parties and the DCC. Implementation is targeted for the November 2022 SEC Release, if approved as a Self-Governance Modification.

# 2. Issue

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## What are the current arrangements?

### IRP 550 and IRP 604

A 'GCS20' message is triggered by Service Request Variant (SRV) 6.2.10 'Read Device Configuration (Event and Alert behaviour)'. Currently, there are no instructions in the Technical Specification Great Britain Companion Specification (GBCS) on what response the GSME should provide in the instance it receives a message GCS20 from a Device. As it stands, when a GSME has no data to return, it is unable to provide a defined response to confirm this.

### IRP 603

The Smart Metering Equipment Technical Specifications (SMETS) and the GBGS require that the Gas Proxy Function (GPF), Communication Hub Function (CHF), GSME and ESME Security Logs can be read by remote parties. The GSME provides changes of its Security Log to the GPF so that the GPF can maintain a copy of the GSME's Security Log. This copy can be read by remote parties. Both the ESME and GSME make their Security Logs available on a user interface level through meter display. There are no explicit prohibitions currently for sharing Security Logs with Home Area Network (HAN) Devices.

## What is the issue?

The individual IRP details for this modification can be found on the Smart Energy Code Administrator and Secretariat (SECAS) website link [here](#) under document name 'MP078 - IRP documents'. These documents reflect the issue, background information and details of the solution that has been

discussed and agreed at Technical Specification Issues Resolution Sub-group (TSIRS). They are an integral part of the SEC modification.

These IRPs are inconsistencies within the Technical Specification. Manufacturers are dependent on these specification for using and developing their Devices. Without these corrections being implemented, Manufacturers are impacted as their Devices are unable to provide an accurate service to consumers. The TSIRS has agreed that these are issues and has agreed upon the solutions.

The IRPs included in this proposal, listed below, require changes to the GBCS with initial key impacts identified by SECAS in the table below.

IRPs included in MP078					
IRP No.	IRP Title	Impacted Technical Specification	Impacted Users	Impacted Devices	Notes
IRP550	GCS20r - Response when an error occurs	GBCS	<ul style="list-style-type: none"> <li>Gas Suppliers</li> <li>Device (GSME) manufacturers</li> </ul>	<ul style="list-style-type: none"> <li>GSME</li> </ul>	Limited / no impact on GS.
IRP603	Security Log display over HAN	SMETS & CHTS	<ul style="list-style-type: none"> <li>Import Supplier</li> <li>Gas Suppliers</li> </ul>	<ul style="list-style-type: none"> <li>CHF</li> <li>GPF</li> <li>GSME</li> <li>ESME</li> </ul>	Expected little impact on Users
IRP604	Query on IRP550 - Frame Control	GBCS	<ul style="list-style-type: none"> <li>Gas Suppliers</li> <li>Device (GSME) manufacturers</li> </ul>	<ul style="list-style-type: none"> <li>GSME</li> </ul>	Limited / no impact on GS

### IRP 550

Currently when a GSME receives a message from the Communications Hub known as GCS20r it reports the event configuration back to the Communications Hub, which in turn sends a Service Response to the DCC User. However, there are no instructions in the technical specifications (GBCS) on what response the GSME should give if it cannot send the information (for instance if it does not have the data). This in turn means no Service Response will be received by the DCC User requesting the information.

### IRP 604

This IRP has resulted from a typographical error in IRP 550. It has come to light there is an error in the alternate GCS20r response created for IRP 550. The Frame Control which has been set for this response has been defined as "profile -wide; not manufacturer specific; server-client; allow default response;". However, the direction should be 'client-server' and not 'server-client'. This is because the GSME is the client in the Device Management cluster and the response is sent from the client to the server.

### IRP 603

Currently IHDs, PPMIDs and CADs on the HAN can request security log information from the GSME or ESME and can display this information to the consumer.

## **What is the impact this is having?**

### **IRP 550**

No response will be received by the DCC User if the GSME does not hold the data, leaving the User unsure where the problem is.

### **IRP 604**

The IRP 550 solution has a typographical error which needs correcting for the response message to work accordingly. The incorrect direction of the Frame Control will cause inconsistency in the way the Device operates.

### **IRP 603**

As things stand, the consumer could view the security log information, which could be a security risk.

### **Impact on consumers**

IRP 603 impacts consumers as they can potentially view Security Log information.

## 3. Solution

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### Proposed Solution

#### IRP550

The Proposed Solution is to include instructions in the technical specifications for the case where the GSME does not have the necessary information.

#### IRP604

The Proposed Solution is to correct the GCS20r message template. The correction will be made to the direction of the Frame Control to display 'client-server', and not 'server-client'. By amending this in GBCS the specification will align with the ZigBee Smart Energy (ZSE) requirements.

#### IRP603

The Proposed Solution is to include instructions to ensure the security log information is not accessible by IHDs, PPMIDs and CADs.

## 4. Impacts

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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, Small Suppliers and Other SEC Parties, specifically Device Manufacturers, are impacted as they would require additional firmware for Devices. This would then require further testing from a User perspective. A new firmware version which would require testing would incur costs around testing, piloting, and deployment.

A Large Supplier responded to the Refinement Consultation supporting the solution put forward and advised there are gaps that need to be corrected to ensure robustness of the specification. It noted the changes to the SMETS and the GBCS would have to be understood and further work would be required with its meter providers to produce a firmware that adheres to the new specification.

## DCC System

The implementation of these IRPs will impact both Communication Service Providers (CSPs) and the Data Service Provider (DSP). The DCC has highlighted the following anticipated areas of impact:

- Parse & Correlate application
  - SMITEn Lite
- GBCS Integration Testing For Industry (GFI) tool
  - SMITEn Lite
- CSP design and build activities
- Device Future Dated Command processing
- Transform Library
- Self Service Interface (SSI)

The full impacts on the DCC Systems and the DCC's proposed testing approach can be found in the DCC Impact Assessment response in Annex B.

## SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 8 'Great Britain Companion Specifications' (GBCS)
- Schedule 9 'Smart Metering Equipment Technical Specifications 2' (SMETS2)
- Schedule 10 'Communications Hub Technical Specifications' (CHTS)
- Schedule 11 'Technical Specifications Applicability Tables' (TSAT)

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

## Technical specification versions

These changes will be applied to the next Sub-Version of the following Technical Specification series at the time the modification is implemented:

- GSME Technical Specification (GSMETS) v4.x
- ESME Technical Specification (ESMETS) v5.x
- CHTS v1.x
- GBCS v4.x

These changes will also be applied to any new Principal Versions of these documents that subsequently become effective on or before the MP078 implementation date.

## Consumers

No impacts on Consumers have been identified.

## Other industry Codes

No impacts on other industry Codes have been identified.

## Greenhouse gas emissions

No impacts on Greenhouse gas emissions have been identified.

## 5. Costs

### DCC costs

The DCC implementation costs to implement this modification is £2,633,973 if this was implemented as a standalone modification.

The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Standalone cost
Design and Build	£580,643
Pre-Integration Testing (PIT)	£1,306,073
Systems Integration Testing (SIT)	£727,257
User Integration Testing (UIT)	£0
Implement to Live	£20,000

Application Support costs will also be applicable at a cost of £1,573 per annum.

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

### SECAS costs

The estimated SECAS implementation 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.

### Party costs

One respondent to the Refinement Consultation advised they would incur cost through testing of new firmware Devices, but no other information was provided.

## 6. Implementation approach

### Agreed implementation approach

The Change Sub Committee (CSC) agreed an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision is received on or before 28 February 2022; or



- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received after 28 February 2022 but on or before 1 November 2022.

As the change impacts Technical Specifications, the modification should be implemented in a SEC Release that included an uplift to the Technical Specifications. The DCC Impact Assessment has stated that there is an anticipated lead time of eight months for its Service Providers up to implementation. Therefore, the earliest release this modification can be implemented in is the November 2022 SEC Release.

If this modification misses the cut-off date, it will then be implemented in the next Release which included a Technical Specification update. This is expected to be the November 2023 SEC Release.

## 7. Assessment of the proposal

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### Observations on the issue

The CSC recommended to the SEC Panel that the Draft Proposal be converted to a Modification Proposal and proceed to the Refinement Process.

The Working Group agreed the issue was clear and should progress further. The Working Group members were supportive of IRP603, IRP604 and IRP550 being included in MP078.

### Solution Development

The issues and the solutions have been discussed and agreed upon by the TSIRS. Although the TSIRS is a Department of Business, Energy and Industrial Strategy (BEIS) led group, various SEC Parties are represented. The TSIRS agreed the solutions and agreed they should be implemented into the SEC. Please note, no business case analysis is performed by the TSIRS.

### Discussions around the costs of this modification

#### *Preliminary Assessment*

SECAS presented the findings of the DCC Preliminary Assessment, which was received 31 December 2019, to the Working Group, which included the cost for delivering the changes and services required to implement this modification. This was originally expected to be £1,700,000 with a full DCC Impact Assessment costing £274,860, with an implementation lead time of three to six months for the DSP and six to 12 months for the CSPs. The Working Group members noted the DCC Preliminary Assessment findings and questioned the high cost. The DCC has been continuously challenging the cost with Service Providers since the first DCC Preliminary Assessment was presented to the Working Group.

SECAS subsequently presented the revised DCC Preliminary Assessment, which was received on 18 November 2020, to the Working Group. This included the revised cost, up to end of PIT, to be £705,680. SECAS highlighted the DCC's estimate of the cost to deliver MP078 would reduce by £240,000 if MP078 was released alongside [SECMP0015 'GPF timestamp for reading instantaneous Gas values'](#) and [SECMP0056 'IHD / PPMID Zigbee Attributes Available on the HAN'S'](#) in the June 2022 SEC Release. This would reduce the overall cost to £465,680 due to synergies across the testing phase.

## **Impact Assessment**

The Proposer was concerned by the large costs contained within the Preliminary Assessment, both for the solution as well as carrying out the Impact Assessment. This caused a delay in requesting the Impact Assessment from the Change Board as further information on the high costs was requested from the DCC. The Technical Architecture and Business Architecture Sub-Committee (TABASC) acknowledged and noted the DCC cost to complete the Full Impact Assessment of £94,430 and was supportive of MP078 proceeding for a DCC Impact Assessment. Following this support, the Change Board approved the request.

The DCC Impact Assessment was received in November 2021. The costs for development, PIT, SIT and Implementation were increased to £2.6m. This increase is largely due to the increase in proposed testing by the CSP North, although the DCC also noted that it considered the Design, Build and PIT costs to be higher than expected too. The CSP Central & South's costs were far lower and it also noted that the functionality was either already introduced, or would be introduced as part of its upgrades to its Communications Hubs.

The Impact Assessment was also discussed with the TABASC. The TABASC queried whether a modification would be required at all given this is already being implemented by the CSP Central and South under its firmware development and if it should instead be made clear that it should not make the Security Log available on the HAN, without necessitating a change to the Technical Specifications.

The TABASC discussed whether it could be acceptable for the CSPs to have different functionality around the availability of the security log on the HAN, and whether having functionality on a single CSP would set any precedent for allowing changes only in one CSP region. The Chair challenged the need to make all regions the same in this case as, at a minimum, only the CSP Central and South making the change would mean that two-thirds of the SMETS2+ estate would benefit from this change. The Chair also noted that this functionality could be added as a requirement in the Network Evolution Communications Hub programme. If that could be included, then the costs would not be borne under this modification.

A TABASC member representing Other SEC Parties suggested this issue should be returned to the TSIRS to determine the actual scope of the problem. They noted that most Devices, if not all, did not share the Security Log with the HAN anyway. Therefore, any change to Technical Specifications could be added to prevent future instances, but without an impact on the Communications Hub. The TABASC Chair agreed, stating that would result in a new IRP and therefore would be managed separately to this modification.

The Impact Assessment was also presented to the Working Group. Working Group members queried why the CSP North required two cycles of PIT. The DCC confirmed it had continually pushed back on the CSP North on the testing level it deems necessary and associated costs. The CSP North has stated it requires two cycles of PIT in case an issue is missed during the first cycle. A Working Group member questioned whether SEC Parties should incur double the costs because the CSP North was not able to have confidence in its own testing through a single cycle.

## **Business case**

These IRPs add clarity and corrections to the Technical Specifications documents. Device manufacturers are required to follow these Specifications when developing or maintaining their Devices. Therefore, any errors or miscommunication of these Specifications will mean the Device will not work as intended. Implementing MP078 will benefit the industry as Devices will be performing accurately. It will also add clarity and consistency across the Specification.

IRP603 has been determined by SSC as a low risk and is tolerable as a standalone risk.

During this modification SEC Parties have not confirmed that IRP550 presents an issue that affects them.

## Support for Change

### Working Group

The Working Group members were supportive of IRP603, IRP604 and IRP550 being included in MP078. However, they also acknowledged the high costs for this modification and the need for a business case to justify implementation.

### Views of Sub-Committees

The TABASC highlighted it was dependent on the DCC to reduce the high costs of this modification. Upon receipt of the DCC Impact Assessment the TABASC provided a strong recommendation to reject the modification as the costs to implement were not justified against a business case. The TABASC noted that the CSP South & Central was implementing this fix regardless of the modification outcome and that would deliver the outcome for two thirds of the country, albeit there would not be such in depth testing.

SECAS also presented MP078 to the Security Sub-Committee (SSC) regarding IRP603 which demonstrated security concerns. The SSC agreed and requested the DCC Security Team to conduct a risk assessment on IRP603. The findings of the assessment confirmed the level of risk associated with IRP603 is very low and tolerable as a standalone issue.

## Views against the General SEC Objectives

### Proposer's views

The Proposer believes that MP078 would better facilitate SEC Objective (a)<sup>1</sup>, as these IRPs resolve issues with the Technical Specifications which are the minimum requirements for Device manufacturers.

### Industry views

Two responses were received from the Refinement Consultation. A Network Party supported the modification as it was not impacted by any of the IRPs. A Large Supplier supported the solution put forward due to gaps which require correcting to ensure a robust specification. However, the Large Supplier did state it would be impacted if MP078 was implemented. It advised IRP603, IRP604 and IRP550 would require additional firmware for Devices which are not compliant to the current gaps. Changes to the GBCS and the SMETS would need to be understood and further discussions with meter providers would need to be conducted to produce firmware that adheres to the new specification. The Large Supplier did remain supportive of the MP078 and agreed the modification effectively better facilitates the SEC Objectives.

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

## Views against the consumer areas

### Improved safety and reliability

The change is neutral against this area.

### Lower bills than would otherwise be the case

The change is neutral against this area.

### Reduced environmental damage

The change is neutral against this area.

### Improved quality of service

This implementation will have a positive impact as manufacturers will have access to the most up to date Technical Specification which are accurate and consistent. This will enable manufacturers to develop or enhance their Devices using the guidance provided from these specifications. The quality of service their Device provides will benefit their customers.

### Benefits for society as a whole

This implementation will benefit society as premises will have the most up to date Devices which operate as they should per the Technical Specification.

## Appendix 1: Progression timetable

Following the Modification Report Consultation the modification will be presented to the Change Board for vote under Self-Governance on 23 February 2022.

Timetable	
Action	Date
Draft Proposal raised	10 Jul 2019
Presented to CSC for comment and recommendations	23 Jul 2019
Panel converts Draft Proposal to Modification Proposal	9 Aug 2019
First Preliminary Assessment requested	6 Sep 2019
First Preliminary Assessment returned	31 Dec 2019
Modification discussed with Working Group	5 Feb 2020
Refinement Consultation	17 Feb – 6 Mar 2020
Second Preliminary Assessment requested	16 Apr 20
Second Preliminary Assessment returned	3 Sep 2020
Updated Preliminary Assessment with cost information received	18 Nov 2020
Presented to Security Sub Committee	25 Nov 2020
Presented to TABASC	4 Feb 2021

Timetable	
Action	Date
Impact Assessment costs approved by Change Board	24 Mar 2021
Impact Assessment requested	10 May 2021
Impact Assessment returned	18 Nov 2021
Impact Assessment discussed with Working Group	1 Dec 2021
Impact Assessment discussed with TABASC	2 Dec 2021
Impact Assessment discussed with TABASC	6 Jan 2022
Modification Report approved by CSC	18 Jan 2022
Modification Report Consultation	19 Jan – 8 Feb 2022
Change Board vote	23 Feb 2022

## 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
BEIS	Department of Business, Energy and Industrial Strategy
CAD	Consumer Access Device
CHF	Communications Hub Function
CHTS	Communications Hub Technical Specifications'
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
ESME	Electricity Smart Meter Equipment
ESMETS	ESME Technical Specification
GBCS	Great Britain Companion Specification
GFI	GBCS Integration Testing For Industry
GPF	Gas Proxy Function
GSME	Gas Smart Meter Equipment
GSMETS	GSME Technical Specification
HAN	Home Area Network
IHD	In Home Device
IRP	Issue Resolution Proposal
PIT	Pre-Integration Testing
PPMID	Prepayment meter Interface Device
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specifications

Glossary	
Acronym	Full term
SRV	Service Request Variant
SSC	Security Sub Committee
SSI	Self Service Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specifications Applicability Tables
TSIRS	Technical Specifications Issue Resolution Sub-group
UIT	User Integration Testing
ZSE	ZigBee Smart Energy