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| <b>Action:</b>          | <b>For Decision</b>    |

## 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 DCC provided the TABASC with a programme update on Study 2 of the Data Service Provider (DSP) Re-Procurement and will return to the next TABASC meeting with the key outputs from Study 2.
- The TAG identified several high severity defects during User testing which resulted in the DCC concluding that it will not be possible to implement the Final Operating Capability (FOC) primary release during 2020. Detailed analysis of each defect is underway to establish why they were not identified during earlier test phases. The results of this analysis will be provided to the TAG in January 2021 and the TAG will use this information to assess whether the FOC codebase is sufficiently stable to continue with the existing governance once the defects are fixed.
- The DCC acknowledged CSP N's failure to achieve the 92% performance level and has now presented the OPSG with five Service Improvement Plans (SIPs) to improve CSP N's delivery of Over the Air (OTA) firmware upgrades. The DCC has agreed to confirm dates for the delivery of the SIPs and the anticipated outcomes.

### 2. Technical Operations

#### 2.1 TABASC Highlights

The TABASC met once in the last month. The meeting covered the following topics:

##### Market-Wide Half Hourly Settlements

The TABASC reviewed the draft survey on the end-to-end impacts of Market Wide Half Hourly Settlements (MWHHS) and agreed that SECAS should proceed with issuing the survey once the required updates to the survey questions have been made.

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## **Export Review Project**

SECAS provided the TABASC with guidance on current working practices for the Export Business Processes. The TABASC requested that the Export Review Project remains open and that a further workshop is held to discuss outstanding questions.

## **Electric Vehicles**

BEIS provided the TABASC with an update on Electric Vehicle Smart Charging and Innovation, for information only.

## **DSP Re-procurement**

The DCC provided a programme update on Study 2 of the Data Service Provider (DSP) Re-Procurement, including the objectives and scope of the study and the next steps. The DCC will return to the next TABASC meeting with the key outputs from Study 2.

## **DCC Boxed Project**

The DCC presented the TABASC with an update on its DCC Boxed project, including its proposed indicative pricing, product overview and availability. The DCC will return to a future TABASC meeting with the information requested.

## **P379 Cost Benefit Analysis (CBA)**

SECAS briefed the TABASC on ELEXON's P379 CBA and the SEC Panel response to the consultation, which includes the concerns previously raised by TABASC members.

## **2.2 TAG Highlights**

The TAG met once during the last month to discuss the following topics:

### **SMETS1 FOC testing**

Several high severity defects were identified during User testing which resulted in the DCC concluding that it will not be possible to implement the Final Operating Capability (FOC) primary release during 2020. Detailed analysis of each defect is underway to establish why they were not identified during earlier test phases. The results of this analysis will be provided to the TAG in January 2021 and the TAG will use this information to assess whether the FOC codebase is sufficiently stable to continue with the existing governance once the defects are fixed.

The TAG assessed an initial re-plan for delivery and testing of the FOC primary release. The DCC will release three code fixes into the UIT-B environment to allow for Testing Participants to retest the fixes and close the defects they identified during previous User testing. The revised plan also includes a contingent additional code release in case there are additional defects identified during Systems Integration Testing (SIT) or User testing.

The TAG questioned whether the code base will be stable once the known defects have been fixed, as this was not previously demonstrated during SIT before the defects were identified. The TAG will consider the results of the DCC's analysis of the Severity 2 defects that were found during User testing before deciding whether the code is stable, and whether the proposed re-plan is acceptable.

The fix for the 'HH data opt-in/out' defect is not included in the scope of the three planned code releases. The TAG agreed that even if the consultation to change the regulatory documents is approved, there is still a residual risk that would result in regulatory, commercial, and operational risks for Users. The TAG requested that the DCC creates a fix and provide dates of when it can be tested and deployed so that the risk is not left 'open-ended' and the extent to which Users will be exposed to

these risks can be assessed. The TAG suggested that deployment of the fix would not necessarily need to take place prior to the release being implemented, as long as the deployment date is known.

### **SMEST1 FOC Uplift 2.0 Test Approach Document**

The TAG reviewed the SMETS1 FOC Uplift 2.0 Testing Approach Document (TAD). The proposed approach mirrors that used for the SMETS1 Uplifts 1.1 and 1.2. The approach is subject to the FOC primary release replan, so the TAG deferred its approval until the plan has stabilised.

### **November 2021 Scope and Approach Overview**

The TAG carried out an initial review of the November 2021 SEC Release testing approach.

[SECMP0007 – Firmware updates to IHDs and PPMIDs](#) – will be split across the November 2021 and June 2022 SEC Releases. The DCC will deliver the Data Service Provider (DSP) aspects of the release in November 2021, and the CSP Communications Hub Firmware changes in June 2022. This will result in a 'dual governance' approach to testing, similar to that used with the November 2020 Release.

The DCC User Interface Specification (DUIS) v1.0 and DUIS v2.0 will not be included in the scope of functional and regression testing as these versions will no longer be applicable in November 2021. The November 2021 Release will require emulators to test the changes for GBCS 5.0, as real Meters will not be available during the SIT window. Regression testing will be completed using real Meters.

The Common Test Scenarios Document (CTSD) will be re-designated at the start of the User testing window to allow Users to complete any User Entry Process Testing (UEPT) or Additional SR Testing prior to the release being implemented.

### **Release 2.0 DBCH Fylingdales Approach to DIT**

The TAG carried out an initial review of the Release 2.0 Dual Band Communications Hub (DBCH) Fylingdales approach to Device Integration Testing (DIT). Testing will take place in the SIT-A environment and the Device Integration Test Approach Document (DITAD) will require an addendum to accommodate Fylingdales.

The functionality planned to be tested will cover all DITAD requirements, with the only exceptions being testing that has already been carried out. The DIT exit requirements will remain the same as for previous releases.

## **2.3 Operations Group Highlights**

### **CSP N Performance & Reporting**

The DCC acknowledged CSP N's failure to achieve the 92% performance level that it, and the DCC had set. The DCC outlined five Service Improvement Plans (SIPs) to improve CSP N's delivery of Over the Air (OTA) firmware upgrades. The DCC agreed to confirm dates for the delivery of the SIPs and the anticipated outcomes.

OPSG members were disappointed with the continued failure to deliver a satisfactory service, noting that the OPSG had been emphasising these shortcomings for more than 18 months. The OPSG expressed its lack of confidence in CSP N service stability after the SIPs had been implemented and noted that there were no indications of lessons learnt from previous plans.

As part of the SIPs, the DCC are requesting support for a meter firmware OTA batching trial on 18 January 2021; whereby the DCC would seek to automatically batch firmware download jobs. The

OPSG endorsed the principle of the trial. The OPSG noted that the proposed date appeared to conflict with the CPA remediation plans which had already been scheduled. The OPSG requested that the DCC: engages with Users to confirm a suitable date for the trial to begin; informs the Panel of the proposed change in service seeking its acquiescence; and communicates the final plan to all SEC Parties.

## **Service Stability Update**

### **SMETS1**

The DCC provided an update to the OPSG on the stability on the SMETS1 service. There have been no High category Incidents related to the Dual Control Organisation (DCO) for over 70 days now.

The DCC are planning to reduce reliance on any mitigations by early February, whereby the DCC will explore de-escalating the focus on the DCO. The DCC are currently assessing the risk profile related to expected migration volumes from Secure and Final Operating Capability (FOC). The OPSG noted that the DCC will continue to closely monitor performance and throughput for the foreseeable future.

Whilst being disappointed with the difficulties the DCO had caused during its early period of live operation, the OPSG expressed its appreciation of the concentrated and determined efforts the DCC had made to rectify the situation, and the clear and candid reporting of progress to the OPSG.

### **SMETS2**

The OPSG noted that there had been no category 1 incidents, and only 1 category 2 incident in December: this was a reduction over the levels experienced in the previous quarter.

## **User Forecasting**

SECAS and the DCC presented proposals to the OPSG to address issues relating to Service Request (SR) and Certificate Signing Request (CSR) forecasting. The DCC provided an overview of the modelling that has been developed so far on [MP116 'Service Request Forecasting'](#).

The OPSG endorsed the proposal to raise a modification to alter the obligation on Users for CSR forecasts. SECAS took an action to consider the expectation of User forecasts whilst the modifications are in development and make a proposal to the SEC Panel. It is likely that this will propose that Parties need not submit forecasts under the current arrangements, since DCC are able to operate adequately without them, and they have been of limited use to date.

## **Business Continuity Disaster Recovery (BCDR) 2021**

The OPSG were given an update on the outcomes of BCDR exercises in 2020. All exercises had been completed successfully within the Recovery Time Objective (RTO), with the exception of one exercise missing the target by just over 30 minutes.

The OPSG were presented with the BCDR schedule and plan for 2021. The OPSG endorsed the proposed schedule, subject to confirmation that the TABASC Chair has no objections to the technical approach.

## **DCC 'Boxed' – Testing tool**

The DCC provided an overview of a testing product in development which provides a full end-to-end representative environment of the core DCC systems.

The DCC are targeting April 2021 for the product to be available on the market. The OPSG questioned the DCC's product demand and cost assumptions, and whether the expected costs had been considered by the DCC's Finance Forum. It was noted that this endorsement should be obtained before incurring costs that SEC Parties would need to fund.

## Spurious Alerts

The DCC provided an update on the alert volumes and remediation status. The OPSG noted that, in general, the overall volumes of superfluous alerts were now under control.

8F12 alerts now only represent approximately 11% of the daily alerts in the CSP N region. The majority of alerts in CSP N now consist of 8F3E alerts which are being produced primarily by one ESME manufacturer. This is currently under investigation between the DCC, Service Users and the Manufacturer.

The Toshiba v12.36 CH release is due for Operational Acceptance (OA) for Mass Rollout following the successful Pilot activity in December 2020. This release is expected to further reduce the 8F3E alerts being generated in the CSP Central & South region. The DCC will provide an update on the outcome of this release at the March 2021 OPSG.

## Service Performance

The OPSG noted that one Code Performance Measures (CPM) was below Target Service Level in the November PMR. SECAS has provided a summary of the original and updated CPM1, PM2 and Service Credits from May 2018 to June 2020 following the resolution of the Arqiva reporting issue.

### Code Performance Measure 1

CPM1 '*Percentage of On-Demand Service Responses delivered within the applicable Target Resolution Time*' was below Target Service Level at 91.69%. CPM1 has been below Target Service Level for the last 16 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 11.73% down from 54.50%. The performance was impacted by the agreed exceptional process of rejecting meter firmware downloads during the Release 2 CH firmware rollout. The OPSG continue to review the results of the DCC's remediation plans for CSP N performance (please see CSP N Performance & Reporting).

## 3. Security Sub-Committee and SMKI PMA

### 3.1 Assurance and Compliance Status Decisions

The SSC set the compliance status for two Full User Security Assessments (FUSAs), and one Verification User Security Assessment (VUSA) in December 2020. Details can be found in the confidential Appendix A.

### 3.2 Security Self-Assessments

The Security Sub-Committee (SSC) reviewed two Security Self-Assessments (SSAs) in December 2020.

### 3.3 Director's Letters

The SSC reviewed two Director's Letters following FUSAs and noted an update on a Director's Letter following a VUSA in December 2020.

### 3.4 SSC Highlights

#### Interoperability Checker

The DCC and Citizen's Advice presented an update regarding the Interoperability Checker go-live criteria, and the SSC provided formal notification to BEIS that there were no security issues that would prevent the start of live operations.

## **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); Initial Operating Capability (IOC)/Middle Operating Capability (MOC) MDS remediations; the Active and Monthly Dormant Migration Process, Eligible Product Combinations List (EPCL) reports, CIO report updates, and MOC Secure remediations.

## **SMETS1 HAN Assurance Report**

The DCC and an NCC Group Representative 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 noted that a further update will be provided by the DCC in January.

## **MP139 'MVP and IVP dates for CHTS' Risk Assessment**

The DCC provided the risk assessment for SEC Modification Proposal [MP139 'MVP and IVP dates for CHTS'](#) and the SSC advised on the associated risks of delaying its implementation.

## **Alt HAN Update**

Alt HAN Co Representatives presented the latest Alt HAN update and its approach to security, and the SSC provided advice on standards and Device assurance.

## **DCC SOC2 2020 Assessment**

The DCC presented the latest update on the 2020 SOC2 assessment recently undertaken by the DCC. The SSC provided feedback on the exceptions raised and noted that the full report will be made available in January 2021.

## **User CIO Updates**

The User CIO provided an update on User compliance with SEC security obligation G3.23, which requires Users to locate components of their User System within the UK, and the challenges presented by the COVID-19 pandemic. The SSC provided feedback on security controls and geographical restrictions.

## **Network Evolution**

The SSC noted a DCC update on Network Evolution security requirements and their alignment with the GB Smart Metering security obligations in SEC Section G. The DCC has an outstanding action to demonstrate that the DCC's Requirements Traceability Matrix is aligned to the SSC Security Requirements document.

## **CPA Monitoring**

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

## **3.5 SMKI PMA Highlights**

### **SMETS1 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, and the SMKI PMA approved the Certificate Policy for consultation.

### **FOC t-Scheme Outcome and Remedial Plan**

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The DCC provided the SMKI PMA with the outcome of the most recent t-Scheme audit undertaken by the DCC as required by SEC Appendix AO, and Members advised on the required follow-up actions.

#### **SMKI t-Scheme Outcome and Remedial Plan**

The DCC provided the SMKI PMA with the outcome of the t-Scheme audit, and Members advised on the required follow-up actions.

#### **TSP Re-Procurement**

The SMKI PMA noted an update from the DCC on the latest position of the re-procurement of the Trusted Service Provider (TSP).

#### **SMKI Recovery Testing Outcome**

The SMKI PMA noted the DCC update on the outcome report of Phase 2 of SMKI testing and considered the identified defects.

#### **SMKI Recovery Lessons Learned**

The SMKI PMA Chair presented the lessons learned provided by three Suppliers who took part in the most recent SMKI Recovery testing exercise, and the DCC advised it will investigate if the provided suggestions are feasible.

#### **SMKI Recovery Testing Scenarios**

The SMKI PMA Chair provided the SMKI PMA with the SMKI Recovery testing scenarios, and the SMKI Specialist suggested aspects of SMKI testing the DCC should consider undertaking in 2021 subject to feasibility.

#### **New Draft Proposals and Modification Proposals**

The SMKI PMA noted the update on [DP148 'IVP Extension for pre-SMETS2 v4.2 Devices'](#), and requested that SECAS provides further updates on this modification due to the potential impacts on SMKI. The SMKI PMA also noted updates on three Modification Proposals, which the SMKI PMA has previously agreed to monitor:

- [MP078 'Incorporation of multiple Issue Resolution Proposals into the SEC – Part 2'](#)
- [MP122B 'Operational Metrics – Part 2'](#)
- [MP128 'Gas Network Operators SMKI Requirements'](#)

## **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**

**8 January 2021**

#### **Attachments:**

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