**SECMP0056 ‘IHD / PPMID Zigbee Attributes Available on the HAN’**

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**Second Refinement Consultation responses**

About this document

This document contains the full collated responses received to the second SECMP0056 Refinement Consultation.

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

| Question 1 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | OVO believes this solution is key to ensuring there is no ambiguity when it comes to identifying a CoT has taken place and removed the need for the Device itself needing to establish this. |
| **Utilita** | Large Supplier | Yes | Utilita agrees with the principle of this change to allow for Zigbee attributes of Change of Tenancy (CoT) parameters to be available on In-Home Displays (IHDs) and Prepayment Interface Devices (PPMIDs). This solution for SECMP0056 should better facilitate SEC objectives (a) increases efficiency in operations, (c) improves customer journey and (f) ensuring further protection of data. |
| **Scottish Power** | Large Supplier | No | As a Large Supplier we fully support and comply with GDPR and the protection of customer data. After careful review of our smart processes and interaction with the smart metering Devices, and of the technical solution being delivered by this MOD, we do not believe that there is sufficient risk to customer data that justifies the cost of developing the partial solution presented in this MOD. Specifically, the change in the SR 3.2 CoT functionality is directed only at the ESME and GPF, but leaves the GSME data untouched. If there is a risk to GDPR breach, then it remains even after the implementation of this MOD. We believe this risk may be mitigated by processes around the CoT, as elucidated further in Q11 to 14 below, and by issue of Guidance instead of functionality change. |
| **EDF** | Large Supplier | Yes | We agree that it is critical to ensure that Consumers’ personal data is appropriately protected. We agree that the solution is appropriate if it is deemed that there is sufficient risk that customers’ personal data is left available to view on a PPMID or other HAN connected Devices following a CoT. However, it is for Suppliers to determine the level of risk associated with the data that they have sent or made available. If it is considered that the risk associated with the data is not material enough, then we are not sure that the solution and associated cost is necessary. |

Question 2: Will there be any impact on your organisation to implement SECMP0056?

| Question 2 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | Although there will be impacts to us in ensuring our Device Manufacturers are using the version of firmware that this change is applied to and upgrading our portfolio for older versions, including an explicit link to SECMP0007 being in place, all those impacts are completely outweighed by any, potential, risk to the wrong data being presented to the wrong customer. We do not believe these costs and impacts will be that high. It does depend on the agreed implementation approach. |
| **Utilita** | Large Supplier | Yes | The impact should be positive as this solution creates alignment with SMETS1. |
| **Scottish Power** | Large Supplier | No | No comment. |
| **EDF** | Large Supplier | Yes | We will be impacted should SECMP0056 be approved for implementation.  It is, however, very difficult to isolate and identify the impacts of making any one change as these changes will be made as part of a wider change to the Technical Specifications. We will incur a significant cost for moving to any new version of the Device Technical Specifications – the specific impacts associated with individual changes within those new versions is incredibly difficulty to identify. |

Question 3: Will your organisation incur any costs in implementing SECMP0056?

| Question 3 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | Cost, the same as the impacts listed in Question 2, will come from having new firmware and getting devices upgraded accordingly. These are not envisioned to be high costs and far outweigh the issue itself that this Mod addresses. |
| **Utilita** | Large Supplier | N/A | No comment. |
| **Scottish Power** | Large Supplier | No | No comment. |
| **EDF** | Large Supplier | Yes | It is very difficult to isolate and identify the impacts of making any one change as it will be made as part of a wider set of changes to the Technical Specifications. We will incur a significant cost for moving to any new version of the device Technical Specifications – the specific costs associated with individual changes within those new versions is incredibly difficult to identify. |

Question 4: Do you believe that SECMP0056 would better facilitate the General SEC Objectives?

| Question 4 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | We believe it will facilitate the General SEC Objective (f) as set out in the Modification Report. |
| **Utilita** | Large Supplier | Yes | As mentioned in Question 1, by enabling SMETS2 CoT events on an ESME and the GPF to reach HAN devices, the Proposed Solution should better facilitate SEC objectives (a) increases efficiency in operations, (c) improves customer journey and (f) ensuring further protection of data. |
| **Scottish Power** | Large Supplier | Yes | We believe this MOD in part better facilitates Objectives (a) and (f). |
| **EDF** | Large Supplier | Yes | We would agree that SECMP0056 would seem to better facilitate SEC Objective (f) as it would protect personal data from being viewed by a new tenant. Suppliers should determine their own level of risk that they might be exposed to as a result of not making this change, dependent on the messages they may or may not send to PPMIDs, and what capability they have for mitigating the risk of it being seen by a new tenant. While data privacy is incredibly important, it needs to be ensured that any changes have a cost that is proportionate to the risk and impact of any potential non-compliance. |

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0056 should be approved?

| Question 5 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | We believe this Mod should be approved. |
| **Utilita** | Large Supplier | Yes | Utilita believes the benefits and risk mitigation of this modification outweighs the cost.  Benefits include:  • ensures the protection of data on SMETS2 Devices.  • provides the new tenant with appropriate, relevant information for them to manage their own energy consumption. |
| **Scottish Power** | Large Supplier | No | See response to Q1. |
| **EDF** | Large Supplier | Yes | We agree in principle with implementing this change. However, it would not be appropriate for this to be a standalone deliverable within a SEC release; it should only be implemented as part of a wider CHTS change.  The costs of this change remain significant, even if it is included within a wider SEC release, and it is not clear that these costs are proportionate to the risk that the change is trying to mitigate. |

Question 6: How long from the point of approval would your organisation need to implement SECMP0056?

| Question 6 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | N/A | Our organisation will not be implementing the solution. It will be implemented by Device Manufacturers and we will be beholden to both the implementation approach and the availability of the firmware to be able to use this solution. |
| **Utilita** | Large Supplier | N/A | This should be in line with the soonest possible implementation date of the SEC Release. Furthermore, the mod implementation date should be carefully planned in order to be both cost and time efficient. |
| **Scottish Power** | Large Supplier | N/A | No comment. |
| **EDF** | Large Supplier | 6 months | We would require a minimum of 6 months for the changes in SECMP0056 to be included in the SEC.  What is not clear from the Modification Report are the changes that would be made to the TS applicability Tables, and whether Suppliers would be obliged to cut over to the new versions of the Technical Specifications, and if so, what the timeframes for doing so would be. If there is an obligation to cut over to the new versions of the Technical Specifications, Suppliers would probably need 18 months to 2 years to carry out this transition. |

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

| Question 7 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | Although the unknowns of the ECoS change should not impact this change but we support any plan to reduce costs to industry. |
| **Utilita** | Large Supplier | Yes | N/A |
| **Scottish Power** | Large Supplier | No | See response to Q1. |
| **EDF** | Large Supplier | Yes | We agree with the proposed implementation approach, and that the modification should only be implemented in a SEC Release that includes an uplift to the Technical Specifications. |

Question 8: Do you agree that these changes require a new principal version of GBCS, SMETS and MMC and sub-versions of CHTS?

| Question 8 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | No | The agreed versioning set out by BEIS, via TSIRS and TBDG, clearly stated that the only time a Principle Version change was needed was when a substantial change to the document in question was being made. This change is NOT substantial. That is a decision for those forums to discuss and agree. |
| **Utilita** | Large Supplier | Yes | Provided all Devices highlighted in these versions have been updated once implemented – not making Devices suddenly uncompliant once SECMP0056 implemented. |
| **Scottish Power** | Large Supplier | Yes | The changes would require uplift to the various Technical Specifications. |
| **EDF** | Large Supplier | Yes | We agree that the changes should be included in a new principal version of GBCS, SMETS and MMC; there is no clear rationale for creating new sub-versions of these Technical Specifications and obliging Suppliers to upgrade Devices to those new sub-versions. |

Question 9: Do you agree that the legal text will deliver SECMP0056?

| Question 9 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | We believe the legal text aligns and will deliver. |
| **Utilita** | Large Supplier | Yes | No comment. |
| **Scottish Power** | Large Supplier | No | If there was a risk to GDPR breach, then this MOD as it stands would reduce that for the ESME and PPMID, but that risk would remain for the GSME. |
| **EDF** | Large Supplier | Yes | We have no comments on the legal text. |

Question 10: Do you believe there will be any impacts on or benefits to consumers if SECMP0056 is implemented?

| Question 10 | | | |
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| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | The impacts relating to this change may be seen if this modification is NOT implemented, that is the point of this whole solution. To completely mitigate and reduce this from happening by providing the tools for Devices to use. |
| **Utilita** | Large Supplier | Yes | This will provide the new tenant with the appropriate information their own energy consumption. |
| **Scottish Power** | Large Supplier | Yes | If there was a risk to GDPR breach, then this MOD as it stands would reduce that for the ESME and PPMID, but that risk would remain for the GSME. |
| **EDF** | Large Supplier | Yes | Consumers will benefit from the implementation of this modification and the protection of private data where a CoT has occurred. However, we remain concerned about the level of cost and whether this is proportionate to the data protection risk that currently exists. |

Question 11: If you are a Supplier – do any or all of the IHDs / PPMIDs that you procure display personal messages? Please provide a percentage.  
If you are an IHD/PPMID Manufacturer – do any or all the IHD/PPMIDs that you produce display personal messages? Please provide a percentage.

| Question 11 | | | |
| --- | --- | --- | --- |
| Respondent | Category | Response | Rationale |
| **OVO** | Large Supplier | Yes | All the PPMIDs we’ve procured CAN have personal messages displayed. |
| **Utilita** | Large Supplier | No response | No comment. |
| **Scottish Power** | Large Supplier | Yes | All our currently procured Devices allow a message of up to 116 characters. |
| **EDF** | Large Supplier | Yes | Both Chameleon and Geo versions of our PPMID can display messages sent directly to the Device. |

Question 12a: If you are a Supplier – do you send or have you sent personalised messages to IHDs and PPMIDs?

| Question 12a | | |
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| Respondent | Category | Response and rationale |
| **OVO** | Large Supplier | No. OVO have not implemented this capability. |
| **Utilita** | Large Supplier | No comment. |
| **Scottish Power** | Large Supplier | No. We only send generic messages, such as “Welcome to the benefits of Smart Metering”. Significant personalised messages are difficult due to the limitation of 116 characters and uncertainty of whether the consumer has switched off their PPMID. Those are better handled through traditional post or by email, depending on the consumer’s communication preferences. The PPMID is not a recognised communication channel by our systems. |
| **EDF** | Large Supplier | Yes. |

Question 12b: Is it possible that these messages contain information such as customer name, debt, tariff, and any other information that could be deemed personal in accordance with the GDPR?

| Question 12b | | |
| --- | --- | --- |
| Respondent | Category | Response and rationale |
| **OVO** | Large Supplier | No, as we do not send messages. |
| **Utilita** | Large Supplier | No comment. |
| **Scottish Power** | Large Supplier | No. See response to Q12a. |
| **EDF** | Large Supplier | Yes. Our automated messaged do not contain information such as customer name, debt, tariff, and any other information that could be deemed personal in accordance with the GDPR.  It is possible that free format messages could contain such information if the author was untrained, However, we have controls in place to restrict these messages being sent. |

Question 13: Suppliers – do you reset the debt information on PPMIDs by setting the meter to credit mode and then resetting the meter back to prepayment mode?

| Question 13 | | |
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| Respondent | Category | Response and rationale |
| **OVO** | Large Supplier | No. Debt can be ADJUSTED (updated) without needing to change the meter mode. There is no ability to reset any values in the solution. |
| **Utilita** | Large Supplier | No comment. |
| **Scottish Power** | Large Supplier | Yes. Our CoT process wipes all debt and other prepayment related data from both ESME and GSME, in the manner described in the question. |
| **EDF** | Large Supplier | No comment. |

Question 14: Please provide any further comments you may have

| Question 14 | | |
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| Respondent | Category | Comments |
| **OVO** | Large Supplier | Not at this time. |
| **Utilita** | Large Supplier | No comment. |
| **Scottish Power** | Large Supplier | We believe the risks to GDPR may be better mitigated though Guidance on messages to PPMID and the CoT process used by Suppliers, instead of a functionality change that covers ESME and GPF, but leave out GSME. |
| **EDF** | Large Supplier | While we agree that it is critical to ensure that Consumers’ personal data is appropriately protected. The key concern we have is whether the Proposed Solution is either appropriate or necessary.  Suppliers should determine their own level of risk that they might be exposed to as a result of not making this change, dependent on the messages they may or may not sent to PPMIDs, and what capability they have for mitigating the risk of it being seen by a new tenant. While data privacy is incredibly important, it needs to be ensured that any changes have a cost that is proportionate to the risk and impact of any potential non-compliance.  We note that PPMIDs are not currently capable of being upgraded remotely, and even if SECMP0007 were to be approved it might not be possible to upgrade Devices provided before this Modification comes into effect. If existing Devices cannot be upgraded would we not consider the materiality of the risk to be sufficient for them to be replaced? If that replacement is not deemed necessary, it would seem to undermine the benefits associated with this modification. We will be impacted should SECMP0056 be approved for implementation.  It is, however, very difficult to isolate and identify the impacts of making any one change as these changes will be made as part of a wider change to the Technical Specifications. We will incur a significant cost for moving to any new version of the Device Technical Specifications – the specific impacts associated with individual changes within those new versions is incredibly difficulty to identify.  Any new version of the Technical Specifications will have the following impacts, amongst others:  • Engaging with Device Manufacturers to procure Devices compliant with the revised versions of the Technical Specifications  • Testing of existing Devices that are deemed compatible with the revised versions of the Technical Specifications  • Testing of the new Devices to ensure they are compliant  • Operational transition from installation of the previous version of Devices to the new version  • Design build and test changes to our internal systems to comply with the new versions of the Technical Specifications  • Regression testing of the new versions the Technical Specifications against current.  • E2E testing of the new version of the Technical Specifications in the DCC UIT environment  • Transition to the new version of the Technical Specifications  • Post-implementation support for the new version of the Technical Specifications |

**Smart Energy Code Administrator and Secretariat (SECAS)**

8 Fenchurch Place, London, EC3M 4AJ

020 7090 7755

secas@gemserv.com

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8 Fenchurch Place, London, EC3M 4AJ

020 7090 7755

secas@gemserv.com