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Paper Reference:	**SECP_91_1604_16**
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
MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4'	• **AGREE** that MP099 should be progressed to the Report Phase; • **APPROVE** the Modification Report; • **APPROVE** the implementation approach; and • **AGREE** that MP099 should be progressed as a Self-Governance Modification.
MP144 'Charging of Random Sample Privacy Assessments'	• **AGREE** that MP144 should be progressed to the Report Phase; • **APPROVE** the Modification Report; • **APPROVE** the implementation approach; and • **AGREE** that MP144 should be progressed as a Self-Governance Modification.
DP153 'Follow up changes for Communications Hub Finance Charges'	• **AGREE** that DP153 should be converted to a Modification Proposal; • **AGREE** that MP153 should be progressed and approved as a Fast Track Modification (*the Panel must be unanimous for this to be passed*); • **APPROVE** the Modification Report; and • **APPROVE** the implementation approach.

3. Points to note

MP153 – progression as Fast Track

We recommend that MP153 is progressed and approved as a Fast Track Modification. This change is proposing to correct a minor error with the SEC arising from a previous modification, and we believe this meets the criteria in SEC Section D2.8 to be a Fast Track Modification.

The Panel must be unanimous to progress and approve a modification as a Fast Track Modification. Parties will then have a 15 Working Day period in which they can object to the Panel's decision. If no objections are received, the Panel's approval of the change will be final.

Ali Beard

SECAS Team,

9 April 2021

Attachments:

- **Appendix A:** MP099 draft Modification Report
- **Appendix B:** MP099 DCC Impact Assessment response with cost breakdown (**RED**)
- **Appendix C:** MP144 draft Modification Report
- **Appendix D:** DP153 draft Modification Report

SEC
Smart Energy Code

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Smart Energy Code

MP099

'Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 4'

Modification Report

Version 0.5

9 April 2021

Corporate member of Plain English Campaign
Committed to clearer communication
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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 business requirements for the 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) Impact Assessment response.
- **Annex D** contains the full responses received to the Refinement Consultation.

Contact

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

Khaleda Hussain

020 7770 6719

Khaleda.Hussain@gemserv.com

1. Summary

This proposal has been raised by Chun Chen from the DCC.

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 two IRPs included in this modification. The first (IRP571) is aimed at ensuring the Gas Proxy Function (GPF) does not share historical data with other Home Area Network (HAN) Devices, where the Device has no meaningful time and where there has been at least one Change of Tenancy (CoT) recorded on the Device since installation. The second (IRP586) is to ensure the GPF will align to the Great British Companion Specification (GBCS) requirements when providing snapshots to HAN Devices. It is also to ensure the Gas Smart Metering Equipment (GSME) will align to Zigbee standards.

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

The total cost to implement this modification will approximately be £307,683 and require a timescale of eight months to complete. It will impact Large Suppliers, Small Suppliers, Other SEC Parties and the DCC. This modification will be targeted for the June 2022 SEC Release, if approved as a Self-Governance Modification.

2. Issue

What are the current arrangements?

IRP571

Currently, the GPF and the Electricity Smart Metering Equipment (ESME) pick up data consumption information so long as those Devices have a Greenwich Mean Time (GMT) timestamp attached to them. This data information is then stored and shared across other HAN Devices.

IRP586

Currently, the GBCS explicitly requires that, when reading logs, log entries returned are inclusive of any with a time stamp equal to the 'toDateTime' command. However, in the Zigbee Specification there are several cases which are open to interpretation regarding the inclusivity and exclusivity of time stamp which is causing inconsistency. As a result, the ESME, the GSME and the GPF are not behaving in the same way when returning time stamp values.

What is the issue?

IRP571

The issue is where there are edge cases, such as briefly after a power restoration at a premise, the Devices might not have a UTC attached to the data consumption. This issue is being applied to historical data on Devices.

IRP586

There is an inconsistency on the 'EndDateTime' value in the GBCS command. There is a second missing on the time value stamp.

The IRPs included in this proposal, listed below, require changes to the GBCS with initial key impacts identified by Smart Energy Code Administrator and Secretariat (SECAS) in the table below.

What is the impact this is having?

IRP571

The impact is there is a risk of historical information, such as data consumption by a previous tenant of the premise, being shared across HAN Devices. This causes a General Data Protection Regulation (GDPR) issue. Furthermore, there is a chance that In Home Devices (IHD) could display data consumption associated with an incorrect time. This would impact the consumer as it would be providing misleading data information thus preventing them from changing tariffs to benefit them.

IRP586

The impact is the GSME log entries, with an invalid time, will not be captured and read accordingly. It will also continue to be different to the way the ESME and GPF log entries are read. This will cause inconsistency on the data consumption reading for GSME, which will reflect inaccurate data. Currently, the lack of clarification in the command which is open to interpretation is causing inconsistency.

Impact on consumers

This change will benefit consumers as they will have the most up to date Devices according to the Technical Specification.

Proposed IRPs							
IRP number	**IRP title**	**Impacted Technical Specification**	**IRP document**	**Impacted Users**	**Devices Impacted**	**Complexity**	**Notes**
IRP571	Historic Data when Device does not know the time	GBCS	IRP571 Historic Data when Device does not	• Gas Suppliers • Electricity Suppliers	• GSME • ESME	Low	Limited / no impact on GS.
IRP586	Modify use cases so ESME GSME & GPF behave in the same way (exclusion options)	GBCS	IRP586 Modify use cases so ESME GSME	• Gas Suppliers	• GPF	Middle	impact on Users. impact on GPF.

3. Solution

Proposed Solution

IRP571

The proposed solution is to ensure the GBCS specifies that the GPF and ESME should not share historical data with other HAN Devices. This rule will be applied in the instances where the Device has no meaningful time and where there has been at least one change of tenancy recorded on the Device since installation.

IRP586

The proposed solution is to ensure the GBCS is explicit that the GPF will align to GBCS and ESME requirements for remote Party commands and when providing snapshots to HAN Devices. The proposed solution will also ensure the GSMEs will align to Zigbee standards.

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

Suppliers and Other SEC Parties are impacted as they would potentially 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 content of the solution put forward and agreed that it should be implemented. However, the Large Supplier highlighted the creation of new sub-versions of GBCS would require all Devices installed compliant with the previous sub versions to be upgraded.

The concern raised by the Large Supplier applied to Devices that could not be upgraded, which would mean that it would no longer be compliant with Supplier obligations to maintain Devices to a valid version of the Technical Specifications.

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:

- GBCS Integration Testing For Industry (GFI) tool
- The Communications Hub Detailed Specification (CH02)

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

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 8 'Great Britain Companion Specifications' (GBCS)
- 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:

- GBCS v4.x

These changes will also be applied to any new Principal Versions of this document that subsequently become effective on or before the MP099 implementation date.

Consumers

Without these corrections being implemented, Manufacturers are impacted as their Devices are unable to provide an accurate service to consumers.

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 total DCC implementation cost to implement this modification is £307,683. The breakdown of these cost are as follows:

Breakdown of DCC implementation costs	
Activity	**Jun 22 Release cost**
Design, Build and Pre-Integration Testing (PIT)	£188,446
Systems Integration Testing (SIT)	£89,238
User Integration Testing (UIT)	NIL
Implement to Live	NIL

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

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.

SEC Party costs

One respondent to the Refinement Consultation advised they would incur cost through testing of new firmware Devices. They highlighted the cost will be higher if they were required to upgrade Devices which they already installed to be compliant with the new version of the GBCS.

6. Implementation approach

SECAS is recommending an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 3 March 2022.

As the change impacts Technical Specifications, the modification should be implemented in a SEC Release that included an uplift to those documents. The next SEC Release that is targeted to include new versions of the GBCS is the November 2022 SEC Release.

If, following a decision and allowing enough lead time, an earlier Release is approved to make updates to the relevant Technical Specifications, the Panel may request that this modification be moved to that Release. The DCC's total lead time to implement this change, including the post-PIT stages, is eight months.

7. Assessment of the proposal

Observations on the issue

Views of the TSIRS

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.

Views of the Change Sub-Committee

The Change Sub-Committee (CSC) agreed that this Draft Proposal clearly outlines an issue.

The CSC believed that this should be able to catch up and be combined with MP078 'Incorporation of multiple Issue Resolution Proposals into the SEC - Part 2', if the DCC could deliver the DCC System changes required in time. However, the progress of MP078 has fallen behind that of MP099 but both are still targeted for the November 2022 SEC Release.

Solution Development

The issues and the solutions have been discussed and agreed upon by the TSIRS. Although the TSIRS is a BEIS led group, various SEC Parties are represented. The TSIRS agreed the solutions and agreed they should be implemented into the SEC.

SECAS presented MP099 to the Working Group who noted the costs and lead time outlined in the DCC Impact Assessment. A Working Group member advised the business benefit case for IRPs is correcting defects that have been identified. It was suggested at the Working Group that IRPs should take a different approach whereby a justification is not required as they have been approved and passed through the TSIRS. However, SECAS advised members the modification process requires a business case to justify the changes it is proposing to make. Members of the Working Group

commented that business cases are not discussed at TSIRS. SECAS acknowledged the comments received from the Working Group regarding the business case and followed up with the BEIS TSIRS representative why the TSIRS believed these IRPs need to be implemented via a modification. This information can be found under the 'business case' section below.

Views of Sub-Committees

SECAS presented MP099 and the Impact Assessment findings to the Technical Architecture and Business Architecture Sub-Committee (TABASC) for feedback. The TABASC highlighted that given MP099 includes changes to the GPF, this modification would be best implemented along with all other Communication Hub changes, which at the time was expected to be the June 2022 SEC Release.

The TABASC members queried whether the Network Evolution Communications Hub will have this modification built into it. The DCC advised that the Network Evolution Communications Hub will have the functionality built in and will not require any additional changes.

SECAS also presented MP099 to the Security Sub Committee (SSC) regarding IRP571 which demonstrated a security and privacy concern. The SSC agreed the IRP was an edge case and Suppliers were accepting of the issue. The DCC SSC representative confirmed the level of risk associated with IRP571 is very low. The SSC agreed it did not require any further risk assessment on this IRP.

Support for Change

Working Group

The Working Group agreed that these IRPs need to be implemented to resolve the identified issues.

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 MP099 will benefit the industry as Devices will be performing accurately. It will also add clarity and consistency across the Specification.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that MP099 would better facilitate SEC Objective (a)[1], as these IRPs resolve issues with the Technical Specifications which are the minimum requirements for Device manufacturers.

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

Industry views

One response was received to the Refinement Consultation. A Large Supplier believed the modification should be approved as these IRPs resolve issues within the Technical Specification and will ensure Devices operate correctly. However, the Large Supplier did state it would be impacted if MP099 was implemented. It advised it would need to ensure Devices it procures and is responsible for are compliant with the new version of the GBCS. The Large Supplier did remain supportive of the MP099 and agreed the modification effectively facilitates the SEC Objective.

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 as the Devices will operate as they should per the Technical Specification.

Benefits for society as a whole

The change is neutral against this area.

Appendix 1: Progression timetable

This Modification Report will be presented to the Panel on 16 April 2021. A Modification Report Consultation (MRC) will then be issued before the Modification is presented to Change Board for vote.

Timetable	
Action	**Date**
Draft Proposal raised	12 Dec 2019
Presented to CSC for comment and recommendations	2 Jan 2020
Panel converts Draft Proposal to Modification Proposal	17 Jan 2020
Preliminary Assessment requested	3 Feb 2020
Preliminary Assessment returned	17 Mar 2020
Modification discussed with Working Group	1 Apr 2020
Refinement Consultation	17 Apr – 11 May 2020
Impact Assessment requested	29 Apr 2020
Impact Assessment returned	21 Dec 2020
Modification discussed with TABASC	4 Feb 2021
Modification discussed with Working Group	3 Mar 2021
Modification discussed with SSC	10 Mar 2021
Modification Report approved by Panel	16 Apr 2021
Modification Report Consultation	19 Apr – 10 May 2021
Change Board Vote	26 May 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**
BEIS	Department of Business, Energy, and Industrial Strategy
CoT	Change of Tenancy
CH02	Communications Hub Detailed Specification
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
ESME	Electricity Smart Metering Equipment
GBCS	Great Britain Companion Specification
GDPR	General Data Protection Regulation
GFI	GBCS Integration Testing For Industry

Glossary	
Acronym	**Full term**
GMT	Greenwich Mean Time
GSME	Gas Smart Metering Equipment
GPF	Gas Proxy Function
HAN	Home Area Network
IHD	In Home Devices
IRP	Issue Resolution Proposal
PIT	Pre-Integration Testing
MRC	Modification Report Consultation
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SSC	Security Sub Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSIRS	Technical Specifications Issue Resolution Sub-Group
TSAT	Technical Specifications Applicability Tables
UIT	User Integration Testing

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MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4'

Annex A

Business requirements – version 1.0

About this document

This document contains the business requirements for this Modification Proposal. It provides detailed information on the business requirements for the Proposed Solution agreed by the Proposer, with input from the Data Communications Company (DCC) and Sub-Committees. It also provides the considerations and assumptions for each business requirement with respect to this Modification Proposal.

1. Business requirements

This section contains the functional business requirements needed for each Issue Resolution Proposal (IRP) contained within MP099 that the DCC have indicated could be DCC System impacting. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	**Requirement**
1	DCC System changes for IRP571 'Historic Data when Device does not know the time'
2	DCC System changes for IRP586 'Modify use cases so ESME GSME & GPF behave in the same way (exclusion options)'

2. Considerations and assumptions

2.1 General

This section contains the considerations and assumptions for each business requirement. These are excerpts from each of the Issue Resolution Proposals (IRPs) and it is expected that the DCC will develop solution(s) to the consequential changes these IRPs will have on the DCC Systems. The document text changes are contained within each of the IRPs.

2.2 Requirement 1: DCC System changes for IRP571 'Historic Data when Device does not know the time'

To avoid the risk of sharing historic data with other Home Area Network (HAN) Devices, that may relate to a prior tenant, the proposed drafting is that the Gas Proxy Function (GPF) and Electricity Smart Metering Equipment (ESME) should not share historic data from this store with other HAN Devices where:

- The Device has no meaningful time; and
- There has been at least one change of tenancy recorded on the Device since its installation.

2.3 Requirement 2: DCC System changes for IRP586 'Modify use cases so ESME GSME & GPF behave in the same way (exclusion options)'

SEC Schedule 8 'GB Companion Specifications' (GBCS) explicitly requires that, when reading logs, the log entries returned are inclusive of any with a timestamp equal to the 'toDateTime' in the Command. And ZigBee is, in a number of cases, explicit on inclusivity, open to interpretation as to such inclusivity or exclusivity and, in one case, at odds with it.

This IRP is to add drafting in GBCS to make explicit that:

- For GPF the behaviour is to align to the GBCS requirements and so to ESME, in relation both to Remote Party Commands to read logs and in supporting GetSnapshot and GetPrepaySnapshot as a server (so when providing snapshots to HAN Devices);
- For Gas Smart Metering Equipment (GSME) the behaviour is to align to ZigBee, and so be different than GPF and ESME. This affect Use Cases GCS15b, GCS15c, GCS16a, GCS16b, CS10a and CS10b which would explicitly state that GSME return entries exclusive of the 'toDateTime', unlike other Devices.

Note that, with this resolution, it would not be possible to retrieve, from the GSME Billing Data Log (consumption registers), GSME Security Log, GSME Event Log, GSME Daily Read Log or GSME Prepayment Daily Read Log entries with a timestamp value meaning 'unknown' (so 0xFFFFFFFF in ZigBee).

Please refer to the IRP586 document for full details and what the GBCS Work Group expects of the Data Service Provider (DSP).

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**
DCC	Data Communication Company
DSP	Data Service Provider
ESME	Electricity Smart Metering Equipment
GBCS	GB Companion Specifications
GPF	Gas Proxy Function
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
IRP	Issue Resolution Proposal

Data Communications Company

SEC Modification Proposal, SECMP0099

DCC Change Request 1297

Incorporation of Multiple Issue Resolution Proposals (IRPs) into the SEC – Batch 4

Full Impact Assessment (FIA)

Version:	**0.3**
Date:	**9th December, 2020**
Author:	**DCC**
Classification:	**DCC Public**

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1 Executive Summary

The Change Board are asked to approve the following:

- Total cost to implement SECMP0099 of £307,683 (see section 6.2 for a breakdown) as a standalone release
- The timescales to complete the implementation of eight (8) months
- Include SECMP0099 as part of the November 2021 SEC Systems Release

Benefit Summary

IRPs 571 and 586 add clarity and corrections to the Technical Specifications documents. Device manufacturers are required to follow these documents for the specifications of their Devices.

The solution for IRP571 will ensure the proposed drafting for the GPF and ESME should not share historic data from this store with other HAN Devices where:

- The Device has no meaningful time
- There has been at least one change of tenancy recorded on the Device since installation

The solution for IRP586, using drafting in GBCS will make it explicit that:

- The GPF will align to GBCS requirements and an ESME for Remote Party Commands and when providing snapshots to HAN devices
- GSMEs will align to Zigbee standards and are different from GPF and ESMEs

It should be noted that these issues have already been addressed by defect fixes in CSP North devices, and as part of this Modification, CSP North will make no cost changes to their documentation.

2 Revision History

Revision Date	Revision	Summary of Changes
15/07/2020	0.1	Initial compilation from Service Provider
20/11/2020	0.2	Challenge by DCC, Service Providers publish new version.
9/12/2020	0.3	DCC internal review completed

2.1 Associated Documents

This document is associated with the following documents:

#	Title and Originator's Reference	Source	Issue Date
1	MP099 Business-Requirements	SECAS	19/02/2020
2	DP099 Problem-Statement	SECAS	12/12/2019
3	SECMP0099 CR1297 – PIA – IRPs into SEC Part 4 v0.5	DCC	16/04/2020

2.2 Document Information

The Proposer for this Modification is Chun Chen of SmartDCC. The original proposal was submitted on the 12th December 2019.

The Preliminary Impact Assessment (PIA) was requested of DCC on 4th February 2020, and submitted on 16th April, 2020.

The Full Impact Assessment was requested on the 11th May 2020. Initial responses from the Service Providers were challenged on the basis of costs and content and resulted in the further releases of the FIA responses by both CSP North as well as CSP South and Central.

This document should be treated as a Confidential document and must be treated as a RED basis for SECAS distribution.

3 Solution Requirements and Overview

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

The SEC Definitions, issue statement, and requirements following have been provided by SECAS, TSIRS and the Proposer.

3.1 Context

Issue Resolution Proposals (IRPs) identify issues within the SEC Technical Specification documents and put forward a solution to the identified problem. In the early stages of the Smart Metering Implementation Program, BEIS took the lead in developing the Technical Specifications that sit under the SEC. As part of this, BEIS also took responsibility for receiving and responding to issues raised internally, by the DCC, and by other interested industry parties. Since its inception, several hundred issues have been raised in relation to technical specifications under the SEC through the Technical Specification Issue Resolution Sub-Group (TSIRS). In some cases, these queries have been resolved by providing an explanation of the specifications, whilst others have resulted in proposed amendments to the specifications in the form of IRPs.

BEIS has previously implemented the required IRPs via BEIS-led designations; however, this process has now been handed over to SECAS for changes to be implemented through the Modifications Process. To improve efficiency, it was agreed these changes should be progressed under a single proposal at regular intervals. This will be the fourth batch of these changes.

3.2 Issue

In general, IRPs add clarity and corrections to the Technical Specification documents. Device manufacturers are required to follow these documents for the specifications of their Devices. Therefore, any errors or miscommunication of these specifications will mean the Device will not work as intended. TSIRS have agreed that these are issues and have agreed upon the solutions. Not implementing these solutions would mean that these problems would not be resolved.

3.3 Business Requirements

This section contains the considerations and assumptions for each business requirement. Excerpts from each of the IRPs and it is expected that the DCC will develop solution(s) to the consequential changes these IRPs will have on the DCC Systems. The document text changes are contained within each of the IRPs.

The following table contains supporting information about each IRP as well as the IRP title.

#	Requirement	Impacted Users	Impacted Devices	Complexity
1	IRP571, 'Historic Data when Device does not know the time'	Gas Supplier, Electricity Suppliers	GSME, ESME	Low
2	IRP586, 'Modify use cases so ESME, GSME, and GPF behave in the same way	Gas Supplier	GPF	Medium

Table 1: Business Requirements for SECMP0099, CR1297

3.3.1 Req. 1: IRP571 'Historic Data when Device does not know the time'

To avoid the risk of sharing historic data with other Home Area Network (HAN) Devices that may relate to a prior tenant, the proposed drafting is that the Gas Proxy Function (GPF) and Electricity Smart Metering Equipment (ESME) should not share historic data from this store with other HAN Devices where:

- The Device has no meaningful time
- There has been at least one change of tenancy recorded on the Device since installation

Further details on IRP571 are included in the attached file: IRP571 Historic Data when Device does not.

Note this file is as provided by BEIS and has not been edited or updated in any way.

3.3.2 Req. 2: IRP586 'Modify use cases so ESME, GSME, and GPF behave in the same way'

SEC Schedule 8 'GB Companion Specifications' (GBCS) explicitly requires that, when reading logs, the log entries returned are inclusive of any with a timestamp equal to the 'toDateTime' in the Command.

ZigBee is, in a number of cases, explicit on inclusivity, open to interpretation as to such inclusivity or exclusivity and, in one case, at odds with it.

Further details on IRP586 are included in the attached file: IRP586 Modify use cases so ESME GSME

This file is as provided by BEIS and has not been edited or updated in any way.

Note: there are two versions of this IRP. CSP North's response is the same although the system behaviour will be slightly different.

3.4 Business Benefits

The solution for IRP571 will ensure the proposed drafting for the GPF and ESME should not share historic data from this store with other HAN Devices where:

- The Device has no meaningful time
- There has been at least one change of tenancy recorded on the Device since installation

In IRP586, the drafting in GBCS will make it explicit that

- The GPF will align to GBCS requirements and an ESME for Remote Party Commands and when providing snapshots to HAN devices
- GSMEs will align to Zigbee standards and are different from GPF and ESMEs

4 Solution Overview

IRPs 571 and 586 add clarity and corrections to the Technical Specifications documents. Device manufacturers are required to follow these documents for the specifications of their Devices.

4.1 DSP Solution

To support the GBCS changes introduced by IRP571 and IRP586, no changes to the DSP technical solution are required.

Integration testing as defined following will require work from the System Integrator and is detailed in section 5 below.

4.2 CSP North Solution

For IRP571, The current behaviour of the Communications Hub is that when a Change of Tenancy (CoT) restriction is set which covers historical data the GPF maintains (i.e. the last 13 months) the data is not shared when the Communications Hub does not have meaningful time (set by the SM WAN at least once post boot). This was changed in the Maintenance Release 2.1 (Single Band Communications Hub firmware 2.03.x/Dual Band Comms Hub firmware 2.13.x releases) while fixing defect IP-8600. An EDMI technical requirement and test case shall be added to ensure Communications Hub firmware continues to align to this requirement. The internal EDMI requirement shall become ‘a shall’ rather than ‘should’ as required by GBCS.

For IRP586, the change seeks to clarify if the ‘Latest End Time’ when specified to read log entries over a time range is inclusive or not. DLMS defines it as inclusive and ZigBee mostly defines this as exclusive. This has the effect of making it impossible to read items in a log with a timestamp of 0xFFFFFFFF (unreliable time) from ZigBee end devices (including the GPF). The EDMI Communications Hub is currently aligned to this IRP (see table below).

GBCS Use Case	Comms Hub behaviour in 2.03.x/2.13.x firmware Inclusive of ‘Latest End Time’	Notes
GCS15b Read GSME Billing Data Log (change of mode/tariff triggered)	Yes (ZigBee)	Already aligned to expected IRP586 by fixing defect (CIP186/SMJTT-1726/ IP-6278)
GCS15c Read GSME Billing Data Log (billing calendar triggered)	Yes (ZigBee)	Already aligned to expected IRP586 by fixing defect (CIP186/SMJTT-1726/ IP-6278)
GCS16a Read GSME Daily Read log(s)	Yes (ZigBee)	Already aligned to expected IRP586 by fixing defect (CIP186/SMJTT-1726/ IP-6278)
GCS16b Read GSME Daily Read log(s) (prepayment)	Yes (ZigBee) Already aligned to expected IRP586 by fixing defect (CIP186/SMJTT-1726/ IP-6278)	

CS10a Read Zigbee Device Event Log	Yes (ZigBee)	Changed functionality while fixing CIP926
CS10b Read Zigbee Device Security Log	Yes (ZigBee)	Changed functionality while fixing CIP926

4.3 CSP South and Central

To deliver this Modification, CSP South and Central's suppliers will uplift the Communications Hub software to address the business requirements listed above as follows.

- Implement event logs changes to allow remote parties to retrieve the event logs which include timestamp value 0xFFFFFFFF
- Ensure the CH can add new events to logs irrespective of the status of the time synchronisation.

In their first FIA response, CSP South and Central provided estimates and a plan to provide these changes as a standalone release. However after discussion with the DCC, CSP South and Central revised their implementation method to use a standard Firmware Management Policy (FMP) release, leading to significantly reduced regression testing and project support costs. The FMP is more appropriate in cases where there is a relatively small functional change to Comms Hub firmware, taking advantage of existing programmes who provide services such as testing and CPA, rather than up separate projects or programmes to accommodate small changes.

The Communications Hub Detailed Specification (CH02) will be updated to match the changes.

5 Testing Considerations

This Full Impact Assessment includes the cost to develop, fully test and deliver this SEC Modification.

5.1 DSP Testing

From a DSP SIT perspective, this impacts SMETS2 only and involves the following:

1. SMETS 2 devices to be used for testing and the GBCS and SMETS2 versions to be tested against will be defined by the CSPs at the time of execution of this testing.

2. Creation of two new test scenarios and test scripts.

a. One new scenario and test script to execute the GSME use cases and associated SRVs to verify that the response contains entries between “FromDateTime” to “Todate Time”

b. One new scenario and script to execute the ESME and GPF use cases and associated SRVs to verify that the response contains entries between “FromDateTime” to “Todate Time” inclusive.

3. Execution of the scenarios for each defined device set;

It is assumed that regression testing will be covered by the wider release within which this change is implemented.

The change is assumed to require triage support.

5.2 CSP North Testing

CSP North will ensure their technical requirements and test case continue alignment to IRP571 and IRP586.

At the point of writing this Impact Assessment, the changes required for IRP571 and IRP586 have already been delivered in existing Maintenance Release 2.1 Single Band Communications Hub 2.03.x firmware and Maintenance Release 2.1 Dual Band Communications Hub 2.13.x firmware. Consequently, there is no requirement for CSP North to conduct any testing.

5.3 System Integrator Effort

There will be a requirement for SI Release Management to coordinate deployment of the CSP functionality to B-Stream environments (SIT-B and UIT-B), A-Stream environments (SIT-A and UIT-A) and finally into Production.

5.4 CSP South and Central Testing

CSP South and Central will uplift the SLS Device Emulator test stub capability to align Meter and PPMID behaviour with IRP571 and 586, allowing the assurance of the Communication Hub software uplift.

CSP South and Central will add new test scripts as part of the set of test scripting tools used for regression testing in order to automate some of the testing involved for this Modification. The delivery plan for CSP South and Central is shown following.

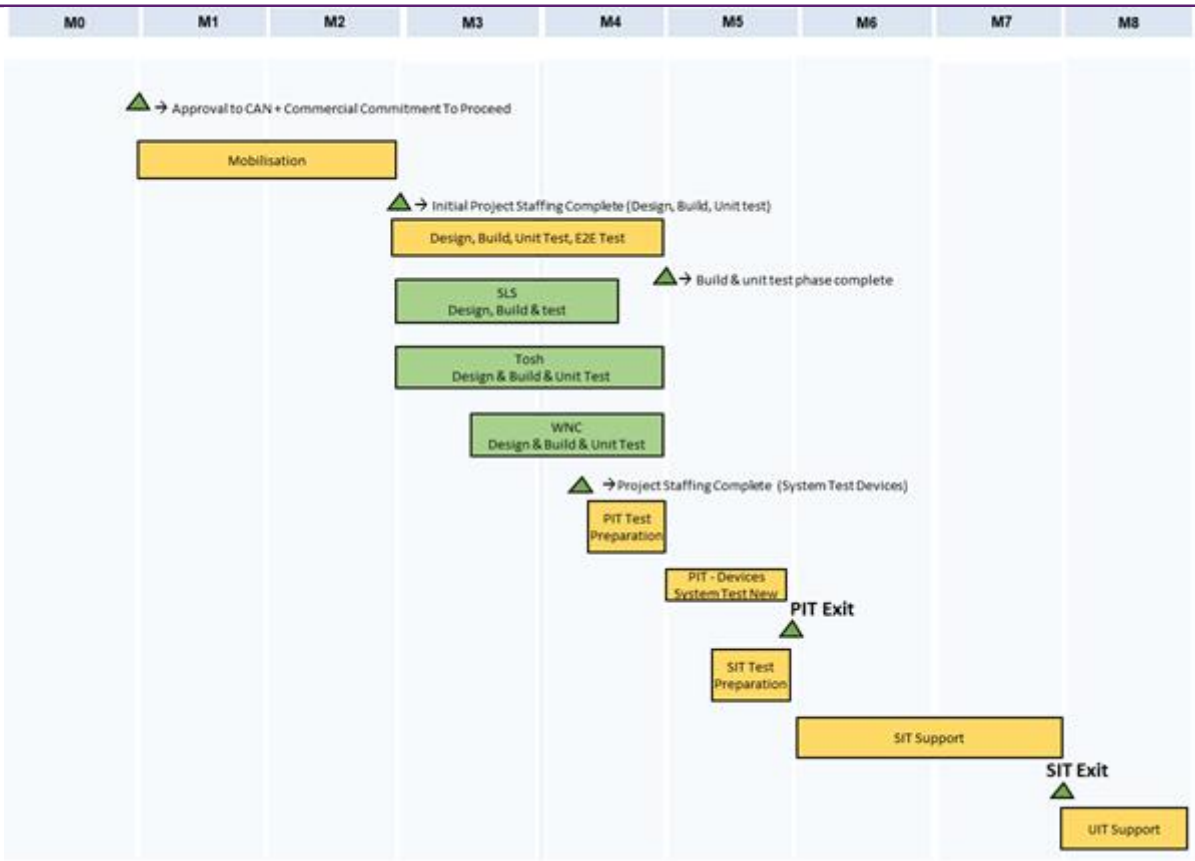

Figure 1: CSP South and Central Plan

Updates to the SLS Emulator and CSP South and Central ACB Emulator will be included as part of the Release CR, and those costs and efforts will be part of that CR.

5.5 Pre-Integration Testing

Pre-Integration Testing (PIT) will be required to align DSP functionality and the functionality described above. The development team will carry out unit testing and the build will be subject to continuous build and automated testing to identify build issues at the earliest opportunity. The implementation team will carry out system testing consisting of positive and negative path testing.

In this stage CSP South and Central will design, build and system test modifications to test tooling required to assure the CSP solution in the PIT environment. By using the FMP approach, no additional PIT CH, test hardware or software needs to be procured.

5.6 System Integration Testing and User Integration Testing

The SIT phase of testing will be aligned with other Modifications and Change Requests in a SEC Release, which is currently set as the November 2021 release.

This Modification impacts both SMETS1 and SMETS2. However the new functionality does not need to be tested against each Device Meter Combination (DMC) or repeated for each CSP.

SMETS1 testing will include:

- Any DMCs from CGI IE and Secure and FOC to be used as Device Sets
- Brand new device sets not migrated as yet
- Two dual fuel Active Sets and One Single Fuel Active Device Set for FO

For SMETS2 testing, the test execution is to be spread across the different CHF types and will require at least four new dual device sets which are Not Installed and Not Commissioned.

The scope of this testing will be detailed in a heatmap and Solution Test Plan associated to the release that this will be delivered against, as SIT completes Solution Test Plans for a SEC Release, and not for individual CRs. This will be included as part of the November 2021 SEC Release.

Following each of the SMETS1 and SMETS2 tests, the ESI reports listed at the end of Section 4 will be executed, to check that the DCC Service Status is reflected correctly in these reports for the Device Sets under test.

There is no requirement to test this Modification in the UIT environments.

CSP South and Central testing requirements specify a 2-week window for Device Set Up which gives reasonable contingency for onsite working restrictions which may be in place at the time of set up due to Covid-19.

The CSP South and Central testing requires 5 SIT test sets and will be executed over 4 weeks - this is based on an average calculation based against previous test activity. DCC have challenged the level of testing proposed for a relatively simple change.

6 Implementation Timescales and Releases

This Modification was expected to be included in a SEC release in November 2021. Implementation timescales will be finalised as part of the relevant SEC Release Change Request.

6.1 Change Lead Times and Timelines

From the date of approval (in accordance with Section D9 of the SEC), to implement the changes proposed DCC requires a lead time of approximately **8 months**.

The broad breakdown of the testing regime is shown in the following table in months after an approval decision date (D).

Phase	Duration
SECAS agreement on scope of release	
CAN signature, CSP South and Central Mobilisation starts	D + 1 Month
Design, Build and PIT Phase	D + 5 Months
SIT and UIT Phases Complete	D +8 Months
Transition to Operations and Go Live	D + 8 Months

6.2 Costs and Charges

This section indicates the quote per application phase for this Modification.

£	Design	Build	PIT	SIT	UIT	TTO	SP Total
Phase Total	14011	85197	89238	89238			**307,683**

Design	The production of detailed System and Service designs to deliver all new requirements.
Build	The development of the designed Systems and Services to create a solution (e.g. code, systems, or products) that can be tested and implemented.
Pre-Integration Testing (PIT)	Each Service Provider tests its own solution to agreed standards in isolation of other Service Providers. This is assured by DCC.
Systems Integration Testing (SIT)	All the Service Provider's PIT-complete solutions are brought together and tested as an integrated solution, ensuring all SP solutions align and operate as an end-to-end solution.
User Integration Testing (UIT)	Users are provided with an opportunity to run a range of pre-specified tests in relation to the relevant change.

Implementation to Live (TTO)	The solution is implemented into production environments and made ready for use by Users as part of a live service.

It should be noted that no savings would be generated by grouping these into a Release. The nature of the Firmware Management Policy has already resulted in savings to the charges above.

6.3 Application Support

It is assumed that this change will not result in a material increase in support required however an allowance has been included in the System Integrator charges to allow knowledge transfer to the DSP Application Support team to ensure any issues can be supported.

6.4 Impact on Contracts and Schedules

At a minimum, the following schedules will be updated as a result of the changes introduced by this Modification:

- Schedule 6.1 - to reflect delivery milestones
- Schedule 7.1 - to reflect payment milestones under this Modification
- Schedule 11 - to reflect an uplift to the CH specifications
- Schedule 12 - to reflect the uplifted technical specification versions

Appendix A: Risks, Assumptions, Issues, and Dependencies

The tables below provide a summary of the Risks, Assumptions, Issues, and Dependencies (RAID) observed during the production of the Full Impact Assessment. 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.

Risks

Ref	Description	Status/Mitigation
CSC-R3	Risk that this Change Request is seen to be poor value for money given the expectation that all Test Comms Hub variants have been included in scope. The Test Comms Hub variants in operation today have significant overlapping scope and use cases. CSP South and Central recommend considering reducing the scope and complexity of this Modification by simplifying the Test Comms Hub product line.	Open, there are no plans to reduce Comms Hub product line
CSC-R8	As additional CRs are included in FMP scheduled releases, there may be a priority call on which defects can be fixed within the available slots in FMP. There is a risk that defect fixes may be delayed to accommodate CRs to be in scope for FMP release candidates. Prioritising and scheduling of CR and defects within the FMP will be agreed within the Firmware Management Forum.	Open, but management will also involve DCC In Life Change Delivery team

Assumptions

These assumptions have been used in the creation of this Full Impact Assessment. Any changes to the assumptions may require DCC to undertake further assessment, prior to the contracting and implementation of this change**.**

Ref	Description	Status/Mitigation
CSC-A3	Assume that when the associated GBCS/SMETS/CHTS specifications to support the changes for this Modification are defined, there will be no material changes from the documentation beyond those specified in this document.	Accepted, but noted that there are no changes in SMETS or CHTS, and that CSP South and Central will update CH02
CSC-A7	Assume that DCC-L have an agreed Change Request to implement CH firmware version to align to GBCS version 3.x prior to the approval of this Impact Assessment	Rejected, there is no requirement for this assumption.
CSC-A8	Assume that a single Impact Assessment will be created to support this Modification and all other changes for the proposed June 2022 release.	Accepted
CSC-A9	Assume that as per the current discussions in GBCS Working Group, the GPF should execute all commands upon receipt and ignore information relating to execution at a future date	Accepted
CSC-A10	Assume that there are no more than four firmware maintenance releases per annum.	Accepted
CSC-A11	Assumes the following:	Accepted, although DCC challenges the requirement for

	• No additional PIT CH or other test hardware/software needs to be procured to support this testing; • Test Approach is broadly in line with previous and current 'Production Support Testing PST' approach in SIT • This testing only on the SIT A environment • Requires 5 SIT test sets and will be executed over 4 weeks - this is based on an average calculation based against previous PST activity • Requires 2-week window for Device Set Up which gives reasonable contingency for onsite working restrictions which may be in place at the time of set up due to Covid-19 • Meters for SIT are provided by DCC to support this testing • No downtimes or maintenance activities takes place during this period in SIT A environment. Any planned outages are agreed with SI/DCC	this duration and quantity of SIT testing as well as 2 weeks to set up a test lab
CSC-A12	Assumes that the functional changes to CH firmware can be delivered with the application layer and do not require stack developments from the ZigBee chip provider, or the WAN modem providers. Should a new stack be needed, besides additional development time, experience has shown a lengthy CPA accreditation is also needed.	Accepted

Issues

None at this time.

Dependencies

Ref.	Dependency	Implication if dependency not met	Status
CSC-D1	Dependency on DCC to provide and confirm the GBCS/SMETS/CHTS specifications to support the changes in this Modification	Work cannot start and a further FIA may be required	Accepted but noted that there are no changes in SMETS or CHTS, and that CSP South and Central will update CH02
CSC-D2	Dependency on updating the Parse and Correlate application		Rejected; no changes in Parse and Correlate are required.

Appendix B: Glossary

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

Acronym	Definition
ACB	Access Control Broker
BEIS	Department for Business, Energy & Industrial Strategy
CH, Comms Hub	Communications Hub
CoT	Change of Tenancy
CHF	Communications Hub Function
CPA	Commercial Product Assurance
CR	(DCC) Change Request
CSP	Communication Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
ESI	Enterprise Systems Interface
ESME	Electricity Smart Metering Equipment
FIA	Full Impact Assessment
FMP	Firmware Management Policy
FOC	Final Operating Capability
GBCS	Great Britain Companion Specification
GFI	GBCS Integration Testing For Industry
GPF	Gas Proxy Function
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
IRP	Issue Resolution Proposal
PIA	Preliminary Impact Assessment
PIT	Pre-Integration Testing
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specification
SM WAN	Wide Area Network
SP	Service Provider
SRV	Service Request Variant
TSIRS	Technical Specification Issue Resolution Sub-Group
TTO	Transition to Operations
UIT	User Integration Testing

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MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 4'

Annex D

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP099 Refinement Consultation.

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

Question 1			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	No	While we agree with the contact of these IRPs and that they should be implemented, as agreed at TSIRS, we do not agree that new sub-versions of the Technical Specifications should be created. This is not the approach proposed for other changes (namely MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4). Creation of new sub-versions of GBCS would require all devices installed compliant with the previous sub-version to be upgraded, and any devices that could not be upgraded would no longer be compliant with supplier obligations to maintain devices to a valid version the Technical Specifications. This is mainly a concern for GBCSv3.3 as devices are already being developed to be compliant with version 3.2 and would therefore need to be upgraded as a result of this change. We believe that these changes could be included in GBCSv4.0; it is not clear why any new sub-versions would be required.

Question 2: Will there be any impact on your organisation to implement MP099?

Question 2			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	We will need to ensure devices that we procure and are responsible for are compliant with the new version of GBCS.

Question 3: Will your organisation incur any costs in implementing MP099?

Question 3			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	It I difficult to accurately identify the costs associated with any single change to the device specifications. The cost of this change will be higher if we are required to upgrade devices we have already installed to be compliant with the new version of GBCS.

Question 4: Do you believe that MP099 would better facilitate the General SEC Objectives?

Question 4			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	We agree that implementing this change will better facilitate SEC Objective (a), as these IRPs resolve issues with the Technical Specifications and will ensure devices operate correctly.

Question 5: Noting the costs and benefits of this modification, do you believe MP099 should be approved?

Question 5			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	We agree that these changes should be made, as noted above the question is how they should be implemented in a new version of GBCS.

Question 6: Do you agree with the proposed implementation approach?

Question 6			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	No	See answer to question 1.

Question 7: Do you agree that the legal text will deliver MP099?

Question 7			
Respondent	**Category**	**Response**	**Rationale**
EDF	Large Supplier	Yes	We have not identified any issues with the legal text

Question 8: Please provide any further comments you may have

Question 8		
Respondent	**Category**	**Response and Rationale**
EDF	Large Supplier	We are concerned that there is a lack of clarity in regards to the overall strategy for implementing device related changes and how changes should be included in new versions of the Technical Specifications. This is one of a number of changes in progress which require changes to be made to the Technical Specifications, while these changes are separate the way that they are implemented needs to be more coordinated, and the impact on parties resulting from creating new sub-versions of devices (which impacts devices that are installed and in the supply chain) needs to be considered.

SEC
Smart Energy Code

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Smart Energy Code

MP144

‘Charging of Random Sample Privacy Assessments’

Modification Report

Version 0.5

9 April 2021

Corporate member of Plain English Campaign
Committed to clearer communication
592

About this document

This document is a draft Modification Report. It currently 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 full responses received to the Refinement Consultation.

Contact

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

Harry Jones

020 7081 3345

harry.jones@gemserv.com

1. Summary

This proposal has been raised by Terry Jefferson on behalf of the SEC Panel.

The methodology for carrying out Random Sample Privacy Assessments (RSPAs) has evolved since originally being written into the SEC. The SEC currently states that all RSPA costs will be socialised. This means all Users are being charged for the cost of these assessments which are undertaken only by Other Users.

The Proposed Solution is to amend the entries in the SEC that set out RSPAs as “Recoverable Costs” and align it to the payment methods used for other privacy assessments. The Alternative Solution is to keep RSPAs requested by Panel outside of annual assessment cycles as “Recoverable Costs”, with RSPAs triggered through Service Request activity being paid for by the individual User.

The Modification Proposal affects all Supplier Parties, Network Parties and Other SEC Parties as it affects a cost that the industry as a whole is charged with. The change has no Data Communications Company (DCC) costs to implement and has no lead time. This modification, if approved under Self-Governance, is targeted for implementation in the June 2021 SEC Release.

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. An RSPA 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 privacy obligations set out in SEC Section I ‘Data Privacy’.

All Other Users are required to undergo a RSPA as part of the three-year privacy assessment cycle This begins once an Other User has passed a threshold of sending the prerequisite Service Requests, as predetermined by the SEC Panel (currently set at 1,000 in a two year period). The SEC Panel can also request that an Other User undergoes an RSPA at any time it feels is necessary. This would be an additional assessment to those taken as part of the three-year privacy assessment cycle.

Any costs which are incurred in the completion of RSPAs are then socialised across all Users. This is the only type of assessment that is charged through Recoverable Costs, as all other privacy and security assessments are charged directly to the Other User.

What is the issue?

The SEC currently states that all RSPAs 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 RSPAs. 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 RSPA that is currently undertaken is confirmed as a Recoverable Cost. Because these costs for the RSPAs are treated as Recoverable Costs, it results in the industry as a whole paying for assessments which only Other Users undertake. RSPAs are now being triggered when the Other User exceeds a User Privacy Assessment threshold of Service Request activity. At this point the Assessment becomes standard through the annual assessment process, and will be repeated once in each three-year assessment cycle. As of September 2020, there has only been one completed RSPA and another one which is currently in progress. The projected total cost of the RSPAs in the financial years 2020/21 and 2021/22 will range between £25,000 and £53,000 each year.

What is the impact this is having?

The SEC Panel has now established when an Other User is required to undergo a RSPA. The first Other Users have begun to undergo RSPAs as a part of their regular three-year assessment cycle. In these instances, it would be more appropriate for the cost of a RSPA to be apportioned to the Other Users directly, as with the other types of User Privacy Assessment. The only exception to this could be if the assessment is conducted at the request of the SEC Panel, in which case it may be these costs should still 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 increasing important that the costs are allocated fairly.

Impact on consumers

There is no impact to consumers because of this issue.

3. Solution

Proposed Solution

The Proposed Solution is to amend the clauses in SEC Section I to remove any financial references to RSPAs being treated as "Recoverable Costs". This will bring RSPAs in line with the other privacy assessment types so that they are all paid by the individual User, rather than as a socialised cost across industry.

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

All Supplier Parties, Network Operators and Other SEC Party types are affected by this Modification Proposal. Currently, all of these SEC Party categories pay for the undertaking of each RSPA as the cost of this assessment is a Recoverable Cost. Under the Proposed Solution, only the individual User will pay for the RSPA rather than all industry members.

DCC System

There is no impact to the DCC System as a result of this Modification Proposal.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section I 'Data Privacy'

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

Consumers

There are no impacts anticipated on consumers. There may be a minor cost saving where industry members who pay for a RSPA would not pass through any incurred costs to consumers, but this likely to be a very low amount.

Other industry Codes

There are no impacts to other industry codes caused by this Modification Proposal.

Greenhouse gas emissions

There is no impact to greenhouse gas emissions caused by this Modification Proposal.

5. Costs

DCC costs

There are no DCC costs to implement this Modification Proposal.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (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.

SEC Party costs

There are no SEC Party costs associated with this Modification Proposal. One Other SEC Party responded in the Refinement Consultation that it would incur costs related to time to automate scripts to provide responses and then management time. All the other respondents in the Refinement Consultation stated that they would not incur any 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 on or before 10 June 2021; or
- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received after 10 June 2021 but on or before 21 October 2021.

Due to this change having no DCC Systems impacts and therefore minimal lead time needed after approval, the Modification Proposal should be placed into the next available SEC Release. If the Modification Proposal is not approved in time for the June 2021 SEC Release, it could be incorporated as part of the November 2021 SEC Release.

7. 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 RSPA charging methodology. One member suggested that it would be worth checking the numbers of RSPAs 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. SECAS subsequently confirmed that, as of November 2020, one RSPA has been completed, with one other ongoing. The projected cost of the RSPAs 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 Assessment become necessary the description of 'Random' probably wasn't accurate and perhaps that should be considered during the Refinement Process. SECAS investigated this during the Refinement period, and it was confirmed that the "Random Sample" part of the RSPA is due to the methodology used. In particular, it's where the User IPA performs the assessment using a random sampling of the Service Requests provided by the assessed User to ensure the data gained from those Service Requests has been processed using the User's privacy processes.

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, but only so that it remained updated on its progress, and acknowledged this does not materially impact security or SSC business. One member raised the point that there has only been a single completed RSPA so far, in part due to how recently the assessment type was introduced into the SEC.
- 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.

Solution development

Discussions over whether RSPA costs should be socialised

The Proposer and the Working Group agreed that the existing model of all RSPA costs required changing, but this led to discussions about whether the Proposed Solution should socialise costs in certain instances. The scenario that came up was whether the RSPAs that were not triggered by Service Request thresholds being surpassed, and instead requested at the Panel's discretion, should be paid for by the individual User or socialised across industry. The point was considered that where a User was not intending to take an RSPA and would then be requested to pay for said assessment, this could be considered harsh for the randomly chosen User. The Proposer decided to explore an

alternative option to cover this variant of the solution, which could be presented to the industry in the Refinement Consultation to gauge which variation industry preferred (see below).

One Working Group member enquired into why the change was needed as RSPAs previously were carried out annually for an Other User at random, and the shared cost made this a fairer process than billing only the randomly selected User. SECAS explained that the move to having Service Requests activity triggering a RSPA means multiple Users will be tested in a year. Following this, Working Group members were happy for the Modification Proposal to be taken for a Refinement Consultation after agreeing with the issue, Proposed Solution and proposed legal text.

Potential Alternative Solution

An alternative option was considered by the Proposer to amend the clauses in SEC Section I so that RSPAs will only be treated as "Recoverable Costs" when required at Panel's request. This will mean all RSPAs triggered through Service Request activity will be paid for by the individual User, but ones that Users take outside of an annual assessment cycle will continue to have their costs socialised across industry. This would bring the RSPAs undertaken through Service Request related activity in line with the other User Privacy Assessment which all require the individual Users to pay for these assessments.

This option was raised in the Refinement Consultation alongside the Proposed Solution. The full set of responses received can be found in Annex B. Respondents were asked which version of the solution should be implemented if approved. The three respondents who agreed with the change preferred the Proposed Solution. No responses returned favoured the alternative option. Noting these views, the Proposer confirmed that they would continue with the original Proposed Solution, and the alternative option was not taken any further.

Support for Change

Working Group

When the Modification Proposal was taken to the February 2021 Working Group, there was support for both the Proposed Solution and the draft legal text found in Annex A. No other comments were made at the meeting other than a query regarding why the charging methodology required changing. SECAS noted this was needed for consistency, which other Working Group members agreed with.

Refinement Consultation

The Refinement Consultation had four responses in total, three supporting the Modification Proposal and one opposing it.

Of the three SEC Parties in favour, there were two Network Operators and one Small Supplier, all of who believed the Proposed Solution would be best to fix the issue raised. They all raised no concerns with the implementation approach or costs incurred if the Modification Proposal were approved and believed there would be no impacts to their consumers.

The one respondent who opposed the Modification Proposal was an Other SEC Party, who believed neither solution would be beneficial if implemented. They cited that Other Users bring value to the industry as a whole, and that by removing the socialisation of costs on the RSPA, it would potentially provide additional expense on top of what is already an expensive role to maintain. Additionally, they

believed that this would disincentivise the uptake in becoming an Other User if the User would potentially have to front the entire cost of an RSPA which could decrease innovation.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that General SEC objective (g)[1] is bettered by the Modification Proposal by aligning the RSPA to the other User Privacy Assessment types and making the assessment cost methodology more consistent with the others.

Industry views

The Working Group did not comment on the General SEC Objectives.

The Refinement Consultation respondents who agreed with the solution cited General SEC Objective (g) as being improved. These ranged on the grounds of making the administration and implementation of the SEC more transparent to ensuring consistency for the costing methodology among all of the User Privacy Assessments.

Views against the consumer areas

This Modification Proposal will have a neutral impact on consumers. This is due to the cost of the RSPA remaining identical, even though the methodology is being altered. This will likely not affect how much an average consumer would pay on their bills, their environmental impact such as a carbon footprint or their experience of the Smart Meter Implementation Programme (SMIP). The Modification Proposal is instead desirable due to improving the charging methodology by making the RSPA consistent with other User Privacy Assessment types, rather than a consumer benefit that could be derived from the proposal.

Improved safety and reliability

The Modification Proposal is neutral against this consumer benefit area. This is due to not affecting any element of safety or reliability within the SMIP.

Lower bills than would otherwise be the case

The Modification Proposal is neutral against this consumer benefit area. This is due to not affecting the cost of an RSPA, therefore not increasing or decreasing the amount passed through to consumers.

Reduced environmental damage

The Modification Proposal is neutral against this consumer benefit area. This is due to having no material impact on greenhouse gases or improving/reducing energy efficiency.

[1] Facilitate the efficient and transparent administration and implementation of the SEC.

Improved quality of service

The Modification Proposal is neutral against this consumer benefit area. This is due to the RSPA only being experienced by the User, not a consumer. Consequently, this leads to no difference in the quality of service provided to a consumer.

Benefits for society as a whole

The Modification Proposal is neutral against this consumer benefit area. There is no wider benefit to society, instead the benefit will be felt by Users who will only have to deal with one uniform method of costings involved with a User Privacy Assessment. It is worth noting that potential Other Users may be discouraged from joining the SEC if they see the RSPA cost that they solely would pay as a barrier to entry if they can't factor that finance in. This could possibly lead to a reduction in Other User Services available to the wider public, and could reduce innovation. Given the overall cost of operating measured against the cost of an RSPA, it will not be significant enough to deter these Other Users joining, but could nonetheless act as a disincentive.

Appendix 1: Progression timetable

The Modification Report will be brought to the Panel on 16 April 2021 for decision. If approved, it will proceed to Modification Report Consultation and be taken to the Change Board in May 2021 for vote under Self-Governance.

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	3 Mar 2021 – 23 Mar 2021
Modification Report approved by Panel	16 Apr 2021
Modification Report Consultation	19 Apr 2021 – 10 May 2021
Change Board vote	26 May 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
EUA	Energy and Utilities Alliance
IPA	Independent Privacy Auditor
RSPA	Random Sample Privacy Assessment
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMIP	Smart Metering Implementation Programme
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub Committee
TABASC	Technical Architecture and Business Architecture Sub Committee

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MP144 'Charging of Random Sample Privacy Assessment'

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.

This document contains the changes required to deliver the Proposed Solution.

Section I 'Data Privacy'

These changes have been redlined against Section I version 9.0.

Amend Section I2.40 as follows:

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;

(b) the production by the Independent Privacy Auditor of any Privacy Assessment Reports following such assessments; and

(c) all related activities of the Independent Privacy Auditor in respect of that Other User in accordance with this Section I2.

Amend Section I2.41 as follows:

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).

Amend Section I2.42 as follows:

I2.42 For the purposes of Section I2.40 the Panel shall, at such times and in respect of such periods as it may (following consultation with the DCC) consider appropriate, notify the DCC of:

(a) all the expenditure incurred in respect of the matters described in Section I2.40 that is attributable to individual Other Users, in order to facilitate Explicit Charges designed to pass-through the expenditure so such Other Users pursuant to Section K7 (Determining Explicit Charges); and

(b) any expenditure incurred in the respect of:

~~(i)~~ the matters described in Section I2.40 which cannot reasonably be attributed to an individual Other User~~; and~~

~~(ii) Random Sample Privacy Assessments~~.

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MP144 'Charging of Random Sample Privacy Assessments'

Annex B

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP144 Refinement Consultation.

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

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes and No	We believe that the modification identifies the issue as RSPA costs being socialised. If this is the issue then we believe that the proposed solution directly addresses this issue and the alternative solution only partially address this issue.	
Electricity North West Limited	Network Party	Yes	The proposed solution will bring RSPAs in line with the other privacy assessment types so that they are all paid by the individual User, rather than as a socialised cost across industry.	
Haven Power	Small Supplier	Yes	When the current arrangements were written into the SEC, the costs socialised for Random Sample Privacy Assessments (RSPAs) were minimal. However, as the rollout has accelerated, the number of RSPAs undertaken by Other Users has increased and will continue to do so. It's right that these costs are allocated fairly and RSPAs are brought into line with other privacy assessments which are paid for by the User undertaking the assessment.	
Hildebrand Technology Ltd	Other SEC Party	No	The Other User role has yet to be proven as commercially viable but brings value to industry as a whole by facilitating access to consumption data for research projects and other explorations into the value of smart	

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			meter data on behalf of consumers for organisations like BEIS, Gemserv, etc. who are studying this area. It also offers suppliers support with transparency on issues like tariffs loaded on meters (not all have this service via their adaptor). The role is already expensive to maintain in light of SECAS' annual Audit fees for both Security and Privacy in addition to DCC connectivity costs; this will be further cost to absorb with no benefit to the Other User. We recommend that the cost of the Random Audit continues to be distributed across industry for one or two more years until the Other User role is better proven.	

Question 2: Will there be any impact on your organisation to implement MP144?

Question 2				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	No		
Electricity North West Limited	Network Party	No		
Haven Power	Small Supplier	No	Other than a beneficial reduction in SEC charges, we do not expect the implementation of MP144 to impact our organisation.	
Hildebrand Technology Ltd	Other SEC Party	Yes	The cost is not quantified in the proposal other than total costs to industry across an unknown number of RSPA; we have no guidance on whether costs will be higher than the Privacy Assessment and we therefore assume costs will be higher. We appreciate that costs will be affected by level of preparedness – but previous experience with Security Audits demonstrates that even being commended for excellent preparation does not translate to fees being on the lower side of the spectrum.	

Question 3: Will your organisation incur any costs in implementing MP144?

Question 3				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	No	We will benefit by either not having or paying reduced RSPA costs.	
Electricity North West Limited	Network Party	No		
Haven Power	Small Supplier	No		
Hildebrand Technology Ltd	Other SEC Party	Yes	Costs will be internal – time to automate scripts to provide responses and then management time. No cost savings are expected.	

Question 4: Do you believe that MP144 would better facilitate the General SEC Objectives?

Question 4				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes	We agree that this modification will better facilitate SEC Objective (g) by aligning RSPA cost methodology with other User Privacy Assessment time and ensuring a consistency.	
Electricity North West Limited	Network Party	Yes	Yes we agree with the proposer that the General SEC objective (g) is bettered facilitated by the Modification Proposal by aligning the RSPA to the other User Privacy Assessment types and making the assessment cost methodology more consistent with the others.	
Haven Power	Small Supplier	Yes	We agree with the Proposer's view that MP144 would better facilitate General SEC Objective (g) – To facilitate the efficient and transparent administration and implementation of the SEC.	
Hildebrand Technology Ltd	Other SEC Party	No	Doesn't encourage organisations to become an Other User which is a role designed to support innovation around smart meter data and give consumers choice in connecting a range of third party devices to their meters – which also requires OU SRs.	

Question 5: Noting the costs and benefits of this modification, do you believe MP144 should be approved?

Question 5				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes		
Electricity North West Limited	Network Party	Yes		
Haven Power	Small Supplier	Yes	Whilst the current arrangements appear to have a relatively small impact on SEC party charges, if allowed to continue, parties will incur greater costs as the number of RSPAs increase. The estimated one-off cost to implement MP144 is justified on the basis that it addresses this distortion.	
Hildebrand Technology Ltd	Other SEC Party	No	See above.	

Question 6: How long from the point of approval would your organisation need to implement MP144?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	N/A		
Electricity North West Limited	Network Party	N/A		
Haven Power	Small Supplier	Drax requires no lead time after approval.	We will not incur any system or process changes as a result of this change.	
Hildebrand Technology Ltd	Other SEC Party	By the next audit that required RSPA which is unknown.		

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

Question 7				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes	We agree that this modification should be implemented in the next SEC Release after the approval.	
Electricity North West Limited	Network Party	Yes		
Haven Power	Small Supplier	Yes	We support the earlier implementation date of 24th June 2021 but accept implementation may have to be delayed until November if a decision to approve is received after 10th June.	
Hildebrand Technology Ltd	Other SEC Party	No	See above.	

Question 8: If MP144 is approved, which solution do you believe should be implemented?

Question 6				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Proposed Solution	The modification states that the issue is RSPA costs are being socialised amongst industry. The proposed solution is the only solution that completely addresses this issue.	
Electricity North West Limited	Network Party	Proposed Solution	This will bring RSPAs in line with the other privacy assessment types so that they are all paid by the individual User, rather than as a socialised cost across industry.	
Haven Power	Small Supplier	Proposed Solution	In our view the Proposed Solution is the fairest and most straightforward approach, bringing RSPAs in line with other privacy assessment types which are paid for by the individual user.	
Hildebrand Technology Ltd	Other SEC Party			

Question 9: Do you agree that the legal text will deliver MP144?

Question 9				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Yes	We agree that the legal text for both solutions delivers the intent of that solution.	
Electricity North West Limited	Network Party			
Haven Power	Small Supplier	Yes	We have no comment on the legal text.	
Hildebrand Technology Ltd	Other SEC Party	No comment on legal text		

Question 10: Do you believe there will be any impacts on or benefits to consumers if MP144 is implemented?

Question 10				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	No		
Electricity North West Limited	Network Party			
Haven Power	Small Supplier	No		
Hildebrand Technology Ltd	Other SEC Party	Yes	There is risk that adding further costs, that are out of the OU's control in many respects, makes a role which is already unproven commercially even less attractive.	

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	**Category**	**Comments**	**SECAS Response**
Western Power Distribution	Network Party		
Electricity North West Limited	Network Party		
Haven Power	Small Supplier	No further comments	
Hildebrand Technology Ltd	Other SEC Party		

SEC
Smart Energy Code

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Smart Energy Code

DP153

‘Follow up changes for Communications Hub Finance Charges’

Modification Report

Version 0.3

9 April 2021

Corporate member of Plain English Campaign
Committed to clearer communication
592

About this document

This document is a Modification Report. It currently 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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4. Impacts 4
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This document also one annex:

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

Contact

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

Joe Hehir

020 7770 6874

joe.hehir@gemserv.com

1. Summary

This proposal has been raised by Nick Kelly from the Data Communications Company (DCC)

MP118 'Communications Hub Finance Charges' was implemented as part of the November 2020 SEC Release. MP118 aimed to change the arrangement which required the DCC to issue four invoices a month for Communications Hub Finance Charges (two invoices for each Communication Services Provider (CSP), North and Central & South), each of which would be payable to a different Party.

Changes to SEC Section J1.2(b) were initially drafted as part of the MP118 legal text. However, these changes were subsequently omitted due to human error. The Proposer believes that MP118 will not achieve its full efficiency without the omitted legal drafting being implemented.

The Proposed Solution is to amend Section J1.2(b) so that the DCC only has to provide a separate invoice for Communications Hub Finance Charges if that is what has been agreed with the Approved Finance Party.

All SEC Parties will be affected by the change in how invoices are issued, although this will make the invoicing process more efficient. The costs of this proposal are limited to Smart Energy Code Administrator and Secretariat (SECAS) time and effort to update the SEC. If approved, this modification is targeted for the June 2021 SEC Release.

2. Issue

What are the current arrangements?

MP118 'Communications Hub Finance Charges' was implemented as part of the November 2020 SEC Release. This modification aimed to amend the invoicing arrangements as the DCC commenced the next phase of Communications Hub financing. At this stage, the number of financing payments will increase, and the previous dual-invoicing arrangement would become untenable due to the time taken to produce invoices. The DCC considered the existing process would not have been cost effective for itself, Suppliers or other SEC Parties.

What is the issue?

The initial scope of MP118 proposed to change SEC Sections J1.2(a), J1.2(b) and J1.7 so that the DCC is no longer obliged to bill Communications Hub Finance Charges under separate invoices. The solution proposed that all invoiced items will be included on one invoice and paid to one bank account. This will be more efficient for the Approved Finance Party (AFP) and the DCC to invoice and easier for SEC Parties to pay.

The changes required to Section J1.2(b) to facilitate the Proposed Solution was erroneously omitted from the legal drafting of MP118 during the Refinement Process due to human error.

What is the impact this is having?

The Proposer believes the impact of not making this change is that the full efficiency of MP118 will not be realised.

Section J1.2(b) details SEC Parties' terms of agreement with an Approved Finance Party, which is specifically what sets out the specific invoicing arrangements that the DCC requires. The omitted changes to Section J1.2(b) would specifically seek to remove the arrangement of separate invoicing for separate charges, which addresses the original issue in MP118. This is aimed at making the invoicing process less cumbersome for the DCC and more efficient for the DCC and SEC Parties. As part of MP118, Section J1.2(a) only refers to the arrangements around Section J1.2(b), which means MP118's approved legal text will not deliver the full solution intended by the Proposer.

Impact on consumers

This issue has no impact on consumers.

3. Solution

Proposed Solution

The Proposed Solution is to amend Section J1.2(b) so that the DCC only has to provide a separate invoice for Communications Hub Finance Charges if that is what is required under the direct agreement with the Approved Finance Party.

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

All SEC Parties will be affected by the change in how invoices are issued, although this will make the invoicing process more efficient.

DCC System

This modification will not impact the DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- SEC Section J 'Charges'

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

Consumers

This modification will not impact consumers.

Other industry Codes

This modification will not impact any other industry Codes.

Greenhouse gas emissions

This modification will not impact greenhouse gas emissions.

5. Costs

DCC costs

This modification will not incur any DCC costs.

SECAS costs

The estimated SECAS implementation costs to implement this modification is half a day of effort, amounting to approximately £300. The activities needed to be undertaken for this are:

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

SEC Party costs

This modification will not incur any 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 on or before 10 June 2021; or
- **Ten Working Days after decision** (ad-hoc SEC Release) if a decision is received after 10 June 2021.

This modification needs to be implemented as soon as reasonably practicable to realise the benefits of MP118. The June 2021 SEC Release is the next scheduled release this modification could be targeted for.

7. Assessment of the proposal

Observations on the issue

Change Sub-Committee views

The Change Sub-Committee (CSC) agreed the issue was clear and should be progressed as quickly as possible. It believed this modification should be progressed as a Fast-Track Modification (see SEC Section D2.8 'Fast-Track Modifications') as it is seeking to correct an inconsistency in the Code, namely, to reflect the intended Proposed Solution of a previously approved Modification Proposal (MP118). SECAS agreed it would recommend to the Panel that this be progressed as a Fast-Tack Modification, or if the Panel disagreed, then to progress it directly to the Report Phase. Either option would provide enough time to meet the targeted implementation date of the June 2021 SEC Release.

Solution development

Section J1.2(b) amendments

The draft legal text for Section J1.2(b) was previously seen by the Working Group during the refinement of MP118, who raised no comments at the time. This modification seeks to implement those changes as part of the legal text was erroneously excluded from MP118 due to human error.

Views against the General SEC Objectives

Proposer's views

Objective (g)[1]

The Proposer believes this modification will better facilitate SEC Objective (g) as it will reduce the amount of time spent producing invoices as well as reconciling incorrect payments.

[1] Facilitate the efficient and transparent administration and implementation of the SEC.

Views against the consumer areas

Improved safety and reliability

If implemented, this modification will have a neutral impact against this consumer area.

Lower bills than would otherwise be the case

If implemented, this modification will have a neutral impact against this consumer area.

Reduced environmental damage

If implemented, this modification will have a neutral impact against this consumer area.

Improved quality of service

If implemented, this modification will have a neutral impact against this consumer area.

Benefits for society as a whole

If implemented, this modification will have a neutral impact against this consumer area.

Appendix 1: Progression timetable

Since this Draft Proposal only covers consequential changes designed to ensure the delivery of earlier approved Modification Proposals, SECAS believe these are grounds for this proposal to be progressed as a Fast-Track Modification.

This Draft Proposal was presented to the CSC on 30 March 2021 where it was agreed to recommend to the Panel to progress this as a Fast-Track Modification. It will be presented to the Panel on 16 April 2021.

Timetable	
Event/Action	**Date**
Draft Proposal raised	16 Feb 2021
Presented to CSC for initial comment	23 Feb 2021
Presented to CSC for final comment and recommendations	30 Mar 2021
Panel converts Draft Proposal to Modification Proposal	16 Apr 2021
Panel approve under Fast-Track Modification	16 Apr 2021
Fast-Track decision objection period	16 Apr – 7 May 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**
AFP	Approved Finance Party
CSC	Change Sub-Committee
CSP	Communication Services Provider
DCC	Data Communications Company
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat

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MP153 'Communications Hub Finance Charges'

Annex A

Legal text – version 0.1

About this document

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

Section J 'Charges'

These changes have been redlined against Section J version 8.0.

Amend Section J as follows:

J1. PAYMENT OF CHARGES

Charges

J1.1 Each Party shall pay the Charges to the DCC, which Charges shall be determined in accordance with the Charging Statement applicable from time to time.

Invoicing of Charges

J1.2 Following the end of each month in which one or more Parties incurs Charges in accordance with the Charging Statement, the DCC shall prepare and submit to each such Party one or more invoices or one or more invoices with a separate accompanying statement (in either case, an "**Invoice**") showing:

(a) in respect of all Charges other than those referred to in Section J1.2(b):

(i) the date by which payment is due pursuant to Section J1.5;

(ii) a breakdown (in reasonable detail) of the Charges incurred by that Party in that month;

(iii) subject to Section J1.4, the amount of VAT payable on the above amounts;

(iv) any adjustment required pursuant to Section J1.9; and

(v) the total amount payable by that Party in respect of the above; and

(b) in respect of any Communications Hub Finance Charges ~~(such that there is a separate Invoice for the charges relating to each Approved Finance Party)~~ which are required to be invoiced separately under the terms of a Direct Agreement with an Approved Finance Party:

(i) the date by which payment is due pursuant to Section J1.5;

(ii) a breakdown (in reasonable detail) of the Charges incurred by that Party in that month;

(iii) subject to Section J1.4, the amount of VAT payable on the above amounts;

(iv) any adjustment required pursuant to Section J1.9; and;

(v) the total amount payable by that Party in respect of the above.

J1.3 The DCC is not obliged to issue an Invoice to a Party in respect of a month under Section J1.2 where the aggregate Charges incurred by that Party in respect of that month are less than the Minimum Monthly Charge (inclusive of VAT). Where the DCC opts not to issue an Invoice to Party in respect of a month in reliance on this Section J1.3, the DCC shall carry forward the Charges incurred in respect of that month and aggregate them with the Charges incurred by that

Party in respect of the following month for the purposes of Section J1.2. Notwithstanding the other provisions of this Section J1.3, the DCC must, in respect of each Party that has incurred Charges in respect of a Regulatory Year, issue at least one Invoice to that Party in respect of that Regulatory Year.

J1.4 The Charges stated in each Invoice shall be stated exclusive of VAT, which shall be added if appropriate at the rate prevailing at the relevant tax point. A Party shall only be required to pay VAT where the DCC provides an appropriate VAT invoice.

Payment of Charges

J1.5 Each Party shall pay the amount set out in an Invoice issued to it by the DCC by the "**Due Date**" for payment; being the later of:

(a) 5 Working Days following receipt of such invoice; and

(b) 8 Working Days following the end of the month to which such invoice relates.

J1.6 Without prejudice to a Party's right to dispute the Charges in accordance with Section J2 (Payment Default and Disputes), each Party shall pay the amount set out in each Invoice addressed to it by the Due Date for such payment regardless of any such dispute. Nevertheless, where the DCC agrees that an Invoice contains a manifest error, the DCC shall cancel that Invoice (which will not therefore be payable) and promptly issue a replacement Invoice.

J1.7 Payments shall be made in pounds sterling by transfer of funds to the credit of the account specified in the Invoice, and shall not be deemed to be made until the amount is available as cleared funds. Each payment shall identify within its reference the Invoice number to which that payment relates. The paying Party shall be responsible for all banking fees associated with the transfer of funds. The DCC may at its discretion specify a different account for amounts payable by way of the Communications Hub Finance Charges relating to each Approved Finance Party (separately from amounts payable in relation to each other Approved Finance Party and/or all other Charges). The accounts specified by the DCC for the purposes of amounts payable by way the Communications Hub Finance Charges may be accounts held in the name of the relevant Approved Finance Party.