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Paper Reference:	**SECP_91_1604_06**
Action:	**For Decision**

Market-Wide Half-Hourly Settlements: Update on Data Privacy

1. Purpose

At SEC Panel Meeting 89, SECAS presented the SEC Panel with three possible approaches to Data Privacy for Parties operating using the Meter Data Retrieval (MDR) User Role once Market-wide Half Hourly Settlement (MHHS) has been introduced. The Panel asked SECAS to investigate two of these options in greater detail and this paper provides an update on the progress made so far. The Panel is asked to note the update and agree that actions 89/01 and 89/02 should be closed; and that subsequent work on data privacy under MHHS should be subsumed into the forthcoming Modification Proposal.

2. Background

In SEC Panel Meeting 89, SECAS presented the Panel with three high-level options that could apply to Parties operating using only the MDR User Role to ensure that data privacy within the Smart metering ecosystem is maintained at current levels after MHHS has been implemented. These options were:

1. **Rely on existing data privacy legislation:** MDRs would be only required to comply with existing General Data Protection Regulations (GDPR) and Data Protection Act (DPA) legislation, with licenced Parties continuing to comply with all existing obligations.
2. **SEC Privacy Assessments:** MDRs would be subject to a Full Privacy Assessment when completing the User Entry Process for the MDR User Role and periodic Privacy Self-Assessments, with licensed Parties being exempt from this requirement.
3. **Checks within DCC Systems:** The DCC would check the identity of the MDR and the granularity for which it has gained consumer consent for each transaction when Half Hourly (HH) data is requested from a Meter.

The Panel did not indicate any support for option 1 (Rely on existing data privacy legislation), and placed action SECP89/01 on SECAS to develop each of the remaining options in more detail:

SECP89/01: *SECAS to investigate MWHHS Data Privacy Options 2 & 3, including requesting that DCC carries out a Preliminary Assessment on Option 3, and seek the views of potential MDR providers in relation to Option 2.*

This paper updates the Panel with the progress made on each aspect of this action. The work undertaken so far also completes the following action:

SECP89/02: *A Panel member (AP) to relay the Panel's discussion on MWHHS Data Privacy options back to MDRs to seek their feedback, which SECAS will then incorporate into its testing.*

3. Action Updates

Following discussions between the DCC, SECAS, and Ofgem, it has been agreed that the SEC Section D Modification Process should be formally triggered to provide robust and clear governance of the changes to the SEC needed to support the implementation of MHHS.

The Authority is shortly expected to direct the DCC to raise a single Modification Proposal to act as a vehicle for making all the required changes. We believe that the work to develop a privacy framework for Users operating using the MDR User Role only should be subsumed into this work. This will allow all parts of the full SEC solution for MHHS to be developed, assessed, and determined on holistically.

DCC Preliminary Assessment of Option 3

When the DCC raises this Modification Proposal, an assessment of the changes needed to support transaction-level checking of requests for HH data will be included in the requirements for the Preliminary Assessment. This will allow the costs and benefits to be assessed by the TABASC, OPSG, SSC and the Working Group alongside all other options.

Views from potential MDR parties on option 2

SECAS has had conversations with six organisations which have expressed interest in operating in the MDR User Role. All those organisations unanimously agreed that, given that the MDR is a Balancing and Settlement Code (BSC) construct, the Data Privacy requirements should be addressed by the BSC and not duplicated in the SEC. They also highlighted the following two points:

1. The Smart Data Service (SDS), which comprises the MDR and the Processing Service Smart (PSS) roles, will be a qualified BSC Party role and will be subject to the BSC's Performance Assurance Framework (PAF). The SDS will be responsible for ensuring that the MDR retrieves data at a granularity that has been consented to by the consumer of a particular premises[1]
2. Elexon would also be able to detect[2] if HH data were submitted at a higher granularity than consented to by the consumer. This would enable a variety of ex-post assurance techniques, such as regular monitoring of compliance and the targeted auditing of parties that are underperforming.

Annex A provides the Service Requirements for the MDR and PSS and in the Development Principles for Smart Data Services Qualification that were agreed between Elexon's Cross-Code Development group (CCDG) and Ofgem.

[1] The SDS will have access to Registration Data to check for granularity that has been consented to

[2] Elexon will have access to MPAN-level disaggregated HH data as well as the Registration Data

The qualification process and PAF for MHHS is yet to be defined in sufficient detail to support an assessment, and it is possible that the final design will not meet the requirements of Smart Metering and the Panel. We will monitor and assess this as part of the modification as these processes are developed.

4. Recommendations & Next Steps

The Panel is requested to:

- **NOTE** the contents of this paper; and
- **AGREE** that actions 89/01 and 89/02 should be closed; and that subsequent work on data privacy under MHHS should be subsumed into the forthcoming Modification Proposal.

Abhay Soorya

SECAS Team

9 April 2021

ANNEX A

The table below provides the Service Requirements for the MDR and the PSS drafted by the Design Working Group (DWG).

Ref #	Requirement Title	Requirement Description	Applicable To	MoSCoW Rating	Notes
PSS6.2	The PSS activity for opted-out customers	The PSS must not schedule Service Requests for SP level data where the PSS is aware that the Consumer/ Prosumer has 'opted-out' of access to SP level data for Settlement Purposes	Processing Service (Smart)	Could have	Data Access Policy dependent requirement
PSS6.3	PSS checks daily for changes in data access status or other changes impacting MDR schedules	The PSS must operate a daily process to check whether any flags have changed, and whether there have been any other changes (e.g. De-Energisations) affecting the retrieval schedule	Processing Service (Smart)	Could have	Data Access Policy dependent requirement
MDR4.1	Meter Data Retrieval (MDR) Service actions request for data from the requested smart Metering System	The MDR must action the request to obtain data from each Smart Metering in the frequency defined by the Processing Service	Meter Data Retrieval	Must have	The Processing Service is assumed to know what is required (SP-level data or RR) and when. This service will apply for on-demand and scheduled readings - and for the request of missing readings. This will be informed by the 'Smart Meter Data for Settlements' consents frequency confirmed by the Supplier; as proposed in the consultation this might be mandated HH for Micro Business and agreed frequency by the customer