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MP141 'SRV Visibility for Devices on SSI'

Modification Report

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Corporate member of
Plain English Campaign
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About this document

This document is a draft Modification Report. It currently sets out background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

Contents

1. Summary.....	3
2. Issue.....	3
3. Solution	4
4. Impacts	5
5. Costs	6
6. Implementation approach	6
7. Assessment of the proposal	7
Appendix 1: Progression timetable	9
Appendix 2: Glossary	10

This document also has three annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the full Data Communications Company (DCC) Preliminary Assessment response.
- **Annex C** contains the full responses received to the Refinement Consultation.

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1. Summary

This proposal has been raised by Clive Hallam from the DCC.

Supplier Parties are currently unable to view Service Request Variants (SRVs) or Service Responses from other Service Users that they receive relating to Devices they own. This is due to an obligation in the Smart Energy Code (SEC) that states only an individual User can view the SRVs and Service Responses they send or receive. This therefore leads to SRVs and Service Responses being received by Users without visibility or information of the triggering requests, which is causing issues where the responses may be high priority or have security implications.

The Proposed Solution is to allow Supplier Parties and Network Operators to view all the titles of SRVs and Service Responses that have been associated with a Device that they own. This will allow the User to action the affected SRVs or Service Responses and aid them in investigating the erratic behaviour of the affected Devices.

The Modification Proposal impacts Large Suppliers, Small Suppliers, Network Parties and the DCC. The Proposed Solution costs up to £300,000 up to and including Pre-integration Testing (PIT), has a lead time of three months up to and including PIT and is targeted for implementation on 3 November 2022 (November 2022 SEC Release). The Proposer believes that the proposal better facilitates General SEC Objective (a)¹ and the Modification Proposal should progress under Self-Governance rules.

2. Issue

What are the current arrangements?

Supplier Parties receive SRVs and Service Responses for Devices they own. However, only the individual User who currently owns that Device can access these SRVs and Service Responses. This means that SRVs and Service Responses sent by other Users can't be viewed if they are sent to a Device they own, regardless of the payload or significance of the SRV or Response. The Users in question may be sending SRVs or Service Responses concerning firmware updates or trying to connect Devices on the network the Device is part of.

What is the issue?

A Supplier stated in the Technical Specification Issue Resolution Subgroup (TSIRS) forum that it would be desirable to be able to view all the SRVs and Service Responses that are sent to a meter they own. Supplier Parties will receive Alerts based on SRVs sent by other Service Users to their meters. Currently, they have no visibility of this activity through the Service Audit Trail (SAT) data they have access to. They need to know which SRVs have been sent by a Service User to their meters so that they can make an informed decision of whether to ignore or action the Alerts they receive.

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

SEC Section H8 'DCC Services' details the requirements which the Self-Service Interface (SSI) follows, which will need to be amended. This is found in Sections H8.15-H8.18, where H8.16(b) states the SSI must (as a minimum) allow:

“a record of the Service Requests and Signed Pre-Commands sent by each User, and of the Acknowledgments, Pre-Commands, Service Responses and Alerts received by that User (during a period of no less than three months prior to any date on which that record is accessed), which shall be available only to that User”.

Therefore, a change is required to alter the SSI and to provide the SAT information for all SRVs and Service Responses to or from any meter a User owns.

What is the impact this is having?

The current lack of visibility and information for SRVs and Service Responses means Supplier Parties are receiving security related Alerts with no accompanying information or rationale.

Impact on consumers

Currently Suppliers and Distribution Network Parties receive Alerts that are may have been triggered by Parties other than themselves. This means they are unaware of any issues that are being investigated that may be affecting their customer.

3. Solution

Proposed Solution

The Proposed Solution is to allow Supplier Parties and Network Operators to view all the titles (the information from the Service Audit Trail, but no metadata or Service Request or Service Response payload information) of SRVs and Service Responses that have been associated with a Device that they own or is on their Network. By allowing this functionality, it will allow a Network Operator or a Responsible Supplier of a Device to check the Device for any SRVs or Service Responses that need to be actioned, or will assist for the purpose of auditing. The Devices that will be affected by this Proposed Solution will be any Device connected to the Home Area Network (HAN).

The Proposed Solution will ensure that only the SAT data is used for viewing any SRVs or Service Responses. This is so that any confidential data will remain undisclosed during any such audits or during a business process of checking for SRVs or Services Responses that need to be actioned from when the Device was owned by a previous Supplier prior to Change of Supplier (CoS). It will also allow the User to investigate any erratic behaviour from Devices that are showing more activity than usual. From there, a User will be able to diagnose the issue with the affected Device and remediate the issue faster than they would without this information.

The full set of business requirements used for this solution can be found in Annex A.

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 Supplier Parties and all Network Parties will be positively impacted by the Modification Proposal. The Proposed Solution will allow the User to access the full list of SRVs and Service Responses a Device has either sent or received. By allowing Users to have access to the titles of each SRV or Service Request, it will provide more information to help the User in investigating erratic Device behaviour and remedy any issues with the Device.

Respondents to the Refinement Consultation confirmed there are no SEC Party changes expected.

DCC System

The DCC Systems change are limited only to Self Service Interface (SSI) changes. The changes made will allow Supplier Parties and Network Parties to view the titles of SRVs and Service Responses associated with a Device they are responsible for.

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

SEC and subsidiary documents

The changes to the SEC required to deliver the Proposed Solution will be provided as part of the information returned in the full Impact Assessment. The legal text will therefore be provided after the Impact Assessment when an accurate list of changes can be returned.

Technical specification versions

There are no technical specification changes expected.

Consumers

Consumers are unlikely to be impacted. If a consumer is impacted, it is likely to be in a positive way with a Device of theirs being fixed sooner than would be the case now.

Other industry Codes

No other industry code is impacted by this Modification Proposal.

Greenhouse gas emissions

Greenhouse gas emissions are unaffected by this Modification Proposal.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is up to £300,000 up to and including PIT. This is to accommodate changes in the SSI. The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and Pre-Integration Testing (PIT)	£0 - £300,000

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

SECAS costs

The estimated SECAS implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

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

SEC Party costs

SEC Parties were asked to provide this as part of the Refinement Consultation. All respondents confirmed that they did not expect any costs to be incurred as a result of this change.

6. Implementation approach

Recommended 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 February 2022; or

- **29 June 2023** (June 2023 SEC Release) if a decision to approve is received after 3 February 2022 but on or before 29 September 2023.

SECAS has targeted the November 2022 SEC Release as the preferred implementation date for the Modification Proposal. This is due to the June 2022 SEC Release scope being agreed upon and having several DCC Systems impacting Modification Proposals targeted at that time. The Preliminary Assessment returned a three-month lead time, with an expected six-month lead time for System Integration Testing (SIT) and User Integration Testing (UIT), meaning that there is substantial time for the Modification Proposal to be developed and approved before the 3 February 2022 deadline. SEC Parties responding in the Refinement Consultation may require more than three months to make their own changes, making the implementation approach a reasonable one.

7. Assessment of the proposal

Observations on the issue

The Change Sub Committee (CSC) agreed this is an issue. One CSC member stated that they wanted to see the scope extended in the Refinement Process so that it would consider the views of Network Parties and Other SEC Parties, not just Supplier Parties as originally outlined. SECAS agreed this would form part of the discussions in the Refinement Process if converted to a Modification Proposal.

The other Panel Sub Committees had the following views to give on the Modification Proposal:

TABASC

The Technical Architecture and Business Architecture Sub Committee (TABASC) agreed that it would like to be kept updated on the progress of this Proposal. The rationale was that Service Requests and Responses, due to CoS events, could be withheld from current Users. Additionally, a member raised that questions over a User's ability to look at Service Requests/ Responses from competitors and this would need investigating.

Operations Group

The Operations Group confirmed its interest in the Draft Proposal. One member stated that any solution created must not allow the payload of these Service Requests or Responses to be viewed as it may constitute a breach of security and the General Data Protection Regulation (GDPR). Another member questioned the effectiveness of any solution which wouldn't allow a User to view the payload of the Service Request or Response. SECAS confirmed after consulting with the Security Sub Committee (SSC) about what data was being used (specifically, the SAT data to access the titles of SRVs and Service Responses rather than a data payload), the Proposed Solution would not cause security breaches or contravene the GDPR. SECAS believed that the Proposed Solution would have utility even if it can't access a SRV or Service Response payload, citing Working Group responses where members believe that just the SAT data would be beneficial for investigations.

Solution development

When asked about how they would benefit from the Proposed Solution, the Working Group members believe there is more of a use case for the Proposed Solution in investigating erratic behaviour from Devices they are responsible for, rather than actioning previous SRVs or Service Responses on Devices acquired through CoS. The Working Group stated that there would be additional benefits that would be realised if the Proposed Solution was implemented, such as investigations being completed, and decisions made at a faster rate than current.

The Working Group was asked about whether the Proposed Solution should only consist of Requirement 1 in the business requirements to reduce costs. Some believed that there wasn't a clear case for Network Parties having this access. The Working Group members rejected this. They believed that because the Requirement 2 would add little cost, they should include it if it provides a benefit to the Network Parties.

Support for Change

The Working Group was supportive of this change as the ability to view this information would assist Parties in resolving consumers' issues.

Five out of six Refinement Consultation respondents were supportive, again believing that understanding the reason a message was initiated would assist in consumer issue resolution.

Views against the General SEC Objectives

Proposer's views

The Proposer believes the Modification Proposal better facilitates General SEC Objective (a)², where it would contribute to the better operation of Devices at a premise that are experiencing unusual activity and require investigating. The Proposer also believes that it will provide additional benefits in the form of faster decision making for Users, which in turn provides greater efficiency and may pass through on to consumers.

Industry views

The Refinement Consultation responses were generally positive, with five out of six respondents (two Large Suppliers and three Network Operators) believing this information would help with effective management of consumers issues. Only one respondent (a Large Supplier) was not supportive. They believed that this change was a 'nice to have' feature but found it difficult to see any value for resolution of consumer issues. They did not believe that DNOs having sight of this information would resolve any issues.

² Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

Views against the consumer areas

Improved safety and reliability

Consumers may experience improved reliability as any issues they are experiencing which trigger an Alert may be more easily visible to the SEC Party that can resolve the issue.

Lower bills than would otherwise be the case

This modification is neutral against this area.

Reduced environmental damage

This modification is neutral against this area.

Improved quality of service

Consumers may experience improved quality of service as any issues they are experiencing which trigger an Alert may be more easily visible to the SEC Party that can resolve the issue.

Benefits for society as a whole

Where a consumer is experiencing an issue which prompts a SEC Party to issue a Service Request to investigate the problem, any Alerts or Responses received by another Party should be more easily interpreted to allow the speedy resolution of the consumer's issue.

Appendix 1: Progression timetable

This modification will now be presented to Change Board for approval to request the Impact Assessment. If approved the Impact Assessment will be requested.

Timetable	
Event/Action	Date
Draft Proposal raised	20 Aug 2020
Presented to Change Sub-Committee (CSC) for initial comment	25 Aug 2020
Proposal discussed with Sub-Committees	1 Sep 2020 – 9 Sep 2020
Presented to CSC for final comment and recommendation	29 Sep 2020
Presented to Panel for conversion to Modification Proposal	16 Oct 2020
Business Requirements developed with the Proposer	19 Oct 2020 – 23 Oct 2020
Business Requirements discussed at Working Group	4 Nov 2020
Modification discussed with TABASC	5 Nov 2020
Modification discussed with TABASC	7 Jan 2021
Modification discussed at Requirements Workshop	25 Jan 2021

Timetable	
Event/Action	Date
Modification discussed with TABASC	4 Mar 2021
Preliminary Assessment requested	5 Mar 2021
Preliminary Assessment returned	9 Apr 2021
Modification discussed at Working Group	5 May 2021
Refinement Consultation	17 May 2021 – 7 Jun 2021
Impact Assessment costs approved by Change Board	23 Jun 2021
Impact Assessment requested	24 Jun 2021
Impact Assessment returned	19 Aug 2021
Modification Report presented to CSC	28 Sep 2021
Modification Report Consultation	4 Oct 2021 – 22 Oct 2021
Change Board vote	24 Nov 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
CoS	Change of Supplier
DCC	Data Communications Company
GDPR	General Data Protection Regulation
HAN	Home Area Network
SAT	Service Audit Trail
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SRV	Service Request Variant
SSC	Security Sub Committee
SSI	Self Service Interface
TABASC	Technical Architecture and Business Architecture Sub Committee
TSIRS	Technical Specification Issue Resolution Subgroup