SEC
Smart Energy Code

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# DP183

# 'Post Commissioning Obligations'

## Modification Report

**Version 0.1**

**17 September 2021**

Corporate member of Plain English Campaign
Committed to clearer communication
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## About this document

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

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## Contact

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# 1. Summary

This proposal has been raised by Easton Brown from the Data Communications Company (DCC).

The DCC is required to provide several reports on failures in the Smart Metering Equipment Technical Specifications (SMETS) 2+ Post Commissioning process to DCC Users, the Smart Energy Code (SEC) Panel, each Communication Service Provider (CSP), and other Industry Parties. However, some scenarios whereby a Device may be successfully Commissioned could be defined as having failed under the current criteria set out in the SEC.

Failures in the Post Commissioning process are therefore being over-reported to a significant degree, resulting in time and resources being wasted on 'false positive' cases and diverting focus from genuine issues.

This modification seeks to amend the reporting criteria to give a more accurate view of the volumes of securely Commissioned Devices, and to ensure the reports provided are of material benefit to the Parties.

# 2. Issue

## What are the current arrangements?

As part of its obligations under SEC Appendix AC 'Inventory, Enrolment and Withdrawal Procedures', the DCC is required to report on failures in the Post Commissioning process for SMETS2+ Devices following their installation. The reporting is partly based on the sending of Service Request Variants (SRVs) to update Device Security Credentials and the subsequent Responses indicating Commands have been Successfully Executed.

The DCC reporting criteria for Post Commissioning Obligations are mandated in SEC Appendix AC section 5. A summary of the current requirements, and therefore the reporting criteria, are as follows:

- DCC User sending 2x SRV 6.17 'Issue Security Credentials' successfully;
- DCC User sending 2x SRV 6.15.2 'Update Security Credentials (Device)' successfully;
- DCC User sending SRV 6.15.1 'Update Security Credentials (Known Remote Party (KRP))' successfully;
- DSP checking that Device is communicating correctly;
- DSP checking that Recovery Trust Anchor Cell is populated correctly.

As the DCC reporting criteria was created before the DCC Systems had been built, there is currently no provision for reporting Commissioning as Successful when the process deviates from the defined pathway.

## What is the issue?

Using the above criteria, the DCC Post Commissioning reports record failures in the process, even though Devices may be communicating correctly and have the correct Security Certificates. This can

happen for several reasons, including Responses to Service Reference Variants (SRVs) timing out and Devices returning an 'empty' Execution Status, which counts as a failure under the current criteria. Also, if there is a Change of Supplier (CoS) prior to completion of Post Commissioning Obligations, the Device will continue to be reported as having failed Post Commissioning under the current criteria, despite correct Supplier Certificates being present.

This reporting criteria also fails to reflect design changes which have occurred over the past four years. For example, DCC Users can choose to send an SRV 6.21 'Request Handover of DCC Controlled Device' instead of SRV 6.15.1 if the Network Operator Trust Anchor Cells are populated with DCC credentials instead of Supplier Certificates.

Anomalous behaviour of the DCC User generated commands typically identify a failure rate of around 7%. Checks by the DCC on the actual Certificates populated on Devices revealed that the overall failure rate is around 1%. This reporting is therefore presenting a significantly worse view of the status of Devices Post Commissioning. When this analysis was presented to the Security Sub-Committee (SSC), it advised that the DCC should raise recommendations to improve the reporting and affect this via a SEC Modification.

## What is the impact this is having?

Due to over-reporting of Post Commissioning failures, DCC Users waste resources investigating Devices which have actually been Commissioned successfully. The CSPs also waste resources investigating and resolving Incidents for Communications Hub Functions (CHFs) which are incorrectly seen to have failed Post Commissioning, as SEC Appendix AC section 5.13 mandates that the DCC is required to raise an Incident for every 'failing' CHF.

The inaccuracy of published reporting to SEC Parties, and of SEC Party performance reporting to the SSC, can have a reputational impact on individual Parties and across the Industry. Currently, reported volumes of Devices which fail Post Commissioning breach the Critical National Infrastructure levels for risk to the network. However, the actual number of Devices that are not securely Commissioned falls within tolerance levels.

### Impact on consumers

This issue can result in consumers' time being wasted through unnecessary site visits to resolve non-existent faults.

## Appendix 1: Progression timetable

This Draft Proposal was raised on 17 September 2021 and will be presented to the Change Sub-Committee (CSC) on 28 September 2021 for initial comment. The Smart Energy Code Administrator and Secretariat (SECAS) will then discuss the modification with the relevant sub-committees to better understand the impact this issue is having and develop a business case for change.

| Timetable | |
|---|---|
| **Event/Action** | **Date** |
| Draft Proposal raised | 17 Sep 2021 |
| Presented to CSC for initial comment | 28 Sep 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** |
| CHF | Communications Hub Function |
| CoS | Change of Supplier |
| CSC | Change Sub-Committee |
| CSP | Communication Service Provider |
| DCC | Data Communications Company |
| KRP | Known Remote Party |
| SEC | Smart Energy Code |
| SECAS | Smart Energy Code Administrator and Secretariat |
| SMETS | Smart Metering Equipment Technical Specifications |
| SRV | Service Request Variant |
| SSC | Security Sub-Committee |