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## SEC Change Sub-Committee Meeting 30\_3108

31 August 2021, 10:00 – 11:30

Teleconference

### SECCSC\_30\_3108 – Draft Minutes

#### Attendees:

Representing	CSC Member
Change Sub-Committee Chair	Ali Beard (AB) ( <i>Alternate Chair</i> )
Large Suppliers	Sarah-Jane Russell (S-JR)
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
	Chris Brown (CBr)
Electricity Network Parties	Gemma Slaney (GS)
Other SEC Parties	Alastair Cobb (AC) ( <i>part</i> )

Representing	Other Participants
DCC	David Walsh (DW)
	Remi Oluwabamise (RO)
	Helen Metcalfe (HM)
	Tosin Adeoye (TA)
	Easton Brown (EB)
	Tom Rothery (TR) ( <i>part</i> )
	Chris Barlow (CB)
Ofgem	Abid Sheikh (AS) ( <i>part</i> )
SECAS	Holly Burton (HB) ( <i>Meeting Secretary</i> )
	Joe Hehir (JH)
	Mike Fenn (MF)
	Kev Duddy (KD)
	Abigail Hermon (AH)

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	Tim Newton (TN)
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## Apologies:

Representing	CSC Member
Consumers	Ed Rees
Change Sub-Committee Chair	David Kemp

## 1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the Change Sub-Committee (CSC) meeting.

The Meeting Secretary (HB) informed the CSC that no comments had been received on the minutes from the previous CSC meeting held on 27 July 2021. The CSC **APPROVED** the minutes as written.

## 2. Actions Outstanding

Action Reference	Action
28/02	SECAS to reach out to a CSC member (AC) offline to investigate how to better involve manufacturers in SEC modifications.
	SECAS reached out to AC to discuss how better to involve manufacturers in SEC mods, several options saw holding regular forums to improve communication as well as holding ad-hoc meetings. As such, SECAS noted the proposed suggestions and are looking at ways to incorporate them into the business-as-usual mod process. Several CSC members agreed that this action has not been fully addressed. Instead, SECAS/AC should reach out to Trade Associations (EUA & BEAMA) to enforce the point raised around engaging manufacturers in SEC Modifications. Status: <b>Closed</b>
28/04	SECAS to follow up with a CSC member (AC) offline to involve them in the assessment of DP168.
	SECAS has followed-up with AC and advised the possible solution. SECAS will invite AC to the next Requirements Workshop in which DP168 is discussed. Status: <b>Closed</b>
29/01	SECAS (JH) to follow up on the guidance to make sure this aligns with the Modification Report for SECMP0024.
	SECAS liaised with the Data Communications Company (DCC) who confirmed that the Comms Hub Firmware Management Overview document will be updated once SECMP0024 has been implemented to reflect the new DCC alert. A member (EL) advised there is an issue with the firmware management document in that, it does not address all the comments they raised as well as a lack of a response from the DCC to those comments. In addition, they raised concern that the document had been published by the DCC during the

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Action Reference	Action
	<p>SECMP0024 Modification Report Consultation and on the same day that they (EL) submitted their consultation response.</p> <p>SECAS (JH) advised that the DCC has since reached out to EL but due to a combination of leave, a meeting has not yet been arranged but it expected it to be shortly.</p> <p>The CSC agreed an action should be given against the DCC to monitor the progression of the document and the content within. SECAS (JH) suggested it would be suitable for the Operations Group (OPSG) to oversee the action given that SECMP0024 is pending implementation and that the Communications Hub Firmware Management Overview document refers to firmware management as opposed to the SEC.</p> <p>A member (GS) noted there is a generic issue with DCC guidance documents and timings around publication, in particular the DCC User Gateway Interface Design Specification (DUGIDS). It was also suggested that more pressure and expectation should be placed on the DCC where they have a DCC owned guidance document that is impacted by a modification, to be passed through the modification process as part of a Consultation. It is of no use to Users to have guidance documents that are either not available or are not accurate for any period of time after a modification has gone live. DCC (DW) noted that this could be addressed by adding a line confirming the document is to be updated as part of the Impact Assessment.</p> <p>A member (GS) questioned whether this would be enough as, there needs to be some form of User review so that if there is something that is not clear or not right then this can be addressed before publication. Ideally, this should be completed as part of the Refinement process.</p> <p>SECAS (AB) clarified Users will need to feed into changes against the DCC guidance documents.</p> <p>Status: <b>Closed</b></p>

**CSC30/01:** SECAS (KH)/AC to reach out to Trade Associations (EUA & BEAMA) in order to better involve manufacturers as part of the SEC modifications process.

**CSC30/02:** SECAS (JH) to liaise with SECAS (JM) seeking views on whether the CSC or the OPSG should monitor progress against a new action for DCC to seek feedback on Communications Hub Firmware Management Overview document, to ensure the document reflects Industry expectations, whilst ensuring the document is adequately updated on a regular basis.

**CSC30/03:** SECAS to set aside time at either the next Working Group meeting or next CSC meeting to discuss whether DCC guidance documents should be dealt with under modifications.

### 3. SEC Modification Progression

#### MP121 'Commissioning non-commissioned Devices after CoS'

The CSC was provided with a summary of Modification Proposal [MP121 'Commissioning non-commissioned Devices after CoS'](#).

Multiple responses were received as part of the Refinement Consultation, many of which were supportive of both options. The responses highlighted issues with the proposed automated Self Service

Interface (SSI) solution. When referred back to the Working Group, further discussion concluded that this solution option was not fit for purpose.

A member (CB) noted that this is currently being done from a Small Supplier perspective with no issues, however, did question whether this could be implemented sooner than the February 2022 SEC Release.

SECAS (KD) clarified the Operational Contract Management List and accompanying processes can be included following approval. However, The Refinement Consultation responses indicated Parties would need a three month lead time before implementation. This is in part to work on the backlog of Devices left in a non-commissioned state. Therefore February 2022 is the most appropriate date to implement the obligation.

A member (EL) noted that if this process was not codified then Suppliers will not be obliged to return install codes and may not do so.

A member (GS) noted the Refinement Consultation responses were not including in the meeting pack even though they have been published on the modifications' webpage, therefore requested this to be provided moving forward.

The CSC had no further comments.

The CSC:

- **AGREED** that MP121 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP121 should be progressed as a Self-Governance Modification

### MP149 'Effecting Changes to the Smart Energy Code efficiently'

The CSC was provided with a summary of Modification Proposal [MP149 'Effecting Changes to the Smart Energy Code efficiently'](#).

This modification was presented to the Working Group where support was shown against the principle whilst highlighting that that existing modification process is fit for purpose for new modifications. This was subsequently issued for Refinement Consultation where all responses were supportive of the change except for highlighting some concerns around the Legal Text. In particular, the delivery of Retail Energy Code (REC) and what could be done under this new Code, with further question around whether the SEC Panel should be given power to raise modifications.

Following this, the modification was returned to another Working Group where further rationale was discussed around SEC Panel being able to raise modifications, mainly noting the SEC states that the Panel will act as a Core Committee in changes being raised around Governance and Credit Cover. It was also noted that SECAS reviewed the REC Code Manager proposals and identified that mainly of the tasks related to the Change Process carried out by the REC Code Manager were already carried out by the CSC.

The CSC had no comments.

The CSC:

- **AGREED** that MP149 should be progressed to the Report Phase
- **APPROVED** the Modification Report

- **APPROVED** the implementation approach
- **AGREED** that MP149 should be progressed as an Authority-Determined Modification

## **MP180 'Market-wide Half Hourly Settlement Implementation'**

The CSC was provided with a summary of Modification Proposal [MP180 'Market-wide Half Hourly Settlement Implementation'](#).

Ofgem (AS) clarified SECAS has been working closely with Ofgem to collate the timetable for this modification, whilst remaining mindful that a Consultation will not take place as this is an Authority-Led Variation. [Ofgem highlighted that the industry consultations had taken place as part of the Market-wide Half Hourly Settlement \(MHHS\) Significant Code Review \(SCR\).](#)

The CSC had no further comments.

The CSC:

- **REFERRED** the MP180 Authority-Led Modification Report to the Change Board for vote

## **DP172 'Reduced CPA and CPL requirements for innovation and Device field trials'**

The CSC was provided with a summary of Draft Proposal [DP172 'Reduced CPA and CPL requirements for innovation and Device field trials'](#).

A member (CB) questioned whether the Security Sub-Committee (SSC) gave any guidance around how they would replace an in-depth analysis of Commercial Product Assurance (CPA) on these Devices. The concern is that this modification could cause untested issues for its Users, therefore, how would this risk be mitigated. SECAS (KD) responded that discussions so far did not cover a solution. However, one option under consideration was that a Device would need to meet a number of criteria, and that these Devices would then be assessed by SSC's choice of third party Consultant.

SECAS (AB) reiterated that there is currently no solution for this modification, therefore, SECAS are suggesting proceeding to the Refinement Process as opposed to Report Phase. Any solution options would need to be reviewed, discussed, and consulted on as per the standard Modification process.

A member (AC) suggested this is an area that needs to be understood as what is being agreed seems open ended and could potentially not meet the need for Devices to be properly secure. He was concerned that, as written, Suppliers might be spending a large sum of money in completing a DCC Impact Assessment which will ultimately be rejected. He suggested input should also be sought from Users who will be looking to use this.

A member (AC) suggested this modification has not been developed enough in terms of demonstrating what this capability is trying to do. DCC (DW) pointed out that this modification is a risk and is an unknown field which will require scrutiny to be passed through the DCC.

A member (GS) questioned whether the CSC are trying to get too involved in the detail, whilst understanding this is a complicated and technical problem and solution. This has now been presented to all Sub-Committees, with the SSC suggesting this should be explored further. She stated that she believed all the points raised are valid however, further concerns should be bottomed out as part of the Refinement Process. She had a concern about whether this has been reflected in the Modification timetable, to allow sufficient time for meeting discussions before progressing to future stages. Although

two Working Groups have been allocated, more discussions will need to be held before a Refinement Consultation is issued. SECAS agreed to extend the timetable in the modification report.

The CSC had no further comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP172 should be converted to a Modification Proposal
- **AGREED** that MP172 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP172 subject to the extensions discussed.

### DP176 'Customer Analytics Reporting'

The CSC was provided with a summary of new Draft Proposal [DP176 'Customer Analytics Reporting'](#).

A member (GS) noted in comparison with MP122B 'Operational Metrics – Part 2', the timetable for this modification will need to be reviewed and extended particularly as this relates to standards, there will be different User preferences. Secondly, although this is separate to MP122B, there might be a link to the way in which systems work which should be investigated, particularly in terms of how to get data from the Technical Operations Centre (TOC).

MP122B will simply be adding two or three additional reports, Suppliers will receive Communications Hub firmware metrics, Device firmware metrics and times for Alert reporting. A CSC member (GS) noted Suppliers will need to remain vigilant of the work and reporting currently taking place in order to avoid duplication, and to not assume that reports will be sent when scheduled as this sometimes does not happen.

The CSC had no further comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP176 should be converted to a Modification Proposal
- **AGREED** that MP176 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP176

### DP177 'Replacement CPA Evaluation Assurance and Certification Provider'

The CSC was provided with a summary of new Draft Proposal [DP177 'Replacement CPA Evaluation Assurance Certification Provider'](#).

A member (AC) noted this report was not interpreted in the way it was discussed, the report states the Proposer is looking to replace the CPA scheme, whereas the SSC are looking to improve the current process. SECAS (KD) clarified the SSC have surveyed Parties to seek feedback on all elements of the process and are holding meetings with the Department of Business, Energy and Industrial Strategy (BEIS) on whether to proceed.

The issue is clear however, a member (AC) was sceptical as to whether Industry would move away without trying to improve the scenario and no longer work with National Cyber Security Centre (NCSC). SECAS (KD) highlighted if SSC come back with a recommendation not to change Provider, then no more work will be required against this modification.

Looking at the Modification Report and SSC's comments, a member (GS) highlighted there was confirmation that work could continue with BEIS and NCSC and outcomes of this work would be accounted for by the modification.

Members believed it is too early to progress this modification to Refinement Process in light of SSC undertaking further assessment of the scheme and have not yet returned a recommendation and so, this modification should stay in development.

The CSC:

- **AGREED** further development is required to define and understand the issue

#### DP179 'DCC Boxed'

The CSC was provided with a summary of new Draft Proposal [DP179 'DCC Boxed'](#).

Currently, a User wishing to test its systems or Devices against DCC Systems must do so through remote or in-situ testing as set out in SEC Section H 'Testing Services' and SEC Appendix J 'Enduring Testing Approach Document' (ETAD), with a range of associated User-entry and connectivity steps which take time and incur cost.

As a result of the costs involved, and due to the nature of the DCC's release schedule, it is often the case that there is limited time available in the regulated User Integration Testing (UIT) environment.

Without more accessible and robust testing of new products and Devices in a realistic simulation of a live environment, design issues will continue to go unidentified prior to implementation, resulting in lower performance and higher costs to resolve across all industry Parties.

A member (GS) noted the importance of understanding the cost/benefit case, with appropriate backing data.

The CSC:

- **AGREED** further development is required to define and understand the issue

## 4. SEC Modification Timetables

The Chair (AB) highlighted that there has been a considerable increase in new and more complex modifications, leading to an increased workload for SECAS. In addition, there had been changes in resources available to the SECAS team. SECAS is currently working with a number of critical modifications that require time and effort such as MP122B and MP162.

SECAS has reviewed the current timetable against the prioritisation matrix and is recommending several modifications be placed on hold to allow the team to focus on a manageable number and ensure continued quality.

The CSC:

- **APPROVED** the packages of work and the progression timetables outlined in this paper

## 5. SEC Releases Update

SECAS (JH) presented an update on progress with upcoming SEC Releases. It was noted that MP180 has been added to the scope of the November 2021 SEC Release. This is an Authority-Led Variation and has been raised by the Authority in accordance with SEC Section D 'Modification Process' 9A.

For the February 2022 SEC Release, [MP160 'Certificate Signing Request forecasting'](#) has been removed from the provisional scope as a decision will not be made in time in order to make this Release. In addition, [MP109 'ADT and Exit Quarantine file delivery mechanism'](#) and [MP121 'Commissioning non-commissioned Devices after CoS'](#) have been added to the scope of this release as solutions for both modifications have been agreed which are non-DCC System impacting. There are currently seven modifications in total in scope of the February 2022 SEC Release, which have been included within the Release Implementation Document (RID). SECAS highlighted the full scope of a SEC Release should be set six months before go-live and therefore does not expect any further modifications to be added to the scope after this meeting.

There have been no changes to the scope of the June 2022 SEC Release.

As well as MP109, since the last meeting we have identified [MP119 'CH Alert Storm Consolidation'](#) and [MP134B 'Use of SMKI Certificates relating to a SoLR event - Part 2'](#) should be removed from the scope of the November 2022 SEC Release. MP119 is on hold until the Proposer decides how to progress the modification. A Preliminary Assessment has only recently been requested for MP134B and therefore the implementation timescales are still unknown.

The CSC:

- **BASELINED** the February 2022 SEC Release Implementation Document for the full scope of the release; and
- **NOTED** the updates on the 2021 and 2022 SEC Releases

## 6. CSC 2022 Meeting Dates

SECAS presented the proposed CSC meeting dates for 2022. SECAS will now circulate meeting invites up until April 2022, which is when the current Terms of Office end. Further calendar invites will be sent once the election process is complete.

The CSC:

- **APPROVED** the proposed meeting date schedule for 2022

## 7. Any Other Business (AOB)

There was no further business, and the Chair closed the meeting.

**Next Meeting:** 28 September 2021