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DP181

**‘Meter Asset Provider access to
asset related data held by the
DCC’**

Modification Report

Version 0.2

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Managed by



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.

Contents

1. Summary.....	3
2. Issue.....	3
Appendix 1: Progression timetable	6
Appendix 2: Glossary	6

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1. Summary

This proposal has been raised by Lynne Hargrave on behalf of Calvin Asset Management Ltd.

Meter Asset Providers (MAPs) wish to access smart asset-related data held by the Data Communications Company (DCC) to allow the MAP to assess and manage asset health for any smart assets it owns. This will enable MAPs to manage their asset portfolios effectively and efficiently, leading to reduced volumes of faulty Devices due to out of date firmware or failed Device commissioning.

Under the Smart Energy Code (SEC), the inventory data requested by MAPs is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3.

The Proposer suggests that SEC Section M4.3 should be amended to allow the DCC to release asset-related inventory data to the MAP owning the asset.

Following discussions during the Development Stage, the scope of this proposal will now allow Device Manufacturers to have access to the same dataset.

2. Issue

What are the current arrangements?

The DCC holds data relating to smart assets in the Smart Meter Inventory (SMI). This asset-related inventory data is provided to the DCC by Suppliers, as DCC Users, as part of their role as Parties to the SEC.

Under the SEC, this inventory is classed as Confidential Information. SEC Section M4.1 prohibits the disclosure of a SEC Party's Confidential Information to any person apart from in specific circumstances set out in SEC Section M4.3.

What is the issue?

MAPs wish to access smart asset-related data held by the DCC in order to allow them to assess and manage asset health for any smart assets they own. The data items that MAPs wish to access are:

- Global Unique Identifier (GUID)
- Device type, manufacturer and model
- Device firmware version
- Device status
- CSP region

The asset related data required by MAPs is held in the DCC Systems and is mastered by the DCC System. The data requested relates only to the metering asset located at a site and does not, in any

way, relate to the Responsible Supplier¹ using the asset. No information is being sought on the identity of the Responsible Supplier.

MAPs have requested that the DCC provide a 'pay-for' data service (DCC Elective Communications Service (ECS)) to MAPs whereby the MAPs taking the service will meet the full cost of providing the service. As a result, there would be no cost implications for DCC Users. However, a text change to the SEC will be required to allow this service to be provided.

Following discussions during the Development Stage, the scope of this proposal will now allow Device Manufacturers to have access to the same dataset.

What is the impact this is having?

MAPs are currently unable to access DCC held data relating to the assets that they own. This limits the MAP's ability to manage their asset portfolios effectively and efficiently, leading to increased volumes of faulty Devices due to out of date firmware or failed Device commissioning. MAPs are seeking access to firmware data and DCC status information which will allow them to work with Responsible Suppliers to help identify and facilitate firmware updates and Device commissioning. This would reduce the risk that Devices provide a diminished smart service to the end consumers.

Impact on consumers

With MAPs not being granted access to the data they require, consumers may be left with Devices that are not carrying up to date firmware and may display faulty behaviour, or Devices remaining in a non-commissioned state.

3. Assessment of the proposal

Observations on the issue

SECAS's views

During the Development Stage, SECAS asked whether Suppliers could provide the data requested to MAPs through their back-office systems. The Proposer stated that this was considered in a DCC data sharing consultation. The results of this consultation are yet to be published. MAPs are already in the position where they can ask Suppliers for this data. However, MAPs are looking for access to the DCC held central data and not the information held in Supplier systems (which may or may not be the same as the DCC held data).

To cover a full MAP portfolio, each MAP would need to ask each Supplier for the data, who in turn would need to request the same data from the DCC to pass back to the requesting MAP. This would mean that each MAP would need to issue over 70 requests for data every month and every Supplier would need to respond to numerous MAP requests each month by requesting the data from the DCC and then passing the data back to the MAPs. This method of working is deemed unsustainable by the MAP, the DCC or the Supplier back-offices due to the volume of requests and responses that will

¹ the Responsible Supplier is, for Electricity Smart Metering Equipment (ESME), the Import Supplier or for Gas Smart Metering Equipment (GSME), the Gas Supplier.

need to be exchanged on a regular basis. The Proposer believes that it is far simpler for the DCC to provide this data directly to the MAPs. This should provide a simpler mechanism for the DCC, Suppliers and MAPs.

Views of the Sub-Committee Chairs

Sub-Committee Chairs advised that the service wouldn't necessary be exclusive due to 'Meter Asset Provider' not currently being a defined term within the SEC. The Proposer has responded to state that the legal text could detail that the data can only be disclosed to the asset owner

The Security Sub-Committee (SSC) Chair raised a point that in theory, an individual could sign up to the SEC as an Other SEC Party and pay to use the DCC ECS to access the data which could be a potential security concern as the modification progresses. The Proposer agrees that this is a potential security risk and so to mitigate the risk, the party wishing to access the data may have to prove that they are the asset owners. This will be further investigated during the Refinement Process.

The Chairs stated that the current data set requested is not considered confidential. They commented that data is only confidential when the data enables the party to identify an individual customer. The Proposer agrees that the data is not confidential but advises that the DCC thinks otherwise. Advice will be sought from SEC Lawyers to clarify this point.

SECAS further advised that there are multiple ways of accessing the data, such as using a DCC ECS, and relevant changes to the SEC may prove to be the most efficient method. The Proposer is aware that there is another opportunity to access the data through Other Users² and that certain MAPs already use these services. The Proposer is concerned that the DCC may wish to end this service due to confidentiality. The data requested is classed as Supplier data and in theory should not be shared with any other parties including Other Users.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair commented that the data can be obtained through a DCC Technical Operations Centre (TOC) report as the data is already available. Depending on the cost, MAPs could potentially decide whether or not to purchase the report from the DCC. The Proposer advised that they have previously attempted to purchase the data from the DCC. However, as DCC believes the data is confidential, this route has been unsuccessful.

In terms of the asset data MAPs wish to obtain, the SSC Chair advised that MAPs would most likely want to know which Supplier the asset is currently being used by to better understand if the meter has been subject to churn. The Chairs commented that the Suppliers may not wish to disclose certain data attributes. The Proposer commented that ideally MAPs would like to know who the Responsible Supplier is, but they generally already know this information, and so gaining access would only be used to cross reference their own data. The Proposer intentionally left this information out of the proposal as it is not essential.

Views of Other SEC Parties

During the Development Stage, SECAS presented the proposal to the Other SEC Parties. The Parties were happy with the proposal and two Device Manufacturers requested that the scope of the modification be widened to allow the data disclosure to Device Manufacturers as well as MAPs. The

² Other Users are Users that are not an Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor, Gas Transporter or Registered Supplier Agent.

Proposer is happy to include this within the scope of the modification as long as Device Manufacturers have access to the same dataset. SECAS and the Proposer will engage with Device Manufacturers to understand their requirements.

An Other User was also present who commented that if the data is obtained from the DCC, it could have a negative impact on their business model. The Proposer is aware that Other Users can provide asset related data and currently utilises this service. They stated that if a commercial provider has developed a pay-for service that is more cost efficient than what the DCC is willing to provide, then MAPs are likely to use these third-party providers instead. There are two points to consider when using such a third-party 'pay-for' service. Firstly, the Other User's access to the asset data may be called into question as the DCC considers the information to be confidential, and so reclassifying the data needs to be assessed. Secondly, the rate at which Other Users can gain the data MAPs need is limited to an MPxN per day limit. This means that data can only be retrieved gradually using this route, whilst a DCC-procured report will allow a MAP to access the data in a single request. This makes the process much quicker and easier for the DCC to manage.

Appendix 1: Progression timetable

This Draft Proposal was raised on 8 September 2021. SECAS is in the process of presenting the proposal to the SEC Sub-committees to understand the impacts of the issue before presenting to the Change Sub-Committee (CSC) for initial comment. Following a review of the discussions held, and engagement with Device Manufacturers, DP181 will return to the CSC for recommendation that it proceeds to the Refinement Process on 26 October 2021.

Timetable	
Event/Action	Date
Draft Proposal raised	8 Sep 2021
Presented to SEC Sub-Committees for input	Sep 2021
Presented to CSC for initial comment	28 Sep 2021
CSC converts Draft Proposal to Modification Proposal	26 Oct 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
ECS	Elective Communication Service
ESME	Electricity Smart Metering Equipment
GSME	Gas Smart Metering Equipment
GUID	Global Unique Identifier

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
MAP	Meter Asset Provider
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMI	Smart Metering Inventory
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TOC	Technical Operations Centre