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SEC Change Board Meeting 57

25 August 2021, 10:00 – 10:45

Teleconference

SECCB_57_2508- Draft Minutes

Attendees:

Category	Change Board Members
Change Board Chair	David Kemp (DK)
Large Suppliers	Robert Johnstone (RJ)
	David Rodger (DR)
	Sarah-Jane Russell (S-JR)
	Alex Hurcombe (AL)
Small Suppliers	Daniel Davies (DD) *(alternate for Carolyn Burns)*
	Gareth Evans (GE)
Network Parties	Gemma Slaney (GS)
	Paul Fitzgerald (PF)
	David Mitchell (DM)
Other SEC Parties	Gerdjan Busker (GB)
	Alastair Cobb (AC)

Representing	Other Participants
Data Communications Company (DCC)	David Walsh (DW)
Smart Energy Code Administrator and Secretariat (SECAS)	Holly Burton (HB) *(Meeting Secretary)*
	Ali Beard (AB)
	Joe Hehir (JH)

Apologies:

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Representing	Participant
Large Suppliers	Emslie Law
	Tim Larcher
Other SEC Parties	Mike Woodhall
Consumers	Ed Rees

1. Approval of Previous Meeting Minutes

The Secretary confirmed no comments were received on the minutes from the previous Change Board meeting held on Wednesday 28 July 2021. The Change Board **APPROVED** the minutes as written.

2. Actions Outstanding

Action Ref	Action
55/01	The DCC (ST) to draw out the effort and costs of manually inputting Communications Hub Stock Transfers, to support the cost benefit assessment for MP140.
It was noted that the DCC agreed to share this information with the SEC Working Group alongside the DCC Impact Assessment, which is expected to be released on 26 August 2021. Action: **Open.**	

3. SECMP0024 'Enduring Approach to Communication Hub Firmware Management' Change Board vote

The Change Board was invited to perform the final vote on SECMP0024 'Enduring Approach to Communication Hub Firmware Management'.

Three responses were received to the Modification Report Consultation (MRC), all of which were supportive of this change. One respondent noted concerns over the Communications Hub Firmware Management Overview document, which has been developed alongside this modification. The respondent advised this had previously been fed back but had received no response from the DCC. Secondly, the respondent had not been able to review the document before submitting their consultation response given that the document had only been published a few hours prior to the response submission. The DCC has since reached out to the corresponding Party and will be holding a session with them to try and address all concerns raised.

A Change Board member (AH) considered their organisation would not take advantage of the change. Their biggest issue with Communications Hub firmware management has been that they are impeded by not knowing when this is going to happen as opposed to knowing when it has happened as it affects any firmware updates being made to any other Devices on the Home Area Network (HAN). AH was hesitant as to whether the benefits of this modification outweighed the costs.

Another Change Board member (DR) echoed the points above whilst stressing the main issue is knowing when the Communications Hub updates are planned or in progress. A further Change Board

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member (S-JR) also agreed the difficulty in trying to justify the benefits outweighing the costs of this modification.

A Change Board member (DD) highlighted there is limited benefit to knowing when Communications Hub updated have happened, whilst also agreeing there is an issue around not knowing when an update will be sent before time. However, there is benefit in receiving something proactively to state the firmware has been updated in order for Suppliers to update their own internal systems with the firmware version, rather than having to send Service Requests to retrieve this information.

SECAS (JH) clarified that as this modification was raised four years ago, the previous solution was completely different to the solution in place now. An end-to-end process was previously in place for Suppliers to feed in Global Unique Identifiers (GUIDs) to the DCC and work with it during the pilot phase. Suppliers would have received far more oversight for when these firmware updates will happen as opposed to the current Proposed Solution. There were two methods to facilitate the old solution; the first was via the Self-Service Interface (SSI), and the second was via new DCC User Interface Specification (DUIS) Service Requests. Upon receiving the Preliminary Assessment, the costs for the cheaper method were still over £1m up to the end of Pre-Integration Testing (PIT). As a result, this was taken to the Technical Architecture and Business Architecture Sub-Committee (TABASC) who considered that there was no real business case for the solution. Work has since been done to identify the minimum viable product which was to provide a new DCC Alert upon firmware activation which SECMP0024 is now proposing.

The DCC (DW) noted that this modification has been previously presented to the Working Group who had strongly recommended this solution proceed with further support from the Refinement Consultation. This work has been mentioned in MP122B 'Operational Metrics – Part 2' and if SECMP0024 is approved, this will reduce the costs of MP122B. There have been strong recommendations to proceed with this modification over various months with Working Group members previously confirming the change will be of considerable help. The Chair confirmed that while approval of SECMP0024 would reduce the costs under MP122B, the two modifications were not dependent on each other.

The Change Board proceeded to vote.

Change Board Vote – SECMP0024 decision:

The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	1	3	0	**Reject**
Small Suppliers	2	0	0	**Approve**
Network Parties	0	0	3	**-**
Other SEC Parties	1	0	1	**Approve**
Consumers	0	0	0	**-**
			Overall conclusion:	**Approve**

The majority view of the Change Board is that SECMP0024 will better facilitate SEC Objectives (a)[1] and (b)[2] for the reasons given in the Modification Report. Members who voted to reject SECMP0024

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

[2] Enable the DCC to comply at all times with the objectives of the DCC and to discharge the other obligations imposed upon it by the DCC License

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did not believe the benefits of this change would outweigh the costs, and so wouldn't better facilitate any of the objectives.

Network Party members and one Other SEC Party member abstained after noting the mixed views of Supplier members. They considered that as they were unsure whether the benefits would outweigh the costs and that SECMP0024 would not impact their Party Categories, they did not want to sway the overall decision.

The Change Board:

- **AGREED** that SECMP0024 should proceed to vote;
- **AGREED** that SECMP0024 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this recommendation against the General SEC Objectives.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the SEC Panel to do so. This referral period will close at **5pm** on **Thursday 9 September 2021.**

If no referrals are received by this date, then SECMP0024 will be implemented on 30 June 2022 as part of the June 2022 SEC Release.

A Change Board member (GE) further noted that each modification should be looked at against its own merits, and Parties should not be put in a position to approve a modification if it is only to support a solution for another modification. Whilst it is appreciated that there is a backlog of modifications, this scenario should be avoided as much as practically possible.

The DCC (DW) noted it had been subjected to pressure for not considering cross-modification benefits against other modifications and changes going through the system. However, MP122B is not predicated on SECMP0024 being progressed, it is a separate piece of work. If SECMP0024 was rejected, then the relevant aspects would need to be undertaken as part of the MP122B solution.

A Change Board member (AH) apologised for their organisation not responding to the MRC with their views which had triggered the discussion points prior to the vote. The learning point is for Parties to make clear their views on a modification in the MRC to help inform Change Board members of these views ahead of the discussions at the meeting.

A Change Board member (GS) echoed that where modifications effect a particular Party, the Change Board can only argue against the information known at that time which is likely to come through consultations.

Change Board members agreed it would be beneficial for SECAS to issue communication as part of MRCs highlighting the importance of seeking industry views in order to help support Change Board decisions. SECAS agreed to add lines to this effect into its emails and other communications when MRCs are issued.

Action 57/01: SECAS to update its emails announcing MRCs to highlight the importance of Parties providing their views on the modification to help inform the Change Board when it votes.

4. MP104 'Security Improvements' Change Board Vote

The Change Board was invited to perform the final vote on MP104 'Security Improvements'.

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SECAS (AB) noted three responses were received in regard to the MRC, all of which were supportive of this change. All three respondents believed this modification better facilitated SEC Objective (a) as it would improve efficiency provision, installation, operation and interoperability of smart metering systems. All respondents believed this modification would better facilitate SEC Objective (f) as it would ensure the protection of data and the security of data and systems. One respondent believed this modification would better facilitate SEC Objective (g) as it would facilitate the efficient and transparent administration and implementation of the SEC.

One Network Party thought the report should be transferred automatically to SharePoint for the Security Sub-Committee (SSC). SECAS and the DCC have responded, noting the report will only be provided to the SSC and therefore automation is considered unnecessary.

The Modification Report stated it will cost roughly £560k for implementation with an additional £98k for early live application support. However, the DCC has challenged these costs which resulted in a reduction to £494k for implementation costs and £41k for early live support.

A Change Board member (RJ) questioned in terms of the solution and identifying Users that have incorrectly signed XML wrappers, would this not be identifiable through a Security Audit. SECAS (AB) clarified that Security Audits will take significant time to perform across all Users however, once the solution is implemented, if a User is not signing correctly then none of their Service Requests will be sent through which would incur huge impacts on the business. The idea of the reporting starting in December 2021 is to highlight those who are not using the system as it should be and to then work with them to ensure compliance.

The Change Board proceeded to vote.

Change Board Vote – MP104 decision:

The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	3	0	1	**Approve**
Small Suppliers	2	0	0	**Approve**
Network Parties	3	0	0	**Approve**
Other SEC Parties	2	0	0	**Approve**
Consumers	0	0	0	**-**
			Overall conclusion:	**Approve**

The view of the Change Board is that MP104 will better facilitate SEC Objectives (a) and (f)[3], for the reasons given by the Proposer in the Modification Report. Some members also agreed it would better facilitate SEC Objective (g)[4] for the reasons given in consultation responses.

The Change Board:

- **AGREED** that MP104 should proceed to vote;
- **AGREED** that MP104 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this recommendation against the General SEC Objectives.

[3] Ensure the protection of data and the security of data and systems in the operation of the SEC

[4] Facilitate the efficient and transparent administration and implementation of the SEC

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There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the SEC Panel to do so. This referral period will close at **5pm** on **Thursday 9 September 2021.**

If no referrals are received by this date, then MP104 will be implemented on 30 June 2022 as part of the June 2022 SEC Release.

5. Any Other Business

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

Next scheduled meeting date: 29 September 2021

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