Paper Reference:	SECP_97_1510_15
Action:	For Decision

SEC Panel Sub-Committee Report

1.   Purpose and highlights

This paper provides the Panel with an update on recent activities from the Panel Sub-Committees, including key issues discussed, and details specific points the Sub-Committees would like to bring to the Panel's attention. The Panel is requested to note the updates and endorse the concerns raised by the Sub-Committees.

Highlights for the Panel's attention include:

- The OPSG (see Section 2.3) expressed extreme unhappiness about a short-notice proposal from the DCC to execute a technical refresh at the DSP requiring 14 complete service outages; the DCC said this must start in November. This brings serious operational impacts on Users and potentially end consumers. The OPSG consider this a significant failure of contract management, customer engagement, and maintenance management.

- The OPSG (see Section 2.3) discussed capacity constraints for User firmware downloads at the DCO. These constraints are causing disruption to Users, including the need to replan processes and restrict activities. The OPSG again requested a remediation plan from the DCC showing when compliance with the SEC will be achieved.

- As directed by the Panel, the OPSG started its consideration of DCC's proposals for new metrics and targets. The OPSG highlighted the danger of basing standards purely on the current capability of DCC (as is proposed), rather than taking account of the actual service requirement. The OPSG also noted that an approved Mod (MP122 'Operational Metrics') had previously considered this topic in detail.

- As part of the consideration of the Mass Rollout in CSPN, OPSG Members raised the question of who would bear the costs of replacing CHs which cannot be contacted or updated.

- An impact assessment was provided by SECAS on the impacts of aligning SMDA Membership with SEC Parties. The SMDASC discussed the potential for non-SEC Parties to gain access via an administration fee of £2,250 (the previous cost of SMDA membership). Clarification was required about whether access via the administration fee is only applicable to current SMDA members or any new organisation. One SMDA member is not a SEC Party and will be contacted following confirmation.

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2.   Technical Operations

2.1   TABASC Highlights

The TABASC met once in the last month. The meeting covered the following topics:

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SECAS presented the TABASC with an interim progress update on the project looking at developing an Integrated SMETS/BSC CoP11 Metering Solution, as well as a recommendation to move directly to Workstream 3 as Workstream 2 was no longer required following the findings of Workstream 1. The TABASC noted the progress update and agreed to move directly to Workstream 3.

Modifications

SECAS presented the DCC's Preliminary Assessment for Modification Proposal MP162 'SEC changes required to deliver MHHS' and sought the TABASC's initial views on the DCC's response and any areas the TABASC would like to focus on in more detail. SECAS informed the TABASC that MP125 'Correcting Device Information for the ESME Variant' is currently undergoing the Refinement Process and the DCC has completed its Preliminary Assessment. SECAS provided a summary of new Draft Proposal DP179 'DCC Boxed' and sought initial views and comments from the TABASC on this modification at this stage of the framework.

Provisional November 2022 SEC Release Scope

SECAS provided an update on the proposed scope of changes for the DCC Systems as part of the November 2022 SEC Systems Release and invited the TABASC to provide any comments on the proposed release scope. The TABASC discussed the provisional scope on the DCC Systems for the November 2022 SEC Release and the draft Release Implementation Document, and asked SECAS to ensure that the relevant governance groups had oversight, and to ascertain which governance group has ultimate responsibility.

SEC Strategic Events Update

SECAS sought TABASC input to and endorsement of the suggested approach to managing net zero related strategic events including Electric Vehicles and Gas Decarbonisation. The TABASC noted the contents of this paper and endorsed the proposed approach to planning for these events.

Strategic Technical Design Review

SECAS proposed the next steps following on from the concluded Strategic Technical Design Review Project and invited the TABASC to discuss the options put forward and agree the next phase of this work. The TABASC noted the contents of this paper, and asked SECAS to collect feedback from members whether a proactive or passive approach should be taken to the options outlined before any Project Briefs are created for the options that need further study.

2.2   TAG Highlights

The TAG met three times during the last month to discuss the following topics:

SMETS1 FOC Mixed Installations Test Approach Document

The TAG reviewed changes to the SMETS1 FOC Mixed Installations Test Approach Document (TAD), which incorporated feedback from TAG82. The TAG requested the DCC to ensure that the differences between Smart Meter System Operators (SMSOs) were documented and provided to users prior to the TAG making its testing completion decision, and asked the DCC to report each SMSO exception testing result separately in the Test Completion Report (TCR). The TAG agreed to approve the TAD.

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SMETS1 Uplift 3.0 Test Approach Document

The TAG reviewed changes to the SMETS1 Uplift 3.0 TAD, which incorporated feedback from TAG82. The TAG discussed the document and approved the TAD, however deferred discussion of test completion for the Uplift 3.0 release until its meeting on 8 October.

SMETS1 Uplift 2.2 Test Completion

The DCC presented the TAG with the Test Completion Report (TCR) for SMETS1 FOC Uplift 2.2 Drop 1 Testing. The TAG reviewed the Testing Issues closed without retest and the proposed exclusions from FOC Testing Issue thresholds, agreeing both the variance in testing and the proposed exclusions. The TAG discussed the Exit Criteria for SMETS1 FOC Uplift 2.2 and agreed testing had been completed satisfactorily.

Test Automation Framework

The DCC provided the TAG with the financial and quality benefits of the Test Automation Framework (TAF). The TAG discussed the cost benefits associated with the TAF and foresaw no major issues. The TAG did however highlight several risks around delivery and implementation. These risks included the time-sensitivity of the programmes' benefits profile, the dependency on robotics to deliver improvements to testing, and the potential for the administrative and commercial burden from using robotics to be greater than forecast by the DCC. The TAG agreed the DCC proposal was reliant on robotics beyond what the TAG was comfortable with, but that adequate mitigations for the risks associated with robotics could be put into place.

November 2021 DCC Test Completion Report

The DCC presented the TAG with the November 2021 DCC Test Completion Report, which the TAG discussed. It became apparent that the DCC were experiencing issues sourcing Devices for testing, and a future meeting between SECAS and the DCC was proposed to discuss this issue. The TAG explored the DCC's proposed variances in scope and Testing Issue exclusions, agreeing both the variances in scope and the proposed exclusions.

2.3   Operations Group Highlights

The Operations Group met twice in the last month. The meeting covered the following topics:

CSP N Performance & Reporting

The DCC reported that Communication Service Provider North (CSP N) had achieved 78.06% PM2 performance in August, higher than the remediation plan upper target of 69% for the month. The DCC noted that performance in September had been impacted by configuration issues and had been tracking at approximately 71%.

CSP N Mass Over-the-Air (OTA) deployment

The DCC noted that over 1.1 million Communication Hubs (CHs) have been successfully upgraded to R2.03.3, representing approximately 94% of installed CHs in CSP North; this was achieved over a period of 8 weeks. The DCC reported that all CHs have had at least one upgrade attempt: the DCC and the Service Provider are developing processes for investigating and rectifying failures. OPSG Members raised the question of how the costs of replacing faulty devices would be allocated.

The DCC are investigating the impact the Mass OTA activity had on PM3.1 *"Percentage of Category 2 HAN interface commands delivered to DCC WAN Gateway interface within relevant Target Response Time"* performance over July, August and September.

November 21 SEC Release

The OPSG reviewed the Live Services Criteria (LSC) for the November 21 SEC Release. The OPSG raised comments regarding the DCO Capacity, FOC Incidents and Stability and underlying technical refresh although agreed with the DCC's view that the release is ready for deployment into live.

DCO Capacity

The DCC provided an update on the OPSG request for a clear problem statement and remediation plan regarding the Dual Control Organization (DCO) capacity on Initial Operating Capability (IOC) firmware downloads and traffic. The constraints on capacity are causing at least one SEC Party to revise their plans and incur costs for process changes.

The OPSG noted that the remediation plan did not provide a clear indication of the impact the planned activities will have on DCO capacity and when the DCC intend to bring themselves into SEC compliance.

The OPSG asked if there are any trade-off between the volume of migrations and the capacity available for User firmware downloads.

Service Outage Strategy

The DCC presented an overview of the current scale and impact of service outages (including Planned/Unplanned Maintenance, Incidents, BCDR) on the overall availability of the DCC service. The DCC noted areas of focus to investigate and the need to identify any changes that could mitigate or reduce the volume and impact of service outages.

The DCC agreed to return to the OPSG in January 2022 with an update on the focus area investigation and proposals.

DSP Technical Refresh

The DCC requested the OPSG consider options to undertake a significant Technical Refresh of the DSP components that could require up to 14 additional Maintenance windows, each requiring a full service outage. The DCC noted that critical components are due to reach their end of life at the end of the original contract (October 2021) and requires refreshing to ensure the service continues to be secure and reliable.

The OPSG expressed extreme frustration that the DCC would have known about this risk for a significant time, and the short notice statement from DCC of "must do, starting in November" has left industry in a very difficult position. The OPSG noted it

is disappointment in the DCC's late notification and engagement on a significant technical refresh that may require substantial outages of the service. The OPSG raised concerns with adding further outages in Winter due to the risk to Prepayment customers' ability to top up. Members also highlighted that the behaviour of Prepayment customers changes in November, making this a particularly bad month for further service outages. The OPSG noted the current particularly difficult operational circumstances because of the need to execute SoLR events.

The OPSG highlighted that the notice being given was outside the SEC requirement for notification of Planned Maintenance.

The OPSG considered that the nature and timing of the proposal from DCC highlighted a significant failure of customer engagement, contract management, and maintenance management.

The OPSG said that there was insufficient information on the options, risks and impacts to make a clear decision on an approach. The OPSG requested the DCC engage with TABASC and SSC to discuss

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the architectural and security risks/benefits of this activity. The OPSG agreed to hold an extraordinary meeting in October to discuss further, with a particular focus on the proposed November outages.

OPR/SEC PMR Targets and Measures

Following discussion at the SEC Panel in September, the DCC were given approval to engage with the OPSG to develop and refine targets and measures to be updated or added to the SEC to support Ofgem's Operational Performance Regime (OPR).

The DCC provided an overview of the plan and activities to design and implement an agreeable set of SEC Performance Measurement Report (PMR) Targets and Measures to address and support implementation of an interim Operational Performance Regime (OPR) for regulatory year 2022/23.

The OPSG highlighted that simply setting targets on the basis of current DCC capability, without regard to the actual service need is unsatisfactory. The DCC proposals do not yet set out a realistic path for giving proposed new metrics and targets sufficient consideration. The OPSG noted that this topic had been considered in depth as part of MP122.

The DCC plan to return to the next OPSG with proposals on Targets and Measures and a mock-up of the proposed PMR, so that the process for review and consideration can be planned.

Performance Indicator Reporting Summary

SECAS and the DCC presented a high-level summary of the Business Process performance for July 2021: this was enabled by the new reporting functionality delivered by MP122A.

There has been an improvement in performance of some business processes, particularly Change of Supplier (CoS) and Meter Reads in CSP N. The OPSG noted that although the transparency in these trends is appreciated, the performance being achieved does not meet the level required for these business processes, and a structured, systematic approach to understanding causes and identifying improvements is necessary. In relation to this, the OPSG reiterated its request for DCC to provide a structured process for reviewing tariff update performance.
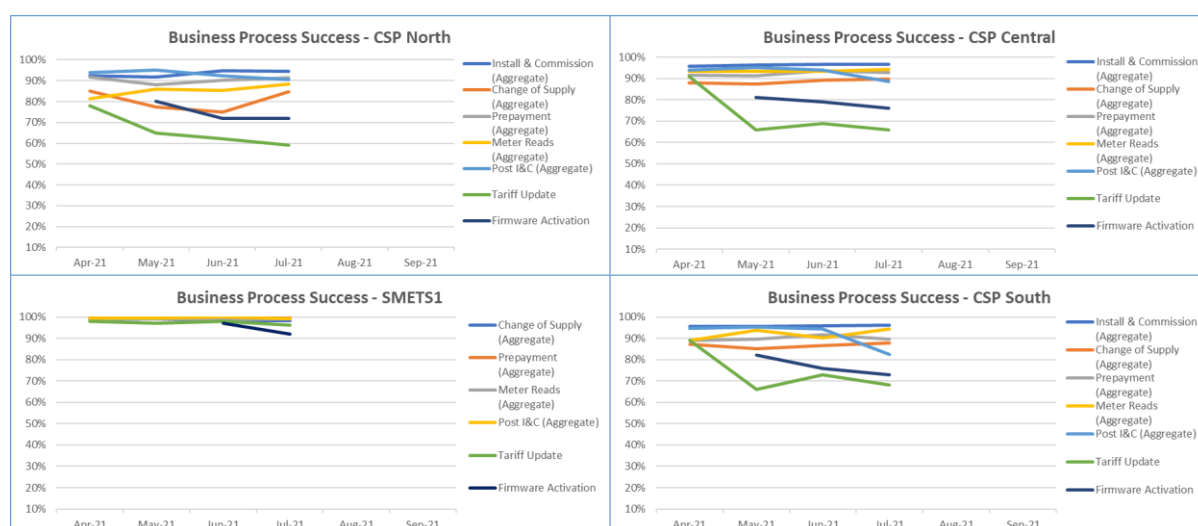

Fig 1. Performance Indicator Summary – Regional Business Process success

Service Performance

The OPSG noted that one Code Performance Measure (CPM) was below Target Service Level in the July 2021 Performance Measurement Report (PMR). CPM1 '*Percentage of On-Demand Service Responses delivered within the applicable Target Resolution Time*' was below Target Service Level at 97.13% (previously 97.03%). CPM1 had been below Minimum Service Level for the last 13 months;

with this being the second time that this measure has been above the Minimum Service Level since June 2020. CPM1 has been below Target Service Level since July 2018.

This shortfall was principally due to the failure to achieve the performance standard for OTA Firmware Downloads (Metric PM2) in CSPN. This constitutes a continuation of the performance shortfall for PM2, which has been below the Minimum Service level for the previous 23 months (and below Target Service Level for the previous 29 months).

Further details and commentary can be found in the SEC Panel DCC Reporting paper (SECP_97_1510_16 – DCC Reporting).

3. Security Sub-Committee and SMKI PMA

3.1 Assurance and Compliance Status Decisions

The SSC set the compliance status for three Full User Security Assessments (FUSAs), two Verification User Security Assessments (VUSA) and one Security Self-Assessment (SSA) in September 2021. Details can be found in the confidential Appendix A.

3.2 Director's Letters

The SSC reviewed one Director's Letter following a FUSA and one Director's Letter following a VUSA in September 2021.

3.3 SSC Highlights

Common Issues – Cloud Computing

The User CIO presented information for SSC to consider relating to User Security Assessments and the use of Cloud Computing. The SSC agreed to the proposals put forward by the User CIO, taking into account NCSC's 'Cloud Security Principles'.

SCF Updates

The User CIO and SECAS presented proposed Security Controls Framework (SCF) updates to include guidance on the use of cloud computing, and a minor update to Part 2 Appendix F to include a clarification in the scope of a Verification User Security Assessment. The SSC approved the proposed SCF Updates to be published as SCF v2.5.

CPA Monitoring

The SSC was presented with an update on the early expiry of Commercial Product Assurance (CPA) Certificates. The SSC noted that SECAS has requested CPA Remedial Plans to be provided by Suppliers by 1 October 2021.

CPA-Related Issues

The SSC Chair and BEIS presented an update on ongoing discussions with NCSC regarding CPA-related issues, and the SSC noted the latest updates from the SSC CPA Issue Resolution Sub-Group (SCIRS) on Monday 13 September 2021, noting that the next meeting will be held on Monday 11 October 2021. The SSC also noted the late responses from the Request for Information on Use Case 004. The SSC also approved a request from the Energy Utilities Alliance (EUA) for an extension to the deadline for comments on CPA Security Characteristics v1.4 and agreed to publish the results of the recent SSC Survey relating to CPA and NCSC.

SMETS1 Update

The SSC noted DCC updates regarding the different aspects of SMETS1 enrolment including the Migration Summary; active and monthly dormant Migration process; and MOC Secure remediation.

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Anomaly Detection Report

The DCC presented the latest Anomaly Detection Report, and the SSC noted the report and provided feedback to the DCC.

Post-Commissioning Report

The DCC presented the latest Post-Commissioning Report for August 2021, and the SSC noted the report.

ECoS Risk Assessment and ADTs

The DCC presented the Enduring Change of Supplier (ECoS) Risk Assessment and an update on ECoS Anomaly Detection Thresholds (ADTs). The SSC noted the risk assessment and provided feedback to the DCC, requesting further details of security controls.

Scope for DCC CIO ECoS Assessment

The DCC presented the proposed scope for the DCC CIO Enduring Change of Supplier (ECoS) assessment, and the SSC approved the proposed scope.

Network Evolution

The DCC presented an update on new functionality on Comms Hubs and Networks as part of Network Evolution. The DCC also presented an update on the proposed Network Evolution Test Automation Framework. The SSC noted the updates and provided feedback to the DCC regarding the security of the DCC proposals.

SSC Risk Assessment

The SSC Chair presented proposals regarding the SSC Risk Assessment, and the SSC discussed potential options on the methodology to be used going forward.

Critical Firmware Update Paths

The SSC noted an update from the Shared Resource Provider Representative on critical firmware update paths and the SSC provided feedback on mitigating security controls.

DP179 'DCC Boxed'

SECAS presented an update on DP179 'DCC Boxed', and the SSC provided advice on the security of the DCC proposals.

CPA Installing Firmware

The SSC Chair presented an update on ongoing discussions with NCSC regarding the installation of existing firmware on new hardware.

DCC Independent Assurance Arrangements 2021 Scope

The DCC CIO presented the scope for the DCC Independent Assurance Arrangements in 2021. The SSC provided feedback on the scope and noted that the Security Controls Framework is currently being drafted.

DSP Technical Refresh Risk Assessment

The SSC noted that the DCC commissioned a review of the risk assessment for the DSP Technical Refresh as required by Section 2A.2 of Schedule 5 of the Smart Meter Communication Licence and noted no objections to the approach, scope and findings of the DSP technical refresh risk assessment.

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3.4   SMKI PMA Highlights

TSP Updated Plan

The DCC provided an update on the plan to re-platform the Trusted Service Provider (TSP) including timelines for testing.

SMKI Recovery Key Guidance

The Chair provided the SMKI PMA with an update on amendments to the SMKI Recovery Key Guidance to allow the use of SMKI Recovery Procedures to remove incorrect Gas Network Operator Organisation Certificates and to replace them with ACB Certificates. The SMKI PMA noted the views of respondents to the consultation which closed on 17 August, and approved the proposed amendments and the publication of the SMKI Recovery Procedures Version 1.3.

MP128 'Gas Network Operators SMKI Requirements'

The SMKI PMA requested that SECAS splits MP128 'Gas Network Operators SMKI Requirements' into two parts to implement the Legal Text to allow Suppliers to place ACB Certificates onto Devices in the place of Gas Network SMKI Organisation Certificates as soon as practically possible. This is so the issue of incorrect Gas Network Operator Organisation Certificates on Devices can be promptly rectified.

Resolving Incorrect Network Operator Certificates

The DCC provided the SMKI PMA with an update on resolving the incorrect Gas Network Operator Certificates, including a proposed plan of actions and dependencies when running Recovery. The SMKI PMA held an extraordinary meeting on 24 September 2021 where the details of the SMKI Recovery Event required to resolve the incorrect Gas Network Operator Certificates were discussed.

SMKI Recovery Testing & Future Testing Scenarios

The SMKI PMA noted DCC updates on the outstanding defects from Phase 2 of SMKI Recovery testing in 2020.

SMETS1 Symmetric Keys

The DCC provided an update on SMETS1 Symmetric Keys and advised that the Certificate Policy document, as previously approved by the SMKI PMA, will be released for industry Consultation in September 2021.

Supplier of Last Resort

The SMKI PMA authorised the DCC to revoke the SMKI Organisation Certificates for four energy Suppliers who had ceased to trade having first ensured that no prepayment consumers would be adversely affected. The revocations were for MoneyPlus Energy; PfP Energy; Utility Point Energy; and Peoples Energy.

4.   SMDA Sub Committee

The SMDA Sub-Committee (SMDASC) met on Monday 20 September 2021. Key topics discussed included:

November 20 and November 21 Release

Implementation of November 20 Release is expected within three months. An impact assessment will be presented at the next SMDASC meeting for the November 21 Release.

WNC Comms Hub

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Concerns were raised at the Management Panel Sub-Group (MPSG) that splitting testing between WNC and TEF Communication Hubs (CH) would not provide sufficient testing confidence as the two CH, while supposed to behave the same, behave differently in the live environment. A pilot programme to test the differences between WNC and TEF Comms Hubs will be proposed to the SMDASC. Depending on the outcomes of the pilot programme, testing scenarios can then be developed to include any additional tests required to ensure sufficient testing on the two Comms Hubs.

Dual Band Comms Hubs

The Test House (TH) has the capacity to test devices on a Dual Band Comms Hub. Further investigation is required on the process and level of testing required to uplift a device from Single Band Comms Hub (SBCH) testing to Dual Band Comms Hub (DBCH) testing. The SMDASC highlighted that there could be impacts on testing with DBCH as changes have been made to the underlying chipsets, radio stacks and low frequency Service Requests. The Scheme Operator will also confirm the Zigbee requirements for DB GSME meters that switch frequencies in the live environment.

Full Assurance

Full Assurance is expected by the end of 2021 based on device Firmware submissions by manufacturers. A Full Assurance baseline will be created which will be updated once a SMDA Common Tolerable Issue (an issue outside of the device manufactures scope to resolve) has been solved.

Scheme Membership

An impact assessment was provided by SECAS on the impacts of aligning SMDA Membership with SEC Parties. The SMDASC discussed the potential for non-SEC Parties to gain access via an administration fee of £2,250 (the previous cost of SMDA membership). Clarification was required about whether access via the administration fee is only applicable to current SMDA members or any new organisation. One SMDA member is not a SEC Party and will be contacted following confirmation.

SMDA Scheme Scope Review Consultation

The consultation deadline for the SMDA Scheme Scope Review was 1 October 2021. 18 responses were received. The consultation included the below four questions:

- Q1. Do you support the suggested changes to the scope of SMDA testing proposed by Network Operators?
- Q2. Do you support the proposal for SMDA pre-User Integration Testing (UIT) DCC Communications Hubs testing?
- Q3. Would add-on, party specific testing services provided by the SMDA Test House be of interest?
- Q4. Would you like to see any other changes to the scope of the Smart Meter Device Assurance (SMDA) Scheme?

Following an initial review, changes to the SMDA Scope proposed by DNOs were supported along with SMDA pre-User Integration Testing (UIT) DCC CH testing. A third of respondents did not provide any comments on additional Party-specific testing, and from the comments that were received, it appears there was a lack of interest in the industry.

Finally, there was the opportunity to suggest any further changes to the Scheme's scope and the following where highlighted:

- Under a Load testing
- Voltage alert testing
- Tariff Variation testing
- Spurious power outage alert testing

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- Soak testing
- HAN devices testing
- DCC Other User testing
- DUIS Adapter providers – E2E interoperability
- Security credentials and key rotations

A more detailed report will be circulated to the SMDASC.

5.   Recommendations

The Panel is requested to:

- **NOTE** the contents of this paper; and

- **ENDORSE** the concerns raised by the Sub-Committees.

Cecily Bain
SECAS Team
8 October 2021

Attachments:
- **Appendix A:** User Security Assessments – Identified Non-Compliances (**RED**)