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SEC Change Sub-Committee Meeting 31_2809

28 September 2021, 10:00 – 12:00

Teleconference

SECCSC_31_2809 – Draft Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	David Kemp (DK)
Large Suppliers	Sarah-Jane Russell (S-JR)
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
	Chris Brown (CB)
Electricity Network Parties	Gemma Slaney (GS)
Other SEC Parties	Alastair Cobb (AC)

Representing	Other Participants
SMKI PMA Chair	Gordon Hextall (GH) <i>(part items 1-3)</i>
Proposer of DP184	Mark Hamilton (MH) <i>(part item 3)</i>
Proposer of DP163	Rochelle Harrison (RH) <i>(part item 3)</i>
Proposer of DP177 & DP182	Eric Taylor (ET) <i>(part item 3)</i>
Proposer of DP181	Lynne Hargrave (LH) <i>(part item 3)</i>
SECAS	Holly Burton (HB) <i>(Meeting Secretary)</i>
	Ali Beard (AB)
	Joe Hehir (JH)
	Mike Fenn (MF)
	Khaleda Hussain (KH)
	Michelle Awosoga (MA)

Apologies:

Representing	CSC Member
Consumers	Ed Rees (ER)
SECAS	Kev Duddy (KD)
DCC	David Walsh (DW)
	Remi Oluwabamise (RO)

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 31 August 2021. The CSC **APPROVED** the minutes as written.

2. Actions Outstanding

Action Reference	Action
30/01	<p>SECAS (KH)/(AC) to reach out to Trade Associations (EUA & BEAMA) in order to better involve manufacturers as part of the SEC modifications process.</p> <p>It was advised that SECAS will be holding a discussion with EUA and BEAMA at a meeting on Tuesday 5 October 2021. The CSC will be updated on outcomes at the next month's CSC meeting in October 2021.</p> <p>A member (AC) requested SECAS to reach out to the host of the EUA and BEAMA meeting in order to extend the invite to them to attend and advise on discussions.</p> <p>Status: Open</p>
30/02	<p>SECAS (JH) to seek 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.</p> <p>It was advised that SECAS has agreed that CSC should monitor progress against a new action for DCC to seek feedback on the Communications Hub Firmware Management Overview document, to ensure the document accurately reflects Industry expectations, whilst ensuring the document is adequately updated on a regular basis.</p> <p>Status: Closed</p>
30/03	<p>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.</p> <p>It was advised that SECAS will prepare a paper for the October 2021 CSC meeting.</p>

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Action Reference	Action
Status: Open	

CSC31/01: DCC to seek feedback on the Communications Hub Firmware Management Overview document, to ensure it meets industry expectations and report back to the CSC at a future meeting.

3. SEC Modification Progression

MP128B 'Incorrect Gas Network Operator Certificates'

The CSC was provided with a summary of Modification Proposal [MP128B 'Incorrect Gas Network Operator Certificates'](#).

In discussion with the SMKI PMA Chair (GH), there was an urge to bring forward the implementation date to one Working Day after decision as opposed to the February 2022 SEC Release as stated in the Modification Report. The rationale for this is that meters with incorrect Certificates continue to increase in numbers as Suppliers are required to put a Certificate on the meter. The guidance by the Energy Network Association (ENA) indicates for Cadent meters the National Grid Certificate should be used (as Cadent are not SMKI Subscribers). This modification was split into two-parts, with MP128B implementing a simple legal text change to allow Gas Network Parties the option to become SMKI Users as well as ensuring Suppliers are able to put ACB Certificates onto a Device and therefore stopping the increasing numbers of incorrect Certificates.

The SMKI PMA Chair (GH) highlighted the SMKI Recovery key Guidance was consulted upon in August 2021. A SMKI Key Recovery Event has now been scheduled for November 2021. Currently there are over two million Devices that hold National Grid Certificates which have been incorrectly added. Instead Cadent Gas Certificates should be uploaded to the Device, therefore there is a strong desire to stop adding the wrong Certificates as soon as possible.

There will be a communication from the SMKI-PMA to industry around the Recovery exercise taking place in November 2021, whilst informing Suppliers that ACB Certificates should be added once this modification is implemented.

The ENA currently has not been contacted regarding its guidance as there is no alternative Certificate to use until this modification is implemented. The ENA is aware that all Certificates will need to be replaced with ACB Certificates and is also aware of the guidance change that needs to take place.

The SMKI PMA Chair (GH) clarified Suppliers will not need to correct the situation as the Recovery exercise scheduled for November 2021 will look to resolve incorrect certificates against over one million Devices. [MP128A 'Gas Network Operator SMKI Requirements'](#) will look to fix incorrect Certificates moving forward.

The CSC:

- **AGREED** that MP128B should be progressed to the Report Phase
- **APPROVED** the Modification Report subject to further clarity around the ENA guidance and Recovery exercise being added

- **APPROVED** the implementation approach
- **AGREED** that MP128B should be progressed as a Self-Governance Modification

DP177 'Replacement of CPA Evaluation Assurance and Certification Provider'

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

The Proposer (ET) informed the CSC that anyone who makes a Device and works on the Network has suffered from this issue. They believe that the SSC has broad coverage, however, is denied the ability to fix any problems. The matters are determined by BEIS and the NCSC with SSC being held as an administrator who can only make small changes. The Proposer believes that the real problem is the current system in place as this does not represent Users and their views. The SSC has made some progress by setting up the SSC Commercial Product Assurance Issue Resolution Sub-Group (SCIRS). This group will facilitate the CPA evaluation process by providing a working level forum through which the SSC, BEIS and the NCSC can work together with key industry partners to review issues arising from CPA evaluations. It will seek to reach a consensus where possible on the application of security controls and the interpretation and implementation of the CPA Security Characteristics and any associated Guidance.

The Proposer (ET) noted there is a need for a change resulting in this modification being progressed. The Working Group should look to determine what is needed from this change as the failure has been consistent throughout SMETS2.

The CSC had no comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP177 should be converted to a Modification Proposal
- **AGREED** that MP177 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP177

DP152 'Consumption on Smart Polyphase Electricity Meters'

The CSC was provided with a summary of Draft Proposal [DP152 'Consumption on Smart Polyphase Electricity Meters'](#).

A member (CB) suggested there is some functionality of measurement of separate loads missing around Polyphase Meters and that Electric Vehicles (EVs) are becoming more prevalent which would use this technology. There was a question around whether three phase metering will help Smart metering become more future proof.

SECAS (MF) informed the CSC that a request for information (RFI) had been requested which saw a unanimous response from Parties that there was benefit in progressing this modification. Although not all Parties could quantify the benefits, all Parties were supportive of this modification.

The CSC had no further comments.

The CSC:

- **AGREED** the issue and impact it is having is clearly defined and understood
- **AGREED** that DP152 should be converted to a Modification Proposal
- **AGREED** that MP152 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP152

DP184 'Increase Smart Capability of SMETS2 Twin Element ESME to support Solar and Storage use cases'

The CSC was provided with a summary of new Draft Proposal [DP184 'Increase Smart Capability of SMETS2 Twin Element ESME to support Solar and Storage use cases'](#).

The CSC was informed that SECAS believes this modification should progress alongside [DP152 'Consumption on Smart Polyphase Electricity Meters'](#) and several Parties have expressed interest in the topic. The Proposer (MH) highlighted this modification would see development of finance products for the domestic market where a system will be offered at no upfront cost to the customer.

A member (EL) suggested the issue described is not reflective for what a Twin Element ESME does and that the requirement needs rewording. A Twin Element is a meter that allows for two sets of energy to be recorded and used at the same time e.g. Water and Heating. There are also differences in the use cases, and a pre-payment solution is needed in the Industry given the retail price increase.

A member (GS) questioned that as this modification works in parallel with MP152, would the delay of this modification potentially hold up MP152. SECAS (AB) confirmed that the issue for DP152 is clear and can therefore proceed to the Refinement Process. Any work carried out on MP152 in the interim will be done with DP184 in mind. DP184 was recommended to remain in development stage until further clarity on the issue and Use Case is provided. The proposer (MH) advised he will share further details with SECAS which can be incorporated into the Draft Proposal to reflect the issue more accurately.

The CSC:

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

DP163 'T3 Aerials Requirements Removal'

The CSC was provided with a summary of new Draft Proposal [DP163 'T3 Aerials Requirements Removal'](#).

The Proposer (RH) informed the CSC that the DCC recently consulted upon this around one year ago which resulted in three options. Most if not all respondents preferred option two which saw Telefonica organically increasing the Wide Area Network (WAN) coverage to 99.5%.

A member (EL) responded there is currently a BEIS trial to test the technology of T3 aerials. Over many years the requirement has been challenged. T3 aerials seem to be favoured in far more instances than the Industry had envisaged, and the process to get a T3 aerial installation booked, arranged and installed has been driven mostly by DCC Service Providers and is not aligned to Suppliers' preferences, DCC Users or Customers.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP163 should be converted to a Modification Proposal

- **AGREED** that MP163 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP163

DP168 'CPL Security Improvements'

The CSC was provided with a summary of new Draft Proposal [DP168 'CPL Security Improvements'](#).

The CSC had no comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP168 should be converted to a Modification Proposal
- **AGREED** that MP168 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP168

DP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'

The CSC was provided with a summary of new Draft Proposal [DP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#).

A member (GS) noted the modification mentions possible changes to the D0350 flow and questioned if this modification should be presented to the Cross-Code Steering Group (CCSG) to make sure everything aligns. It also mentions Service Requests 8.4 and 8.6 which were the opt-in/opt-out. This was queried under [MP077 'DCC Service Flagging'](#) but was concluded this was to do with opting out of DCC Services which resulted in the original D0350 Service flags. This was challenged when the modification was progressed. This modification needs a lot of work as there will be scenarios where Consumers will refuse, and Suppliers cannot force consumers to have a smart meter. A proper solution needs to be put in place for managing these situations.

A member (CB) queried if the modification was seeking to set a flag or program the meter. The Proposer (EL) noted it seeks to enable a Supplier to do what was needed, and to flag the issues with not commissioning a Smart meter. They did not consider that these issues had been fully appreciated by BEIS. They also clarified there are multiple use cases under this modification, such as refusal at the point of install, or refusal following a change of Supplier or tenancy (CoS/CoT).

A member (GS) queried how much of the issue sat under the SEC, as the overarching question is on the right to refuse a smart meter. They believed this needed further work before being taken to the Working Group.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP169 should be converted to a Modification Proposal
- **AGREED** that MP169 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP169

DP178 'Removing DSP validation against the SMI join status for SR8.8.x'

The CSC was provided with a summary of new Draft Proposal [DP178 'Removing DSP validation against the SMI join status for SR8.8.x'](#).

The CSC had no comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP178 should be converted to a Modification Proposal
- **AGREED** that MP178 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP178

DP181 'Meter Asset Provider access to asset related data held by the DCC'

The CSC was provided with a summary of new Draft Proposal [DP181 'Meter Asset Provider access to asset related data held by the DCC'](#).

The Proposer (LH) noted a DCC consultation was issued at the end of 2020 with a closing date of January 2021 that requested DCC Users' views on confidentiality. The consultation responses have not yet been published. SECAS is engaging with the DCC in order to help understand the views of DCC Users. With regards to the data set requested, this is regarded as purely asset-related data and does not relate to Supplier or consumer data.

A member (EL) showed support for this modification, however questioned how a MAP or a Party would prove that the data being requested is theirs. The Proposer stated that it is the intention to provide Global Unique Identifiers (GUIDs) to the DCC as proof of ownership of the asset.

The CSC had no further comments.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP181 should be converted to a Modification Proposal
- **AGREED** that MP181 should proceed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP181

DP182 'Improving Transparency of Election Results'

The CSC was provided with a summary of new Draft Proposal [DP182 'Improving Transparency of Election Results'](#).

The Proposer (ET) highlighted there is no overall objective that relates to Smart Metering and was surprised that the SEC does not currently publish results of elections. The results should be shared to maintain confidence within the Industry, there is no merit in being discreet.

A member (EL) was not aware of any other Code Administrator that is declared in this way.

SECAS (AB) suggested further work will be undertaken to see what approach is taken by other Code Administrators and Managers.

The CSC:

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

DP183 'Post Commissioning Obligations'

The CSC was provided with a summary of new Draft Proposal [DP183 'Post Commissioning Obligations'](#).

A member (GS) suggested to look at the accuracy of the data as post commissioning obligations reporting is based on the number of Service Requests and the SEC obligations are more specific. SECAS (MF) agreed this will be looked into as part of the modification.

The CSC:

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

4. SEC Modification Timetables

SECAS (AB) provided an update on the timetables for Modification Proposals currently in the Refinement Process and the next main programme of work for each open modification.

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 there is no change to the scope of the November 2021 SEC Release, and SECAS does not expect any further modifications to be added to the scope of this release. On 29 September 2021, the Testing Advisory Group (TAG) will be reviewing DCC's readiness for the Release of acceptance criteria with the OPSG following the same review on Tuesday 5 October 2021.

SECAS will return to the October 2021 CSC meeting to seek approval for the November 2021 SEC Release to go-live whilst taking into consideration the views of the TAG and OPSG against the acceptance criteria.

As part of the February 2022 SEC Release, MP128B was included in the scope of this release. However, the Proposer has recommended, and the CSC earlier agreed this should be implemented one Working Day following decision. Therefore, MP128B is no longer in the scope for the February 2022 SEC Release.

[MP154 'CH Returns SLA Amendment'](#) should be removed from the scope of the February 2022 SEC Release. This is due to the Preliminary Assessment confirming the estimated implementation timescales as well as it being DCC System impacting.

The scope for the June 2022 SEC Release remains unchanged. All the DCC System impacting modifications targeted for this release impact the DCC User Interface Specification (DUIS). This is due to the Enduring Change of Supplier (ECoS) programme, which is also targeted for June 2022, also impacting the DUIS. Therefore, for efficiency and minimal disruption to industry, SECAS is trying to align the two releases.

A provisional scope has been prepared for the November 2022 SEC Release, covering the impact on DCC systems. In October 2021, SECAS will seek TABASC feedback against the scope and in November 2021, the OPSG will be asked the same question before returning to the CSC with a request to baseline the scope of the November 2022 SEC Release.

The CSC:

- **AGREED** the update to the scope of the February 2022 SEC Release; and
- **NOTED** the updates on the 2021 and 2022 SEC Releases.

6. Any Other Business (AOB)

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

Next Meeting: 26 October 2021