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Paper Reference:	SECP_52_1201_02
Action:	For Decision

SEC Panel Risk and Issue Register Update

1. Purpose

This paper provides the monthly update on the SEC Panel Risk Register. It explains any proposed new risks or changes to existing risks and associated ratings. It also sets out any updates to the Panel Issues Register, and outlines further detail on the actions being taken to resolve or mitigate the issues.

The SEC Panel Risk Register and Issue Register are provided as Appendix A and B respectively.

The paper also highlights a concern raised by the Testing Advisory Group (TAG) in relation to the Smart Metering Equipment Technical Specifications (SMETS)1 Services release.

2. New Risk Update

As part of the December 2017 Panel discussion around Release 2.0 Testing Approach Documents, the Panel agreed that a new risk be developed for inclusion in the Panel Risk Register. The risk relates to the need for appropriate Communications Hub firmware regression testing to be undertaken during Release testing. The Panel's agreement to add this risk was driven by concerns that deployed devices, or Communications Hubs in storage, may become unusable following the deployment of a new system impacting release and associated firmware if an appropriate amount of regression testing was not undertaken.

The proposed risk, including the Impact, Severity, Mitigation and Red/Amber/Green (RAG) Status, is set out in Appendix A as Risk 14.

3. Testing Advisory Group Concern on the SMETS1 Release

At the December 2017 TAG meeting, discussions took place on the SMETS1 User Testing Service (UTS) Approach Document. The TAG discussed high level feedback that would inform subsequent revisions to it.

As per previous feedback on the SMETS1 Services SEC Variation Testing Approach Document (SVTAD), discussed at the December 2017 Panel meeting, the complete picture on the SMETS1 Services solution is still not known. This makes it difficult to formulate views on the appropriateness of the approach document for SMETS1 UTS. The TAG Members have specifically raised concerns that due to the unknowns around the SMETS1 Services, including the final solution, migration approach, interoperability and the continuation of services to SMETS1 devices once they migrated to the DCC, that the TAG should formally raise the concern with the Panel.

The TAG notes that the timing of the development of the SMETS1 UTS Approach Document by the DCC has been driven by the need to produce, consult with SEC Parties and finalise the document six months before the commencement of User Testing activities.

SECAS agreed to provide details of the concern to the Panel for its consideration at the January 2018 Panel meeting, in order to inform whether it should escalate the feedback to BEIS so that the timelines currently being worked to are appropriate and take due consideration of the impact on customers if the delivery of SMETS1 services is not managed carefully.

4. Summary of Changes to the Risk Register

There are no new amendments made to existing risks this month.

5. SEC Panel Risk Matrix

The matrix in Figure 1 shows the latest status of Panel risks.

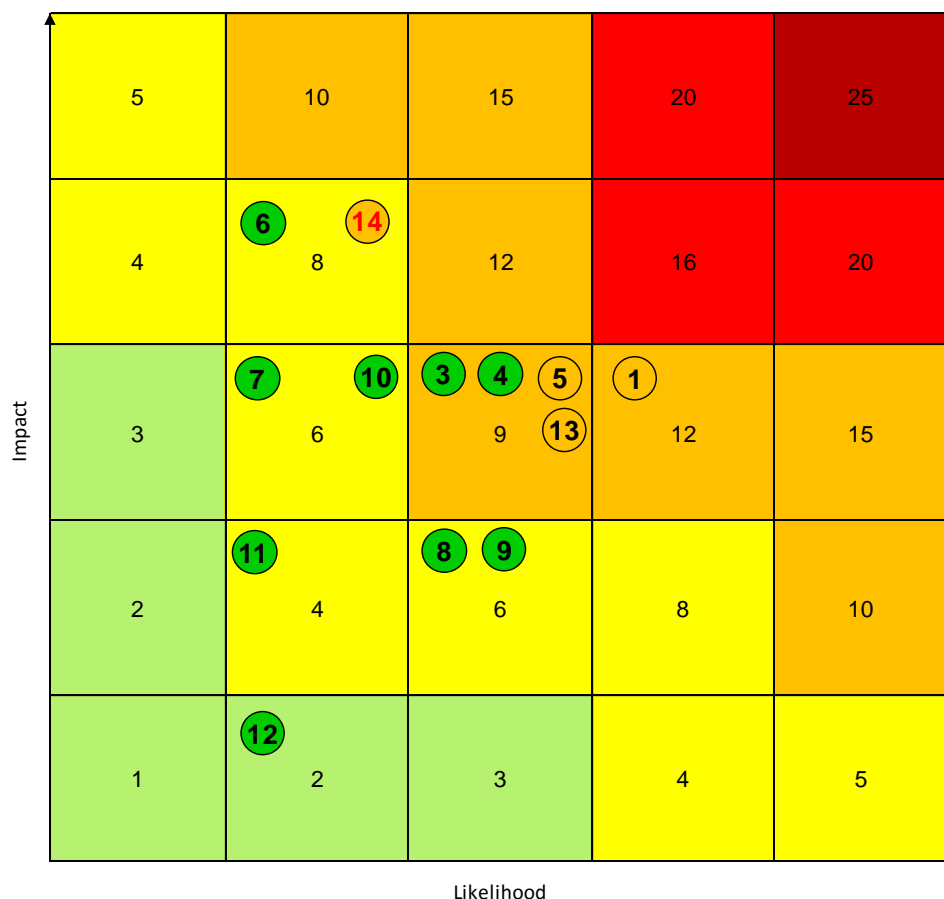


Figure 1: SEC Panel Risks Matrix

6. SEC Panel Issue(s)

There are no new SEC Panel Issues or amendments to the Issue Register this month.

7. Recommendations

The SEC Panel is requested to:

- **NOTE** the contents of this paper;
- **AGREE** whether to highlight the TAG concerns on the SMETS1 Services release to BEIS; and
- **AGREE** the amendments to the SEC Panel Risk Register.

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SECAS Team

5th January 2018

Appendix A - SEC Panel Risks

The following table lists the SEC Panel risks, reflecting any updates made as part of the monthly review. The risks have been ordered from highest to lowest Severity. Any mitigations or actions activities in *italics* are those that are ongoing, or require completion. Any mitigations or actions activities in **red** are those that are new.

#	There is a risk that...	Impact	Likelihood	Severity	Mitigation (Planned and/or ongoing actions in italics)	RAG Status
		(1-5)	(1-5)			
1	The DCC are unable to deliver all the changes that make up the content of a Release, leading to potential descoping of content or delays to Release timescales.	3	4	12	<ul style="list-style-type: none"> • SEC Panel and the DCC have developed a Release Management Document to cover the overarching approach to managing releases, which was issued for consultation on 15th November 2017. • DCC to regularly update the Panel on progression of the release implementation. 	AMBER
3	Confidential information is leaked due to inadequate security controls leading to reputational damage and potential legal challenge.	3	3	9	<ul style="list-style-type: none"> • The Panel Information Policy is in place to control access to confidential information in accordance with the SEC. • Terms of Reference (ToR) for each Sub-Committee require all members to sign a confidentiality and non-disclosure agreement. • Internal SECAS processes for handling of confidential data, including the use of Egress to store and distribute data. 	GREEN
4	Testing may be insufficient for a stable environment leading to defects.	3	3	9	<ul style="list-style-type: none"> • The Testing Advisory Group (TAG) analyse and review outcomes and reports through the weekly testing updates and calls. • DCC Live Service Criteria Report to BEIS in place. • Defect Resolution Process and Issue Resolution Processing in place in relation to Modifications. 	GREEN

#	There is a risk that...	Impact	Likelihood	Severity	Mitigation (Planned and/or ongoing actions in italics)	RAG Status
		(1-5)	(1-5)			
					<ul style="list-style-type: none"> Obligations in place under User E2E testing. 	
5	Release Management is inefficient due to the dual input by BEIS and the SEC Panel in relation to Release content and implementation.	3	3	9	<ul style="list-style-type: none"> Initiated early handover of Technical Specifications to align Modifications in Releases. <i>Development of the enduring Release Management documentations (ongoing).</i> SECAS continue to attend the Implementation Managers Forum (IMF) and Technical and Business Design Group (TBDG) for BEIS updates on Release Management planning. 	AMBER
13	Wider industry initiatives that have impacts on the smart metering arrangements take into account the current requirements (e.g. the switch to half-hourly settlement and the faster switching programme and changes to Feed in Tariffs).	3	3	9	<ul style="list-style-type: none"> <i>Establish regular reporting and information exchange between the Faster Switching teams to ensure impacts are captured and considered.</i> <i>Sub-Committees (such as the TABASC and the Ops Group) to highlight any industry wide projects that may require SEC input.</i> <i>Updates to be provided to the Panel or (relevant Sub-Committee) on new industry initiatives to be requested from leading body</i> <i>Assumptions made by the leading body are checked and challenged (if required) by the Panel or relevant Sub-Committee.</i> 	AMBER
14	Insufficient Communications Hub firmware regression testing to be undertaken during Release testing, resulting in	4	2	8	<ul style="list-style-type: none"> <i>DCC undertakes appropriate levels of Communication Hub regression testing to provide assurance that devices continue to work once a release goes live</i> 	AMBER

#	There is a risk that...	Impact	Likelihood	Severity	Mitigation (Planned and/or ongoing actions in italics)	RAG Status
		(1-5)	(1-5)			
	deployed devices and/or Communications Hubs in storage not working once a release goes live.				<ul style="list-style-type: none"> • Evidence of the regression testing is provided and reviewed by the TAG and Panel. • Panel highlights Communications Hub regression testing concerns to BEIS, as part of its considerations of Release 2.0 (System Integration Testing) Approach Documentation. • DCC provides extra details on the extent of regression testing within the Release 2.0 (System Integration Testing) Approach Documentation. 	
6	Incorrect implementation of process or tooling defects lead to errors being introduced into the draft Technical Specifications and Great Britain Companion Specification (GBCS).	4	2	8	<ul style="list-style-type: none"> • A Quality Assurance process is in place. • SECAS has a defined process including resourcing. • SECAS has a community of technical experts for content reviews. 	GREEN
7	The expert support structure established by the Technical Architecture and Business Architecture Sub-Committee (TABASC) is not adequate for supporting them in its duties, due to knowledge gaps or there not being availability within industry.	3	2	6	<ul style="list-style-type: none"> • The Technical and Business Expert Community (TBEC) is established. • Agreed approach for expert resource to be managed on a work package level. • Directly seek out technical experts if required by future work packages. 	GREEN

#	There is a risk that...	Impact	Likelihood	Severity	Mitigation (Planned and/or ongoing actions in italics)	RAG Status
		(1-5)	(1-5)			
8	The Panel guidance and timescales cannot support DCC Users in meeting their licence obligations in relation to User Mandates.	2	3	6	<ul style="list-style-type: none"> Completed updates to the User Entry Process guidance on SEC Website. Provide Party Support by communicating with all Small Suppliers. Joint DCC engagement with DCC Users to ensure alignment. The SEC Panel have delegated the responsibility of setting the assurance statuses to the SSC, which therefore, supports quicker timescales for the assessment process. 	GREEN
9	A Modification Proposal is progressed that has a negative impact on the End-to-End Technical Architecture.	2	3	6	<ul style="list-style-type: none"> The TABASC to feed into Modifications Process with any feedback and impact assessment required (ongoing). The TABASC are provided with a monthly Modification development update. TBEC established for the TABASC to call on if required to provide expert input into the Modifications Process. 	GREEN
10	SEC Panel Budget is insufficient due to unexpected resource needs (e.g. high volume of Modification Proposals or additional unexpected Panel responsibilities taking effect).	3	2	6	<ul style="list-style-type: none"> Updated Jointed Implementation Plan (JIP) reviewed to identify any impacts to SEC Panel. SEC Panel Budget reflects DCC re-plan outcomes. SEC Panel Budget for Regulatory Year 2017-2018 approved and finalised. SEC Panel Budget for Regulatory Year 2018-2019 is currently being drafted based on a number of assumptions with contingency provisions available for any overspend. 	GREEN

#	There is a risk that...	Impact	Likelihood	Severity	Mitigation (Planned and/or ongoing actions in italics)	RAG Status
		(1-5)	(1-5)			
11	Inability to fulfil SEC activities across all SEC Panel Sub-Committees due to unclear requirements or timings.	2	2	4	<ul style="list-style-type: none"> • Duties set out and monitored monthly by each Sub-Committees' Activity Planners. • Utilise available resources such as the TBEC and SECAS technical experts. • The SSC utilise security experts. • The TABASC utilise work packages to determine a development approach and estimated resource required for each new piece of work. • The SMKI PMA utilise specialists available. • Seek Panel's advice if duties are unclear in the Terms of Reference. 	GREEN
12	There is insufficient interaction between the SEC Panel and Alt HAN Forum to enable alignment of SEC Objectives.	1	2	2	<ul style="list-style-type: none"> • Establish regular reporting and information exchange between the SEC Panel and Alt HAN Forum Chairs. • Alt HAN Forum provided input to the SEC End of Regulatory Year Report. 	GREEN

Table 1: SEC Panel Risks

Appendix B - SEC Panel Issue Register

The following table lists the SEC Panel issues, reflecting any new or updated issues made as part of the monthly review. Any mitigations or actions activities in *italics* are those that are ongoing, or require completion. Any mitigations or actions activities in **red** are those that are new.

Issue No.	Date Raised	Issue Category	Associated Risk No.	There is an Issue that...	The Impacts of the Issues are...	Impact (1-5)	Mitigation and Actions Required (Planned actions in italics)	RAG Status
1	14 th July 2017	Modification Process	2 ¹	the progression of Modification Proposals are not meeting required timescales due to the delayed completion of activities (e.g. submission of Impact Assessments and any requested information within reasonable timescales from the DCC) leading to reputational damage and challenge.	that industry driven Modification Proposals are not being progressed in a timely manner resulting in: <ul style="list-style-type: none"> diminished case for the change, as the benefits against the SEC Objectives are potentially reduced; frustration with the SEC Modification Process; and/or frustration that Industry driven change is not a priority compared with other changes. 	3	<ul style="list-style-type: none"> Panel is monitoring progression against agreed timescales through monthly Modification updates and is reviewing changes when necessary. Panel has requested commitment and confirmation from the DCC that timescales (including revised timescales) for the completion of Preliminary Assessments and Impact Assessments will be achieved and will not slip (further). <i>SECMP0034 – ‘Changes to the SEC Section D for DCC analysis provisions’ which is in the Modification Process that seeks to recognise within the SEC the DCC’s Preliminary Assessment (PA) and Impact Assessment (IA) processes to ensure there are clear delivery timescales and/or methods for setting such timescales.</i> Plan resourcing, manage expectations and extent of involvement to deliver obligations are reviewed and reflected in the SEC Panel Budget. DCC to confirm that the timescales they indicate for the provisions. 	AMBER

Table 1: SEC Panel Issue Register

¹ The progression of Modifications Proposals does not meet required timescales due to the delayed completion of activities (e.g. submission of Impact Assessments and any requested information within reasonable timescales) leading to reputational damage and challenge by SEC Parties and/or Ofgem.

Appendix C - SEC Panel Risk and Issue Impact Classification

Category	Negligible (1)	Minor (2)	Moderate (3)	Serious (4)	Major (5)
Safety	Minor or no medical treatment required, no lost time.	Medical treatment, less than 3 days' impact.	Reportable injury with impact greater than 3 days.	Major long term but reversible injury.	Single fatality or serious irreversible disability with major quality of life impact.
Environment	Contained environmental release with no adverse effects.	Short term, minor environmental impact confined to site.	Moderate short term impact on biological or physical environment.	Environmental impact causing serious but reversible environmental impact on biological or physical environment.	Major environmental impact causing long-term or irreversible change in localised biological or physical environment with loss of habitat/species.
Reputation	Isolated complaint or comment with no anticipated coverage.	Limited local public and media concern with 'short lived' local coverage.	Extensive regional public and media concern with potential to escalate to national coverage.	Sustained regional public and media concern with limited national coverage impacting business in UK.	Sustained public and media criticism impacting smart metering or business in UK.
Client & Customer	Limited short-term impact on client base and satisfaction.	Short-term impact on client base and satisfaction.	Significant short-term impact on client base and satisfaction.	Significant impact on client base and satisfaction requiring some change to company strategy.	Significant long-term impact on client base and satisfaction requiring significant change to company strategy.
Asset	Minimal asset damage, affecting operations for less than 48 hours.	Minor asset damage which impacts operations for < 30 days.	Moderate asset damage which impacts operations for between 30 days and six months.	Serious asset damage which impacts operations for more than 6 months.	Total loss of single asset (or group of interdependent assets).

Category	Negligible (1)	Minor (2)	Moderate (3)	Serious (4)	Major (5)
Legal & Regulatory	Breach of internal controls, limited impact.	Low level legal issue, quickly resolved. Breach of internal control.	Moderate legal issue, non-compliance or breach of regulation, increased scrutiny by authorities. Multiple breach of internal controls.	Significant breach, or latest in a series of breaches, involving investigation or report to authorities with prosecution or moderate fine possible.	Major legal/regulatory breach resulting in litigation, regulatory sanction and/or significant fine.
Financial Impact	One off revenue impact < £50k. Recurring, annual revenue impact < £10k.	One off revenue impact: £50k to £250k. Recurring, annual revenue impact < £50k.	One off revenue impact: £250k to £500k. Recurring, annual revenue impact < £100k.	One off revenue impact: £500k - £1m. Recurring, annual revenue impact < £250k.	One off revenue impact > £1m. Recurring, annual revenue impact > £250k.
People	Minimal staff loss or shortfalls in recruitment. Key Staff / Team not available for a week.	<10% loss or recruitment of a team. Key Staff / Team not available for up to one month.	Between 10% - 50% loss or recruitment of a team. Key Staff /Team not available for between one to three months.	>50% loss or recruitment of a team. Key Staff / Team not available for between three to six months.	100% loss of or unable to recruit a team. Key Staff / Team not available for more than six months.
Security	Temporary closure (less than a day) or reduced operation of a Site or Asset.	Temporary closure (more than a day) of a Site or Asset.	Temporary closure (more than a week) of a Site or Asset.	Long term (more than a month) closure of a Site or Asset.	
Strategic	Impacts short-term tactical objectives.	Strategic objectives are delayed or require additional resource to deliver.	A strategic objective is not delivered or a key strategic assumption is overturned.	Multiple strategic objectives are not delivered or multiple key strategic assumptions are overturned.	Incident response prevents strategic roles being delivered, or demands complete change of strategy.