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MP181

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

Modification Report

Version 0.5

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Corporate member of
Plain English Campaign
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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has three annexes:

- **Annex A** contains the business requirements for the solution.
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex C** contains the full Data Communications Company (DCC) Preliminary Assessment response.

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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) and Device Manufacturers wish to access smart asset-related data held by the DCC. This will allow the MAP and Manufacturer to assess and manage asset health for any smart assets it owns or has manufactured. This will enable MAPs to work with Manufacturers to manage their asset portfolios effectively and efficiently, leading to reduced volumes of faulty Devices due to out of date firmware or failed Device commissioning.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 SEC, the inventory data requested by MAPs and Manufacturers 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.

Initially, the Proposed Solution only allowed MAPs to access the dataset. However, following the request of Device Manufacturers, the scope of this proposal will now allow Device Manufacturers to have access to the same dataset, provided that they are the Manufacturer of the asset.

This modification is a text only change, with DCC development costs being incorporated into the charge that MAPs and Manufacturers will be subject to in order to use the service. This modification will impact the DCC, Device Manufacturers and MAPs. Implementation is targeted for November 2022. This is a Self-Governance Modification.

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.

During the Development Stage, the DCC stated that 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 and meter Manufacturers 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 or have built. The data items that they wish to access are:

- Global Unique Identifier (GUID)
- Device type, manufacturer and model
- Device firmware version
- Device status
- Communication Service Provider (CSP) region
- Supplier ID (this has been added following the request of meter Manufacturers)

- Communications Hub make, model and firmware version (this has been added following the request of the Energy and Utilities Alliance (EUA))

The asset related data required by MAPs and meter Manufacturers 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. Also requested is Supplier ID data which will enable MAPs and Manufacturers to be able to contact the Responsible Supplier and work with that Supplier where a problem is identified with the firmware or commissioning of a Device.

What is the impact this is having?

MAPs and Manufacturers are currently unable to access DCC held data relating to the assets that they own (MAPs) or that they built (Manufacturers). This limits their 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 and Manufacturers 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 and Manufacturers 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. Solution

Proposed Solution

SEC legal text

This modification will implement a new Explicit Charging Metric that will be used by the MAPs and Manufacturers who wish to receive reports on the Devices they either own or have manufactured containing the agreed datasets. The actual mechanism for creating and delivering the reports will be developed by the DCC outside of the modification.

Providing the reports

Please note that this is for information only, as the DCC will develop this mechanism outside of this modification.

In order to facilitate the Proposer's request, the DCC will provide a service that will disclose asset-related data to MAPs and Manufacturers that choose to use the service. This data may be requested on a regular basis such as monthly or quarterly, or also as an ad-hoc request, at the discretion of the Party. In order to use the service to be provided by the DCC, the Party will have to pay an Explicit Charge.

In order for the DCC to determine that the MAP is the asset owner, the MAP will be requested to provide proof that they are the owner of the asset via SharePoint. The Proposer has advised that the most efficient way to provide the DCC with the required proof will be to upload a list of the GUIDs of the assets they are responsible for to the DCC SharePoint. The DCC shall then validate the GUIDs provided before disclosing the data. The DCC has stated that MAPs will need to ensure a single .csv file containing the GUIDs of Devices they are responsible for is uploaded to the DCC SharePoint in advance of when the report is to be produced. This file will be processed by DCC Technical Operations Centre (TOC).

This is not necessary for Manufacturers as the DCC will be able to refer to the Manufacturer ID located within the Central Products List (CPL) entry for the relevant Device model.

The DCC has advised that the data is readily available through the DCC TOC. The reports will be generated, and output as a single compressed zip file. This file will contain a single .csv file containing the required dataset. The zip file will be uploaded to the appropriate MAP or Meter Manufacturer's dedicated section of the existing DCC SharePoint location or through a Secure File Transfer Protocol (SFTP) on a fixed date of the month or fixed Working Day of the month to be agreed with the Party. The Party will also be notified via email that the report has been produced.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers		Flexibility Providers

This modification will impact MAPs and Device Manufacturers as they will be able to request the relevant report from the DCC in order to better understand the health of smart meters across the country. Please note that some MAPs also install meters.

The DCC will also be impacted as they will need to produce the reports at the TOC, and then bill the recipient through the Explicit Charge.

DCC System

The DCC has reviewed and concluded that the business requirements can be met in full and delivered using existing available data, although there will be a direct impact on support and maintenance.

The DCC has advised that if further changes to the requested dataset are identified, they will be separated out with individual DCC Change Requests sent to the relevant Service Providers.

The DCC has also stated that currently it does not have access to data to allow independent validation of whether a MAP owns a particular Device. However, the implementation of the Faster Switching programme may provide this data. To validate asset ownership, the DCC will check for duplicates on GUID lists provided by MAPs.

The full impacts on DCC systems and DCC's proposed testing approach can be found in the DCC Preliminary Assessment response in Annex B.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Section K 'Charging Methodology'

The changes to the SEC required to deliver the proposed solution can be found in Annex C.

Consumers

This modification will have a positive impact on consumers as the Proposed Solution will allow MAPs and Manufacturers to better understand the health of Devices installed at consumers' premises. Suppliers may then be informed of optimum Device / firmware combinations that will better serve the consumer.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

During Solution Development it was believed that the set-up costs would need to be paid for through the modification and a Preliminary Assessment was performed. However, once the DCC and the

Proposer agreed that the reports would be paid via an Explicit Charge, it was agreed that the set-up costs would initially be borne by the DCC and recouped gradually via the Explicit Charge. Therefore, there are no DCC costs directly associated with this modification as it will implement a new Explicit Charge.

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

Any SEC Party costs will be gathered through the Refinement Consultation.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **3 November 2022** (November 2022 SEC Release) if a decision to approve is received on or before 10 September 2022; or
- **23 February 2023** (February 2023 SEC Release) if a decision to approve is received after 10 September 2022 but on or before 1 December 2022.

The DCC has advised that it requires a three-month lead time to implement the required functionality at the TOC and set up the Explicit Charge in order to provide the service to Parties. The DCC added that it will commence building the mechanism once the modification has been approved (not after implementation).

7. Assessment of the proposal

Observations on the issue

During the Development Stage, SECAS asked the Proposer 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 Suppliers due to the volume of requests and responses that will 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.

Potential security concern

The Security Sub-Committee (SSC) Chair commented that, in theory, an individual could sign up to the SEC as an Other SEC Party and pay to use the DCC service to access the data which could be a potential security concern. The Proposer agreed 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 owner or that they built the asset. This was agreed by the Working Group. For MAPs, this will be through providing the DCC with a GUID list, similar to the process currently undertaken when requesting data from Xoserve. The DCC will be able to refer to the CPL to ensure that the correct Manufacturer has access to the reports.

Confidentiality

The Sub-Committee Chairs have 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 agreed that the data is not confidential but advised that the DCC believed otherwise. The SEC Lawyer confirmed that the data is not confidential if the DCC is carrying out 'permitted business'. The DCC has now agreed with this view.

Accessing the data

The Sub-Committee Chairs also advised that the service wouldn't necessarily be exclusive to MAPs due to 'Meter Asset Provider' not currently being a defined term within the SEC. The Proposer agreed that the legal text will detail that the data can only be disclosed to the asset owner or Manufacturer who built the asset.

Methods to obtain the data

During the Development Stage, SECAS advised that there may be multiple ways of accessing the data, such as using an Explicit Charge set out into the SEC or Elective Communication Service (ECS) (an ECS was discounted as this relates to a service that communicates with the Smart Metering Wide Area Network (SM WAN)). The Proposer is aware that there is also an opportunity to access the data through Other Users¹ via DCC and that some MAPs already use these services. The Proposer was concerned that the DCC could end this service due to DCC's previous perception that the data was confidential.

During the Development Stage, an Other User commented that if the data was obtained from the DCC, it could have a negative impact on their business model. The Proposer confirmed that they are

¹ Other Users are Users that are not an Import Supplier, Export Supplier, Gas Supplier, Electricity Distributor, Gas Transporter or Registered Supplier Agent.

aware that Other Users can provide asset related data and they currently utilise this service. They stated that if a commercial provider has developed a pay-for service that is more cost efficient than the DCC information, then MAPs are likely to use these third-party providers instead.

The Proposer has advised that 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 if 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.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair has also commented that the data can be obtained through a DCC TOC report as the data is already available. The Proposer advised that they have previously attempted to purchase the data from the DCC. However, the DCC previously believed that the data is confidential. Following clarification on the confidentiality issues, the Proposed Solution will utilise the TOC, and the subsequent reports will be made available through an Explicit Charge.

During Working Group discussions, a member commented that Manufacturers may already be able to access Supplier ID and effective from data as per the SEC Security Controls Framework Annex: Agreed Interpretations document. SECAS have investigated this, and the Supplier data can only be accessed by Device Manufacturers who have not signed up to the voluntary notification scheme with the SSC.

Solution development

The Proposer's initial solution

MAPs have requested that the DCC provide a 'pay-for' data service to MAPs and Manufacturers whereby the Parties 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.

Please note that the proposal was initially raised specifically for MAPs, and then during the Development Stage the scope of this proposal was widened allow Device Manufacturers to have access to asset related data. This resulted in the addition of the Supplier ID and effective from date, plus Communications Hub make, model and firmware version.

Building the solution

It has been agreed that the mechanism for providing the reports will sit outside of the SEC. This modification will be a legal text change to facilitate the disclosure of information. The DCC advises that the mechanism to provide the reports will take three months to develop, which will commence if and when the modification is approved. The anticipated build cost is approximately £12,000 which will be recouped through the charging mechanism. The cost of the reports will be reviewed every April after implementation. The DCC stated that if the modification is implemented in the November 2022 SEC Release, MAPs and Manufacturers will not be charged for the reports as they will validate the service. Charging for reports will commence in April 2023.

Who has access to the reports?

The Proposer and SECAS engaged with two meter Manufacturers to discuss the details of widening the scope to enable Manufacturers to access the same dataset as requested by MAPs.

The Manufacturers stated that gaining access to the dataset (provided they are the Manufacturer of the Device) will be beneficial as it would provide insight into the success of meter updates. They commented that there are approximately 69,000 Device model combinations. They added that accessing this data will allow Manufacturers to better understand the scale of the issue of out-of-date meters and firmware versions. The Manufacturers also advised that gaining access to Supplier IDs would increase the likelihood of them using the service.

Data set additions

The Manufacturers advised that it would be advantageous to know which Suppliers implement specific firmware versions as they will be able to address upgrade paths. This will be of benefit to the Suppliers as it will allow for better support of meters in the field and Manufacturers will be able to provide support to Suppliers with below optimum Device / firmware versions. The most efficient solution is by gaining access to the Supplier ID of the asset. Without the Supplier ID, Manufacturers would have to contact each MAP to understand who supplies each asset.

A meter Manufacturer also suggested widening the scope to allow data relating to Communications Hub firmware versions to be disclosed. This extra detail will enable MAPs and Manufacturers to further pinpoint issues on specific Device and firmware version combinations. They advised that there are approximately 60,000 Device / firmware version combinations currently in the field. Having access to this data will enable the Manufacturer to better understand the scale of an issue. The Proposer commented that this would be decided by the Working Group. They also commented that if any Party wished to expand the scope further, they would have to do so through a subsequent SEC Modification.

The Proposer also clarified to the Change Sub-Committee (CSC) that the data they wish to obtain is purely asset-related data and not Supplier or consumer data.

Devices subject to the reporting

During the Refinement Process, MP181 was discussed at a Joint Meter Manufacturer (JMM) meeting with members from the EUA and the British Electrotechnical and Allied Manufacturers' Association (BEAMA). The attendees were supportive of the modification and raised a few points for clarification.

It was asked whether the modification would disclose data for only installed and commissioned Devices or all Devices including those that are not installed but have been pre-notified by the Supplier. The Proposer has confirmed that this modification will apply to all Devices on the SMI and that the status field (from the data produced by the DCC) will inform the MAP or Manufacturer whether a Device has been installed and commissioned or decommissioned. They elaborated that the solution must include uncommissioned meters as part of the reason for requesting the data is so that MAPs can see when a Device isn't installed or isn't commissioned and then follow this up with the Supplier.

Data accuracy

SECAS informed the Working Group of the new proposed scope of the modification. Suppliers were generally supportive for Supplier ID and effective from dates to be made available through the Proposed Solution. However, they advised that the accuracy of the data produced by the DCC may be poor. A Working Group member added that the data they had received for reports relating to Communications Hub ownership were up to 70% inaccurate. The Proposer advised that the data is sourced by the DCC through the registration data. A meter Manufacturer representative suggested that this information is provided with a caveat that states that accuracy is not guaranteed. However, registration data still appears to be the most accurate method of understanding which Supplier supplies a Device, as it is unlikely a gaining Supplier will contact the Manufacturer to update their records. A Large Supplier representative added that the data could be validated by Suppliers to maintain a higher level of accuracy.

GUID list submission

For MAPs to receive the DCC-produced report for their assets, they must submit a list of GUIDs to the DCC which will then be verified.

SECAS initially suggested that to uphold the highest level of accuracy, MAPs should upload a GUID list daily. This is currently the case for DO353 DCC full refresh files which are uploaded every 24 hours at 6:00AM. The Proposer commented that there is no benefit in MAPs providing a GUID refresh every day and the cost and effort of doing so would most likely outweigh the benefits of the reporting service. The DCC added that it would be more reasonable for MAPs to submit a monthly file.

The Proposer would like an efficient process for providing the GUIDs to the DCC and suggests providing the updated list each time they request a report. The MAP will also warrant that the GUIDs are owned by that MAP.

In terms of validating the submitted GUID lists, the DCC has advised that it would check GUIDs for duplication. If it receives the GUID from two different MAPs, the data would not be presented to either MAP and DCC would flag to them both to investigate. This is the same process that is currently used with the Xoserve service. The DCC also advised that following the introduction of the Faster Switching programme, it should have access to a greater pool of data that will add a further step of validation.

The Proposer has stated that there is no benefit to a MAP to receiving data for GUIDs that are not owned by the MAP if an erroneous GUID is provided (in good faith) by a MAP. A MAP cannot tell who the GUID is owned by, so it provides no commercial benefit to the MAP erroneously receiving the data. This scenario should be mitigated provided that basic checks are carried out.

Data held within DCC Systems

During a Working Group session, a Large Supplier representative suggested that costs associated with Suppliers uploading data to the DCC Systems should be considered when assessing this modification. This has been done since the go-live of the DCC and will continue, however the Proposer has advised that this data will have to be uploaded regardless of this modification's implementation. Please note that this modification is a legal text-only change and will cost approximately £600 to implement. The cost to develop the reporting mechanism is anticipated to cost approximately £12,000, which will take place outside of this modification.

Use of data

The Working Group requested that MAPs explicitly state that they would not use Supplier ID and effective from data for charging purposes and this be highlighted in the Modification Report. The Proposer and another MAP representative confirmed that the data would not be used for this purpose. They further advised that as MAPs already have access to this data, this attribute would only be used by Manufacturers.

GDPR

During the Working Group, SECAS informed members of the SEC Lawyer's position that the DCC can disclose the requested data if it is carrying out 'permitted business'. A Working Group member queried whether this means that DCC can disclose any data if carrying out 'permitted business'. The DCC responded to state that the DCC cannot carry out any activities that contravene any of the General Data Protection Regulation (GDPR) principles but if it is allowed by law and codified in the SEC then the DCC could then perform the relevant activity.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objectives (a)² and (c)³, as the Proposed Solution will aid Suppliers in the provision of optimum smart meter – firmware combinations. The installation of these Devices will also allow consumers to better manage their electricity and gas usage as the Devices will provide the optimum level of performance.

Industry views

Industry views on the SEC Objectives will be gathered during the Refinement Consultation.

Views against the consumer areas

Improved safety and reliability

This modification will have a positive impact on the safety and reliability of smart metering as the MAPs and Manufacturers will be able to advise Suppliers on optimum Device – firmware combinations that will provide a high level of service to customers.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the price of consumers' bills.

² Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

³ Facilitate energy consumers' management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

Reduced environmental damage

This modification will have a positive impact on reducing environmental damage as the data can be used to identify optimum Device – firmware combinations, preventing sub-optimum combinations being installed and potentially replaced due to poor performance.

Improved quality of service

This modification will result in an improved quality of service as MAPs and Device Manufacturers will be able to advise Suppliers on optimum Device – firmware combinations.

Benefits for society as a whole

This modification will provide benefits to society as it will help ensure that the benefits of the Smart Metering Implementation Programme (SMIP) are realised.

Appendix 1: Progression timetable

During the March 2022 Working Group it was agreed that this modification is ready to be issued for Refinement Consultation. SECAS will present the consultation responses to the Working Group, before returning to the CSC under the recommendation that this modification proceeds to the Report Phase.

Timetable	
Event/Action	Date
Draft Proposal raised	8 Sep 2021
Presented to SEC Sub-Committees for input	Sep 2021
CSC converts Draft Proposal to Modification Proposal	28 Sep 2021
Business requirements drafted with the Proposer	Oct - Nov 2021
Business requirements workshop	18 Nov 2021
Modification discussed with Working Group	1 Dec 2021
Modification discussed with SSC	8 Dec 2021
DCC Preliminary Assessment requested	15 Dec 2021
DCC Preliminary Assessment returned	26 Jan 2022
DCC Preliminary Assessment discussed with the Working Group	2 Mar 2022
Refinement Consultation	25 Apr – 17 May 2022
Modification discussed with Working Group	1 Jun 2022
Modification Report approved by CSC	21 Jun 2022

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
BEAMA	British Electrotechnical and Allied Manufacturers' Association
CPL	Central Products List
CSC	Change Sub-Committee
DCC	Data Communications Company
ECS	Elective Communication Service
CSP	Communications Service Provider
EUA	Energy and Utilities Alliance
GDPR	General Data Protection Regulation
GUID	Global Unique Identifier
JMM	Joint Meter Manufacturer
MAP	Meter Asset Provider
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SFTP	Secure File Transfer Protocol
SM WAN	Smart Metering Wide Area Network
SMI	Smart Metering Inventory
SMIP	Smart Metering Implementation Programme
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TOC	Technical Operations Centre