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What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

## Stage 01: Initial Modification Report

# SECMP0038:

# Sending Commands via PPMIDs

This modification seeks to offer the option for Prepayment Meter Interface Devices (PPMIDs) to be able to pass fully formed Great Britain Companion Specification (GBCS) Remote Party Commands onto the Home Area Network (HAN). It is expected that the Commands would usually be routed from the Supplier to the PPMID via Wi-Fi connectivity.

### Modification raised by:

Utilita Energy

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The recommendation is that this Modification Proposal should:

- follow Path 2: Authority Determined; and
- be progressed through the Refinement Process.



Impact on:

- Data and Communications Company (DCC)
- DCC Users

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## About this document

This document is an Initial Modification Report (IMR). It enables the SEC Panel to carry out its initial consideration on how this Modification Proposal should be progressed through the Modification Process.

The Panel will consider this IMR at its meeting on 9<sup>th</sup> June 2017.

This IMR has two attachments:

- **Attachment A:** SECMP0038 Modification Proposal Form;
- **Attachment B:** Working Group Terms of Reference

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# 1. Summary

This section provides an overview of SECMP0038. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (Appendix A) of this document.

## 1.1 Why Change?

Smart Metering Equipment Technical Specification 1 (SMETS1) meters use GB mobile telephone networks for their Wide Area Network (WAN) connections. SMETS2 meters have not yet been deployed in significant numbers, but those in two out of three Communication Service Provider (CSP) regions will also use the GB mobile telephone networks for WAN connections. Thus, WAN performance in SMETS1 deployments gives the best current indication of the likely SMETS2 WAN performance in two out of three CSP regions.

The Proposer (Utilita) has over 90% success with WAN, however they have found that over 9% of their SMETS1 meters continue to have an unpredictable quality of WAN coverage following installation, even using roaming sim technology which will link into the strongest mobile phone network signal. This means that the meter has WAN intermittently and the WAN connection, to material numbers of Premises, is not sufficiently reliable to deliver configuration Commands in a sufficiently timely manner.

SECMP0038 is one of a pair of modifications that replace SECMP0031 to better support customers when faced with intermittent or no WAN situations. This modification seeks to allow for alternative ways to deliver Commands to SMETS2 Devices, to cater for situations where the WAN connection is not of sufficient quality to deliver them in a timely manner. Thus, reducing the possible consumer detriment to SMETS2 customers.

## 1.2 Solution

This modification proposes to require that a Communications Hub (CH) accepts any GBCS Command sent down to ZigBee tunnel<sup>1</sup> from a PPMID, rather than only a subset of Commands.

## 1.3 Impacts and Costs

This modification will impact the DCC and DCC Users. SECMP0038 is expected to impact Smart Metering Systems and/or Communications Hubs, however, only Users who chose to use the additional functionality would need to supply their Consumers with PPMIDs with suitable additional communications ability, so as to receive the additional GBCS Remote Party Commands.

## 1.4 Implementation

The Proposer requests the implementation to be in the next release, where a CH firmware upgrade is included.

## 1.5 Proposed progression

The Proposer recommends that SECMP0038 is progressed as a Path 3 'Self-Governance' Modification. However, SECAS proposes that SECMP0038 should be progressed as a Path 2 'Authority Determined'

<sup>1</sup> All Remote Party Messages are carried across the SM HAN using the *Tunnelling Cluster's* TransferData command. Note that Type 2 Devices such as IHDs are not required to send or receive Remote Party Messages and so are not required to support the *Tunnelling Cluster*.

Modification. The reasoning for this is that the changes may be material and involve impacts on devices or the GB Companion Specification, or may require EC notification. As the Authority undertakes the EC notification activities, the modification cannot be progressed as a Path 3 change.

Also, due to the requirement of likely testing as part of implementation of this modification, it is proposed that SECMP0038 should proceed into the Refinement Process for assessment and development by a Working Group.

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## 2. What is the issue?

### 2.1 Background

A large volume of SMETS1 meters have been deployed over several years. They use the Great Britain mobile telephone networks for its WAN connections. SMETS2 Meters are not yet deployed in significant numbers but those in two out of three CSP regions will also use the GB mobile telephone networks for WAN connections. Thus, WAN performance in SMETS1 deployments gives the best available current indication of the likely SMETS2 WAN performance in two of the three CSP regions.

This modification is a more refined version of SECMP0031 but achieves a similar outcome by providing DCC Users with a mechanism of delivering Critical Commands to a meter where WAN is unreliable.

### 2.2 What is the issue?

Utilita (the Proposer) has been installing SMETS1 meters since 2013. While it has had over 90% success with WAN, they have found that over 9% of its SMETS1 meters continue to have an unpredictable quality of WAN coverage following installation. This has occurred even where the roaming sim technology has been used, which will link into the strongest mobile phone network signal. This means that if the meter has WAN intermittently and the WAN connection to a material number of Premises is not sufficiently reliable, then the delivery of configuration Commands do not occur in a sufficiently timely manner.

As a main Pre-Payment Meter (PPM) supplier, Utilita's customer base tends to be mainly in populous areas which usually have good signals; the risk of unpredictable or poor WAN must be considered higher in less populous areas.

This is especially critical for prepayment customers, since configuration Commands affect supply of energy to their homes. It is not viable to wait for an uncertain period for WAN quality to increase sufficiently, before their supply issues are addressed. SMETS1 solutions to address this problem have been developed and refined over 15 years, but the Proposer indicates that there is no current SMETS2 solutions, other than sending an engineer with a Hand-Held Terminal (HHT) to the Consumer's Premises.

The purpose of this modification is to allow for alternative ways to deliver Commands to SMETS2 Devices (and beyond), to cater for situation where the WAN connection is not of sufficient quality to deliver them in a timely manner. Thus, reducing the likelihood of consumer experiencing a detriment experience from SMETS2 metering systems.

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## 3. Solution

### 3.1 What's the solution?

The DCC has already implemented a technical solution to the problem of GBCS Command delivery other than via the WAN. It has the following component parts:

1. When a DCC User submits a non-critical Service Request or a Signed Pre-Command to the DCC, the DCC User can request that a copy of the resulting GBCS Command is returned to it<sup>2</sup>. For Non-Critical Service Requests, these are DCC User Interface Specification (DUIS) Command Variants 2<sup>3</sup> and 3<sup>4</sup>; for Signed Pre-Commands, they are Command Variants 6<sup>5</sup> and 7<sup>6</sup>.
2. The DCC User transmits this GBCS Command (which is a number) to a HHT that has been connected to the CH, to which the target device is attached. This transmission can take place in any what the DCC User chooses (e.g. Wi-Fi combinations of Bluetooth® and 3G<sup>7</sup>).
3. The HHT is required by GBCS to establish a ZigBee 'tunnel' to the CH (and so be a ZigBee tunnelling server).
4. The HHT can send GBCS Commands down this tunnel and the CH is required to forward such GBCS Commands to the target Device.
5. When the target Device receives the GBCS Commands, it will process them in exactly the same way as it would had they been delivered in any other way. This is because the GBCS Command is simply a number – the technology used to transmit the number does not change that number.

In terms of points 3, 4 and 5, the existing requirements in relation to a PPMID are almost identical to that for an HHT – the point in **bold** is the current difference:

3. The PPMID is required by GBCS to establish a ZigBee 'tunnel' to the CH (and so be a Zigbee tunnelling client), and the CH is required to accept such 'tunnels' (and so be a ZigBee tunnelling server).
4. The PPMID can send **a subset of** GBCS Commands down this tunnel and the CH is required to forward such GBCS Commands to the target Device.
5. When the target Device receives the GBCS Command, it will process it in exactly the same way as it would if it had been delivered in any other way. This is because the GBCS Command is simply a number – the technology used to transmit the number does not change that number.

<sup>2</sup> Like all Messages, a GBCS Command is simply a binary number. Strictly what is returned is an encoded version of that number, which is safe to send in XML documents.

<sup>3</sup> Non-Critical Service Request for Command to be returned to the User for local delivery to a Device

<sup>4</sup> Non-Critical Service Request for Command to be sent to a Device via the SM WAN as well as a copy to be returned to the User for local delivery

<sup>5</sup> Critical Signed Pre-Command indicating Command to be returned to the User for local delivery to a Device

<sup>6</sup> Critical Service Request for Command to be sent to a Device via the SM WAN as well as a copy to be returned to the User for local delivery.

<sup>7</sup> A mobile communications standard that allows mobile phones, computers, and other portable electronic devices to access the Internet wirelessly.

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Thus, the proposed change is to require that a CH accepts any GBCS Command sent down a ZigBee tunnel from a PPMID, rather than the current subset of Commands.

This functionality, to accept any GBCS Command, has already been built in to CH for HHT connections, so would only need extending to PPMID connections.

This would give DCC Users the option to use the existing mechanisms to get a GBCS Command for local delivery from the DCC, and provide that GBCS Command to their PPMID in a way of their choosing (e.g. Wi-Fi or Bluetooth from a mobile app.). DCC Users taking up this option would need to ensure their customers have a PPMID with the requisite communications capability.

There would be no mandated requirement on any DCC User to use this mechanism, nor to provide PPMID capable of receiving such Commands for local delivery. This aligns with the current HHT mechanism, where there is no obligation on any DCC User to have or use HHTs.

Thus, the only change identified by the Proposer is a change to CH requirements, as specified by the bullet point in Section 3.2 'Proposed Draft Legal Text'. It is proposed that this change be incorporated into the next Technical Specification Group (TSG) version which requires other changes in CH functionality, which is to be deployed across all CH to minimise costs.

Wider requirements for CH changes are that they are applied to both new CH and, by way of firmware upgrade, to all installed CH. Thus, given this change would be bundled with wider CH changes, it would be applied to all existing and future CH.

Note that this does not change any of the security protections for GBCS Commands or their processing. GBCS Command delivery via this route would have the same security protections and requirements as those delivered via the WAN or HHT.

## 3.2 Proposed Draft Legal Text

### Technical Specification changes required to the GBCS:

To the version of GBCS in which this change is to be implemented<sup>8</sup>, add the underlined bullet to specify the additional CH requirement:

#### **10.8.2 CH Routing of Remote Party Commands and SME.C.PPMID-GSME and Alerts**

Whenever CH receives either:

- a Remote Party Message via its WAN interface; or
- a Remote Party Message in the Data parameter payload of a Transfer Data command which is from an HHT;
- a Remote Party Command in the Data parameter payload of a Transfer Data command which is from a PPMID;  
or
- an SME.C.PPMID-GSME Message in the Data parameter payload of a Transfer Data command from a Device, which is in its CHF Device Log,

<sup>8</sup> This section of GBCS is introduced by BEIS IRP521



the CH shall:

- process the Message Header Structure(s) in that Message sufficiently to identify the target Device's Entity Identifier; and
- where the identified Device is in the CHF Device log and is not an HHT, GBF or CHF, attempt to deliver that Message to the identified Device.

The proposed legal drafting to deliver the proposed solution is also provided in **Attachment B**.

### 3.3 Proposed Implementation Approach

The Proposer has indicated that SECMP0038 should be implemented in the next release where a CH firmware upgrade is included.

### 3.4 Views against SEC Objectives

The table below highlights the Proposer's view on how this modification will better facilitate the achievement of the SEC objectives.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
a) to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.	The Proposer believes that SECMP0038 supports the management of SMETS2 meters, enabling the customer's meter to be set to the correct price, correct credit, correct debt and mode where there is no SM WAN (either temporarily or permanently unavailable).
c) to facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	The Proposer believes that SECMP0038 is designed to enable more customers to experience the services available through Smart Meters more of the time. Prepayment customers with SMETS2 meters are currently at risk of being disadvantaged when compared to the previous SMETS1 generation prepayment customer. Therefore, this better facilitates the customer's ability to manage their energy use.
e) to facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy.	The Proposer believes that SECMP0038 will enable SMETS2 customers with no SM WAN to be aligned with the prepayment price cap <sup>9</sup> , unless customers wish to pay more. This modification would also enable universal innovation to be applied to all customers especially those in poor service regions.

<sup>9</sup> From 1 April 2017, the amount of money suppliers can charge a domestic prepayment meter (PPM) customer will be subject to a transitional cap: the Prepayment Charge Restriction (or prepayment price cap). The price cap is one of the remedies introduced following the Competitions and Markets Authority's (CMA) investigation into energy markets.

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## 4. Potential Impacts

### 4.1 Impacts

The following section sets out the assessment of the likely impacts arising from SECMP0038.

Potential Impacts of SECMP0038	
Smart Energy Code Parties	
Suppliers	There are no direct impacts identified at this stage. However Suppliers may be impacted where they choose to utilise this functionality.
Networks	There are no direct impacts identified at this stage.
DCC	DCC is expected to be impacted by this modification.
Other	The Other SEC Party category is expected to be impacted by this modification, due to impacts on devices.
Systems	
DCC Systems	There are no impacts identified at this stage. However, impacts maybe identified during the refinement of this modification.
User Systems	
Smart Metering Systems	Smart Metering Systems and/or Communications Hubs are expected to be impacted by this modification.
Other	There are no impacts identified at this stage.
SEC and Subsidiary Documents	
SEC Sections	No SEC Sections or Schedules are impacted by this modification.
Subsidiary Documents	Great Britain Companion Specification (GBCS) document is expected to be impacted by this modification.
Other Industry Codes and Documents	
There are no impacts on other industry codes and documents anticipated.	
Greenhouse gas emissions	
There are no impacts on greenhouse gas emissions anticipated.	
Impact on Consumers	

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No impacts have been identified on Consumers.

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## 5. Proposed Progression

### 5.1 Modification Path

The Proposer has recommended that this Modification should proceed as a Path 3 ‘Self-Governance’ modification.

SECAS have considered the requirements set out in Section D2.6 as well as the general materiality guidance and due to the impacts on GBCS and that may have consequential impacts on devices, the modification should proceed as a Path 2 ‘Authority Determination’ modification. In addition, the changes associated with the modification may require European Commission (EC) notification, which is undertaken by the Authority, therefore preventing progression as a Path 3 change.

### 5.2 Refinement

It is also recommended that SECMP0038 should proceed to the Refinement Process. This is because SECMP0038 is likely to impact DCC due to modification require changes to Communication Hubs, that will require consideration by the Working Group and analysis by the DCC. In addition, there may be impact on other devices associated with this change.

### 5.3 Indicative Progression Plan

The following is a high level indicative progression plan. The detail in this plan is subject to change. Changes to the overall timetable, however, are subject to a Panel review.

Modification Timetable	
Stage	Timescales
Modification Proposal raised	1 <sup>st</sup> June 2017
IMR considered by Panel	2 <sup>nd</sup> June – 9 <sup>th</sup> June 2017
Refinement Process	June 2017 – February 2018
Modification Report to the Panel	March 2018
Change Board vote	April 2018
Authority Decision	May 2018
Implementation	June 2019 (earliest potential implementation date, assuming a potential DCC lead time to implement of 12 months <sup>10</sup> )

<sup>10</sup> Based on timescales indicated in prior DCC PAs and IAs. Implementation date could be sooner subject to the nature and impact of the solution developed.

## 5.4 Working Group

The Working Group should be made up of existing Working Group members who have previously considered Modification Proposals that have an impact on DCC Services and activities, supplemented by other interested SEC Parties.

## 5.5 Working Group terms of Reference

A complete Terms of Reference for this Working Group can be found in Attachment B.

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## 6. SEC Panel Decisions

The Panel:

- **AGREED** for SECMP0038 to progress to the Refinement Process;
- **AGREED** for SECMP0038 to progress as a Path 2 – Authority Determined modification and the progression timetable outlined in this IMR; and
- **AGREED** with the Working Group Terms of Reference provided in **Attachment B**.

## 7. Further Information

More Information is available in:

- **Attachment A:** SECMP0038 - Modification Proposal Form; and
- **Attachment B:** SECMP0038 - Working Group Terms of Reference;

For further information please see the Modification register page of the SEC website or contact SECAS at: [secas@gemserv.com](mailto:secas@gemserv.com)

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## Appendix A – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
	Command	Means a communication to a Device in the format required by the GB Companion Specification and which incorporates all Digital Signatures and/or Message Authentication Codes required by the GB Companion Specification.
	Command Variant	Means the value of a Common Object Data Item included in each Service Request and Signed Pre-Command to indicate to the DCC if that message has to be: transformed to a GBCS Format Command and returned to the User for signing; sent to a Device; returned to User to be locally applied (via a Hand Held Terminal); both sent to the Device and returned to the User to be locally applied (via Hand Held Terminal); or executed by the DCC.
CH	Communications Hub	Means by a physical device that includes a Communications Hub Function together with a Gas Proxy Function; save that, when such expression is used in relation to the following provisions, such expression shall be interpreted in accordance with the definition of that expression in the DCC Licence: <ul style="list-style-type: none"> <li>a) the definitions of “CH Defect” and “Test Communications Hub”; and</li> <li>b) Sections F5 (Communications Hub Forecasts &amp; Orders) and F10 (Test Communications Hubs).</li> </ul>
CSP	Communications Service Provider	The service provider delivering and managing the SMWAN infrastructure and Communications Hubs to enable remote communication and management of SME across the whole of Great Britain.
	Data	Means any information, data, knowledge, figures, methodologies, minutes, reports, forecasts, images, or sounds (together with any database made up of any of these) embodied in any medium (whether tangible or electronic).
DCC	Data and Communications Company	
	Device	Means one of the following individual devices: (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Meter Interface Device; (f) a HAN Connected Auxiliary Load Control Switch; and (g) any Type 2 Device.
DUIS	DCC User Interface Specification	Means the SEC Subsidiary Document identified as the DCC User Gateway Interface Specification’ set out in Appendix.
	Fast-Track Modifications	Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).
GBCS	GB Companion Specification	Means the document of that name set out in Schedule 8.
	General SEC Objectives	Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0).  The SEC Objectives are those objectives that the SEC has been designed to achieve.
	Greenhouse Gas Emission	Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).
HHT	Hand Held Terminal	The HHT is ancillary equipment that may be used by energy Supplier staff (field engineers) to support installation and maintenance of SME.

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Glossary		
Acronym	Term	Plain English Summary
HAN	Home Area Network	Means, for each Smart Metering System, the home area network created by the Communications Hub Function forming part of that Smart Metering System.
	Non-Critical Service Request	Means a Service Request which is not identified as critical in the DCC User Interface Services Schedule (or, in the case of Elective Communication Services, the relevant Bilateral Agreement).
	Path Type	Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: <ul style="list-style-type: none"> <li><b>Path 1 Modifications: Authority-led</b> (Section D2.4/D2.5, SEC Stage 3.0)</li> <li><b>Path 2 Modifications: Authority Determination</b> (Section D2.6, SEC Stage 3.0)</li> <li><b>Path 3 Modifications: Self-Governance</b> (Section D2.7, SEC Stage 3.0)</li> <li><b>Path 4 Modifications: Fast-Track Modifications</b> (Section D2.8, SEC Stage 3.0)</li> </ul>
	Party Category	Means one of the following categories: <ul style="list-style-type: none"> <li>(a) the Large Supplier Parties collectively;</li> <li>(b) the Small Supplier Parties collectively;</li> <li>(c) the Electricity Network Parties collectively;</li> <li>(d) the Gas Network Parties collectively; or</li> <li>(e) the Other Sec Parties collectively.</li> </ul> (Section A1, SEC Stage 3.0).
PPMID	Prepayment Meter Interface Device	Means a device installed (or to be installed) at a premises, which: <ul style="list-style-type: none"> <li>a) consists of the components or other apparatus identified in; and</li> <li>b) as a minimum, has the functional capability specified by and complies with the other requirements of,</li> </ul> a Version of the PPMID Technical Specification which was within its Installation Validity Period on the date on which the device was installed.
SR	Service Request	Means a request sent by a User to the DCC for one of the services listed in the DUIS document. The DUIS requires Service Requests to be submitted in Extensible Markup Language (XML).
	Signed Pre-Command	Means a communication containing the Digitally Signed GBCS Payload of a Pre-Command that has been Digitally Signed by a User or the CoS Party.
SM WAN	Smart Meter Wide Area Network	A network infrastructure provided to enable the sending and retrieval of information between the DCC and SME installed and commissioned for operation through the DCC.
SMETS	Smart Metering Equipment Technical Specifications	The document designated by the Secretary of State to describe the minimum capabilities of equipment installed to satisfy the roll-out licence conditions.
	Smart Metering Systems	Means either: <ul style="list-style-type: none"> <li>(a) an Electricity Smart Meter together with the Communications Hub Function with which it is Associated, together with the Type 1 Devices (of any) that may from time to time be Associated with that Electricity Smart Meter; or</li> </ul>

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Glossary		
Acronym	Term	Plain English Summary
		(b) a Gas Smart Meter together with the Communications Hub Function with which it is associated and an Associated Gas Proxy Function, together with the Type 1 Devices (if any) that may from time to time be Associated with that Gas Proxy Function.
	TransferData Command	In common with the transport of all Remote Party or SME.C.PPMID-GSME Messages, the mechanism used is the TransferData command.
UTRN	Unique Transaction Reference Number	Means a cryptographic code used to convey credit through human transfer to a GSMS or ESMS operating in Prepayment mode.
	Urgent Proposal	Means a Modification Proposal deemed an Urgent Proposal where the Authority directs the Panel to treat the Modification Proposal as an urgent Proposal (whether following a referral by the Panel pursuant to Section D4.5, or at the Authority's own initiation) (Section D4.5/D4.6, SEC Stage 3.0).
	User Systems	Means, in respect of each User (DCC User), the Systems of that User (including, where relevant, those of its Supplier Nominated Agent) used in relation to the Services and/or Smart Metering Systems (Section A1, SEC Stage 3.0).  The Proposer may wish to consider Suppliers; Network Operators; Registration Data Providers; Other DCC Users (e.g. Authorised Third Parties / Switching Sites); Supplier Nominated Agents.
	ZigBee	Means the wireless language that everyday devices use to connect to one another.

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