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Action:	For Decision

CPL Processing Issue Update

1. Purpose

This paper provides an update on the recent DCC Data Service Provider (DSP) issue that is blocking Certified Product List (CPL) updates from uploading into the DCC DSP systems, and recommends a way forward until an appropriate fix is deployed by the DCC. The paper also sets out a potential solution for resolving existing GB Companion Specification (GBCS) compliance matters associated with current CPL entries.

2. Introduction and Background

In accordance with SEC Section F2, the CPL is established and maintained by, SECAS on behalf of, the SEC Panel. The CPL is a list of Device Models by Device Type, which have been granted the required Assurance Certificates. The CPL also acts as a means for the DCC to manage their Smart Metering Inventory (SMI), controlling the Devices with which they can communicate.

SEC Appendix Z lists the required CPL contents in respect of each Device Model, including the version of the SMETS or CHTS (as applicable) and the GBCS version for which the Device Model has one or more Assurance Certificates.

On 6th November 2017, GBCS v1.1 came into effect. Alongside the designation of GBCS v1.1 a six-month overlap period was put in place whereby GBCS v1.0 remained valid until 7th May 2018. This was to enable Parties and Manufacturers to be prepared for when GBCS v1.0 stopped being an applicable version.

3. The Issue

Since November 2017 SECAS has been engaging with the DCC in relation to the end date of GBCS v1.0 and its potential implications on the CPL submission/update processes, since GBCS v1.1 will be the only active version of GBCS.

SECAS were advised on 4th May 2018 that the DCC DSP systems were not configured to recognise different Technical Specification versions. Since GBCS is a Technical Specification, any CPL submission that references GBCS v1.1 (rather than GBCS v1.0) are therefore not recognised by the DCC DSP Systems and are blocked from being uploaded.

Following the notification that the DCC DSP Systems would not recognise CPL data containing GBCS v1.1 on 4th May 2018 SECAS continued engagement with the DCC on the matter, highlighting that

any CPL submissions containing GBCS v1.1 from a SEC perspective will be processed as a valid submission and added to the CPL spreadsheet.

This theoretical issue became reality on 9th May 2018 when two new Device Model CPL submissions containing GBCS v1.1 (as the applicable version) were processed as a valid submission, and subsequently failed to be processed as it was rejected by the DCC DSP validation of GBCS versions it recognises.

4. Progress to date on the issue

At its meeting on Friday 11th May 2018, SECAS notified the SEC Panel of the CPL processing issue. The Panel agreed to send a notification to Parties to make them aware of the ongoing issue. This was sent on Monday 14th May 2018.

In parallel, the DCC undertook an Impact Assessment (IA) to determine the required fix to the DCC DSP System and to identify how long it would take to deliver this fix.

On 18th May 2018, SECAS were informed by the DCC that this fix may not be in place until 22nd June 2018, although the DCC are continuing to push the DSP to have the fix in place sooner. In addition, the DCC confirmed that the matter is now being treated as a Severity 2 Incident, in accordance with SEC Section H9 'Incident Management Policy'. The rationale as to why the DCC has treated the issue as a Severity 2 incident is provided in Appendix A.

A subsequent update was provided from the DCC on 21st May 2018, indicating that the Solution design to the issue is expected to be completed on 12th June 2018, with the fix being deployed thereafter (on or before 22nd June 2018).

5. Options for consideration

Due to the DCC DSP system fix not being in place for approximately up to 5 weeks, SECAS and the DCC have investigated interim options to enable CPL submissions to continue until the fix is deployed. Table 1 outlines the potential options, including the associated risks and potential consequential impacts.

Option	Summary Name	Description	Pros	Cons	Risks
A	Compliant with SEC requirements (wait until the DCC DSP fix is in place)	Follow the existing SEC requirements and defined processes. Future valid CPL submissions (containing GBCS v1.1) will continue to be processed and updated within one Working Day to provide the updated CPL to the DCC (by way of a .csv extract) in accordance with the CPL Requirements Document. This approach enables the SEC Panel to meet its SEC requirements. This approach allows new CPL submissions to be buffered until such time the DSP fix is in place.	<ul style="list-style-type: none"> • SEC Compliant process: SEC Panel continues to follow the SEC Requirements. • Sets a clear precedent of not resolving System issues associated with the CPL through deployment of workarounds, that may cause wider consequential issues. 	<ul style="list-style-type: none"> • No update of CPL in DCC system possible until issue resolution. • Delay to roll-out and installation of new Devices and associated Commercial impacts on SEC Parties and/or Manufacturers. • Due to the CPL data not being uploaded into the SMI within the required 24-hour period, the DCC will be in breach of its SEC requirements. 	<ul style="list-style-type: none"> • DSP uses the GBCS value to control which DUIS Service Requests and GBCS Command/Responses/Alerts are applicable to a Device. This process associated with GBCS versions currently appears to be non-functioning.
B	Deploy workaround/ interim approach (until the DCC DSP fix is in place)	SECAS to manually amend the two previously accepted CPL entries from GBCS v1.1 to GBCS v1.0 to unblock the CPL data and allow the upload into the DCC DSP system. Any future CPL submissions would also have the reference to GBCS v1.1	<ul style="list-style-type: none"> • No impact on Supplier installations, as it would enable the continuation of pilot installations. • Reduced impacts on Suppliers and Device Manufacturers commercial aspects 	<ul style="list-style-type: none"> • Once DSP fix is in place Suppliers and/or Manufacturers will need to submit a new CPL submission for the device entry to correctly refer to GBCS v1.1. (This correction submission could be part of a firmware update). 	<ul style="list-style-type: none"> • DCC systems reject re-submissions with duplicate details, this burdens Manufacturers with additional software changes (OTA header details) when correcting GBCS version. DCC view is that the DSP will accept a line with GBCS v1.0 followed by a subsequent CPL entry with GBCS v1.1 as the only

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Option	Summary Name	Description	Pros	Cons	Risks
		amended to GBCS v1.0 until the issue is resolved.		<ul style="list-style-type: none"> Additional effort from Manufacturers and Suppliers required to re-submit Devices to correct and replace the workaround entries. 	<p>change, however this would need to be tested by the DCC DSP.</p> <p>May lead to long lasting Device capabilities misrepresentation on the CPL. However, if the version is changed to represent GBCS v1.1 via a subsequent update, then the true record and history is accurately recorded.</p> <ul style="list-style-type: none"> Lack of certainty that DCC system processes will work as expected, due to misalignment of GBCS versions within the DCC DSP Systems For the interim period, referencing of GBCS v1.0 recorded in SMI not representative of actual device capabilities which are aligned with GBCS v1.1.

Table 1 – Potential CPL Processing Options until the DCC DSP System fix is deployed

6. DCC View

The DCC has provided its view on the interim options, and have indicated that they strongly favour Option B. The DCC is of the view that the two blocked CPL entries, and any subsequent CPL submissions, should reference GBCS v1.0 until the fix is deployed. As noted above, this would enable the processing of CPL submissions that have been blocked until the solution is deployed.

The DCC has also observed that the changes between GBCS v1.0 and GBCS v1.1 are small. However, the DCC cannot provide complete assurance that GBCS v1.1 device firmware will work with a GBCS v1.0 DSP baseline, if the blocked entries are amended to reference GBCS v1.0.

Finally, in relation to the solution deployment in June 2018, the DCC has advised that it is likely that it will exceed its 6-hour outage period in June (subject to further assessment). DCC are also considering when we could provide the 20-day notification period for the introduction of the DSP production change, notwithstanding the exact date for the solution deployment is still to be finalised.

7. SECAS Recommendation

SECAS recommends Option A as the most appropriate option from a SEC compliance and lower associated implementation risk perspective. Taking this approach also does not have a consequence of putting additional burden on SEC Parties and Device Manufacturers post DCC DSP System fix.

SECAS will continue to process and accept valid CPL submissions from the industry until the DSP fix is delivered. The approach of following the existing process may add another incentive for the DCC to push its DSP to deploy a fix as soon as possible.

Once the DCC DSP fix is in place SECAS will deliver the buffered CPL submissions for upload by the DCC DSP. This would include the new GBCS v1.1 referencing entries for the DCC to upload into the SMI at which point installs and Device communications for the newly added devices, will be able to commence.

8. Other CPL matters for consideration – entries referencing GBCS v1.0

In addition to the GBCS v1.1 blocking issue, all current active entries on the CPL that are uploaded into the DCC Systems still reference GBCS v1.0. As the validity period of GBCS v1.0 ended on 7th May 2018, all the devices on the CPL need to be updated to refer and meet the valid and active GBCS v1.1.

As noted above, it is not possible to amend the GBCS versioning references in the existing entries to address this matter as such updates would be blocked when the DCC uploads the CPL into its systems. Instead a new CPL submission would be required for that device to correct the GBCS version number referencing (potentially alongside a Firmware update).

In recognition of the fact that any move to update the GBCS version reference would have been blocked due to the DCC DSP System issue, it is proposed to notify Suppliers and Manufacturers that they will need to update the CPL entries as soon as possible (potentially in conjunction with a Firmware update).

They will need to complete this activity within 3 months of being notified. If this is not actioned, it is proposed that the Panel at its September meeting should consider removing the entries from the CPL

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that have not been corrected. This will also ensure there is a clean baseline of CPL entries in advance of Release 2.0 going live in late September 2018, which will see the commencing of CPL submissions that reference new versions of GBCS and associated Technical Specifications.

9. Next Steps

Subject to the Panel considerations of the matters outlined above, SECAS will issue notifications advising interested parties of the Panel's agreed way forward with the GBCS v1.1 DCC DSP System issue.

Parties will also be notified of the approach being taken in relation to existing entries that currently refer to GBCS v1.0 and how they will be updated to refer to GBCS v1.1.

An update will be provided by the DCC at the 15th June 2018 Panel meeting on the progress of the DCC DSP System fix.

In addition, the wider issue on the ability for the DCC to be prepared for CPL submission process changes associated with GBCS and Technical Specification changes will be added to the Panel Issue Register for discussion at the June Panel meeting.

10. Recommendations

The Panel is requested to:

- **AGREE** to proceed with Option A with regards to the CPL submission blocking issue; and
- **AGREE** to give SEC Parties and Manufacturers three months' notice to take the necessary steps to update and correctly reference GBCS v1.1 for all existing active CPL entries.

David Barber

SECAS Team

22nd May 2018

Appendix A – DCC rationale for the treating the DCC DSP upload of the CPL data as a Severity 2 incident

Incident Severity status	Severity level description	DCC views against the Severity status
1	<p>A Category 1 Incident (Major Incident) is an Incident which, in the reasonable opinion of the DCC:</p> <ul style="list-style-type: none"> prevents a large group of Incident Parties from using the Live Services; has a critical adverse impact on the activities of the Incident Parties using the Live Services of the DCC; causes significant financial loss and/or disruption to the Incident Parties; or results in any material loss or corruption of DCC Data. 	<ul style="list-style-type: none"> This Incident does not prevent any party from using the core DCC live service. The DCC did not deem the current impact to users to have a critically adverse impact, although should the scale of pending devices increase, the impact would be reassessed accordingly. Currently there are two ESMEs we are unable to load into DSP systems for install and we understand that two suppliers are currently installing with this meter manufacturer, both of which have successfully installed with the previously approved CPL version (one has successfully installed since). Due to the number of customers installing with the meter set currently affected, DCC did not deem this to cause significant financial loss or significant disruption. Installations and connectivity has been available throughout for all previously approved firmware versions. n/a to this incident
2	<p>An Severity 2 Incident which in the reasonable opinion of the DCC:</p> <ul style="list-style-type: none"> has a non-critical adverse impact on the activities of Incident Parties, but the Live Service is still working at a reduced capacity; or 	<ul style="list-style-type: none"> The live DCC service is working with a reduced capacity, i.e. we are unable to add newly approved device firmware versions to the environment via the certified product list, this allowing them to be installed in the environment. For all

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	<ul style="list-style-type: none"> causes financial loss and/or disruption to other Incident Parties which is more than trivial but less severe than the significant financial loss described in the definition of a Category 1 Incident. 	<p>previously installed devices and approved device firmware that had been added to the environment, there is no impact.</p> <ul style="list-style-type: none"> At this point the DCC did not deem the possibility for financial loss to be significant, but acknowledge potential disruption to installs, and ongoing install planning.
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