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SECMP0056 Initial Modification Report

About this document

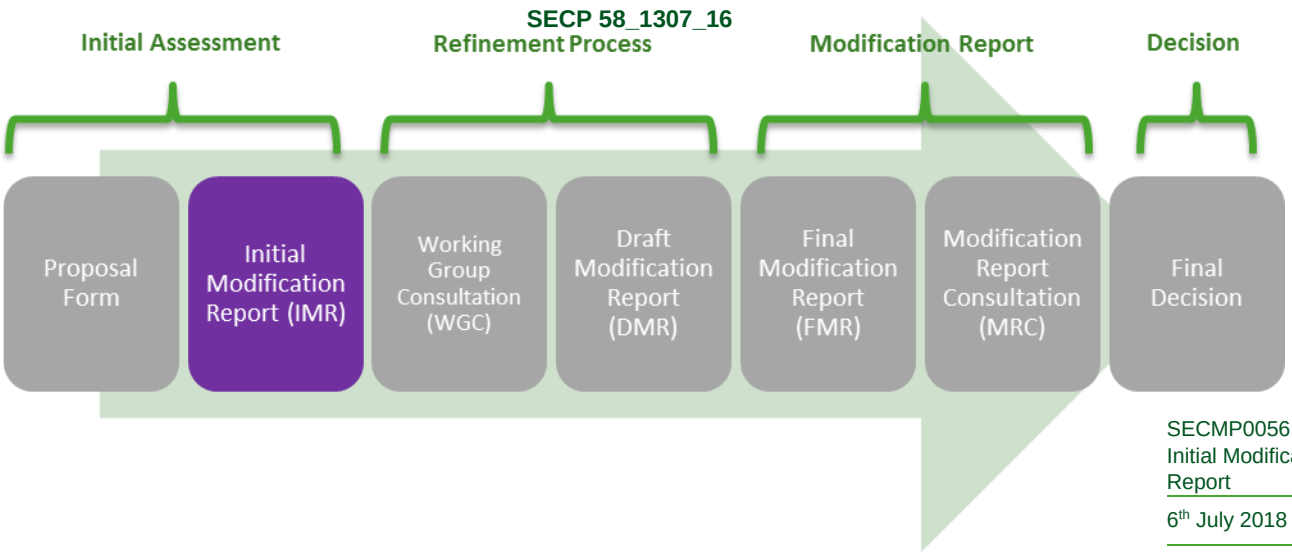
This Initial Modification Report (IMR) contains our initial assessment of SECMP0056 'IHD / PPMID Zigbee Attributes Available on the HAN'. It also provides information on the issue, the Proposer's solution, potential impacts, costs and proposed progression.

This document is submitted to the Smart Energy Code (SEC) Panel for consideration to determine how this Modification Proposal should be progressed through the Modification Process.

As part of this document the Panel will be invited to:

- **AGREE** that this modification should be submitted into the Refinement Process to be assessed by a Working Group;
- **AGREE** the Working Group Terms of Reference;
- **AGREE** the progression timetable set out in Section 5; and
- **AGREE** that SECMP0056 should be progressed as a Path 2 Modification Proposal.

Where are we in the process?



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Smart Energy Code

SEC
Smart Energy Code

Stage 01: Initial Modification Report

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
► 04	Decision

SECMP0056:

IHD / PPMID Zigbee Attributes Available on the HAN

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Summary

Currently under the SEC, SMETS2 Type 1 and Type 2 devices (specifically In-Home Displays (IHDs) and Prepayment Interface Devices (PPMIDs), notwithstanding Consumer Access Devices (CADs)) are not notified of a Change of Tenancy (COT) or Change of Supplier (COS) event. This could allow a new tenant to access the previous tenant's personal information and place the Supplier in breach of the General Data Protection Regulation (GDPR).

Proposed Progression

P2

3 Months

This Modification Proposal is recommended to be:

- progressed as a Path 2: Authority Determined Modification Proposal; and
- progressed through the refinement process for three months.

Potential Impacts

!

- Large Suppliers, Small Suppliers and Other SEC Parties
- There are no impacts on DCC Central Systems

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About this Document

This is an Initial Modification Report (IMR). This document contains details of the issue, solution, potential impacts and costs as well as the proposed progression for SECMP0056.

This document has one attachment:

- Attachment A contains the SECMP0056 Modification Proposal Form.

The Panel will consider this IMR at its meeting on 13th July 2018 and determine how this modification should be progressed through the Modification Process.

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1. Summary

What is the issue?

Currently under the SEC, SMETS2 Type 1 and Type 2 devices (specifically IHDs, PPMIDs, notwithstanding CADs are not notified of a COT or COS event. This could allow a new occupant to access the previous occupant's personal information and place the Supplier in breach of the General Data Protection Regulation (GDPR).

What is the Proposed Solution?

The Proposer seeks to make the appropriate Zigbee attributes available to IHDs/PPMIDs on the Home Area Network (HAN) as is currently the case in SMETS1. Using either the COT/COS Command or Attributes will allow the IHDs/PPMIDs to do a full rewind/data refresh for the given meter(s) at the implementation time, ensuring the IHD will only show data from that time onwards.

Potential impacts

Party

Large Supplier Parties	X	Small Supplier Parties	X
Electricity Network Parties		Gas Network Parties	
Other SEC Parties	X		

System

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

Potential implementation costs

We believe that the cost to implement SECMP0056 will be made up of SEC time and effort. However, the total estimated cost to deliver this modification will be determined as part of the Working Group's assessment.

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Proposed progression

We recommend that this modification is progressed to the Refinement Process for a three-month assessment by a Working Group.

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2. What is the issue?

What is the current situation?

Currently under the SEC, SMETS2 Type 1 and Type 2 devices (specifically IHDs and PPMIDs, notwithstanding CADs are not notified of a COT or COS event. This would potentially allow a new occupant to access the previous occupant's personal information via the IHD or other connected devices.

Under SMETS1, COT and COS are Zigbee attributes that are available to IHDs and PPMIDs on the Home Area Network (HAN). Via the corresponding Service Requests, the Gas Proxy Function (GPF) and Electricity Smart Metering Equipment (ESME) are notified of a COT or COS and do not display data prior to this event. In SMETS1 the Zigbee attributes available to connected devices on the HAN allow devices to also be notified of COT or COS and so these do not display data prior to these events.

The current SMETS2 arrangements require IHD and PPMID manufacturers to rely on being able to derive if there has been a COT or COS event in an inconsistent and unreliable manner (e.g. a long period of non-usage, which is not a reliable indicator of a COT, a COS or a simultaneous COT and COS).

What is the issue?

The Zigbee attributes covering COT and COS were not included in the SMETS2 specification. As a result, connected devices using the SMETS2 specifications could display data prior to a COT or COS, allowing a new occupier to view the previous occupier's personal data. Giving people other than the original occupier access to their data at anything more granular than monthly would constitute a breach of the GDPR; these SMETS2 devices could potentially provide this data at a half-hourly level. This modification has been raised ensure Suppliers can comply with GDPR.

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3. Solution

Proposed solution

The Proposer proposes making the appropriate Zigbee attributes that prevent devices from displaying data from before a COS or COT currently available to IHDs and PPMIDs on the HAN under SMETS1 available to these devices under SMETS2.

The technical changes the Proposer believes needs to be made to deliver this change are as follows:

- COT information would come from the device management cluster:
  - The COT command used is “GetChangeofTenancy()” h00, with the proper response being “PublishChangeOfTenancy” h00, or a default response with status h8B (not found).
  - If the “GetChangeOfTenancy” command is unsupported then IHDs and PPMIDS could fall back to using the attributes “TenancyChangeControl” h201 and “ChangeofTenancyUpdateDate/Time” h200
  - Using either the COT Command or Attributes will allow the IHDs and PPMIDs to do a full rewind or data refresh for the given meter(s) at the implementation time, hence only showing data from that time forward.
- COS information would also come from the device management cluster:
  - The COS command used is “GetChangeofSupplier()” h01, with the proper response being “PublishChangeOfSupplier” h01, or a default response with status h8B (not found).
  - If the GetChangeofSupplier command is unsupported then IHDs and PPMIDs can fall back to using the attributes “SupplerChangeControl” h113 and “SupplierChangeWhen/Time” h112, with “ProposedProviderContactDetails” h114, “ProposedProviderName” h111 and “ProposedProviderID” h110 if “SupplierChangeWhen/Time” changes.
  - Also, for ESME LowMediumThreshold h400 and MediumHighThreshold h401 would be used.

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Views against the General SEC Objectives

The Proposer believes that this Modification Proposal better facilitates General SEC Objectives (a) and (f).

- **Objective (a)[1]:** This will improve the efficient operation of Smart metering as the system will continue to provide data but would only provide data that is relevant to the current consumer at a premise.
- **Objective (f)[2]:** This modification will ensure that GDPR compliance is achieved by ensuring data about one customer is not made available to another customer, and so would facilitate customer satisfaction with respect to privacy and GDPR.

For the avoidance of doubt, the Proposer believes that this modification is neutral against all other Objectives.

[1] Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.
[2] Ensure the protection of Data and the security of Data and Systems in the operation of this Code.

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4. Potential Impacts

The following section sets out the initial assessment of likely impacts and costs should SECMP0056 be approved and implemented. Additional impacts and costs may be identified by the Working Group as part of the Refinement Process.

SEC Party impacts

Large Supplier Parties	x	Small Supplier Parties	x
Electricity Network Parties		Gas Network Parties	
Other SEC Parties	x		

Suppliers and manufacturers will need to ensure devices are built to the new specifications to ensure continuing GDPR compliance in SMETS2 environment.

Central System impacts

DCC Systems		Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

There are no central system impacts anticipated.

Testing

As no central systems are affected no testing is expected to be needed.

SEC and Subsidiary Document impacts

This solution will require amendments to the following documents

- SEC Schedule 8 - GB Companion Specification
- SEC Schedule 9 - SMETS2
- SEC Schedule 10 – CHTS

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Impacts on other industry codes

No other code impacts anticipated.

Greenhouse Gas Emission impacts

No impacts anticipated.

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5. Proposed Progression

Modification Path

We and the Proposer recommend that SECMP0056 be progressed as a Path 2: Authority Determined Modification Proposal, as it will have material impacts on Suppliers and on manufacturers of Smart meters, IHDs, PPMIDs and other CADs.

Consideration of Urgency

The Proposer notes that the issue of compliance with GDPR is now an on-going issue, as SMETS2 devices that could display a previous occupant's data to a new occupant are being constructed and installed. As such, they believe that this issue needs to be resolved as quickly as possible.

The Proposer has not formally requested that SECMP0056 be an Urgent Proposal; however, they have asked that the Panel consider whether this modification should be granted Urgent status. If the Panel does then, in accordance with SEC Section D4.5, it can request the Authority (in this scenario, Ofgem) directs that SECMP0056 to be an Urgent Proposal, and recommend to the Authority the process and timetable that should be directed if Urgent status is granted.

If a modification is granted Urgent status, it can progress through whatever process and timetable is deemed necessary to reach a decision. However, if a request for Urgent status is made and the Authority rejects this request then, in accordance with SEC Section X2.3(c), the modification would be cancelled and not progressed further.

Ofgem has stated that, in considering a request for Urgent status, it would look at whether the proposal is linked to an imminent or current issue that if not urgently addressed would:

- cause significant commercial impact on Parties, consumers or other stakeholder(s);
- would have a significant impact on the safety and security of the electricity and/or gas systems; or
- would cause a Party to be in breach of any relevant legal requirements,

although all requests are considered on a case-by-case basis and on their own merits.

We believe that this modification could be progressed quickly through the standard process to the timetable below.

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Proposed progression

We recommend the following progression timetable for Panel consideration.

Activity	Date
Modification Proposal raised	04 Jul 18
IMR presented to Panel	13 Jul 18
First Working Group meeting	W/B 30 Jul 18
Second Working Group Meeting (if required)	W/B 13 Aug 18
Working Group Consultation	31 Aug 18 – 21 Sep 18
Panel reviews Modification Report	12 Oct 18
Modification Report Consultation	15 Oct 18 – 05 Nov 18
Change Board vote	21 Nov 18
Modification Decision by the Authority *(Path 2 only)*	Late Dec 18

If the second Working Group meeting is not required, we would be able to issue the Working Group Consultation sooner, which may allow for the Draft Modification Report to be presented one month earlier in September 2018.

If the Panel considers urgency, we recommend the same approach as above except to not issue the Modification Report Consultation and instead for the Panel to pass the Modification Report directly to the Change Board to vote. Ad-hoc Panel and Change Board meetings could also be convened to allow consideration of the Modification Report sooner.

Refinement length

We recommend that this modification is submitted for a three-month Refinement and assessment by a Working Group. This three-month timeframe will allow for:

- a full Working Group assessment to take place (approx. one to two Working Group meetings); and
- One 15 Working Day industry consultation to be issued and reviewed.

For a more detailed progression plan please see Appendix 1.

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Working Group

Membership

We recommend that the SECMP0056 Working Group be made up of individuals with expertise in SMETS Technical Specifications, IHD manufacturers, Communications Hub manufacturers and any other interested parties.

Terms of Reference

At this point we believe the standard Working Group Terms of Reference questions will be sufficient to fully assess the Modification Proposal.

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6. Recommendations

The Panel is invited to:

- **AGREE** that this modification should be submitted into the Refinement Process to be assessed by a Working Group;
- **AGREE** the Working Group Terms of Reference;
- **AGREE** the progression timetable set out in Section 5; and
- **AGREE** that SECMP0056 should be progressed as a Path 2 Modification Proposal.

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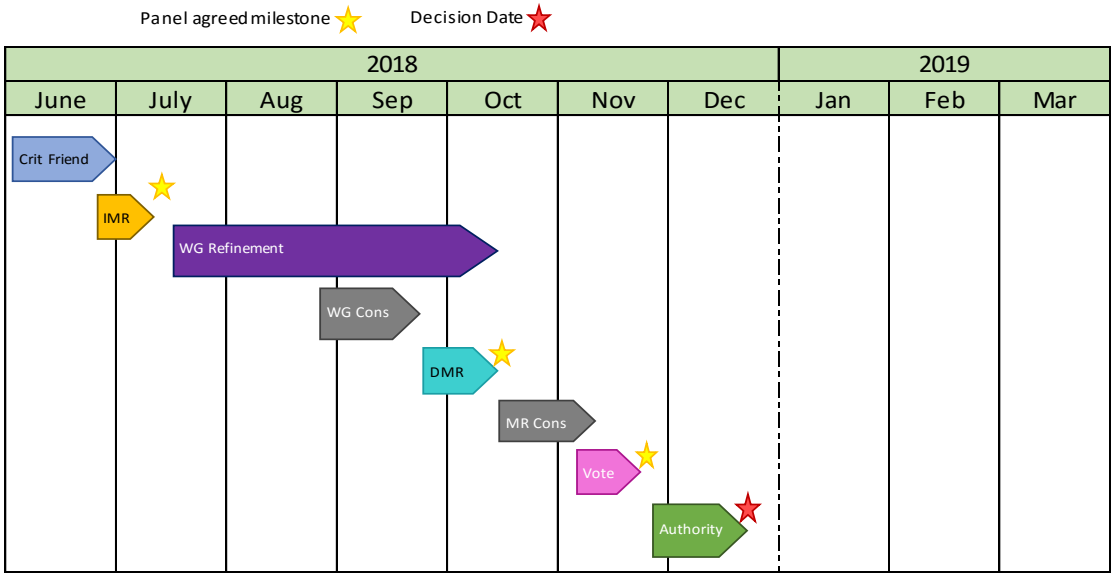
Appendix 1: Detailed Progression Plan

Please note that the progression plan shown below is subject to change



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Appendix 2: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Defined Term
CAD	Consumer Access Device
COT	Change of Tenancy
COS	Change of Supplier
DCC	Data Communications Company
ESME	Electricity Smart Metering Equipment
FMR	Final Modification Report
GDPR	General Data Protection Regulation
GPF	Gas Proxy Function
HAN	Home Area Network
IHD	In-home Display
IMR	Initial Modification Report
Ofgem	The Office of Gas and Electricity Markets
PPMIDs	Prepayment Interface Devices
SEC	Smart Energy Code
SMETS	Smart Metering Equipment Technical Specifications

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