Smart Energy Code

SEC
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SEC Modification Proposal Form

Mod Title

IHD / PPMID Zigbee Attributes Available on the HAN

Submission Date

5th July 2018

Details of Proposer	
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1. What issue are you looking to address?

Currently under the SEC, SMETS 2 Type 1 and Type 2 devices (specifically In-Home Displays (IHDs) and Prepayment Interface Devices (PPMIDs), notwithstanding CADs) are not notified of a Change of Tenancy (COT) or Change of Supplier (COS) event. Potentially allowing a new tenant to access the previous tenant's personal usage data.

The current 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

2. Why does this issue need to be addressed? *(i.e. Why is doing nothing not an option?)*

With recent changes to data protection rules under the General Data Protection Regulation (GDPR) a more robust and substantial mechanism needs to be put in place to ensure compliance. This modification will make it possible for Suppliers to comply with GDPR and provide confidence and assurance to consumers that their data is secure and cannot be seen by others on a device they have no control over.

This issue was initially raised by IHDL to the Department of Business, Energy and Industrial Strategy (BEIS) and was discussed at the Technical Specification Issue Resolution (TSIRs) sub group. Although there was no agreement reached that the current technical specification is defective (due to the exclusion of the required Zigbee attributes) it was agreed that the most sensible approach going forward would be to implement a workaround until a SEC Mod could be implemented to add the attributes needed to notify an IHD and PPMID of a COT or COS to specifications.

It was also agreed that the identification of a COT or COS must be explicit and achieved simply and in a straightforward manner that is consistent across all devices. That is not currently possible. Please note this differs to the SMETS1 solution which includes the Zigbee attributes but, for reasons unknown, they've not been carried across into the associated technical requirements for SMETS2.

3. What is your Proposed Solution?

We propose making the following Zigbee attributes available to IHDs/PPMIDs on the HAN as is currently the case in SMETS1:

- COT information comes 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/PPMIDS could fall back to using the attributes "TenancyChangeControl" h201, "ChangeofTenancyUpdateDate/Time" h200
- Using either the COT Command or Attributes will allow the IHDs/PPMIDs to do a full rewind/data refresh for the given meter(s) at the implementation time, hence only showing data from that time.
- COS information also comes from the device management cluster.

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- 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 can fall back to using the attributes "SupplierChangeControl" h113, "SupplierChangeWhen/Time" h112 with "ProposedProviderContactDetails" h114, "ProposedProviderName" h111, & "ProposedProviderID" h110 if "SupplierChangeWhen/Time" changes.
- Also for ESME LowMediumThreshold h400, MediumHighThreshold h401

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, therefore only showing data from that time.

4. What SEC objectives does this Modification better facilitate?

It is believed this Mod better facilitates SEC Objectives (a)[1] and (f)[2] for the following reasons:

- Objective (a): 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; and
- Objective (f). 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.

5. What is the requested Path type?	Path 2

This Mod will have a material effect on data security and privacy and requires a change to the technical specifications to deliver the solution.

6. Are you requesting that the Modification Proposal be treated as Urgent?	TBC

We are requesting the Panel advise on Urgency

7. What is your desired implementation date?

[1] Objective (a) is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.
[2] Objective (f) is to ensure the protection of Data and the security of Data and Systems in the operation of this Code.

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Due to the nature of the issue being addressed, sooner rather than later.

8. Which SEC Parties are expected to be impacted? (Please mark with an X)

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

The change being raised will require a change to the specifications and the devices currently being produced and procured by Users although it is thought this will not impact Network Parties directly,

9. Which parts of the SEC will be impacted?

SMETS2 & GBCS (impact to GBCS needs validation as the zigbee in question already exists in the solution although it needs to be on the HAN as well as just on the ESME and GPF.)

10. Will there be an impact on Central Systems? (Please mark with an X)

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

Not know at this stage. It is to get attributes published on the HAN by the ESME. That 'should' have no impact to the overall system directly.

11. Will there be any testing required?

Yes, between device manufacturers – ESME and IHD / PPMID. It is not understood if DCC will need to carry out any and should be highlighted in an PA they carry out.

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12. Will this Modification impact other Energy Codes?	No
No impacts on any other Codes anticipated.	
13. Will this Modification impact Greenhouse Gas Emissions?	No
There are no impacts on Greenhouse Gas Emissions anticipated.	

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