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SEC Panel Sub-Committee Report

1. Purpose

This paper provides the Panel with an update on recent activities from the Panel Sub-Committees. It highlights the key issues discussed and details specific points the Sub-Committees would like to bring to the Panel's attention.

2. Operations Group

2.1 DCC reporting

Report	Delivery per SEC	Content	Observations
Performance Measurement Report July18	On Time SEC H13.4 – Monthly 25 working days following end of month.	Per SEC H13.1. & L8.6	All Code Performance Measures, the Data Service Provider (DSP) and the Communication Service Providers (CSPs) reported above Target. Communication Hub deliveries in the North reported as 25% on time, for which no description of the delays and missed dates were provided by the DCC. Ops Group Members reported some outages in July not showing in report. The DCC were actioned to investigate and report back to Ops Group.
DCC Responsible Communications Hub Returns Report Quarterly report. Nothing to review this month	SEC F9.15– Quarterly. The SEC does not prescribe when after end of quarter, the report is provided.	n/a	n/a
DCC Network Enhancement Report (Network Enhancement Plans - NEP) Quarterly report. Nothing to review this month	SEC F7.21 “within a reasonable period of time following each quarter that ends prior to 1 January 2021”.	n/a	n/a

Report	Delivery per SEC	Content	Observations
Registration Data Provider (RDP) Incident Report August 2018	On Time SEC Appendix AG 2.5.10 – Monthly - timing not specified.	Per SEC Appendix AG. 7 Incidents opened and resolved in the month.	Five open incidents reported unresolved. One has since been resolved. The remaining four are all now over one month old. The DCC is pursuing the RDP.
Certificate Signing Request (CSR) Variance Report – August 2018	Received one Working Day late SEC L8.9 – 10 th Working Day following month end.	Per SEC L8.9(a), 407,397 requests were sent versus a forecast of 868,301	None
Service Request (SR) Variance Reporting – August 2018	Received on time. SEC H3.24 – 10 th working day of month	Per SEC H3.24. 1,209,004 requests were sent versus a forecast of 7,004,230	None
Quarterly Problem Report Quarterly report. Nothing to review this month	Per SEC Appendix AG Quarterly specific timing not specified within Appendix AG.	Clause 3.2 Appendix AG	n/a

2.2 Ops Group Meeting Highlights

Planned Maintenance

Ops Group members again repeated their request for, and frustration at the time it is taking, DCC to provide an overall consolidated view of all Planned Maintenance activities. The lack of such a view is causing operational difficulties. The latest Temporary Planned Maintenance request was discussed, with the Chair asking for any material views from the Ops Group to feed into the Panel decision.

Incident Categorisation.

Following concerns raised at Ops Group and SMDG, SECAS presented a review of Category 2 Incidents in July. It was noted that there is a level of subjectivity when it comes to interpreting what qualifies as a Category 1 Incident. Several Supplier members suggested that any Incident which has a “critical adverse impact” qualifies as a Category 1 Incident, and emphasised that at present any impact on Installation and Commissioning has potential for “critical adverse impact”. The Ops Group also noted that communications of Incidents are inconsistent, some being of poor quality.

Major Incident

The Ops Group members considered the Major Incident Review Report for INC000000294975 'Intermittent issues impacting GSME and ESME installations'. The Ops Group provided feedback to the DCC and requested amendments be made prior to agreeing to publish to all SEC Parties the Review and Summary reports for this Incident.

CSP North Issues

The DCC gave a verbal update to the Ops Group on issues impacting the rollout in the North. Ops Group members noted that there are still problems in the CSP North region, preventing ramp up of installs for this region, with no clear timescale for resolution.

Incorrect Network Operator Certificates

A question was raised as to which Party should correct an erroneous certificate on a meter. Currently, only the erroneously named Distribution Network Operator (DNO) can do this, but there are no SEC requirements that they do¹. It was also reported that some DNOs are finding that their DCC Adaptor is potentially preventing this from happening. The Ops Group understands SMKI PMA is investigating with DNOs and DCC.

Mesh Installations

The DCC has reported instances of an incorrect Communication Hub installation in regions where a mesh Wide Area Network (WAN) Variant Communication Hub should have been installed in compliance with the Communication Hub Installation and Maintenance Support Materials (CHIMSM). This raises a broader question of compliance with the SEC. The Ops Group will be returning to this topic in October.

3. Security Sub-Committee and SMKI PMA

3.1 Assurance Status Decisions

The Security Sub-Committee (SSC) set two assurance statuses in September 2018.

3.2 Verification Assessment

As part of their wider obligations, the SSC review the outcomes of Verification Assessments. If the SSC believe that a User is non-compliant, or potentially non-compliant, with obligations contained in SEC Sections G3-G6, then they notify the Panel. During September 2018, the SSC reviewed one Verification Assessment. Details can be found in the confidential Appendix A.

3.3 Director Letters

The SSC reviewed two Director's Letters in September 2018. One showed there were no non-compliances to prevent the User in question beginning to use DCC Live Systems, and the other was requested to take further steps prior to using DCC Live Systems. Details can be found in confidential Appendix A.

¹ [SECMP0063 'Ensuring correct Network Operator Certificates are placed on Electricity Smart Meters'](#) was raised on 2 October 2018.

3.4 SSC Highlights

SEC Obligations relating to SMETS1

The SSC have been considering the SMETS1 SEC obligations issue that was raised at the September Panel meeting; the issue relates to the implementation of SEC Version 5.20 and changes to SEC Section G3.26 – G3.28 obligations, which now requires the User CIO to assess whether SMETS1 Smart Metering Systems are secure to an appropriate standard. The implication is that by aggregating the volume of SMETS1 and SMETS2 Devices, several energy Suppliers will be subject to a Full User Security Assessment when they have been expecting either a Verification Assessment or a Self-Assessment.

At the SSC meeting on 26th September 2018, BEIS confirmed that they are drafting SEC changes to ensure that these obligations only apply to enrolled SMETS1 Devices. The SSC agreed to raise an urgent SEC modification to achieve the changes once the revised legal drafting had been agreed.

SMETS1 Device Assurance

SSC members attended a workshop on 25 September 2018, where PA Consulting, who have been appointed to undertake work on SMETS1 Device assurance, presented the SSC with potential options for SMETS1 Device Assurance.

The group considered and approved a SMETS1 Device Assurance questionnaire, which was distributed to Supplier Parties' lead contacts, to obtain evidence of good practice and enable the SSC to issue guidance in the Security Controls Framework on what constitutes an 'Appropriate Standard' since this is currently not defined in the SEC.

SSC Risk Assessment

SSC members attended a workshop on 25 September 2018 to discuss the seventh iteration of the SSC Risk Assessment, an updated Security Requirements document and the Risk Treatment Plan which identifies the residual risks following the implementation of security controls.

SMKI Device Certificates

The SSC have agreed to work with the DCC to develop guidance that clarifies the position for Device manufacturers, following confusion from manufacturers who have requested SMKI Device Certificates directly from the DCC, as this arrangement is currently prevented by the SEC. The SSC endorsed the DCC's refusal to issue directly to manufacturers which is currently prevented by the SEC.

3.5 SMKI PMA Highlights

The SMKI PMA considered a request from the DCC to deal with an operational problem that was preventing the installation of around 4,700 Devices, the bulk of which were for a Large Supplier, and this had stalled their SMETS2 rollout. The SMKI PMA identified a potential solution and directed the DCC accordingly. The SMKI PMA Chair provided a detailed explanation to the SEC Panel Chair.

The SMKI PMA carried out a Recovery Scenario Exercise, as defined in SEC Section L10 which sets out the procedures and steps to be followed via SEC Appendix L.

The group agreed to undertake a similar exercise with volunteer Suppliers who are not as accustomed to SMKI as the PMA members, to see how they would deal with the situation in real life rather than our scenario exercise (which follows what should happen rather than what will happen). It was suggested that the Operations Group might be a source of willing volunteers to participate in

such an exercise; there was general support from the Operations Group when the matter was raised at its meeting on 25 September 2018.

4. Technical Architecture and Business Architecture Sub-Committee (TABASC) and Testing Advisory Group (TAG)

4.1 TABASC Highlights

TABASC received an update from the DCC and Ofgem on development of the Central Switching Service (CSS) and DSP Registration Data Interface to improve customers experience of switching. The TABASC considered if it was economical to maintain existing outbound Registration Data Provider (RDP) links to convey data to RDPs, or whether the information should be conveyed via the CSS. The TABASC also discussed the introduction of a further source of address data and the implications this may have on Smart Metering.

In addition, TABASC discussed the proposed throttling mechanism associated with Traffic Management and provided its views on the distribution of loads across the system. It requested that the DCC consider dynamic load calculations for the calculation of System Capacity.

4.2 TAG Highlights

TAG met to discuss and provide feedback on the DCC's proposed changes and defect fixes to the User Interface Testing (UIT) B environment ahead of the Release 2.0 Go Live. TAG noted that it does not have a role in agreeing or adjusting the scope of a Release. Any changes formally agreed should remain in scope, and any changes not formally agreed should not be introduced.

TAG is scheduled to meet on 10 October 2018 to consider the Live Service Criteria evidence and any outstanding defects from testing, and consideration of go live on existing live services. The output from the meeting will form a recommendation paper for the Panel to consider at its ad-hoc meeting on 19 October 2018.

5. Recommendations

The Panel is requested to **NOTE** the content of this paper.

Hollie McGovern

SECAS Team

5 October 2018

Attachments:

Appendix A – Security Assurance Status Update (RED)