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Stage 04: Modification Report Consultation Responses

SECMP0009 'Centralised Firmware Library'

What stage is this document in the process?

| | |
|------|---------------------|
| 01 | Initial Assessment |
| 02 | Refinement Process |
| 03 | Modification Report |
| ▶ 04 | Decision |

About this document

This document contains the collated responses to the SECMP0009 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Nikki Olomo on 020 7081 3095 or email SEC.Change@gemserv.com.

SECMP0009

Working Group
Consultation
Response Form

6th September 2018

Version 0.1

Page 1 of 16

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Content

| | |
|----------------------|----|
| Summary of Responses | 3 |
| Question 1 | 4 |
| Question 2 | 7 |
| Question 3 | 9 |
| Question 4 | 12 |
| Question 5 | 14 |

About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0009.

The Change Board will consider these responses at its meeting on 19th September 2018, where it will determine whether SECMP0009 should be approved by the Authority.

SECMP0009

Modification Report
Consultation
Responses

6th September 2018

Version 0.1

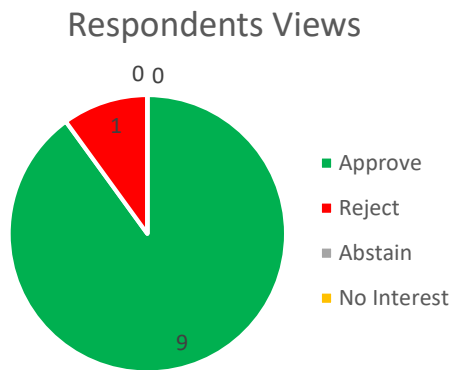
Page 2 of 16

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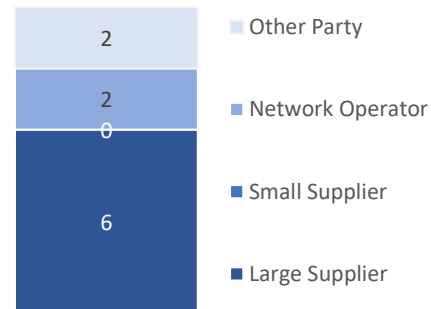
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Summary of Responses

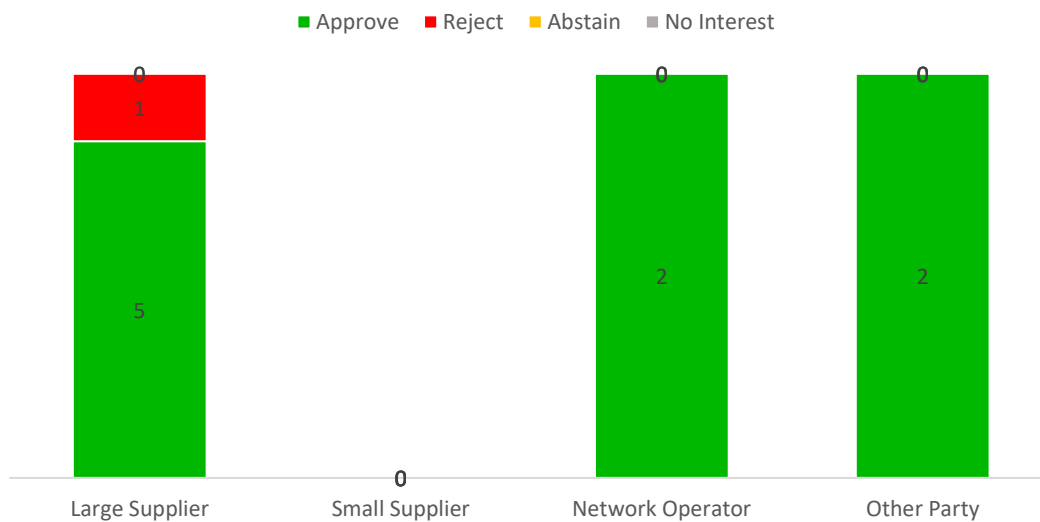
This section summarises the responses received to the SECMP0009 MRC.



**Number of Respondents
(by Party Type)**



Views by Party Type



SECMP0009

Modification Report
Consultation
Responses

6th September 2018

Version 0.1

Page 3 of 16

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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?

| Party Name | Party Category | Yes/No/ Neutral | Comments |
|----------------------------|------------------|---------------------|---|
| Western Power Distribution | Network Operator | Yes | We believe that this modification better facilitates SEC Objective (a) as it will facilitate efficient operation of Smart Metering Systems at Energy Consumers' premises. |
| SSEN | Network Operator | Yes | SSEN believe this solution better facilitates the SEC Objectives General SEC Objectives (a), (c), (d) and (f) and should be approved |
| EON | Large Supplier | Yes | <p>We agree that the proposed solution better facilitates objective d by allowing new entrants visibility of details pertinent to all relevant manufacturers (the value of this however will depend upon the details provided, the manufacturer is already communicated within Industry flows during the CoS process).</p> <p>We further agree that the solution proffered retains the security of Firmware data (images and release notes) and thus poses no negative impact to objective f.</p> <p>The current solution does not provide Firmware to Parties as was envisaged in the intent of this Modification, thus we believe that the current solution does not directly facilitate any other objective.</p> |
| Security Sub-Committee | Other | Yes- with condition | We believe that the modification report should clarify whether or not an initial draft of the FIR will contain information relevant to existing CPL entries, and if so, what process will be utilised for the completion of this initial draft |

SECMPO009

Modification Report
Consultation
Responses

6th September 2018

Version 0.1

Page 4 of 16

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|---------------|----------------|-----|---|
| EDF | Large Supplier | Yes | <p>We believe that the proposed solution better facilitates SEC Objectives (a), (d) and (f), for the following reasons:</p> <p>a) While the proposed Firmware Information Repository does not provide direct access to the firmware images that Suppliers may require, it should make it easier for Suppliers (especially new or smaller Suppliers) to identify how those firmware images can be obtained.</p> <p>(d) The proposed solution would help gaining Suppliers to maintain devices, giving consumers the confidence that they will switch Supplier without the functionality of their devices being negatively impacted.</p> <p>(f) Enabling Suppliers to more easily identify and obtain up to date firmware will ensure that the risk that devices continue to run on insecure versions of firmware is reduced.</p> <p>However we note that these objectives will only be better facilitated if the Firmware Information Repository is populated consistently and managed effectively, purely creating the Firmware Information Repository will not achieve these outcomes.</p> |
| First Utility | Large Supplier | Yes | <p>This proposal better facilitates SEC Objective a. It provides an effective and efficient operation for Suppliers to view smart metering asset information in a centralised library and ultimately aiding the Change of Supplier process.</p> |
| N Power | Large Supplier | Yes | <p>As a supplier you want to know what the latest version of firmware is. firmware updates will include security updates and this will be essential in safeguarding devices/data and is a fundamental requirement for the customer experience, GDPR and for the CoS process and therefore meets SEC objectives we have outlined within the modification i.e. a, c, d and f</p> |
| SSE | Large Supplier | Yes | <p>We agree that the proposed solution could be viewed to better facilitate SEC Objective (a) regarding the operational aspects for managing Smart Metering Systems firmware and would be more efficient for all Suppliers in being able to identify the relevant Manufacturers and their contact details.</p> |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 5 of 16

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| | | | We believe the proposed solution is neutral against SEC Objectives (c), (d) and (f). |
| Itron Metering Solutions | Other | Yes | The proposed solution facilitates General SEC Objective (a) for the operation of Smart Metering systems, (d) for effective competition, and (f) for the security of Data and Systems. |
| Utilita | Large Supplier | No | <p>The proposal has been downgraded to the point where it no longer seems beneficial. Approval of this modification will make it appear as if Suppliers now have new tools with which to fulfil their obligations, in reality it changes very little. This spreadsheet achieves little that entering a manufacturers name into a search engine would not.</p> <p>The CPL already contains a Manufacturer ID (with associated plain English lookup table) and a full hash of each firmware image. It is hard to see what the new proposal will provide beyond this, other than contact details. Provision of contact details by manufacturers should not require a formal modification. Given that no new obligations can be placed on Manufacturers, it is unclear how this Modification changes things.</p> |

SECMPO009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 6 of 16

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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0009 should be approved?

| Party Name | Party Category | Yes/No | Comments |
|----------------------------|------------------|---------------------|---|
| Western Power Distribution | Network Operator | Yes | We believe that this modification will provide a valuable resource going forward as the market develops. As new firmware is released and Customers change Supplier's it will aid the efficient operation of Smart Metering Systems and ensure that Suppliers can get the firmware required. The costs are low and concerns around security of firmware being highly available have been addressed. |
| SSEN | Network Operator | Yes | Any improvement to the overall SEC obligations management is welcome |
| EON | Large Supplier | Yes | We believe that this may be the first step toward the general dissemination of Firmware to Supplier Parties. We note however that should this modification be implemented, we would expect to see a review of this solution at some point post-implementation with a view to disregarding the spreadsheet if it is proving to provide no value, such that Parties are not paying for the maintenance of a spreadsheet that is not delivering Industry benefit. |
| Security Sub-Committee | Other | Yes- with condition | Yes, but only if the security concerns expressed by the SSC are addressed and the recommendations implemented. If the information in the spreadsheet exposes security vulnerabilities that can be used for malicious purposes, then the User is responsible under SEC Section G3.9 for the rectification of that vulnerability which could have been avoided by simple vetting of the content by SECAS. |
| EDF | Large Supplier | Yes | Given the low cost of this change relative to the potential benefits, we agree that SECMP0009 should be approved. |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 7 of 16

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| First Utility | Large Supplier | Yes | The benefits far outweigh the costs of implementing this change proposal. |
| N Power | Large Supplier | Yes | Yes, as a supplier we have a duty and a responsibility to ensure a positive customer experience whilst safeguarding the security of their data. This modification will enable suppliers regardless of their size, to ensure this happens in a more efficient and effective manner. |
| SSE | Large Supplier | Yes | In spite of the limitations of this modification when compared to the original intent of the proposal, we feel there would still be a benefit in introducing the Firmware Information Repository, and costs for this solution are minimal. |
| Itron Metering Solutions | Other | Yes | Yes. The proposed solution will only impact our organisation because of ongoing maintenance of the information to be provided to the Firmware Information Repository. |
| Utilita | Large Supplier | Neutral | We note the significantly reduced costs in comparison to the expectations within the initial proposal. We still believe the modification as presented is unnecessary. |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 8 of 16

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Question 3

Q3: Do you agreed that draft legal text changes deliver the intention of the modification?

| Party Name | Party Category | Yes/No | Comments |
|----------------------------|------------------|---------|--|
| Western Power Distribution | Network Operator | Neutral | With regards to the draft legal text we feel that others will be better positioned to comment. |
| SSEN | Network Operator | Neutral | - |
| EON | Large Supplier | No | <p>The modification report makes no mention of the Panel being involved in this process and yet the legal text refers to the spreadsheet being established and maintained by them. We believe it would be more accurate for the text to convey that this spreadsheet will be set up and maintained by the Code Administrator (akin to the text in SEC Sections C and D etcetera).</p> <p>We are concerned with the iteration of 'mandatory' within F2.15; this is entirely voluntary for manufacturers, and so we would question how the Panel or Administrator may 'ensure' the content of 'mandatory' fields. We feel that the legal text needs to convey the voluntary nature of the completion of this spreadsheet such as to minimise any risk to the fulfilment of these obligations.</p> <p>Our largest concern with the proposed legal text is that F2.17 places an obligation on the Party or any other person submitting details for CPL entry to provide the details required for the Firmware Information Repository (FIR). Neither Section F2, nor Appendix Z details any responsibility for any Party to provide details for CPL entry. With the exception of the Hash and additional models under the same CPA Certificate, the obligations currently extend solely to the Panel and the establishment and maintenance of CPL, with Party involvement only being pertinent to the</p> |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 9 of 16

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| | | | removal of entries from the CPL (Appendix Z 6.2). This obligation is further at odds with F2.15(c) wherein it is noted that the provision of data is at the discretion of the manufacturer, who may or may not be a SEC Party and therein bound or not by these obligations. Where the obligations concerning the Hash of the manufacturer image or to additional models under the same CPA Certificate being uploaded onto the CPL are relevant, F2.17 would obligate either the DCC or the Supplier Party to provide the details required for the FIR. The DCC and/or Supplier Party does not own the data required by the FIR and may not therefore be able to fulfil these obligations, especially where the intent of the modification and the corresponding legal text (F2.15(c)) permit these to be at the discretion of the manufacturer. To clarify, we do not believe it appropriate for a SEC obligation to be placed on Suppliers to provide mandatory data for the FIR that is at the discretion of manufacturers (free-text field), when uploading a CPL entry that adds a Device Model to an existing CPA Certificate, or when adding the Hash |
| Security Sub-Committee | Other | Yes- with condition | Yes. The draft legal text is unaffected by the SSC recommendations. |
| EDF | Large Supplier | Yes | <p>While we agree draft legal text changes deliver the intention of the modification we note that a number of comments were made in response to the Working Group Consultation which do not seem to have been addressed. For example, a reference to 'Information Repository' rather than 'Firmware Information Repository' (which is the defined term) remains.</p> <p>While these may not be material changes we believe that the comments noted by ourselves and other Parties should be addressed, or feedback provided as to why that has not been the case.</p> |
| First Utility | Large Supplier | | The legal text has not been studied in great detail. |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 10 of 16

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|--------------------------|----------------|---------|---|
| N Power | Large Supplier | Yes | - |
| SSE | Large Supplier | Yes | - |
| Itron Metering Solutions | Other | Neutral | No Comment |
| Utilita | Large Supplier | Neutral | The legal text places new obligations on the Panel. However, there is still dependency on manufacturers who do not fall under the remit of the SEC. This modification therefore offers little in terms of solid assurance to Suppliers beyond what already exists in the CPL. |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 11 of 16

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Question 4

| Q4: Do you agree with recommended implementation date? | | | |
|--|------------------|---------------------|--|
| Party Name | Party Category | Yes/No | Comments |
| Western Power Distribution | Network Operator | Yes | We support an implementation date as soon as reasonably practical to ensure benefits can be realised. |
| SSEN | Network Operator | Neutral | - |
| EON | Large Supplier | Neutral | It is not appropriate for Parties to be asked whether they agree with flouting the Release Management Policy; it is for the Panel to determine changes to a Release. For clarity, we would not object to the proposed implementation date if Panel were to approve it. |
| Security Sub-Committee | Other | Yes- with condition | Yes. The implementation date is unaffected by the SSC recommendations. |
| EDF | Large Supplier | Yes | We agreed with the proposed implementation dates. |
| First Utility | Large Supplier | Yes | - |
| N Power | Large Supplier | Yes | - |
| SSE | Large Supplier | Yes | - |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 12 of 16

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|--------------------------|----------------|---------|------------|
| Itron Metering Solutions | Other | No | No Comment |
| Utilita | Large Supplier | Neutral | - |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 13 of 16

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Question 5

| Q5) Do you have any further comments on SECMP0009? | | | |
|--|------------------|---------------------|--|
| Party Name | Party Category | Yes/No | Comments |
| Western Power Distribution | Network Operator | No | - |
| SSEN | Network Operator | No | - |
| EON | Large Supplier | Yes | We believe that the modification report should clarify whether or not an initial draft of the FIR will contain information relevant to existing CPL entries, and if so, what process will be utilised for the completion of this initial draft |
| Security Sub-Committee | Other | Yes- with condition | <p>The published consultation does not fully reflect the recommendations from the SSC and I am instructed by SSC members to formally respond to the consultation to ensure that the Change Board and the Authority are aware of the SSC recommendations which are:</p> <ol style="list-style-type: none"> 1. That the information in the spreadsheet is 'locked' to ensure that the content cannot be manipulated. This is deemed by the SSC to be a simple process that mitigates the risk of malicious activity which could alter the information e.g. to cause confusion or to hide information that Suppliers need to know about. 2. That the spreadsheet is provided only to SEC Parties and is not published to the general public. The SSC notes that the SEC legal drafting refers to informing 'Parties' and can see no value in making the information available more widely. Restricting the publication to SEC Parties mitigates the risk of attackers and hacktivists having ready access to the information. |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 14 of 16

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| | | | |
|---------------|----------------|-----|--|
| | | | <p>That entries are vetted by a SECAS security expert prior to publication to ensure that any sensitive information e.g. about security vulnerabilities, are appropriately worded and that the SSC is properly notified as per SEC Section G3.9(b). The SSC notes that the Working Group considers that manufacturers should be relied on to avoid the inclusion of sensitive information. However, the SSC was informed of real examples of Release Notes containing security sensitive information that have had to be redacted. The SSC considers that a simple review by a SECAS security expert will not delay the publication and is a sensible risk mitigation that will a) prevent the publication of sensitive information and b) ensure that the SSC is made aware of any security vulnerabilities to enable them to meet their SEC obligations to monitor security risks</p> |
| EDF | Large Supplier | Yes | <p>As noted above, while this change creates the obligation to provide information to the stored in the Firmware Information Repository, it does not require this information to be of any specific quality.</p> <p>While we recognise the difficulty in making this a specific SEC obligation in this section more specific, we believe that SECAS need to work with Manufacturers to better understand the sort of information that will be provided, and how this might be made as standardised and useful as possible. Creating a new Firmware Information Repository which contains low quality information is not going to be much (if any) of an improvement over the current SEC baseline.</p> <p>We would also recommend a post-implementation review 6 to 12 months following implementation of this change to understand whether Parties are actually using the new Firmware Information Repository, and what if any issues they are coming across.</p> |
| First Utility | Large Supplier | No | - |

SECMP0009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 15 of 16

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| | | | |
|--------------------------|----------------|-----|---|
| N Power | Large Supplier | No | - |
| SSE | Large Supplier | Yes | We would like to have some clarification on how the information in the repository will be archived. The report emphasises that this repository will help suppliers establish the most recent release, but it is unclear to us whether the repository is intended to hold <i>solely</i> the most recent release, or if with each update the old entries will be kept and archived. |
| Itron Metering Solutions | Other | Yes | We support only the described 'Firmware Information Repository' solution as a way to provide contact information for suppliers who gain meters via customer churn. We do not support the Centralised Firmware Library that is described in the initial SECMOD009 documentation. |
| Utilita | Large Supplier | Yes | Updating the "Zigbee Manufacturer Codes" tab of the "CPL Meter Model mapping to plain English" workbook, to include contact details as described in the legal text, would achieve what this modification appears to now propose. It does not seem as if a formal modification is required to do this; a formal modification was not required to create the initial Zigbee code to Company Name mapping. |

SECMPO009

Working Group
Consultation
Responses

6th September 2018

Version 0.1

Page 16 of 16

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