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SEC Panel Meeting 65

SECP_65_1502, 15 February 2019

10:00 – 13:00, Gemserv, 8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	SEC Panel Members
SEC Panel Chair	Peter Davies
Large Suppliers	Ashley Pocock
	Simon Trivella
Small Suppliers	Carolyn Burns (<i>Alternate for Karen Lee</i>)
	Mike Gibson
Electricity Networks	David Lane
Gas Networks	Leigh Page
Other SEC Parties	Gary Cottrell
	Mike Woodhall
DCC	Ro Crawford

Representing	Other Participants
Ofgem	Michael Walls
BEIS (Secretary of State)	Robert Thornes
	Duncan Stone
DCC	Ben McCauley (Part)

	Alex Henighan (Part)
	David Brown (Part)
Meeting Secretary	Hollie McGovern
SECAS	Abigail Hermon
	Phillip Twiddy (Part)
	Fiona Chestnutt (Part)
	David Kemp (Part)
	David Barber (Part)
	Sarah Gratte (Part)
	Nick Blake (Part) (<i>Teleconference</i>)
	Tim Newton (Part)

Apologies:

Category	SEC Panel Members
Small Suppliers	Karen Lee

1. Minutes and Actions Outstanding

The minutes from the January 2019 SEC Panel meeting were approved ex-committee and circulated. The Panel noted that the majority of actions had been closed, with the outstanding actions on target for completion. The following updates were provided.

Action Reference	Action
SECP59/06	The DCC to provide further information on how it will implement the IRPs that can fit into maintenance releases, including the approach it will take and the associated costs.
The DCC confirmed that since the action was raised, the status of the IRPs has moved on significantly. IRP514 is included in a package of BEIS led changes being managed through Transitional Governance. Current indicative delivery date is Quarter 3 2019. IRP521 has already been implemented into the SEC via GBCS V3.1. Action: CLOSED .	

Action Reference	Action
SECP62/03	SECAS and the DCC to present the Panel with a set of SoLR scenarios, including prepayment and credit mode, for consideration at the December 2018 Panel meeting.
SECAS provided the Panel with an overview of the outputs from a SoLR workshop that took place on 13 February 2019. The Panel requested SECAS to circulate the minutes from the workshop to all SEC Parties, as it is a subject of interest. A new action was raised as a result (SECP65/01). Action: CLOSED .	
SECP63/08	DCC to provide clarity on the release timeframes and confirmation of the full costs for the modifications targeted for the November 2019 Release.
The Panel discussed the timeframes and costs for modifications targeted for the November 2019 Release under agenda item 16, and provisionally agreed the scope of the November release. Action: CLOSED .	
SECP64/04	SECAS to review the SEC Panel Risk Register to check if the risk of late implementation of SECMP0007 is included.
SECAS reviewed the risk register and confirmed that this aspect was included. The Panel considered the updated Risk Register and Issues Log and confirmed no further mitigations are required. Action: CLOSED .	
SECP64/09	SECAS to undertake a review of the SEC Parties list and request that Suppliers redeclare whether they are a Small or Large Supplier.
SECAS noted that it had emailed all SEC Parties, requesting them to review their SEC Party category. SECAS has amended the SEC Party list to reflect any changes. Action: CLOSED .	

The Panel **NOTED** the updates in the Actions Paper and **AGREED** that the remaining actions should be closed. New action:

SECP65/01: SECAS to issue the minutes from the SoLR workshop held on 13 February 2019 to all SEC Parties.

2. Privacy Controls Framework update

SECAS presented the Panel with an updated version of the Privacy Controls Framework (PCF) v2.3 following discussions that took place at the January 2019 Panel meeting, relating to a Party's route to compliance with SEC Section I (Privacy).

The Panel **APPROVED** the Privacy Controls Framework v2.3.

SECP65/02: SECAS to publish the Privacy Controls Framework v2.3 on the SEC Website.

3. CPA Certificates with 'conditional' end dates (**AMBER**)

The Panel were provided with a confidential update on the developments relating to the conditions that have been attached to two Commercial Product Assurance (CPA) Certificates by the National Cyber Security Centre (NCSC). The discussion was classified as **AMBER** and therefore recorded in the Confidential Minutes.

The Panel **NOTED** the update.

4. SMETS1 Testing Governance Planning update

SECAS provided the Panel with an update on the governance planning and forthcoming Testing Advisory Group (TAG) activities in advance of SMETS1 Initial Operating Capacity (IOC) Systems Integration Testing (SIT) completion and subsequent SMETS1 Services Release testing activities.

SECAS noted that the plan for IOC SIT completion governance activities had been revised to remove any overlap of IOC SIT completion and IOC User Testing Service (UTS) commencement, with this being reflected in the SoS approved Licence Condition (LC)-13 plan.

SECAS noted that the plan still assumes that IOC SIT testing activities will be completed by 22 February 2019 to enable all internal DCC test assurance governance actions to complete by 1 March. This will then enable the TAG and Panel SIT completion recommendation activities to occur.

The Panel were informed that the TAG had undertaken its initial review of the IOC SIT completion report structure and initial content on 30 January 2019, and that feedback provided is being actioned by the DCC with revised versions shared in between TAG meetings. It was noted that, following an additional TAG meeting, scheduled for 6 March, a TAG IOC SIT completion recommendation will be provided at the 15 March Panel meeting.

A Panel Member queried the timescales around completing SIT in light of testing issues that had been encountered with certain Device Model Combinations (DMCs) being used in IOC SIT; SECAS sought to clarify that there were ongoing discussions around the number of DMCs that will be used to

complete SIT, as it may be the case that the DCC completes on two, rather than four, DMCs. The Panel noted that this was still being discussed by the TAG, and any concerns arising from it will be captured with the TAG IOC SIT Completion recommendation paper brought to the next Panel meeting.

It was noted that David Barber would be leaving the SECAS team in March 2019; the Panel expressed their gratitude for the effort and support that David has given the Panel over the past five years.

The Panel **NOTED** the presentation.

5. Draft Budget 2019-22 Consultation Responses

SECAS presented the Panel with the responses received from the Draft Budget 2019-2022 consultation that closed on 31 January 2019, and some suggested Panel responses to the comments made

A Panel Member acknowledged Centrica's response to the consultation, which had recognised the positive efforts made by the Panel in setting the budget.

SECAS presented the Panel with the following proposed amendments to the budget following the consultation:

- Removal of printing costs;
- CPI reduction;
- RPI reduction;
- Removal of Strategic Plan budget;
- Reduction for Independent Expert Crypto Analysis; and
- Contingency budget reduction.

It was noted that the proposed amendments consequently reduced the proposed budget by £147,893.

The Panel:

- **AGREED** a response to each point raised by respondents;
- **AGREED** the proposed amendments to the Draft Budget; and
- **NOTED** the Draft Budget will be published to become the Approved Budget following the Panel meeting.

SECP65/03: SECAS to publish the Draft Budget as the Approved Budget to take effect on 1 April 2019.

6. SEC Panel Risk and Issue Register Update

SECAS provided the Panel with an update on the SEC Panel Risk Register and Issues Log, which included amendments to three existing risks and one existing issue.

The Panel Chair noted that, in light of the DCC's proposal to raise a modification to amend the existing rules under SEC Section H8.3 in relation to Planned Maintenance, Issue 3¹ no longer constitutes an issue, and suggested transferring it from an issue on the issues log to a risk on the risk register.

The Panel:

- **AGREED** the proposed amendments to SEC Panel Risks 4, 13, 16; and
- **AGREED** the proposed amendments to the SEC Panel Issue 1.

SECP65/04: SECAS to transfer Issue 3 from the issues log to the risk register.

7. Risk and impact-based approach to Planned Maintenance (**AMBER**)

The DCC informed the Panel that it has been reviewing Maintenance Schedule requirements in the SEC and presented the Panel with a proposal to amend its approach to enduring planned maintenance. The DCC noted that the plan had been presented to the Operations Group (OPSG), who were supportive of the proposal. The discussion was classified as **AMBER** and therefore recorded in the confidential minutes.

The Panel **AGREED** that, subject to the fulfilment of the above requests, the DCC may initiate a trial of the proposal from 1 April 2019.

SECP65/05: DCC to provide an updated Forward Schedule of Change to the Operations Group, and to clarify the terms 'functional' and 'non-functional' in terms of customer impact, with regards to its planned maintenance schedule.

¹ Issue 3: The number and length of full maintenance outages is not commensurate with the availability of a live service as outlined within the SEC.

8. Current Events of Default update and discussion (**RED**)

The Panel were provided with a confidential update on four existing Events of Default, and one new Event of Default, and considered recommendations from SECAS regarding the monitoring and remediation of each defaulting SEC Party. The discussion was classified as **RED** and therefore recorded in the Confidential Minutes.

The Panel **AGREED** the recommendations for each Event of Default.

9. Event of Default – Solution Options (**GREEN**)

Following recent Events of Default involving Suppliers with SMETS2 installations operated using DCC services, the Panel considered two options for resolving Supplier of Last Resort (SoLR) events where the SoLR Supplier wishes to maintain the systems of the Defaulting Supplier:

1. Supplier generates new identifier(s), new SMKI Organisation Certificates, updates Credentials on all Devices & operates existing systems under a new identifier. Administrative processes may be required to resolve SMKI RA issues and to expel the Defaulting Party; or
2. Supplier maintains existing set-up and Credentials and continues to operate existing systems as they are. Administrative processes may be required to resolve SMKI RA issues and create a 'logical' mapping between the Licensee and the SEC Party.

SECAS informed the Panel that both options had been socialised with several stakeholders, including the Data Service Provider (DSP), the SECAS legal team, Suppliers and Ofgem.

SECAS noted the concerns that had been raised, including that a key point to consider was that a new set of security credentials would need to be created, to replace the credentials on all the Devices., and also that delays, errors or uncertainty for pre-payment customers may exacerbate problems.

A Member queried whether the SSC, SMKI PMA and the TABASC had been consulted, and the Panel requested that SECAS seek further input on whether either option would present any material change to User systems.

The Panel discussed a specific SoLR event that involved Spark Energy Supply Ltd (who ceased trading in November 2018) and Ovo Energy (the appointed SoLR); a Member queried whether the Spark Energy SEC Party will now fall under the Ovo Energy Voting Group. SECAS confirmed that ID Allocation would show that Spark Energy is now mapped to Ovo Energy. SECAS will confirm with SECCo's lawyers the process and status regarding expulsion of a Party whilst retaining the SEC

Party identifiers. Following this, SECAS will share a version of the ID Allocations spreadsheet with the Panel.

The Panel discussed trade sales and a scenario where a Large Supplier ceases to trade; there would be too many customers for one single Large Supplier to take on, and the customers would need to be split between two Large Suppliers. However SECAS noted that it is not currently possible to map one existing company to two separate companies, therefore if a sufficiently Large Supplier ceased trading alternative arrangements would need to be put in place.

The Panel also discussed the implications for pre-payment customers, and SECAS noted that more work would be required to reduce the period between 1) a Supplier failing and a SoLR Supplier being appointed, and 2) a SoLR being appointed and then being able to operate (e.g. sending SR6.24 for all Devices).

Subject to further legal clarifications, the Panel considered SECAS' recommendation that Option 2 should be the preferred solution; the Panel noted that while Option 2 may be a simpler option with potentially less risk, it is ultimately up to the SoLR to decide.

The Panel:

- **AGREED** that either solution may be utilised to resolve SoLR events where the SoLR Supplier wishes to maintain the systems of the Defaulting Supplier; and
- **AGREED** that SECAS should investigate the related points raised.

SECP65/06: SECAS to confirm with the lawyers the process and status regarding expulsion of a Party whilst retaining the SEC Party identifiers. Following this, SECAS to share a version of the ID Allocations spreadsheet with the Panel.

SECP65/07: SECAS to seek further input on whether either option (in a SoLR event where the SoLR Supplier wishes to maintain the systems of the Defaulting Supplier) would present any material change to User systems. SECAS to consult with SSC, SMKI PMA and TABASC.

10. Interested Parties Distribution List

SECAS presented the Panel with a proposal to create and utilise an Interested Party distribution list to enable companies, organisations and individuals who are not obliged to be a SEC Party, to receive public SEC related information and keep up to date with SEC developments.

The Panel **AGREED** that the SEC Newsletter could be circulated to Interested Parties who are not a SEC Party.

SECP65/08: SECAS to include Interested Parties on the distribution list for the SEC Newsletter.

11. Change Status Report – February 2019

The Panel were provided with an update on the status and progress of Modification Proposals.

The Panel were also provided with an update from the DCC on the current progression of SEC Modification Proposals as they undergo Preliminary Assessments and Impact Assessments.

The Panel **NOTED** the update.

12. Update on SECMP0007 'Firmware updates to IHDs and PPMIDs'

Following queries raised by the Panel at the January 2019 meeting, SECAS provided an update on [SECMP0007 'Firmware updates to IHDs and PPMIDs'](#) and outlined the next steps for this modification.

SECAS noted that a Working Group meeting had been scheduled for 25 February 2019, where the requirements for the Preliminary Assessment would be clarified, including the process to be followed in a dual-Supplier scenario. However, it was highlighted that the DCC was reviewing its Preliminary Assessment response for this modification in light of the time that has passed since the original assessment, and that an updated response will be provided by 8 March 2019, meaning this would not be discussed by the Working Group until later in March. The Panel were supportive of this reassessment being done. SECAS noted that it will not be possible to include this modification in the November 2019 SEC Release.

There was discussion around when the modification could be delivered; it was noted that the updated Preliminary Assessment would provide further clarity, however DCC believed that it would not be possible to deliver this modification, due to complexity and design build, until at least Q3 2020. A Panel Member challenged this timescale, believing that the relevant functionality should already exist in the systems for providing over-the-air updates, and therefore it should not be too onerous to reuse these for these additional devices. The DCC agreed to arrange a meeting between the Panel Member and a systems architect to discuss the complexity.

The Panel considered that if every Service Request change is going to cost millions of pounds to implement, then the solution for change is not fit for purpose and needs to be re-evaluated, in order to deliver changes in a timely and cost-effective way.

SECAS noted that it would provide further information on the position of SECMP0007, in addition to [SECMP0010](#)² and [SECMP0013](#)³, which are also being reviewed by the DCC, at the March Panel meeting.

² SECMP0010 'Introduction of triage arrangements for Communication Hubs'

³ SECMP0013 'Smart meter device diagnostics and triage'

The Panel **NOTED** the update.

SECP65/09: SECAS to provide an update on the positions of SECMP0007, SECMP0010, and SECMP0013 at the March Panel meeting.

13. SECMP0025 'Electricity Network Party Access to Load Switching Information' Modification Report

SECAS presented the Panel with the Modification Report for [SECMP0025 'Electricity Network Party Access to Load Switching Information'](#). It was noted that the report had been issued for Panel decision ex-committee on 30 January 2019, however a Panel Member had requested further discussion at the February Panel meeting.

One Panel Member noted that the modification was proposed to be implemented during the rollout of changes for the SMETS1 Enrolment and Adoption programme, and queried if full regression testing would be carried out. The DCC confirmed that full regression testing would be taking place.

Another Member queried why this modification needed to be included in the November 2019 SEC Release, noting that the release would sit right in between the current dates for the Middle Operating Capability (MOC) and Full Operating Capability (FOC) releases. The Member noted concern that this modification may not provide any benefit to Network Parties at this time and wondered if this modification would be better delayed or rolled up in SECMP0046, under which the provision of this data would be necessary as part of a bigger solution. Implementing this change now may create work and risk for Users, around a time when there are other DCC developments occurring. The Panel noted that the driver for implementing this change in the November 2019 Release was the marginal costs of implementing this change in this release.

The Panel discussed the type of data that would be accessible, and how that links to privacy. A Member queried what data was being sent over the affected Service Requests, and whether data privacy and GDPR implications had been assessed around this, querying who owns this data. SECAS agreed to provide answers to these queries ahead of the Change Board vote. Noting this, the Panel agreed to progress the modification to Modification Report Consultation and Change Board vote.

The Panel:

- **AGREED** that SECMP0025 should be progressed to the Report Phase;
- **AGREED** the duration of the Modification Report Consultation to be five Working Days;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and

- **AGREED** that SECMP0025 should be progressed as an Authority Determined Modification.

SECP65/10: In regard to SECMP0025, SECAS to provide answers to Panel Member queries relating to data ownership.

14. New Modification Proposal SECMP0069 ‘EU Exit Changes’

SECAS presented the Panel with a new Modification Proposal for [SECMP0069 ‘EU Exit Changes’](#).

The Panel:

- **AGREED** that SECMP0069 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that SECMP0069 should be progressed as a Self-Governance Modification.

15. New Modification Proposal SECMP0070 ‘Permission to give Alt HAN Forum vires for enduring management and maintenance of the EPL’

SECAS presented the Panel with a new Modification Proposal for [SECMP0070 ‘Permission to give Alt HAN Forum vires for enduring management and maintenance of the Exempt Premises List \(EPL\)’](#).

The Panel:

- **AGREED** that SECMP0070 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach; and
- **AGREED** that SECMP0070 should be progressed as a Self-Governance Modification.

16. November 2019 SEC Release

The Panel were provided an update on the current status of the November 2019 SEC Release, and considered the Release Implementation Document (RID). The Panel were also provided an update on the June 2020 SEC Release.

A Member noted that some changes in the November release may have significant implications for some Users, but not for others. It was noted that SEC Releases fall under the Panel's jurisdiction, and it is therefore the Panel's decision whether or not to proceed with a release and what is included in it. The Panel reiterated the concerns raised under the SECMP0025 Modification Report, noting that implementing a November 2019 Release in between MOC and FOC may place too much impact on Parties, and queried the benefits of the modifications proposed for inclusion in November 2019. Members noted there would be cost-savings associated with implementing modifications in November 2019, and that this presents an opportunity to implement approved modifications. However, Members were not clear whether Parties would want this release at this time, or what the benefits of implementing these changes at this time would be compared to implementing them in a later release.

The Panel requested SECAS to consult with Users on the scope and the timing of this release and on whether the impacts of the release would be manageable if implemented at this time. The Panel determined to provisionally agree the scope of the release now, and to revisit this in March 2019 in light of any responses received from Parties. The DCC noted that the scope for the November 2019 Release will need to be confirmed by the end of March, in order for it to proceed.

The Panel:

- **PROVISIONALLY AGREED** the modifications that impact the DCC Systems to be included in the scope of the November 2019 SEC Release;
- **BASELINED** the November 2019 SEC Release Implementation Document for these modifications;
- **NOTED** the November 2019 SEC Release Implementation Document will be returned in May 2019 to be re-baselined to include any modifications that do not impact the DCC System; and
- **NOTED** the update on the June 2020 SEC Release.

SECP65/11: SECAS to issue a request for information to Parties on the scope and timing of the November 2019 SEC Release and whether the impacts of this release would be manageable if implemented in November 2019. Any responses received to this will be presented at the March 2019 meeting.

17. Change Process Improvements update

SECAS provided the Panel with an update on the work being undertaken to improve the SEC Modifications Process, including an overview of the function of the Change Sub-Committee (CSC), and how the Development Stage will work.

The Panel **NOTED** the update.

18. BEIS Update

BEIS provided the Panel with an update on recent publications, forthcoming consultations and key milestones.

A Panel Member queried whether the consultation on the preferred ECoS solution would be include SoLR; BEIS noted it would and agreed that discussions with SECAS would be required.

A Panel Member queried the 2020 Supplier mandate around SMETS meter installs and questioned what would happen if Suppliers did not meet their licence obligations. SECAS were requested to investigate whether the SEC sets out an obligation on Suppliers to meet the 2020 end date.

[post-meeting note: SECAS can confirm that this is a licence provision that is under Ofgem's jurisdiction.]

The Panel **NOTED** the update.

19. DCC Update

The DCC presented the Panel with an update on the activities undertaken since the last Panel meeting.

There was discussion around the DCC's production status and the SMETS1 LC13 plan, which was classified as **RED** and therefore recorded in the confidential minutes.

The Panel **NOTED** the update.

20. SEC Panel Sub-Committee Report

SECAS provided the Panel with an update on recent activities from all the SEC Panel Sub-Committees.

The Panel **NOTED** the update.

21. DCC Reporting

The Panel were provided with the Certificate Signing Requests (CSR) Forecast Variance Report, the Service Request (SR) Variance Report and the Post Commissioning Information Report from the DCC as required by the SEC.

The Panel considered a request to delegate the CSR and SR to the OPSG; it was noted that the OPSG and the DCC are of the view that these reports need to be formally reviewed and managed, as

obligations for SEC Parties (H3.24) that underpin these reports are not being fulfilled. The Panel agreed to refer the reports to the OPSG to review and action as necessary.

The Panel also reviewed its current “blanket redaction” on these reports which was due to expire in February 2019 and agreed to lift the redaction blanket and allow the OPSG to begin publishing the reports on the SEC Website from 1 June 2019, should the OPSG choose to do so. It was noted that this will allow Parties 3 months’ notice to begin submitting their forecasts to the DCC.

The Panel:

- **AGREED** to remove the ‘blanket redaction’ from 1 June 2019;
- **APPROVED** delegating the SR and CSR reports to the Operations Group (OPSG);
- **ENDORSED** the request from the DCC that Parties that have an obligation to submit a Service Request forecast do so; and
- **NOTED** the observations from the OPSG in relation to the DCC reports delegated to them.

SECP65/12: SECAS to update the Delegations Register to reflect the delegation of the CSR and SR to the OPSG.

SECP65/13: OPSG to notify Parties that they must provide forecasting reports to the DCC as per SEC Section H3.24.

22. Operations Report – January 2019

The Panel were presented with the Operations Report for January 2019. The report provided an outline of the activities undertaken by the SECAS team in support of the SEC.

The Panel noted that the following organisations would be admitted as Parties to the SEC following countersignature of their Accession Agreements by the SECCo Board:

- Zythos Energy Limited (Small Supplier);
- Perle Energy Limited (Small Supplier);
- Simcoe Energy Limited (Small Supplier);
- Tilicum Energy Limited (Small Supplier);
- Willamette Energy Limited (Small Supplier);
- Euston Energy Limited trading as Northumbria Energy (Small Supplier);
- Northern Powergrid Metering Limited (Other SEC Party);
- Electric Avenue Energy Ltd (Other SEC Party);
- Elster Metering Limited (Other SEC Party); and

- SGN Smart Limited (Other SEC Party).

The Panel **NOTED** the report.

23. Smarter Markets Project Update

The Panel were provided with an update on the activities currently being undertaken to support the project.

The Panel **NOTED** the update.

24. Transitional Governance Update

SECAS presented the Panel with an update from the transitional governance entities and other smart metering related meetings and workshops attended by SECAS in the last month.

The Panel **NOTED** the contents of the paper.

25. Any Other Business

The Panel were informed that the Code Administration Code of Practice (CACoP) was seeking feedback; SECAS noted it would be sending questions regarding the CACoP to Panel Members via email following the meeting, with answers required by 28 February 2019.

A Member requested SECAS to provide an update at the March Panel meeting, on the outcome of a request at the September 2018 Panel meeting. The request relates to the DCC's request to appeal the Panel's determination of Incentive Scheme Milestone 1B, where a Panel Member requested a workshop to discuss the DCC's lessons learned.

There was no further business and the Chair closed the meeting.

SECP65/14: DCC to present lessons learned document, with regards to the appeal of the Incentive Scheme Milestone 1B, at the March 2019 Panel meeting.