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Action:	**For Decision**

Sharing Information on Issues and Defects

1. Purpose

This paper seeks the SEC Panel's view on the sharing of information amongst SEC Parties relating to issues and defects, suspected or confirmed, related to Devices and device combinations (including Comms Hubs). The CSPN Common Issues Working Group asked that this matter be raised at the Panel.

The purpose of such sharing would be to facilitate cooperation on solving issues and to mitigate operational risks affecting DCC services and SEC Parties, and to ensure that relevant information is available to all SEC Parties.

The paper notes that if incorrect information is communicated, there could be reputational and commercial consequences; on the other hand, lack of access to relevant information may also have commercial and operational consequences for SEC Parties.

Note that this paper does not seek to address the broader question of the consideration of the compliance or non-compliance of Devices with SMETS requirements. This should be part of a more general consideration of performance assurance.

A number of possible options are identified ranging from "no change" to active provision of information about specific issues.

The Panel is asked to indicate its preferred strategy.

2. The Problem

2.1 Summary

It has been suggested that the sharing of information regarding possible issues related to Devices and DMCs would assist in facilitating issue resolution and would enable all SEC Parties to understand the impacts on DCC services.

The SEC does not make explicit provision for the sharing of information amongst SEC Parties regarding suspected or confirmed defects in Devices and the impact on DCC services.

DCC believe that they cannot facilitate such sharing, since they need to keep confidential the information they hold about a particular installation, only discussing it with the Supplier responsible. Hence, a possible issue or defect known to one SEC Party cannot as a matter of course be explicitly

communicated to other SEC Parties. It is understood that DCC would need to reconcile any involvement in such sharing with its obligations under its licence and the SEC.

More broadly, individual SEC Parties may make commercial and operational decisions without access to information which, it might be said, has been assembled under the auspices of the SEC.

Consequently, what would be beneficial cooperation aimed at improving the effectiveness of the smart metering arrangements is, to an extent, constrained. At present, consideration of such issues may be taken forward by a series of bilateral discussions. This might include discussions between DCC and Device manufacturers: DCC has no formal contractual relationship with Device manufacturers (other than Comms Hub providers).

On the other hand, a significant aspect of this problem is the potential for reputational damage if incorrect information were to be shared. In such circumstances, it is possible that a Device manufacturer might seek redress for any adverse impacts.

2.2 A Brief Illustration: Alerts

This constraint on information sharing has been known for some time, but its consequences have recently become especially apparent in the work of the CSP N Common Issues Forum. Amongst other matters, this Group is dealing with the impact of Superfluous Alerts in the CSP N Region. This Group asked that the issue of information sharing be raised with SEC Panel.

A variety of types of Superfluous Alerts are causing large traffic flows on the DCC infrastructure, to the extent that, in some cases, DCC Service Providers assert that their ability to support normal services is being impaired; further to this, DCC has felt obliged to authorise investment in infrastructure capacity to ensure that the network can support the traffic being experienced.

These Superfluous Alerts appear to be correlated with a variety of Devices and DMCs (including Comms Hubs). The situation is in many cases complex: the questionable behaviour may arise consistently or intermittently, and for only a subset of suspected devices in certain circumstances; in some cases, root causes have been identified, in others a root cause is suspected but not confirmed; in yet others, no root cause is known.

Moreover, in a number of cases, a statement of root cause and remediation has been made, but has subsequently proven to be incomplete, and possibly inaccurate, and has been subject to challenge.

Nonetheless, in numerous cases, the observation of Superfluous Alerts related to various configurations is clear, even if the root cause cannot be definitively identified.

3. Candidate Strategies

The purpose of the following options is to provide a basis for discussion by the SEC Panel. Variations of these strategies could be envisaged. Were either Options 3 or 4 selected, it would need to be developed in detail before implementation.

3.1 Option 1 - Continue As Is

This would mean that the sharing of information on issues, suspected defects, and defects, would continue as present. In essence, it would continue to centre on bilaterals between directly involved parties.

Advantages

Questions over certainty, consequential unjustified reputational damage, and possible liabilities are minimised.

Disadvantages

(a) This approach does not actively facilitate and encourage a cooperative approach across SEC Parties to solving what might be urgent problems.

(b) SEC Parties, unless directly involved, do not currently have access to information on the issues that are arising. These Parties may make commercial and operational decisions in ignorance of such information.

3.2 Option 2 - Panel Request to DCC to Facilitate Information Sharing amongst Parties

This would mean the Panel formally asking DCC to support sharing of relevant information amongst SEC Parties.

The belief is that DCC would not feel able to satisfy this request without some form of formal legal support (for example, a SEC Modification, and possibly confirmation of any licence implications). However, making such a request would prompt a clear definition of DCC's position, and the rationale for it. This could be a useful precursor to Option 3 or Option 4 below.

3.3 Option 3 - Separate Communications to Manufacturers and SEC Parties

In this approach the Panel would

(a) Write to all SEC Parties reminding them that they are responsible for ascertaining and confirming the suitability of Devices that they procure and install, and that they should therefore enquire of their Device suppliers as to whether there are any known or suspected issues relating to use with DCC services

(b) When a defined threshold of certainty and impact regarding a particular issue has been reached;

(i) Write to the manufacturers of the devices involved, informing them of the apparent issue and the circumstances in which it occurred and asking them to cooperate in its resolution, and to inform SEC Parties with whom they have a relationship. This communication would be made without any assertion of responsibility of non-compliance.

(ii) (for consideration) Inform SEC Parties that a possible issue had been identified, identify the devices involved (without any comment on responsibility or non-compliance), and invite them to cooperate in its resolution.

(iii) Ask DCC to coordinate investigation and resolution of the issue.

Implementation of this option may require strengthening of SEC provisions.

Advantages

This option ensures that manufacturers are clear that there is an issue under investigation, and in effect asks them to inform SEC Parties as customers or potential customers.

The communication from the Panel to SEC Parties (item (b) (ii) above) would close the loop with SEC Parties.

Disadvantages

There would be no obligation on manufacturers to inform their customers (SEC Parties) if they did not accept the statement of the issue.

The communication of the possible issue to SEC Parties opens the question of reputational and commercial damage and liability.

3.4 Option 4 - Central Register of Known Issues

This in essence is a development of Option 3. The Panel would authorise the development and maintenance of a central register of suspected issues and the Devices involved. Any SEC Party would be able to access this information. Only issues for which a defined threshold of certainty had been achieved, and with a defined level of impact on the provision of DCC services to SEC Parties, would be included. Manufacturers would be informed of the intention to add an issue involving their Device to the register and would be invited to cooperate in its resolution.

As a first step, it might be valuable to consider establishing a central tracker for the Superfluous Alerts topic. This would explicitly identify the DMCs (including Comms hubs) correlated with Superfluous Alerts in each region. This has been proposed by at least one stakeholder.

Advantages

This option would clearly make relevant information on issues available to all SEC Parties and could facilitate cooperation on issue resolution.

Disadvantages

As with Option 3, the provision of specific information opens the question of reputational and commercial damage and liability.

4. Recommendations

The Panel is requested to:

- **CONSIDER** the contents of the paper;
- **INDICATE** which of the identified Strategy Options it would like to adopt; and
- **INSTRUCT** SECAS to develop its preferred Strategy Option.

Dave Warner

Chair of SEC Operations Group

6 March 2020