

Peter Davies, Panel Chair
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Duncan Stone
Smart Metering Implementation Programme,
Department for Business, Energy & Industrial Strategy,
1 Victoria Street,
London, SW1H 0ET

21 April 2020

Dear Duncan,

Live Services Criteria for the Active and Dormant IOC Aclara entries onto the Eligible Products Combination List (EPCL) for SMETS1

The Panel considered, on 17 April 2020, the evidence submitted by the DCC regarding the readiness to migrate and operate active and dormant Initial Operating Capability (IOC) Aclara Device Model Combinations (DMCs).

IOC Aclara DMCs were originally planned to be added to the EPCL during July 2019. However, due to an issue that impacted the security of Devices, the decision was taken not to add these DMCs to the EPCL at that time. IOC Aclara Devices have subsequently had their firmware remediated to rectify the security defect.

The DCC is not currently requesting approval of its readiness to migrate mixed IOC Aclara DMCs due to an outstanding defect which was carried over from earlier IOC testing. The impact of this defect is that it is not possible to identify the energy supplier responsible for dormant Devices within a mixed installation. Mixed installations will be unable to progress until this defect is fixed, which is expected to be implemented on 6 May 2020.

The Operations Group (OPSG), Testing Advisory Group (TAG) and Security Sub-Committee (SSC) all considered and commented on an outstanding Severity 3 Testing Issue (110031) that relates to the rotation of a Device's Management Key, which is required within seven days of a Device being Migrated. This Testing Issue results in the first attempt at key rotation failing to provide confirmation of successful key rotation for all Aclara Devices, although in every case the key was rotated. When a second key rotation command is issued at least five minutes after the first attempt, a successful response is received.

DCC has identified a fix which will automate multiple key rotation commands which is due to be implemented as part of the April Planned Maintenance release. This fix will change the code base, resulting in a requirement to carry out further regression testing using DCC's standard regression test pack once the fix has been implemented. Because of this need to carry out further regression testing, the Panel recommends that IOC Aclara DMCs should only be added to the EPCL once BEIS has received satisfactory assurance from the DCC that further regression testing has been successfully completed. The Panel regards this condition as a prerequisite to go-live and the Panel's go-live recommendation is conditional upon satisfactory assurance being presented to BEIS prior to go-live.

The Panel determined that the evidence provided by the DCC satisfactorily demonstrated that the agreed testing had completed successfully, and that the DCC is operationally ready to start the migration of active and dormant IOC Aclara DMCs once the condition outlined above has been met.

This letter serves as our report to the Secretary of State regarding the DCC's readiness to provide the relevant Services. Further details of the Panel's considerations are provided in Annex 1 to this letter.

The Panel would note that particular care must be taken with the migration of active metering systems. These are live consumers who may be impacted by any failure of the process; this could have the potential for a profound impact on consumers' perception of the smart metering programme.

Having considered the Live Services Criteria and supporting evidence from the DCC, and views from the TAG, OPSG and SSC:

- I. the Panel agrees with the Sub-Committees' recommendation to accept the DCC's statement of readiness.
- II. the Panel agrees that active and dormant IOC Aclara DMCs may be added to the EPCL for SMETS1, subject to the condition set out in relation to LSCs 4 and 5 in Annex 1 to this letter.

If you would like to discuss the above in further detail, please do not hesitate to contact myself or SECAS via 020 7090 7755 or SECAS@gemserv.com.

Yours sincerely,



Peter Davies

SEC Panel Chair

CC: Panel Members
SEC Parties
DCC
Authority

Annex 1 – Overview of the Panel’s considerations

Views Relating to the Entry and Exit Criteria of the Testing Phases

The TAG has reviewed each of the DCC's completion reports in relation to the relevant testing phases for SMETS1 Services and has confirmed that the entry and exit criteria have been met in relation to active and dormant IOC Aclara installations.

Views Relating to the Live Services Criteria

The TAG, OPSG and SSC reviewed the Live Services Criteria submission and assessed the criteria relevant to each of the groups and accepted the DCC statement of readiness, with the following noted against Live Services Criteria 4,5, 9 and 10:

LSC 4 - Regression Testing has completed successfully for SMETS1 and SMETS2 Live Systems:

During migration testing a Testing Issue was identified (110031) and initially assigned a Severity 2 rating, which was downgraded to Severity 3 following analysis of the root cause and impact, which the TAG agreed. A fix is expected to be implemented as part of the May Maintenance release. This fix will change the code base, resulting in a requirement to carry out further regression testing using DCC's standard regression test pack once the fix has been implemented.

Because of the need to carry out further regression testing, the Panel recommends that IOC Aclara Devices should only be added to the EPCL once BEIS has received satisfactory assurance from the DCC that further regression testing has been successfully completed.

LSC 5 - Testing of SMETS1 Services for the relevant DMCs has completed successfully: The TAG agreed that the testing set out in the IOC Aclara Depth and Breadth of testing document had completed within agreed tolerances, although one of the outstanding Testing Issues relating to Migration Testing (110031) introduces a need to carry out further regression testing.

As set out in response to LSC 4, the Panel recommends that IOC Aclara Devices should only be added to the EPCL once BEIS has received satisfactory assurance from the DCC that further regression testing has been successfully completed.

LSC 9 - Assurance of required Business Continuity/Disaster Recovery: The OPSG acknowledged the postponement of Disaster Recovery testing and the difficulty in re-planning under the current COVID-19 restrictions. The OPSG requested further information on implications of the postponement and for revised plans when they become available, but no deadline for completing this was set.

The OPSG accepts the statement of readiness provided by the DCC but assessed this LSC as Amber.

LSC 10 - Completion of relevant security testing and approval of security architecture:

Sub-criterion 4 - Security testing assurance: DCC and the SSC are aware there is an existing residual risk due to a lack of security assurance on Home Area Network (HAN) attached Devices. To mitigate this risk, the DCC has agreed a strategy with the SSC to procure a third-party to undertake limited scope negative functional security assurance for HAN devices. This will be outlined in planned



changes to Transition Migration Approach Document (TMAD) for future operating capabilities and DMC's.

Except for the HAN related risks, any residual gaps continue to be considered Low due to other extant, tested controls.