

# Energy UK response to Consultation on the proposed changes to SEC Subsidiary Documents that define DCC's service for SMETS1 devices.

14 December 2017

## About Energy UK

Energy UK is the trade association for the GB energy industry with a membership of over 90 suppliers, generators, and stakeholders with a business interest in the production and supply of electricity and gas for domestic and business consumers. Our membership encompasses the truly diverse nature of the UK's energy industry – from established FTSE 100 companies right through to new, growing suppliers and generators, which now make up over half of our membership.

Our members turn renewable energy sources as well as nuclear, gas and coal into electricity for over 26 million homes and every business in Britain. Over 619,000 people in every corner of the country rely on the sector for their jobs with many of our members providing lifelong employment as well as quality apprenticeships and training for those starting their careers. The energy industry adds £83bn to the British economy, equivalent to 5% of GDP, and pays over £6bn in tax annually to HMT.

## Executive Summary

Energy UK is supportive of the Department for Business, Energy and Industrial Strategy (BEIS) and Data Communications Company (DCC) approach to Enrolment and Adoption of installed SMETS1 metering systems. This first Tranche of Smart Energy Code Subsidiary Documents (SSDs) contains much of the information required to enable DCC users to design and develop systems required to interface with DCC and operate a SMETS1 service, but not everything.

Energy UK is wary that a number of other key documents such as the Transition and Migration Approach Document (TMAD) or Technical Security Architecture remain under review or are not due for publication until next year. These could have significant impacts on the Tranche 1 Documents we are being asked to baseline. We suggest DCC and BEIS need to consider the impacts of documents such as TMAD on the already published Tranche 1 SSDs, and whether further industry review of these SSDs is required in due course.

UTRN generation and the general provision of prepayment services are a further source of concern. Though Energy UK understands the rationale for SMETS1 service providers generating UTRNs we consider the provision of UTRNs back to Suppliers via an Alert to be sub optimal and potentially consumer impacting in response times. Energy UK has also previously stated in DCC workshops that high availability and reliability of the UTRN service is a critical requirement if the power to manage, service and provide UTRNs must be moved out of Supplier control. The ability to deploy firmware to IHDs and in particular IHDs that have Prepayment Interface capability to maintain their accuracy and capability is another outstanding issue that we are eager to see resolved.

Concerns remain for Energy UK that clarity on which processes will involve DCC orchestration and how this will impact retries and Target Response Times (TRTs) continues to be unclear. A number of issues remain on the operation of prepayment services, too, including the return of UTRNs via an Alert and correct configuration of SMETS1 devices in prepayment mode such as supported non-disconnect calendar periods.

Energy UK notes that many - if not all - SMETS1 meters in the market have never been operated with all SMETS1 services functional or have had full operational testing of these services. Energy UK recommends that BEIS and DCC consider what impacts testing may have when the reality of operation meets theory and develops a clear process for review of issues and resolution either by introducing changes to the baselined documents or deploying firmware without the need for lengthy

SEC modifications. We would suggest consideration needs to be given as to where such an issues management process sits (e.g. BEIS / Transition Governance or SEC Panel).

Whilst this response provides our members' consolidated view, it is important to note Energy UK expected DCC to publish its consultation earlier than it did so that industry has an appropriate amount of time to properly consider the extensive material in the SSDs. The relatively short timescales for responses (compared with a standard response period of 6-8 weeks) is likely to result in some areas potentially being missed in industry's reviews – we suggest DCC captures this as a risk.

### **Question 1 Do we have any comments on the proposed changes to the SRPD?**

In Section 2 of the document it may be necessary to consider what - if any - protections need to be prescribed for the Export Supplier or Supplier of the GSME where the ESME Supplier intends to deploy new CHUB Firmware.

In Section 6.5 of the document, Energy UK is interested to know if DCC has considered if there is any scenario where SMETS1 Future Dated Service Requests being managed by the Data Service Provider may contain data falling into the remit of General Data Protection Regulation (GDPR). Where such scenarios do exist, sufficient controls and protections will be required to protect them as the Data Operator and Suppliers as the Data Controllers.

Energy UK considers that amendments to Anomaly detection and Countersigned Service Request Processing are sensible and necessary for the operation of SMETS1 Smart Metering Systems.

Energy UK notes a quarantine area is not proposed for anomaly breached SMETS1 Service Requests. However, there are 3 new alerts in DCC Release 2 (N46, N47 and N48) which provide a breach advisory mechanism that DCC Users can take advantage of automatically i.e. block outbound messages, raise incident etc. The new alerts seem to be dependent on quarantine, and Energy UK considers it would be sensible to ensure that the alerts are supported for both SMETS1 and SMETS2+.

### **Question 2 Do you have any comments on the proposed changes to DUIS?**

In Clause 1.4 the document still refers to Target Response Times not applying to SMETS1 devices and following provisions will apply 'TBC'. This is a clear example of an unsatisfactory gap that directly impacts suppliers' ability to produce complete designs for operating SMETS1 devices. Energy UK urges DCC to clarify what Target Response Times can be expected with expedience.

Energy UK notes that in Section 1.4.6 the described variances in Validation conditions for SMETS1 devices reinforces the need for DCC Users to have clear identification of the SMETS version of DCC devices in their systems to ensure timely and efficient processing of service requests. This is an example of where additional systems and adaptor changes will be required with associated costs to enable the operation of SMETS1 meters post enrolment. These costs cannot be avoided and are not unexpected but should be taken into account in the overall cost of Enrolment and Adoption of SMETS1.

Energy UK notes that DCC has described in DUIS Clauses 1.4.7.14 & 15 that a new DCC Alert N57 will advise the GSME supplier of the ESME Suppliers intent to deploy new Firmware. There is a 5 day window for delivery of new firmware described in the DCC User Interfaces Schedule of Appendix E of the SEC. However the 5 Days window is a maximum time for deployment and provides no protection to the GSME Supplier, not provides any opportunity to take appropriate action before their asset is potentially stranded. Extra protections for all suppliers with active associations to a SMETS 1 metering system should be considered, as expressed by members in the DCC workshops on Firmware and comments in Question 1 of this response on the SRPD.

Energy UK notes that in Clause 3.6.3 it states that Alert code N56 will be used to transport a SMETS1 UTRN from the S1SP to the Supplier upon request. Energy UK members are concerned about this for several reasons.

1. Energy UK's member feedback is that adapting their systems to utilise Alerts for this critical process will be difficult and expensive. Currently most Alert processing produces reports or workflows for action in other parts of Suppliers businesses. Utilising Alerts as the method of UTRN delivery will require much more complex governance and transformation. The use of Alerts for UTRN delivery is not welcomed and standard synchronous Critical Service request response would be preferred.
2. Energy UK and our members have been consistently clear that if UTRN generation must deviate from the SMETS2 model of Supplier provision, it is critical that there is a high level of availability and reliability in the UTRN service. DCC's plans to provide this service as part of its core SMETS1 service by locating the function within the S1SPs may increase the risk poor availability or impact the TRT for UTRN provision during peak demand periods. This would be an unacceptable outcome for Suppliers and consumers.
3. Energy UK notes the Provision of UTRNs to Suppliers via an Alert would not be synchronous. This makes the timings of response and expected TRTs for UTRNs unclear and is of concern for system integration design.

**Question 3 Do you have any comments on the proposed changes to MMC?**

Energy UK has no comments on the proposed changes to the MMC.

**Question 4 Do you have any comments on the proposed changes to the IEWP?**

Energy UK notes that on Page 6, Clause 3.4 'Adding SMETS1 to the inventory' it is not clear if this data can be provided in bulk. Our members have assumed that it can be. We also note that more detail is required on the obligation to provide DCC with all data that it 'reasonably requires'. Reasonable is a subjective term and creates a risk of disputes over what is 'reasonable' arising.

**Question 5 Do you have any comments on the proposed changes to OCP?**

Energy UK has no comments on the proposed amendments to the OCP and notes that without access to the SMETS1 Security Risk Assessment it would be impossible to comment on the validity of the proposed changes.

**Question 6 Do you have any comments on the proposed changes to SMKI IDS?**

Energy UK has no comments on the proposed amendments to the SMKI IDS and notes that without access to the SMETS1 Security Risk Assessment it would be impossible to comment on the validity of the proposed changes.

**Question 7 Do you have any comments on the proposed changes to CPL?**

Energy UK has no comments on the proposed changes to the CPL.

**Question 8 Do you have any comments on the proposed changes to S1SR?**

Energy UK has noticed that in Clause 2 in numerous definitions they refer to other clauses. For ease of use we would suggest they are brought together into a table of definitions.

Energy UK has noted that in Table 2 in Clause 8.2 there are several Message codes and Log codes that are annotated as TBC. It is imperative that these are defined at the soonest possible point in order for Suppliers to develop their event handling designs in full.

On page 11 in the event table in Clause 8, event 4.3.9.1 does not trigger an alert to the supplier when there is an "Occurrence that has the potential to put Supply at risk and/or compromise the Integrity of the Device". Surely this should trigger an event or alert to the Supplier?

Energy UK suggests that for Clause 8.5 every effort should be made to prevent the possibility of a Device not having an assigned User Id. This seems to be a matter of data integrity which should be a risk that can be minimised.

Energy UK believes that section 12 point (A) is not an example of a Replay scenario. The way it is described it appears to be a validation error and therefore treated as such.

**Question 9 Do you agree that no changes are required to TADP?**

Energy UK does not consider that enough information is available at this time to provide a definitive yes/no response to this question.

**Question 10 Do you have any other comments on the proposed changes to the SSDs? Are you aware of any other issues, relating to the SSDs that should be addressed and considered?**

Clause 2.10.5 of DUIS raises some questions about the need for Service Request Prioritisation. Energy UK is concerned that when a large number of future dated commands are generated e.g. during a pricing update event, this may have a negative impact on DCC's ability to service requests for UTRNs or other critical commands. Large volumes of Critical Service requests being deployed within a short time frame could overwhelm DCC capacity, deployment of Prioritisation of Critical Service Requests such as UTRNs would ensure that Suppliers and end consumers are not suffering detriment as a result of unusual demand.

Finally, Energy UK would like to take this opportunity to re-iterate our members' concerns over the lack of provision of a robust process over which Suppliers have control to deploy Firmware updates to In-Home Displays and Prepayment Interface Devices. As previously noted in the Energy UK letter of 31 October 2017, our members consider this to be one of the key issues in the overall DCC Design for a SMETS1 service. Energy UK is eager to work with DCC to analyse all available options for provision of this service and resolve Supplier concerns in this area. Energy UK also welcomes DCC commitment to mapping more Non-Mandated Alert Codes from SMETS1 meters to assist Users in understanding which Alerts are key amongst the many SMETS1 variations. We would however like to see this mapping included within one of the SSD's for supplier reference.

I trust that this response is helpful. Should you wish to discuss any aspect of this response with Energy UK, either in isolation, or with our members collectively, please do not hesitate to contact me directly.

Yours faithfully,

Daisy Cross  
Head of Smart Metering – Energy UK