

**DCC User Gateway Services and Service Request Processing:**

**Q6 Do you agree with our proposed text for the SEC, with respect to the DCC User Gateway Services and Service Request Processing?**

*Yes, broadly, subject to comments below and outcomes from the ongoing DCC Design Fora*

We note that the work of the DCC User Gateway Design Forum has not yet concluded and that a number of issues are therefore still being discussed and key SEC subsidiary documents being developed. However, pending the outcome of these discussions and the production of these documents, we would like to take this opportunity to make a number of detailed comments on the proposed Legal Drafting, as follows:

We note that SEC clause H3.4 covers the obligation on all Parties to use the Gateway for intended purposes only and we therefore assume that this also includes the 'CoS Party User'. However, as this is such a critical role in terms of security, we seek clarification on this point. Further, we would like to establish how this separation satisfies SEC clause H1.2, which notes that the DCC cannot be a User. We believe that clarification obtained now will mitigate any potential problems at a later date should there be an unexpected clash of intent regarding these clauses;

**Annex 5 of the SEC2 Consultation (DCC User Gateway Services Schedule)**

We note that a copy of the DCC User Gateway Services Schedule has been included as Schedule 5 within the SEC2 Consultation document itself. We have the following comments to make on this Annex Table 5.1:

**Service Ref 3.5** - Latest DUGC (V3.1) documents this as Reset Privacy Pin not Reset Customer Pin;

**Service Ref 4.15** - Latest DUGC (V3.1) did not have ENO as being able to request this service - what is the rationale for this change to allow them to do this?

**Service Ref 6.2** - Latest DUGC (V3.1) did not have Other Users as being able to request this service - what is the rationale for this change to allow them to do this?

**Service Ref 6.18** - Latest DUGC (V3.1) documents this as 'Reset' not 'Set' - should be aligned for consistency;

**Service Ref 7.11** - Latest DUGC (V3.1) did not have ENO or Other Users as being able to request this service - what is the rationale for this change to allow them to do this?;

**Service Ref 8.1** - Why has EES been dropped as being able to request this service? What if export supplier wishes to install a separate export meter from the one installed by the import supplier - they would need this service to allow them to do this;

**Service Ref 7.11** - Latest DUGC (V3.1) did not have SNA, ENO, GNO or Other Users as being able to request this service - what is the rationale for this change to allow them to do this? and

**Service Ref 8.14** - Latest DUGC (V3.1) has Retrieve Device Security Credentials but this is not in the schedule.

**H1.4** - Further clarification is required regarding the identification number referenced within this Clause. For example, where a company has multiple supply licences can

they propose one unique identifier covering all their multiple supply licences, or must they propose a different unique identifier for each supply licence? Is the unique identifier unique to a gateway or not? Would Prepayment Service Vendors, e.g. Paypoint, require their own unique identifier, when acting on behalf of a Supplier? Would it be more efficient for the DCC to allocate this number to industry parties? Clarification on where these issues are being progressed would also be appreciated. For example, which working group or forum;

**H3.12** – We believe that scenarios may exist in which a User could believe, in good faith, that they are the Eligible User and could therefore send (in good faith) a Service Request. We therefore suggest that Clause H3.12 is amended to read: "A User shall not **knowingly** send a Service Request in respect of a Smart Metering System....";

**H3.14** – In order to assist with readability, we believe that there may be benefit in capturing the level of detail contained within this Clause as a table within the relevant DCC User Gateway Interface Specification (DUGIS) Subsidiary Document and then just capturing the fact that Access Rights are determined in accordance with the relevant Subsidiary Document (DUGIS) within this Clause;

**H3.16** – We require clarification around the purpose of specifying the three services listed here. For example, is it to cover the situation where a supplier nominated agent (SNA) needs to be able to send Device pre-notification details on a supplier's behalf for Requests WAN Matrix and Read Inventory? If so table 5.2 in Annex 5 needs to be updated to support device pre-notifications by SNAs;

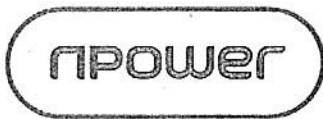
**H3.19 (Sequenced Services)** – We note that discussions regarding this issue have been undertaken at the DCC User Gateway Forum meetings. The DCC has stated that for sequenced commands Users need to send the complete set within 2 minutes of the first message. Clarification is required regarding how this would work if the schedule contains a mix of critical and non-critical commands;

**H3.20 (Target Response Times)** - We note that Target Response Times for individual transactions are detailed within this Clause, and that the DCC are currently considering bulk update scenarios. For clarity, we believe that it would be helpful if the information contained within this clause could be captured within the Services Schedule. For example, via the inclusion of an extra column within the schedule;

**H3.20 (h)** – our current understanding is that the billing data that is sent as a response to "Update Device Configuration (Billing Calendar)", will be sent as an alert. However this is not clear within this legal drafting, we therefore seek clarification on this point;

**H3.23 (Change of Tenancy)** – We do not believe that it is appropriate from a privacy perspective for the outgoing Energy Consumers historic data to be retained for viewing on the Smart Metering System and request that the bracketed text within this clause is removed;

**H4.6** – In addition to being able to send the Pre-Commands to the DCC, Users also need to be able to send these commands to a HHT, and the legal drafting here should be amended to capture this requirement, which is included within the DCC User Gateway Interface scope;



**H4.8 (Obligations of the User: Communications Received in Error)** – This Clause states that where a User receives a communication in error via the DCC User Gateway that the User must notify the DCC. No action that must be taken by the DCC and by the User is subsequently detailed however, and we propose that this Clause should be augmented to capture these requirements;

**H4.9c** - This clause should be augmented to reference Expelled and Withdrawn Users, as well as suspended Users;

**Anomaly Detection** – discussions regarding Anomaly Detection took place at the 6<sup>th</sup> November TSEG meeting, where it became clear that DECC's view of Anomaly Detection was restricted to "throttling". Our view is that Anomaly Detection is much broader than this and the SEC Legal Drafting should make this clear.

**H4.17** – this Clause implies that checking of Pre-Commands will stop as soon as an error is identified. We question whether it may be more efficient in such situations to continue to check the whole Pre-Command in order that all errors (if more than one are identified) can be reported back to the User for correction prior to re-submission. Further consideration may also need to be given as to the order in which these checks are conducted, in order to optimise the process; and

**H4.18 (Timing for the Processing of Service Requests)** implies that a model is being implemented whereby future dated messages are 'held' by the DCC until just prior to the future date, at which point they are sent to the meter. This seems to contradict earlier drafting which stated that for any CoS events etc all future dated commands would be removed. We note that this issue was discussed at the User Gateway Forum on the 13<sup>th</sup> November, at which point the DCC advised that they are still debating whether the DSP should 'hold on' to Requests or send Requests to the device for the device to hold on to. The Legal Drafting will need to be reviewed, and potentially amended, once this decision has been made and a consistent approach must be followed throughout the whole SEC document.

**Parsing and Correlation:**

**Q7 Do you agree with our proposed text for the SEC, with respect to Parsing and Correlation?**

*Yes, generally.*

We are pleased to note that security of the Parse and Correlate Software has been accounted for in a number of clauses, however we also note that whilst the DCC must ensure that the software has been subject to a software code review for the purpose of identifying any vulnerabilities in the code, no obligations have been placed upon the DCC to fix any vulnerabilities that may be found, nor to notify Users of these vulnerabilities. We believe that the drafting needs to be augmented to capture these additional obligations.

We note that Clause H11.5 places obligations on the DCC with regards to maintenance of the Parse and Correlate software, including releasing any new versions to such persons as require the software. It is important that Users of the Parse and Correlate software are notified of future releases in a timely manner in order to allow sufficient time to make any required changes. For example, upgrades to new version of Java that may be required in order to avoid incompatibility issues. We believe that the SEC Panel should be party to the Parse and Correlate Software update process, in order to ensure that this process is visible to all SEC Parties, and that any potential impacts upon Parties can be taken into consideration.

We support the proposal, detailed within Clause H11.6, that Users shall be consulted during the development of Parse and Correlate Software. However we believe that the drafting of Clause H11.6 needs to be further expanded to capture the action that the DCC is required to take with regard to consultation responses submitted. For example, if more than [50%] of users do not support the proposals outlined in the consultation then the proposal should not be implemented. In addition, we believe that Users should have a right of appeal to the SEC Panel regarding the DCC's decisions with regard to Parse and Correlate software, where they believe that implementation of a new version will have a material impact upon their organisation.

We note that the DCC is being obliged to provide assistance to Users in relation to Parse and Correlate software, subject to the User paying a charge for this service. Any such charge must be "reasonable" and the drafting of Clause H11.11 should be amended to reflect this.

**H11.14 (Right to Use the Parse and Correlate Software)** – we note that the drafting of this clause is designed to allow any person to have access to the Parse and Correlate freeware. We assume that this is the legal approach to the development and distribution of freeware, however, we ask that consideration is given to identify any potential consequences that may arise, around security or the gaining of a competitive advantage for example, before a final decision on this approach is established. However, when considering freeware we are concerned that the drafting also makes provision for the charging of Intellectual Property Rights, which neither seems appropriate in these circumstances or quantifiable under the current drafting. We therefore suggest that this reference is removed.

**Enrolment in the Smart Metering Inventory:**

**Q8 Do you agree with our proposed text for the SEC with respect to Enrolment in the Smart Metering Inventory and other associated processes?**

*Yes, generally, subject to the comments below and the output of the DCC Design Fora that are currently meeting:*

We are generally supportive of the text as drafted within the SEC that covers enrolment in the Smart Metering Inventory. However, our deliberations have led to the following comments and points of clarification that should be considered further.

**General Comments:**

The Definition of Type 1/Type 2 within this document does not reflect the definitions that are currently being used by TSEG and TSEG working groups, for example CPA. We believe that clarification regarding these definitions is therefore required.

Paragraph 45 of the Consultation document states that: "The Legal Text in Annex 6 (ie SEC Legal Drafting) including all references to Smart Meters, Smart Metering Equipment and Devices applies only to those that are SMETS2 or CHTS compliant as relevant. Arrangements for SMETS1 meters will be the subject of a separate consultation exercise". However, the SEC Legal drafting, for example section H5.1 does not clearly reflect this intent. Further clarification would be helpful. This legal drafting implies that SMETS1 meters will be eligible for enrolment with the DCC. Is this the intent?

Section H5 drafting does not seem to capture the scenario whereby devices are temporarily or permanently suspended, for example, due to a security issue for which there is not yet a suitable 'patch'. There should be an additional status in the SMI Inventory of "Suspended" to capture this scenario.

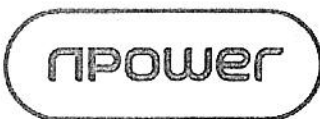
We are concerned that the Legal drafting, for example in section H5.14 appears to be introducing an "Install and Leave" process. Given that the debate regarding the feasibility of "Install and Leave" has not yet concluded, and indeed it has not yet been proven that it is even technically feasible, we do not believe that the inclusion of this process should be progressed at this time. It should be noted that the implementation of an "Install and Leave" process would have implications for SMICoP and Reporting Licence conditions that are already in place, as such installations would not count as "complete installs".

Section H5 drafting, particularly the early clauses, imply that the User has a lot of involvement in keeping the Inventory up to date. Could DECC please provide clarity regarding what level of involvement will be required by Users and what aspects will be automatically maintained and updated by the DCC, as this detail is not clear within the current drafting.

**Specific Comments:**

**H5.7b** – We do not believe that this clause is valid, as it will cause installation problems for Electricity Only Properties and Electricity First properties. We propose that this clause should be removed;





**H5.16** - Within the Inventory there needs to be a lookup on MPxN in order to enable searching of this data item to be undertaken. This requirement needs to be captured within the DUGIS for SR 8.2 Read Inventory;

**H5.19** – An additional clause H5.19c) is required to capture a requirement for DCC to provide feedback to advise that the Update SMI Status action has not been undertaken and why;

**H5.26** - Is this working days or calendar days? Need consistent usage of “days” throughout the document;

**H5.27** - Places an obligation upon Suppliers following the Commissioning of a Smart Meter or a Gas Proxy Function, to send a Service Request in respect of that Device to ensure that its Security Credentials which pertain to the Network Operator are those of the relevant Network Operator. We believe that it should be the Network Operator's responsibility to ensure that their Security Credentials held on the meter are accurate, not a Supplier's responsibility. We recognise the expedience and the fact that DECC has already designed this in, but note that this solution is ideal, not least as suppliers to a meter point change and the weakest supplier security is likely to be less than the weakest distribution network operator security.

**H5.29** - The reference to H5.27 should be H5.28, and in addition we believe that this clause should be augmented to include notification to the relevant parties that the status has been changed from 'pending' to 'decommissioned' or 'Withdrawn';

**H6.5** – Where the DCC rejects a Service Request as per Clause H6.5, the User needs to receive notification of this rejection. The SEC drafting should be augmented to capture this requirement;

**H6.6** –states “ For the avoidance of doubt, Devices forming part of an Enrolled Smart Metering System may remain Commissioned notwithstanding the Decommissioning of the Communications Hub Function, provided that a replacement Communications Hub Function is Commissioned within a reasonable period”

We do not believe that this is technically true as if the Communications Hub Function (CHF) is decommissioned then the Gas Proxy Function (GPF) must also be decommissioned, as they are part of the same device. It also follows that if you send a Decommission SR to DCC for the CHF then it should also contain the details of the GPF as well.

This process needs to be covered as part of the the development of the DCC User Gateway Interface specification (DUGIS) documentation, as without visibility of this supporting documentation it is impossible to agree to any process or associated SEC drafting. However, we believe that an appropriate solution would be one that establishes one decommissioning SR being sent to the DCC in order to fulfil this logical and technical decommissioning.

**H6.8 b)** – Whilst on the face of it this seems to be a pragmatic approach, we do have the following points for clarification:

- Is there the risk that any devices that are 'disassociated' will become stranded?



- What would happen with the 'disassociated' devices should the withdrawal status be updated to 'pending' etc?
- Would there be any record anywhere of the devices that were associated with the 'Withdrawn' device immediately prior to it being withdrawn?
- Changes may be required to this section once the processes surrounding DCC Opt In/Opt Out, that are envisaged to be included in a future consultation, have been determined; and

H7.14b – Typo - BG Companion Spec should read GB Companion Spec

**Intimate Communications Hub Interface:**

**Q9 Do you agree with our proposed text for the SEC with respect to the Communications Hub: Intimate Physical Interface?**

*We agree with and support the general concepts as drafted, and have further comments and points of clarification that we believe should be addressed.*

We are supportive of the proposal that the DCC should keep the ICHIS under review and should consult with Parties regarding whether the ICHIS remains fit-for-purpose. We note that the intent detailed within the consultation document, paragraph 202, is that SEC Parties should be consulted from time to time or on the SEC Panel's instruction, this aligns with SEC Section H12.5. However, our preference would be for such reviews to be undertaken at least annually and furthermore to always be undertaken whenever a change to the ICHIS is being proposed. In addition, it is important that reasonable consultation timescales are provided by the DCC, particularly bearing in mind that any ICHIS Change Proposals may have extensive and fundamental impacts that require thorough and detailed impact assessments to be undertaken with a number of industry players.

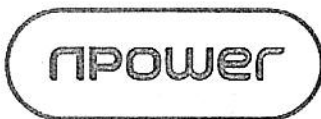
We are supportive of the inclusion of a process of Referral to the Authority (H12.7 – 12.8). However we note that as currently drafted Parties will only be able to refer the Report to the Authority on the grounds that the consultation to which that report relates, was not undertaken in accordance with the DCC's obligations, under the DCC Licence and SEC, in effect, that 'due process' was not followed. We believe that the Right of Appeal should be broadened to also enable Parties to appeal a DCC decision to the Authority where that decision has a material impact upon them.

We note that the SEC drafting references usage of a Communications Hub Hot Shoe, which DECC state within Paragraph 197 of the consultation document will be required "For a small number of premises or in certain scenarios (for example where space in a meter box is limited or where a gas Supplier is installing Smart Metering Equipment in advance of the electricity Supplier)". Whilst we acknowledge that the Hot Shoe may not be needed very often, we would like to stress that the design of the Hot Shoe needs to be undertaken with great care to ensure that it is safe. In addition, we note that there are still a number of issues requiring resolution regarding Hot Shoes, for example, the following scenario that was discussed at the Communications Hub Support Forum on the 6<sup>th</sup> November, but that was not resolved:

***Scenario:*** *where an electricity installation is undertaken, at a premises where there is already a gas smart meter with hot-shoe installed, is the electricity meter installer allowed to remove the hot-shoe and relocate the Communications Hub to the Electricity Meter and who is responsible for returning the hot-shoe to the gas supplier?*

We are assuming that these issues will be resolved by the Intimate Communications Hub DCC Design Forum, and will be captured within the ICHIS. Clarification of this assumption would therefore be helpful.





**DCC Service Management:**

**Q10 Do you agree with our proposed text for the SEC, with respect to DCC Service Management?**

*We are supportive of the general Service Management concepts, particularly where Information Technology Infrastructure Library (ITIL) principles are followed. We do however have some points for further consideration.*

We note that there is a possibility that certain modification proposals may impact both the DCC and Panel Release Management Policies and as such we ask that this potential is considered. We welcome the approach to follow the principles of the Information Technology Infrastructure Library (ITIL) for service management activities and ask that these form the basis of the DCC's approach in this regard. We note that SEC Clause H8.1(b) appears to suggest that alternative cost-efficient methods may be developed and would ask that these are only allowed where they do not degrade the ITIL principles in any way and that the panel will need to consider this aspect carefully before making any decisions in this regard.

We ask that consideration is given to the possibility that, if not substantially different, the two policies are combined into one central Release Management Policy that has two feeds, one from the DCC and one from the Change Board. This approach may be more cost effective and transparent. We consider that SEC Parties should be able to raise changes to the Release Management Policy in accordance with the SEC change governance, rather than via a Panel Representative (D10.9 - Panel to make available and consult on the Policy)

If these policies are to remain separate, we ask that consideration is given that there should be consistency between the availability of the two policies. Both policies must be made available to Users (D10.9 and H8.10) but only the DCC Policy notes that it must be made available to the TSC. Conversely, H8.10 does not note that the DCC Release Management Policy must be made available to the Panel.

We assume that only 'urgent' modifications resulting in a Release will be allowed during the Transition period, given that only urgent/ Fast track proposals will be allowed. If this is true then clarification is required as to when the Release Management Policies should be established.

Regarding modification proposals being 'flagged' as requiring a Release, is this something the Secretariat will have a role in? We note in F1.5 that the Secretariat will comply with a process established by the TSC to identify proposals that could impact the end to end architecture. Does this approach need to be extended to cover a Release, or already under the role of the Secretariat? SEC clause D1.7 (m) requires the proposer to provide a statement of whether the proposal will require changes to DCC Systems, User Systems &/or Smart Metering Systems; and

We believe that any 'down time' should be notified in advance to Service Users. The length of a period of outage can have a disproportionate effect that will ultimately impact suppliers' end consumers. There should therefore be consideration given to the provision of some form of compensation where down times' exceeds those planned.