



**SP ENERGY
NETWORKS**

Regulation & Commercial

By e-mail

Smart Metering Implementation
Programme
Department of Energy & Climate Change
3 Whitehall Place
London
SW1A 2AW

Your ref

Our Ref

Date
29th Nov 2013

Contact / Extension

Dear Colleague

A Consultation on New Smart Energy Code Content (Stage 2)

I am writing on behalf of SP Energy Networks in response to the above consultation paper issued on 17th October 2013. We welcome the opportunity to comment on the points raised.

We would draw your attention to our significant concerns over the security aspects discussed in section G. Whilst we understand the need to protect the smart metering system from misuse we believe a risk and role based approach would be more appropriate to ensure the correct security policy is applied to the correct processes.

I hope that this response is helpful, but please contact me if there are any queries

Yours sincerely

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A Consultation on New Smart Energy Code Content (Stage 2)
Detailed comments by SP Energy Networks, November 2013

Question 1: Do you agree with our proposed text for the SEC with respect to Technical Governance and Change Control? Please provide a rationale for your views.

We fully concur with the approach of creating a technical sub-committee. We would however, seek reassurance that this body will have sufficient resource to enable it to carry out its responsibilities without becoming a bottleneck for technical changes. In addition, we would seek reassurance that this sub-committee will have suitable representation from the DNO's, ideally via the Energy Networks Association.

Question 3: The DCC currently uses profile class data as a proxy to estimate the number of non-domestic meter points registered to users. Should this be replaced with a new data item which accurately reflects non-domestic meter registration, or should the DCC continue to use profile calls as a proxy? If you think it should be replaced, should the DCC rely on Suppliers providing this information separately, or should a change be sought to electricity registration systems to collect this data? Please provide a rationale for your views.

The addition of a new data item in the MPRS flow that specifies where a site is non-domestic would be a change to the currently defined interface between the DCC and MPRS and potentially between suppliers and MPRS. This would be a bigger change to MPRS than we have so far anticipated. We would therefore suggest that DCC continue to use profile class as a proxy until a long term solution is defined when the DCC takes responsibility for all registration data

Question 4: The SEC will include a requirement for RDPs to provide the DCC with a 'data refresh' on request, within a set number of days. Do you agree that it is sensible to measure in calendar days? If so, what is the impact of providing data refreshes to the DCC within two calendar days? If this has too significant an impact, what should the correct value be? Alternatively, do you believe it should be a set number of working days? If so, how long should this period be?

We do not agree that it is sensible to measure the 'data refresh' requests within a set number of calendar days. Whilst we understand that the DCC will be 24/7, 365 day a year operation, our own operational set up is not aligned to this and we will therefore be unable to meet these requests. We would prefer that the parameter was set within working days.

With regards to the two days discussed, it would depend entirely on the type of refresh that was requested (Full or Selective) and also the frequency as to whether or not we could make this deadline. In addition, the SEC makes no mention of a cap on the maximum refreshes requested per day.

Ideally we would like the refresh requests to mirror the MRA guidance below.

- REFRESH REQUEST MUST BE REPLIED TO WITHIN 1 WORKING DAY
- FULL REFRESH MUST BE SCHEDULED WITHIN 15 WORKING DAYS FROM RECEIPT OF REQUEST



- MOST LARGE REFRESHES WILL BE SCHEDULED TO RUN ON A FRIDAY NIGHT AT THE WEEKEND AT A TIME AFTER BATCH PROCESSING

Further clarification on the above will be necessary to allow us to make an informed decision on timescales.

With regards to a full DB refresh on our MPRS database, this is not an activity that we have ever carried out before. If required, we can raise a call with our support team to identify the size and the likely timescales to completion, however this will need to be done over a weekend and we would hope that this would be completed by the start of the working day on the Monday. We understand from another DNO that a full refresh for 3.5 million records was 692 Megabytes of data.

Question 7: Do you agree with our proposed text for the SEC with respect to Parsing and Correlation? Please provide a rationale for your views.

We would seek clarification on the supply of the parse and correlate software source code to "any person". The supply of the source code would seem to introduce an avoidable security risk to a key element of the smart meter infrastructure even where tamper checks are in place. We would also seek clarity on any charges which may be associated with the provision of the parse and correlate software.

Question 15: Does the inclusion of DCC aggregate performance measures in the SEC, and the consequential reduction in future service charges, appropriately balance the need for the DCC to manage its Service Providers flexibly with the need for DCC Service Users to have a say regarding performance targets? Please give reasons for your answer.

We agree with the need to include performance measures in the SEC and have a means to modify these in the future. We believe that we may see a need for more stringent performance metrics in time sensitive information, such as alerts, when systems are operational. We expect the benefits achievable to the DNO, in terms of power outage management, will decrease significantly in relation to any excessive delay to information being received. In addition, we believe there is also a need to have a metric which reflects the accuracy of information being received e.g. percentage of "false alarm" alerts and this will again materially affect the benefits to customers we can achieve with smart metering information.

Question 17: Do you have any comments on the security obligations set out in Section G of the SEC drafting or the way they are expressed?

We would seek greater clarity on the definition of "user systems". We would propose a definition which would narrow the scope of "user systems" to those systems which connect directly to the DCC interfaces. In addition, we would suggest an approach which is based on an assessment of security risk. Applying the security requirements outlined in Section G to all systems, involved in any stage of smart meter data handling, would be highly onerous and deflect attention from those areas which are deemed to be of highest risk from a security perspective. As a DNO we already connect to sensitive systems and apply significant security akin to that laid out in the SEC. However, our application of security is risk and role based rather than a blanket approach across all systems. We believe a similar approach should be taken with security relating to DCC access.



Question 18: Do you have any comments on the appropriateness and / or the proportionality of the security obligations in relation to particular types of DCC Service Users and their role?

As mentioned, we believe that a risk and role based approach is required in the area of security. Given that the DNO role has access to very limited sensitive data or critical commands we believe security should be applied proportionally to these specific roles. The majority of activities which will involve the querying of non-sensitive data, should have an appropriate but distinct level of security applied.

Additional Comments:

Paragraph 400: this paragraph implies that Alerts will incur an Explicit charge. This is a significant change from our original understanding that Alerts would be part of the fixed charges. We would request clarity on this point and a consultation on this change if it is to proceed.