Response to February 2016 SEC consultation

British Gas

Early Roll-Out Obligation

Q1 Do you agree that the proposed legal drafting implements the policy to introduce an Early Rollout Obligation on large suppliers by 17 February 2017? Please provide a rationale for your views.

Yes.

Q2 Do you agree that the proposed legal drafting implements the policy to introduce an obligation for domestic energy suppliers to become DCC users by 17 August 2017 and for new entrants to become a DCC User before supplying gas or electricity? If you disagree please provide a rationale for your views.

Yes. Without such an obligation on new entrants, all DCC User suppliers will have to maintain indefinitely inefficient processes to hand off alerts to these new entrants.

Q3 Do you agree that the proposed legal drafting implements the policy to introduce an obligation for DNOs to become DCC users by 28 April 2017? If you disagree please provide a rationale for your views.

Yes.

Special Installation Mesh Communications Hubs

Q4 Do you agree with the proposal and associated legal drafting to reflect matters related to the installation and maintenance of Special Installation Mesh Communications Hubs in the SEC? Please provide a rationale for your views.

We agree with the proposal and drafting.

We would now welcome further consultation on the CH Installation & Maintenance Support Materials (CHSM) in order to ensure standardised Supply Chain and Inventory Management of this Comms Hub in our supply chain (GUID/CHF Id). There is also a need to further discuss and agree obligations, liabilities and best practice when installing an external antenna in a customer premises.

Network Enhancement Plans

Q5 Do you agree with the proposal and associated legal drafting to reflect matters related to Network Enhancement Plans in the SEC? Please provide a rationale for your views.

We do not support the proposal given the limited detail provided in the consultation and limited prior discussion in the Programme.

As described in the consultation, the proposal seems to add a further layer of uncertainty and complexity to supplier processes. It represents a direct transfer of risk away from CSPs towards suppliers.

As such, we require assurances that the customer experience can be safeguarded. Currently, we are able to state a maximum resolution timescale to customers affected by a no WAN install. This ability is removed for some of those customers under the proposal given that we have no guaranteed timescales.

Our decision to install and leave is made on a risk basis, but we are able to issue standard guidance to our installers to do so under no WAN situations given the relatively short resolution timescales. Where we subsequently find out that a premises is part of an NEP we may have decided not to install and leave.

The consultation gives us no indication of the potential number of premises affected by NEPs today, or in the future, nor is it clear that safeguards exist which prevent CSPs from using the NEP process to protect themselves from failure against coverage SLAs.

We suggest a detailed discussion is held at the relevant DCC Design Forum before this policy is considered further.

User to non-User churn

Q6 Do you agree with our approach that no changes are required to the Supply Licence Conditions as a result of churn of SMETS2 SMSs from DCC Users to non-DCC Users?

Yes.

Enduring Change of Supplier

Q7 Do you agree with the 'minded to' position to align the start of the feasibility and design of the ECoS process with the Blueprint phase of CRS with the aim of linking the design and build of the ECoS system with CRS development? Please provide a rationale for your views.

Yes.

Q8 Do you agree with the 'minded to' proposal for suppliers to take reasonable steps' to start to use ECoS from the point at which it becomes available? Please provide a rationale for your views.

It is too early to support this view given that we have not yet worked through the detail of an optimal development and implementation process for Enduring CoS, individually or as an industry.

Q9 Do you agree with the principle of suppliers completing the move to ECoS within 6 months of the end of roll out i.e. 2020 or earlier? Please provide a rationale for your views.

We have no view on this currently but would appreciate further clarity in the proposed timescales. Does DECC intend this deadline to be in the last six months of rollout, or the first six months of 2021? The wording of the question is unclear.

Q10 Do you agree with the proposal for DECC to establish an industry working group under the transitional arrangements that will subsequently transfer to industry at a point to be agreed as part of the wider transitional arrangements? Please provide a rationale for your views.

Yes, this seems sensible. We suggest this should be the first step to help in answering question 7, 8 and 9.

DCC Additional Support

Q11 Do you agree with the proposal to extend the scope of H14.33 to allow the DCC to also provide Testing Participants with assistance with issues related to User Systems and Devices and allowing this assistance to be provided during or after testing?

Yes.

Q12 Do you have any views on how Additional Support services should be charged for?

We would support a charging arrangement (as indicated by the consultation document) which targets the cost at those Users who take up the service.

Further Requirements on Testing

Q13 Do you agree with the proposal and associated legal drafting to set a mandatory requirement on the DCC to provide a Pre-UEPT service and a GFI service? Please provide a rationale for your views.

Yes.

Q14 Please provide your views on the draft direction for the insertion of a new X9 and the proposal to:

- bring the new X9 into effect on18 April 2016 (or as soon as possible thereafter),
- require the provision of the Pre-UEPT service from the date that X9 is effective,
- require the provision of the GFI service as soon as reasonably practicable, but in any event no later than the start of End-to-End testing,
- provide that the Pre-UEPT and GFI service will end when Section X ends, noting that the Secretary of State has the ability to direct an earlier end date?

Please provide a rationale for your views.

In principle we have no objections to the proposed insertion of a new X9. The continued availability of GFI would be useful for meter manufacturers new to the market, but its value should also be considered in providing advance industry testing of Release 2 and equivalent

subsequent releases.

Q15	What are the benefits of providing Pre-UEPT services beyond the go live date for Release 1.3 functionality? Please provide a rationale for your views.

The main benefit is to provide the ability to regression test changes against a known state (the simulator) rather than interacting with meters.

Also, this method supports the early testing of new functionality in the same way for Release 2 (and beyond) when introduced by the SEC mod process.

We would therefore support the extension of Pre-UEPT beyond R1.3.

Q16	Do you agree with our proposed amendments for additional SIT, Interface Testing and SRT Testing? Please provide a rationale for your views

Yes.

Q17	Do you agree with our proposed amendments for the length of the End to End Testing Period? Please provide a rationale for your views.

Yes.

Q18	Do you agree with our proposed amendments for additional phases of Service Request testing? Please provide a rationale for your views.

Yes.

Q19	Do you agree with our proposed amendments to the relevant versions of the SEC for testing purposes? Please provide a rationale for your views.

Yes.

SEC Panel and DCC Live Criteria Assessment

Q20	Do you agree with the proposal and associated legal drafting? Please provide a rationale for your views.

Yes.

Security

Q21	Do you agree with the proposed approach and legal drafting that seeks to ensure that only disputes associated directly with the issue of compliance with Section G are determined by us, with other disputes following the “normal” path for resolution?

Yes.

Q22	In relation to the need for DCC to test and monitor the security of Cryptographic Credential Tokens, do you agree with the proposed approach and legal drafting?

Yes. We agree with the approach. DCC should also inform Authorised Subscribers of the various compatible Operating Systems and any time that there is change to these requirements, not only where vulnerability emerges. The Hardware token must be able to operate under different Operating Systems.

Q23	In relation to the removal of Manufacturer Release Notes from the CPL and the associated requirements for secure storage, do you agree with the proposed approach and legal drafting?

Yes.

Q24	In relation to the inclusion of systems used to generate a UTRN within the scope of the User System, do you agree with the proposed approach and legal drafting?

Yes.

Privacy and Explicit Consent

Q25	Do you agree with the proposal to include a definition of Explicit Consent and do you have any comments on the proposed drafting? Please provide a rationale for your views.

Yes.

Changes to Section H (DCC Services)

Q26	Do you agree with the proposal and associated legal drafting to consult with Parties and Registration Data Providers prior to changes to DCC Internal Systems or the Release Management Strategy? Please provide a rationale for your views.

Yes.

Q27	Do you agree with the proposed change to remove the requirement on RDPs to raise an Incident where the issue can be resolved by the transmission of an unsolicited registration data refresh file? Please provide a rationale for your views.

Yes.

Q28	Do you agree with the proposals and associated legal drafting to the recovery and data loss obligations in regard to a Disaster? Please provide a rationale for your views.

Yes, as long as this does not create a loophole which can be applied to all situations under Disaster Recovery. To give Users additional certainty, it would be helpful if DCC could

indicate explicitly in its Incident Management Policy those situations where it believes it would not meet the 8 hour SLA.

Rectifying Errors in Relation to Device Credentials

Q29 Do you agree with the proposal to clarify that Users are permitted to send the relevant Service Requests? Please provide a rationale for your views.

Yes.

Panel/IKI Subscribers

Q30 Do you agree with the proposal and associated legal drafting to permit SECCo to become a Subscriber for IKI File Signing Certificates for the purposes of Digitally Signing the CPL as set out above? Please provide a rationale for your views.

Yes. We agree to the proposed approach and legal drafting: No objection to SECCo becoming an IKI subscriber for CPL File Signing.

Status of Associated Devices

Q31 Do you agree with the proposals to remove the requirement for DCC to modify the SMI Status of a Device in circumstances where the status of a Device with which is associated changes, and to clarify by when suppliers must ensure that the appropriate Device Security Credentials are placed on a Device? Please provide a rationale for your views.

Yes.

Post Commissioning Reporting

Q32 Do you agree with the proposal to change the reporting obligations on DCC in relation to Devices Commissioned between DCC Live and Release 1.3? Please provide a rationale for your views.

Yes.

Subscriber Obligations for certain IKI File Signing Certificates

Q33 Do you agree with the proposals to modify the subscriber obligations in relation to Certificate Signing Requests generated by DCC-provided software and to place an additional obligation on DCC in relation to these in Section G?

Yes. we agree with the proposal

RDP IDs and DCC Reporting under Section E

Q34 Do you agree with the proposal not to make transitional changes to the SEC to deal with these matters and instead to rely upon RDPs and the Panel to work with DCC within the confines of its Systems Capability on a transitional basis?

Yes. In the same way, the proposed restriction of Supplier User IDs should be dealt with on a transitional basis to ensure that this capability is given sufficient priority at Release 2.

Miscellaneous Issues and Minor Amendments to Drafting

Q35 Do you agree with the proposal legal drafting amendment to C3.13? Please provide a rationale for your view.

Yes.

Q36 Do you agree with the proposed legal drafting amendments to Section E2? Please provide a rationale for your view.

Yes.

Changes to provide flexibility to accommodate changes arising during testing

Q37 Do you agree with the proposal to remove these documents from the SEC and to re-introduce them (including any enduring changes made using Section X) by designation under Condition 22/Section X5 of the SEC?

Yes.

Test Communications Hubs

Q38 Do you agree with our proposal and legal drafting in relation to Test Communications Hubs? Please provide a rationale for your response.

Yes, although our view is dependent on the implementation of the Instrumented Comms Hub Change Request.

The revised definition goes some way to giving greater certainty to suppliers, but we would welcome further documented definition on the "variations in functionality that the DCC reasonably considers appropriate." This could be via DCC controlled documentation rather than further expanding the SEC definition, and would benefit from alignment with the current Instrumented Comms Hub Change Request.

Consistent terminology on "all reasonable steps"

Q39 Do you agree with the proposal and associated legal drafting to align the wording of obligations throughout the SEC?

Yes.

Incident Management Policy

Q40 Do you agree with the proposed changes to the Incident Management Policy? Please give reasons to support your answer.

Yes.