



Key:

Guidance, cell completed by RFC Initiator
Guidance, cell completed by Design and Delivery Admin & Secretariat (A&S) Teams
Guidance, cell completed by other SMIP parties

Section 1: Cover Sheet

1.1 RFC Title	Proposed changes to the SEC Subsidiary Document (SSD)		
1.2 RFC Reference ID	TBDG CR 83		
1.3 Related RFC Reference IDs			
1.4 RFC Initiator	1.4.1. SMIP party raising request	DCC	
	1.4.2. Change Co-ordinator	Robin Seaby	
	1.4.3 Contact Email Address	Robin.Seaby@smartdcc.co.uk	
1.5 Products Impacted by RFC	Consultation to introduce additional changes to the: <ul style="list-style-type: none"> - DCC User Interface Specification (DUIS) - Appendix AG – Incident Management Policy (IMP) - Appendix AA – Threshold Anomaly Detection Procedures - SMETS1 Supporting Requirements 		
1.6 Parties Impacted by RFC	SEC Parties, DCC, Energy Suppliers, Network Operators, Other Service Users, and Registered Supplier Agents		
1.7 High Level Indicative Impact Assessment	Initial Assessment by RFC Requestor	Validated Assessment by A&S Teams	
	1.7.1 Impact Level	Low	
	1.7.2 Priority Level	Medium	

RFC Process Tracker (completed by Design and Delivery Admin & Secretariat)		
RFC Process Step	Date Step Started	Date Step Finished
Step 1 – Initiation		
Step 2 - Validation		
Step 3 – Consultation		
Step 4 – Decision Making		
Step 5 - Implementation		



Section 2: Detail of Proposed Change

2.1 RFC Summary

DCC proposes a change that be made to the DCC User Interface Specification (DUIS):

- During 2018, DCC Customers raised queries on how DUIS Export Service Requests should be configured, when the DCC Import Supplier and DCC Export Supplier Roles are different Supplier Parties.
- DUIS wording was examined within this context and a small drafting change was discussed with BEIS.
- As no DCC Customers are using DCC Export Service Requests, it was proposed that this small wording change should be made as part of the next planned DUIS uplift, DUIS 3.0.
- For the avoidance of doubt,
 - there is no system change associated with this drafting amendment, but this drafting amendment is drafted to provide clarity in that the revised text reflects how to configure DUIS Export Service Requests whether the Export and Import Supplier role is held by the same Supplier Party, or by different Supplier Parties.
 - It is proposed to include the drafting to DUIS 3.0 which primarily includes changes that relate to the enrolment of SMETS1 meters into the DCC systems, but these proposed changes are not related to the enrolment of SMETS1 meters.

The change is proposed to be made to the DUIS 3.0 document that has been baselined in December 2018 by TBDG and which BEIS will consult on a proposal to designate ahead of a DCC SMETS1 Service being made available. While the changes that are being proposed are not SMETS1 changes, DUIS 3.0 is being managed by TBDG which is the reason that this process is being used to consult on the changes. The changes will be sent to all SEC party leads, the SEC Panel, Ofgem and other interested parties.

DCC proposes further changes to the Incident Management Policy (IMP). The current provisions of the Vodafone Limited contract aren't capable of being met with the current arrangements in the SEC. The propose changes will bring the SEC into line with the Vodafone Limited contractual arrangements within acceptable parameters of time and costs.

- Table 1 that covers all Incident categories has been amended to reflect the Vodafone contractual arrangements.
- Provision has been made for the Business Continuity and Disaster Recovery specifically relating to Vodafone.
- Provision has been made for Planned Maintenance that specifically relates to Vodafone

DCC is proposing minor, consequential changes to the Threshold Anomaly Detection Procedures to reference the changes that are set out in the SMETS1 Supporting Requirements document.

This change request invites views from stakeholders on the proposed amendments to the baselined SSDs. In particular, we are inviting responses to the following consultation question:

1. Do you agree with the proposed amendments to the DCC User Interface Specification (DUIS)?
2. Do you agree with the proposed amendments Appendix AG – Incident Management Policy (IMP)?
3. Do you agree with the proposed amendments Appendix AA – Threshold Anomaly Detection Procedures?



	<p>4. Do you agree with the proposed amendments to the SMETS1 Supporting Requirements?</p> <p>The consultation will run from 15 April 2019 to 10 May 2019, with responses due by 17:00 on 10 May 2019.</p>
<p>2.2 Essential Background</p>	<p>In November 2017, DCC issued a consultation on amendments of a first tranche of SEC Subsidiary Documents (SSDs) that, in conjunction with amendments to the main sections of the SEC, will define the User impacting elements of DCC's SMETS1 Services. The findings and conclusions of this consultation were shared with industry at the TBDG Enrolment and Adoption (TBDG) Sub-Group in February 2018, and they were added to the design baseline. Since this baselined version there have been various changes that have been made to:</p> <ul style="list-style-type: none"> - DCC User Interface Specification (DUIS); - Message Mapping Catalogue (MMC); - Service Request Processing Document (SRPD); and - SMETS1 Supporting Requirements (S1SR) <p>This RFC covers further proposed changes to the baselined version of DUIS in order to address queries that have been raised by industry relating to how DUIS Export Service Requests should be configured, when the DCC Import Supplier and DCC Export Supplier Roles are different Supplier Parties.</p> <p>The amendments that are being proposed to the baselined version of DUIS are as follows at section 3.8.101.4:</p> <p>This RFC further covers amendments that are proposed to the IMP to make provision for changes that are required to bring the SEC in line with the contractual obligations within the Vodafone Limited contract in a manner that is acceptable for both time and costs. These changes include changes relating to the applicability of Section H10.13 and that for H8.4 DCC will be required reasonable steps to restore any and all affected Services. There are also changes related to the SMETS1 SM WAN where Vodafone is the relevant Service Provider.</p> <p>This RFC further covers proposed amendments to the S1SR. On 26 March 2019 BEIS published a consultation on proposed amendments to Section G of the SEC relating to Cryptographic Processing in respect of SMETS Devices. This consultation included certain provisions that will only apply to Cryptographic Processing carried out by a SMETS1 Service Provider that involves the use of a Symmetric Key and where the target Device is identified in S1SR as either a Category 1 Device or a Category 2 Device. DCC is now proposing to include definitions for these terms as set out in the Definitions in the S1SR.</p> <p>DCC proposes that these Threshold Anomaly Detection Procedures changes to the S1SR will only be made in the event that BEIS decides to proceed with the associated changes to Section G of the SEC, following consideration of consultation responses.</p>
<p>2.3 Options Summary</p>	<p>We are consulting for a three-week period from 12 April 2019 and are seeking views by 10 May 2019. Subject to stakeholder views on the proposed changes, DCC will request at the TBDG sub-group that the updated version of the DUIS, IMP, S1SR and TADP are added to the Release 3 design baseline so additional certainty in these elements of the design may be provided, before re-designating</p>



	<p>these documents at the appropriate point in time as determined by the Secretary of State, pursuant Condition 22 of the DCC Licence and Section X5 of the SEC.</p>
<p>2.4 Recommended Option</p>	<p>To approve the new versions of the documents.</p>
<p>2.5 Summary Impact Assessment of Recommended Option</p>	<p>Changes are required to clarify how to configure DUIS Export Service Requests whether the Export and Import Supplier role is held by the same Supplier Party, or by different Supplier Parties.</p> <p>Proposed changes to the Threshold Anomaly Detection Procedures to reference the changes that are set out in the SMETS1 Supporting Requirements document.</p> <p>Changes are required to the IMP to make provision for specific changes that are required to the SEC as a result of contractual obligations that are set out in the Vodafone contract.</p> <p>Changes to the S1SR to define Category 1 Device and Category 2 Device for the purposes of Section G of the SEC.</p>
<p>2.6 Summary Impact Assessment of not adopting change</p>	<p>TBC</p>
<p>2.7 Other Recommended Next Steps (Optional)</p>	<p>None expected</p>



Section 3: Individual Impact Assessments by other SMIP Parties (if required)

3.1 SMIP Party carrying out Impact Assessment	
3.2 Summary Impact Assessment	



Section 4: Summary of Impact Assessments

<p>4.1 List of SMIP Parties who completed Impact Assessments</p>	<p>EON SSE SSEN EDF</p>
<p>4.2 Summary Impact Assessment</p>	<p>One of the parties agreed with the proposed changes.</p> <ul style="list-style-type: none"> Parties pointed out that the headings in Table 1 of Appendix AG, the Incident Management Policy were incorrect. We have amended these headings to reflect the correct heading. <p>There was a query on the loading of ADT values using SSI Sprint 14.</p> <ul style="list-style-type: none"> Section 3.4 of Appendix AA, the Threshold Anomaly Detection Procedures requires Users to provide the Anomaly Detection Thresholds File by email. The SSI Sprint 14 is accordingly not applicable as this section sets out the procedure. If this changes in the future, DCC will modify the SEC accordingly. <p>A response raised a query around the 7-day obligation in the S1SR to install Network Operator certificates, specifically on how it was reported on and managed.</p> <ul style="list-style-type: none"> The SEC does not currently set out any obligations in this regard. However, we will take this comment on board for consideration. <p>There was a comment that where possible the Vodafone obligations that are set out in the SEC should align with SMETS2 processes.</p> <ul style="list-style-type: none"> We agree with this statement and have endeavoured to align the processes, however, where there are contractual terms that differ from other SEC obligations it has been necessary to vary the SEC accordingly. <p>There was a query about the manner in which Vodafone and DCC would assign Incident Categories as Vodafone and DCC might not align in their interpretation of incidences</p> <ul style="list-style-type: none"> DCC assigns all Incident Categories and this will be done in the same manner in which it is done for all other service providers. To be clear, Vodafone will not assign the Incident Category. <p>A response requested that changes that relate to MOC and FOC should be identified as such.</p> <ul style="list-style-type: none"> DCC will endeavour to create clarity as to which cohort changes apply. <p>A respondent raised a query as to why the steps to be taken in Clause 6.2 of the Incident Management Policy was “reasonable steps”.</p> <ul style="list-style-type: none"> DCC will endeavour to ensure that there is continuity of services, however, this falls outside of the sphere of influence of DCC and DCC is therefore unable to provide any guarantees that services will be restored in certain timeframes. DCC is however committed to having the service running and will therefore endeavour to ensure that services are restored by taking all reasonable steps. <p>A respondent raised a concern that Clause 7.2 of the Incident Management Policy provided for a 4 day notice period for Maintenance to parties.</p> <ul style="list-style-type: none"> The four-day notification is indeed due to contractual constraints and forms part of their standard conditions. As this is embedded in the Vodafone system, reflecting their current procedures, it was not viable to amend the contractual obligation to reflect the obligations that are contained in the



	<p>SEC. It is therefore necessary to change the SEC to reflect the contractual position that DCC has entered into with Vodafone.</p> <p>There was a query about additional changes to DUIS v3.0 that were not included in the consultation.</p> <ul style="list-style-type: none"> • The changes to DUIS v3.0 are either the rectification of typographical errors or are related to DUIS export service requests. • To clarify, the changes that were identified that relate to SecondaryImportMPAN and ExportMPAN are just a clarification as a result of the Export changes. The SecondaryImportMPAN is not a mandatory item – even if the device is a Twin Element meter. It has therefore been changed to simply say “No” for the heading “Mandatory”.
<p>4.3 Initial Recommendation (Optional)</p>	



Section 5: Decision Making

5.1 Record of IMF/TBDG/TSEG/TPMAG/Regulatory Group Review	
5.1.1 Further Analysis Required	
5.1.2 Consensus Reached	
5.1.3 Record of BEIS (Chairperson) decision	
5.1.4 Record of escalation choice made – route and date	
5.2 Record of SMDG Review (if required)	
5.2.1 Consensus Reached	
5.2.2 Record of BEIS (Chairperson) decision	
5.2.3 Record of escalation choice made – route and date	
5.3 Record of SMSG Review (if required)	
5.3.1 Consensus Reached	
5.3.2 Record of BEIS (Chairperson) decision	
5.3.3 Record of escalation date	
5.4 Record of BEIS Decision (if required)	
5.4.1 Record of decision made	

Section 6: Implementation

Implementation Actions	
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