

Consultation on Enduring Testing Approach Document: SMETS1 Pending Product Combinations Tests Security Fast Track

Consultation opens: 27 June 2019
Consultation closes: 11 July 2019

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1 Introduction

In August 2018 DCC consulted on the User Testing Services Approach Document (UTSAD), which sets out the arrangements for the testing of SMETS1 Services by Testing Participants. Alongside this document, we also consulted on changes to the Enduring Test Approach Document (ETAD) and the Common Test Scenarios Document (CTSD); two Subsidiary Documents to the Smart Energy Code (SEC) which were updated to reflect requirements for SMETS1 testing.

The consultation closed on 21 September 2018 and our conclusions document to that consultation was published on the DCC website.¹ The following documents were re-designated by the Secretary of State on 13 March 2019:

- SEC Appendix J - Enduring Test Approach Document V1.3
- SEC Appendix R - Common Test Scenarios Document V1.4

In our consultation response and report to the Secretary of State, we recognised the need for possible amendments in the ETAD relating to the Pending Products Combination Testing (PPCT) process where PPCT needs to be fast tracked (or even bypassed) on security grounds and proposed to consult on those revisions to ETAD.

Pending Product Combination Tests (PPCT) is an enduring service that covers any new DMCs that are created by a change to the components of a DMC on the list of Eligible Product Combinations (EPCL). There is no requirement for Suppliers to submit for PPCT any SMETS1 Devices in the final version of the Deployed Products List, agreed with DCC, for each capability release. The DMCs on the agreed Deployed Product List that are not selected for SIT will undertake a DCC internal activity - DMCT - using the same tests as PPCT to confirm their interoperability prior to these being progressed onto the EPCL.

Since submission, we have discussed with several stakeholders the potential changes to give effect to requirements to support the fast tracking of PPCT on security grounds, developed our proposals and have proposed amendments to the ETAD to reflect this. These amendments also require a consequential change to SEC Appendix AB (Service Request Processing Document).

This consultation is seeking views on our proposed amendments to the ETAD and SEC Appendix AB, which are set out in Section 2 below and with proposed drafting changes shown in Annex B and Annex C.

2 Proposal

2.1 Security: ETAD Section 9.15 & 9.16

Section 9 in Version 1.3 of the ETAD, as submitted to BEIS, does not currently include provisions for PPCT in cases which need to be fast tracked on security grounds. Specific circumstances under consideration are those whereby firmware changes need to be deployed urgently to address security concerns, resulting in a new SMETS1 Device Model Combination (DMC). In such

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/formal-submission-of-uts-regulatory-documents/>

circumstances, it is recognised that a Supplier may seek to deploy new firmware to the Device Model Combination as soon as it is available, rather than first seeking to assure through PPCT that the new DMC continues to interoperate with the DCC solution. However, the Supplier might also seek to progress testing of that DMCT through PPCT on a priority basis, to provide evidence that such continued inter-operation is assured, as soon as possible.

We propose that:

1. Before a Testing Participant can request PPCT is prioritised on the grounds that the new DMC arises as a result of the need for an urgent firmware upgrade on security grounds, the Testing Participant will need to go to the Panel's Security Sub-committee (SSC) for its view on whether the urgent firmware upgrade is required to appropriately improve the security of the DMC they are requesting is fast tracked.
2. Where a Testing Participant provides DCC with evidence that the SSC has confirmed that in its view, the urgent firmware upgrade is required, a Testing Participant may request that the DMC is prioritised by DCC when it receives the request from the Testing Participant for the DMC to put through PPCT. DCC then has an obligation to prioritise the testing of that DMC. Where this results in previously notified PPCT start dates changing, then DCC will notify the affected Testing Participant(s) of the revised dates in accordance with Section 9.10 of the ETAD.
3. DCC has an obligation in Section H5.9 of the SEC to process Service Requests in respect of SMETS1 Smart Metering Systems, that include a DMC that is listed on the SMETS1 Eligible Product Combinations (EPCL). Amendments are proposed such that this obligation also applies to DMCs not listed on the EPCL where these types of DMCs have arisen because of the application of an urgent firmware upgrade (as confirmed by the SSC), except to the extent that DCC's inability to process any Service Requests arises as a result of the application of the firmware upgrade. For this purpose, the drafting also contains requirements for DCC to make reasonable assumptions about how any Smart Metering Systems comprising this new DMC operate, to the extent that any additional information on this has not yet been added to the S1SR as the DMC has not yet progressed through PPCT.

Question 1:

Do you agree with DCC's proposal and the associated drafting changes to the ETAD (for paragraphs 1 and 2 above) and the Service Request Processing Document (for paragraph 3 above) set out in Annex B & Annex C? Please state the reasons for your view.

2.2 Consequential Amendments

Security: ETAD Section 9.2

Section 9.2 of the ETAD also contains a consequential amendment to require the Testing Participant to indicate whether it is requesting that processing of the DMC through PPCT is prioritised due to the urgent firmware upgrade arising on security grounds.

We have also amended Section 9.3 to remove an erroneous cross reference.

In order to introduce these amendments to the SEC Appendix J (ETAD) and to SEC Appendix AB (Service Request Processing Document) , it is necessary to re-incorporate the documents into the SEC, under powers held by the Secretary of State set out in Section X of the SEC.

In order to expedite the re-designation of the SEC Appendix J and SEC Appendix AB, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the ETAD and SEC Appendix AB, being 28 July 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) as well as the draft direction which is presented in Error! Reference source not found. of this consultation document for stakeholder consideration.

Question 2:

Do you agree with the proposed re-designation date of 28 July 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the ETAD & SEC Appendix AB using the draft direction in Annex A?

3 How to respond

Please provide responses to the proposed changes to the ETAD by 17:00 on 11 July 2019 to DCC at consultations@smartdcc.co.uk.

If you have any questions about the consultation documents, please contact Ofordi Nabokei at ofordi.nabokei@smartdcc.co.uk.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state whether all, or any part, of your consultation response is confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department of Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

4 Annexes

- Annex A Draft Secretary of State Direction
- Annex B SEC Appendix J Enduring Testing Approach Document (marked changes)
- Annex C SEC Appendix AB Service Request Processing Document (marked changes)

Annex A

This annex contains the draft direction and re-designation text that BEIS intend to utilise for re-designation of the ETAD and for SEC Appendix AB (Service Request Processing Document).

Draft Re-designation Text

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

- a) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DATE], the Enduring Testing Approach Document previously designated and incorporated into the SEC as Appendix J is hereby re-designated and incorporated in the form set out in Annex B to this direction.
- b) Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DATE], the Service Request Processing Document previously designated and incorporated into the SEC as Appendix AB is hereby re-designated and incorporated in the form set out in Annex C to this direction.

For the avoidance of doubt such re-designation of the Enduring Testing Approach Document and the Service Request Processing Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.