

SMETS1 Consultation on regulatory changes to the TMAD - SMETS1 Device Security Testing and Notification Periods – April 2020

A consultation on changes to the SMETS1 Transition and Migration Approach Document (TMAD) to support the security testing for SMETS1 Devices and change to notification periods.

Date:	28 April 2020
Classification:	DCC Public
Respond by:	1600 on Friday 15 May 2020
Filename:	DST&Notification_Consultation_issued

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1 Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems.

The detailed technical and procedural requirements of the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is included in the Smart Energy Code¹ (SEC) as Appendix AL and the latest version was included in the SEC on 13 March 2020 as Version AL3.0.

The current TMAD (AL3.0) covers requirements for the initial operating capability (IOC) and Middle Operating Capability (MOC - MDS) for SMETS1 Services. Subsequently, there are a limited number of changes to the TMAD that are required for the Middle Operating Capability (MOC - Secure) and Final Operating Capability (FOC) and DCC also recently concluded on changes to the TMAD related SMETS1 Uplift 1.1. BEIS recently re-designated the TMAD to provide for a small number of changes in support of MOC (MDS) and DCC is planning to conclude on the TMADs for Secure and FOC in May 2020.

This consultation document is seeking views on changes to the TMAD that set out an approach to the security testing of SMETS1 Devices.

2 SMETS1 Device Security Testing

Currently, DCC conducts security testing in respect of the Modified DCC Total System in accordance with Clause 6 of the SEC Appendix AK - SEC Variation Testing Approach Document for SMETS1 Services. This includes functional testing i.e. that a message to a SMETS1 Device provides for the correct behaviour. However, as part of demonstrating that the Modified DCC Total System remains secure, DCC considers that specific additional negative security testing is required.

DCC is proposing to include a specific new Clause 17 in the TMAD on SMETS1 Device Security Testing presented within Attachment 3 of this consultation. There are also the relevant new definitions within Clause 2 of the TMAD. These changes allow the scope of testing to be defined for security testing of SMETS1 Devices as a risk mitigation activity given the evolution of the SMETS1 ecosystem. It is proposed that DCC would prepare a draft SMETS1 Devices Security Testing Scope and Timetable Document setting out the nature and timetable of testing. This would be discussed and reviewed by the SEC Panel Security Sub Committee and would include negative security testing of SMETS1 Devices and potentially positive security testing (to the extent not already tested under other arrangements).

DCC plans to conduct the SMETS1 Device Security Testing on SMETS1 Devices in test laboratories and the testing will not touch any other part of the DCC Total System. DCC would take reasonable steps to complete the testing but would be dependent on the

¹ The current SEC is available via the SECAS website - www.smartenergycodecompany.co.uk/the-smart-energy-code-2/.

availability of appropriate SMETS1 Devices for testing, and the co-operation of relevant Supplier Parties to the necessary parties.

Given responsibility for SMETS1 Devices rests with the Supplier, the TMAD provides DCC with deemed consent to test Devices from each relevant Supplier Party. Such consent will allow DCC to proceed on the understanding that all necessary consents are in place to enable testing to take place.

It is important to be clear that in conducting this security testing of SMETS1 Devices, DCC does not warrant or represent that the SMETS1 Device Models or combinations of SMETS1 Device Models operate or do not operate in a particular way when comprising part of an Enrolled SMETS1 Smart Metering System. Responsibilities for ensuring that an Enrolled SMETS1 Smart Metering System is at all times secure remains with the Supplier Party in accordance with Supplier Licence Condition and SEC Section G. Accordingly, the testing which DCC conducts will be focused upon protecting the DCC Total System from risk and its conduct should not be interpreted as changing the underlying responsibilities which different SEC Parties may have in connection with security.

The outcome of this device security testing will be reported by DCC to the Secretary of State (and copied to the SSC) within one or more documents titled 'SMETS1 Device Security Testing Completion Report'. The proposed drafting does not set out the steps to be taken by the Secretary of State (and/or SSC) based on provision of such a report. DCC has discussed the envisaged next steps with BEIS. DCC understands that the Secretary of State will consider the matters set out in any SMETS1 Device Security Testing Completion Report and then decide on the steps that they consider appropriate.

DCC has engaged with the SEC Panel Security Sub Committee and their views have been taken into account in preparing this consultation.

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Q1

Do you have any views on the proposals related to security testing for SMETS1 Devices? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

3 Notification Periods

The TMAD regime for SMETS1 Installations containing Dormant Devices provides for notification regarding the upgrade of firmware or application of configuration as well as prior notice for Migration of each SMETS1 Installation. These periods are presently set to 15 working days within Clause 4.29 and Clause 4.30 of the TMAD; a total of 30 Working days as these are performed sequentially. These timescales were put into the TMAD prior to any Migrations being performed without any insight into the actual extent that a Responsible Supplier would need to engage in these processes.

Since Q3 2019, DCC has been operating this regime and now comprehends Responsible Supplier behaviour and engagement with these processes / timelines. DCC considers that this length of time is not required and that a shorter timescale for notifications still gives Responsible Suppliers ample time to review the notifications and respond if required whilst allowing the DCC to keep pace and achieve targets.

In summary, based on operational experience and discussions with stakeholders, DCC is proposing to reduce each of these notifications to be 5 working days, this reducing the total period by 20 working days.

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Do you have any views on the proposals related to reducing notification periods related to Dormant Devices? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

4 Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department of Business, Energy and Industrial Strategy (BEIS) an amended version of the TMAD that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC will conclude on this consultation; DCC is aiming to providing a report to BEIS no later than Friday 22 May 2020. DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, BEIS will re-designate the TMAD on Friday 29 May 2020 or as soon as reasonably practicable within one month.

It is important to note that depending on the responses received, one set of changes may be deployed at a different time to the other. Therefore, rather than hold up deployment of both sets of changes to the TMAD, DCC may propose to BEIS that the changes to the TMAD are made at different times to each other such that individual changes are capable of going live at separate times. In such circumstances it is proposed that BEIS could re-designate these changes to the TMAD on different days, so long as such designations occur within one month of Friday 29 May 2020. Should any change need to occur outside this window, then a separate consultation on a subsequent designation date would be required.

In order to expedite the re-designation of the TMAD, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the TMAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

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Q3

Do you agree with the proposed re-designation date of Friday 29 May 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

5 How to respond

Please provide responses in the attached template by 1600 on Friday 15 May 2020 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as 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.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

6 Attachments

- Attachment 1 – TMAD Draft Notification Text
- Attachment 2 - Response Template
- Attachment 3 - SMETS1 Transition and Migration Approach Document AL V4.1 draft (change marked against V4.0 draft)

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the TMAD.

TMAD Draft Direction 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.

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 [DD MMM YYYY], the SMETS1 Transition and Migration Approach Document previously designated and incorporated into the SEC as Appendix AL is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done 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.