



SMETS1 Consultation on changes to enable Emergency CPL SMETS1 entries

DCC consultation on changes to the SEC relating
emergency CPL entries for SMETS1 DMCs

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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.

Section 5.9 of the Smart Energy Code (SEC) requires DCC to process Service Requests sent to SMETS1 devices when they are on the Eligible Products Combination List (EPCL).

When a security vulnerability is discovered in a Device that is on the EPCL, it may be necessary to expedite the deployment of a firmware upgrade to that device. For SMETS1, a device may currently only appear on the Central Products List (CPL) once it has been added to the EPCL and DCC is not required to process Service Requests for devices that are not on the CPL. A 'Fast Track Pending Product Combinations Tests' (fast track PPCT) process has been added to the Enduring Test Approach Document (ETAD) previously, to expedite Pending Product Combinations Tests (PPCT) where it is deemed necessary. However, in the case of a material security vulnerability or an in extremis scenario, Suppliers may develop a new firmware version and deploy this to the impacted devices without following the PPCT process. In such a circumstance, the new Device Model Combination (DMC) would not appear on the EPCL and DCC would not have an obligation to process Service Requests relating these devices.

It is therefore necessary to develop a process which will allow Suppliers to develop a new version of firmware to resolve the security vulnerability and create an obligation on DCC to process Service Requests in relation to these Devices. The process that is being proposed in this consultation is intended to provide a faster route to update the firmware prior to undertaking the fast-track PPCT process. However, the process is only intended to provide a temporary opportunity to include a DMC on the CPL while the DMC is progressed through the PPCT process and can therefore also be added to the EPCL and the CPL will reflect the entry on the EPCL.

DCC's proposal has been discussed with Department for Business, Energy and Industrial Strategy (BEIS) and the Security Sub-Committee (SSC) and DCC would appreciate the consideration by Parties of the process and welcomes any considered comments.

2. Proposed Changes to the SEC

The solution that DCC is proposing will require changes to SEC Appendix Z - CPL Requirements Document with consequential changes to Section A – Definitions and Interpretation and Section H – DCC Services.

In this Section, DCC proposes to set out the background of the changes and details of the process which is then followed by a summary of the proposed changes for each document.

DCC envisages a process that follows the process set out in Attachment 5 which DCC also summarises in this section.

Where a security vulnerability is identified by a Supplier, DCC anticipates that a Supplier can develop a new version of firmware to rectify the vulnerability and will test the firmware. DCC anticipates that the Supplier will seek to upgrade the firmware on all impacted devices as soon as possible and will therefore seek an emergency addition of a new Device to the CPL. Such addition will obligate DCC to process Service Requests in relation to the relevant devices, even though the device does not initially appear on an EPCL Entry.

Once the Supplier has developed this firmware, the Supplier will contact Smart Energy Code Administrator and Secretariat (SECAS) and raise an emergency addition to the CPL following the SECAS process that is set out on the SECAS website¹. DCC is of the view that following this process is at the discretion of the Suppliers and that they should only do this where they believe it is absolutely necessary from a Security perspective. In parallel to a Supplier raising the emergency addition onto the CPL, the Supplier should make DCC aware of the proposed addition to the CPL and allow DCC to track the addition of the new non-EPCL entry to the CPL. This will allow DCC to react quickly to the addition of the new CPL entry and limit the amount of time before any changes are reflected in the Smart Metering Inventory. DCC anticipates using MS Forms & Power Automate (subject to testing) as this will provide DCC with greater flexibility in the notification process and with the ability to quickly react to any such notification than the Self-Service Interface.

DCC will validate the information received from SECAS relating to the addition of emergency addition to the CPL and load the information onto the Smart Metering Inventory. The Supplier will be informed once the Smart Metering Inventory is loaded successfully which will indicate to the affected Supplier that it can commence its firmware upgrades and that it will be able to use DCC to communicate with the upgraded devices.

The Supplier will then be required to follow the process in the ETAD for the SMETS1 Pending Product Combinations Tests: Fast Track Process.

The proposed changes will provide an obligation on DCC to process Service Requests sent to devices that have been added to the CPL following this procedure, thereby ensuring that Service Requests to the affected devices will continue to be processed.

**CPL
Q1**

Do you agree with the proposed process that is outlined to enable an emergency addition onto the CPL? Please provide rationale for your reasoning.

2.1. Proposed Changes to Appendix Z

DCC is proposing changes to Clauses 3.2 and onwards of SEC Appendix Z – CPL Requirements Document as marked in the attached version of the Appendix. These contain the requirements for the process described above.

**CPL
Q2**

Do you have any comments on the proposed changes to SEC Appendix Z – CPL Requirements Document within the scope of this consultation?

2.2. Proposed Changes to the main body SEC

DCC is proposing two minor changes to the main body of the SEC which are required as a consequence of the proposed changes to the CPL Requirements Document.

¹ [Document Download Centre » \(smartenergycodecompany.co.uk\)](https://www.smartenergycodecompany.co.uk)

The first change is to the definition of Equivalent steps that clarifies that, in relation to the upgraded devices, DCC would need to take those steps that it would have taken prior to the firmware upgrade.

DCC is proposing an additional definition for a new term in Section A that will be introduced for devices that are added to the CPL using the proposed process – Non-EPCL Device Model.

DCC is further proposing consequential changes to Section H5.9 of the SEC which will oblige DCC to process Service Requests targeted at devices that have been added to the CPL using the proposed process.

**CPL
Q3**

Do you have any comments on the proposed consequential changes to the main body of the SEC within the scope of this consultation?

3. Next Steps

Following the closure of this consultation, DCC will consider respondents' views, and, subject to the consultation responses received, submit to the BEIS an amended version of Appendix Z – CPL Requirements Document and the proposed changes to the SEC that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC is aiming to provide the updated versions of these documents to BEIS no later than 9 July 2021. DCC has discussed the re-designation of the Appendix Z – CPL Requirements Document and the making of the consequential main body SEC changes with BEIS and it is proposed that, subject to timely receipt of DCC's report and copies of relevant stakeholder responses to this consultation, BEIS will re-designate the CPL Requirements Document on 20 July 2021 or as soon as reasonably practicable within one month thereafter and make the consequential changes to Sections A and H as part of this process.

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

**CPL
Q4**

Do you have any comments on the draft direction included in Attachment 1 or on the proposed date of 20 July 2021 for redesignation of the CPL Requirements Document and the making of the consequential changes to Sections A and H?

4. How to Respond

Please provide responses by 1600 on 22 June 2021 to DCC at consultations@smartdcc.co.uk.

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 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.

5. Attachments

- Attachment 1: Draft Direction
- Attachment 2: Section A – Definitions and Interpretation proposed changes
- Attachment 3: Section H – DCC Services proposed changes
- Attachment 4: SEC Appendix Z – CPL Requirements Document proposed changes
- Attachment 5: SMETS1 Emergency Firmware Deployment Process
- Attachment 6: Response template

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the Appendix Z – CPL Requirements Document and the main body of the SEC.

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 MM YYYY], the CPL Requirements Document previously designated and incorporated into the SEC as Appendix Z is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

Pursuant to Condition 22.30(a) of the DCC Licence and Paragraph X5.6 of the SEC, the Secretary of State directs that in consequence of the redesignation of the CPL Requirements Document, with effect from [DD MM YYYY], Section A (Definitions and Interpretation) of the SEC is amended to add a definition of Non-EPCL Device Model and to change the definition of Equivalent Steps as further set out in Annex [yy] to this direction and Paragraph H5.9 is amended as further set out in Annex [ZZ] to this direction.

For the avoidance of doubt such re-designation of the CPL Requirements 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.