



DCC Response to its Consultation on changes to enable Emergency CPL SMETS1 entries

**DCC response to its 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 SMETS1 Eligible Product Combinations 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 Model may currently only appear on the Central Products List (CPL) once that Device Model has been added to one of the entries on the EPCL and DCC is not required to process Service Requests for Devices Models 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.

DCC accordingly developed a process which will allow Suppliers to develop a new version of firmware to resolve a security vulnerability and create an obligation on DCC to process Service Requests in relation to these Devices. The process that was proposed in the consultation was intended to provide a faster route to update the firmware prior to undertaking the fast-track PPCT process.

2. Consultation Questions & Responses

2.1. Questions

The consultation presented the consultation questions as set out in Table 1.

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.
CPL Q2	Do you have any comments on the proposed changes to SEC Appendix Z – CPL Requirements Document within the scope of this consultation?
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?
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 re-designation of the CPL Requirements Document and the making of the consequential changes to Sections A and H?

Table 1

2.2. Responses

DCC received two written respondents to the consultation. DCC has furnished the Secretary of State with both responses that it received.

3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.

3.1. Question 1, 2 and 3

DCC sought views on its proposed process asking for comments on the process and the proposed regulatory changes.

DCC received two responses to these questions. Both respondents agreed with the proposed process.

A respondent sought clarification of a conflict between the process flow which referred to a Remedy ticket and the description in the consultation which referred to MS Forms & Power Automate.

The process that DCC anticipates using is the MS Forms & Power Automate following completion of testing as this will provide DCC with greater flexibility in the notification process and with the ability to react quicker than if the process was run through the Self Service Interface. If it becomes apparent that it would be beneficial to parties to operate the process through a different platform, the proposed regulatory provisions allow for the flexibility to make the process available through an alternative means.

There were no disagreements to the proposals or regulatory drafting.

3.2. Question 4

DCC sought views on proposals to re-designate the CPL Requirements Document asking: ***"Do you have any comments on the draft direction included in Attachment 1 or on the proposed date of 20 July 2021 for re-designation of the CPL Requirements Document and the making of the consequential changes to Sections A and H?"***

One respondent agreed to the proposed date and one respondent did not provide an answer to this question.

4. Conclusions

DCC is of the opinion that it has had input from Industry having engaged with the Security Sub-Committee and appropriate consultation with industry regarding the proposed process, changes to the CPL Requirements Document, and consequential changes to the SEC.

DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in any changes to the CPL Requirement Document of the consequential changes to the SEC.

It is DCC's view that it has met its SEC obligations.

DCC considers that:

- the revised CPL Requirements Document, and consequential changes to the SEC are defined to a sufficient level of detail for re-designation into the SEC;
- the revised CPL Requirements Document, and consequential changes to the SEC provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised CPL Requirements Document, and consequential changes to the SEC are materially complete, and the content is technically accurate.

In summary, DCC considers that the revised CPL Requirements Document, and consequential changes to the SEC are fit for purpose.

5. Next Steps

DCC will submit the updated version of CPL Requirements Document, and consequential changes to the SEC to the Secretary of State on 9 July 2021 and anticipates that the Secretary of State will re-designate the CPL Requirements Document, and consequential changes to the SEC into the SEC on the 20 July 2021.

6. Attachments

- Attachment 1: Section A – Definitions and Interpretation proposed changes
- Attachment 2: Section H – DCC Services proposed changes
- Attachment 3: SEC Appendix Z – CPL Requirements Document proposed changes