

# CP Assessment Report

## CP1450 'Security Requirements for CoP10 Metering Equipment'

**ELEXON**



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### Committee

Supplier Volume Allocation Group

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### Recommendation

Approve

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### Implementation Date

25 February 2016  
(February 2016 Release)



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### About This Document

This document is the Change Proposal (CP) Assessment Report for CP1450 which ELEXON will present to the Supplier Volume Allocation Group (SVG) at its meeting on 1 December 2015. The SVG will consider the proposed solution and the responses received to the CP Consultation before making a decision on whether to approve CP1450.

There are four parts to this document:

- This is the main document. It provides details of the solution, impacts, costs, and proposed implementation approach. It also summarises the SVG's initial views on the proposed changes and the views of respondents to the CP Consultation.
- Attachments A and B contain the proposed redlined changes to deliver the CP1450 solution.
- Attachment C contains the full responses received to the CP Consultation.

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# 1 Why Change?

## What is the SMETS?

The Department of Energy and Climate Change (DECC)'s Smart Metering Implementation Programme (SMIP) has defined requirements for Smart Metering arrangements, which impact existing electricity and gas codes. These requirements are known as the Smart Metering Equipment Technical Specification (SMETS).

In general, Meters that comply with version 2 of the SMETS (SMETS2) will also comply with the main requirements of [Code of Practice \(CoP\) 10 'Metering of Energy via Low Voltage Circuits for Settlement Purposes'](#).

## What is the issue?

SMETS2 Meters will not meet the exact 'Security Regime Requirements' in Section 5.6 of CoP10, which requires the use of three levels of password to control access. Instead, the Smart Key Infrastructure (SMKI) used for SMETS2 Meters will provide a higher level of security. Therefore, by exceeding the security requirements in CoP10, a SMETS2 Meter would be compliant with CoP10. CoP10 would benefit from an explicit statement to this effect.

Subject to meeting the additional CoP10 requirements set out in our ['BSC Codes of Practice and Smart Meters'](#) guidance note, SMETS Meters can be used for Half Hourly (HH) Settlement. We presented this guidance note to the SVG on 30 June 2015 for review ([SVG173/04](#)). The SVG agreed that, by exceeding the security requirements in CoP10, a SMETS2 Meter would be compliant with CoP10. The SVG asked us to raise a CP to include an explicit statement to this effect in CoP10.

### Proposed solution

[CP1450 'Security Requirements for CoP10 Metering Equipment'](#) was raised by ELEXON on 18 September 2015. It proposes to amend CoP10 Section 5.6 to state that Metering Equipment shall either:

- comply with the SMETS, and therefore the security requirements; or
- allow for at least the levels of access currently defined.

In addition, a cross-reference to the BSC definition of SMETS will be added to CoP10 Section 2 'References'.

### Proposer's rationale

We believe that the proposed change will remove a barrier to elective HH Settlement for domestic and small non-domestic Metering Systems. It will ensure that Meters that comply with the SMETS will also meet the CoP10 security requirements.

### Proposed redlining

Attachments A and B contain the proposed changes to CoP10 and [BSCP601 'Metering Protocol Approval and Compliance Testing'](#) to deliver CP1450.

### 3 Impacts and Costs

#### Central impacts and costs

CP1450 will require changes to CoP10 and BSCP601. No system changes are required and there will be no impact on BSC Agents.

The central implementation costs for CP1450 will be approximately £240 (one ELEXON man day) to implement the relevant document changes.

| Central Impacts   |                |
|---|----------------|
| Document Impacts  | System Impacts |
| <ul style="list-style-type: none"><li>CoP10</li><li>BSCP601</li></ul> | <i>None</i>    |

#### BSC Party & Party Agent impacts and costs

##### Participant impacts

CP1450 will impact Suppliers and HH Meter Operator Agents (MOAs). Three of the eight respondents to the CP Consultation indicated that they will be impacted by CP1450. One respondent noted that as a HH Data Collector (DC) they may have to carry out BSCP601 testing for smart Meters. Another respondent commented that although the exact scenarios have not yet been defined, they expect that as a MOA and DC, they will at some point be affected by SMETS2 security in CoP10 Meters.

The other respondent commented that they would be indirectly impacted as the consequential impact of the removal of the potential barrier could lead to system changes. This would be in order to process a Change of Supplier (CoS) where the Metering System is currently settled HH.

The remaining five respondents did not identify any impacts associated with CP1450.

| BSC Party & Party Agent Impacts |   |
|---------------------------------|---|
| BSC Party/Party Agent           | Impact  |
| Suppliers                       | Changes will be required to implement the solution. |
| HHMOAs                          |   |

##### Participant costs

Two of the eight respondents indicated that there will be costs associated with CP1450. One respondent noted that these costs will be as and when BSCP601 testing is carried out, however this will be absorbed into normal operational costs. The other respondent commented that there will potentially be costs involved as an indirect result of gaining an elective HH Metering System from another Supplier, that they elect not to settle HH and have to carry out a Change of Measurement Class (CoMC). As detailed in section 6, CP1450 is not introducing elective HH Settlement as this can already be carried out today.

The remaining six respondents did not identify any costs associated with CP1450.

## 4 Implementation Approach

### Recommended Implementation Date

CP1450 is proposed for implementation on **25 February 2016** as part of the February 2016 BSC Systems Release.

The February 2016 Release is the next available Release that can include this CP.

Seven of the eight respondents to the CP Consultation agreed with the proposed Implementation Date. The one respondent who disagreed with the Implementation Date was the same respondent who disagreed with the overall proposal.

## 5 Initial Committee Views

### SVG's initial views

The SVG considered CP1450 at its meeting on 29 September 2015 ([SVG176/08](#)).

An SVG Member commented that they were supportive of the change, commenting that the change is a removal of one of the barriers to elective HH Settlement.

The SVG did not ask for any additional questions to be added to the CP Consultation.

## 6 Industry Views

This section summarises the responses received to the CP Consultation. You can find the full responses in Attachment C.

| Summary of CP1450 CP Consultation Responses                          |     |    |                           |       |
|--|-----|----|---------------------------|-------|
| Question   | Yes | No | Neutral/<br>No<br>Comment | Other |
| Do you agree with the CP1450 proposed solution?                      | 7   | 1  | 0                         | 0     |
| Do you agree that the draft redlining delivers the intent of CP1450? | 8   | 0  | 0                         | 0     |
| Will CP1450 impact your organisation?                                | 3   | 5  | 0                         | 0     |
| Will your organisation incur any costs in implementing CP1450?       | 2   | 6  | 0                         | 0     |
| Do you agree with the proposed implementation approach for CP1450?   | 7   | 1  | 0                         | 0     |
| Do you have any further comments on CP1450?                          | 1   | 7  | 0                         | 0     |

### Comments on the CP

Seven of the eight respondents to the CP Consultation agreed with the proposed changes for CP1450. Respondents commented that the solution provides clarity that Metering Systems that are SMETS compliant also meet the CoP10 security requirements. In addition, respondents are supportive of the removal of a barrier to the possible HH Settlement of smart Meters. One respondent also noted that the Settlement Reform Advisory Group (SRAG) is looking at the broader issue of how SMETS2 Meters could be utilised to record HH Settlement data and the end-to-end process (inclusive of the Data and Communications Company (DCC)), in order to understand the remaining barriers to elective HH Settlement for SMETS2 Meters.

### Barriers to elective HH Settlement

One respondent disagreed with the proposed changes for CP1450 commenting that whilst they recognised the SVG's view that the security requirements of SMETS are superior to that of CoP10 requirements, they did not believe that elective HH under the current arrangements are beneficial for domestic and SME Metering Systems. They noted that even though the barrier for elective HH Settlement would be removed, further barriers could arise that directly impact customers. For example, if another Supplier gained a Metering System in this instance and was not able to settle HH, additional costs would be incurred as a result of the CoMC required. These costs may ultimately be passed back to customers.

We agree that this is not the only barrier to elective HH Settlement. The SRAG is looking at other barriers, including what HH domestic and small non-domestic processes may look like. The CoMC process for a DCC-serviced smart Meter is likely to be very different to the CoMC process for advanced Meters and with different costs. We note that CP1450 is not introducing elective HH Settlement as this can already be carried out today.

## **SMETS2 Meters and passwords**

One respondent queried whether password details will be transferred via a D0268 'Half Hourly Meter Technical Details' data flow if SMETS2 Meters are to operate as HH. We can confirm that SMETS2 Meters do not need to have passwords. They will operate under the DCC security framework which is a Public Key Infrastructure (PKI) regime rather than the tiered-password regime specified in CoP10.

The same respondent also queried that if a D0268 data flow is used, what values, if any, will be populated for the Outstation Password Level 1 and 2. We note that the HH arrangements for DCC-serviced smart Meters have not yet been defined; however the SRAG has started looking into these. If the D0268 data flow continues to be used and passwords are not required, the fields will need to be left blank.

Furthermore, the respondent was concerned about interoperability. If a customer chooses a different agent, the respondent queried whether the new agent would be able to interface with the SMETS2 hardware. We advised that for DCC-serviced Meters, access to the SMETS2 Meter will be via the DCC. At DCC go-live it will be primarily Suppliers who access the metered data. We note that how this data is passed to agents (or whether agents need access to readings via the DCC) is yet to be defined and is being looked at by the SRAG.

## **Comments on the proposed redlining**

Respondents to the CP Consultation unanimously agreed that the proposed redlined changes to CoP10 and BSCP601 deliver the intention of CP1450.

## 7 Recommendations

We invite you to:

- **APPROVE** the proposed changes to CoP10 and BSCP601 for CP1450; and
- **APPROVE** CP1450 for implementation on 25 February 2016 as part of the February 2016 Release.

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## Appendix 1: Glossary & References

### Acronyms

Acronyms used in this document are listed in the table below.

| Acronyms |   |
|----------|---|
| Acronym  | Definition  |
| BSC      | Balancing and Settlement Code ( <i>Industry Code</i> )                      |
| BSCP     | Balancing and Settlement Code Procedure ( <i>Code Subsidiary Document</i> ) |
| CoMC     | Change of Measurement Class   |
| CoP      | Code of Practice ( <i>Code Subsidiary Document</i> )                        |
| CoS      | Change of Supply  |
| CP       | Change Proposal   |
| CPC      | Change Proposal Circular  |
| DC       | Data Collector ( <i>Party Agent</i> )                                       |
| DCC      | Data and Communications Company   |
| HH       | Half Hourly   |
| MOA      | Meter Operator Agent ( <i>Party Agent</i> )                                 |
| PKI      | Public Key Infrastructure   |
| SMETS    | Smart Metering Equipment Technical Specifications                           |
| SMKI     | Smart Metering Key Infrastructure   |
| SRAG     | Settlement Reform Advisory Group ( <i>Panel sub-Committee</i> )             |
| SVG      | Supplier Volume Allocation Group ( <i>Panel Committee</i> )                 |

### DTC data flows and data items

DTC data flows and data items referenced in this document are listed in the table below.

| DTC Data Flows and Data Items |                                     |
|-------------------------------|-------------------------------------|
| Number                        | Name                                |
| D0268                         | Half Hourly Meter Technical Details |

### External links

A summary of all hyperlinks used in this document are listed in the table below.

All external documents and URL links listed are correct as of the date of this document.

| External Links |  |   |
|----------------|--|---|
| Page(s)        | Description                                  | URL   |
| 2              | Codes of Practice page on the ELEXON website | <a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/">https://www.elexon.co.uk/bsc-related-documents/related-documents/codes-of-practice/</a> |

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| External Links |                                     |   |
|----------------|-------------------------------------|---|
| Page(s)        | Description                         | URL   |
| 2              | Metering page on the ELEXON website | <a href="https://www.elexon.co.uk/reference/technical-operations/metering/">https://www.elexon.co.uk/reference/technical-operations/metering/</a>             |
| 2              | SVG173 page on the ELEXON website   | <a href="https://www.elexon.co.uk/meeting/svg-173/">https://www.elexon.co.uk/meeting/svg-173/</a>   |
| 3              | CP1450 page on the ELEXON website   | <a href="https://www.elexon.co.uk/change-proposal/cp1450/">https://www.elexon.co.uk/change-proposal/cp1450/</a>   |
| 3              | BSCPs page on the ELEXON website    | <a href="https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/">https://www.elexon.co.uk/bsc-related-documents/related-documents/bscps/</a> |
| 5              | SVG176 page on the ELEXON website   | <a href="https://www.elexon.co.uk/meeting/svg-176/">https://www.elexon.co.uk/meeting/svg-176/</a>   |

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