

Modification proposal:	Smart Energy Code Modification Proposal (SECMP)0009 – Centralised Firmware Library		
Decision:	The Authority ¹ determines that this modification ² should be made ³		
Target audience:	Data and Communications Company (DCC), SEC Panel, Parties to the SEC and other interested parties		
Date of publication:	03 January 2019	Implementation date:	28 February 2019

Background to the modification proposal

Suppliers, in a Change of Supplier (CoS) scenario, can become responsible for maintaining assets supplied by manufacturers with which they do not have commercial agreements. However, they still have the responsibility of maintaining the asset, including ensuring the latest version of firmware is in use. At the moment, there is no easy way for Suppliers to determine whether the firmware is the latest version and any applicable contact information for the manufacturer if it is not.

There is currently no provision for a centralised access point for information regarding firmware that Suppliers can access.

The modification proposal

SECMP0009 'Centralised Firmware Library' was raised by RWE NPower on 1 March 2016, and proposes to establish a Firmware Information Repository (FIR) containing non-commercial data regarding firmware. It aims to allow a Supplier to easily identify the most recent firmware release for an asset, and which manufacturer to contact for updated versions. The information will be supplied by the meter manufacturers.

The FIR would sit alongside the Central Products List (CPL) and be updated concurrently, with access being limited to SEC Parties.

SEC Change Board⁴ recommendation

At the SEC Change Board meeting on 21 November 2018, a majority of the Change Board considered that SECMP0009 would better facilitate the General SEC Objectives and the Change Board unanimously voted for its approval.

A majority of the Change Board considered that the First General SEC Objective⁵ would be better facilitated by SECMP0009. In particular, they considered that the implementation of SECMP0009 would make it easier for gaining Suppliers to have access to firmware versions and increase interoperability.

¹ References to the "Authority", "Ofgem", "we" and "our" are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day to day work. This decision is made by or on behalf of GEMA.

² 'Change' and 'modification' are used interchangeably in this document.

³ This document is notice of the reasons for this decision as required by section 49A of the Electricity Act 1989 and by section 38A of the Gas Act 1986.

⁴ The SEC Panel and Change Board are established and constituted pursuant to and in accordance with DCC Licence 22.25(a).

⁵ The first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

A minority of the Change Board members believed the modification would also better facilitate the Third⁶, Fourth⁷ and Sixth⁸ General SEC Objectives. A minority of the Change Board considered that the Third General SEC Objective would be better facilitated by SECMP0009 as it would promote efficient operations. A minority also believed that the Fourth General SEC Objective would be better facilitated as it would facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems, as Suppliers would have better access to all firmware versions. Lastly, a minority of the Change Board considered that the Sixth General SEC Objective better facilitated as the solution would ensure the protection of data and the security of Data and Systems in the operation of the SEC as it would keep devices secure and protect Intellectual Property (IP) of manufacturers.

The Change Board believes that SECMP0009 is neutral against the remaining General SEC Objectives.

DCC Impact Assessment

There are no impacts on the DCC Central Systems or Party interfacing systems.

Our decision

We have considered the issues raised by the modification proposal and the Final Modification Report (FMR) dated 23 November 2018. We have considered and taken into account the votes of the SEC Change Board on SECMP0009 which is attached to the FMR, and we have concluded that:

- the implementation of the modification proposal will better facilitate the achievement of the First General SEC Objective⁹; and
- directing that the change is approved is consistent with the Authority's principal objective and statutory duties.¹⁰

Reasons for our decision

We consider this modification proposal will better facilitate the First General SEC Objective and have a neutral impact on all the other SEC Objectives.

The First General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

We agree with the Working Group and the Change Board that SECMP0009 will better facilitate this Objective. SECMP0009 will ensure that gaining suppliers can seek access to firmware versions allowing upgrades to the churned devices. This information will also provide greater visibility of meter manufacturers to new entrants. Whilst it does appear much of the same information can be obtained in alternative ways, we agree with the

⁶ The third General SEC Objective is to facilitate Energy Consumers' management of their use of Energy through the provision to them of appropriate information by means of Smart Metering Systems

⁷ The fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy under the Principal Energy Legislation

⁸ The sixth General SEC Objective is to ensure the protection of data and the security of data and systems in the operation of the SEC

⁹ The Objectives in accordance with DCC Licence 22.10-22.17

¹⁰ The Authority's statutory duties are wider than matters that the Panel must take into consideration and are detailed mainly in the Electricity Act 1989 as amended and the Gas Act 1986 as amended.

Working Group that the introduction of the FIR will provide a useful tool for industry, thereby better facilitating the First General SEC Objective.

We also examined the costs associated with SECMP0009 as identified within the FMR. The administrative costs of creating, populating and publishing the spreadsheet onto the SECAS website are estimated to be £3,000. The future costs of maintaining the spreadsheet are expected to be minor. We therefore accept the Change Board's view that the benefits outweigh the costs for this modification.

Decision notice

In accordance with standard licence condition 23 of the Smart Meter Communication licence, the Authority hereby determines that the SECMP0009 'Centralised Firmware Library' should be made.

Jacqui Russell

Head of Metering & Market Operations

Signed on behalf of the Authority and authorised for that purpose