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SEC Change Sub-Committee Meeting 48_2102

21 February 2023, 10:00 – 12:10

Teleconference

SECCSC_48_2102 – Final Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	David Kemp (DK)
Large Suppliers	Emma Johnson (EJ)
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
Electricity Network Parties	Kelly Kinsman (KK)
Other SEC Parties	Alastair Cobb (AC)
	Beth Davey (BD)

Representing	Attendee
DCC	Tom Rothery (TR)
	Kevin Gale (KG) <i>(part meeting)</i>
	David Walsh (DW)
	David Rollason (DR)
	Leigh Hill (LH) <i>(part meeting)</i>
	Luis Ogando (LO)
	Joe Hehir (JH) <i>(part meeting)</i>
Ofgem	Jamie Flaherty (JF)
	Scott McPhillimy (SMcP)
SECAS	Rachel Black (RB) <i>(Meeting Secretary)</i>
	Bradley Baker (BB)
	Mike Fenn (MF) <i>(part meeting)</i>
	Mohammedanwar Sumro (MS)

Managed by

Representing	Attendee
	Kev Duddy (KD)
	Liz Woods (EW)
Citizens Advice	Caroline Farquhar (CF)
	Colin Griffiths (CG) <i>(part meeting)</i>
Ecotricity	Olga Goc (OG) <i>(part meeting)</i>
N3rgy	Matt Roderick (MR) <i>(part meeting)</i>

Apologies:

No apologies were received.

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the Change Sub-Committee (CSC) meeting.

One comment was raised on the last meeting minutes. The CSC were shown the comments. Once updated, the CSC **APPROVED** the minutes as written.

2. Actions Outstanding

Action Reference	Action
40/01	SECAS and the DCC to work on producing guidance for the Gas Network Operators (GNOs) regarding the planned changes under MP128A. The DCC (DW) advised that they would have the updates for SECAS by the end of the month. Status: OPEN
46/03	SECAS to review the RAG status used in the SEC Release Updates with AC and inform the CSC of any changes arising from this. SECAS advised that they are investigating this further with AC, and expect to have updates to the paper ready for next month's meeting. Status: OPEN
47/01	The DCC to confirm whether there is any WAN reporting being carried out at present. The DCC (TR) advised that there is currently no Wide Area Network (WAN) reporting being carried out. They added that the last time WAN had been reported on in a formal capacity by the DCC was in the DCC 2021 Statement of Service Exemptions. Status: CLOSED

Action Reference	Action
47/02	The DCC to provide SECAS with the DCC 2022 Statement of Service Exemptions
It was agreed that this action will remain open until the DCC 2022 Statement of Service Exemptions is published. Status: OPEN	
47/03	SECAS to revise the SEC Modification Timetables paper in response to the feedback provided by CSC members
The CSC had no comments on the updated SEC Modification Timetables paper. The Chair agreed to close this action. Status: CLOSED	

3. SEC Modification Progression

MP215 'Communications Hub Ordering and Forecasting'

SECAS (MF) presented the CSC with a summary of [MP215 'Communications Hub Ordering and Forecasting'](#), recommending it be progressed to the Report Phase.

A CSC member (BD) asked if the Communications Service Providers (CSPs) agreed with this modification. SECAS (MF) advised that they do, as this will increase the certainty they have for order quantities, and will also lead to less variance on the run up to delivery dates. SECAS noted that the CSPs have representatives on the Supply Chain Working Group, who have been involved in discussions on this modification. The DCC (LH) added that the CSPs have sought further forecasts of up to 18 months. However, it is believed that forecasts of up to 12 months is more reasonable, and will allow enough time to secure Device components.

The DCC (DR) advised that the temporary rules were looked at in an Operations Group (OPSG) meeting recently. The OPSG had suggested that the tolerance should be monitored, and increased in the future if needed. The DCC (DR) advised that this modification needed to be implemented by the end of March, believing the 20% tolerance felt right but was open to monitoring and reviewing this in the future. It had been highlighted that the tolerance level should be considered by the CSC. SECAS (MF) added that the OPSG had also wanted to see endorsement from the Supply Chain Working Group, as it is directly involved in the process, which was subsequently received. A CSC member (EL) agreed with the points made, and noted that there was concern amongst the Large Suppliers about the tolerance level but that if it is constantly evaluated that would mitigate those concerns. Another member (EJ) concurred.

The CSC:

- **AGREED** that MP215 should be progressed to the Report Phase
- **APPROVED** the updated Modification Report
- **APPROVED** the updated implementation approach
- **AGREED** that MP215 should be progressed as a Self-Governance Modification

DP227 'Pre-SMETS2 v4.2 Device IVP Extension'

SECAS (MF) presented the CSC with a summary of new Draft Proposal [DP227 'Pre-SMETS2 v4.2 Device IVP Extension'](#), recommending it be progressed to the Report Phase.

A CSC member (BD) asked if there were any updated figures from the DCC on the number of Devices affected. SECAS (MF) advised that they have not received an update yet, but will continue to engage with the DCC in relation to this. The member (BD) noted that they are trying to get reporting on this, as this would assist them in understanding the volume of impacted Devices.

Another member (AC) noted that requests to extend validity dates are received periodically for both Devices and Communications Hubs. Going forward, the member requested that these be looked at together to improve alignment. The Chair agreed with this, and suggested combining modifications where possible in order to look at the bigger picture.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP227 should be converted to a Modification Proposal
- **AGREED** that MP227 should be progressed to the Report Phase
- **APPROVED** the updated Modification Report
- **APPROVED** the updated implementation approach
- **AGREED** that MP227 should be progressed as a Self-Governance Modification

DP231 'Firmware upgrade pathways'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP231 'Firmware upgrade pathways'](#), recommending it be progressed to the Refinement Process.

A CSC member (AC) noted that the Security Sub-Committee CPA Issue Resolution Sub-Group (SCIRS) discussed adding extra items to the Central Products List (CPL). They noted that SECAS had taken an action to circulate proposed guidance of how this could be done in the short-term, which had been discussed at the Technical Architecture and Business Architecture Sub-Committee (TABASC) last year. SECAS (KD) confirmed that SECAS has an action from the SCIRS in relation to this, and will confirm progress on this after the meeting.

A CSC member (EJ) asked if this issue affected one Device type or whether it was a broader issue. SECAS (KD) confirmed multiple Device types were affected.

A CSC member (DD) asked if there was any SECAS guidance documentation on this. SECAS (KD) confirmed that the documentation was presented to the TABASC and will be presented to the Technical Specification Issue Resolution Subgroup (TSIRS) before being published. The member (DD) advised they had not seen the documentation yet, and SECAS (KD) advised they would follow up on this after the meeting.

A CSC member (AC) noted that it was unclear what the solution is going to be. SECAS (KD) advised there is a preferred solution that had previously been presented to the TABASC, but that this would be developed through the modification process. The Chair advised that the solution does not need to

be concrete at this stage. Once the issue had been confirmed, the work then begins on developing and assessing the solution against the defined problem statement.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP231 should be converted to a Modification Proposal
- **AGREED** that MP231 should be progressed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP231

Post meeting note: SECAS spoke with AC offline, and noted that TABASC members had concerns with the solution. These will be addressed during the Working Group and Refinement Consultation process.

DP228 'Other User Demand Forecasting'

SECAS (BB) presented the CSC with a summary of new Draft Proposal [DP228 'Other User Demand Forecasting'](#), recommending it remain in the Development Stage.

A CSC member (EJ) asked for clarification that this Draft Proposal was looking at the need to provide forecasting specifically, and was not related to making User Commands less disruptive or any encouragement to reduce usage or make more use of scheduling. SECAS (BB) confirmed this. The member noted their support for this being raised, and felt this change would be a sensible first step.

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP229 'Notification of material change to User Systems to include decommissioning'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP229 'Notification of material change to User Systems to include decommissioning'](#), recommending it remain in the Development Stage.

The CSC had no comments.

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP230 'Review the SLA for delivery and completion for SMETS1 firmware'

SECAS (MS) presented the CSC with a summary of new Draft Proposal [DP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#), recommending it remain in the Development Stage.

A CSC member (EL) considered that the impact this issue is currently having is that the DCC is unable to allow Users to roll out firmware in the volumes Users would like to be able to. They considered the DCC was stopping firmware from being rolled out as its systems couldn't handle the volume and size of the updates. The CSC asked for this to be clarified in the Modification Report.

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP232 'ACB Certs on I&C'

SECAS (MS) presented the CSC with a summary of new Draft Proposal [DP232 'ACB Certs on I&C'](#), recommending it remain in the Development Stage.

The DCC (DW) advised that this is not a problem currently, but new ACB certificates will be introduced later this year. They advised that the timeline was created in such a way to give the manufacturers time to introduce these new ACB certificates and then work their way through the supply chain. Therefore, when the time comes for them to be installed, there will be no delays. The DCC is seeking for this modification to be implemented in either the June or November 2024 SEC Release. The DCC has some potential solutions, which they will present to the Working Group soon.

A CSC member (EL) asked why the incorrect ACBs are there in the first place. The DCC (DW) advised that they are not incorrect. However, when the new ACB certificates are issued, the first ACB on the list may not be the latest one, meaning the Data Service Provider (DSP) will have to search for the latest one during an Install and Commission event. A CSC member (AC) noted that this migration period where old and new Devices will be mixed may become an issue.

A CSC member (DD) agreed that there is nothing wrong with what the Suppliers are doing, and rewording is needed to explain the issue more clearly. The member advised that this was discussed in the Design Release Forum (DRF), and it was observed that there is a small problem with some Communications Hubs being refurbished. The member stated that the DSP will try to use the last ACB certificate that was on the Communications Hub, which will lead to delays.

A CSC member (BD) asked if this issue has occurred before. Another member (EL) advised that this is the first time the ACB certificates are being updated since they were first put into use.

The CSC requested, and the Chair agreed, that the urgency of the Draft Proposal would be increased. The Chair also agreed this Draft Proposal will be returned to the CSC next month for progression to the Refinement Process once the issue has been clarified. SECAS will also work with the DCC to enable this modification to be discussed with the Working Group as soon as possible after that. A CSC member (DD) also advised that some DCC User Interface Specification (DUIS) and Great Britain Companion Specification (GBCS) changes would need to be discussed.

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP233 'Review of Appendix AG Incident categorisation'

SECAS (EW) presented the CSC with a summary of new Draft Proposal [DP233 'Review of Appendix AG Incident categorisation'](#), recommending it remain in the Development Stage.

A CSC member (EL) understood that the DCC has a 'simplification matrix', which they considered was causing this issue. They supported coming to a shared view on the categorisation of incidents to help speed up their resolution.

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'](#), recommending it remain in the Development Stage.

A CSC member (EL) noted that the Modification Report proposed only discussing the issue with the Security Sub-Committee (SSC). They recommended that the OPSG also input as it looks at collecting customer data. They also highlighted historic concerns over the collection of data by Other Users, and it was permitted at the time because of the security assessments undertaken by the Other User. However, there were concerns raised by consumer bodies as to how a customer would know who has permission to gather their data. The member also queried whether the process would ensure that the ultimate responsibility for the consumer does not fall back on the Supplier. They also believed that the solution for [DP218 'Review of the SEC Charging Methodology'](#) needed to be in place before this is modification reaches decision. The Chair noted that this Draft Proposal will be discussed with the other Sub-Committee Chairs after this meeting to ensure it goes before all the relevant Sub-Committees, and that SECAS would engage with the OPSG if the CSC considered its view would be needed. The Modification Report will be updated to reflect this.

A CSC member (BD) asked who this issue was raised by. SECAS (KD) advised that SECAS had been approached by an Other User who said they had been contacted by other parties.

Citizens Advice (CG) highlighted the need for transparency within smart metering, for consumers to be able to easily track where their data is going. They highlighted that consumers' main concerns with smart metering were around how their data was being used. The Chair agreed with this.

The Chair advised that this modification will be Authority Determined, and that SECAS will ensure that all these points are taken into consideration. Citizens Advice (CG) suggested that the modification also be discussed with the Information Commissioner's Office (ICO).

The CSC:

- **AGREED** that further development is required to define and understand the issue

DP235 'Enhanced Meter Data Access for Other Users'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP235 'Enhanced Meter Data Access for Other Users'](#), recommending it remain in the Development Stage.

A CSC member (EL) noted there were reasons why these Service Requests hadn't been extended to Other Users originally and believed that this proposal will need to be looked at in tandem with DP234. They also questioned how the collection of data will be managed, and whose responsibility it would be to investigate any errors or issues. The Proposer (MR) agreed that this would need to be properly managed, noting the issue already exists today.

Citizens Advice (CG) noted support for new products and offerings, but asked how consent to collect this data will be managed, noting the DCC doesn't validate this, and raised concerns around incorrect data being given out. The Proposer (MR) advised that the system within the SEC works through the privacy audit mechanisms, and they would be happy to work to rectify this if this is insufficient. The Proposer (MR) added that the model that exists today is that Users undergo Privacy Assessments.

A member (BD) highlighted DP228 above, and noted that if Other Users can send more Service Requests then that would impact on forecasting and scheduling demand too.

Citizens Advice (CG) advised that consumers are worried about losing control of their data. The Proposer (MR) acknowledged this, and advised that they build their data dashboard with all the appropriate mechanisms so consumers can see who has access to their data. The Proposer acknowledged Citizens Advice's concerns, but suggested that it is a general challenge on how the system works rather than this specific modification. They noted that this modification should be considered within the current framework and not tied to a wider industry problem. The Chair highlighted that any solution would need to account for all potential angles and would need to provide sufficient assurance to the Authority on consumer protection. Citizens Advice (CG) also considered that any solution should not make any wider issues worse or harder to resolve.

Citizens Advice (CG) and the Proposer (MR) also believed that the Department for Energy Security and Net Zero (DESNZ) will need to be engaged during the development of this Draft Proposal.

The CSC:

- **AGREED** that further development is required to define and understand the issue

4. SEC Modification Timetables

SECAS (KD) provided an update on the timetables for Modification Proposals, providing updated work packages for modifications that have reached the end of their previously agreed packages of work.

A CSC member (AC) queried whether the timetables across all modifications allowed for the increased urgency requested for DP232 to facilitate it being included in the November 2024 SEC Release. The Chair highlighted that the timetable for DP232 will have to be taken away and considered after today's comments. SECAS will update the CSC next month if the timelines for any other modifications also need to be revised to allow for this. The DCC (DW) advised that they have a short-term fix that can be used in the interim but would like DP232 to be included in a 2024 SEC Systems Release. They acknowledged the need for a Preliminary Assessment and an Impact Assessment would make this timeline challenging.

The CSC:

- **APPROVED** the packages of work and the progression timetables outlined in the paper

5. SEC Releases Update

SECAS (MF) presented an update on progress with the upcoming SEC Releases.

The CSC had no comments.

The CSC:

- **APPROVED** the changes to the scope of the June 2023 SEC Release
- **NOTED** the updates on the SEC Releases provided in the paper

6. Approval to implement the February 2023 SEC Release

SECAS (MF) requested the CSC approve the February 2023 SEC Release is ready to go live on Thursday 23 February 2023.

The CSC had no comments.

The CSC:

- **AGREED** that the February 2023 SEC Release can be set live on 23 February 2023.

7. Any other business (AOB)

SECAS (RB) advised the CSC that the CSC elections are now underway for 2023, with nominations being sought for five seats for the term starting on 1 April 2023.

There was no further business, and the Chair closed the meeting.

Next Meeting: 21 March 2023