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# SEC Change Sub-Committee Meeting 51_1605

## 16 May 2023, 10:00 – 12:25

## Teleconference

# SECCSC_51_1605 – Final Minutes

## Attendees:

| Representing | CSC Member |
|---|---|
| Change Sub-Committee Chair | Ali Beard (AB) |
| Large Suppliers | Emma Johnson (EJ) |
| Small Suppliers | Daniel Davies (DD) |
| Electricity Network Parties | Kelly Kinsman (KK) |
| Other SEC Parties | Jeff Studholme (JS) |
| | Alastair Cobb (AC) |

| Representing | Attendee |
|---|---|
| Citizens Advice | Caroline Farquhar (CF) *(part meeting)* |
| DCC | David Walsh (DW) *(part meeting)* |
| | Tom Rothery (TR) |
| | Robin Seaby (RS) |
| Ofgem | Jamie Flaherty (JF) |
| Gemserv | Zoe Allamenou (ZA) *(part meeting)* |
| SECAS | Rachel Black (RB) *(Meeting Secretary)* |
| | Bradley Baker (BB) |
| | Liz Woods (EW) |
| | Kev Duddy (KD) |
| | Mohammedanwar Sumro (MS) |
| | Ben Giblin (BG) |
| | Zoe Allamenou (ZA) *(part meeting)* |

## Apologies:

| Representing | CSC Member |
|---|---|
| Large Suppliers | Emslie Law |

## 1. Welcome and Introductions & Approval of Previous Meeting Minutes

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

The CSC noted that no comments had been raised on the last meeting minutes. The CSC **APPROVED** the minutes as final.

## 2. Actions Outstanding

| Action Reference | Action |
|---|---|
| **47/02** | The DCC to provide SECAS with the DCC 2022 Statement of Service Exemptions (SoSE). |
| The DCC (TR) confirmed that the DCC 2022 SoSE was now on the DCC website. The Chair advised that this action could be closed.<br>Status: CLOSED | |
| **50/01** | SECAS to confirm how decommissioning is notified to the SSC and subsequently managed during disorderly exits. |
| SECAS (KD) advised that disorderly exits are an accepted risk by the Security Sub-Committee (SSC). The Chair advised that this action could be closed.<br>Status: CLOSED | |

## 3. SEC Modification Progression

**MP178 'Removing DSP validation against the SMI join status for SR8.8.x'**

SECAS (EW) presented the CSC with a summary of MP178 'Removing DSP validation against the SMI join status for SR8.8.x', recommending it be progressed to the Report Phase.

A CSC member (AC) observed that the impact of not progressing this modification is unclear and noted that this error would need to occur in large volumes to justify the cost of this modification. The CSC member asked for more detail. SECAS (EW) advised that there are instances where the Device is joined, but this is not reflected on the Smart Metering Inventory (SMI). Therefore, the installer is unable to unjoin the Device as the SMI is holding incorrect information. SECAS noted that there was support for this modification when it was brought to the Working Group, and if the join validation against information held in the SMI is removed it will not automatically reject the Unjoin Service Reference Variants (SRV). This would reduce the time involved at point of installation and commissioning. The CSC member advised that they were still unsure about the cost justification and would like to hear from people who would be able to provide more insight into this.

A CSC member (JS) noted that there are five instances of this occurring that are know of, and suggested that there will be hidden costs involved in removing the Devices. The DCC (DW) advised that these five instances occurred up to the issuance of the Request for Information, and it is not just five cases in total. The Chair acknowledged this and advised that the installers try to unjoin, however when they are unsuccessful have opted to replace the Device or Communications Hub in order for the installation to be successful. The CSC member noted that they are aware of many smart meters being installed and replaced on the same day, which this change could help avoid. The Chair advised that it is likely that these instances are undiagnosed and are therefore unrecorded, and this modification would allow for this barrier to be removed. The Chair highlighted that the cost is small in comparison to other modifications, and noted that the likely reason SEC Parties do not perform manual corrections is that they take up to six months to complete and cost industry two thousand pounds per correction. SECAS (EW) added that this modification will improve the consumer experience by reduced time at point of installation and negate the need for return visits. The CSC member asked if evidence can be retrieved on the hidden costs. The Chair advised that SECAS were willing to attempt this, however it would mean the modification will be delayed by another year. Since the solution needs a twelve-month lead time as it involves a Data Communications Company User Interface Specifications (DUIS) change any delay at this point will mean it will miss the June 2024 SEC Release, and be pushed back to the June 2025 SEC Release.. The Chair advised that the figures would be difficult to find, and asked for CSC members' views on if it would be worth delaying the implementation of this modification. SECAS (EW) highlighted that a British Gas representative mentioned in a Working Group meeting that this would help with the issue of 'stranded' Devices as well.

A CSC member (DD) noted that this may be related to some Devices having 'phantom' logs on their systems which may cause issues in the future, but it is difficult to measure.

A CSC member (EJ) noted that it would be a good idea to send this modification to the Report Phase, as it will allow more people to submit their views

A CSC member (DD) noted that there has been six and a half thousand of the Response Code (E080801) received in the past three months for one Supplier. They noted that additional human intervention is needed to triage the issue, however, removing the Response Code (E080801) would mean that triage would no longer be needed.

A CSC member (AC) asked if this could be implemented as an ad-hoc Release. The Chair advised that this cannot be done for modifications requiring a DUIS change, as releases for modifications involving DUIS changes only occur once a year.

The CSC acknowledged that quantifiable data may not be possible to obtain but believed that it would be helpful to the Change Board to have any further information on the volume of Response Codes and for a question to be included in the Modification Report Consultation to see if any further data was available.

The CSC member also noted that it is given a low urgency and low value rating on the SEC Modifications Timetable and suggested that this should be amended.

The CSC:

- **AGREED** that MP178 should be progressed to the Report Phase
- **APPROVED** the Modification Report

- **APPROVED** the implementation approach
- **AGREED** that MP178 should be progressed as a Self-Governance Modification

**MP219 Accessing Consumption Data on behalf of SEC Parties'**

SECAS (BG) presented the CSC with a summary of MP219 'Accessing Consumption Data on behalf of SEC Parties' recommending it be progressed to the Report Phase. A CSC member (JS) raised concerns around this modification enabling the Proposer to sell services, querying why none of the Parties who must contact Energy Consumers to collect Unambiguous Consent have raised this modification, as they experience the issue identified in the modification.

The Chair advised that the Proposer is an Other User who offers services to Small Suppliers to collect Consumption Data on their behalf. In particular, the Proposer works with Small Suppliers who want the Consumption Data so they can pass it to other Parties, such as Flexibility Providers. The CSC member (JS) acknowledged this, but continued to question why the Small Suppliers affected had not raised this modification. The Chair advised that the Small Suppliers are often small organisations that may not have the time or resources to raise modifications and act as Proposers. As a result, this service is being offered to them by Other SEC Parties/Other Users.

Citizens Advice (CF) advised that they have spoken with SECAS and another Citizens Advice representative who is involved in data privacy for consumers. The Citizens Advice representative noted their belief that this modification is not in the consumers best interests, highlighting that existing privacy arrangements were developed with great detail and for a clear purpose. The member queried if there is an issue with collecting Unambiguous Consent from each Energy Consumer, adding that this is a process they have consented to in the past and found to be easy. The member also noted that they are concerned that Consumers could be contacted by an Other User who has collected their data without their knowledge. SECAS (BG) acknowledge the comment but clarified that the Proposed Solution did not allow the Other User to contact the Energy Consumer to offer services after they have collected the Consumption Data. The Other User is limited to collecting the Consumption Data and passing it back to the employing Party. SECAS highlighted that under changes which will amend the Privacy Controls Framework (PCF) alongside this modification, Other Users would only keep a record of the Consumers and Devices they have collected information from as they are required to do so when assessed by the Independent Privacy Auditor (IPA).

Citizens Advice expressed confusion around the Other Users collecting data and not using it. SECAS advised that they can already collect data with consent, with this modification proposing that the contracted Other User will not have to ask every individual consumer for consent. This allows Other Users to offer services to SEC Parties. A CSC member (AC) suggested that this is not only about efficiency, that it is also about saving costs in one particular commercial organisation. The CSC member raised concerns around Small Suppliers using a third party to collect data.

A CSC member (EJ) advised that they initially had concerns about this modification but noted that the legal text has been drafted in such a way the Other User is constrained in their activities and must adhere to the instructions of the employing Party. In turn, the employing Party must also adhere to the rights and conditions of their Energy Licence. The member also added that a benefit of this modification was highlighted earlier in the modification process, namely to assist Suppliers to pass data to the Demand-Flexibility Service (DFS).

The Gemserv Data Protection Consultant (ZA) advised that the Other User will need to update documents to include the provisions in the legal text and would also need to involve Consumers when updating the privacy notice. Gemserv advised that they expect to see this communicated in a digestible manner to advise Consumers on what these changes will mean for collection of their Consumption Data. Gemserv stated that this will be included as part of the IPA's assessment criteria, alongside checks that the contracts between the Parties have been adhered to

A CSC member (JS) acknowledged the Proposer's right to have their modification go through the modification process but expressed concern around Other SEC Parties raising modifications for their benefit and not paying for them. The CSC member noted that raising a modification is not a difficult task and could have been raised by a Small Supplier if they saw there was a need for this service. The CSC member stated that more evidence was required from the Proposer to prove that the existing arrangements are impacting the industry and that this change had a suitable industry business case.

A CSC member (AC) noted that a supplementary document for the meeting stated that MP219 would be included in the November 2023 SEC Release, yet the presentation requested the CSC to approve the modification as an ad-hoc SEC Release. The Chair acknowledged this disparity, noting that since the papers for the meeting were distributed, the Proposer requested this modification be implemented as an ad-hoc release. The Chair added it is within the remit of the CSC to determine when the modification should be implemented but noted that as this is a text-only change to the SEC there are no costs associated with implementation. The CSC believed there was no justification provided that this should be an ad-hoc implementation and the Proposer should provide a good rationale for it to be moved to an ad-hoc Release.

The CSC:

> **AGREED** that MP219 should stay in the Refinement Stage to gather further information to support the business case

**Action 51/01:** SECAS to work with the Proposer to demonstrate the need for change and provide a rationale for the ad-hoc implementation of MP219

**DP224 'SEC Performance Assurance Framework'**

SECAS (KD) presented the CSC with a summary of [DP224 'SEC Performance Assurance Framework'](), recommending it be progressed to the Refinement Process.

No comments were received from the CSC.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP224 should be converted to a Modification Proposal
- **AGREED** that MP224 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP224

**DP238 'TSAT Expired Communication Hubs'**

SECAS (MS) presented the CSC with a summary of DP238 'TSAT Expired Communication Hubs', recommending it be progressed to the Refinement Process.

A CSC member (JS) advised that they have seen this issue with smart meters being installed immediately, while others sit in warehouses indefinitely. The CSC member queried if a change to the SEC is required in this situation, or if it is a case of poor stock management. Another CSC member (AC) was concerned that this is an example of a 'modification' that will be discussed in various forums and have industry costs for time and effort associated with it, only to be rejected at Change Board. The CSC member noted that this modification will need to be monitored closely.

A CSC member (AC) asked if this modification will be presented to the Operations Group (OPSG). SECAS (MS) advised that it will be discussed as an item during the next OPSG meeting. The CSC member suggested that the modification appears to be a DCC issue, and raised concerns around the Technical Specification Applicability Tables (TSATs) being extended. The Chair advised that work is being undertaken to see how much it costs to extend the TSATs. The Chair highlighted that the more versions there are, the more costs there will be associated with releases.

A CSC member (AC) advised that concerns were raised at Panel recently about changes that need to be moved through the modification process. The CSC member raised concerns around the wider prioritisation of modifications, and suggested that this modification be brought back next month to be considered to be moved forward by the CSC.

The Chair acknowledged these concerns, and advised that SECAS has a Service Level Agreement (SLA) to move Draft Proposals forward in a timely manner once someone raises the issue. However, the Chair agreed that this modification should go to OPSG and can then be brought back to the CSC.

The CSC:

- **AGREED** that DP238 should remain in the Development Stage to further define and understand the issue

**DP241 'Interoperability Checker Update'**

SECAS (MS) presented the CSC with a summary of DP241 'Interoperability Checker Update', recommending it progress to the Refinement Process.

The Proposer (RS) advised that the Interoperability Checker can lead some consumers to believe that their smart meter is operating in smart mode, but they are not, which can lead to inaccurate feedback. A CSC member (JS) queried how explicit SEC Section H 16 is, and suggested that there is probably a gap between consumer expectation and what the DCC can show. The CSC member asked if we are at a point in the programme where we should advise consumers to speak to their Supplier to ensure their smart meter is updated to the latest version. The Proposer advised that if it is a Smart Metering Equipment Technical Specifications 1 (SMETS1) meter, the DCC will be able to see transactional data and give more definitive results. The Proposer stated that they also want consumers to have details of commissioning rates in their areas.

A CSC member asked if the SMETS1 meter is enrolled but not adopted, what would the Interoperability Checker look like. The Proposer advised that once it is enrolled, the capability for it to communicate is there and the Interoperability Checker would reflect this. The CSC member stated that the Interoperability Checker will state that it should be working, but the Supplier will not have adopted the meter. The CSC member raised concerns around the misalignment between consumer expectations gained from the Interoperability Checker (that the meter is smart) and what appears on their bill (if the Supplier is not using the meter in smart mode). The CSC member stated that the proposed changes will not solve that issue. The Proposer advised that they cannot indicate what the reason might be for the enrolment issue, and they can see where those meters are receiving traffic. The Proposer advised that the generalised results they currently give rely on data of individual Suppliers being kept up to date. The Proposer stated that the DCC and the Suppliers involved will need to maintain the mapping of SMETS1 meters to Suppliers, and the DCC can then take the data from the Service Audit Trail. The Proposer advised that they can also get information on which Suppliers can operate which meter model. The Chair acknowledged this, and advised that more work can be done on this during the Refinement Process.

A CSC member (JS) advised that it states on the Citizens Advice website that consumers can check their smart meter is working in smart mode. The CSC member suggested that the wording on the Citizens Advice website might be part of the issue, and Citizens Advice will need to consider how they present this information to consumers. The Chair advised they will discuss this with Citizens Advice.

A CSC member (EJ) asked why this modification is going to the Security Sub-Committee (SSC). SECAS (MS) advised that there might be security impacts on this modification, which will need to be considered by the SSC.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP241 should be converted to a Modification Proposal
- **AGREED** that MP241 should be progressed to the Refinement Process
- **AGREED** the first package of work and the timetable for MP241

## 4. SEC Releases Update

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

A CSC member (AC) queried why MP219 is included in the slide for the November 2023 SEC Release. The Chair advised that modifications need to be targeted for a Release when it becomes clear which Release is appropriate should the modification be approved. The Chair further clarified that it was put in the November 2023 SEC Release as it will miss the June 2023 SEC Release. The CSC member questioned leaving MP219 there after the discussion that was had around it during this meeting. The Chair advised that it would be beneficial to target this Release and remove it if necessary at a later date, rather than remove it now and try and target it for that Release again if it was to be approved. The Chair added that SECAS target modifications for Release before they are sent out for Refinement Consultation, and then include them in the Release Implementation Document (RID) and assume they will stay there until further notice. Then, if a modification is rejected, it can be removed. The CSC member acknowledged this, but expressed concern around going to Panel with this, as it appears that the CSC want to this to be implemented in the November 2023 SEC Release, as it does not reflect the discussion in this meeting. The Chair noted this, but advised that it is viewed as what is expected to be included in the Release if it is approved.

A CSC member (JS) asked why MP230 'Review the SLA for delivery and completion for SMETS1 firmware' has a cut-off date for inclusion in the November 2023 SEC Release of 19 October 2023, while MP226 'Incorporation of Category 3 Issue Resolution Proposals into the SEC - Batch 10' has a cut-off date of 24 May 2023. The CSC member observed that neither of the modifications are DCC systems impacting. The Chair advised that MP226 is an Issue Resolution Proposals (IRP) modification, which requires a longer lead time. The CSC member acknowledged this, and suggested that MP211 'Aligning the SMI with the CPL' could be moved from amber to red. The Chair noted this.

The CSC:

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

## 5. SEC Modification Timetables

SECAS (AB) 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) asked if what was on the Prioritisation Matrix slide was the same as what was in the SEC Modification Timetables paper that was sent out before the meeting. The Chair advised that some changes may occur between when the meeting papers are sent out and when the meeting takes place. The Chair proposed that for the next meeting SECAS can provide a list of changes that have taken place since the meeting papers were sent out. The Chair also highlighted that MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs' had changed to high priority as the Impact Assessment was returned recently, and it would be beneficial to include it in the same release as MP162 'SEC changes required to deliver MHHS' to reduce the costs. The CSC member suggested that this be made clearer going forward.

A CSC member (JS) asked how SECAS quantify the value on the prioritisation matrix. The Chair advised that it depends on what stage the modification is at, as at the beginning it is less clear what the value is going to be. However, this is reassessed as the modification develops. The Chair advised that prioritisation can be moved higher or lower. SECAS (BG) advised that MP202 is a good example of this. The Chair added that the costs associated with MP202 appear to be high, but if it is implemented with MP162 all the testing costs will be significantly reduced.

The DCC (TR) queried if DP218 'Review of the SEC Charging Methodology' had always had a high priority level, SECAS (BG) confirmed that it has.

A CSC member (AC) queried the prioritisation level of DP232 'ACB Certificates on Install & Commissioning'. The CSC member advised that DP232 was discussed at a SSC CPA Issue Resolution Sub-Group (SCIRS) meeting recently, and it was proposed that changes could be made to ECoS and ACB certificates. The CSC member stated that they had challenged whether they should be synchronised, but it was later stated that this will not need to happen until 2026. The Chair advised that they cannot move this until they discuss it with the Proposer. The Chair stated that OPSG believed that DP232 should not be a modification but under the control of OPSG and the priority may need to be increased. However, this can be reviewed when the Proposer returns from annual leave.

A CSC member (EJ) queried if MP241 'Interoperability Checker Update' should be given a higher priority based on how it affects consumers. The Chair noted this, and advised that most prioritisations are based on security and urgency issues, but they will take the consumer score into consideration. A CSC member (DD) advised that this might have a high consumer impact.

While discussing the amended work packages, a CSC member (EJ) asked what the criteria is for a modification to be included in this section. The Chair advised that this has nothing to do with priority and is based on timing and keeping track of how certain modifications are progressing. A CSC member (AC) asked if this includes modifications the CSC have previously agreed work packages for, and this work has now been completed and is ready to move to the next phase. The Chair agreed and explained that it holds the DCC and SECAS to account to ensure things are completed in a timely manner. A CSC member (JS) suggested that other topical modifications should be included here for more regular updates. The Chair advised that they will take this into consideration for future meetings.

The CSC:

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

## 6. Any other business (AOB)

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

**Next Meeting: 20 June 2023**