

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public and any Members may publish the information, subject to copyright.

SEC Change Sub-Committee Meeting 52_2006

20 June 2023, 10:00 – 12:15

Teleconference

SECCSC_52_2006 – Draft Minutes

Attendees:

Representing	CSC Member
Change Sub-Committee Chair	Ali Beard (AB)
Large Suppliers	Emma Johnson (EJ)
	Emslie Law (EL)
Small Suppliers	Daniel Davies (DD)
Other SEC Parties	Jeff Studholme (JS)

Representing	Attendee
N3rgy	Matt Roderick (<i>part meeting</i>)
DCC	David Walsh (DW)
	Tom Rothery (TR)
	David Rollason (DR)
Ofgem	Jamie Flaherty (JF)
	Scott McPhillimy (SMcP)
Gemserv	Zoe Allamenou (ZA)
SECAS	Rachel Black (RB) (<i>Meeting Secretary</i>)
	Bradley Baker (BB)
	Liz Woods (EW)
	Kev Duddy (KD)
	Ben Giblin (BG)

Apologies:

Representing	CSC Member
Other SEC Parties	Alastair Cobb

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
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.
Based on the MP219 'Accessing Consumption Data on behalf of SEC Parties' discussion in this meeting, the CSC agreed to leave this action open. Status: OPEN	

3. SEC Modification Progression

MP168 'CPL Security Improvements'

SECAS (KD) presented the CSC with a summary of [MP168 'CPL Security Improvements'](#), recommending it be progressed to the Report Phase.

No comments were received from the CSC.

The CSC:

- **AGREED** that MP168 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP168 should be progressed as a Self-Governance Modification

MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs'

SECAS (BG) presented the CSC with a summary of [MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs'](#), recommending it be progressed to the Report Phase.

A CSC member (JS) stated that they did not envision Parties would be willing to pay over £500,000 for this modification when no issues have been discovered with the current DCC tactical interim solution. Another CSC member (DD) agreed with this, and advised it was too costly for the issue it is trying to solve. The CSC member advised that implementation of this modification could create problems as they need to know if a Device is a Smart Metering Equipment Technical Specifications (SMETS) 1 Prepayment Meter Interface Device (PPMID) or a SMETS2 PPMID. The Chair advised that as part of the solution, the Data Service Provider (DSP) will use the relevant SMETS version from the Communications Hub to determine which version of SMETS the PPMID is. The CSC member noted this, but raised concerns around the Supplier needing to interpret this as there was no specific notification to the Supplier if the SMETS version is changed from the pre-notified version. The CSC member also highlighted that there might be hidden system changes resulting from this that they have not taken into consideration.

A CSC member (EL) stated that they understand the reason for this modification but raised concerns around the high cost involved to solve one data item. Another CSC member (DD) added that this would result in the SMETS1 PPMID over-the-air (OTA) being inoperable. However, the CSC member advised that if they had a bilingual PPMID they would be happy to install it against the system but would not be able to use the OTA functionality. The CSC member reiterated that there is a high cost for something that is not considered a problem and will also prevent useful OTA upgrades from being possible.

A CSC member (JS) highlighted the importance of the CSC challenging the business case of modifications. The CSC member observed that there seemed to be more problems resulting from this change than would be solved by implementing it. Therefore, the CSC member suggested that the business case and its consequences need more consideration if it is to be taken forward. The Chair advised that this discussion will be captured in the Modification Report, and more thoughts can be gathered when the modification goes out for the Modification Report Consultation (MRC). The CSC member asked if it would be more efficient to go back to the Proposer and ask if they want to continue with this modification based on the discussion here. The Chair advised that the Proposer was present at the meeting. A CSC member (DD) advised that when the Impact Assessment for this modification was returned, they assumed it was being taken away to see if the cost benefit was worthwhile. The CSC member suggested that not much more can be done in this meeting, and that it would be best to progress it forward, and have it presented to the Change Board following the MRC. The Proposer (DW) suggested that they can gain more insight from the MRC responses on how to progress with this modification. The Proposer (DW) advised that they would consider if the modification should be progressed further.

The Chair advised that all these points of discussion will be included in the Modification Report and recommended that this modification be progressed to the Report Phase to gain more feedback.

The CSC:

- **AGREED** that MP202 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP202 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.

When discussing the update provided for CSC 51/01, SECAS (BG) advised that SECAS has been approached by the Proposer and one Large Supplier, requesting MP219 be implemented as an ad-hoc SEC Release. SECAS (BG) noted comments from the Proposer that they collect Consumption Data from consumers who are non-domestic, and as such do not have an In-Home Display (IHD). Without an IHD, these consumers find it difficult to provide consent to the Supplier for an Other User to collect their data. A CSC member (EL) noted that it is only a small customer base that do not have an IHD. They also questioned the costs associated with an ad-hoc SEC Release in comparison to a regular SEC Release. The Chair advised that there will be no costs associated with an ad-hoc SEC Release as it is a text-only change. The Chair agreed that it is a small number of consumers, and mentioned that the Supplier was a Business Supplier, and therefore supplied to non-domestic consumers. The CSC member advised that they still had major concerns around this modification, and raised a question about the information in the Modification Report which mentioned this modification would enable the Proposer to prevent black outs during the winter months. SECAS (BG) advised that this referred to allowing Suppliers to engage with Other Users and their services would allow information to be passed to the National Grid Demand-Flexibility Service, which in turn will assist the UK in energy management and help to prevent the possibility of blackouts.

A CSC member (EJ) expressed confusion around the example used by SECAS for the current process of collecting consent whereby the energy bill sent by the Supplier must be requested back as a form of consent. Another CSC member (JS) noted the information provided by SECAS which showed the responses to the Refinement Consultation. They added that it should be taken into account that two of the supportive responses to the Refinement Consultation came from the Proposer's organisation, and the organisation which owns the Proposer's business. As such, the member argued that this should be seen as one supportive vote, rather than two.

The Chair asked the Proposer (MR) to clarify the number of non-domestic consumers which could be impacted by the issue of not having an IHD. The Proposer advised that this refers to 5 million non-domestic consumers. The Chair noted that potentially not all of them have smart meters.

The Chair asked the Proposer to elaborate on the energy bill being the preferred method of collecting consent from the consumer. The Proposer advised that the Privacy Controls Framework (PCF) provides a number of ways in which consent can be collected, with the energy bill being one of a number of options for consumers. A CSC member (EL) questioned how the Proposer determines whether a consumer is domestic or non-domestic. The Proposer explained that IHDs are a common form of identifying domestic consumers to ensure consent is being obtained from the bill-payer. The Proposer advised that the one way to identify a non-domestic consumer is to ask for a copy of their energy bill to ensure they are collecting consent from the bill-payer. The Proposer stated that the aim is to identify the person in the organisation responsible for paying the bill, and not if they are domestic or non-domestic. The Proposer stated that in order to collect data from the Meter Point Administration Number (MPAN), they need to identify the person who is the legal owner of that data and the individual within the organisation who can consent for us to access the data within the MPAN.

A CSC member (EL) disagreed and stated that the process outlined was incorrect. The CSC member advised that there is a clear difference between the bill payer and the person responsible for the supply (for example where there is a tenant and a landlord). The CSC member advised that the consumer needs to be spoken to directly. The CSC member asked why the MPAN is needed, and the Proposer advised that it is required to send messages to the meter to collect data. The CSC member

suggested that this is different to getting consent. The Proposer advised that this process has been included in the Modification Report. The Proposer explained that it is being requested to allow a Supplier to request the Other User to access data they have legal consent to access and process. The Proposer explained that the Supplier will remain as the Data Controller, whilst the Other User will act as the Data Processor. The Proposer advised that all Suppliers have data processing relationships with other organisations, and they are asking for this to be applied to the SEC.

The CSC member asked if the consumer or Supplier is aware of the Other User acting on their behalf. The Proposer advised that the Supplier must be contacted about this, as they are the Party employing the Other User to collect data on their behalf. The CSC member asked why the Supplier cannot provide the consent needed for the Other User to collect the Consumption Data. The Proposer advised that they had raised this modification last winter to make the Demand-Flexibility Service (DFS) easier. At the moment, in order for the Other User to get data from the meter to the consumer, the Energy Supplier must provide them with the customer's details, at which point the Consumer will be approached to obtain their Unambiguous Consent. The Proposer explained that this modification is requesting that the Energy Supplier chooses a pool of customers they would like data from, the Supplier gains consent from that consumer and then directs the Other User to collect the data on their behalf. The Proposer highlighted that there is no scenario where the Other User can get data without consent from the consumer or direction from the Supplier. The CSC member advised that this appears to be in contradiction to the slides presented by SECAS, as there has been no mention of the bill payer. The Proposer advised that there are various ways of obtaining explicit consent. Although not all possible scenarios had been presented on the slides, the process had been explained in the Modification Report. The Proposer added that without this change, the easiest way for Other Users to identify non-domestic consumers is by getting a copy of their energy bill, and they use IHDs to identify domestic consumers. However, not all domestic customers have IHDs, so other methods need to be used. But with the implementation of this modification, all the Other User will need is direction from the Energy Supplier that they can collect the Consumption Data from that Energy Consumer.

A CSC member (EJ) stated that they thought the scope of work was about Other Users being able to perform data gathering for the Supplier, to avoid the need for collecting extra consent from the consumer. The CSC member also expressed concern about distrust the consumer might have of a third party collecting their data. The Proposer advised that this modification is put in place to allow the Energy Supplier to work with an Other User, but the Consumer must be made aware of the Other User processing their data before it can be collected. The Proposer explained that there are two separate relationships in this situation. The first is the Other User finding the consumer and asking them for consent, and the second is the Energy Supplier asking to use a consumer's data in a slightly different way. The CSC member expressed confusion but was in agreement with the second point. The CSC member asked if the Energy Supplier must go to the consumer and ask for consent to sign off the DFS anyway, should there not be an extra option to include permission for 'Company X' to collect your data. The CSC member advised that they thought DFS involvement was not needed, but now it may appear to the consumer as if they are being approached by the DFS for consent. The CSC member questioned the need for the modification on this basis. The Proposer advised that Other Users need consent from Energy Suppliers in a way that is approved by the SEC Panel. The CSC member noted that it appears that the Proposer is offering a broader range of services than those outlined in the Modification Report. The Proposer stated that this is an example of one service this modification can better support but highlighted that the summary of the modification remains the same, even though not all scenarios have been noted in the Modification Report.

A CSC member (JS) suggested that they would be more convinced that this modification provides value to consumers if it was raised by an Energy Supplier, or a Party who will incur costs in the

implementation of this modification. The Proposer advised that this modification does not cost Parties anything unless the Energy Supplier contracts an Other User to do the work, at which point they would need to update their privacy notice and relevant internal processes. The CSC member noted this, but suggested that if a Supplier found the existing process an issue, then they should have raised this modification. The CSC member expressed concern around the unintended consequences of this, and how it might affect general confidence in security of consumer data. The Proposer advised that this modification was raised in a way that stops this from happening, because the Other User can only collect data as instructed by the employing party. SECAS (BG) advised that they have checked with the SECAS Data Privacy Department and the SEC Lawyer to ensure there are no unintended consequences. SECAS added that there have been three changes to Privacy Control Framework (PCF) to ensure data can only be used for its explicit purpose. The Other User is limited to collecting the data and passing it back to the Supplier and cannot use the data for any other purpose than specified by the employing Party.

A CSC member (EL) pointed out that the debates during the meeting do not appear to have been included in the Modification Report. They noted that as this is an Authority-Determined Modification, and stated that all discussions should be included before Ofgem make their decision on the modification. They also noted that there will be challenges for Suppliers in dealing with customer queries if this modification is approved. The Proposer (MR) clarified that Suppliers will only need to change processes if they choose to employ an Other User. If SEC Parties do not choose to contract an Other User then they are not required to alter their privacy notice. Therefore, any costs associated with this modification for SEC Parties will come from their decision to contract an Other User, which should be expected. SECAS (BG) noted this point and supported the comments the Proposer made were correct. The CSC member asked if the Other User will stop collecting the data when there is a Change of Supplier (CoS). The Proposer confirmed it would, and that the Energy Supplier needs to constantly update the Other User to ensure they are aware of the correct consumers. The CSC member advised that no Energy Suppliers are sub-contracting Other Users to carry out functions they can do themselves, and asked who they can refer to see how this will work. The Proposer advised that this is called out in standard General Data Protection Regulation (GDPR). The CSC member advised that they would prefer to see this written down and outlined, in order to completely understand where liability lies in these situations. The Proposer agreed with this. SECAS (BG) advised that it was added to the legal text that the Supplier is responsible for the actions of the Other User that is collecting the data. Therefore, the employing SEC Party will have to keep the Other User informed, and they will be liable for the action of the Other User if they do not.

A CSC member (JS) acknowledged that SECAS have put a lot of work into this modification, but that some members might be more comfortable with progressing this modification if something more simplified could be provided, such as a diagram, as not all members are data experts. The Proposer agreed, and suggested a diagram would be useful.

The Gemserv Data Protection Consultant (ZA) advised that as part of the legal text to this modification, the Other User will be limited to collecting Consumption Data as instructed by the employing Party. They added that the Other User will not be able to use the collected data for any other purposes. They advised that the contract between the Supplier and Other User is important, as it is the legal basis for permitting the Other User to collect the information. The legal text has also been drafted in such a manner that the employing Party will still be liable for the actions of the Other User. This is to ensure that the Supplier notifies the Other User when they must stop collecting data if there was a Change of Supplier. In turn, this will prevent the Other User from collecting Consumption Data from an Energy Consumer who does not belong to the employing party. They clarified that this

addition to the legal text means that they would expect to see reference to the pausing of collecting data upon a Change of Supplier in the contract between the employing Party and Other User.

A CSC member (JS) asked if the Performance Assurance Framework would apply here to ensure that the Other SEC Party adhere to these conditions, as from a Supplier perspective there is a detailed security audit. The Gemserv Data Protection Consultant advised that this is considered by an Independent Privacy Assessment (IPA). The Chair added that the IPA auditor checks that a Party has only accessed the information it has been given permission to access. The CSC member still had concerns around the Other Party adhering to this. The Proposer advised that if the Other User fails the audit they will be suspended.

The Chair asked the members if they want this modification to be brought back again next month, or if they are happy for this discussion to be included in the Modification Report and moving to the Report Phase. The majority of the CSC members preferred that the modification be brought back to the CSC at the next meeting. The Proposer acknowledged this but advised that the DFS process starts again in October, and they would like to see this modification in place before then. The Chair advised that once this modification returns to the CSC in July, it will then need to go out for consultation, go to the Change Board in August, and then be sent to the Authority for approval. As a result, the modification will not be ready for implementation until at least mid-October if the Authority approves it.

The CSC members highlighted the importance of all discussions around this modification being captured, despite it being repetitive in nature.

The CSC:

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

DP242 'Change to Operational Metrics to Measure on Success'

SECAS (BB) presented the CSC with a summary of [DP242 'Change to Operational Metrics to Measure on Success'](#), recommending it be progressed to the Refinement Process.

A CSC member (JS) queried the need for this modification, as they assumed that it would be part of the DCC's initial system build to demonstrate they are hitting their Service Level Agreements (SLAs). The DCC (DW) acknowledged this but advised that this was never included in the requirement for the system, and that this modification is aiming to identify potential problem areas, as the DCC does not have a method for doing this due to not being able to measure Target Response Times (TRTs).

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP242 should be converted to a Modification Proposal
- **AGREED** that MP242 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP242

DP243 CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date

SECAS (BG) presented the CSC with a summary of [DP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'](#), recommending it progress to the Refinement Process.

A CSC member (JS) noted that from an operational perspective, 2.2 million Communications Hubs is a year's worth of installations. The CSC member suggested that the issue is not the end dates, but rather poor stock management. They advised that the Modification Report did not quote the information verbally presented that the DCC had, at the request of its customers, continued to manufacture Communications Hubs on CHTS v1.1/GBCSv2.1 due to a flaw in GBCS v3.2 for two years beyond the originally expected date. SECAS (BG) advised it was not referred to in the Modification Report as they only received information on the problem with the Great Britain Companion Specification (GBCS) v3.2 after CSC materials were issued. SECAS advised that the DCC have calculated based on the current installation rates that 24 months would allow for this, which means another modification would not have to be raised to extend the end dates again. The CSC member noted that this was originally raised as a text only change and expressed frustration in it being changed again. The CSC member noted that there are a number of other issues with Central Products List (CPL) entries and the time being extended for non-compliance versions so upgrades can be made.

The DCC (TR) noted that this has taken place four times previously, and questioned if there was an opportunity to try and change the governance around Technical Specification Applicability Tables (TSATs) as described in the SEC, so they can request extensions through the Operations Group (OPSG) or the Technical Architecture and Business Architecture Sub-Committee (TABASC). The CSC member (JS) suggested that this appeared to be more of an operational management issue and not a governance issue. The Proposer highlighted that these Communications Hub versions are still being delivered until April 2024, and that the total volume is close to the current installation end dates.

The Chair advised that SECAS are doing work to look at TSATs and extensions, and they will see what they can do to streamline the process.

The CSC:

- **AGREED** the issue and the impact it is having is clearly defined and understood
- **AGREED** that DP243 should be converted to a Modification Proposal
- **AGREED** that MP243 should be progressed to the Refinement Process
- **AGREED** the timetable for MP243

4. SEC Releases Update

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

A CSC member (EJ) highlighted that they found the SEC Releases Update a very useful part of the CSC meeting.

The CSC:

- **APPROVED** the implementation of the June 2023 SEC Release
- **BASELINED** the first iteration of the June 2024 SEC Release Implementation Document
- **NOTED** the updates on the SEC Releases provided in the paper

5. SEC Modification Timetables

SECAS (BG) 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.

The DCC (DW) suggested that the Prioritisation Matrix slide be amended for future meetings to show what has changed since last month. SECAS (BG) advised that there were other slides that explained the changes since last month, but agreed this would be useful to add to the Prioritisation Matrix slide.

A CSC member (JS) noted that when looking at the matrix, it seems that some modifications move to the top and right based only on time and urgency, and questioned if [DP242 'Change to Operational Metrics to Measure on Success'](#) and [MP231 'Firmware upgrade pathways'](#) have been given too high of a value because of this. The CSC member suggested that modifications such as these might only need to be moved up or across, and not diagonally.

A CSC member (EJ) asked for an update on [SECMP0028 'Prioritising System Messages'](#) and [DP240 'Service Request Management'](#). SECAS (KD) advised that there was a potential overlap with SECMP0028 and work that the DCC was already doing, but they will be requesting an Impact Assessment at next month's Change Board meeting. In regards DP240, SECAS (KD) advised that they are currently in discussions with the DCC about whether this modification is required or if it can be managed by the DCC as part of their system.

A CSC member (DD) asked for an update on [MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#) as there was some discussion on it in a recent SMDG meeting. SECAS (BG) advised that this modification is currently out for consultation, but another Preliminary Assessment might be requested when it returns.

The CSC:

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

6. Any other business (AOB)

The Chair asked the members if they would prefer to continue receiving the modifications for each meeting with the Modification Report and its annexes combined into one document, or if they would rather have the documents separately. The majority of the CSC members preferred to have the documents combined in the one document, as they felt it was more accessible and more easily searchable. However, the CSC members advised that SECAS should consider providing them with the meeting slides on the same day as the meeting documentation is sent out. One CSC member said they preferred the documents separately and the Chair confirmed that the documents should be available individually on the SEC website.

The Chair also advised the CSC members that SECAS are holding an in-person SEC Party Engagement Day on 19 July 2023, and to email SECAS@gemserv.com if they would like to attend.

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

Next Meeting: 18 July 2023