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SEC Change Sub-Committee Meeting 55_1909

19 September 2023, 10:00 – 12:00

Teleconference

SECCSC_55_1909 – Final 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)
Network Parties	Kelly Kinsman (KK)

Representing	Attendee
Utilita	George MacGregor (GMcG) <i>(part meeting)</i>
EP Tech Solutions	Rahul N Mudliar (RNM)
DCC	Chris Thompson (CT)
	Rosie Davies (RD) <i>(part meeting)</i>
Ofgem	Scott McPhillimy (SMcP)
SECAS	Rachel Black <i>(Meeting Secretary)</i>
	Kev Duddy (KD)
	Ben Giblin (BG)
	Simon Grimwood (SG)
	Bradley Baker (BB)

Apologies:

Representing	CSC Member
Other SEC Parties	Jeff Studholme

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
54/01	SECAS to change the title of DP245 to 'SMKI Document Set Changes 2023'.
	SECAS updated the Draft Proposal title accordingly. Status: CLOSED
54/02	SECAS to review the priority status of MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'.
	SECAS updated the priority status of MP239 from 'low' to 'medium' priority. Status: CLOSED
54/03	SECAS to seek information around the scale of each root cause and the views of the Proposer and DCC for MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'.
	SECAS and the DCC discussed this, and have concluded that it is not possible to separate out the information as requested. Status: CLOSED
54/04	SECAS to examine the prioritisation scoring of SECMP0028 'Prioritising System Messages' and update the relevant documents accordingly.
	SECAS updated the priority status of SECMP0028 from 'low' to 'medium'. Status: CLOSED
54/05	The DCC to confirm whether DP240 'Service Request Management' should be withdrawn or returned with further clarification.
	This modification has since been withdrawn. Status: CLOSED

3. SEC Modification Progression

DP249 'Housekeeping Changes for the November 2023 SEC Release'

The Smart Energy Code Administrator and Secretariat (SECAS) (AB) presented the CSC with a summary of [DP249 'Housekeeping Changes for the November 2023 SEC Release'](#), recommending it be progressed as a Fast-Track Modification.

A CSC member (EJ) queried if DP249 will go out for Modification Report Consultation if the CSC agrees for it to be fast-tracked. The Chair advised that if the CSC agrees to fast-track this modification, it will be approved by the CSC, and Parties will have 15 Working Days in which they can object to the CSC's decision. The member asked if the modification will be brought before the Change Board. The Chair advised that as a fast-track modification it will not, as it is a straightforward modification that is only making minor amendments to SEC documents.

Another CSC member (EL) asked why this modification is being fast-tracked. The Chair advised that this modification has been raised to correct minor typographical and grammatical errors in SEC documents, and fast-tracking is a process that SECAS uses when making minor amendments such as this. The Chair added that it saves time and effort, and is not a modification that requires a consultation. The CSC member agreed with the explanation.

The CSC members noted that there was a duplicated part of a sentence in the legal text (Section 11.7(m)). The Chair advised SECAS would amend the duplicated section.

The CSC:

- **AGREED** the issue and impact as clearly defined and understood
- **AGREED** that DP249 should be converted to a Modification Proposal
- **AGREED** that MP249 should be progressed and approved as a Fast-Track Modification
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

There will now be 15 Working Days for any SEC Party who wishes to object the CSC's decision. This referral period will close at 5pm on Wednesday 11 October 2023. If no objections are received, the decision will be final.

MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'

SECAS (BG) presented the CSC with a summary of [MP243 'CHTS v1.1 and GBCS v2.1 Installation End Date and Maintenance End Date'](#), recommending it be progressed to the Report Phase.

A CSC member (EJ) expressed confusion in relation to the Refinement Consultation (RC) responses. The member advised that it appeared that the three respondents were unclear about the Maintenance Validity Period (MVP) end date not being extended. The member asked if the Suppliers who responded know and are content with the reasons for this, or is there still uncertainty around this. The member noted that this has been discussed frequently in Sub-Committee meetings, but queried if the impacts of only extending the Installation Validity Period (IVP) had been fully understood by Parties during the Refinement Consultation. SECAS (BG) acknowledged the member's concerns, noting that SECAS had received three questions from two different Parties during the Refinement Consultation which had been addressed. The first respondent questioned why only the IVP was being extended, with the second respondent questioning whether firmware upgrades and processes for raising

Incidents would be unaffected. SECAS (BG) confirmed these processes would remain as they are now and highlighted the fact both respondents were supportive of the modification. The CSC member (EJ) acknowledged these comments.

The Chair stated that it is only the DCC who will be impacted by the MVP end date not being extended. They advised that once the Communications Hub is installed, the DCC are under obligation to upgrade the Device to the latest version of firmware immediately. However, if the MVP end date is extended, the DCC obligation is pushed out by two years, and this could lead to Devices remaining on firmware versions which are not the latest available. A CSC member (EJ) questioned whether the Supplier would need to organise a site visit if the DCC was unable to complete an OTA firmware update on the Device. They acknowledged this was the current process, but the extension of the MVP would provide them more opportunities to do so in the timeframe.

The Chair noted that further discussions are ongoing with the Technical Architecture and Business Architecture Sub-Committee (TABASC) about how Technical Specification Applicability Tables (TSAT) will work in the future. They added that currently the TSAT tables are not achieving their intended purpose to drive behaviour in relation to installing Devices by certain dates, so the investigation will determine what actions should be taken in future to ensure the issue identified in MP243 does not occur again.

The CSC:

- **AGREED** that MP243 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP243 should be progressed as a Self-Governance Modification

DP246 'DCC User access to metadata via the DCC Self-Service Interface (SSI)'

SECAS (SG) presented the CSC with a summary of [DP246 'DCC User access to metadata via the DCC Self-Service Interface \(SSI\)'](#), recommending it be progressed to the Refinement Process.

A CSC member (DD) queried why consent is needed in this situation, as it does not appear to be dealing with personal data. SECAS (SG) advised that metadata includes consumption-based data such as consumption logs that any DCC user can access without the consent of the energy consumer. SECAS (SG) also advised that it contains records of Service Requests (SRs), timestamps, and User ID (Identification). The member acknowledged this, but disagreed that this amounted to sensitive information that required consent. Another CSC member (EL) suggested that the information contained is the header, and it could potentially identify a consumer who is using prepayment or not. The member added that an audit showed that various Parties had access to this data but had no need for it, and the purpose of this modification is to put restrictions in place so only Parties who need access to the data can view it. The CSC member (DD) noted this, but advised that there is no actual consumption data payload that is exposed. The other CSC member (EL) agreed, but highlighted that someone has sent the Service Request Variant (SRV) and has obtained that response. The member stated that the information should only be available to the Supplier, which is a requirement of this report, and this is why a modification must be raised. The CSC member (DD) noted this, but queried what is currently being breached. The member acknowledged that any User could see these types of requests that are sent, but they are unsure why it is considered a privacy breach if you cannot view personal information.

The Chair noted these comments, and asked if the CSC agreed to progress this modification to the Refinement Process to answer these questions, or keep the modification in the Development Stage until these questions are answered.

The CSC member (DD) queried if this should be considered a data privacy issue. SECAS (KD) advised that this issue had been initially raised by the SECAS Security team and it was presented to the Panel for discussion as it related to Privacy. The Panel then requested that a modification be raised to address this issue. A CSC member (EL) advised that the concern is that anyone could run the report, and it was not intended for anyone to run it. The member reiterated that it was being used by Parties who have no need to access the information. The CSC member (DD) agreed that this was an issue that needed to be resolved, but queried if it was a privacy breach. They noted that you can see if a consumer uses prepayment or not, but you cannot see how much they are using.

The Chair acknowledged these comments, and proposed that the modification be progressed to the Refinement Process to gain further clarity.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP246 should be converted to a Modification Proposal
- **AGREED** that MP246 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP246

DP247 'Future Dating of Service Requests for SMETS1 Devices'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP247 'Future Dating of Service Requests for SMETS1 Devices'](#), recommending it remain in the Development Stage.

A CSC member (EL) advised that the principle of the enrolment and adoption of Smart Metering Equipment Technical Specifications (SMETS)1 Devices is defined by the lowest common denominator, and if a functionality was not supported by all Devices then it was not adopted. The member advised that originally, it was suggested that the DCC could enact the specific Device behaviours, but it was too expensive and would take a long time. The member asked if Suppliers would have to update the Device if the Device does not support future dating. The member noted that Suppliers would have to build lots of functionalities into their processes to support this capability if Device behaviour differed. The member advised that there will be challenges in understanding which Devices work or not. The Proposer (RD) advised that all SMETS1 Devices support future dating, but they are unsure how well this transfers over to DCC User Interface Specification (DUIS) services. They explained that the intent of the solution, from a Service User perspective would be that the capability of the Device would be invisible. They advised that the Data Service Provider (DSP) recognise this service reference, and can develop future dating, which is then sent to the Device. In a scenario where the DSP realises it cannot carry out this function, it will carry on using future dating patterns, and when it is completed will depend on how much is in the queue. However, if a Device does support future dating, it will be completed as near a date and time as the request. The member acknowledged this, and advised that this had not been included originally as the changes were extensive when first discussed.

Another CSC member (DD) agreed with this. They advised that the issue with SMETS1 behaviours had been discussed originally, and agreed that it was good news if the DSP can now handle the situation. The member noted that future dating usage must also be taken into consideration, as it

could be User systems rather than DCC User behaviour that is the main cause of the issue. The member noted that the DSP must consider whether or not to send future dated Devices, and to consider impacts to Users and their expectations, as there would be slightly different responses. The Proposer agreed that the responses would be slightly different, but they have not reached that level of detail yet in development.

The CSC:

- **AGREED** that DP247 should stay in the Development Stage to fully define and understand the issue

DP248 'RDP Requirements for DCC Gateway Connections'

SECAS (KD) presented the CSC with a summary of new Draft Proposal [DP248 'RDP Requirements for DCC Gateway Connections'](#), recommending it remain in the Development Stage.

A CSC member (EJ) asked if the virtual gateway connection idea had been considered previously or if it was a new idea. SECAS (KD) advised that it was a new idea, and would need to be tested. Another CSC member (DD) noted that the Modification Report suggests that the virtual gateway connection was not a concept when the SEC first went live.

The CSC member (EJ) asked if the modification will still be presented to other sub-committees if it remains in the Development Stage. SECAS advised that it would, and they will meet with the Chairs of the other Sub-Committees to discuss if it needs to be brought to them for discussion.

The CSC:

- **AGREED** that DP248 should stay in the Development Stage to fully define and understand the issue

4. SEC Modification Timetables

SECAS (BG) provided an update on the timetables for Modification Proposals, providing an updated Prioritisation Matrix and summaries of high and very high priority modifications.

A CSC member (EJ) observed that [DP218 'Review of the SEC Charging Methodology'](#) appeared to be progressing very slowly. The Chair acknowledged this and advised that the reason for this was that the DCC are in the process of establishing what fixed costs need to be separated out without distributing information which could be deemed to be confidential or commercially sensitive. The DCC (CT) agreed with this statement. The Chair added that the slow progress of the modification will be discussed at the next SEC Panel meeting. The CSC members acknowledged this but advised that it was frustrating, as DP218 is an important modification.

While discussing the modifications that are currently on hold, a CSC member (EJ) asked if another party could adopt [DP197 'Reallocating Third Party Communications Hubs in the Event of a SoLR'](#) to help its progression. The Chair advised that a modification cannot be adopted by another party until it is withdrawn. When this occurs, SECAS will send an email to industry and if someone wishes to adopt it they can do so.

While discussing some anticipated modifications, SECAS (KD) stated that they are discussing the 'GFI Sunsetting' with the Chair of the Energy and Utilities Alliance (EUA), and will be presenting it to the British Electrotechnical and Allied Manufacturers Association (BEAMA) members. They advised

that the DCC has also raised it in those trade organisation forums, and has not received feedback from manufacturers saying that they wish to keep the service.

While discussing 'Streamlining the Comms Hubs returns process', a CSC member (DD) queried why Communications Hubs (CH) would not be decommissioned. The Chair advised that there are several reasons for this, such as training issues or if the decommissioning process is not complete before the Device is removed. The Chair advised that SECAS still needed to investigate this matter further before raising this as a Draft Proposal. The member suggested that one solution could be to allow another Party to send the Service Request to decommission the Device request. The Chair agreed that this could be an option, but that SECAS would continue to gather more information before returning to the CSC.

A CSC member (EJ) queried the recently withdrawn modifications [DP228 'Other User Demand Forecasting'](#), [DP237 'Management of Emergency Firmware Updates'](#), and [DP240 'Service Request Management'](#). The member stated that the email to industry regarding the withdrawal of these modifications did not contain the usual line stating that Parties can adopt these modifications. The member asked if this was also the case for these modifications. The Chair advised that Parties could adopt a withdrawn modification within the 10 Working Days. However, there is no requirement in the SEC for SECAS to communicate this with Parties each time a modification is withdrawn and SECAS had received feedback suggestion that it should not include this information in the email.

The CSC:

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

5. SEC Releases Update

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

No comments were received from the CSC.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper

6. CSC Meeting Dates for 2024

SECAS presented the CSC with the proposed CSC meeting dates for 2024.

The CSC **NOTED** the proposed meeting dates for 2024 and **DEFERRED** the decision until the next CSC meeting.

7. Any other business (AOB)

SECAS (SG) presented the CSC with a summary of a new issue "Traffic Management – Required User Actions' to provide feedback on making DCC Guidance issued by Panel mandatory.

The Proposer (GMcG) added that there has been poor performance over the past few price change windows. However, they advised performance is improving. They advised that the Operations Group and the DCC have been working together to improve the performance. They advised that the

modification will be looking to make the DCC guidance mandatory. They advised that it is a cost-effective approach to tackle issues they encounter during heightened traffic periods. However, they noted that this would have to be agreed in principle and then enforced further down the line. They stated that as the system becomes more utilised, the industry will see more periods of heightened traffic, and it will no longer only affect price changes.

A CSC member (DD) advised that they are unsure what the intended solution is, and asked if a forum will be established to investigate this. The Proposer suggested that OPSG might initially investigate this, but it would need to be approved by Panel.

The Chair asked if this would remain as guidance, or if something will need to be added to the SEC to instruct everyone to abide by this guidance. The Proposer advised that that is the intention, but they want SEC Parties to have the opportunity to give feedback at sub-committees.

A CSC member (DD) raised concerns as there are various DCC guidance documents that are not covered by the SEC, and the purpose of DCC guidance is to add useful information, such as DUIS. The Proposer noted this, and advised changes would have to be made to the SEC if this was implemented. They advised they would check with the Panel why it is only being introduced as guidance now. The Proposer noted that the Panel cannot require SEC Parties to follow specific actions around periods of heightened traffic or capacity constraints. They added that they would not be looking at any DCC guidance that currently exists.

SECAS (RB) advised the CSC that the Panel Information Policy has been updated to v6.0 and outlined the key changes to each of the classifications in terms of information sharing.

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

Next Meeting: 17 October 2023