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SEC Change Sub-Committee Meeting 57_2111

21 November 2023, 10:00 – 12:35

Teleconference

SECCSC_57_2111 – 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)
Network Parties	Kelly Kinsman (KK)
Other SEC Parties	Jeff Studholme (JS)

Representing	Attendee
DCC	Sasha Townsend (ST)
	David Walsh (DW)
OFGEM	Scott McPhillimy (SMcP)
	Jamie Flaherty (JF)
SECAS	Rachel Black (<i>Meeting Secretary</i>)
	Kev Duddy (KD)
	Ben Giblin (BG)
	Simon Grimwood (SG)
	Khaleda Hussain (KH)
	Georgiana Severin (GS)

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.

The CSC noted that comments had been raised on the last meeting minutes. The CSC **AGREED** the amendments to be made and **APPROVED** the minutes as final.

2. Actions Outstanding

Action Reference	Action
56/01	SECAS to obtain feedback on support for MP219.
	SECAS have obtained feedback on support for MP219. Status: CLOSED
56/02	SECAS to communicate to the CSC what was discussed in their meeting with Ofgem.
	A few CSC members advised that the email sent out on 24 October was not in their inbox. SECAS resent the email to the members after the meeting. Status: CLOSED
56/03	SECAS to confirm how the CSS to DCC gateway is governed.
	SECAS advised that they referred to the legal text in MP200 'Faster Switching consequential changes to the SEC' , which advised that this could be complete through the Virtual Gateway Connection. However, SECAS advised they would leave this action open until next month's meeting. Status: OPEN
56/04	SECAS to fix the February 2024 RID link on their website.
	SECAS advised that they fixed the link on their website shortly after the last meeting. Status: CLOSED
56/05	SECAS to ask Change Board what information they would like on modification progress.
	SECAS discussed this with the Change Board members. The members advised that they would like to see a more condensed version of the CSC timetables update in future meetings. Status: CLOSED

3. SEC Modification Progression

SECMP0028 'Prioritising System Messages'

The Smart Energy Code Administrator and Secretariat (SECAS) (SG) presented the CSC with a summary of [SECMP0028 'Prioritising System Messages'](#), recommending it be progressed to the Report Phase.

A CSC member (DD) highlighted that the modification title was 'Prioritising Service Requests' on the meeting slides and asked when the title had changed. SECAS (SG) advised that this was an error. The Chair confirmed that the correct title is 'Prioritising System Messages'.

Another member (JS) stated that it would be beneficial if SECAS could quantify the benefits against the costs of this modification. The member added that this is something that should be considered for all modifications. A member (EL) agreed with this and advised that the difficulty in obtaining this information has contributed to this modification's slow progression. They stated that it appears to be a very expensive modification, yet there doesn't appear to be a strong business benefit. The member (JS) asked if there are other modifications that have been raised that can assist with this, such as [MP253 'Traffic Management for Price Control Events - User Actions Required'](#), as SECMP0028 was raised a long time ago. SECAS advised that SECMP0028 proposes to put a mechanism in place to prioritise all messages at all times but will be most effective during periods of high traffic. However, MP253 focusses on traffic specifically during price control events. The member questioned if this modification raises an issue that is worth mitigating. They highlighted that a long period of time has passed since SECMP0028 was raised, yet it has not been an issue.

A member (EJ) asked if it was the DCC that would decide any changes in priority levels. SECAS advised that the DCC would have to send out a consultation on the proposed changes and then they would need to be approved by Panel (with input from the relevant Sub-Committees). The Chair agreed and noted that this is referred to in the governance of the Traffic Management mechanism document.

The CSC:

- **AGREED** that SECMP0028 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

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 (EL) referenced the Modification Report, which stated that the costs of the modification are limited to SECAS implementation costs. They noted that if there is a large increase in traffic across the DCC System, further DCC staff will be needed to manage demand. In turn, this would be passed onto Suppliers through DCC charging. They also noted that any increase in demand has the potential to prevent other functions from operating as they should do. The member thought it doubtful that Other Users would charge consumers for their services. Another member (JS) noted that there may be an increase in DCC traffic if Consumption Data is collected by both the employing Party and Other User in this modification.

The DCC (DW) stated that there are no DCC System changes associated with MP219 itself and any estimated increase in traffic would not require further procurement of capacity. They added that the projected increase in traffic will be covered under business-as-usual running costs, hence why this is not considered to be a System impacting change. The member (EL) asked if there are explicit costs associated with the implementation of this modification on DCC. The DCC advised that estimating traffic is covered by the Demand Forecasting team, which is why it is considered to have zero costs. The Chair added that this approach followed the precedent set by [MP162 'SEC changes required to deliver MHHS'](#), where SECAS had originally included the traffic impacts within the modification costs. Ofgem subsequently decided to separate the costs for any additional traffic out of the modification and stated that increases in system traffic was the responsibility of the DCC, and should not be considered as part of the modification. The Chair suggested receiving costs from the DCC on how much a 1-2% increase would be, but this might not be possible and added that any information would be included in the Modification Report.

A member (DD) expressed concern in relation to the issue identified in the modification. They noted the Modification Report stated that it takes time to collect Unambiguous Consent from consumers. They suggested that focus should be given to why the consumers are not engaging with the current Unambiguous Consent processes which are used by SEC Parties, rather than removing them completely. SECAS (BG) advised that the issue the Proposer is trying to resolve is where consumers express an interest in a service, such as the Demand Flexibility Service (DFS), but then do not engage with the process when they need to complete the consent process which Other Users need to fulfil before collecting their data.

The member disagreed that MP219 will facilitate SEC objective (a)¹. The Chair suggested that the implementation of MP219 will reduce the time it takes to receive consumer consent and will increase consumer participation in DFS. Therefore, it will potentially facilitate SEC objective (a), provided they agree with the points raised. Another member (EL) expressed confusion. They stated that if a consumer wants to access their data but does not have a Smart Meter, then the Other User obtaining consent from them is not helping the issue and therefore is not better facilitating SEC objective (a). The Chair noted this and advised that this will be reconsidered.

A member (JS) stated that it is misleading to say there are no costs associated with MP219. They highlighted the time and effort SECAS has spent on MP219 throughout the modification process. The Chair stated that every modification that comes to SECAS deserves the same degree of consideration. They stated that they have spoken with several SEC Parties who are interested in using an Other User to collect Consumption Data on their behalf and have discussed the level of interest with Ofgem. The member queried why all interested Parties did not respond during the consultation process. The Chair acknowledged this and suggested that some Parties may not have had the resources to respond at the time. However, it has become clear that some Parties are showing strong interest for the approval and implementation of this modification.

A member (EJ) queried whether the Other User would reply on the employing Party's Appropriate Permission to collect Consumption Data. The Chair noted that currently, the Supplier will contact the consumer for consent if they want to take part in a scheme like the DFS. Should the consumer agree, then the Other User needs to collect the Unambiguous Consent from the consumer through their chosen consent method, such as an IHD check. The issue is that at this stage, consumers may not have an IHD, or it may be registered incorrectly. At this point the consumer is not able to complete the process and cannot take part in the DFS scheme they have shown an interest in.

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

They stated that if MP219 is implemented, the Supplier can contact the consumer and advise that a third party will be handling their information and will give the consumer the option to opt out of the process if they wish. If the consumer is interested in taking part in a scheme, then their information will be passed to the Other User who will collect the Consumption Data and pass it back to the employing Party.

In relation to consumers not completing the consent process, a member (EL) questioned why the existing problematic methods are not being addressed. Another member (EJ) suggested that under the new process the consumer may be providing their consent when they respond to a Supplier asking if they want to take part in schemes such as the DFS. They stated that the current process means the consumer must give explicit consent to the Other User to fulfil their obligations before collecting the Consumption Data. They stated that the data cannot be used by the Supplier or Other User without this consent. The Chair agreed and stated that the SEC currently states that Other Users have to receive Unambiguous Consent from each Energy Consumer before the Consumption Data has been collected. SECAS (BG) added that the SEC states that Other Users must collect consent by using the methods that are listed as part of the Privacy Controls Framework (PCF). Noting the example where a customer may not have an IHD and does not want to give their bank details, they are excluded from taking part in the DFS scheme because their Supplier does not have the capability to offer the DFS without using the services of an Other User. The DCC (DW) noted that they participated in the DFS scheme last year without having an IHD. SECAS (BG) advised that some Suppliers already hold the Appropriate Permission and the systems to manage schemes such as the DFS and therefore would not need to fulfil the requirements of SEC Section I1.2 when an Other User is collecting data on behalf of a Supplier or Network Party.

The DCC (DW) noted the estimations SECAS made about increases in traffic volumes and noted they would like to see clarification that these figures rely on a 50% - 70% increase in participation in the DFS as a result of this modification.

They noted that there appears to be a high increase since last year to be looking at a 70% increase on DFS participation and added that Large Suppliers may not use this service. The Chair stated that some Large Suppliers have expressed interest in approval of this modification. They advised that this will not lead to the entire 70% increase as this is just an estimate, but will increase participation.

A member (JS) asked when MP219 will be sent back to the Authority for the decision. The Chair stated that it will be sent out for the Modification Report Consultation (MRC) and will then be brought to the Change Board before being sent back to the Authority. The member noted this and suggested that this modification has begun to be justified based on its contribution to the DFS scheme, when this had originally been included only as an unintended consequence. They queried if MP219 will weaken consumer protection. The Chair highlighted that MP219 is not only focused on just the DFS scheme but will include the members concerns in the Modification Report. They reminded the members that the Other User will still be under contract from their employing party. The member (JS) noted this, but stated that if this Modification Report builds on the previous Modification Report, then it is essentially an agent service. Another member (EL) also noted that the Proposer's aim to have MP219 implemented before the next phase of DFS was the main drive to push the modification through the process. However, this will not be possible at this stage given the existing timeline for the modification meaning a decision will be received in early February 2024.

A member (EL) questioned what procedure will be put in place to notify the Other User when a consumer has switched Supplier and their data must not be collected. SECAS (BG) stated that this is included under PCF and is evidence that there is a procedure between the employing party and the Other User. They stated that the Other User will be made aware when consumers switch away from

the employing Party and they cannot collect data from that point onwards. The member asked if there is an explicit requirement in the SEC that the Supplier must notify the Other User when a Consumer has switched Supplier. SECAS (BG) advised that this is included under PCF rather than the SEC. The member asked if this means there will be changes to the PCF. SECAS advised that they have drafted these changes and will present them to the SEC Panel on 28 November 2023. They advised that if they are approved, a consultation will go out following the meeting. The Chair added that industry can respond to the MRC as they will be the same consultation. The member asked if there is a risk the changes to PCF are not approved. The Chair advised that this is a risk. They stated that if the PCF receive negative comments during the consultation, these comments will have to be taken into consideration and a pause in the process may be needed. SECAS (BG) added that the Independent Privacy Auditor will present the PCF changes to the SEC Panel, and gain feedback on what levels of assurance the SEC Panel requests.

A member (EJ) highlighted that when a consumer signs up to an Other User app, they can populate it with historical information from before that consumer signed up to the app. A member (EL) stated that there does not appear to be any restrictions on how far back an Other User can access data, which may cause challenges. The DCC suggested this depends on the function of the Communications Hub (CH) and the Smart Meter, but may vary between models. They highlighted that the DCC cannot hold data for any period of time. A member (JS) asked if the Smart Meter will hold the data, and the DCC agreed. Another member (EL) stated that they do not suggest this issue should impact the progression of MP219. However, they stated that people need to be made aware of this issue. The Chair acknowledged this and advised that SECAS to look into this.

SECAS (BG) stated that SECAS facilitated a meeting between the Proposer and Citizens Advice who noted the improvements that had been made regarding the concerns they had raised. Citizens Advice advised that they would like a dashboard to be introduced where consumers can see their data.

A member (JS) asked for confirmation that the above comments from Citizens Advice are their official view, as it will be important to Ofgem that Citizens Advice are comfortable with MP219. The Chair advised that in a recent meeting, Citizens Advice stated that they would be more comfortable if these points are addressed. The Chair advised that they are confident Citizens Advice are happy with the changes. SECAS (KD) added that Citizens Advice stated they will thoroughly review the Modification Report and provide responses during the MRC.

A member (DD) referred to the Other User only being able to collect data, and mentioned a problem that arose when the Meter Data Retriever (MDR) User Role had been discussed previously. The Chair advised that the assumption is that the both the Supplier and the Other User will be collecting the data. The DCC (DW) stated that the market wide capacity uplift will occur in June 2024. They stated that one feature of this will be Smart Metering Equipment Technical Specifications (SMETS) 1 data cache, which will assist with some of the traffic issue. The Chair advised that it is difficult to give an estimate as they do not know what consumers will participate. The DCC agreed, but added that they can assume the participation will be similar amongst SMETS1 and SMETS2 Users.

A member (EJ) highlighted the tight turnaround for MP219 to return to the Change Board in December, as there will more than likely be a lot of responses to the MRC. The Chair noted this and advised that if the PCF changes receive negative feedback from the industry, MP219 might not return to the Change Board until January.

The CSC:

- **AGREED** that MP219 should be progressed to the Report Phase
- **APPROVED** the Modification Report

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- **APPROVED** the implementation approach

ACTION 57/01: SECAS to investigate how far back an Other User can access data once the consumer gives consent.

DP247 'Future Dating of Service Requests for SMETS1 Devices'

SECAS (KD) presented the CSC with a summary of Draft Proposal [DP247 'Future Dating of Service Requests for SMETS1 Devices'](#), recommending it progress to the Refinement Process.

A member (EL) stated that it was positive to see that the future dating of Service Requests (SRs) could be facilitated by all Devices, as this has prevented the use of functionality in the past. They advised they were supportive of DP247. However, they highlighted that a principle for the enrolment of SMETS1 Devices was to ensure there are not differing processes depending on the Device that is fitted. They noted that different processes have occurred, and raised concerns that another Device specific behaviour could be created.

SECAS (KD) advised that they have engaged with Device Manufacturers and have received responses from all except one. The member (EL) advised that they will need to know which Devices can handle which Future Dated SRs. They emphasised that if it cannot be completed by one Device, it cannot be completed by any Device to align with the principle of 'lowest common denominator'. Otherwise, different processes will have to be built for Devices that will then need to come off the wall in the future. They also highlighted the issue of ensuring Users understand and carry out their actions correctly.

Another member (DD) advised that because Data Service Provider (DSP) future dating is an on-demand request, the response pattern for them is different to Devices.

SECAS advised that they gave that feedback to the DCC, who will investigate this as part of the solution development. The aim is that there is no impact to DCC Users, but this will be investigated further during the Refinement Process.

The member (JS) advised that the Devices that cannot perform future dating need to be named to understand the scale of the impact. Another member (EL) agreed, and advised their Central Products List (CPL) ID could be used to identify them. The DCC (DW) acknowledged this, but advised that there are legality issues in relation to publishing organisational names and functionality.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP247 should be converted to a Modification Proposal
- **AGREED** that MP247 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP247

DP255 'WAN issues during Smart Meter installations'

SECAS (BG) presented the CSC with a summary of new Draft Proposal [DP255 'WAN issues during Smart Meter installations'](#), recommending it remain in the Development Stage.

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The Proposer (EL) advised that the prioritisation of DP255 should increase given conversations which had taken place with the Department for Energy Security and Net Zero (DESNZ). The Proposer advised that DESNZ note this is an issue they have come across when investigating non-communicating Devices. A member (JS) advised SECAS that the value should be increased given the issue identified in DP255 leads to uncommunicative Devices being left at consumer premises. The Proposer agreed and advised that they will discuss the issue with other Parties to gather information regarding the scale of the issue.

The DCC (DW) referenced the Modification Report, stating the Proposer would like to identify scenarios when all Devices cannot be commissioned. The DCC asked the Proposer to elaborate on this. The Proposer advised that the SEC is very binary and simple in its assumption that once a Communications Hub can communicate, all other Devices in that Smart Metering System (SMS) can work. They advised that their aim is to understand why there is different guidance given when the Communications Hub births, as there should be consistent information for Parties to follow. A member (JS) advised that once they receive the volumetrics regarding the scale of the issue, they will pass the information on to the Proposer.

The Proposer highlighted that they experience issues with communications regarding Install and Leave from Communication Service Providers (CSPs) and the DCC Service Desk. They advised there is a very specific process to follow with a Communications Hub being left on site in order to raise a WAN incident, however Parties are not obliged to do so, so the majority do not mean incidents aren't reported. They advised that for Suppliers, there is a difference between Install and Leave and leaving a partially communicative Smart Metering System.

The Chair asked the Proposer if they would like to increase the urgency of DP255, as many CSC members appeared to agree it should be increased. SECAS (KD) readjusted the priority of DP255 as per the discussion, which changed DP255 from a priority of low to medium.

The CSC:

- **AGREED** that DP255 should stay in the Development Stage to fully define and understand the issues

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.

While discussing this month's high priority modifications, a member (EJ) highlighted that the data for [DP218 'Review of the SEC Charging Methodology'](#) was circulated in September, and asked if feedback had been received from Parties yet. The Chair advised that no feedback has been received at present but stated that SECAS and the DCC meet regularly to discuss DP218. In their recent meeting, the DCC advised SECAS that they will give another update to industry by the end of the year. The Chair advised that the DCC have employed consultants to investigate the charging methodology and have completed work on comparing other network charging arrangements. A member (JS) raised concern regarding the DCC employing consultants to investigate an issue the industry has not asked for more information on and questioned the relevance of this. Another member (EL) agreed. They also noted that their organisation must go through various price controls and consistently prove to Ofgem and others how they are spending their money. The Chair acknowledged these concerns and advised that the DCC plan to give an update to industry by the end of the year. A member (JS) asked if the frustration of the CSC on this topic can be raised with the SEC Panel. The

Chair advised they will raise this with the SEC Panel at their next meeting. The Chair advised that SECAS have queried the DCC's methods regarding this, and have encouraged them to update the industry as soon as possible, as this was not what was originally agreed.

When discussing Anticipated Modification 'SEC Alignment with DCC SMETS1 MHHS Capacity Requirements', a member (EL) commented that it would be interesting to understand what costs and benefits will be associated with this modification. They expressed concern that Suppliers would be paying most of the costs. They noted that there is an outstanding action for the DCC to update the Change Board on [MP162 'SEC changes required to deliver MHHS'](#) costs, and asked what changes this Anticipated Modification will make to this. The DCC (DW) advised that this is not a system change and is being taken care of by the capacity uplift. Therefore, they stated there is no additional cost associated with this that can be directly attributed to the modification. The member asked why a change to the SEC is required to allow the DCC to change something they can do at present. SECAS (SG) advised SMETS1 capacity requirements were not included within the solution of MP162, and there a legal text change will be needed in order to align the SEC with the SMETS1 MHHS capacity requirements.

The CSC:

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

5. SEC Releases Update

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

The member (EJ) queried the inclusion of [MP253 'Traffic Management for Price Control Events - User Actions Required'](#) in the June 2024 SEC Release. They stated they were under the impression that MP253 aimed to resolve its issues before the April 2024 Price Change Event. The DCC (DW) advised that the Business Proposer is hoping this will be ready before the June 2024 SEC Release, highlighting that the issue should be less severe when the Price Change Event falls on a bank holiday. This is due to less Install & Commission activities being undertaken.

While discussing the June 2025 SEC Release, the Chair advised that SECAS have included [MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#) as this is the procedure but expect it to be either withdrawn or dealt with differently.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper
- **BASELINED** the November 2024 Release Implementation Document

6. DCC Assessments

The Chair presented the CSC with an update on the open DCC Assessments.

No comments were received from the CSC.

The CSC:

- **NOTED** the update

7. Modification Improvement Project update

The Chair gave the CSC a summary of the Modification Improvement Project that SECAS are undertaking to improve the current modification process.

A member (JS) expressed concern that SECAS cannot meet the current completion date of Action 10, as the month of November is almost finished. The Chair agreed and stated that this action cannot be complete until SECAS have reviewed the end-to-end modification process. The member agreed and noted that it makes sense to align it with Action 11. The Chair agreed.

8. Any other business (AOB)

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

Next Meeting: 19 December 2023

DRAFT