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SEC Change Sub-Committee Meeting 62_1604

16 April 2024, 10:00 – 11:25

Teleconference

SECCSC_62_1604 – Final Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers	Alastair Cobb (AC) *(Alternate)*	British Gas
	Emslie Law (EL)	OVO
Small Suppliers	Daniel Davies (DD)	ESG Global
Other SEC Parties	Jeff Studholme (JS)	Smart Meter Assets
	Philip Doyle (PD)	Reverve Ltd

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
Ofgem		
Grace Royall (GR)		
Smart Energy Code Administrator and Secretariat (SECAS)		
Rachel Black (RB) (Meeting Secretary)	Kev Duddy (KD)	Simon Grimwood (SG)
Khaleda Hussain (KH)	Martin Hanley (MH) (Testing Advisory Group Chair) *(Part Meeting – Agenda Item 3)*	
Utilita		
Kevin Clark (KC) *(Part Meeting – Agenda Item 3)*		

Apologies:

Representing	CSC Members	Organisation
Consumers	Caroline Farquhar (CF)	Citizens Advice
Large Suppliers	Emma Johnson (EJ)	British Gas
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution

1. Welcome and Introductions & Approval of Previous Meeting Minutes

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

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

2. Actions Outstanding

Action Reference	Action
60/03	SECAS to confirm where the additional costs from the November 2023 SEC Release originate from and compare the target and actual costs for other previous SEC Releases.
There was some discussion about Releases costs (summarised below). The Chair advised that SECAS are still investigating this. Status: Open	
61/01	SECAS to find a forum to take responsibility of the TSAT tables.
SECAS (KD) advised that they are still investigating this. Status: Open	
61/02	SECAS to highlight the on-hold modifications in the Prioritisation Matrix and the SEC Modification Register.
SECAS (RB) advised that this was complete after the previous meeting. Status: Closed	
61/03	SECAS to confirm who from the DCC will be presenting the Project Blue updates to the CSC going forward.
The Chair advised they have an idea of who from the DCC will be presenting these updates, but it has not been finalised yet. Status: Open	
61/04	DCC to send SECAS the new dates in relation to SECMP0028.
SECAS advised that this will be addressed during the SECMP0028 discussion. Status: Open	

Action Reference	Action
61/05	SECAS to confirm if Sub-Committees can stop the Proposer progressing a modification through the modification process if they do not agree with it.
The Chair provided an explanation of this. The member (JS) noted the update given. They also highlighted that there were examples where CSC members had agreed for Draft Proposals to be progressed to Modification Proposals without issues being truly defined. Status: Closed	
61/06	SECAS to enquire with Other Users if they would be interested in becoming CSC members.
SECAS (KD) noted that there are no Other SEC Party seats currently available, but will raise this with Other Users the next time a seat becomes available. Status: Closed	

3. Release costs

The Chair advised that SECAS are to provide Release costs after the SEC Release, to ensure the cost of each Impact Assessment is clear. They stated that once all the Impact Assessments are added together, there is an economy of scale, which means including them in the same Release will lower the cost. They advised that SECAS became aware there were gaps in their knowledge in relation to this while working on DP218 'Review of the SEC Charging Methodology', and raised this with the DCC. SECAS then received figures from previous Releases that were in excess of what they expected. Since then, SECAS have been querying with the DCC as to why these figures are different, and if they are accurate. The Chair stated that the DCC informed them that these costs come from Service Providers that have been carrying out Regression Testing.

SECAS (MH) stated that the Testing Advisory Group (TAG) have had no input in relation to the scope of testing, and no oversight of the results.

A member (EL) stated that this goes over and beyond what has been approved by the CSC, and SEC Parties should not incur the costs of this. They added that this has been approved at some point during the governance process, and there must be an audit trail to discover who has approved these costs. They expressed concerns around transparency. The DCC (DW) advised that the testing is being carried out to ensure the DCC system is unchanged by anything they put into it. They advised that this testing is necessary and is authorised by the DCC to ensure the DCC System is not negatively impacted by any changes they make as a result of the Impact Assessment. The member asked if this is funded by the DCC. The DCC advised that the costs are included in the SEC Release. The Chair added that their understanding is that it is authorised by the DCC Board. The member stated that this should be raised with the SEC Panel. The DCC noted this and stated that these extra costs include work not seen by the CSC as it is after approval of a modification. They clarified that they are not questioning the accuracy of teh figures but explaining where the costs have come from. Another member (JS) asked if anything problems have been identified from the Regression Testing, and questioned the necessity of it. SECAS (MH) queried what the scope of this testing includes. They observed that the costs are incomparable to the changes being made. They noted that the DCC have commented on how Service Providers have been alternating testing but noted that the costs should have been reduced.

The Chair acknowledged the concerns raised. They explained that this is being discussed now because SECAS had been asked to discuss SECMP0028 'Prioritising System Messages' and the November 2024 SEC Release. They advised that it was agreed that the DCC would explain the costs of the Release in the May CSC meeting but has been brought forward due to the issues with SECMP0028. A member (EL) advised that the CSC need to understand why the DCC can authorise these costs outside of the modification process. The Chair advised there is a misunderstanding about who should be responsible for these costs. They also noted the issues with timing, as the testing cannot take place until the modification has been approved and the PIT has been complete. The member suggested that anything more than what was agreed in the Impact Assessment is a cost that needs to be paid by the DCC. SECAS (MH) noted that the scope for Regression Testing should be known at that point.

SECMP0028 Costs

The Chair advised that they had been contacted yesterday by the DCC, asking for members to confirm if they still wish to go ahead with the November 2024 SEC Release despite a substantial increase in the cost associated with it. The Chair stated that the DCC had advised them it was critical that the CSC make a decision at this meeting, otherwise, SECMP0028 will miss the November 2024 SEC Release. However, the DCC have since advised that they are unsure of the additional costs and will investigate further before returning to the CSC.

A member (EL) asked if it is possible for the CSC to withdraw their approval of this and questioned the ability for costs to be added after the Change Board has approved the modification. They expressed concern that they had approved costs (stated in the DCC Impact Assessment) that turned out to be incorrect. Another member (AC) noted that there is an expectation that there might be some changes to costs, but the substantial change in these costs will need to be reviewed. The member (EL) noted this but advised that the CSC do not have the process to review this. The member (AC) suggested this be escalated to the SEC Panel to provide guidance. The Chair noted this but stated that the DCC still need to inform the CSC how much the additional costs will be before any decision can be made.

A member (JS) stated if there was a clear layout of the business case it would be easy to include the updated costs. They questioned if SECMP0028 will miss the SEC Release. They also queried what other modifications are in future SEC Releases that need to be reviewed on the same principle. The Chair advised all of them should be reviewed. The member advised that reviewing SECMP0028 will be a process issue. They stated that not capturing the additional costs will impact the industry, and advised reapproval should be considered. The DCC (DW) advised that modifications included in SEC Releases that are impacted are MP178 'Removing DSP validation against the SMI join status for SR8.8.x' and MP211 'Aligning the SMI with the CPL' which may need to be reviewed. However, they highlighted that MP176 'Customer Analytics Reporting' and MP242 'Change to Operational Metrics to Measure on Success' are not part of a formal SEC Release, so no Regression Testing has been carried out on them by Service Providers.

Another member (PD) advised that their understanding was that these costs would be ongoing and embedded into the process. It also appeared to them that this would be part of business-as-usual activities in the future. They suggested the CSC might not be the appropriate forum to consider this, and it should be dealt with elsewhere. The DCC advised that the costs will not affect this as it is a separate line item, which includes one year's worth of them, and is not impacted by this.

A member (DD) agreed with the comments made. However, they noted that there will always be Regression Testing in SEC Releases. They noted that the CSC Terms of Reference (ToRs) advise that the CSC is to draw out all the costs of a modification. They asked if this refers to each modification, or a SEC Release. The Chair advised it refers to each modification. The Chair advised that SECAS have been in discussions with the DCC in recent months about including as many modifications in a SEC Release as possible to make each Release the best value for money. However, they noted that modifications do not always align with this.

The DCC (DW) advised that Regression Testing is the issue, and there is no such thing as average testing. They noted that SECMP0028 is a good example of this, and more scrutiny is needed, but this cannot be worked out until you have scoped out the SEC Release. The Chair noted this but advised it had not been reviewed by the TAG or CSC. The DCC explained that they do not know these costs until after approval of the modifications, agreement of the scope of a Release and testing begins. SECAS (MH) highlighted that Regression Testing of that scale has never been brought before TAG. The DCC agreed.

The Chair referred to JS's query about reassessing all modifications. They proposed that this would not be necessary, as the CSC is responsible for assessing the costs of a modification and what should be in the scope of a SEC Release. After that, it should be the responsibility of TAG to ensure Regression Testing is under control to avoid substantial increases such as this. The DCC agreed.

A member (JS) advised that there needs to be control of what systems require Regression Testing. They stated that if the CSC are to assess each modification with its cost, they need to find a route to estimate what the SEC Release cost will be. For example, if a modification is targeted for the June 2026 SEC Release, the CSC must know how many modifications are already included and their context. Otherwise, they noted SECAS will have to go to annual SEC Releases and do as few as possible. They added that the Regression costs should be attributable to a SEC Release, or else they will be stuck in a circle. The DCC (DW) advised that they have asked their System Integrator for an estimate of tests it thinks needs to be carried out. They explained that it will give an estimate of if it will be low, medium, or high SIT, but it will not estimate the cost. The DCC noted that more work needs to be done as the next steps are discussed.

The member (DD) acknowledged the comments made, but suggested it is not the responsibility of the CSC to carry out this work. However, they agreed that someone needs to understand the entire cost of a SEC Release. Another member (JS) added that this raises concerns in relation to DP218 'Review of the SEC Charging Methodology'. They advised that the costs of change are being underestimated, and the CSC will struggle to find a positive business case when they start adding in additional costs. The Chair acknowledged the points raised and agreed that the CSC cannot take into account Regression Testing for an entire SEC Release, as the CSC are only responsible for reviewing the cost of the modification. They stated that until the scope is clarified further, they cannot address the issue of Regression Testing, which will make the business case harder to assess. The member agreed but suggested that the CSC could review it to confirm the approved testing is appropriate, as long as it does not go over a certain amount. The Chair advised that for SECMP28 there was no positive business side (in cost amount) as it was putting in place a solution to something that had not yet caused a problem. The member agreed, but advised that he believed there could have been if it had been critiqued further. The Chair advised they would agree to taking this on board, so long as they receive feedback from Parties as often little to no information is forthcoming. Another member (DD) advised that SECMP0028 was not expensive, but the Regression Testing made it so, and queried if the CSC should begin this additional reviewing. They noted it would make it challenging for anyone to raise a change.

A member (EL) stated that in order to move forward, the CSC need to discuss the ToR and what is meant by 'end-to-end'. They asked if this includes things that are done after the CSC have approved what they believe to be the final cost. They expressed concern regarding items going through another governance process that the CSC are unaware of but are paying for. They queried who is agreeing to these additional costs and are they SEC Release costs. They noted that the Live Services Criteria (LSC) have a process that goes through and asks the forum if they agree for a Release to go ahead. They advised if the CSC had been made aware of this additional cost, they would have rejected it. A member (JS) noted the comments made and suggested that managing two SEC Releases per annum should be a DCC BAU cost. However, they advised this would need to be reviewed in another forum, and the CSC should carry on as usual. The Chair acknowledged this, and proposed TAG review what the Regression Testing costs are and provide comment to the DCC. The member (EL) advised they were still concerned about who is authorising the additional spending, and what is associated with that testing that does not appear to be part of the modification. They also questioned the view that TAG is responsible for this. They added that there appears to be a step missing in the governance process. SECAS (MH) stated that it is not within TAG's remit to comment on costs. They advised they can only comment on the scope of testing.

Utilita (KC) agreed with the statement that there is a step missing in the governance process. They observed that the CSC approves the SEC Release, then someone reviews it and appears to sign off on the additional cost. They also queried who this is being signed off by.

The Chair acknowledged all the comments raised. They advised that the DCC had for a discussion of the issue of the SECMP0028 additional costs at this meeting but had then backed out stating that the costs need to be clarified They advised the DCC are scheduled to discuss this at the next meeting, but they will contact the members before then if it is more urgent.

The member (EL) highlighted that the business case for SECMP0028 does not reflect the additional cost. Another member (JS) agreed but advised that if the Regression Testing will stay out of the scope of the CSC, then the CSC's position should not change. The member (EL) noted this, but explained that when individuals enquire with them about the cost of a modification, they refer to the Modification Report to provide an answer. However, they noted it is now evident there is a gap and the cost in the Modification Report is not necessarily accurate.

The member (AC) advised that the CSC members need to understand what options are available at the next meeting. They observed that the main issue here is whether all Regression Testing is the same and is it appropriate if it only affects one modification. A member (EL) agreed, and suggested this issue be brought to the SEC Panel. The member (AC) agreed, but advised the CSC needs to be clear on how they want to move forward. The DCC noted that an ad hoc SEC Release would be the same cost. The member agreed, but also noted the timescale to meet the November 2024 SEC Release. Another member (JS) advised that if SECMP0028 misses the November 2024 SEC Release it will miss a critical time of the year as PPM consumers may be left off supply. Therefore, it would not be practical to wait until the next SEC Release.

The Chair noted the comments raised, and advised they will discuss this further at the next CSC meeting.

4. SEC Modification Progression

DP260 'June 2024 SEC Release housekeeping'

SECAS (KH) presented the CSC with a summary of DP260 'June 2024 SEC Release housekeeping', recommending it progress to the Report Phase.

No comments were received from the CSC.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP260 should be converted to a Modification Proposal
- **AGREED** that MP260 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

5. SEC Modification Timetables

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

A member (JS) queried whether MP253 'Traffic Management for Price Cap Update Events - User Actions Required' would have progressed to a Modification Proposal if the Issues Group had been in place at the time. SECAS (KD) advised they were unsure but added that it had been discussed at the Operations Group (OPSG) before being raised as a Modification Proposal. SECAS (SG) explained that the delay to the progression of MP253 as the Proposed Solution will have wider impacts on SEC Parties that had not been considered. As a result, the legal text and associated Code Required Document needs further development.

SECAS (KD) also explained that MP224 'SEC Performance Assurance Framework' had been delayed They advised that actions had arisen from the Working Group that needed to be completed before it was brought before the CSC. One of these was to get a statement from the Security Sub-Committee (SSC) as to why SEC Section G obligations should be excluded from the Performance Assurance Framework. They advised that the SSC had met with Electricity Network Parties very recently and that outputs from this meeting needed to be delivered before the SSC could provide a statement. Therefore, SECAS will bring MP224 to the next CSC meeting to move into the Report Phase.

The CSC:

- **AGREE** the highlighted modifications should be added/removed from the on hold list.
- **NOTE** the new Report Phase date for the highlighted modifications.

6. Post Decision Delivery

SECAS (KH) presented an update on the Post Decision Delivery.

No comments were received from the CSC.

The CSC:

- **NOTED** the updates on the Post Decision Delivery

7. SEC Releases Update

SECAS (SG) 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

8. CSC Terms of Reference

The Chair presented the CSC with the proposed amendments to the CSC ToR.

A member (AC) suggested that the amendments to the ToR should be reconsidered after the previous discussion in relation to the governance of SEC Release costs The Chair agreed, and proposed the CSC approve the current updates whilst continuing to develop changes to resolve this issue. The member suggested the CSC wait until the solution is clarified before approving the updates to the ToR as a whole. The member noted that when the issue is escalated to the SEC Panel that guidance should be provided on how to proceed, and this be incorporated into the updated ToR. The Chair acknowledged this and asked if the members agreed. A member (JS) observed that all the proposed amendments to the ToR are sensible, but do not result in the members having to take any action. Therefore, there is no detriment to deferring them. The Chair agreed, noting that none of the amendments to the ToR are urgent, which gives the CSC time to clarify the governance of SEC Releases. The member also supported AC's suggested approach to provide appropriate solutions along with any escalation to Panel.

The Chair proposed the CSC defer the agreement of the ToR updates until the issue of governance of SEC Releases is resolved. They added that they will need to discuss with the TAG Chair about the assistance TAG can provide, and where the discussion of this issue should take place. The Chair advised they will bring back some solutions on how this can be dealt with.

The CSC:

- **DEFERRED** the decision on CSC TOR document until the next meeting.

ACTION 62/01: SECAS to propose solution options for governance of Release scope and costs to the CSC at the May meeting.

9. Any other business (AOB)

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

Next Meeting: 21 May 2024