SEC
Smart Energy Code

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SEC Change Sub-Committee Meeting 63_2105

21 May 2024, 10:00 – 13:20

Teleconference

SECCSC_63_2105 – Final Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers	Emma Johnson (EJ)	British Gas
	Emslie Law (EL)	OVO
Small Suppliers	Daniel Davies (DD)	ESG Global
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
Other SEC Parties	Jeff Studholme (JS)	Smart Meter Assets
	Philip Doyle (PD)	Reverve Ltd

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	Del Kang (DK) *(Part Meeting – Agenda Item 6)*
Richard Vernon (RV) *(Part Meeting – Agenda Item 3)*		
Drax		
Paul Bedford (PB) *(Part Meeting – Agenda Item 3)*	David Gilkes (DG) *(Part Meeting – Agenda Item 3)*	Greg Williams (GW) *(Part Meeting – Agenda Item 3)*
Ofgem		
Grace Royall (GR)	Arno Vanden Eynde (AVE) *(Part Meeting – Agenda Item 6)*	
Smart Energy Code Administrator and Secretariat (SECAS)		
Rachel Black (RB) (Meeting Secretary)	Kev Duddy (KD)	Simon Grimwood (SG)

Liz Woods (EW)	Mohammedanwar Sumro (MS)	Martin Hanley (MH) (Testing Advisory Group Chair) *(Part Meeting – Agenda Item 6)*
SSE		
James Burney) *(Part Meeting – Agenda Item 3)*		

Apologies:

Representing	CSC Members	Organisation
Consumers	Caroline Farquhar (CF)	Citizens Advice

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.
Based on the discussions during Agenda Item 6, the CSC agreed this action could be closed. Status: Closed	
61/01	SECAS to find a forum to take responsibility of the TSAT tables.
A member (JS) queried why the SEC Change Team need to determine the approach for the Technical Architecture and Business Architecture Sub Committee (TABASC) on how to manage the TSAT tables. SECAS (KD) advised that TABASC will decide the changes, and the Change Board will approve them. SECAS noted that the Change Board also have the right to ignore TABASC recommendations so need to develop the governance framework to ensure the TABASC recommendations are followed. Status: Open	
61/03	SECAS to confirm who from the DCC will be presenting the Project Blue updates to the CSC going forward.
The Chair advised that this has been deferred to next month due to the large agenda this month. They advised they will ensure the DCC has chosen a representative to begin giving these updates in June. Status: Open	
61/04	DCC to send SECAS the new dates in relation to SECMP0028.

Action Reference	Action
The DCC (DW) noted there was an upcoming meeting on the technical solution on 23 May 2024. They advised future dates will depend on the outcome of discussions during Agenda Item 6. Status: Open	
62/01	SECAS to propose solution options for governance of Release scope and costs to the CSC at the May meeting.
The Chair advised this action is dependent on the outcome of the discussions during Agenda Item 6. An update will be brought to June CSC following those discussions. Status: Open	

3. SEC Modification Progression

MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

SECAS (EW) presented the CSC with a summary of MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware', recommending it progress to the Report Phase.

A member (JS) stated that reference to the three million Devices not operating in Smart Mode was misleading and should instead refer to how many of those Devices are with Suppliers that use Registered Supplier Agents (RSAs). They requested confirmation that the documentation is accurate and noted that the three million Devices quoted is a number of different problems not just incorrect firmware. Also, they added that if they are not communicating, they will not be able to have the firmware updated by any Party. The Chair advised that it has been highlighted in the Modification Report that there are several reasons Smart Meters do not communicate, and not only firmware issues. They advised that DESNZ has set up a Smart Meter Not Operating in Smart Mode (SMNOSM) meeting to establish the reasons that Smart Meters cannot communicate in Smart Mode.

Another member (EL) stated that the three million quoted is a topline figure of certain criteria, with approximately 1.7 million of them are non-enrolled SMETS1 Devices. They queried the relevance of RSAs being able to update firmware, and noted they were unaware of many incidents where Devices were unable to communicate due to firmware issues. A member (DD) again questioned how the firmware can be upgraded if the Devices are not operating in Smart Mode.

The DCC (DW) noted that it is suggested in the meeting slides that the DCC have decided to scale down the 'solution'. From a DCC perspective, the technical solution is acceptable and fits what was requested. The Chair advised that it was not the intention to suggest that the DCC had failed to resolve the problem and clarified that the entire solution was originally included allowing RSAs to distribute and activate firmware. However, the Security Sub-Committee (SSC) views are that the risk of allowing RSAs to activate firmware was unacceptable, and they were not supportive of this solution. The Chair added that the current solution is only to allow RSAs to deploy firmware on behalf of a Supplier. A member (JS) advised that the RSA can do this through the Supplier system, which provides an additional solution to the issue raised.

A member (EL) queried the context of the Proposer's comments and if there is an issue with Suppliers not updating firmware. Another member (JS) advised that MP207 should not have been progressed as a Modification Proposal, and should have remained as a Draft Proposal, and agreed with EL. They noted that this scenario is similar to when MP219 'Accessing Consumption Data on behalf of SEC

Parties' was raised and noted that the Proposer had not learned from this. The member advised there is no support for this modification, and no evidence any Party will make use of this. The member expressed concern in relation to the Proposer's comments that MP207 will likely be rejected by the Change Board, but they wish to progress it to them, and then progress to Ofgem for a final decision. The member highlighted that despite having no support, MP207 will be pushed through the stage gates for decision. The member advised they will be disappointed to see this sent back by Ofgem and presented to the CSC again. A member (EL) noted this is at the cost of industry time and effort with the Proposer suggesting in the papers that this solution would help the issue, when there is no evidence that this issue even exists. The Chair suggested that if the Authority send MP207 back it may need to be sent for an Impact Assessment.

Another member (DD) highlighted that the MP207 Modification Report reflects the industry's dissatisfaction that the Proposer has continued to progression it. The member (JS) queried if the Modification Report mentions that the Parties who wish to use an RSA to deploy firmware, can already do so via Supplier systems. SECAS (EW) advised that the Modification Report notes that it would be possible for RSAs to utilise a Supplier Party's system as meter installers currently do, but for firmware maintenance.

The member (DD) advised that MP207 does not facilitate SEC Objective (a)[1] as suggested by the Proposer and expressed confusion as to why MP207 is being pushed through the process. They noted that implementation will further complicate an already complex firmware update process by proposing to split it into two parts and stated that no Supplier will use it. A member (EL) advised that the Proposed Solution will enable RSAs to deploy firmware, but the outcomes suggested by the Proposer will not be achieved. They advised that the process should not be split into two parts, and queried what will be done when the process fails and the firmware does not uplift. The member (DD) noted this and advised that the business case that has been defined will not be solved by this solution. However, the Proposed Solution will technically do what it says it will do. They suggested the CSC has no other option but to allow this to progress to the Change Board. They also advised the other CSC members to note the final comments in the MP207 Modification Report, noting that they are insightful. Another member (JS) noted that a business case has been described but is not quantified. They queried the percentage of Smart Meters that will be saved and highlighted that this will not be used by Suppliers. A member (DD) queried if it could be proved from DCC reporting that Suppliers have difficulties managing their firmware. They added that if there are not many Suppliers with firmware version N-1, then how many will be impacted by this solution. A member (JS) noted that Suppliers will not purchase this service from an RSA, which means the three million quoted will be reduced to a fraction of the number. The Chair acknowledged the comments made, and queried how much of the CSC's time should be spent on this issue. The member (DD) agreed and suggested MP207 be progressed.

The member (EL) asked if the Proposer has the ability to determine if their modification needs to be Authority-Determined. The Chair advised that there are certain criteria that determine whether a modification is Authority-Determined. One of these relates to competition of services in relation to energy supply, which is the reasoning used for MP207.

When discussing the MP207 Progression Options, the member (DD) advised that Option 2 (CSC send MP207 back to Change Board recommending it progresses to DCC Impact Assessment) and 4 (CSC send MP207 back to the Working Group to reexamine the problem statement and solution) will

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

result in the CSC ending up in the same position. They noted Option 3 (CSC recommend that since there is already a no-cost workaround in place, MP207 is withdrawn) will have the same result. The member asked for clarification that MP207 is now an Authority-Determined Modification. The Chair confirmed MP207 is being considered as Authority-Determined. They advised that even if MP207 was presented to the Change Board as a Self-Governance Modification, the Proposer could appeal the Change Board's decision to the SEC Panel if they were dissatisfied with the decision made. They could then appeal the decision to Ofgem, meaning MP207 could end up being brought before Ofgem whether it is Authority-Determined or Self-Governance. They advised that the CSC has the power to determine if a modification should be considered Authority-Determined or Self-Governance, but there is a case to argue that MP207 should be Authority-Determined. The member expressed concern that each option will result in MP207 being presented to the CSC again as it is unlikely the Proposer will withdraw it. However, they noted Option 1 (CSC agree to progress MP207 to Report Phase with the risk that Ofgem send it back as not fully assessed) and Option 3 could be carried out simultaneously.

A member (EJ) noted the cost of the Impact Assessment (£13,127) but suggested it could move MP207 out of this loop. Another member (EL) asked if SECAS have spoken with Ofgem in relation to this. The Chair advised they have, but Ofgem did not suggest what decision they would make if MP207 was presented to them. The member (EJ) suggested the CSC recommend the Change Board progress MP207 for DCC Impact Assessment. A member (DD) expressed concerns in relation to the cost. They advised another option could be to pursue the explicit charges route if a DCC Impact Assessment is requested. The DCC (BB) queried if a modification should be raised to address exceptional circumstances a Sub-Committee can request Panel to withdraw a modification. The Chair acknowledged this but advised that similar modifications have been raised in the past, but Ofgem have not agreed with them. However, they noted this scenario is a good example of when this might be useful.

The majority of the CSC members agreed with Option 1.

The CSC:

- **AGREED** that MP207 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

MP224 'SEC Performance Assurance Framework'

SECAS (KD) presented the CSC with a summary of MP224 'SEC Performance Assurance Framework', recommending it progress to the Report Phase.

A member (JS) noted that the assurance framework and risks are associated with Suppliers and their activities. They queried what the solution to this will be, and asked if it is only to allow visibility.

Another member (EJ) queried whether this was aimed at DCC obligations originally and had changed to encompass all Parties. SECAS (KD) advised that all SEC obligations would be included, except those from Section Z and Section G. They explained that an overarching high-level risk can be highlighted, but there could be many factors contributing to this. It could be that a DCC function is not operating accordingly, or there might be issues with a Supplier process. They advised the Performance Assurance Board (PAB) will use techniques such as monitoring, producing guidance to assist the Party, and encourage better working practices. The PAB are not expected to duplicate work and therefore the DCC performance being monitored by the Operations Group (OPSG) is likely to continue. They added that the PAB can also conduct audits but highlighted that financial penalties will not be incurred. It will be up to the PAB, in consultation with industry, to determine the Performance Assurance Techniques (PATs) and to what risks they will apply. The Proposer (EL) echoed that the PAB will oversee more than the DCC, as the SEC encompasses obligations on many different Party types. They noted that the function must include all SEC Parties, and not solely focus on the DCC.

The member (JS) advised that they were supportive of MP224 and referred to the PABs of other Codes, highlighting the different levels of authority each one has. They stated that the SEC PAB must have enough authority to ensure behavioural change. The Proposer noted this, and observed there are ways of encouraging correct behaviour, and that the PAB would be responsible for delivering these PATs once the modification is approved.

The CSC:

- **AGREED** that MP224 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

MP230 'Review the SLA for delivery and completion for SMETS1 firmware'

SECAS (MS) presented the CSC with a summary of MP230 'Review the SLA for delivery and completion for SMETS1 firmware', recommending it progress to the Report Phase.

The member (JS) advised they struggled to understand the magnitude of the issue. They asked which Devices are being discussed, and what percentage of Smart Metering Equipment Technical Specifications (SMETS) 1 Devices are being impacted. The Chair advised that the Aclara Devices are impacted, but this cannot be written in the SEC. The member noted this and suggested it could be referred to as 'X amount of SMETS1 estate', and they should be able to find out the percentage of SMETS1 estate. The DCC (DW) advised the percentage was given at a previous Working Group meeting, and they can find the percentage there. The Chair advised this can also be included in the MP230 Modification Report if it is not already there. Another member (EL) observed that the Devices mentioned make up a large percentage of a certain cohort. They advised it is not just the percentage of what the DCC has in stock, but also the percentage of what certain Suppliers have. They stated that if a Party has more than the X amount, this restriction will be enforced, meaning they cannot be upgraded. The Chair acknowledged that some Suppliers are affected more than others. The member also highlighted that it is not explained how the DCC arrived at the figure of 750kB Devices. The Chair advised that TABASC decided on that figure, as anything below 750kB is below everything else. There are only some that are above 750kB, including Aclara Devices. The Chair explained that using this figure splits the larger amounts against the smaller amounts. The member noted this, and commented that they would not agree the DCC arrived at this figure, as this system has been built into by others, meaning the DCC has no choice.

The member (EJ) advised they were unaware that the DCC are working on completing larger firmware updates, but were agreeable with this activity. They also noted that the MP230 legal text that went out in the Refinement Consultation appeared to be out of date. SECAS (MS) noted this, and advised this has since been amended. The Chair advised this will be noted in the MP230 Modification Report Consultation.

A member (EL) expressed concern in relation to lack of coordination at the DCC service desk. The DCC (DW) noted this, and advised a process has been set up via Microsoft Forms to make the process easier and more efficient, but this was not set up until the beginning of this year. The member noted this.

The CSC:

- **AGREED** that MP230 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

ACTION 63/01: The CSC requested the percentage of Aclara Devices to be included in the modification report.

MP246 'DCC User access to metadata via the DCC Self-Service Interface (SSI)'

SECAS (AB) presented the CSC with a summary of MP246 'DCC User access to metadata via the DCC Self-Service Interface (SSI)', recommending it progress to the Report Phase.

The Proposer (JB) clarified that they raised MP246 on behalf of SEC Panel, and not Scottish and Southern Energy (SSE).

A member (JS) asked if there will be any Regression Testing if there are changes to the Self-Service Interface (SSI) that affect cost estimates. The DCC (DW) confirmed Regression Testing will not be carried out, as this change focusses on the DSP only. The member suggested stating this in the MP246 Modification Report to reassure Parties. The DCC advised it should be mentioned in the Impact Assessment, which SECAS refer to. SECAS (KD) advised that it states in the Impact Assessment that there will be “nil to minimal release-based regression testing”, which is included in the MP246 Modification Report.

The CSC:

- **AGREED** that MP246 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'

SECAS (MS) presented the CSC with a summary of DP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1', recommending it progress to the Report Phase.

The member (JS) expressed concerns in relation to progressing DP262, based on the views from the other sub committees. They noted that one of the reasons these Communication Hubs have not been installed is because they are not of a satisfactory level, based on the reasons highlighted. They queried the need to extend installation end dates for Communication Hubs that will have to be removed once the 4G roll out takes place. The Proposer (PB) noted this but advised that there are 130,000 of these in the industry, and they are being prevented from being returned to the DCC [due to the DCC processes]. They advised that a significant number of them could be upgraded with one Over the Air update, with no security issues. They also highlighted the environmental impact of removing these Communications Hubs, and that they are not the only Supplier in this position. The member noted the concerns raised but stated that these Communications Hubs will still be removed in a few years. Opus Energy (DG) advised that the 2G and 3G sunsetting roll out has started, but it is likely it will not finish for another nine years. Therefore, the industry could use these Communications Hubs for up to nine years. They also stated that they receive requests from the DCC to transfer excess stock, not only for these Communications Hubs but for others too. Then, if Suppliers are short of stock, Opus Energy transfers to them. They advised that if the Communications Hubs in question were made available, they could also transfer them, meaning Suppliers will not have to purchase new ones.

The member (JS) queried the necessity of installation end dates if they continue to be pushed back. The Proposer noted this and advised the previous Technical Specification Applicability Tables (TSAT) extension of three months was too short. They commented that extended end dates are simply dates set by a committee. They highlighted that the Communication Hubs should not be removed, as they are in perfect condition, and noted the environmental and commercial impacts to Suppliers. The Chair acknowledged this, and advised that MP252 'Amending the process for Communications Hub returns' has been raised to assist with the returns process to the DCC, which should make the process easier and avoid the unnecessary removal of Communications Hubs. Opus Energy (GW) advised they would like to be able to return the Communications Hubs to the DCC in order for them to be recirculated, but this is not an option at the moment. They queried if it would be sensible to not include the DCC and allow Suppliers to install the Communications Hubs. They advised this will reduce environmental impacts and transport costs and will save the DCC's time. The Chair advised that TABASC advised Suppliers could install these Communications Hubs, but they will not be counted towards their roll out targets. They advised the Proposer could present this issue to Ofgem to allow the activity to count towards installation targets.

Another member (DD) agreed there is no reason for these Communications Hubs not to be installed as they are in good condition. However, the issue is they will not count towards the roll out targets, which could be discussed with Ofgem. A member (JS) queried how many Communications Hubs were installed during the previous three-month extension. SECAS (MS) advised that 80,000 out of 200,000 were installed. The Proposer added that they attempted to return Communications Hubs to the DCC but were unable to do so. The Chair advised that SECAS are aware of this issue.

The member (JS) reiterated their concerns about progressing DP262 based on the views of TABASC and SSC, as it appears their feedback is being ignored. The Chair acknowledged these concerns but reminded them that the CSC is being asked if the issue has been completely assessed and feedback has been received from the Sub Committees concerned. A member (DD) agreed with the points raised by JS. However, they noted from a CSC perspective DP262 is ready to be progressed and for more feedback to be received from the Modification Report Consultation. They added that the feedback from this will then be considered by the Change Board when performing the final vote.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP262 should be converted to a Modification Proposal
- **AGREED** that MP262 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP269 'June 2024 SEC Release Supporting Changes'

SECAS (SG) presented the CSC with a summary of DP269 'June 2024 SEC Release Supporting Changes', recommending it progress to the Report Phase.

The member (EJ) noted the legal text has been changed to a simpler version since the meeting documentation was sent to members. They queried if it is an issue that members have not read it prior to the meeting. The Chair acknowledged this, and suggested the CSC defer their decision to the next CSC meeting, where DP269 will be presented as a Fast-Track Modification.

The Chair advised that it was sent to SECAS with draft legal text stating 'where functionality is available' however there were concerns that this effectively meant the the DCC were not required to process SMETS1 Devices in line with MHHS as stated in the SEC. Due to these concerns SECAS requested that the SECAS lawyer review the text. They advised this section should be removed. SECAS discussed this with the DCC, and it agreed.

A member (DD) noted that the next CSC meeting will take place only a week before the June 2024 SEC Release. They queried if there is an updated Modification Report to reflect the amended legal text. SECAS (SG) advised they have updated the DP269 Modification Report, but it has not been sent out.

The Chair acknowledged these comments, and proposed the CSC defer their decision until the next meeting. They advised DP269 will not require a Refinement Consultation as the changes it proposes are minor. They advised an updated Modification Report and legal text will be sent out to the CSC members so they can full assess it before it returns to the CSC as a Fast-Track Modification in June.

The CSC:

- **DEFERRED** their decision on DP269 until the next CSC meeting

4. 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.

No comments were received from the CSC.

The CSC:

- **NOTED** the new Report Phase date for the highlighted modifications.

5. Post Decision Delivery

SECAS (KD) 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

6. SEC Releases Costs Update

This Agenda Item is classified as **AMBER**, and is therefore not included in this version of the meeting minutes.

7. SEC Releases Update

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

When discussing the November 2024 SEC Release, the Chair advised that SECAS are waiting for information from the DCC on SECMP0028 to decide if it is more cost effective to include it in this SEC Release, or the June 2025 SEC Release. The Chair advised that the other modifications in the November 2024 SEC Release are text-only changes, which will not incur DCC charges.

A member (JS) asked if MP085B 'Synchronisation of Smart Meter voltage measurement periods (meters currently installed)' has been approved or is only targeted. The Chair advised that it is only targeted. SECAS (KD) added that it will be presented to the Working Group and TABASC this month.

When discussing baselining the November 2024 SEC Release, the Chair advised that 'baseline' means the CSC agree what is included should be in there, except for the question of the SECMP0028 costs. However, the CSC can decide to remove SECMP0028 at a later date if they wish.

A member (EJ) asked why MP242 'Change to Operational Metrics to Measure on Success' is planned to be implemented as an ad hoc SEC Release in November 2024, rather than with the planned SEC Release. They also asked if it would have any unknown testing costs. The Chair advised it is not a total system modification, meaning it will only affect DCC reporting functions. The DCC (DW) added that there will be no system impact or Regression Testing associated with it. In relation to why there is a different date, SECAS (SG) explained that it depends on the MP242 design phase. They advised it is estimated to be close to the November 2024 SEC Release, but they do not have an exact date. They advised it has been left as an ad hoc SEC Release for now, but it can be moved into the scope of the November 2024 SEC Release with no issues.

The CSC:

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

8. Any other business (AOB)

SECAS (KD) asked the CSC if they would agree to having either an ad hoc meeting or ex-committee decision on 6 June to decide if MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue' should progress to the Report Phase. They explained that Parties wish for MP239 to be delivered in the June 2025 SEC Release. For this to happen, a decision on the modification must be made at the June Change Board.

SECAS advised they would present the Impact Assessment to the Working Group on 5 June 2024 before asking the CSC to make a decision on 6 June 2024 on whether to progress to the Report Phase. If approved there would be a shortened 5 Working Day Modification Report Consultation to allow sufficient time to present it for Change Board vote on 26 June 2024.

The DCC (DW) advised they intend to have the Impact Assessment returned to SECAS by the end of this week. The Chair proposed that an ex-committee decision would be the best option. They advised if SECAS send out the ex-committee information on 6 June 2024, CSC members will have until 8 June 2024 to respond with their decision. SECAS (KD) added that this will depend on the Working Group agreeing with the Impact Assessment progressing.

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

Next Meeting: 18 June 2024