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SEC Change Sub-Committee Meeting 65_1607

16 July 2024, 10:00 – 11:40

Teleconference

SECCSC_65_1607 – Final Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Kev Duddy (KD)	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) *(Part Meeting – Agenda Items 5 to 8)*	Reverve Ltd
Consumers	Faye Brookes-Lewis (FBL)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	Del Kang (DK)
Pete McEnerney (PMcE)		
Citizens Advice		
Colin Griffiths (CG)		
Ofgem		
Grace Royall (GR)		
Smart Energy Code Administrator and Secretariat (SECAS)		
Rachel Black (RB) (Meeting Secretary)	Khaleda Hussain (KH)	Simon Grimwood (SG)
Mohammedanwar Sumro (MS)	Georgie Severin (GS)	Ben Giblin (BG)

Drax		
Paul Bedford (PB) *(Part Meeting – Discussion on MP262)*	Dave Gilkes (DG) *(Part Meeting – Discussion on MP262)*	

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.

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
61/01	SECAS to find a forum to take responsibility of the TSAT tables.
The Chair advised that SECAS are investigating a potential project to assess the purpose and function of the Technical Specification Applicability Tables (TSAT). 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 that SECAS are discussing this with the Testing Advisory Group (TAG) and SEC Panel Chairs. Status: Open	
64/01	The DCC (DK) to investigate the downsizing of the Regression Testing scope which should reduce costs for the November 2024 SEC Release and report back to the CSC.
The Chair advised the next update on this will be provided at the November CSC meeting. Status: Open	
64/02	The CSC to monitor the length of time it takes DCC to raise Purchase Orders.
The Chair confirmed that the CSC will continue to monitor this. Status: Closed	

3. SEC Modification Progression

MP248 'Requirements for DCC Gateway Connection'

SEC Smart Energy Code

SECAS (MS) presented the CSC with a summary of [MP248 'Requirements for DCC Gateway Connection'](), recommending it progress to the Report Phase

The member (EL) suggested making a minor text change to provide clarity around a User CIO Assessment taking place. SECAS (MS) agreed with this.

The CSC:

- **AGREED** that MP248 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

MP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'

SECAS (MS) presented the CSC with a summary of MP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1', recommending it progress to the Report Phase

The member (JS) observed that if a Communications Hubs is installed and upgraded as part of the installation process, it could still be a compliant version on the date it is installed. The Chair agreed with this, and added that it has to be updated on the day it is installed.

A member (EJ) agreed that MP262 does not need to go out for consultation before being brought back to Change Board, as the Change Board only required clarification on some points. However, the member questioned if a second consultation on MP262 would need to take place for governance reasons. The Chair agreed with the points made and noted that the issues were only raised by the Change Board, and not in any other forum. As the modification has a Modification Report Consultation already it has met the governance criteria, and therefore could return to the Change Board without another consultation if the CSC approve it today.

The member (JS) suggested that the real benefit of MP262 is that it is linked to commercial issues of returning Communications Hubs. They advised it is misleading to state that it allows Suppliers to carry out compliant installations, as it implies that they are uncompliant without this. They stated that the benefit of MP262 relates to the management of Communications Hubs and the costs associated with installation, and is not focused on allowing compliance. The Chair acknowledged this, and advised it was stated at a recent Technical Architecture and Business Architecture Sub Committee (TABASC) meeting that there is nothing stopping Suppliers from installing and upgrading Communications Hubs. However, the issue is whether they will count towards Suppliers' roll out targets.

The Proposer highlighted that this has been discussed at length at Change Board, and the questions that came from the discussion have now been answered. Therefore, they agreed MP262 should be progressed. A member (DD) agreed with this. Another member (EJ) asked if this would be brought to next week's Change Board meeting. The Chair confirmed this.

A member (JS) asked if the Change Board will be made aware that though MP262 has been agreed to progress to Change Board to final vote, the CSC and TABASC are not fully supportive of it. The member highlighted that they agree MP262 should progress as they cannot see another next step for it, but added that they do not support MP262. The Chair advised that the Change Board will be made aware of the sub committees' views. They added that the responses to the Modification Report Consultation had mixed views, which generated a lot of discussion at Change Board.

The CSC:

- **AGREED** that MP262 should be progressed to the Report Phase

- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

DP270 'Enabling DCC to provide SMDA Test House services'

SECAS (GS) presented the CSC with a summary of DP270 'Enabling DCC to provide SMDA Test House services', recommending it progress to the Report Phase

The member (JS) asked if the Smart Meter Device Assurance Sub-Committee (SMDASC) has given any insight into whether there is a lack of competition tending for SMDA test services. SECAS (GS) advised they were unsure if such concerns had been raised. The member highlighted that there are several Parties lined up to provide this function, and asked why the CSC need to be concerned if the DCC are allowed to carry out this function. The Chair advised that the SMDA tender pack has not gone out yet. However, the DCC have advised they wish to bid for it. They advised SECAS will present DP270 to the SMDASC to gain feedback during the consultation process. The Proposer (BB) agreed with the Chair and advised that this has been raised following the implementation of MP264 'Updating Independence of SMDA Testing Provisions'. They advised that MP264 enables the DCC or their Service Provider to bid for the SMDA Testing Service. DP270 has been raised to ensure that the DCC are still operating within their licence agreement if they bid for and are awarded the SMDA Testing Service. The Chair explained that DP270 focuses on DCC compliance, whereas MP264 focuses on opening the services to all SEC Parties.

The member (EJ) queried if DP270 also supports SEC Objective (b)[1].

A member (JS) noted this will have an issue and impact on the DCC, but advised this is not an issue or impact on the wider industry. Another member (DD) suggested DP270 facilitates SEC Objective (d)[2]. A member (EJ) stated this is an issue that helps Parties. The Chair agreed with this and advised that the impact on other Parties is by preventing the DCC from bidding, they may not get the best value for money at the end of the process. The Proposer (BB) stated that the reason DP270 was raised was in the instance the DCC are awarded the SMDA service tender they can provide the service, as the current DCC licence and the SEC would not allow them to do this.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP270 should be converted to a Modification Proposal
- **AGREED** that MP270 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

[1] Enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence.
[2] Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

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.

The Chair advised that not enough information has been provided yet that warrants raising as Draft Proposals.

The member (EJ) expressed concern regarding the 'Anticipated Modifications', as CSC members have no visibility as to what they are and how they are being progressed or managed. They noted that only one new Draft Proposal has been raised since February. They questioned whether increased scrutiny on anticipated modifications had begun since the Modifications Improvement Project concluded. They noted that SEC Section D states that when Draft Proposal is raised to SECAS, SEC Parties are to be made aware of it promptly. The Chair acknowledged the concerns raised and advised that SECAS had historically been raising Draft Proposals very quickly after being raised by Parties. They added that this led to many Draft Proposals not progressing as the issue and business case were not clearly defined. To resolve this the SEC Issues Group was created to triage issues before they are raised as a Draft Proposal. As a result, the Chair acknowledged some transparency may have been lost as Parties are seeing less Draft Proposals being raised. A member (JS) highlighted that the meeting minutes from the SEC Issues Group are available on the SECAS website, but noted the point raised by EJ was an unintended consequence of the new process. The member queried how an issue can be escalated if a Proposer felt they could not get their issue raised as a Draft Proposal. The member (EJ) noted that SEC Section D states that any Party can raise a Draft Proposal and that it be logged promptly. However, they agreed that the process should not be misused. The member (JS) stated that some Parties were raising Draft Proposals when they were actually problem statements that could be solved outside of the SEC process. The member (EJ) noted this but stated that the CSC should have more awareness of what takes place at the SEC Issues Group. The Chair acknowledged the concerns raised and advised that Anticipated Modifications and issues are the same, which has caused confusion. In future, the Chair noted that SECAS will present a list of the issues which are being assessed and reasons provided as to why they have not been raised as Draft Proposals. They explained that for some of the issues, the Proposer has been given feedback to work on, whilst others are housekeeping changes from the Security Sub-Committee (SSC) and Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA). The Chair advised they will ensure there is more transparency for the CSC going forward. They added that SECAS are investigating how they can log issues on the website for wider consideration and discussion and an action has been raised at the Operations Group (OPSG) in relation to this.

SECAS (BG) provided an overview of MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter', noting that Ofgem had provided a statement on the applicability of the proposed solution. Ofgem (GR) asked for confirmation that the Ofgem statement would be included in the minutes of the meeting. SECAS (BG) confirmed this.

The statement from Ofgem:

"Whilst Ofgem is unable to provide an opinion on an Authority Determined modification until it is sent to us for decision, our initial concerns regarding SECMP169 related to the meter's ability to effectively communicate therefore inhibiting its smart functionality. However, on review of the Allowed SRV List we are comfortable that the meter, as proposed in the current modification, is still operational and is able to communicate with the DCC. Suppliers must take steps to ensure that all smart meters are compliant with electricity supply licence condition 48 and gas supply licence condition 43 – Operational Requirements".

SEC
Smart Energy Code

SECAS (BG) informed the CSC that SECAS were recommending that the timetable for MP085B 'Synchronisation of Smart Meter voltage measurement periods (meters currently installed)' be extended for one month. A member (JS) noted the information provided by SECAS and commented that the modification had received negative feedback from Parties during the Working Group. Another member (EJ) asked if there is a negative impact by leaving MP085B on hold indefinitely. SECAS (BG) advised there is no impact but highlighted the modification has been open for a long time, noting that last year SECAS gave the Proposer six months to build a business case for MP085B, but no work was completed. As such, SECAS are reluctant to extend the timeline again, as it appears there is no more information that can be gathered to build the business case. The member (JS) noted that although the CSC has no authority in this scenario, this statement will set a precedent that modifications cannot be left without progression for such extended periods of time. They advised there is lots of discussion when MP085B was presented to the Working Group and the modification should proceed to the Report Phase in order to have a final consultation. Another member (EL) suggested that MP085B has reached a dead end, as the issue raised does not justify the cost it will have on the industry. The member (JS) noted this, but observed that the issue has not been quantified, as it needs to be raised with the Meter Manufacturers who are impacted by this. They advised that the SEC Modification route is not the only way to solve this issue, but it is still unclear how many meter manufacturers are affected by this. The member (EL) commented that not everyone is impacted by this equally. They advised this is an example of an issue facing one Party who wants to find a solution but cannot quantify the issue. The member (JS) noted the complexity of the issue as the modification had already been split into two separate modification proposals. The Chair estimated that the percentage of Devices affected by this is 40%, but advised they are focusing on the governance of how MP085B can be progressed to a decision rather than remaining open.

The CSC:

- **NOTED** the updates on the SEC Modification Timetables

ACTION 65/01: SECAS to present detail on all active issues that had been raised with SECAS within the CSC meetings.

5. Post Decision Delivery

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

The member (EJ) queried why the go-live date for MP176 'Customer Analytics Reporting' is to be confirmed, as they thought it was meant to be implemented by the end of the year. SECAS (KH) advised that it will depend on who it is contracted to, which has not been confirmed yet. The Chair added that the legal text has a sunrise clause, meaning it will go live on 31 December 2024, but advised they will have a more accurate estimate next month.

The member (JS) suggested it would be beneficial to note what go live date was originally agreed to see if there is any change in the future. They also suggested SECAS present a post decision delivery benefit realisation, to build the evidence that the modifications have a good business case. The Chair advised that SECAS are looking into this, and will consider adding this to the Terms of Reference, which is due to be updated once there is an agreement on the SEC Releases process and costs.

The CSC:

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

6. SEC Releases Update

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

The member (EJ) queried why MP241 'Interoperability Checker Update' was included in the November 2025 SEC Release, as they thought it had missed that SEC Release. The Chair explained that it had missed the June 2025 SEC Release, and has now been targeted for the November 2025 SEC Release.

The member (JS) asked if there are other modifications waiting on the outcome of MP219 'Accessing Consumption Data on behalf of SEC Parties' before being progressed. The Chair advised that the Proposer has raised MP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC', and they are waiting on the outcome of MP219 before considering their next steps. They noted the Proposer also raised MP235 'Enhanced Meter Data Access for Other Users', but this is separate enough that it is not dependant on the outcome of MP219.

Ofgem (GR) highlighted that they are working on the modifications that have been sent to Ofgem for decision, but it will take longer than usual to give their response due to the general election.

The CSC:

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

7. Project Blue Update

The DCC (DK) presented an update on the DCC's new Project Blue.

The member (EJ) queried whether the Retail Energy Code (REC) Releases are affected by the switching part of services, or do REC Releases impact the SEC side of the DCC. The DCC (DK) advised that REC Release switching is in scope, of the project and that the DCC manage the REC end-to-end changes, similar to the SEC. They advised that the methodology is different, and the DCC need to investigate whether managing these different processes can be done in a more efficient way. The member asked if Project Blue is linked with the DCC's work on regression testing. The DCC confirmed these are two separate issues.

A member (JS) noted that DP218 'Review of the SEC Charging Methodology' also raised questions regarding transactional charges, and there has been no further progress on it. They advised that the information regarding Project Blue is interesting, but the CSC are more concerned about regression testing and how it is best optimised. The DCC (DK) acknowledged this, and advised that the issue was escalated last month. They stated that a meeting took place with the DCC and SECAS on 15 July, and it was agreed that an estimate of total costs needs to be provided for SEC Releases in the future. They added that they have provided the estimated cost for the June 2025 SEC Release, which is £1.4 million end-to-end. The DCC advised there is a project underway to understand the post Pre-Integration Testing (PIT) costs. They explained that the regression testing costs are smaller than the cost of the post PIT testing. They advised they will look at every testing phase and see if this needs to be done for every modification that is going live. The Chair asked if the £1.4 million is based on the current scope of regression testing. The DCC (PMcE) confirmed this and advised that in the meeting on 15 July they looked at the historic costs, the difference between modification approval amounts, and the reasons behind the end-to-end costs. They advised they will present this in more detail at the next meeting.

The CSC:

- **NOTED** the update provided by the DCC

ACTION 65/02: The DCC to present analysis of the regression testing costs at the next CSC meeting.

8. Any other business (AOB)

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

Next Meeting: 20 August 2024