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SEC Change Sub-Committee Meeting 64_1806

18 June 2024, 10:00 – 11:35

Teleconference

SECCSC_64_1806 – Draft 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

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	Del Kang (DK) <i>(Part Meeting – Agenda Item 3)</i>
Smart Energy Code Administrator and Secretariat (SECAS)		
Rachel Black (RB) (Meeting Secretary)	Kev Duddy (KD)	Simon Grimwood (SG)
Utilita		
Kevin Clark <i>(Part Meeting – Agenda Item 3)</i>		

Apologies:

Representing	CSC Members	Organisation
Consumers	Colin Griffiths (CG)	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
61/01	SECAS to find a forum to take responsibility of the TSAT tables. SECAS (KD) confirmed that the forum to take responsibility of the Technical Specification Applicability Tables (TSAT) will be the Technical Architecture and Business Architecture Sub Committee (TABASC). However, based on discussions at the June TABASC meeting, more investigation is needed before TABASC take on this responsibility. Status: Open
61/03	SECAS to confirm who from the DCC will be presenting the Project Blue updates to the CSC going forward. The DCC (DK) will be presenting the Project Blue updates from July onwards. Status: Closed
61/04	DCC to send SECAS the new dates in relation to SECMP0028. It was confirmed that SECMP0028 'Prioritising System Messages' will be implemented in the November 2024 SEC Release. The DCC will take the recommended details of the configuration of SECMP0028 to TABASC on 4 July 2024. Status: Closed
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 the DCC are to present an update on this at the July CSC meeting. Status: Open
63/01	The CSC requested the percentage of Aclara Devices to be included in the modification report. The detail has been included in the MP230 Modification Report, which is available on the SECAS website. Status: Closed

3. SEC Releases Costs Update

The DCC (DK) presented the CSC with an update on the SEC Releases Costs.

A member (EL) asked why Ofgem would need to formalise the cancellation of the November 2024 SEC Release. The Chair advised that if the CSC recommended to move the SEC Release of [SECMP0028 'Prioritising System Messages'](#) from November 2024 to June 2025, the Panel Chair would have to write to Ofgem and ask them to move the implementation date, which is outlined in the SEC. The Chair noted that the CSC is the delegated subcommittee of the SEC Panel, and therefore the CSC would have to make the recommendation to the SEC Panel.

The member asked what the operational risk of moving the SEC Release is. The DCC (DK) advised that they are currently holding a risk to processing of prepayment top ups in high traffic scenarios that they are trying to remove by implementing SECMP0028. The member commented that this indicates the DCC has had this risk since the system went live. The DCC (DK) agreed with this.

The member noted that the approved costs of the modification were drastically different due to the implementation costs from the regression testing. The Chair advised this will be dealt with as a separate item as it will apply to every modification and SEC Release. SECAS will work with the DCC to understand how this could be dealt with going forward. However, they advised that the implementation of SECMP0028 will require a more immediate decision. The member reiterated there had been no governance process around the approval of the additional costs to be spent. The Chair advised this is part of a bigger piece on SEC Releases and testing costs which is under investigation.

A member (JS) asked if these issues have been raised with the Proposer. They noted that moving SECMP0028 to the June 2025 SEC Release means the winter period will be missed, where top ups and impact from failure would be far greater. The Proposer (KC) advised they considered that SECMP0028 was critical to ensure continuity through uncertain periods of service.

The member (JS) queried whether the system was stable enough to consider reduced scope of regression testing, noting Communications Services Provider (CSPs) should not be impacted by the changes. They advised the option of implementing and rolling back should be looked into and noted it could be cheaper than regression testing. They highlighted that regression testing should be scoped appropriately. The DCC (DK) advised they will investigate if their scope of regression testing is still appropriate and considered the DCC are very risk averse. They advised they will work with the DCC Test Assurance team to understand what the regression test scope now looks like, given the functionality the DCC are now delivering. They added that if this means this Data Service Provider (DSP) change does not need CSP testing, they will proceed with that. The Chair asked if this work will be complete for this SEC Release or will be a wider piece of work on SEC Releases.

A member (EL) commented that no assets are at risk of being stranded as part of SECMP0028, noting it was raised to handle the sending of Service Request Variants (SRVs) when there is a problem in the DCC System.

The DCC (DK) advised that the regression testing for delivering the November 2024 SEC Release will be financially different than previous SEC Releases, confirming that the projected saving of £0.9 million is based on historical figures. The DCC advised they have discussed the scope with their Service Providers but not the detailed costs. The Chair noted this, and advised they are in discussions with the Chairs of SEC Panel, TAG, and TABASC to decide how this issue be taken forward.

A member (EJ) noted that SECMP0028 is one of the oldest modifications but seemed to have increased in importance in the last year and is the topic of wider industry discussion. They observed that it is still uncertain how much will be saved if SECMP0028 is delayed. They also queried if the maintenance release for [MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'](#) will be impacted by a cancellation of the November 2024 SEC Release. The DCC

(DW) advised it will not be impacted, as they are totally separate. They advised that that part of SECMP0028 will require regression testing and moving it to June 2025 SEC Release would generate savings as the costs can be shared amongst three modifications that are targeted for June 2025.

A member (EL) stated that if the CSC are to make a recommendation to the SEC Panel to move the November 24 SEC Release, they will need to outline why and have the evidence to prove it, which has been difficult to provide previously. They highlighted that the letter would need to include reasons why the CSC agree or disagree with deferring the implementation. Another member (JS) agreed with this, but also queried if the CSC would have signed off on previous SEC Releases if they had been aware of the regression testing costs. They also commented it is difficult to decide when it is uncertain what the saving will be. They noted that the CSC do not have all the information required but accepted that delaying a decision would result in increased regret spend.

The DCC (DK) advised there is a high probability they can reduce the costs of regression testing by reducing the scope. The Chair noted this, but advised it is not certain how much it will be reduced by. A member (JS) asked if there is a possibility that any more modifications can be added to the November 2024 SEC Release. The Chair advised this is not possible, as it takes six months of design, build, and Pre-Integration Testing (PIT) for system changes, and six months of System Integration Testing (SIT) and User Integration Testing (UIT).

A member (EJ) asked if there is a date between November 2024 and June 2025 that might not lead to such a delay. They noted the difficulty of not knowing how much it could be reduced by but assumed it cannot be a lot as it would have been noticed in previous years. They also noted that November is the beginning of the winter period so any delay may affect consumers.

The DCC (DK) advised they have not looked into their regression testing scope in recent times, and cannot determine it is valid. However, they observed there have been eight SEC Releases, and the technology now should be more stable than it was at the first SEC Release. Therefore, less testing should need to be done to prove nothing has been broken during the code change. As a result, the DCC (DK) advised they are confident they will be able to reduce the cost.

Utilita (KC) asked if there is a figure available for the regret spend that will be lost by delaying SECMP0028. The DCC (DK) advised that it will be approximately £280,000 by 28 August but would be larger if a decision to defer is received after this date. The Chair noted this, and advised this assumes Ofgem can make the decision by 28 August. They reminded the CSC of Ofgem's moratorium on decision making because of the General Election, and advised they are unsure how long it will take them to make a decision after this.

The Chair acknowledged the concerns raised, and proposed the CSC have three options available to them:

1. The CSC agree to delay SECMP0028 until the June 2025 SEC Release noting there is a risk for prepayment consumers but would incur reduced costs for regression testing.
2. The CSC agree for SECMP0028 to remain in the November 2024 SEC Release, noting a worst-case scenario regression testing would cost £1.2 million, with DCC trying but with no guarantees to reduce scope and therefore cost.
3. The CSC advise they need more information from the Proposer and the DCC about the risk level, and defer their decision until then, understanding the longer the delay the more regret costs will be incurred.

The member (EJ) agreed with Option 1.

The member (EL) agreed with Option 3, as the increased cost was not included when SECMP0028 was approved, and they would like more information on the scale of the benefit. The Chair noted this, but advised the cost will increase the longer it is delayed.

The member (DD) advised that the problem with the risk of delay is that it is ongoing. They stated that had this not been discovered, they would have been oblivious to the issue and gone through with the SECMP0028 cost. Therefore, they agreed with Option 2.

The member (KK) agreed with Option 3.

The member (JS) agreed with Option 2, but advised they would be agreeable to Option 3 if the majority agree to it. They queried how long the decision can realistically be delayed, and advised something will have to be set up offline. They added that if it is delayed, the CSC need to agree how long it can be delayed for.

The member (EJ) asked how long it would take to get the required information. The DCC (DK) advised they were unsure, but the fact they have not managed to obtain this information before indicates it will be difficult. They advised that work would need to be scoped and commercial terms agreed, acknowledging it would take time as there is a process they need to follow. They advised they will probably not have this information for at least two months.

The Chair noted that members EL and KK stated they would like more information, but this information will not be provided within the next month. Therefore, they asked if either member would like to choose one of the other options. The member (EL) noted that the cost would have been paid anyway. They advised they were inclined to agree for SECMP0028 to continue as planned but stated that work needs to be done to understand if the cost is justified. The member (KK) agreed with this. Another member (JS) advised the benefit needs to be proven on all modifications, not just this one.

The Chair advised that the majority of the CSC agreed to go ahead with the November 2024 SEC Release as planned with the DCC (DK) agreeing to investigate scope reduction for regression testing. The member (EL) asked that the DCC to report back what reduction in regression testing costs was achieved and what was removed to allow that reduction.

Another member (DD) noted that if there were other modifications put in this SEC Release, it might not have been such a big issue. They added if it had already been scheduled for the June 2025 SEC Release, it would have been less of an issue.

The Chair advised the same issue should not occur for the June 2025 SEC Release, as the CSC is aware of the regression testing issue now. They stated that regression testing will be under review going forward to ensure this situation does not occur again.

The Chair noted that EJ had voted to delay the Release. The member (EJ) agreed, but advised they were happy with the outcome. The member (EJ) asked if the Change Board will be provided with an update on the issue. The Chair advised the Change Board will be updated at the next meeting on 26 June.

The CSC:

- **AGREED** to recommend to Panel that [SECMP0028 'Prioritising System Messages'](#) be delivered as part of the November 2024 SEC Release as planned.

ACTION 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.

4. SEC Modification Progression

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 as a Fast-Track Modification.

Based on the previous agenda item, a member (JS) suggested that expected regression testing costs for modifications going forward be presented. The Chair agreed but noted that this modification was text changes only so did not incur any regression testing costs.

The member asked why DP269 cannot be included in the November 2024 SEC Release. The Chair advised that this modification needs to align with [MP256 'SEC Alignment with DCC SMETS1 MHHS Capacity Requirements'](#), which will be implemented in the June 2024 SEC Release.

The CSC:

- **AGREED** the issue and impact as clearly defined and understood
- **AGREED** that DP269 should be converted to a Modification Proposal
- **AGREED** that MP269 should be progressed and approved as a Fast-Track Modification
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

There will now be 15 Working Days for any SEC Party who wishes to object the CSC's decision. This referral period will close at 5pm on Wednesday 10 July 2024. If no objections are received, the decision will be final.

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.

The DCC (DW) highlighted that [MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#) has moved from the June 2025 SEC Release to the June 2026 SEC Release.

The member (JS) queried whether there was any overlap between [MP252 'Amending the process for Communications Hub returns'](#) and [DP197 'Reallocating Third Party Communications Hubs in the Event of a SoLR'](#). The Chair advised that the issue and solution was different, as MP252 focuses on sending Communications Hubs back to the DCC. In relation to, the Chair advised that they are in discussions with the SECAS lawyers to investigate if DP197 can be withdrawn.

The member raised concern that [MP241 'Interoperability Checker Update'](#) was returned over its Service Level Agreement. The Chair advised there is an ongoing issue where the DCC are slow to raise Purchase Orders. They advised that SECAS are questioning this and hope to resolve the issue soon but suggested that the CSC should monitor the issue. They confirmed that the information is also relayed to the Panel.

The CSC:

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

ACTION 64/02: The CSC to monitor the length of time it takes DCC to raise Purchase Orders.

6. 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

7. SEC Releases Update

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

The DCC (DW) advised there is effectively no regression testing outside of the DSP for MP256 and MP269. A member (EL) advised the DSP had stated they were impacted by this. The Chair advised that regression testing is part of the DSP, and asked if it has been included in the price provided. The DCC (DW) confirmed it was included.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper
- **BASELINED** the June 2025 SEC Release

8. Approval to implement the June 2024 SEC Release

SECAS (SG) presented an update on the June 2024 SEC Release.

The Chair advised this will be presented back to the TAG on 26 June 2024 before the SEC Release takes place. They advised the CSC are to decide whether it goes live or not, but the TAG decision will not be finalised until the day before the SEC Release. Therefore, the CSC is being asked to approve the setting live of the June 2024 SEC Release on the assumption that TAG does not raise any concerns. However, if any concerns are raised, SECAS will contact the CSC members immediately, and an ex-committee decision can be made if necessary. SECAS (SG) advised they have been in contact with TAG, and everything seems to be progressing accordingly.

The CSC:

- **AGREED** that the June 2024 SEC Release can be set live on 27 June 2024, on the condition that TAG expresses no concerns once the verbal update is given on 26 June

9. Any other business (AOB)

SECAS (RB) advised that the Annual SEC Party Engagement Day will take place on 17 July 2024, and if they are interested in attending to email secas@gemserv.com by 25 June 2024.

A member (EJ) noted that during the second half of last year there were on average three or four new modifications presented to the CSC each month. However, they observed there seems to be less this year. They also stated that there is no option to raise a New Draft Proposal on the new website, only to raise an issue. The Chair advised that the modifications are being investigated more before they are being raised, as a result of the outcome of the Modifications Improvement Project. They advised this is to ensure they have an adequate business case before raising a Draft Proposal. SECAS (KD) also noted that there has been a drop off in number of new issues being raised. A member (JS) asked if SECAS are asked to forecast modifications. They acknowledged the work being done, but advised the bar should not be raised to a level where Parties are reluctant to raise modifications. They advised that as time goes on, modifications should be more focused on the industry and environment. They noted it would be interesting to understand how many modifications should be expected. The Chair advised that it is difficult to forecast what will be raised. However, they stated there tends to be a peak in November. They advised the type of modifications that are raised are difficult to predict. The member noted this and commented that the new Issues Group at the end of Working Group meetings is an effective forum to address issues before they are raised as modifications.

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

Next Meeting: 16 July 2024