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SEC Change Sub-Committee Meeting 66_2008

20 August 2024, 10:00 – 12:40

Teleconference

SECCSC_66_2008 – 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
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
Other SEC Parties	Philip Doyle (PD)	Reverve Ltd
Consumers	Faye Brookes-Lewis (FBL)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	Pete McEnerney (PMcE)
Anita O'Grady (AOG)	Robin Seaby (RS) *(Part Meeting – Discussion of MP241)*	
Citizens Advice		
Colin Griffiths (CG)		
Ofgem		
Ian Chalfon (IC)		
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)
Chris Jackson (CJ)	Will Marshall (WM)	
Drax (MP262 Proposer and Small Supplier)		
Paul Bedford (PB) *(Part Meeting – Agenda Item 3)*		

Apologies:

Representing	CSC Members	Organisation
Small Suppliers	Daniel Davies	ESG Global
Other SEC Parties	Jeff Studholme	Smart Meter Assets

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the 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 (WM) advised that the Technical Architecture and Business Architecture Sub Committee (TABASC) were responsible for this. The Chair acknowledged this and advised that there are additional issues they need to deal with before closing this action. SECAS (WM) noted this and highlighted that TABASC discuss any proposed amendments and have guidance notes that will be presented at the next TABASC meeting. Status: Open	
62/01	SECAS to propose solution options for governance of Release scope and costs to the CSC at the May meeting.
Based on the discussions during Agenda Item 8, the Chair advised this action will remain open. However, they noted that the DCC (PMcE) suggested that some of this information will be available in Impact Assessments going forward. The Chair proposed this action remains open and the CSC can monitor its progression. The DCC (DW) advised that clarity is needed on whether it is included in the Impact Assessment, or something that is done alongside the Impact Assessment. Otherwise, it will not meet the 40-day Service Level Agreement (SLA). The DCC (PMcE) advised that this work will be complete alongside the Impact Assessment. A member (EJ) asked if there are any modifications that have had an Impact Assessment that do not have this included, and what would happen if the assumptions made during the Impact Assessment change before the modification reaches the Report Phase. They highlighted it must be ensured that the latest information is available when it reaches the Report Phase. The DCC (DW) stated that the issue is that each modification’s Impact Assessment is meant to be a standalone item, and questioned what will happen if things are added in or taken out. They advised more work needs to be done on this. Status: Open	
64/01	The DCC (PMcE) 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.

Action Reference	Action
The DCC (PMcE) advised that they can aim to provide information on this before the November 2024 deadline. They advised they have confirmation of the reduced costs for the November 2024 SEC Release but want to include work on what has been done for the June 2025 SEC Release before presenting the information to the CSC. Status: Open	
65/01	SECAS to present detail on all active issues that had been raised with SECAS within the CSC meetings.
The Chair advised that SECAS will present this during the SEC Modifications Timetables update at each CSC meeting. Status: Closed	
65/02	The DCC to present analysis of the regression testing costs at the next CSC meeting.
During the discussions of Agenda Item 8, the DCC (PMcE) presented their findings to the CSC. The Chair proposed that this action is now closed. Status: Closed	

3. Change Board referral

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'.

The member (EJ) asked for clarification on what the outcome of either decision made by the CSC will be. The Chair advised that if the CSC agree to uphold the Change Board decision, then MP262 will remain rejected. There will then be a 10 Working Day referral period for the decision to be appealed to Ofgem. However, if the CSC agree to overturn the Change Board decision, MP262 will instead be approved, and (after the 10 Working Day referral window) it will then be implemented (assuming there are no referrals to Ofgem). The member expressed concern of the possibility of the CSC making a decision that could override that of the Change Board, noting that the Change Board is normally the final decision maker of Self Governance modifications. The Chair agreed and highlighted that this is the first time this governance route has been used since the SEC Panel delegated its powers to the CSC to make such decisions. Before this, appeals were presented to the SEC Panel for decision.

Another member (EL) noted that the majority of Change Board members voted to reject MP262 based on TABASC recommendations, which have not changed. The Chair noted this and suggested the CSC members make their decision based on the information provided in the Modification Report. They added that the TABASC views and Change Board discussion have also been included in the Modification Report, which should assist members in coming to their decision.

SECAS (CJ) stated that MP262 has not formally been presented to the Testing Advisory Group (TAG). However, they noted that from a testing perspective, Great Britain Companion Specification (GBCS) Devices cannot be tested against 4G Communications Hubs. They also stated that there is no assurance of this being possible in the future.

The member (EJ) asked if Ofgem should be made aware that British Gas were the Large Supplier who changed their Modification Report Consultation response. The Chair advised they will query this with Ofgem but noted that this has been highlighted in previous meeting minutes and the MP262 Conclusions Report.

The Proposer (PB) highlighted that four similar Modification Proposals have been approved. They also stated that the majority of the Change Board voted to reject MP262, but the three Small Supplier representatives and a Large Supplier voted to approve MP262. Therefore, they believed there is a need for MP262. The Chair noted this, but advised that when [MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date'] was approved, TABASC recommended there could be a three-month extension, but no longer. The Proposer agreed but advised that the previous Modification Proposals had longer extensions and were still approved. The Chair advised that this was due to the COVID-19 regulations at the time, and the longer extensions were given as Meter Installers could not enter properties at the time. However, there has been a long period of time where Meter Installers have been able to enter properties since then, meaning there is no reason for stock to be left. The Proposer added that another issue was that Suppliers cannot reflash any devices in bulk, and a separate Modification Proposal has been raised to address both issues.

The member (EJ) expressed sympathy for the issue facing Small Suppliers, but advised there are valid reasons to reject MP262. They noted that it is not an option to return to the Change Board to provide more clarity on their decision and suggested it would be beneficial for the CSC to uphold the Change Board decision to give MP262 the opportunity to be appealed to Ofgem. Another member (EL) agreed with the points raised. They stated that the input from SECAS (CJ) highlights that moving the installation end dates will not resolve the issue and may lead to further issues in the future.

The Proposer noted the comments raised. They reiterated that four similar Modification Proposals were raised to extend end dates for longer periods of time, meaning there is a precedent for this. They advised that another extension was suggested as the previous three-month extension was too short. They noted that there is not long left on this extension, but believe it will still be sufficient, and added that there is support for this from the Small Suppliers.

The member (PD) asked what criteria the CSC members should base their decision on, and what criteria Ofgem will base their decision on if it is presented to them. The Chair advised they are unsure what criteria Ofgem will use. However, in relation to the CSC, the Chair advised that members should consider if MP262 will better facilitate SEC Objective (a)[1]. They suggested that the CSC members refer to SEC Objectives, the Change Board decision, and the arguments put forward by the Proposer. The Chair stated that the Technical Specification Applicability Tables (TSATs) were meant to be set and unchanging, but exceptional circumstances created by social distancing regulations meant that they were extended. However, there is no reason to extend them now. They reminded the members that if they decide to uphold the Change Board decision, MP262 will be rejected, but the Proposer can appeal it to Ofgem. If the CSC members vote to overturn the Change Board decision, MP262 will be considered approved and be implemented, with the agreed extension dates. They advised there will still be a 10 Working Day referral window period for the CSC's decision to be appealed, and any referrals will go to Ofgem.

The CSC:

- Agreed to **UPHOLD** the Change Board's decision to reject MP262

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

While making their decision, the CSC members stated they did not believe MP262 better facilitates SEC Objective (a). One member (EJ) noted that it negatively impacts SEC Objective (c)[2]. Another member (EL) noted that the main reason for the creation of TSATs was to drive change, and not keep Devices on walls when they should be removed.

There will now be 10 Working Days for any SEC Party who wishes to refer the CSC's decision to Ofgem. This referral period will close at **5pm on Wednesday 4 September 2024.** If no referrals are received, the decision will be final.

ACTION 66/01: SECAS to investigate if decisions referred from the Change Board should be referred to the SEC Panel instead of the CSC.

4. SEC Modification Progression

MP241 'Interoperability Checker Update'

SECAS (MS) presented the CSC with a summary of MP241 'Interoperability Checker Update', recommending it progress to the Report Phase

The Proposer (RS) highlighted that irrespective of policy data which indicates if a smart meter is operating in Smart Mode, what they are proposing will inform the consumer if their smart meter is working based on Service Requests being processed. They will then be able to see it in the service audit trail.

The Chair asked if the target release date is June 2025. SECAS (MS) advised that it will now be an Ad Hoc SEC Release.

The CSC:

- **AGREED** that MP241 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

MP263 'Improving transparency of DCC indicative costs'

SECAS (MS) presented the CSC with a summary of MP263 'Improving transparency of DCC indicative costs', recommending it progress to the Report Phase

No comments were received from the CSC members.

The CSC:

- **AGREED** that MP263 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

[2] Facilitate energy consumers management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

DP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'

SECAS (BG) presented the CSC with a summary of DP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents', recommending it progress to the Refinement Process.

The member (EL) asked which SEC Parties the cost savings associated with DP271 will apply to, noting the Proposer's organisation does not pay DCC charges SECAS (BG) advised that cost savings will apply to the SEC Parties pay DCC charges. This is because the Proposer believes that with specific representation for DCC Users who are Other SEC Parties, solutions will be developed with input from all Parties. In turn, this could lead to reduce costs for Parties by reducing the risk solutions are developed incorrectly. The member (EL) noted this, referencing, DP218 'Review of the SEC Charging Methodology', and commenting that until that Draft Proposal is finalised, cost savings will be difficult to define.

Another member (EJ) noted that two solution options for DP271 were presented at the last Issues Group, but only one solution was being proposed in the documentation. SECAS (BG) advised that the Proposed Solution is to reallocate existing seats. They added that the other possible solution was to create a new SEC Party category alongside the existing Sub-Committee seats, which would have changed the voting weight at Change Board and some other Sub-Committees. However, it was agreed not to pursue that option. The Chair noted this and highlighted that the chosen solution would not change the voting system.

A member (PD) queried how this will increase the diversity of representation in that community. SECAS (BG) advised that of the four Sub-Committees within the scope of this modification there are ten OSP representatives. Of the ten, only one was an Other User, eight were Manufacturers, and one was a Software Provider. They advised that the Proposer has noted that there are no DCC Users represented on any of the subcommittees. They also noted that because a large portion of the category are Manufacturers, they are likely to vote for another Manufacturer. They stated that ensuring there is a DCC User on these subcommittees will ensure there is representation of that community.

The DCC (DW) queried the Proposers' statement that 'technical solutions may need to be developed'. They noted that usually, the technical solution is developed and taken to the SEC Working Group for feedback before being presented at CSC. They advised that there would have been a lot of opportunity for Other Users to attend the SEC Working Group and provide feedback on DP271. SECAS (BG) noted this and advised that DP271 is focused on what might happen in the future. They stated that the Proposer has observed that as usage of DCC systems is set to increase, it would be useful to have people in place for when this happens. They advised that feedback they have received from other forums is that more examples need to be provided, but noted DP271 is focused on forward planning.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP271 should be converted to a Modification Proposal
- **AGREED** that MP271 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP271

5. 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 member (EJ) asked if Ofgem have informed SECAS on when they will make a decision on MP224 'SEC Performance Assurance Framework'. The Chair advised that Ofgem have not given a date for when they will have their decision made. Ofgem (IC) advised they have no further update on MP224.

The member asked if there was meant to be two changes to Report Phases dates rather than one. SECAS (BG) advised that MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter' had been included but it had since been changed back to its original Report Phase dates, and was now not included.

The Chair highlighted that the DCC returned MP247 'Future Dating of Service Requests for SMETS1 Devices' and MP268 'Certificate rotation and expired Certificates' within their SLA.

The member (EJ) asked when it is likely there will be an outcome from the discussions between the DCC and Arqiva in relation to the 'Updated WAN Coverage Checker' issue. SECAS (BG) advised the proposed changes will be presented to the Operations Group (OPSG) on the coming months.

Another member (EL) asked if the 'Install and Leave guidance in PPM scenarios' Issue is likely to be raised as a Draft Proposal, as guidance does not go through the SEC Modifications Process. SECAS (BG) agreed it will not be a Draft Proposal, but advised the guidance will be changed, which will be agreed with the OPSG.

The member (EJ) advised they were asked by SECAS to raise a Draft Proposal a few months ago in relation to a company going into administration, and asked if there was any update on it. The Chair advised it is possible the issue can be resolved without raising a Draft Proposal. They advised they are still investigating this, and a Draft Proposal will only be raised if it is required. They stated Ofgem have raised a number of concerns, which has delayed the progression. The member noted that discussions had taken place during the Modifications Improvement Project Workshop about how this process could be improved and asked what the result of that had been. The Chair advised that no Modification Proposal is needed as there are no significant changes to the process. However, they agreed that a Modification Proposal to withdraw other modifications had been discussed, along with another in relation to SLAs. The Chair advised they will be presenting a review on the progress made to the SEC Panel.

The CSC:

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

6. Post Decision Delivery

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

The member (EJ) asked if there was a DCC consultation currently open for SECMP0028 'Prioritising System Messages'. The DCC (DW) confirmed that the consultation was published last week and will close on 5 September 2024.

The member asked if the go live date for MP176 'Customer Analytics Reporting' has been confirmed. The Chair stated this has been set in the MP176 legal text.

The member asked if the MP242 'Change to Operational Metrics to measure on success' journey aggregation tracking task which was due to start on 14 August has begun yet. SECAS (KH) confirmed this work is now underway.

The Chair added that there is taking place in preparation for Ofgem approving MP224. However, if Ofgem reject MP224 the work will stop.

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 member (EJ) asked why MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware' was included in the June 2026 SEC Release, as Ofgem have not made their decision on it yet. The Chair noted that Change Board had recommended that Ofgem reject MP207 and advised that it has been included in the event that Ofgem decide to approve MP207. However, if Ofgem decide to reject MP207, it will be removed from the June 2026 SEC Release.

The member observed that MP219 'Accessing Consumption Data on behalf of SEC Parties' was to have an Ad Hoc SEC Release in August 2024 if Ofgem approved it. The Chair noted this and advised it would likely be pushed back to September 2024 if Ofgem decide to approve it.

The CSC:

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

8. SEC Releases Cost Update

The DCC (PMcE) presented an update on the SEC Releases Cost Update.

The Chair referred to the table presented by the DCC. They advised that in February, they had asked the DCC if DCC changes were included in the costs of the SEC Releases that SECAS were unaware of, and the DCC advised there were not. However, it now appeared that there were DCC change costs included that SECAS were unaware of.

The member (EL) advised that the costs presented appeared to be business as usual costs, meaning testing should have the same budget. They noted that Market Wide Half Hourly costs have also been included on the table, but the CSC were unaware of these costs. They agreed with the Chair's comments. They advised that if these additional changes are being included in a SEC Release, and are being costed, yet questioned how the Parties are not being charged twice. They added that they would expect this to be presented at the Quarterly Finance Forum (QFF). The DCC (PMcE) advised that this is a standing testing service cost. They explained that for each DCC project, all post Pre-Integration Testing (PIT) is commercialised by the Service Provider. They advised that the given costs would be if the Data Service Provider (DSP) or System Integrator (S)I needed to carry out testing. They advised there may be business as usual costs that are not reflected here, but they will take an action to find specific costs to present to the CSC. The member noted this and advised that previously the DCC had stated they could not work out these costs. The DCC (PMcE) advised that this had been correct at the time, but advised they could now give an estimate and involve DSP/SI experts earlier in the process to gather enough data to be reasonably accurate.

Another member (EJ) advised that they were under the impression that regression testing was the issue and needed to be reduced, but it appears that most costs are accrued during the post-PIT. The DCC (PMcE) advised that this is due to errors with previously used terminology. They advised that when they refer to regression testing, they are referring to the running of regression packs, end of cycle analysis, and ensuring nothing in the code has been broken. They advised that Service Providers carry out testing in their environment, but in the future the DCC will discuss this with TAG. They stated that the DCC must carry out testing in two environments, as well as User testing. Overall, regression testing is a small portion of the costs. The Chair added that the CSC were initially informed the issue was with regression testing, but the DCC have investigated it further and discovered that costs also sit with System Integration Testing (SIT) and User Integration Testing (UIT) for other Service Providers (not just those providing the change). The Chair advised they previously believed this was covered during the Impact Assessment, but that is not the case. The DCC (PMcE) advised that Service Providers directly involved in the change include costs for SIT and UIT. However, they advised this will not include any other Service Provider costs, nor any Smart Metering Equipment Technical Specifications (SMETS) 1 testing, which drives the discrepancy here.

The member (EL) requested further information on where this spending is being approved, particularly in relation to the June 2024 SEC Release, as the cost increased dramatically from what was agreed by the CSC. They stated they would also like a breakdown of these costs. The DCC (PMcE) advised that Market Wide Half Hourly costs were included, but this went into its own budget separate to that of the SEC Modifications. They advised that the costs presented to the CSC will be unaffordable going forward. The DCC (PMcE) acknowledged this and advised that the cost can never be completely removed, but they are working to reduce it.

The Chair highlighted that one of the reasons this issue arose is because the DCC had not reviewed their testing process for a number of years. As a result of this, the Chair asked if the DCC will now review this annually. The DCC (PMcE) agreed, and advised they are applying this to GBCS by reviewing them after each change that occurs. They advised they can give periodic updates to the CSC and highlighted that the new Data Service Provider (DSP) should provide more opportunities. The Chair advised that regular detailed updates to the CSC are not needed, and noted the DCC's confirmation that these would be reviewed regularly.

A member (EJ) asked what triggered the DCC to look into this. The Chair advised that discussions around DP218 highlighted the issue, as there were questions regarding how much SEC Modifications and SEC Releases cost. They advised that SECAS asked the DCC for figures on this but noticed that they did not align with costs that SECAS had previously agreed to. SECAS queried the DCC about this, who advised that the additional costs were caused by regression testing, which is where the idea of regression testing originated. The DCC (PMcE) has investigated this further and discovered that regression testing only accounts for a small proportion of the costs. The DCC (PMcE) agreed and advised that they and their colleagues would be happy to answer any questions the members have offline and take away any actions. The member asked if this will be presented to the Change Board and SEC Panel. The Chair advised that this has only been presented to the CSC so far, along with the TAG and TABASC Chairs. They advised this has only been presented to a select few whilst the DCC investigated what the actual costs were. They advised this has become clearer and asked if the DCC (PMcE) would present this at the September Change Board. The DCC (PMcE) agreed, and advised more transparency will be needed going forward.

A member (EL) asked what the next steps are, and what is included in the 'cost of everything else' pot. They advised there are still many undefined costs and would like to see them broken down. They also reiterated they would like clarity on who the additional costs were signed off by. The DCC (PMcE) acknowledged the concerns raised and stated that when SEC Modifications are approved going forward, they will have to follow the same process that was carried out for the June 2025 SEC Release. This will involve putting forward an estimate of the post PIT costs, and then refine that estimate to reach an accurate cost. They stated that everything beyond that will go to TAG and User testing. They advised they have spoken with the TAG Chair and agree that the DCC will need to plan this well in advance.

The member (PD) commented that one of the original aims of these discussions was to understand the entire cost of delivery regardless of who is paying it. They advised that the original transparency issue has been resolved based on today's discussion, and there will be the opportunity to revisit it at future CSC meetings if needed. The DCC (PMcE) advised they aim to return to the CSC and give a breakdown of the percentage of costs.

The CSC:

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

ACTION 66/02: DCC (PMcE) to advise the CSC of the specific business as usual costs included in SEC Releases.

9. Any other business (AOB)

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

Next Meeting: 17 September 2024