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SEC Change Sub-Committee Meeting 67_1709

17 September 2024, 10:00 – 12:20

Teleconference

SECCSC_67_1709 – 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
Consumers	Faye Brookes-Lewis (FBL)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
Anita O'Grady (AOG)	Pete McEnerney (PMcE)	
Security Sub-Committee Chair (SSC)		
Gordon Hextall (GH) *(Part Meeting – DP265 Discussion)*		
Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA)		
Gordon Hextall (GH) *(Part Meeting – DP272 Discussion)*		
Ofgem		
Ian Chalfon (IC)	Cristina Ullastre (CU)	
Smart Energy Code Administrator and Secretariat (SECAS)		
Rachel Black (RB) *Meeting Secretary*	Khaleda Hussain (KH)	Simon Grimwood (SG)

Ben Giblin (BG)	Georgie Severin (GS)	Liz Woods (EW)
Stark (MP262 Proposer)		
James Murphy *(Part Meeting – Agenda Item 8)*		

Apologies:

No apologises were received.

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.
The Chair advised that a project relating to this was presented to the Technical Architecture and Business Architecture Sub Committee (TABASC), and they agreed to put initial costs to investigate the business case for end dating versus not end dating, and the impacts of both. They stated that TABASC is responsible for this project, but SECAS will monitor the progression of the project. Status: Closed	
62/01	SECAS to propose solution options for governance of Release scope and costs to the CSC at the September meeting.
The Chair proposed that the CSC consider this at the next meeting. 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.
The DCC (PMcE) advised that they plan to present this alongside the work they have complete on the June 2025 SEC Release. They advised they may be able to present their findings to the CSC before November. Status: Open	
66/01	SECAS to investigate if decisions referred from the Change Board should be referred to the SEC Panel instead of the CSC.
The CSC agreed this should be the responsibility of the SEC Panel. Status: Closed	
66/02	The DCC (PMcE) to advise the CSC of the specific business as usual costs included in SEC Releases.

Action Reference	Action
The DCC (PMcE) asked for clarification regarding the business-as-usual costs, and advised they can give an update offline or at the next CSC meeting. The Chair agreed an update could be given at the October CSC meeting. Status: Open	

3. SEC Modification Progression

DP265 'Implementing ADT changes in response to a Security Incident'

SECAS (GS) presented the CSC with a summary of DP265 'Implementing ADT changes in response to a Security Incident', recommending it progress to the Refinement Process.

A member (JS) queried if there will be costs associated with this change. The Chair advised there will be costs, as it is system impacting.

The member (JS) asked how many security incidents have occurred where DCC services have been suspended. SECAS (GS) advised there have not been any yet. They explained that the SSC want to have this solution put in place as an added proactive action to take should this scenario happen in future. The Chair added that this issue was highlighted during one of their security exercises. Another member (EL) advised that the DCC have suspended User activities in the past, stating that it was due to security reasons. The member stated that an issue was found, and the DCC advised that the solution was to suspend the User, which the DCC stated they are allowed to do under the SEC. The Chair noted that it outlines in the DCC Licence that the DCC have the responsibility to secure their systems, which is likely what the DCC were referring to. The member agreed but highlighted that an agreed process must be followed in such scenarios. The member (JS) noted that these security incidents would rarely occur, and therefore the costs associated with this would need to be considered. The member (EL) agreed.

The Chair acknowledged the concerns raised. They advised the members that if DP265 progresses to the Refinement Process, the business case can be further developed, and if it remains in the Development Stage this can still be done, but the DCC cannot provide an assessment of costs if it remains there. The member (JS) suggested DP265 progress to the Refinement Process, as the costs need to be confirmed before further discussion can take place.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP265 should be converted to a Modification Proposal
- **AGREED** that MP265 should be progressed to the Refinement Process
- **AGREED** the proposed timetable for MP265

ACTION 67/01: SECAS to investigate why the DCC have suspended user activities in the past

DP272 'SMKI Document Set Changes 2024'

SECAS (EW) presented the CSC with a summary of DP272 'SMKI Document Set Changes 2024', recommending it progress to the Report Phase.

The DCC (DW) asked if changing from hard tokens to soft tokens is a system change. The Chair advised it was not a system change. The Proposer and SMKI PMA Chair (GH) agreed and advised that this method is already operating within the Data Service Provider (DSP)

The member (JS) advised that some Independent Gas Transporters (IGTs) have different solutions for Certificate Signing Requests (CSRs) as they install gas meters. The member queried if this development should be brought to the attention of the IGTs to gain feedback and ensure the functionalities they use will not be switched off. The SMKI PMA Chair (GH) advised that they have contacted the Gas Network representatives for SSC and SMKI PMA, and they advised they will not be impacted. They added that MP128A 'Gas Network Operators SMKI Requirements' means they are no longer required to be SMKI Subscribers. The member noted this. The SMKI PMA Chair advised that the SSC and SMKI PMA has contacted all IGTs that use the SMKI Portal via the Internet (SPOTI), and no IGT has responded with their interest. The Chair acknowledged the concerns raised, and advised SECAS will ensure IGTs are informed when DP272 is out for consultation so they will have the opportunity provide feedback.

The CSC:

- **AGREED** the issue and impact as being clearly defined and understood
- **AGREED** that DP272 should be converted to a Modification Proposal
- **AGREED** that MP272 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

ACTION 67/02: SECAS to inform IGTs when MP272 is out for consultation.

MP253 'Traffic Management for Price Cap Update Events – User Actions Required'

SECAS (SG) presented the CSC with a summary of MP253 'Traffic Management for Price Cap Update Events – User Actions Required', recommending it progress to the Report Phase.

The member (EL) noted that based on discussions at Working Group, it appears MP253 will potentially place organisations in a situation of non-compliance. SECAS (SG) advised that they spoke with a DCC User who will be impacted in terms of internal system changes. The User advised they had been in discussions with their Adaptor Provider and had informed SECAS that the actual development time to implement change would be four months, but six months would be given to be safe. SECAS fed this back to the DCC, with the DCC deciding to implement a nine-month implementation clause into the legal text to avoid any situations of immediate non-compliance. Therefore, although if approved MP253 will be implemented in the November 2024 SEC Release, the legally binding SEC obligation will not become active until 7 August 2025. This means that organisations will have enough time to ensure they are compliant by the time the SEC obligation comes into effect. The member queried if organisations advise they cannot meet the deadlines, will the implementation of MP253 be delayed. SECAS (SG) advised that the obligation will become legally binding in August 2025. They advised that if Service Users are concerned about meeting this deadline, they should speak with the DCC and SECAS. However, they advised it is the DCC who will decide if they will allow the User to utilise alternative instructions to assist the User until they can meet the requirements.

The member (JS) stated that the materiality of MP253 depends on the macro market conditions. They queried if the situation is improving will this need to be reviewed. However, they advised they were supportive of MP253 progressing. Another member (EL) agreed.

The member (JS) queried if SECAS should ask in the consultation if Suppliers have engaged with their Adaptor Provider. SECAS (SG) advised it could be included as an additional question. The Chair added that it will also be discussed at the Operations Group (OPSG). SECAS (SG) agreed and advised that OPSG had been concerned about the non-compliance aspect of MP253 prior to the nine-month implementation clause coming into play.

The CSC:

- **AGREED** that MP253 should be progressed to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach

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 member (EJ) noted that the timeline for DP218 'Review of the SEC Charging Methodology' progressing to the Report Phase has been delayed again, and queried if the issue still needs to be addressed through the SEC modification process. SECAS (EW) advised that it depends on how the DCC progress DP218. They advised that once the DCC discuss the findings from the DP218 Request for Information (RFI) with the industry, to the DCC will refine selected options but some of the solution options do not require a SEC Modification. The Chair agreed and explained that the DCC have narrowed it down to two options to begin working on. In relation to the Report Phase, SECAS (EW) advised that DP218 will not be system impacting, so it is still possible for it to progress as planned. Once the DCC issue the DP218 RFI Conclusions Report and dates are confirmed for the next consultation, they will know what the most realistic date is to aim for. They explained the DCC want to keep DP218 open so they can discuss it with more forums via SECAS. If it is decided a SEC Modification is no longer required to resolve the issue, DP218 will be withdrawn.

The CSC:

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

5. Post Decision Delivery and Ofgem expected decision dates

SECAS (KH) presented an update on the Post Decision Delivery and Ofgem expected decision dates.

The member (JS) queried why MP176 'Customer Analytics Reporting' has been delayed. SECAS (KH) advised they will ask the DCC for more information on this. The DCC (DW) stated that the DCC will inform SECAS of the new go-live date soon, and the new date will be in 2025.

The member (JS) asked why it will take four months for Ofgem to make their decision on MP219 'Accessing Consumption Data on behalf of SEC Parties'. The Chair advised there was a six-week period where Ofgem could not make decisions, due to the general election. Since then, Ofgem have been looking for guidance from the new government on how things should be moved forward. The Ofgem representative (IC) agreed.

The CSC:

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

ACTION 67/03: SECAS to give the CSC more information on why the delivery of MP176 has been delayed

6. SEC Releases Update

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

The member (EJ) noted that four Modification Proposals have been added to the November 2024 SEC Release but are highlighted in red and queried if they will be ready to be implemented. SECAS (SG) advised that only MP272 Modification Proposal has been added, and the other three were previously in the scope of this SEC Release. They advised the modifications will be ready to be implemented, but if they experience any more delays, they will miss the SEC Release, which is why they are highlighted in red.

The member (EJ) asked if there will be issues with the June 2026 SEC Release, as it will be impacted by the DSP procurement. The Chair advised they are unsure of the scope of the impact at this time, but the DCC should inform the industry about this in the coming months. The member also noted that MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter' had been scheduled to be implemented in the November 2025 SEC Release. SECAS (SG) agreed and advised that it will no longer be ready for the November 2025 SEC Release, and has been moved to the June 2026 SEC Release for now.

The member also queried why MP241 'Interoperability Checker Update' is scheduled for an ad hoc SEC Release instead of being included in the June 2025 SEC Release. SECAS (SG) advised that the lead time means it will not be ready for this date.

The DCC (BB) asked if MP085B 'Synchronisation of Smart Meter voltage measurement periods (meters currently installed)' is expected to be implemented in the February 2025 SEC Release. SECAS (BG) advised that they are uncertain if it will be ready as the Proposer has asked for more time to discuss the solution with other Network Parties, but it is scheduled for this SEC Release for now.

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper
- **AGREED** the baseline of the February 2025 SEC Release

7. CSC Meeting Dates for 2025

SECAS (RB) presented the CSC with the proposed CSC meeting dates for 2025.

No comments were received from the CSC

The CSC:

- **NOTED** the meeting dates for 2025.

8. Proposed changes to the CSC Terms of Reference

SECAS (BG) presented the CSC with an update on the proposed changes to the CSC Terms of Reference.

The Chair clarified that the changes the CSC are being asked to approve are separate from the progression of MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'.

The member (JS) noted that if MP271 is implemented, there are still certain types of Other SEC Parties (OSP) that will not be specifically represented. The Chair acknowledged this and advised that SECAS are investigating how to improve engagement with the entire OSP category. They advised that the role of SEC Party representatives on Sub-Committees is to represent all organisations under their SEC Party Category. They added that feedback from OSPs has shown that communication SEC Parties and their representatives could be improved.

The Proposer (JM) explained that the Other SEC Parties category is very broad. They advised it is made up of 159 organisations ranging from DCC Users and other companies such as Meter Asset Providers (MAPs), hardware manufacturers, and academic institutions. Therefore, it is challenging for anyone to fully represent the views of each organisation. They stated that the aim of the proposed changes and MP271 is to reallocate one existing OSP seat to give the opportunity for those who are DCC Other Users to sit on the sub committees. They advised there is a forecast increase of usage of the DCC System within the subset of DCC Users, and discussions around DP218 changing charging mechanisms might change how these Other Users are represented at the SEC.

The question had been raised at Working Group if non-voting seats could be added to the Sub Committees. The Chair suggested this was not necessary, as Parties can contact the Chair or Meeting Secretariat to ask if they can attend meetings in a non-voting capacity. They advised including non-voting seats would make the legal text overly complicated. The member (EL) expressed concern regarding confidential information being discussed at Sub-Committees and asked if these attendees would be asked to leave the meeting when Amber, Amber-Strict, or Red items are being discussed. The Chair confirmed this, and advised the attendees would be SEC Parties, and permitted to attend for Clear and Green items.

The member (JS) advised this discussion is focused on the CSC, but noted there are wider discussions taking place in relation to MP271. They noted that none of the three Parties mentioned have nominated themselves for a seat on the CSC, meaning that Other Users are not being voted out of the CSC. Therefore, there does not appear to be an issue of lack of representation at the CSC. The Proposer (JM) noted this, but advised this may happen in the future, and MP271 will safeguard against this.

A member (EJ) advised they are happy with the changes and that it seems sensible. Another member (DD) agreed, noting that the OSP category is extremely large. However, they expressed concerns regarding inconsistency. They highlighted that MP271 has not been approved, and the other Sub Committees may not necessarily agree to this change before then, meaning the CSC would be the only Sub-Committee making this change. This would result in differing representation across the forums. The member (JS) agreed with the concerns raised, and suggested the CSC wait for MP271 to be approved before agreeing to the proposed changes. Another member (EL) agreed. The Chair acknowledged the concerns raised.

SECAS (BG) advised that this will be presented as a discussion item to the Change Board and TABASC before the Refinement Consultation opens.

The CSC:

- **DEFERRED** the decision on the proposed changes to the Terms of Reference.

9. CSC Terms of Reference

The Chair presented the CSC with a summary of the proposed changes to the CSC Terms of Reference.

A member (JS) observed that it states in the CSC Terms of Reference that non-voting attendees can be invited to meetings and questioned if it could be changed to say that non-voting attendees request an invite. They explained this might assist the Terms of Reference changes proposed during Agenda Item 8, regardless of MP271 being approved or rejected. Another member (EL) agreed and advised that the main issue is a lack of commercial interest from SEC Parties. They advised it must be made clear that non-voting attendees are acting as SEC Parties, and whether or not they are a DCC User is a separate matter. They stated that the CSC Terms of Reference should focus on changes that apply to the SEC, and that the members are acting as elected representatives of their SEC Party Category. They agreed that wording in the CSC Terms of Reference needs to be amended and make it more applicable, but some parts of it have been included for a specific reason. They advised that many forum representatives make information available to their SEC Party Category but have not received much feedback.

The Chair acknowledged the concerns raised and advised that more work needs to be done on the CSC Terms of Reference. They advised they will bring this back to the November CSC meeting, along with more information on MP271. A member (JS) questioned if some of the issues raised by MP271 could be tackled here and highlight the transparency of the CSC. However, they noted there are other more technical forums where representatives are not permitted to share information with their SEC Party Category.

The CSC:

- **DEFERRED** the decision on the proposed changes to the Terms of Reference.

10. Any other business (AOB)

The member (EJ) advised they had read an article in the SEC Newsletter about Elective Communications Services (ECS) that was meant to be presented to various forums, and asked if it will be presented to the CSC. A member (EL) advised they were familiar with the topic and will discuss it with the other member offline.

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

Next Meeting: 15 October 2024