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MP271

‘Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents’

Modification Report

Version 0.4

10 December 2024



About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This paper also has four annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the responses to the Refinement Consultation.
- **Annex C** contains the Terms of Reference of the Change Board.
- **Annex D** contains the Terms of Reference of the TABASC.

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1. Summary

This proposal has been raised by James Murphy of Stark.

As of December 2024, there are 165 SEC Parties in the Other SEC Party (OSP) category. This makes it the largest SEC Party category, with 50% of all SEC Parties being classified as an OSP. Within the category there are many different types of organisations, such as Meter Asset Providers (MAPs), Manufacturers, Other Users and academic groups. The Proposer believes that due to the size and differing nature of organisations within the OSP category it is very difficult for OSP representatives to act on behalf of the entire constituency.

The impact of the current arrangements is that OSPs, specifically those who are Other Users, Meter Data Retrievers (MDR) and Registered Supplier Agents (RSA), may not receive appropriate representation on SEC Sub-Committees. The Proposer believes that this may result in technical solutions not receiving the correct input and consequently lead to increased costs for Parties.

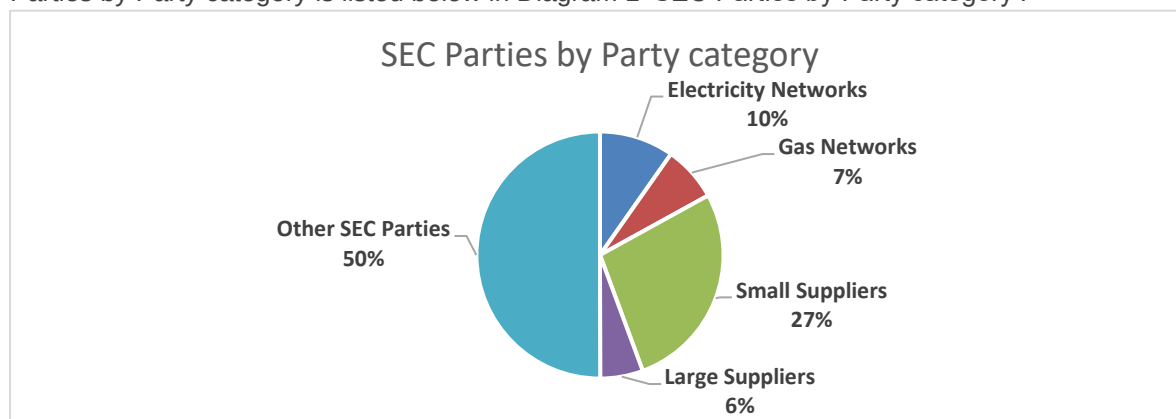
The Proposed Solution is to add an Other SEC Party seat to the Technical Architecture and Business Architecture Sub-Committee (TABASC) membership to be filled by an elected Other User, MDR or RSA. This will increase the number of OSP seats at the TABASC from two to three. The Proposed Solution also seeks to re-allocate an existing OSP seat at the Change Board to an elected Party who acts in the role of Other User, MDR or RSA. The elected Other User, MDR or RSA would be responsible for representing the entire OSP category, rather than just the interests of Other Users, MDR and RSA.

This modification will impact Other SEC Parties. There are no DCC costs associated with this modification and no Party costs were identified in the Refinement Consultation. Smart Energy Code Administrator and Secretariat (SECAS) is targeting this modification for inclusion in the June 2025 SEC Release and it will proceed as an Authority-Determined modification.

2. Issue

What are the current arrangements?

As of December 2024, there are 330 SEC Parties which are grouped into five different Party categories. When a Party accedes to the SEC they are categorised as either an Electricity Network, Gas Network, Small Supplier, Large Supplier or OSP. The current percentage breakdown of SEC Parties by Party category is listed below in Diagram 1 'SEC Parties by Party category'.



The OSP category is the largest of the five constituencies, representing 165 Parties and 50% of the total of all SEC Parties. Unlike the other constituencies which represent one type of organisation, the OSP category encapsulates many different types of organisations such as Meter Manufacturers, MAPs, Consumer Data Services, Other Users and academic groups amongst others.

To represent the OSP constituency, Parties elect representatives at various SEC Sub-Committees. The current OSP representatives at the TABASC and Change Board are listed in the table below (Diagram 2).

Other SEC Party representatives at TABASC and Change Board		
Sub-Committee	Representative	Organisation
TABASC	Ian Lovatt	Chameleon Technology (UK) Limited
	Matthew Hallchurch	Elster Metering Limited
Change Board	Ian Lovatt	Chameleon Technology (UK) Limited
	Patrick Caiger-Smith	Green Energy Options Limited
	Nick Winfield	Landis & Gyr Limited

What is the issue?

The Proposer believes that due to the scale and nature of the Other SEC Party category, it is not possible for OSP representatives at SEC Sub-Committees to adequately represent the entire category. This is because of the high number of Parties in the category, but also because of the different types of organisations within the OSP category. Due to the differing nature of these organisations, they have conflicting priorities, issues and concerns which makes it difficult for OSP representatives to act on behalf of all OSPs. This is especially prevalent at Change Board, where representatives must give due regard to the views expressed by the Parties within their Party Category. The full Terms of Reference for the Change Board and TABASC are available in Annexes C and D respectively.

In particular, the Proposer notes there is a clear delineation between OSPs who are Data Communications Company (DCC) Users (specifically Other Users, MDRs and RSAs) and those who are not. At the TABASC and Change Board the Proposer believes that the existing representatives have expertise mostly as Manufacturers rather than DCC Users.

What is the impact this is having?

The Proposer believes that a lack of representation for Other Users, MDRs and RSAs could mean that their views are not fully represented at forums. In turn, this could lead to increased costs for Parties due to a lack of insight and engagement from the Other SEC Parties who are DCC Users.

The Proposer also notes that in the coming years, usage of the DCC System is set to increase for Other Users, MDRs and RSAs. As such, the Proposer believes it is appropriate that these groups afforded specific representation at the TABASC and Change Board.

The Proposer has stated that they are trying to implement a control to ensure the spread of expertise across OSP representatives to reflect the knowledge within the OSP constituency.

Impact on consumers

During the Refinement Consultation one Party noted their belief that this modification is distracting industry from the issues impacting consumers, drawing effort and resources away from practical issues. In addition, they also noted that if this modification was implemented, it would reduce the number of organisations that can participate in solving them.

Another Party noted that if the modification was implemented it would help consumers, noting they had experienced scenarios where there have been failures in Device testing with Other Users. Due to the lack of testing, this had resulted in Consumers Devices not operating correctly. They believed that implementation of MP271 would ensure the views of Other Users, MDR and RSA are represented at SEC Sub-Committees, helping to prevent issues in future.

3. Solution

Proposed Solution

The Proposed Solution is to add an Other SEC Party seat to the TABASC membership to be filled by an elected Other User, MDR or RSA. This will increase the number of OSP seats at the TABASC from two to three.

The Proposed Solution also seeks to re-allocate an existing OSP seat at the Change Board to an elected Party who acts in the role of Other User, MDR or RSA. This would not change the existing voting make-up of the Change Board, as the newly elected Other User, MDR or RSA would still sit under the OSP voting group.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
✓	Other SEC Parties		DCC

Breakdown of Other SEC Party types impacted			
✓	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers	✓	Flexibility Providers
✓	DCC Other Users	✓	MAPs/ MAMs
✓	Meter Data Retrievers	✓	Registered Supplier Agents

If the Proposed Solution is implemented, then OSPs will be impacted as their representatives will change.

DCC Systems

DCC System changes

There are no impacts on the DCC System or System traffic because of this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Section D 'Modification Process'
- Section F 'Smart Metering System Requirements'

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

During the Refinement Consultation one Party noted that they believed a lack of engagement with Other Users had led to meter variants not being tested sufficiently which had led to Party costs.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **26 June 2025** (June 2025 SEC Release) if a decision to approve is received on or before 12 June 2025; or

- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received after 12 June 2025 but on 23 October 2025.

As this modification requires text-only changes to the SEC it can be implemented in the next possible SEC Release following the Authority's decision. With the current modification timeline, the next possible release this modification could be included in is the June 2025 SEC Release.

7. Assessment of the proposal

Observations on the issue

Change Sub-Committee

SECAS presented this modification to the Change Sub-Committee (CSC) in August 2024 to determine whether this modification should enter the Refinement Process. Noting the Proposer's comment that specific representation for Other Users, MDR and RSA could reduce costs in future, one CSC member questioned where these savings would come from as OSPs do not pay DCC charges. SECAS notes that the Proposer believes that by having representation, OSPs who are DCC Users will be able to provide input into solutions, ensuring they are fully developed, and no unforeseen issues will be encountered in future which could cause costs for Parties which pay DCC charges.

Change Board

As this modification seeks to alter the membership of the Change Board, SECAS presented MP271 to the Change Board to gather feedback for this report.

An OSP Change Board member noted that the Proposer believes existing Change Board and TABASC members have expertise primarily in Manufacturing Devices. They noted that the representatives had varying experiences and classifying them primarily as Manufacturers may not accurately reflect their knowledge.

A Large Supplier Change Board member noted that the User Roles of Other User, MDR and RSA are DCC User Roles and not SEC Party Roles. They advised that when the Legal Text is drafted it should consider this to ensure that any potential changes to Party categorisation are identified.

Other Change Board members questioned why the Proposer did not wait until seats become available to enable them to nominate themselves. SECAS noted that the Proposer had applied to some seats but had been unsuccessful and the purpose of the modification was to increase engagement within the OSP category.

A Large Supplier Change Board member noted the Proposer's argument that existing OSP representatives cannot adequately represent the entire Party Category. The member asked Change Board OSP representatives whether they agreed with the Proposer. One of the OSP Change Board representatives commented that there had been no elections for the OSP seats at Change Board since 2021 which suggested there was no issue with representation.

TABASC

SECAS presented this modification to the TABASC in October 2024. At the time, the Proposed Solution was to re-allocate an existing seat at the TABASC to an elected Party acting in the User Role of Other User, Meter Data Retriever or Registered Supplier Agent. Following feedback from the TABASC, the Proposed Solution was altered to increase the number of OSP seats by one.

A Large Supplier TABASC member noted that re-allocating an existing OSP seat would leave an overreliance on one Party to represent the entire constituency. As such, they suggested adding a new seat to increase input at TABASC. An OSP representative at the TABASC agreed with this suggestion, noting that at the Security Sub-Committee (SSC) there is a specific seat for MDR or Other Users and that this could be applied to the TABASC.

The TABASC Chair and several members noted that re-allocating an existing seat was not preferable. They added that increasing engagement would be positive for the TABASC. The TABASC Chair noted that the Gas Network Party seat was frequently vacant at TABASC and that a clause could be added to the SEC to allow an Other User, MDR or RSA to fill the seat. They added that this would be left to SECAS and the Proposer about how to produce the legal text. SECAS has produced the legal text which seeks to add a third OSP seat to the TABASC, to be filled by an elected Other User, MDR or RSA.

Discussion points

How many applications have there been for OSP seats at the TABASC?

Elections for OSP seats at the TABASC have taken place in three of the past five years (2019-2024) due to the number of nominations exceeding the number of seats. The table below notes the number of applications for the one OSP seat which has come up for election:

Table title		
Year of election	Number of seats available	Number of nominations
2019	1	1
2020	1	4
2021	1	2
2022	1	2
2023	2	2

How many applications have there been for OSP seats at the Change Board?

In the previous five years (2019-2024), only one election (2021/2022) has taken place for OSP seats at the Change Board. In the other years, SECAS received applications from three Parties to be elected to the Change Board. As there were only three applications for the three seats available, no elections took place, and applicants were appointed to the Change Board.

Increasing engagement within the OSP category

During the September Working Group meeting, several members noted that the issue identified in this modification relates to a lack of engagement from OSPs. They added that this modification will change the existing seating arrangements at Change Board and TABASC, however will not resolve

the issue of lack of engagement from OSPs. SECAS is working on how to improve engagement within the OSP category.

A Working Group member who is an OSP representative at the CSC noted that they are rarely approached by Parties to provide views on modifications. They added that OSP representatives could do more to engage with the OSPs to identify their views. Another Working Group member who is an OSP agreed that OSPs representatives could do more to engage with the constituency, noting that without first engaging the constituency the representative could not truly accurately represent the entire OSP category. Another Working Group member noted that it is difficult for some OSP representatives to discuss issues with the wider category due to the classification of papers and items at Sub-Committee meetings.

Another Working Group member noted that only eight of the 159 OSPs were present at the September Working Group meeting. They added that if the issue of representation was as prevalent as the Proposer believes then more OSPs would have attended the meeting.

Decision not to pursue an Alternative Solution

Before this modification was formally raised, the Proposer devised two potential solutions for discussion with the Issues Group. The first solution was to re-allocate existing OSP seats at the TABASC and Change Board. The Alternative Solution was to create a new Party category and add an additional new seat at TABASC and Change Board for the elected Party in this role.

SECAS presented both Solutions to the June 2024 meeting of the Issues Group, where Large Supplier members commented that the creation of a new Party category would lead to changes in the voting make-up of the Change Board. They added that this would lead to Other SEC Parties, who do not contribute to DCC charges, having more voting power than Large Suppliers who pay the majority of DCC charges. Issues Group members also considered the impact of [DP218 'Review of the SEC Charging Methodology'](#) in the re-allocation or creation of new seats.

Following comments from the Issues Group, the Proposer removed the Alternative Solution from the scope of this modification.

Previous modifications relating to seating changes

One previous modification has been raised relating to seating changes and Other Users. [MP084 'Other User Panel Seating Amendment'](#) sought to split the two OSP seats at SEC Panel so that one of the representatives was an Other User, with the other seat being occupied by any Party in the OSP category. This modification was rejected by the Change Board and the Authority in early 2020. Both the Change Board and Authority considered the modification did not have a suitable business case nor better facilitated the SEC objectives.

When do reviews on the composition of Sub-Committees take place?

Reviews of the composition of SEC Sub-Committees take place on a case-by-case basis. The last full review of the Sub-Committee's took place in 2022 which accounted for percentage of market share, DCC usage and share of costs. SECAS expects to complete another review of the Sub-Committees if [DP218 'Review of the SEC Charging Methodology'](#) progresses through the modification process.

Is a modification required to change the balance of Sub-Committees?

Some Sub-Committees have their composition written into the SEC, whereas others have their composition written into their Terms of Reference. For the proposed changes in this modification, changes are needed to SEC Section D 'Modification Process' relating to the Change Sub-Committee, with changes to SEC Section F 'Smart Metering System Requirements' for the TABASC.

Are there are examples of a lack of representation for OSPs who are DCC Users?

The Proposer believes that specific representation would have been useful for Other Users, Meter Data Retrievers and Registered Supplier Agents when the Change Board voted on [MP162 'SEC changes required to deliver MHHS'](#). The Proposer notes that at the Change Board vote, OSP representatives voted to reject the modification (one voted to approve, one voted to reject and one abstained). The Proposer notes that this vote was understandable as the modification did not impact the majority of the Other SEC Party constituency, however for OSPs who are DCC User's or intend to be, the outcome of the vote was very important. The Proposer believes that specific representation for Other Users, Meter Data Retrievers and Registered Supplier Agents in this instance could have led to a different voting outcome.

If changes are made to Sub-Committee composition, will the newly re-allocated seats be filled?

Several Parties have questioned the impact of an Other SEC Party seat being re-allocated but then not being filled. Several Parties at the Other SEC Party Engagement Call, facilitated by SECAS, noted that if the seat remains unfilled then this would reduce the representation for Other SEC Parties.

SECAS has added a clause into the legal text so that if Parties acting in the role of Other User, Meter Data Retriever or Registered Supplier Agent do not apply for the re-allocated seat, any Party from the Other SEC Party category will be able to apply.

Can Parties who are acting in more than one User Role apply?

At the June Issues Group, one member questioned whether a Party who acts in the role of Import Supplier and Other User would be able to apply to represent Other Users, Meter Data Retrievers and Registered Supplier Agents. SECAS has confirmed that any party acting in the role of Other User, Meter Data Retriever or Registered Supplier Agent can apply to represent the group.

Differing responsibilities of the TABASC and Change Board

During the discussion of this modification with the Change Board and TABASC, members noted that the functions and responsibilities of the two Sub-Committees within the scope of the modification are different. Members noted that at the TABASC, representatives provide industry knowledge and experience, whereas at Change Board OSP representatives are acting on behalf of the entire constituency.

Legal text changes to the membership of the TABASC

The Proposed Solution seeks to add an additional seat at the TABASC for the OSP category to be filled by an Other User, MDR or RSA. This will increase the number of OSP representatives at the

TABASC from two to three. SECAS has reviewed the current wording for the membership of the TABASC and believes it should be amended to better align with other Sub-Committees, such as the Change Board and Security Sub-Committee, whose memberships are detailed in the SEC.

Support for part of the Proposed Solution

Parties have noted that the Proposed Solution includes changes to two Sub-Committees and commented that some Parties may wish to support the change to one Sub-Committee but not the other. SECAS included options in the Refinement Consultation to allow Parties to express whether they supported the full solution. All of the six supportive Parties believed that the Proposed Solution should be pursued by the Proposer.

When are the next elections for OSP seats at TABASC and Change Board?

In December 2024 SECAS will ask Parties for nominations to fill the three OSP seats at the Change Board. In October 2025 SECAS will ask Parties for nominations to fill the two OSP seats at TABASC. Parties will have 15 working days to nominate themselves for the seats. Elections will only take place if the number of nominations exceeds the number of available seats.

Terms of Reference changes

Outside the scope of this modification, the Proposer has also proposed changes to the Terms of Reference of the CSC and Operations Group (OPSG). These changes would see one existing OSP seat re-allocated to an elected Party acting in the User Role of Other User, MDR or RSA. These changes are outside the scope of this modification and have no impact on the Proposed Solution.

In September 2024 the CSC deferred the decision on the proposed Terms of Reference changes until after the Refinement Consultation.

In September 2024 the OPSG rejected the proposed changes. OPSG members and the Chair noted that if specific representation was given to Other Users, MDRs and RSAs then other different types of organisations within the OSP category (Manufacturers, MAPs etc) would also want specific representation. As such, OPSG members did not support the proposed Terms of Reference changes.

Why is this an Authority-Determined modification?

This modification proposes changes to the composition of the Change Board. Any changes to SEC Section D 'Modification Process' require the approval of the Authority following the vote at Change Board.

How will SECAS verify Parties are acting in the User Roles of Other User, MDR and RSA?

If this modification is approved, SECAS will amend the nomination forms used for Parties at the TABASC and Change Board. Parties will be required to provide their User Role on the form to determine if they are eligible to represent the OSP Category as an Other User, MDR or RSA.

8. Case for change

Business case

Approval of the modification

The Proposer believes that the existing OSP representatives have expertise in Manufacturing rather than knowledge of how Other Users, RSA and MDR operate. They note that this modification is seeking to implement a control to ensure there is a spread of expertise across OSP representatives given the wide-ranging nature of the organisations within the constituency.

Parties in favour of approval believe that Other Users, MDR and RSA should have specific representation at the TABASC and Change Board, to ensure technical solutions are developed with correct insight. These Parties also noted that usage of the DCC System for these groups are set to increase in the coming years and as such this modification would ensure representation as Users.

Supportive Parties also noted that the TABASC was supportive of adding a seat to increase the knowledge and expertise at their meetings.

Against approval of the modification

Parties against approval of the modification believed that there was limited evidence of the issue identified. They commented that there have been few occasions where elections were needed due to more Parties applying than seats were available. They also believed that this was an issue experienced only by the Proposer not applying for seats, rather than an issue across the entire category. These Parties noted that individuals in the OSP category have the same chance of election for OSP seats and specific representation should not be given to certain organisations. Furthermore, they added that engagement within the OSP category should be improved, rather than amendments made to existing seating arrangements.

These Parties also noted that if representation was given to Other Users, MDR and RSA the elected Party would still have to act on behalf of the entire constituency. They argued this is no change to the current arrangements, as existing representatives can be contacted to listen to views to ensure they are acting on behalf of all within the OSP category.

Views against the General SEC Objectives

Proposer's views

The Proposer notes that Other Users, RSAs and MDRs work on behalf of Suppliers and Consumers by providing metering and data services. They believe representation at the TABASC and Change Board would allow them to provide their expertise which better facilitates SEC Objectives (a)¹, (c)² and (d)³.

¹ To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers premises within Great Britain

² To facilitate Energy Consumers management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems

³ To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy

Industry views

SECAS received nine responses to the Refinement Consultation. Six Parties, all of whom are OSPs, supported approval of the modification. Of the three unsupportive Parties, two were OSPs and one was a Large Supplier.

Views against the consumer areas

Improved safety and reliability

This modification has a neutral impact on improved safety and reliability.

Lower bills than would otherwise be the case

This modification has a neutral impact on lower bills than would otherwise be the case.

Reduced environmental damage

This modification has a neutral impact on reduced environmental damage.

Improved quality of service

This modification has a neutral impact on improved quality of service.

Benefits for society as a whole

This modification has a neutral impact on benefits for society as a whole.

Final conclusions

Supportive Parties have noted that they believe the existing OSP seats at TABASC and Change Board are dominated by Parties which have expertise in Manufacturing. As the OSP is very large and the organisations within it are different, Parties believe this modification will ensure there is representation for OSPs who are DCC Users at Sub-Committees. They also noted that Other Users, MDR and RSA usage of the DCC System is set to increase in the coming years. Therefore, they believe this modification ensures Parties are present in discussions about how the DCC System will evolve in future.

Those against approval of the modification believe there is little evidence to support the issue identified in this modification. They believe this issue is experienced by the Proposer not applying for SEC Sub-Committee seats, rather than a wider issue. They believe that the OSP representatives are capable of acting on behalf of the entire constituency, noting there are very few occasions where they are approached by Parties for them to give views on modifications. They believe this is evidence that there is no issue with the current representatives or arrangements. These Parties believed that rather than changing the existing arrangements at Change Board and TABASC, SECAS and the OSP constituency should seek to work to improve engagement within the OSP category.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	13 Aug 2024
Presented to CSC for initial comment	20 Aug 2024
CSC converts Draft Proposal to Modification Proposal	20 Aug 2024
Modification discussed with Working Group	4 Sep 2024
Modification discussed with Change Board	25 Sep 2024
Modification discussed with TABASC	3 Oct 2024
Refinement Consultation	1 Nov 2024 – 22 Nov 2024
Modification discussed with Working Group	4 Dec 2024
<i>Modification Report approved by CSC</i>	<i>17 Dec 2024</i>
<i>Modification Report Consultation</i>	<i>18 Dec 2024 – 15 Jan 2025</i>
<i>Change Board Vote</i>	<i>22 Jan 2025</i>
<i>Estimated Authority Decision</i>	<i>17 March 2025</i>
<i>Targeted Implementation</i>	<i>26 June 2025</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
DCC	Data Communications Company
MAP	Meter Asset Provider
MAM	Meter Asset Manager
MDR	Meter Data Retriever
OPSG	Operations Group
OSP	Other SEC Party
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee

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Annex A

Legal text – version 0.1

About this document

This document contains the changes required to deliver the Proposed Solution.

Section A ‘Definitions and Interpretation’

The following definition will be included in alphabetical order in the latest version of Section A at the time of implementation.

TABASC Member has the meaning given to that expression in Section F1.3 (Membership of the Technical Architecture and Business Architecture Sub-Committee).

Section D 'Modification Process'

These changes have been redlined against Section D version 11.0.

Amend Section D8.4 as follows:

D8.4 The following persons shall serve on the Change Board (each being a **Change Board Member**):

- (a) one person nominated jointly by Citizens Advice and Citizens Advice Scotland;
- (b) one person appointed by each of the Voting Groups within the Party Category representing the Large Supplier Parties;
- (c) three persons appointed by the Party Category representing the Small Supplier Parties;
- (d) three persons appointed by the Party Categories representing Electricity Network Parties and the Gas Network Parties collectively; and
- (e) three persons appointed by the Party Category representing the Other SEC Parties, provided that at least one of the three must represent a Party or Parties eligible to act in the User Role(s) of Other User, Meter Data Retriever and/or Registered Supplier Agent (unless no representatives of such Parties seek appointment, in which case representatives of any Other SEC Parties may be appointed).

Section F ‘Smart Metering System Requirements’

The Proposed Solution seeks to add another Other SEC Party seat to the membership of the Technical Architecture and Business Architecture Sub-Committee, which should (where possible) be filled by an Other User, Meter Data Retriever or Registered Supplier Agent. In the event no Other User, Meter Data Retriever or Registered Supplier Agent seeks appointment, any Other SEC Party can be appointed to fill the seat.

Although not mandated by this modification, SECAS is proposing to change the provisions in respect of the membership of the Technical Architecture and Business Architecture Sub-Committee so that they better align with the provisions in respect of membership of the Change Board and Security Sub-Committee.

These changes have been redlined against Section F version 21.0.

Amend Section F1.3 and add Sections F1.3A to F1.3D as follows:

~~F1.3 — Membership of the Technical Architecture and Business Architecture Sub-Committee shall be determined by the Panel:~~

~~(a) having regard to the need to provide an appropriate level of technical and business architecture expertise in the matters that are the subject of the Technical Architecture and Business Architecture Sub-Committee’s duties; and~~

~~(b) otherwise in accordance with Section C6.7 (Membership).~~

Membership of the Technical Architecture and Business Architecture Sub-Committee

F1.3 The following persons shall serve on the Technical Architecture and Business Architecture Sub-Committee (each being a **TABASC Member**):

- (a) six persons appointed by the Party Category representing the Large Supplier Parties;
- (b) two persons appointed by the Party Category representing the Small Supplier Parties;
- (c) one person appointed by the Party Category representing Electricity Network Parties;
- (d) one person appointed by the Party Category representing Gas Network Parties; and
- (e) three persons appointed by the Party Category representing the Other SEC Parties, provided that at least one of the three must represent a Party or Parties eligible to act in the User Role(s) of Other User, Meter Data Retriever and/or Registered Supplier Agent (unless no representatives of such Parties seek appointment, in which case representatives of any Other SEC Parties may be appointed).

F1.3A A representative from each of the following persons shall be entitled to attend and speak (but not vote) at any meeting of the Technical Architecture and Business Architecture Sub-Committee:

- (a) the Secretary of State;
- (b) the Authority; and

(c) the DCC (unless the chair of the Technical Architecture and Business Architecture Sub-Committee otherwise directs).

F1.3B Each Party Category referred to in each sub-section of Section F1.3 shall nominate its appointee(s) to serve as TABASC Member(s) to the Secretariat. Each TABASC Member shall serve for a term of two years, and shall be capable of being reappointed at the end of that term. The relevant Party Category may (on notice to the Secretariat) establish a rota whereby more than one person shares the office of TABASC Member.

F1.3C It shall be for the Parties within the relevant Party Category referred to in each sub-section of Section F1.3 to determine how they agree between themselves on the identity of each person to be appointed as a TABASC Member on their behalf. In the event that the Parties within such Party Category cannot so agree, the Secretariat shall seek the preference of the Parties within the relevant Party Category and the person preferred by the majority of those Parties that express a preference (on a one-vote-per-Party basis) shall be appointed as a TABASC Member. In the absence of a majority preference the relevant TABASC Member position shall remain unfilled.

F1.3D The Panel shall only be entitled to remove a TABASC Member from office where such TABASC Member is repeatedly absent from meetings to an extent that frustrates the proceedings of the Membership of the Technical Architecture and Business Architecture Sub-Committee. The Party Category referred to in each sub-section of Section F1.3 shall be entitled to remove the TABASC Member appointed by them from office by notice in writing to the Secretariat; provided that the majority of the Parties within the relevant Party Category must approve such removal.

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MP271 ‘Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents’

Annex B

Refinement Consultation responses

About this document

This document contains the full non-confidential collated responses received to the MP271 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	We consider that specifying that an OSP seat should be filled by one of OU/MDR/RSA roles as far as possible, should help ensure that this subset of OSPs get appropriate representation at important SEC sub-committees and can be engaged in future developments.
Chameleon	Other SEC Party	No	We do not recognise the issue as one that needs solving. There has not been a history of contested OSP seats and definitely not a level that would justify the creation of a new class of SEC Party. Engaged motivated individuals from the MDR, OU and RSA roles have no less chance of election for OSP seats than those from MAP, device manufacturer or other existing OSP organisation. This proposal will fracture the OSP group and we do not agree with the categorisation presented in the modification report. Our organisation has a very different outlook compared to that of a meter manufacturer and as an entity that offers direct to consumer services using a DCC Other User we feel our interests are misrepresented in the report. This suggestion appears short-sighted and will dilute the strength that the OSP group can bring to bear collectively. In our view a more engaged active OSP group would ultimately be a better long-term solution for MDRs, OUs and RSAs with themselves a key part of it.
Hildebrand	Other SEC Party	Yes	Issue, impact and proposed solution described in the Modification Report are clearly articulated and seems a sensible idea. The split between Manufacturers and those who handle data is required and the timing for making this split is good. Note that Hildebrand are a manufacturer and a DCC User; our main role is as a DCC User. We would say that including more of a voice for those who manage data does have an impact on consumers as it may help ensure that their voice is better heard as we make the transition towards our collective net zero vision (Section 2); this is not a direct impact as stated on page 4 of the Modification Report.

Question 1			
Respondent	Category	Response	Rationale
			As an OU we can confirm the point made from the Change Sub-Committee; it has been an expensive process to have to deal with a number of issues with non-responding meter variants, etc. that are a direct result of inadequate testing with the OU role historically. Note that we also suggest that either the Other User Role or Other SEC Parties label are changed - there is ongoing confusion about the difference. This is a point we've been making for quite some time, although not formally.
Smart Meter Assets	Other SEC Party	No	Simply deciding that a representative needs to be one type or another (i.e. DCC User or not) doesn't make it easier for "OSP representatives to act on behalf of the entire constituency". What is presented is a risk rather than an issue – there is scant evidence that DCC user OSPs are being nominated but not elected. Information provided in table 2 incorrectly labels representatives as purely "manufacturer" when they work for organisations who operate in multiple roles and, in any and all cases, elected representatives are not representing themselves or their organisation but the whole constituency. Note that these points were made at Change Board on reading the Mod Report.
SMS Energy Services	Other SEC Party	Yes	Allocating an OSP seat specifically to a Party that is a DCC User in any of the OU/MDR/RSA roles will ensure appropriate engagement and representation of these Users.
Stark	Other SEC Party	Yes	Allocating an OSP seat specifically to a Party that is a DCC User in any of the OU/MDR/RSA roles will ensure that this subset of OSPs get appropriate representation at important SEC sub-committees. With these Users forecast to grow and have a higher proportion of overall DCC traffic, it is important they are engaged across the SEC.
Utilita Energy Ltd	Large Supplier	No	As noted in the modification report, elections to the Other User seats within the subcommittees are rare and have not occurred in recent years, so there is no evidence to suggest that this process does not work.

Question 1			
Respondent	Category	Response	Rationale
			Further, implementing this modification unnecessarily complicates the allocation of seats, requiring manual verification of party status, as the user roles required are DCC roles rather than SEC Party roles. This issue could be resolved through increasing engagement within the Other User group rather than reallocating seats.

Question 2: Do you agree that the legal text will deliver MP271?

Question 2			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	-
Chameleon	Other SEC Party	Yes	The text would deliver the stated aim but we believe this should not be pursued.
Hildebrand	Other SEC Party	Yes	Not legal experts on the SEC so defer to the expertise of whoever wrote that document.
Smart Meter Assets	Other SEC Party	N/A	Not reviewed the legal text as bigger issue is whether the modification is justified.
SMS Energy Supply	Other SEC Party	Yes	No comments
Stark	Other SEC Party	Yes	The text allows for an OSP seat on each relevant committee to be allocated to an OU/RSA/MDR. It also allows for this to revert to any OSP if a OU/RSA/MDR does not come forward.
Utilita Energy Ltd	Large Supplier	No	It is unclear that this modification is required, therefore the legal text is also unnecessary.

Question 3: Do you agree with the proposed implementation approach?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Calisen	Other SEC Party	Yes	-	
Chameleon	Other SEC Party	No	TABASC has already indicated it would want additional seats not a reduction in amount of available expertise and experience. If there is to be a new group of organisations that need separate specific representation Change board seats should be created. In our view it would be better to drive for a more engaged OSP group across the full range of organisations within it.	Before being raised as a modification, SECAS and the Proposer considered creating new seats at the Change Board. This was discussed with the Issues Group in August 2024 who were not supportive of altering the current composition of the Change Board. As such, the Proposed Solution seeks to re-allocate seats at Change Board rather than adding new seats.
Hildebrand	Other SEC Party	Yes	Sooner the better in our view.	
Smart Meter Assets	Other SEC Party	Yes	Agree with the “approach” in terms of the timing but don’t agree this should be implemented at all.	
SMS Energy Supply	Other SEC Party	Yes	No comments	
Stark	Other SEC Party	Yes	No comments.	

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	We do not believe this modification should be implemented.	

Question 4: Will there be any impact on your organisation to implement MP271?

Question 4			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	Not at this time
Chameleon	Other SEC Party	Yes	Harder to continue engaging but more importantly a distraction and potential fracturing of organisations within the OSP group.
Hildebrand	Other SEC Party	Yes	Improves our opportunity to ensure that the voice of the Other User role is better represented in TABASC and the Change Board.
Smart Meter Assets	Other SEC Party	No	
SMS Energy Supply	Other SEC Party	No	The change will not bring any negative impacts, the positive impacts will be our engagement and representation at SEC.
Stark	Other SEC Party	No	No impact to implement but will open up our engagement with the SEC
Utilita Energy Ltd	Large Supplier	No	Should this modification be implemented, there would be no implementation impact on us.

Question 5: Will your organisation incur any costs in implementing MP271?

Question 5			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	No costs	
Chameleon	Other SEC Party	N/A	
Hildebrand	Other SEC Party	No costs	
Smart Meter Assets	Other SEC Party	No costs	
SMS Energy Supply	Other SEC Party	No costs	No comments
Stark	Other SEC Party	No costs	
Utilita Energy Ltd	Large Supplier	No costs	There would be no direct costs for us to implement this.

Question 6: How long from the point of approval would your organisation need to implement MP271?

Question 6			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party		No direct impact
Chameleon	Other SEC Party	N/A	
Hildebrand	Other SEC Party	None	
Smart Meter Assets	Other SEC Party	N/A	
SMS Energy Supply	Other SEC Party	N/A	No lead time required; we will not need to undertake any activities.
Stark	Other SEC Party	N/A	
Utilita Energy Ltd	Large Supplier	No lead time	As there are no actions required by us to implement this, there would be no lead time.

Question 7: Do you believe that MP271 would better facilitate the General SEC Objectives?

Question 7				
Respondent	Category	Response	SEC Objective(s)	Rationale
Calisen	Other SEC Party		A ¹ , C ² , D ³	OU/RSA/MDRs work on behalf of both suppliers and consumers, providing metering and data services for smarting metering. This helps to facilitate objectives a), c) and d) by allowing for increased engagement/representation.
Chameleon	Other SEC Party			No, the motivation appears to be self-interest and is perhaps short-sighted as it would encourage a more divisive and partisan approach from OSPs which won't benefit smart metering and ultimately the MDRs, OUs and RSAs themselves. Driving for a more engaged approach from across the OSP group with representative unified views would lead to a more effective delivery of the SEC objectives. Extra groups and administration with associated costs should be avoided.
Hildebrand	Other SEC Party	Yes	C	
Smart Meter Assets	Other SEC Party	No	N/A	Don't believe there is an issue and the change as proposed will simply mean there is an OSP elected who is a DCC user – why they be any better equipped to “adequately represent the entire category”?
SMS Energy Supply	Other SEC Party	Yes	A, C, D	

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

² To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ To facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

Question 7				
Respondent	Category	Response	SEC Objective(s)	Rationale
Stark	Other SEC Party	Yes	A, C, D	OU/RSA/MDRs work on behalf of both suppliers and consumers, providing metering and data services for SMETS meters. This expertise naturally aligns to, and better facilitates, objectives a), c) and d) by allowing for increased engagement/representation.
Utilita Energy Ltd	Large Supplier	No		As these parties are already able to give input into discussions and issues without having a seat on the subcommittees, there are no additional benefits to be gained by implementing this.

Question 8: Do you believe there will be any impacts on or benefits to consumers if MP271 is implemented?

Question 8			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	Yes	All SEC party roles operate differently and specific changes will impact these parties differently – this change would allow for these specific roles to be appropriately represented.
Chameleon	Other SEC Party	Yes	The discussion is distracting industry from focusing on the issues affecting consumers, drawing effort and resources away from the practical issues the industry is facing. If implemented it would reduce the scope of organisations that can participate in solving them.
Hildebrand	Other SEC Party	Yes	Should help address the current scenario where there have been a number of failures in OU role testing which have resulted in various subsets of consumers (depends on the CH, ESME, or GSME) can't get their data from that device, or join a CAD to their HAN.
Smart Meter Assets	Other SEC Party	No	
SMS Energy Supply	Other SEC Party	Yes	Consumers will have their interests represented more fully at SEC sub-committees, via their OU/MDR/RSA service providers.
Stark	Other SEC Party	Yes	Consumers that use OU/MDR/RSA services will have their interests represented more fully at SEC sub-committees.
Utilita Energy Ltd	Large Supplier	No	We do not believe there would be any additional consumer benefit realised by this modification.

Question 9: MP271 proposes changes to the composition of the TABASC and Change Board. Parties have noted that they support the changes to one Sub-Committee, but not both. Please indicate whether you are supportive of the changes to both Sub-Committees, one of the two, or are unsupportive of the Proposed Solution.

Question 9			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	These groups would benefit from this change
Chameleon	Other SEC Party	I am unsupportive of the Proposed Solution.	TABASC benefits from broad engagement and filtering out organisations does not assist in this. If there is to be a new group of organisations that need separate specific representation Change board seats should be created. Existing OSP organisations are no less relevant or valid after the arrival of new organisations. It could be suggested that taking a seat from large suppliers and allocating to MDR, OUs and RSAs would be similarly justifiable.
Energy Assets	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Hildebrand	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	

Question 9			
Respondent	Category	Response	Rationale
Siemens	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Smart Meter Assets	Other SEC Party	No response	
SMS Energy Supply	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	Changing both will allow for increased engagement and representation in Technical, Governance and Regulatory issues.
Stark	Other SEC Party	I am supportive of the Proposed Solution which involves changes to the TABASC and Change Board.	
Utilita Energy Ltd	Large Supplier	I am unsupportive of the Proposed Solution.	As these seats are allocated via election, and there has been minimal need for elections in previous years due to number of applicants, we do not believe there is any need for changes to either of these bodies at this time. It is also important to note that as the appointments are voted by other members of the same category, in the cases where elections have been required, the overall group have chosen the representative they feel best represents them – attempting to force a seat to a subset of these users could decrease confidence in the representation being provided.

Question 10: Noting the costs and benefits of this modification, do you believe MP271 should be approved?

Question 10			
Respondent	Category	Response	Comments
Calisen	Other SEC Party	Yes	As per question 8
Chameleon	Other SEC Party	No	It does not represent a valuable use of time and resources, with no obvious benefit to consumers or addressing the major issues organisations within smart metering should be collectively addressing.
Energy Assets	Other SEC Party	Yes	Energy Assets supports the full implementation of MP271.
Hildebrand	Other SEC Party	Yes	See responses above
Siemens	Other SEC Party	Yes	Siemens supports the introduction of MP271.
Smart Meter Assets	Other SEC Party	No	No issue identified

Question 10			
Respondent	Category	Response	Comments
SMS Energy Supply	Other SEC Party	Yes	No comments.
Stark	Other SEC Party	Yes	Low costs for high benefits.
Utilita	Large Supplier	No	We do not believe this modification is required. Subcommittee seats are allocated via election, which allows the user group to shape the representation they desire, and forcing specific groups onto specific seats would limit this autonomy and potentially breed discontent over the process.

Question 11: Please provide any further comments you may have.

Question 11			
Respondent	Category	Response	Rationale
Calisen	Other SEC Party		No further comments
Chameleon	Other SEC Party		I believe the while the OSP is a disparate group it has so far generally worked collaboratively. There is a mix of interests and levels of engagement. In my experience there is more unity than division across Other SEC Parties as interests often align or are at worst orthogonal. Most contradictory positions have usually not seen OSPs pitted against one another in “sub categories”. Instead OSPs have typically aligned against another Party type or licenced role holder in discussions. As an OSP representative I have always tried to act in a balanced way representing the interests of the entire group. Engaged experienced individuals from Other SEC Party organisations appear to be in short supply relative to the number of member organisations and all should be welcomed equally. If a group does not feel well represented SECAS should be changing the way it manages the OSP group and engagement within it. I would personally welcome a stronger framework from SECAS steering the engagement between OSPs and their representatives given the absence of an obvious industry body for all members (ie. Energy UK). As suggested by others non-voting access to groups should also be considered where the principal issue is access to information rather than influence over changes. If the partisan approach suggested in this modification was to be progressed, breaking the OSP group up then this would require a much more detailed and complex modification to draw out all the respective groups and ensure each felt it was surrounded by other suitably aligned organisations.
Hildebrand	Other SEC Party	N/A	

Question 11			
Respondent	Category	Response	Rationale
Smart Meter Assets	Other SEC Party	N/A	
SMS Energy Supply	Other SEC Party		No further comments.
Stark	Other SEC Party		No further comments.
Utilita Energy Ltd	Large Supplier		No further comments.

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SEC Change Board Terms of Reference

The Change Board has been established as a Sub-Committee in accordance with SEC Section D8.

Unless otherwise stated, words and expressions that are used in these terms of reference shall have the meanings and application attributed to them under the SEC.

1. Objective

The Change Board will manage, on the Panel's behalf, the following parts of the SEC Modifications Process under SEC Section D:

- decide whether a Modification Proposal is ready for a DCC Impact Assessment to be requested;
- consider each Modification Report and the responses received in response to the Modification Report Consultation;
- decide (for Self-Governance Modifications) or recommend to the Authority (for all other Modification Proposals) whether to approve or reject the Modification Proposal in the form set out in the Modification Report (and, where there is at least one Alternative Solution, confirm whether the approval or rejection relates to the Proposed Solution or to an Alternative Solution); and
- recommend to the Authority whether to approve or reject a proposed Authority-Led Variation.

2. Membership

2.1 Chairman

The Chairman shall be appointed by SECAS. The Chairman's role will be to chair meetings, facilitate discussions and encourage consensus. They shall not have a vote.

The Chairman shall appoint an Alternate Chairman to cover any meeting where they are unable to attend.

2.2 Secretary

The Secretary shall be provided by SECAS. The Secretary will be responsible for taking the minutes, agreeing and circulating agendas and papers, and calling and booking meetings. They shall not have a vote.

2.3 Voting Members

The Change Board shall comprise of the following Voting Members:

- One person appointed from each Voting Group within the Large Supplier Party Category (who shall together form the Large Supplier constituency);
- Three persons appointed by the Parties within the Small Supplier Party Category (who shall together form the Small Supplier constituency);
- Three persons appointed by the Parties within the Electricity Network and Gas Network Party Categories collectively (who shall together form the Network Party constituency);
- Three persons appointed by the Parties within the Other SEC Party Category (who shall together form the Other SEC Party constituency); and
- One person appointed jointly by Citizens Advice and Citizens Advice Scotland (who shall form the Consumers constituency).

Voting Members will be appointed via a vote among Parties in the corresponding Party Category. They will serve a one-year term and may stand for re-election at the end of this period.

Voting Members shall appoint an Alternate to attend and vote on their behalf where they are unable to attend a meeting.

2.4 Non-Voting Attendees

The following Non-Voting Attendees are entitled to attend and speak at meetings, but shall not have a vote:

- The Authority may appoint a representative to sit on the Change Board.
- The DCC may appoint a representative to sit on the Change Board.
- Representatives from SECAS may attend meetings to advise on Modification Proposals being discussed at that meeting.
- Other individuals may be invited to attend for all or part of any meeting, as agreed in advance by the Chairman.

3. Duties and powers

The Change Board shall perform the following duties:

- determine whether the work performed on a DCC Systems impacting Modification Proposal is sufficiently well developed for the DCC Impact Assessment to be performed, with the costs of that incurred by Parties. Where the Change Board believes this is not the case, it will need to state what further work is required before it will agree to request the DCC Impact Assessment;
- consider each Modification Report and the Modification Report Consultation responses presented at the end of the Modifications Process. It will agree whether the Modification Report is ready to be voted upon, and if not what further analysis or clarifications are required before the Modification Report can be voted upon; and

- perform the final vote on approval or rejection of a Modification Proposal. For a Self-Governance Modification, the Change Board's vote shall form a decision, which is then subject to a 10 Working Day period in which Parties can refer this outcome to the SEC Panel before becoming final. For any other Modification Proposal, this vote shall form a recommendation to the Authority, who will make the final decision.

Each Voting Member will act in a manner consistent with the SEC Sub Committee Obligations and giving due regard to the General SEC Objectives.

When assessing a Modification Proposal, each Voting Member shall:

- take account of representations given by any Party, giving due regard to the views expressed by the Parties within their Party Category;
- seek to clarify with the relevant Party any representation that is not clear to the Voting Member, or which the Voting Member considers to be based on a misunderstanding of the facts; and
- seek to act in the best interests of the majority, whilst representing the minority view (and, where a majority is not significant, the Voting Member should consider whether abstention from the vote best represents the interests of the Parties they represent).

4. Proceedings of the Sub-Committee

4.1 Convening meetings

Regular meetings of the Change Board shall be scheduled each month.

The Secretary shall, at the request of the Chairman, convene additional meetings by giving notice to Members at least five Working Days prior to the proposed meeting date.

For each meeting that is convened, the Secretary shall send notice to each Member with details of the time, date and location of the meeting. Unless specified otherwise, meetings will be held at the Code Administrator's offices with teleconferencing facilities made available.

An agenda, papers and other material for a meeting shall be distributed by the Secretary to Members at least five Working Days before the meeting, to allow Members to consider these items prior to the meeting. The Secretary shall notify Members at this time if there will be any late items.

Where the Change Board needs to be convened at short notice to vote on an Urgent Modification, the above timescales may be shortened to fit the timetable approved by the Authority.

4.2 Quorum

Unless otherwise directed by the SEC Panel for a specific Modification Proposal, quoracy for the Change Board shall comprise:

- At least three Voting Members from the Large Supplier constituency;
- At least one Voting Member from the Small Supplier constituency;
- At least two Voting Members from the Network Party constituency; and
- At least one Voting Member from the Other SEC Party constituency.

If there are fewer (or no) Voting Members appointed within a constituency, the required number of Voting Members needed will be adjusted to the number who have been appointed.

A meeting shall be quorate if the necessary Voting Members (or their approved Alternates) are present in person at the meeting or are contactable by telephone conference call.

4.3 Voting

The Change Board may only vote if a quorum is present at the meeting.

When presented with a Request for Impact Assessment, the Change Board shall, following discussion, vote on whether to request the DCC Impact Assessment or whether to return the Modification Proposal to the Working Group for further work.

When presented with a Modification Report, the Change Board shall, following discussion, vote on:

- other than for an Authority-Led Variation, whether to determine that the Modification Report should be returned to the Working Group (or, where there was no Refinement Process, the Code Administrator) for further clarification or analysis; and if not
- whether to approve the Proposed Solution or any Alternative Solution set out in the Modification Report (with separate votes performed for each solution on the basis that each Voting Member may vote to approve a maximum of one solution).

When casting a vote to accept or reject a Modification Proposal, each Voting Member must state the reason for their vote and explain how the solution does or doesn't better facilitate the achievement of the SEC Objectives.

A Change Board vote shall take the form of separate votes performed within each constituency referenced in Section 2, the outcome of each forming that constituency's collective vote. Each constituency's collective vote shall be determined by simple majority among the Voting Members in that constituency. The overall Change Board vote shall be determined by simple majority of the constituency votes.

With the prior approval of the Change Board, a Change Board vote may take place by correspondence outside of a meeting, with each Voting Member providing their vote and rationale to the Secretary electronically within a time period of at least two Working Days. For such a vote to be valid, the number of responses received must meet quorum.

For the avoidance of doubt:

- an abstention shall be treated as if no vote was cast;
- where there are no Voting Members present from a constituency or every Voting Member present abstains, that constituency shall be deemed to have abstained; and
- a tie amongst any vote cast shall be deemed a vote not in favour.

4.4 Minutes of Meetings

The Secretary shall minute the proceedings and decisions of the Change Board, including the names of those in attendance. Draft minutes will be circulated to all Change Board Members for approval.

4.5 Reporting to the Panel

The Chairman shall provide updates on the work of the Change Board to the SEC Panel, having regard to any confidentiality issues, which will include, but not be limited to, a summary of key decisions, recommendations and activities arising at the meeting.

5. Confidentiality and disclosure

The Change Board is required to abide by the [SEC Panel Information Policy](#).

All matters discussed at Change Board meetings shall be public and classified as White (unrestricted), except for confidential responses received to consultations that the Change Board will need to review as part of any decision it makes, which will be classified as Red (Change Board Members and their alternates only).

Prior to commencing duties as a Change Board Member, each Member will be asked to sign declarations to confirm they will:

- abide by the confidentiality and disclosure provisions in relation to each information sharing level as described in the SEC Panel Information Policy; and
- act as a Sub-Committee Member in accordance with the terms of the SEC.

All other attendees will also be asked to sign a declaration that they will abide by the confidentiality and disclosure provisions in relation to each information sharing level as described in the SEC Panel Information Policy.

Change Board Members who breach the rules of the confidentiality and disclosure provisions under any information sharing level may have their membership ended.

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Technical Architecture and Business Architecture Sub-Committee

Terms of Reference (ToR) Version 2.4

The Technical Architecture and Business Architecture Sub-Committee (TABASC) shall be established pursuant to SEC Section F1.

1. The role of the Technical Architecture and Business Architecture Sub-Committee

1.1 The overall scope of the TABASC comprises the following;

- Maintaining and developing the Technical and Business Architecture documents, and provision of feedback and support to the Panel and on request of the Authority, in respect of any issues or disputes, effectiveness or matters concerning the Technical and Business Architecture.
- Providing support to the SEC Modification process as set out in Section 1.2 below.

Specifically, the prescribed duties and powers of the TABASC are set out in SEC Section F1.4 – F1.5, & F2.1 – F2.2A, F2.14-F2.17 and are described below:

- a) Provide any information requested by the Authority regarding the technical aspects of any Notification;
- b) Provide the Panel with support and advice in respect of Disputes relating to Technical Code Specifications (or other parts of this Code that affect the End-to-End Technical Architecture and/or the Business Architecture);
- c) Review and report to the Panel on the effectiveness of the End-to-End Technical Architecture;
- d) Review and report to the Panel on the effectiveness of the Business Architecture;
- e) Review and report to the Authority and the Panel on the effectiveness of the Home Area Network (HAN) Requirements, not including the Alt HAN Arrangements specifically but having regard for any impact of the provision of Alt HAN Services on the End-to-End Technical Architecture and/or the Business Architecture;
- f) Support the Panel in any technical and business architecture aspects of the annual report;
- g) Develop and maintain the Technical Architecture Document;
- h) Develop and maintain the Business Architecture Document;
- i) Provide the Panel with support and advice in respect of any other matter concerned with the End-to-End Technical Architecture and/or the Business Architecture, including assessing potential impacts and risks associated with any proposed changes to DCC Systems;

- j) Liaise with, provide advice to, and seek advice of the Alt HAN Forum on matters that relate to the End-to-End Technical Architecture and/or the Business Architecture;
- k) Perform any other duties expressly ascribed to the Technical Architecture and Business Architecture Sub-Committee elsewhere in the Code;
- l) Act in cooperation with, and send a representative to, the SMKI Policy Management Authority (PMA)¹ and Technical Specification Issue Resolution Subgroup (TSIRS) or any other Sub-Committee or Working Group which requests the support or attendance of the Technical Architecture and Business Architecture Sub-Committee;
- m) Oversee the maintenance of the Incompatibility Matrix;
- n) Oversee the maintenance of the Central Products List and subsequent submission to Panel;
- o) Oversee the maintenance of the Firmware Information Repository;
- p) Oversee the maintenance of the list of Auxiliary Load Control Switch (ALCS) /HAN Controlled Auxiliary Load Control Switch (HCALCS) / Auxiliary Proportion Controller (APC) / Stand Alone Auxiliary Proportion Controller (SAPC) Labels; and
- q) It is also noted that the terms of reference of the TABASC may be adjusted to reflect changes within Smart Metering governance including where transitional group responsibilities are transferred by a transitional governance group.

1.2 Supporting the Modifications Process

The TABASC will provide structured input to the Modifications Process in respect of Draft Proposals and/or Modification Proposals that may impact the Technical Code Specifications, the End-to-End Technical Architecture and/or the Business Architecture.

In doing so, the TABASC will:

- i. Review, refine, and enhance technical and business requirements for a Modification Proposal, liaising with the DCC, Users and Manufacturers as necessary;
- ii. Consider how the change can be implemented in the most efficient way such that it delivers greatest overall value, both from an operational and implementation approach;
- iii. Make a definitive recommendation to the Change Board and Change Sub-Committee as to whether or not a Modification Proposal is ready to be issued for a Preliminary Assessment or Impact Assessment;
- iv. Review DCC Preliminary Assessment and Impact Assessment responses, including the suggested solution and implementation approach, and provide feedback to the Working Group, Change Board and Change Sub-Committees so that any feedback can be passed to the DCC;
- v. Review a Modification Proposal solution and provide feedback to the Working Group,;
- vi. Identify input from other SEC Sub-Committees to support the refinement of technical and business requirements;
- vii. Identify any issues and impacts that are likely to affect the End-to-End Technical Architecture and/or the Business Architecture (utilising the [TABASC Principles for Assessing Modification Proposals](#)) to be included in the Modification Report; and

¹ Smart Metering Key Infrastructure Policy Management Authority

- viii. Utilising the [TABASC Principles for Assessing Modification Proposals](#) to assess the impacts of each SEC Release that are likely to affect the End-to-End Technical Architecture and/or the Business Architecture.

2. Proceedings of the TABASC

2.1 Meetings

The TABASC shall hold meetings with such frequency as it may determine or the TABASC Chair may direct, but in any event shall meet when necessary to meet its responsibilities at least once every two months.

2.2 Quorum

No business shall be transacted at any meeting of the TABASC unless a quorum is present at that meeting. The quorum for each TABASC meeting shall be one half of all TABASC Members appointed at the relevant time, at least one of whom must be the TABASC Chair or the TABASC Chair's nominated alternate.

2.3 Meeting Notice and Papers

Each meeting that the TABASC determines, or the TABASC Chair directs, shall be convened by the Secretariat. A minimum of five Working Days' notice shall be provided (or such shorter notice as directed by the Panel, or the TABASC Chair).

The notice of each meeting shall be accompanied by:

- Time, date and location of the meeting
- Arrangements for those wishing to attend the meeting by means other than in person
- Agenda and supporting papers

2.4 TABASC Chair

The SEC Panel shall approve the appointment of the TABASC Chair and shall review the appointment in three years from the date of appointment.

Selection of the TABASC Chair shall be determined by the SEC Panel, providing the selection ensures that:

- the selection does not preclude the Panel Chair fulfilling this role
- the candidate selected is regarded by the Panel as having suitable experience and expertise to discharge their duties as the TABASC Chair
- the candidate has declared any relationships or shareholdings with individuals or organisations that might be perceived to create a conflict of interest and, in light of such declarations, the SEC Panel believes that the candidate will be able to act in a sufficiently independent manner in their role as the TABASC Chair
- The Chair shall arrange for a suitable alternate to deputise on occasions when the Chair may be unable to attend a meeting of the TABASC

The TABASC Chair shall not be entitled to vote unless there is a deadlock, in which case the TABASC Chair shall have the casting vote.

2.5 Powers and Voting

In accordance with C6.9 of the SEC:

- each TABASC Member shall be entitled to attend, and to speak and vote at, every meeting of the TABASC;
- all decisions of the TABASC shall be by resolution. In order for a resolution of the TABASC to be passed at a meeting, a simple majority of those TABASC Members voting at that meeting must vote in favour of that resolution. In the event of a voting deadlock, the TABASC Chair shall have the casting vote; and
- a resolution in writing signed by or on behalf of all the TABASC Members shall be as valid and effective as if it had been passed at a meeting of the TABASC duly convened and held. Such a resolution may be signed in any number of counterparts.

Each TABASC Member must first provide written confirmation to agree to serve on the TABASC in accordance with the SEC before exercising powers or voting.

2.6 Membership

The Panel shall invite applications from individuals to serve on the TABASC in accordance with SEC Section C6.7. Those individuals shall be of suitable experience and qualifications required to fulfil the duties of the TABASC as determined by the Panel in accordance with SEC Section F1.3.

Members shall act independently, not as a delegate, and without undue regard to the interests, of any Related Person and will act in a manner designed to facilitate the performance by the Panel of its duties under the SEC.

Members may propose another natural person to act as their Alternate by completing the necessary paperwork and notifying SECAS. TABASC members may wish to nominate an Alternate with a complimentary skill set to their own, considering the integrity of both Business and Technical Architecture. The Alternate, once approved, may attend the TABASC and must act in the capacity as Alternate to discharge the member's duties. The Alternate must complete the declaration as described in SEC C3.8 (a) and (c) prior to voting.

2.6.1 Composition

The voting TABASC Members shall be as follows:

- 6 Members from the Large Supplier Party Category
- 2 Members from the Small Supplier Party Category
- 2 Network Operator Parties
- 2 Members from the Other SEC Party Category

In addition to the Party Category Members, representatives from the DCC, the Authority and the Secretary of State will also be invited to attend on a standing basis in a non-voting capacity.

2.6.2 Term of Office

The TABASC Chair will review membership of the Sub-Committee on a two- yearly basis, inviting applications from individuals in accordance with SEC Section C6.7. The normal term of office for each member is 24 months. For the first term of office half the membership will serve a 12-month term.

2.6.3 Other Interested Parties

In addition to the core TABASC Members, the TABASC Chair is entitled to invite any persons the TABASC determines it appropriate to do so. It is envisaged that any such persons will be able to

provide the TABASC with expert advice on technical matters. TABASC member Alternates may be invited to TABASC meetings to fulfil this purpose.

A representative of the Secretary of State is entitled to attend and speak at the TABASC meetings and will be provided with copies of all agendas and supporting papers.

2.6.4 Member Confirmation

Before a person may serve on the TABASC as a Member or Member's Alternate, that person shall provide written confirmation to SECCo that:

- they agree to serve on the TABASC in accordance with the SEC;
- they will be available as reasonably required by the Sub-Committee to attend at least 50% of meetings and miss no more than 3 meetings in a row without sending an Alternate. Members should also be prepared to undertake some work outside of meetings;
- they shall be prepared to promptly give their expert view, contributing to discussions on matters within the scope of these Terms of Reference; and
- they should also seek views from their Party category where appropriate, in accordance with the Panel Information Policy.

2.6.5 Conflict of Interest

Given that members have a duty to act independently, conflicts of interest should not regularly arise. Members shall have a duty to identify whether a decision presents a conflict of interest. In such cases, the member shall absent themselves from the meeting for the purposes of that decision.

3. Secretariat

SECAS will provide the secretariat and code management for the TABASC. This includes but is not limited to:

- Prepare and maintain the TABASC Member Pack (code of conduct and expenses policy)
- Timetable and organise the TABASC meetings, including meeting rooms
- Act as quality gatekeeper with the Chair for accepting papers
- Circulate agendas and papers for consideration at TABASC meetings, 5 Working Days in advance of that meeting date
- Monitor the quorum prior to meetings to ensure that decision matters are not frustrated or deferred
- Circulate minutes of the meeting five working days after the meeting for the TABASC's approval
- Administer the circulation list for TABASC papers and Minutes
- Manage the TABASC decisions, actions and risks and issues log
- Manage the TABASC section of the SEC website
- Support the operation of the TABASC and the fulfilment of its duties through:
 - co-ordination, and where directed by the TABASC undertaking, all inputs, analyses, assessments and consultations required to support the TABASC business;

- preparation of monthly updates to the Panel on the activities undertaken by the TABASC and drafting the TABASC input to the Panel's annual report as per SEC Section C2.3(h) for the TABASC's approval;
 - co-ordination of the TABASC's role in the SEC Modifications Process through the relevant SECAS Modification lead(s) and using the 'TABASC Principles for assessing Modification Proposals' document, to ensure a holistic and efficient process exists between the TABASC and the Change Board;
 - co-ordination of the TABASC's review of the effectiveness of the End-to-End Technical and Business Architecture and report any recommendations for action to the Panel;
 - maintenance of the TABASC Technical Architecture Document and Business Architecture Document ensuring End-to-End processes are captured in line with the current SEC.
- Facilitate the TABASC's review of any changes made to the DCC Release Management Policy and the Panel Release Management Policy;
 - Maintenance of the Central Products List and submission process;
Maintenance of the Firmware Information Repository; and
 - Maintenance of the list of Auxiliary Load Control Switch (ALCS) /HAN Controlled Auxiliary Load Control Switch (HCALCS) / Auxiliary Proportion Controller (APC) / Stand Alone Auxiliary Proportion Controller (SAPC) Labels.

4. Confidentiality and Disclosure

Given the potential sensitive nature of work of the TABASC, agenda items, papers and discussions will be assigned an information sharing level of either CLEAR, GREEN, AMBER, AMBER-STRICT or RED, as per the [SEC Panel Information Policy](#). As a TABASC Member, each participant will be asked to undertake in writing to abide by the confidentiality and disclosure provisions in relation to each information sharing level as described above, by signing the Confidentiality and Disclosure Agreement at Appendix A to these Terms of Reference.

Individuals who the TABASC Chair has invited to attend a meeting of the TABASC will also be asked to sign the Confidentiality and Disclosure Agreement but will only be permitted to attend the TABASC during discussions on agenda items relevant to their organisation.

TABASC Members who breach the rules of the confidentiality and disclosure provisions under any information sharing level may have their TABASC membership ceased.

5. Review

The Terms of Reference, membership and operation of the TABASC may be reviewed by the Chair at any time to ensure that they remain appropriate to reflect the duties and requirements of the SEC. Amendments to these Terms of Reference will be approved solely by the SEC Panel.

6. Definitions

For the purpose of adding clarity to the ToR, the terms in the left- hand column shall have the meaning given to them in the right- hand column, as defined in the SEC:

Term	Definition
Authority	means the Gas and Electricity Markets Authority as established under Section 1 of the Utilities Act 2000.
Alt HAN Arrangements	has the meaning given to that expression in condition 22.20(e) (Principal contents within the Smart Energy Code) of the DCC Licence.
Alt HAN Forum	means the body of that name established in accordance with Section Z.1.1 (Establishment of the Alt HAN Forum).
Alt Han Services	has the meaning given to that expression in Section Z6.1 (Definitions).
Business Architecture	means the business architecture which is designed to enable Parties to use the Services and/or to enable Parties, Energy Consumers and those acting on behalf of Energy Consumers to access the functionality described in the Technical Specifications.
Business Architecture Document	means a document that describes the Business Architecture.
Central Products List	has the meaning given to that expression in Section F2.1.
Change Board	Means the Sub-Committee established by the Panel to: (a) decide whether a Modification Proposal is ready for a DCC Impact Assessment to be requested; (b) consider each Modification report and the responses received in response to the Modification report consultation; (c) decide whether to approve or reject the Modification Proposal in the form set out in the modification report; and (d) decide whether to approve or reject a proposed Authority led variation.
Change Sub-Committee	means the Sub-Committee established by the Panel to facilitate the development, refinement and discussion of Draft Proposals prior to their progression as Modification Proposals.
Code Administrator	Has the meaning given to that expression in Section C7.1 (Code Administrator).
Competent Authority	means the Secretary of State, the Authority, and any local or regional or national agency, authority, department, inspectorate, minister, ministry, official or public or statutory person (whether autonomous or not) of the government of the United Kingdom (but only insofar as each has jurisdiction over the relevant Party, this Code or is subject matter).
DCC Release Management Policy	has the meaning given to the expression in Section H8.9
DCC Total System	means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code, including the DCC User Interface, the SMETS1 SM WAN, the SMETS2+ SM WAN and Communications Hubs except for those Communications Hubs which are:

Term	Definition
	(a) SMETS1 CHs; (b) neither installed nor in the possession of the DCC; and/or (c) installed, but are not Commissioned.
Device	means one of the following individual devices: (a) an Electricity Smart Meter; (b) a Gas Smart Meter; (c) a Communications Hub Function; (d) a Gas Proxy Function; (e) a Pre-Payment Meter Interface Device; (f) a HAN Connected Auxiliary Load Control Switch; (g) any Type 2 Device.
Draft Proposal	means a proposal made in accordance with SEC section D Modification Process
Electricity Network Party	means a Party that holds an Electricity Distribution Licence.
End-to-End Technical Architecture	means the DCC Systems and the Smart Metering Systems together, including as documented in the Technical Code Specifications.
Gas Network Party	means a Party that holds a Gas Transporter Licence.
Home Area Network (HAN)	means, for each Smart Metering System, the home area network created by the Communications Hub Function forming part of that Smart Metering System.
Large Supplier Party	means a Supplier Party that is not a Small Supplier Party.
Modification Proposal	is the term applied to a Draft Proposal once the Panel has agreed it should be progressed further in accordance with Section D3.11 (Initial Consideration by the Panel).
Other SEC Party	means a Party that is not the DCC, is not a Network Party, and is not a Supplier Party.
Panel	means the body established in accordance with Section C2.1.
Party Category	Means, as the context requires, one of the following categories; (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; and (e) the Other SEC Parties collectively.
RDP Systems	means any Systems: (a) which are operated by or on behalf of an Electricity Distributor or Gas Transporter responsible for providing (or procuring the provision of) Registration Data in respect of a particular MPAN or MPRN; and (b) which are used in whole or in part for: (i) the collection, storage, Back-Up, processing or communication of that Registration Data prior to, or for the

Term	Definition
	purposes of, its provision to the DCC over the Registration Data Interface; (ii) generating Data for communication to the OCA, ICA or DCCICA, or receiving Data from the OCA, ICA or DCCICA (including any Systems which store or use Secret Key Material for such purposes), and any other Systems from which the Systems described in paragraphs (a) and (b) are not Separated.
Related Person	means, in relation to an individual, that individuals' spouse, civil partner, parent, grandparent, sibling, child, grandchild or other immediate family member; any partner with whom that individual is in partnership; that individual's employer; any Affiliate of such employer; any person by whom that individual was employed in the previous 12 months; and any company (or Affiliate of a company) in respect of which that individual (individually or collectively with any members of his immediate family) controls more than 20% of the voting rights.
SECCo	has the meaning given to that expression in Schedule 4.
SEC Objectives	means, in respect of Charging Methodology only, the Charging Objectives and, in all other cases, the General SEC Objectives.
Secretary of State	has the meaning given to that expression in the Interpretation Act 1978.
Small Supplier Parties	means a Supplier Party which, at the time at which it is necessary to assess the status of the Party, supplied electricity and/or gas to fewer than 250,000 (two hundred and fifty thousand) Domestic Premises.
Smart Metering Key Infrastructure (SMKI)	means the public key infrastructure established by the DCC for the purpose, among other things, of providing secure communications between Devices and Users.
Technical Architecture Document	means a document setting out a representation of the End-to-End Technical Architecture.
Technical Code Specifications	means the Technical Specifications, the GB Companion Specification, the DCC Gateway Connection Code of Connection, the DCC User Interface Code of Connection, the DCC User Interface Specification, the Self-Service Interface Access Control Specification, the SSI Baseline Requirements Document, the Self-Service Interface Code of Connection, the Registration Data Interface Documents, the Message Mapping Catalogue, the Incident Management Policy, the SEC Release Management Policy, the DCC Release Management Policy, the Smart Meter Key Infrastructure (SMKI) Interface Design Specification, the SMKI Code of Connection, the SMKI Repository Interface Design Specification, the SMKI Repository Code of Connection, and the SMETS1 Supporting Requirements.
Technical Specification	means each of the CHTS and the SMETS.

Term	Definition
User Systems	means any Systems (excluding any Devices) which are operated by or on behalf of a User and used in whole or in part for: (a) constructing Service Requests; (b) sending Service Requests over the DCC User Interface; (c) receiving, sending, storing, using or otherwise carrying out any processing in respect of any Pre-Command or Signed Pre-Command; (d) receiving Service Responses or Alerts over the DCC User Interface; generating Data for communication to the OCA, DCA, ICA or DCCKICA, or receiving Data from the OCA, DCA, ICA or DCCKICA (including any Systems which store or use Secret Key Material for such purposes) but excluding communications in relation to Devices that do not have an SMI Status of "commissioned" or "installed not commissioned"; and/or (e) generating any Unique Transaction Reference Number, and any other Systems from which the Systems used in whole or in part for the purposes set out in paragraphs (a) to (f) are not Separated.

All other defined terms have the same meaning as that which is attributed to them in the SEC.

APPENDIX A

Confidentiality and Disclosure Agreement

I, the undersigned, have read and understood the Technical Architecture and Business Architecture Sub-Committee Terms of Reference.

I understand that I am required to comply with the confidentiality and disclosure obligations in respect of each of the four information sharing levels (CLEAR, GREEN, AMBER, AMBER-STRICT and RED), as set out in the Terms of Reference.

I understand that I must declare any conflict of interest that I have in writing to the TABASC Chair whether it exists now or during my continued membership of the group, as soon as I become aware that such a conflict exists.

I understand that should I fail to abide by the information sharing levels, confidentiality and disclosure obligations, or conflict arrangements (as set out in the Technical Architecture and Business Architecture Sub-Committee Terms of Reference) I may be excluded from the Technical Architecture and Business Architecture Sub-Committee.

Having understood and accepted the above statements, I therefore agree to abide by the Terms of Reference in my engagement with this group.

Name:

SEC Party Category:

Primary/Alternative Participant:

Signature:

Date:

Terms of Reference v2.3
Dated: (16/11/2020)