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SEC Change Sub-Committee Meeting 70_1712

17 December 2024, 10:00 – 11:20

Teleconference

SECCSC_70_1712 – Draft Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers	Alastair Cobb (AC)	British Gas
Small Suppliers	Daniel Davies (DD)	ESG Global
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
Other SEC Parties	Philip Doyle (PD)	Reverve Ltd

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
Jack Hammond (JHa)	Stuart Drinan (SD)	
Ofgem		
Ian Chalfon (IC)		
Smart Energy Code Administrator and Secretariat (SECAS)		
Sophia Master (SM) <i>Meeting Secretary</i>	Khaleda Hussain (KH)	Liz Woods (EW)
Ben Giblin (BG)	Georgie Severin (GS)	Marc Rhodes (MR)
Simon Grimwood (SG)		

Apologies:

Representing	CSC Members	Organisation
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Large Supplier	Emslie Law	OVO
Consumers	Faye Brookes-Lewis (FBL)	Citizens Advice
Other SEC Parties	Jeff Studholme (JS)	Smart Meter Assets
Ofgem Representative	Cristina Ullastre (CU)	Ofgem

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the CSC meeting.

SECAS (SM) 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
69/01	SECAS Head of Continuous Improvement and Project Delivery to attend the December 2024 CSC meeting to provide further information on the set up of the SEC Performance Assurance Board (PAB)
	This will come under the governance of the Operations Group (OPSG). The OPSG Chair (Jason Stevens) has been requested to provide an update. A provisional update has been given to the CSC Chair (AB) – The person who will be leading the project will be starting in January, so there will be a point of contact for people to send their PAB queries to in January. A more detailed updated will be given in the new year. Status: OPEN
69/02	SECAS (SG) to investigate creating a SEC Releases page on the SECAS website.
	SECAS (SG) investigated creating a SEC Releases page on the SECAS Website. SG confirmed there was an issue when publishing. However, the page exists, and IT are looking into this. No further comments were made. Action: To confirm with EJ that she is happy with these changes as EJ raised this. Status: Closed
69/03	SECAS to add the requirement to 'seek' Party Category views to the CSC Terms of Reference (ToR).
	The requirement for representatives to 'seek' the views of the Party category that they represent was added to the ToRs. Also added was that meetings will be recorded going forward for minuting purposes. The new ToRs including these changes will be presented to Panel for approval. No further comments were made. Status: Closed
69/04	The Chair (AB) to report back to the CSC on what can be achieved from the Benefits Realisation project.

Action Reference	Action
	The Chair (AB) to report back to the CSC on what can be achieved from the Benefits Realisation project. This is currently ongoing, and the project brief is going to panel today. An update will be provided Status: OPEN

3. SEC Modification Progression

MP268 'Certificate rotation and expired Certificates'

SECAS (EW) presented the CSC with a summary of [MP268 'Certificate rotation and expired Certificates'](#).

This was raised by Brad Baker from the DCC and SECAS (EW) advised SECAS are looking to progress to Report Phase. SECAS (EW) presented a summary to the CSC of the Issue, Impact and Proposed Solution. Devices manufactured after the 2024 Manufacturing Pack release may contain information from an Organisation Certificate with a Validity Period exceeding ten years. There are no explicit SEC requirements for post-Commissioning replacement of Organisation Certificate information by the DCC. The impact is that it is anticipated that Devices installed in 2026, and beyond which contain expired Certificates will need to be replaced. The Proposed Solution is to provide clear guidelines in the SEC for mandating post-Commissioning replacement of Organisational Certificates by the DCC and the guidelines will provide explicit instructions and timelines for replacing any Organisation Certificates for the period that is longer than 10 years or is revoked or expired. In the Proposed Solution Prepayment Interface Devices (PPMIDs) will be excluded from the automatic Access Control Broker (ACB) Organisation Certificate replacement due to known limitations. The additional data reporting will be part of the existing monthly Post-Commissioning Obligations (PCO). Service Users and Communication Service Providers (CSPs) receive a weekly report which details all their Devices which are currently failing the PCO checks as introduced under [MP183 'Post Obligations Reporting'](#).

SECAS (EW) presented the highlights of the Impact Assessment. There will be no impact to the Technical Specifications, infrastructure or any other Data Service provider (DSP) changes.

Refinement Consultation respondents noted that the change related to the Organisation Certificates has no direct effect on Suppliers. From a Supplier perspective, it was noted that this is a beneficial change, and the respondent agreed with the proposed implementation approach. The legal text will impact SEC Section G and Appendix AC.

The Working Group supported the modification, and they agreed there was a lack of explicit instructions to replace certificates. The Technical Architecture and Business Architecture Sub-Committee (TABASC) believed the certificate replacement should take place after 48 hours but before 7 days. The Security Sub-Committee (SSC) advised that it should be no sooner than 48 hours and no later than 23 days after Install and Commission (I&C). The SSC also noted the reporting requirement is captured within current PCO reporting. The SSC noted after the Impact Assessment was provided to them last week, that the DCC currently does this, and new DSP has a requirement to do it. The SMKI PMA noted similar and were curious as to why this is needed to 'cover' this process until the new DSP is active.

The DCC (SD) provided more detail on what this modification is changing and noted there are obligations on Energy Suppliers and Network Operators. There are SEC obligations on the DCC

already in place for CSPs, Wide Area Network (WAN) Providers and 4G Device Manager. The logic of avoiding the first two days of a Device being installed is so that the DCC updates don't clash with Energy Suppliers Install and Commissioning and Post-Commissioning Obligations. The DCC does not proactively rotate the ACB during Post-Commissioning but instead performs manual Ad Hoc certificate rotation. The DCC does not currently do anything with Enduring Change of Supplier (ECOS), which is a little challenging as the DCC has requirements and Obligations to deplete the Transitional Change of Supplier (TCOS) as efficiently and quickly as possible. This Modification will mandate post-Commissioning replacement of Organisation Certificate information by the DCC within the SEC and legal text. The new DSP migration is expected to start in 2028 but the ACB certificates expire in 2026. There will be a two-year difference in when the new DSP starts and the ACB Certificate expires. The DCC are automating rotation to avoid it being manual and to avoid being an informal ask on their Service Providers.

The DCC (SD) presented figures from January 2024, showing that there were 16 million certificates which will expire in 2026. There are 27 million ACB certificates in use which were generated in 2018, which is a sign that rotation is working, but it is currently not automatic nor efficient. The DCC have the Organisation Certification Authority (OCA) Manufacturing Pack Programme where they are introducing new certificates preinstall.

Certificate diversification will manage the certificates and how the DCC prevent them from expiring. The DCC (SD) confirmed that PPMIDs are not in scope of MP268. They highlighted that SECMP0007 enabled firmware upgrade in PPMIDs but the DCC have not seen a huge amount of activity in upgrading legacy PPMIDs Firmware Versions and there are legacy defects on PPMIDs around certificate rotation. The DCC are not actively testing certification rotation in PPMIDs as part of business as usual and System Integration Testing (SIT). The DCC (SD) suggested proceeding with MP268 and reviewing once MP268 goes live.

SECAS (EW) advised it is mainly the DCC who will be the impacted Party.

The Chair of the TABASC (JH) asked the DCC (SD) if the DCC are prevented from doing this now. The DCC (SD) advised there is nothing which is preventing the DCC from doing this now. JH stated that they did not see a need to put this into the SEC and had no concerns on the DCC rotating the certificates. JH queried the post Pre-integration Testing (PIT) cost. SECAS (EW) advised it will be £289,00 plus Post PIT costs.

DW explained the cost for System Integration Testing was £162,000 and there will be an additional User Integration Testing (UIT) cost which is part of the scheduled SEC Release. JH raised concerns on the cost of the assessment of change and queried why the DCC require cost to be paid when it should be a requirement that DCC should be undertaking. SD advised that the DCC have a requirement around depleting TCOS, but they don't have anything around number of days or any of the SSC Requirements for post commissioning within ECOS.

The Chair (AB) questioned if this could be taken offline so it can be agreed that the modification should move onto the next phase. SECAS (AB) was concerned that any hold up would mean that the modification would miss the November 2025 SEC Release. A CSC member (AC) would like the questions in the consultation to reflect the discussion and the question around if the obligations should be explicit. The Chair (AB) agreed and confirmed the Modification Report would be updated with the conversation, so everyone is aware of the conflicting views.

The CSC:

- **AGREED** that MP268 should be progressed to the Report Phase

- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP268 should be progressed as a Self-Governance Modification

MP275 'Section K changes to support 4G Communications Hubs rollout'

SECAS (GS) presented the CSC with a summary of [MP275 'Section K changes to support 4G Communications Hubs rollout'](#).

This was raised by Jonathon Helyer from the DCC, and SECAS recommended this progress to the Report Phase. SECAS presented that the Communications Hubs (CH) Charges are split into Single Band and Dual Band highlighting that 4G CH will be solely Dual Band. In terms of the CH Return Not Redeployed Explicit Charge, it was not originally envisioned for a full-scale swap out of all CHs in a Region. The concerns around these two Charges are that it might provide a disincentive for Suppliers from installing 4G CHs to avoid these higher Charges in the early years of 4G deployment and consumers in the North Region may also see an increase in charges to account for 4G CH installation in the Central and South Region. The Proposed Solution would be the introduction of a unitary charge. This would bridge the gap between the Single and Dual Band CHs and ensure the Charges are shared across consumers equitably.

In response to the Refinement Consultation, four large Suppliers agreed that the modification should be implemented. One large Supplier believed the modification should be rejected and there was one abstain pending further information. Respondents were overall supportive of the Modification and the Proposed Solution. There were concerns raised about volatility and final costs to the industry. The DCC confirmed it will engage with Suppliers to make sure the Terms of Reference at the Quarterly Finance Forum (QFF) are accurately recorded and the information that is reported is to the benefit of attendees. One respondent to the Refinement Consultation was concerned about the impact on consumers, which they believed would be positive as the proposed charging framework provides a better commercial 4G model.

Ofgem granted Urgency for the Modification, so the solution can be included in the calculations for the Ofgem April Price Cap. Ofgem initially expressed concern that parties may not have the full picture. However, SECAS have been working with the DCC to answer as many questions as possible ahead of the Report Phase. SECAS facilitated a teaching session with the DCC on 5 November 2024 with interested Parties, where further clarification was provided on the intended Charges model.

The impacted Parties will be Suppliers, and costs are limited to SECAS implementation costs. Respondents to the Refinement Consultation quoted consequential implementation costs between £100k – £1m. Whilst these costs would not be for the implementation of the Modification itself, the quoted costs relate to changes to business processes that Parties would have to amend. SECAS is targeting an ad hoc SEC Release one Working Day following Authority Decision. The Proposer and respondents to the Refinement Consultation believed that the SEC Objectives that are best facilitated are (a), (b), (d) and (g).

The CSC provided no feedback on the information presented.

The CSC:

- **AGREED** MP275 should be progressed to the Report Phase
- **APPROVED** the Modification Report

- **APPROVED** the implementation approach
- **AGREED** that MP275 should be progressed as an Authority-Determined Modification

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

SECAS (BG) presented the CSC with a summary of [MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'](#)

This has been raised by James Murphy of Stark and SECAS are looking to progress to the Report Phase. The issue identified by the Proposer is that currently there are 165 Parties within the Other SEC Party (OSP) category. The Proposer believes that due to the size of the Other SEC Party category, and the broad range of types of organisations, it is difficult for the existing Other SEC Party representative to fully act on behalf of the entire constituency.

The Proposed Solution intends to re-allocate one of the three existing OSP seats in the Change Board to that of an elected Party which acts in the User Role of Other User (OU), Meter Data Retriever (MDR) or Registered Supplier Agent (RSA). For TABASC, the Proposed Solution intends to add an additional OSP seat to be filled by an elected Party which acts in the User Role of OU, MDR or RSA. This has been presented to that TABASC which agreed to adding an additional seat as a preference.

The Refinement Consultation responses shows that six Parties supported the proposed changes to the TABASC and Change Board and three were against the changes. The supportive Parties advised that the modification better facilitates SEC Objectives (a), (c) and (d). The targeted SEC Release for the Proposed Solution is June 2025, as changes to SEC Section D 'Modification Process' require this to be an Authority Determined Modification.

The CSC:

- **AGREED** that MP271 should progress to the Report Phase
- **APPROVED** the Modification Report
- **APPROVED** the implementation approach
- **AGREED** that MP271 should be progressed as an Authority-Determined Modification

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 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 CSC:

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

6. SEC Releases Update

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

The CSC:

- **NOTED** the updates on the SEC Releases provided in the paper
- **AGREED** the re-baseline of the June 2025 SEC Release for non-DCC System-impacting modifications

7. Any other business (AOB)

There was no further business from members.

SECAS (GS) noted that in addition to having the document form of the Refinement Consultation and Modification Report Consultation, SECAS has investigated the opportunity of offering Parties a Google Forms alternative.

SECAS (GS) explained that one drawback to the Google Forms would be the fact that Parties would only be able to view and re-work their response only after an initial submission. This may impact Parties that circulate consultations within their business and collate responses from different departments. The Chair (AB) advised Google Forms may still be beneficial to Parties that do not circulate responses through different departments or have limited resources to respond to them. The Chair (AB) then confirmed Google Forms will be added as an alternative based on the above argument and clearly caveating at the start of the Google Form that Parties would need to submit a response before being able to amend.

Chair closed the meeting.

Next Meeting: 21 January 2025