

Change Sub-Committee Meeting 75

20 May 2025

Meeting Recordings

- Change Sub-Committee meetings will be recorded for the purpose of ensuring accuracy of meeting minutes. By participating in the meeting, you accept that your voice will be recorded for this purpose.
- Just a reminder that we should be able to have free discussions of ideas

Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



■ CSC Terms of Reference

The CSC is the delegated Sub-Committee of Panel for dealing with Modifications. The CSC has power to determine:

- If the **stage gates** have been completed
- If the **scale** (both sides and therefore business case) is understood
- **Modification is confirmed as the most appropriate solution**
- Affected **SEC areas** identified
- Where applicable, potential high-level **solution** options for resolving the issue have been identified (including, where possible, an assessment of whether costs and complexity would be high, medium or low to inform the benefits case of proceeding).

■ CSC Terms of Reference

Determine whether the solution(s) proposed in a Modification Proposal is sufficiently developed and understood that it can be progressed to a final decision:

- A **solution** (or solutions) has been clearly defined
- The **impacts** of the solution(s) on all participants have been fully identified
- All implementation and on-going **costs** have been drawn out and scrutinised
- The **implementation approach** has been clearly laid out, including the technical specification versions arising from the change
- The changes to the **SEC documentation** have been fully drafted
- The **business case** for change has been fully defined
- An assessment against the Applicable **SEC Objectives** and the **consumer benefits** analysis have been completed
- All questions raised along the way have been **answered**

■ Agenda

1. Approval of previous meeting minutes
2. Actions Outstanding
3. SEC Modification Progression
4. SEC Modification Timetables
5. Post Decision Delivery
6. SEC Releases Update
7. Any other business



Agenda Item 1

Approval of previous meeting minutes
Sophia Master (SECAS)

■ Recommendations

- No comments were received from the previous meeting minutes
- **APPROVE** these minutes as final



Agenda Item 2

Actions Outstanding

■ Actions Outstanding

Ref	Action	Owner	Update	Status
73/01	DCC to provide an update on the June 2024 SEC System Release Costs and the costs for all non-market wide elements at the next CSC Meeting.	DCC	The DCC are to provide the Change Sub-Committee members on an update at the May Change Sub Committee meeting in order to provide clarity on the savings made as part of the June 2024 SEC Release.	Propose to Close
Action handed over from SWG	SECAS to review the modification process to determine if cost implications are being appropriately assessed (e.g. the inclusion of Opex costs as well as Capex).	SECAS	This will be considered as part of the actions from the Benefits Realisation project.	Open



Agenda item 3

SEC Modification Progression

■ DP292 'DSP DBT Finance Facility'

Georgie Severin

Raised by Jonathon Helyer from the Data Communications Company (DCC)

Progress to Report Phase

MEDIUM

Overview

- SEC is prescriptive of the finance facilities for the DCC.
- Latest finance facility was 4G CH DBT.
- Without generalised DBT reference, DCC cannot obtain financing for other DBT facilities unless mentioned in the SEC.

Issue



- Without a DSP DBT financing facility, the DCC cannot mitigate the costs of the DSP DBT, leading to increase in costs.
- The current DSP FBC was created on provision of finance for DSP DBT.
- If this is not done, DCC would need to review Charging Statements for RY25/26.

Impact



- Proposed Solution would be legal text change to SEC Section A, SEC Section J, SEC Section K and SEC Section M.
- Following the same requirements as previously drafted for 4G CH DBT.

Proposed Solution



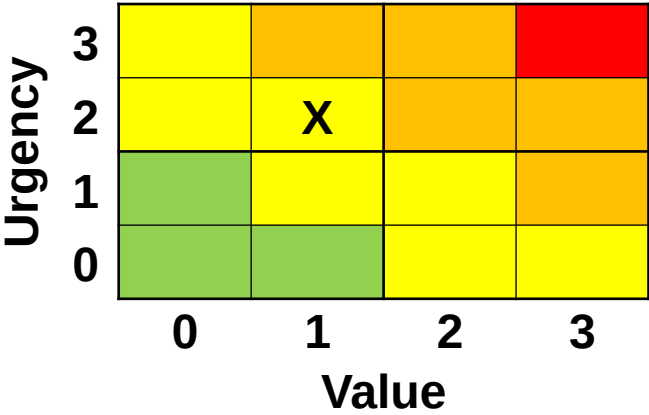
■ Prioritisation

Legal & regulatory compliance	Operational performance	Cost benefit	Consumer impact	Security impacts	Value	Urgency	Priority
1	0	1	1	0	1	2	MEDIUM

Rationale

The modification would allow the DCC to remain compliant with the SEC and its own Licence.

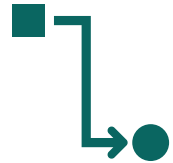
Cost benefit for Parties as costs for DSP DBT would be spread over a five-year finance period.



■ Timetable

Date	Event/Activity	Notes
21 May 2025	Enter Report Phase	
25 June 2025	Change Board Vote	
26 June 2025	Estimated implementation	

DP292: Assessment of Change



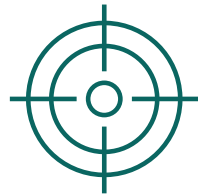
Impacted Parties

- Suppliers
- Network Parties
- DCC



Costs

- SECAS implementation costs



Target Release

- June 2025 SEC Release



Benefits

- Minimise short term increases in DCC Parties' charges which in turn will minimise consumers' charges.

SEC Objectives (b) and (g)

(b) enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence

(g) facilitate the efficient and transparent administration and implementation of this Code

■ DP292: Recommendations

- **DETERMINE** whether the issue and the impact it is having is clearly defined and understood
- **DETERMINE** whether DP292 should be converted to a Modification Proposal
- **DETERMINE** whether MP292 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP292 should be progressed as a Self-Governance Modification

■ DP291 'DNO Alerts to Suppliers'

Georgie Severin

Raised by Alison Godden from E.ON

Co-sponsored by Julie Brown from British Gas

Progress to Refinement Process

MEDIUM

■ Background of the issue

Suppliers have obligations to detect and prevent Energy theft/tampering

Electricity Standard Licence Conditions (SLC) 12.1 to detect & prevent theft or abstraction of electricity or interference with metering equipment.

Retail Energy Code (REC) Schedule 7 Energy Theft Reduction to achieve Theft Detection Incentive Scheme targets.

Retail Energy Code (REC) Annex A : Theft Charter to investigate the theft of energy legally actively.

Suppliers should also monitor Anomalous Alerts and Events and take reasonable action to resolve these in line with SEC Sections G3.15-G3.16.

Overview

- Loss of visibility of some Events and Alerts following E&A and the introduction of GBCS.
- Created difficulty in creating accurate models of a SMS behaviour that could suggest potential tamper and/or theft activity for further investigation

Issue



- High cost to industry from energy theft (estimated between £830m - £1.4bn in 2023)
- High safety risk for consumers
- Stolen energy may be billed in proven cases of theft, which may create debt and affordability vulnerabilities to customers.

Impact



- Supplier Access to the following Alerts that are currently only available to DNOs
 - '8F36 Supply Outage Restored - Outage >= 3 minutes'
 - '8F35 Supply Outage Restored'
 - 0x8F3B 'Supply Outage Restored on Phase 3 Restored'
 - 0x8F3C 'Supply Outage Restored on Phase 3 Restored - Outage >= 3 minutes'

Potential Solution



■ Prioritisation

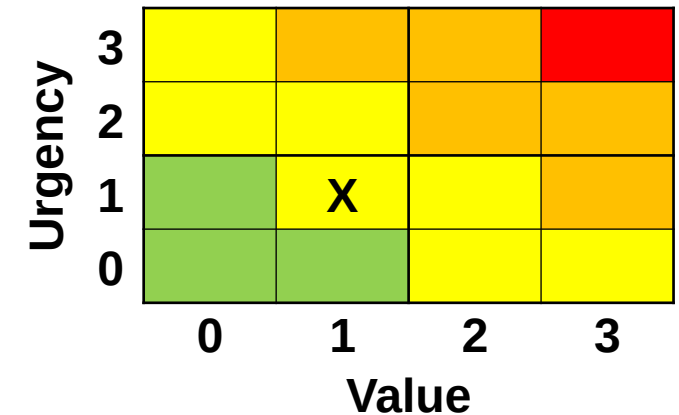
Legal & regulatory compliance	Operational performance	Cost benefit	Consumer impact	Security impacts	Value	Urgency	Priority
1	2	0	2	0	1	1	Medium

Rationale

The modification would allow Suppliers to better comply with their obligations.

It would improve operational performance by increasing the likelihood of determining meter tampering.

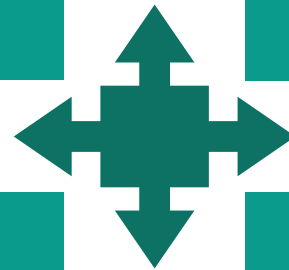
Positive consumer impact as it would lead to safer premises if meter tampering is identified.



■ DP291: Assessment of the Issue

Issue has been clearly defined. Suppliers would benefit from these DNO Alerts in building modelling mechanisms to determine meter tampering/Energy theft.

Energy theft/meter tampering is costly. Around £830m - £1.388bn annually. 400% increase in tampering cases between 2017-2021, expected to increase.



A change to the SEC is required to allow visibility of the DNO Alerts to Suppliers.

Costs and any impacts to Parties will be determined during the RFI period and later during the DCC Impact Assessments.

■ Areas for Assessment

Increased traffic as part of the potential solution

- DCC traffic may increase as part of the solution. Allowing visibility of DNO Alerts to Suppliers has the potential to increase DCC traffic. This should be investigated as part of Solution Development (ascertain whether it would increase traffic and by how much)

GBCS impact of the potential solution

- Solution can be GBCS-impacting and this would take a significant amount of time to be implemented.
- DSP data duplication should be looked at as the way to deliver the solution as this is likely more time effective.

Benefits of implementing the Potential Solution

- Increased safety for consumers
- Reduced Energy Theft
- Reduced costs for consumers

■ Timetable

Date	Event/Activity	Notes
May – June 2025	Request for Information	<i>RFI to identify scale of the issue at an industry level. Also identify preference for GBCS/DSP solution route.</i>

Issues Group

Supports the modification

Expressed early preference
for DSP potential solution
as opposed to GBCS

■ DP291: Recommendations

- **DETERMINE** whether the issue and the impact it is having is clearly defined and understood
- **DETERMINE** whether DP291 should be converted to a Modification Proposal
- **DETERMINE** whether MP291 should be progressed to the Refinement Process
- **AGREE** the first package of work and the timetable for MP291

MP268 'Certificate rotation and expired Certificates'

Georgie Severin

Raised by Brad Baker from the DCC
Self-Governance

HIGH

■ MP268: Overview

- Devices manufactured after 2024 Manufacturing Pack release may contain information from an Organisation Certificate with a Validity Period exceeding ten years.
- SMKI PMA deems that Certificates with a Validity Period longer than ten years are an increased security risk
- No explicit SEC requirement for post-commissioning replacement of Organisation Certificate info by the DCC.

Issue



- Anticipated that Devices will be installed in 2026, and beyond which contain expired Certificates which will need to be replaced.

Impact

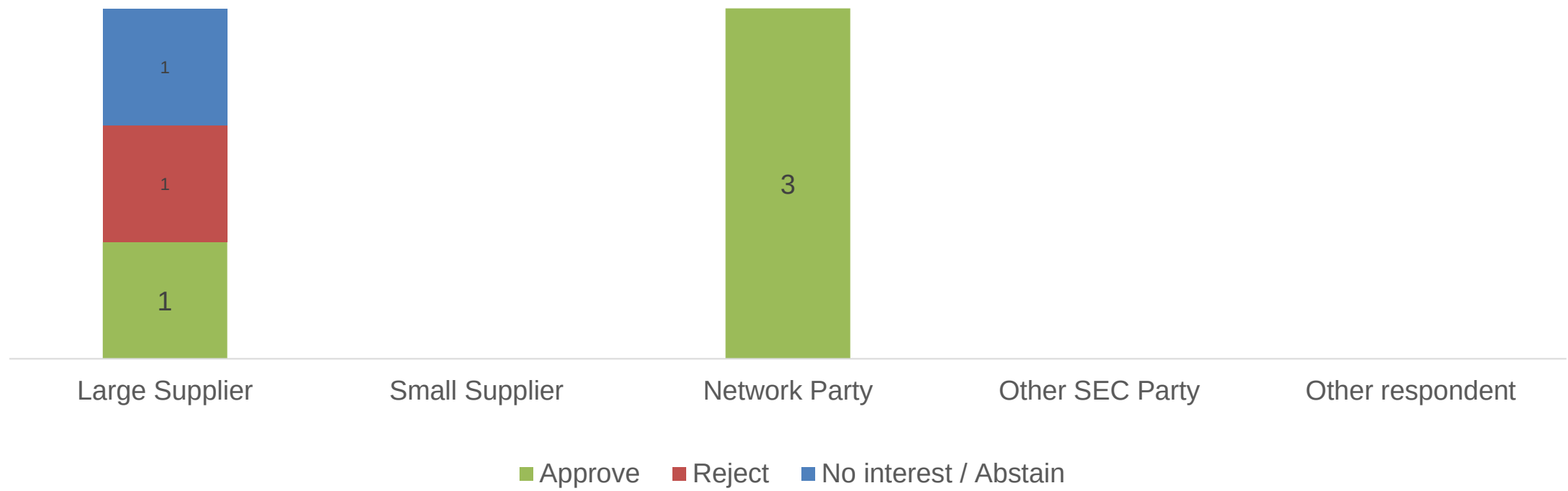


- Clear guidelines within the SEC mandating Post-Commissioning replacement of Organisation Certificates by the DCC.
- Guidelines will provide explicit instructions and timelines for replacing any Organisation Certificate which has a Validity Period longer than ten years or is revoked or expired.

Proposed Solution



MRC responses



MRC responses – Key comments

For

- It will be vital that this is incorporated into SEC Governance as an ‘explicit’ obligation – we cannot be held to account (nor other parties) against something which is only implied.
- This change is a prudent approach to ensuring both security and compliance.
- Propose that a thorough review is conducted to identify if there are any other implicit DCC activities in the SEC that would benefit in being made explicit.

Undecided

- Believes the modification is required; however needed more work to understand the timing and requirements, including whether any cost reductions can be achieved.
- Making the requirements explicit would help avoid confusion, but did not believe MP268 is an urgent modification.
- Needs to be addressed from a security point of view, especially with the increased threat posed by quantum computing in the future.

Against

- Cost to make this explicit does not seem a worthwhile change to be made when the security obligation is already covered in the SEC.
- A cost of close to half a million Pounds to effectively establish guidelines seems unreasonable. Whilst we accept the necessity to maintain Smart Meter Security, we do not believe this requires such excessive costs when the SEC already implies this obligation.

■ Post-MRC Update

SECAS, DESNZ, TABASC Chair,
SSC Chair and the DCC
discussed post-
commissioning replacement
of Organisation Certificate
info by the DCC

Where possible for the DCC
to provide alternative
reduced cost solution

Remove the DCC Total
Systems impacting portions
from MP268

Go ahead as a text-only
change to the SEC

Forum views

Working Group

Supports the modification

Agreed there is a lack of explicit instruction to replace Certificates

Should not impact I&C – Highlighted Certificate replacement should take place after 7 WD

TABASC

Believe Certificate replacement should take place after 48 hours but before 7 days

Most Suppliers have completed I&C after 48 hours and before 7 days to better align to PCO

Part of DCC License Condition, why is this a mod

SSC

Remained neutral

Updated no sooner than 48 hours & no later than 23 days after I&C

Reporting requirement is captured within current PCO reporting

DCC currently does this & new DSP has requirement to do it

SMKI PMA

Supposed to be included in the new DSP

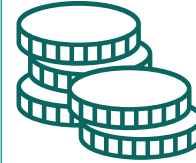
Why this mod is needed to 'cover' until new DSP is ready

■ MP268: Assessment of Change



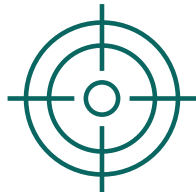
Impacted Parties

- Suppliers
- Electricity Network Operators
- DCC



Costs

- SECAS implementation costs



Target Release

- Nov 2025 SEC Release
- Will be included in the new DSP



Benefits

- Explicit instructions and criteria when Certificate replacement should occur

SEC Objective (f)

(f) ensure the protection of Data and the security of Data and Systems in operation of this Code

■ MP268: Recommendations

- **DETERMINE** whether MP268 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP268 should be progressed as a Self-Governance Modification



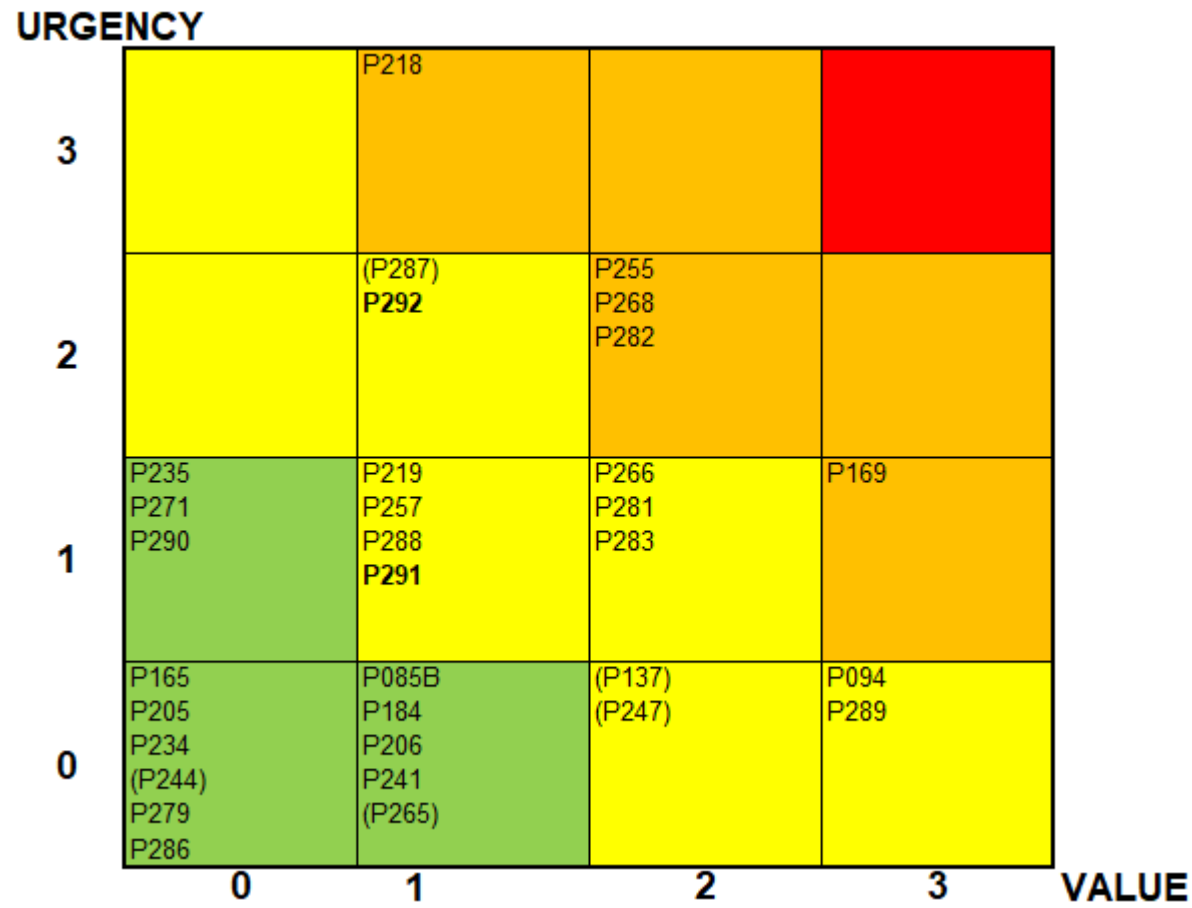
Agenda item 4

SEC Modification Timetables
Ben Giblin (SECAS)

■ SEC Modification Timetables

Ben Giblin

Summary and Matrix



- 32 Active Modifications
- Five Modifications on hold
- Scoping three potential new issues
- MP285 implemented on 24/04/2025
- DP291 (V1 + U1) and DP292 (V1 + U2) raised

■ High priority mods

MP169 'Managing SEC Obligations and the Consumer's right to refuse a Smart Meter'

- DCC accepted the Impact Assessment against the existing DSP on 12 May, with an expected return date of 27 June.
- SECAS is waiting for confirmation of when the Preliminary Assessment can be requested against the new DSP.

DP218 'Review of the SEC Charging Methodology'

- SECAS is waiting for DCC to publish the consultation responses summary before deciding on the next steps.

MP282 'Removal of Registration Check for Suppliers using SR8.9 targeting SMETS2+ CHF'

- SECAS received no responses to the MRC.
- Will be presented to the Change Board on 21 May and if approved will be implemented in the June 2025 SEC Release.

■ On hold

Removed from 'On Hold' List

- MP085B – SECAS is investigating issues with firmware which was expected to implement MP085A functionality.
- MP094 - Requires a business requirements workshop before the Preliminary Assessment can be requested.

On Hold List

- MP137 – Dependent on whether the business requirements are delivered in FSM.
- MP244, MP247 and MP265 – Require a Preliminary Assessment against the new DSP.

DCC Assessments

Modification	Submission Group	Priority	Rationale
MP169 'Managing SEC Obligations and the Consumers right to refuse a Smart Meter'	1	HIGH	Requires a second DCC Impact Assessment before the Modification Report can be finalised. A high priority modification with the most industry interest.
MP094 'Supporting prepayment customers in no SMWAN scenarios'	1	MEDIUM	Older modification which requires a cost in order to move through the modification process. Requirements yet to be finalised for submission.
MP281 'Install Codes in the SMI'	1	MEDIUM	Requirements developed – ready for submission.

DCC Assessments

Modification	Submission Group	Priority	Rationale
MP265 'Implementing ADT changes in response to a Security Incident'	2	MEDIUM	Requirements have been drafted. This modification has a security impact so should be progressed.
MP247 'Future Dating of Service Requests for SMETS1 Devices'	2	MEDIUM	Requirements ready for submission.
MP184 'Increase Smart Capability of SMETS2 Twin Element ESME'	2	LOW	Older modification. Requirements ready but still details to be finalised with Device Manufacturers.

DCC Assessments

Modification	Submission Group	Priority	Rationale
MP255 'WAN issues during Smart Meter installations'	3	HIGH	Lots of industry interest but requirements not developed.
MP244 'Device Alerts for Smart Meter Credit Replenishment'	3	LOW	Requirements ready but a lower priority modification.
DP257 'DCC Management of Duplicate Messages'	4	MEDIUM	Requirements not ready. No RWS scheduled yet.
MP235 'Enhanced Meter Data access for Other Users'	4	LOW	Requirements need to be examined following PSC comment on sensitive data.
MP287 'Access to historic GSME battery Alerts'	4	MEDIUM	DCC are examining whether they can alter existing reporting to cover the Alerts the Proposer could like access to.

Issues

Title	Description	Progress/Next Steps
Adverse Weather Deferring DCC Planned Maintenance	Seeks to address issues faced by industry (particularly DNO's) caused by adverse weather.	SECAS are looking to make an initial determination on the size and scale of the impacts of deferring a planned maintenance (both operationally and financially) for DNOs, the DCC, and their respective dependant parties.
Additional Operational Metrics	Suppliers would like further updates linked to MP242.	SEC modification and "Code Required Documents Route" explored. Current proposal is for method of data provision yet to be determined.
Network Operators to receive 3 Supplier Alerts	Network Operators would like visibility of these non-mandated Supplier Alerts to identify safety issues.	Discussed at May Issues Group, with the likelihood this will be raised at the June CSC meeting.

■ Recommendations

- **NOTE** the proposed schedule for submission of DCC Assessments.



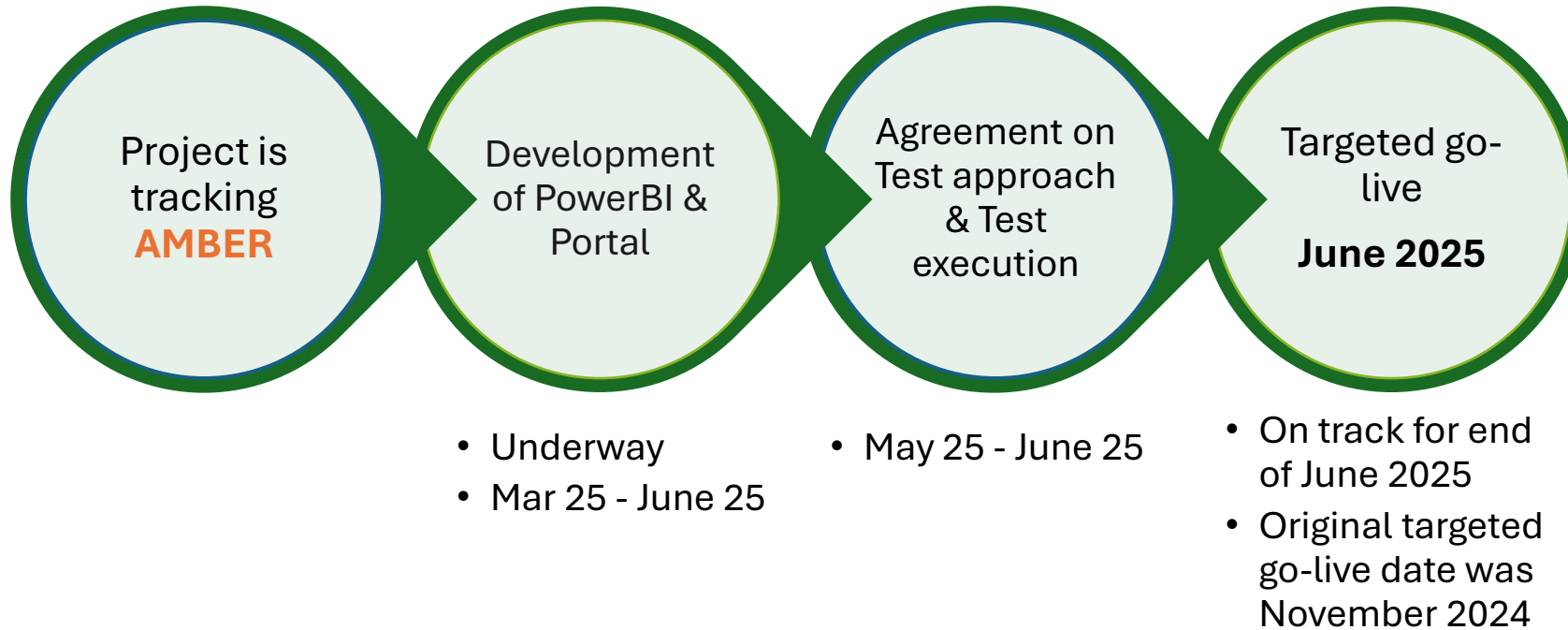
Agenda item 5

Post Decision Delivery
Khaleda Hussain (SECAS)

■ Post Decision Delivery

MP176

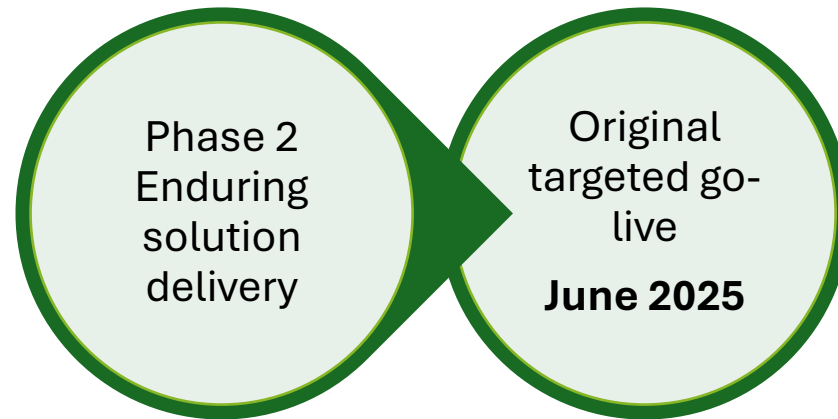
Customer
Analytics
Reporting



■ Post Decision Delivery

MP239

Enduring Solution for
Resolving SMETS2
Device Certificate
Misalignment Issue

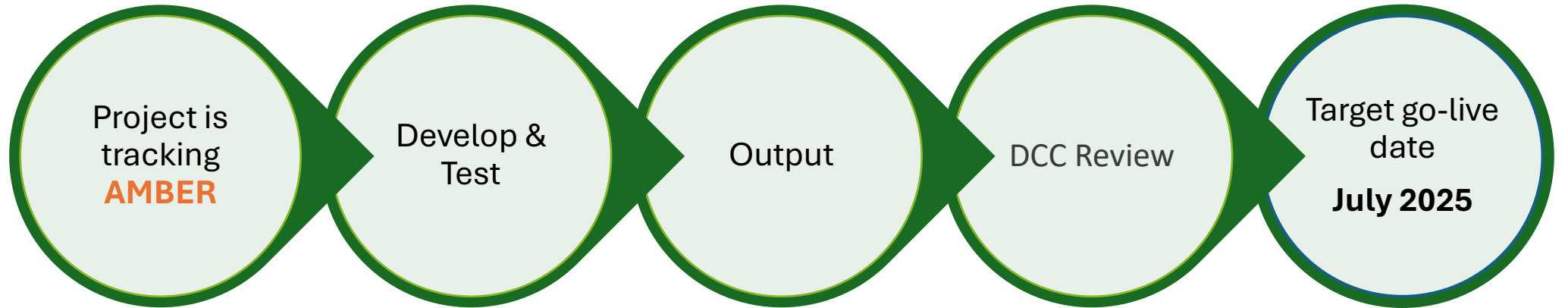


- Underway
- Go-live date is 26th June 2025

■ Post Decision Delivery

MP242

Change to
Operational Metrics
to Measure on
Success



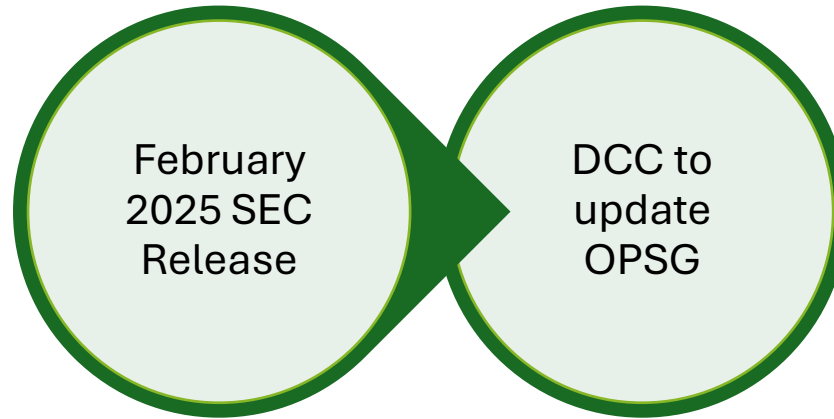
- Original targeted go-live date was November 2024
- Producing operational metrics for business processes
- Processes include CoS, I&C, Top up Device, Tariff, Pre-Payment, Meter Reads & Ancillary
- On track for Update Device Firmware
- *Meter Reads due to start May-June 25*
- On track for Tariff and Firmware
- *Meter Reads due to start June 25*
- On track for Pre-payment, Tariff and Firmware
- *Meter Reads due to start Jun-Jul 25*
- *Ancillary activity in Apr & Jul 25*
- On track to go-live second week of July 2025
- **Was due June 2025**

MP242 was implemented on 12 November 2024 in an Ad-Hoc SEC Release.

■ Post Decision Delivery

MP274

Requirement for DCC
Users to set TPS
configurations



- Modification was implemented on 27 February 2025
- DCC to update OPSG on Users that have engaged to set up TPS limits
- DCC will not be taking this to OPSG this month

■ Recommendations

The CSC is requested to:

- **NOTE** the updates on the Post Decision Delivery referenced in these slides



Agenda item 6

SEC Releases Update
Liz Woods (SECAS)

BRAG status key

Status	Justification
Red	The targeted release date allows for no extension to the modification timeline, or allows for delay only if subsequent steps are expedited.
Amber	The targeted release date allows for an extension to the modification timeline of up to two months.
Green	The targeted release date allows for an extension to the modification timeline of over two months.
Blue	The modification has been approved for implementation.
	This modification is DCC System impacting.
	This modification is not DCC Total System impacting, however these changes will require amendments to DCC reporting systems, SharePoint, business processes etc.

DSP Re-Procurement (1/2)



DCC has reprocured the Data Service Provider (DSP) function

- Contracts are now signed, expected new DSP will go live from late 2028

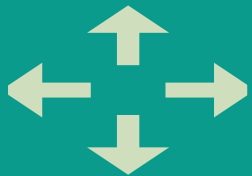


‘mobilisation period’ before any PIAs/FIAs against the new DSP can begin



If assessments can be requested from end of May 2025

- Likely that any System changes can be scheduled for 2028 implementation



Several changes in flight require either a PIA, FIA or new Assessment

- Cannot be implemented before 2026 & require a new benefits assessment

DSP Re-Procurement (2/2)

Modifications awaiting DCC Assessments			
Mod No.	Mod Name	Submission Group	SECAS Priority
MP169	Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter	1	HIGH
MP094	Supporting prepayment customers in no SMWAN scenarios	1	MEDIUM
MP281	Install Codes in the SMI	1	MEDIUM
MP265	Implementing ADT changes in response to a Security Incident	2	MEDIUM
MP247	Future Dating of Service Requests for SMETS1 Devices	2	MEDIUM
MP184	Increase Smart Capability of SMETS2 Twin Element ESME	2	LOW
MP255	WAN issues during Smart Meter installations	3	HIGH
MP244	Device Alerts for Smart Meter Credit Replenishment	3	LOW
MP287	Access to historic GSME battery Alerts	4	MEDIUM
DP257	DCC Management of Duplicate Messages	4	MEDIUM
MP235	Enhanced Meter Data access for Other Users	4	LOW

■ Delays to FSM

The DCC has made SECAS aware that FSM (Future Services Management) has been delayed. This will affect any modifications awaiting implementation that require changes to FSM and any modifications currently in flight that require changes to FSM.

Modifications awaiting FSM		
Mod No.	Mod Name	Impact
MP239	Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue	Approved for inclusion into the June 2025 SEC Release and has been advised will be incorporated into FSM once live.
MP252	Amending the process for Communications Hub returns	Solution approved by Change Board in Feb 2025 includes delivery into FSM. Delivery options are being discussed with industry in order to ensure the Proposed Solution is available by implementation in the November 2025 SEC Release.
MP137	Sharing information on Defects and Issues	Dependent on whether the business requirements are delivered in FSM.

June 2025 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
MP239	Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue	 Data Communications Company
MP246	DCC User access to metadata via the DCC Self-Service Interface	 Data Communications Company

Targeted Modifications		
Mod No.	Mod Name	Status
MP271	SEC Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents	
MP279	June 2025 SEC Releases & DUIS Housekeeping Changes	
MP282	Removal of Registration Check for Suppliers Using SR8.9 Targeting SMETS2+ CHF	

MP283 has been removed to the scope of this Release since the April 2025 CSC meeting.

MP271 is currently with the Authority for determination with an expected decision date by 16 May 2025.

■ November 2025 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
MP252	Amending the process for Communications Hub returns	

Targeted Modifications		
Mod No.	Mod Name	Status
MP268	Certificate rotation and expired Certificates	
MP283	Data Breach Reporting	
MP286	Establishment of the Privacy Sub-Committee into the SEC	

MP283 has been added to the scope of this Release since the April 2025 CSC meeting.
There has been a change to MP268 to note it will no longer be DCC System impacting.

February 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
-	-	-

Targeted Modifications		
Mod No.	Mod Name	Status
-	-	-

There are currently no modifications targeted for the February 2026 SEC Release.

June 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
-	-	-

Targeted Modifications		
Mod No.	Mod Name	Status
-	-	-

There are currently no modifications targeted for the June 2026 SEC Release.

Releases from June 2026 SEC Release and onwards may be impacted by DSP re-procurement.

■ November 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
-	-	-

Targeted Modifications		
Mod No.	Mod Name	Status
-	-	-

There are currently no modifications targeted for the November 2026 SEC Release.

Releases from June 2026 SEC Release and onwards may be impacted by DSP re-procurement.

■ Ad hoc SEC Releases

Targeted Modifications		
Mod No.	Mod Name	Status
MP219	Access Consumption Data on behalf of SEC Parties	May 2025
MP241	Interoperability Checker Update	December 2025

MP219 is currently with the Authority for determination with an expected decision date by 16 May 2025.

■ Recommendations

The CSC is requested to:

- **NOTE** the updates on the SEC Releases referenced in these slides.



Agenda item 7

Any Other Business

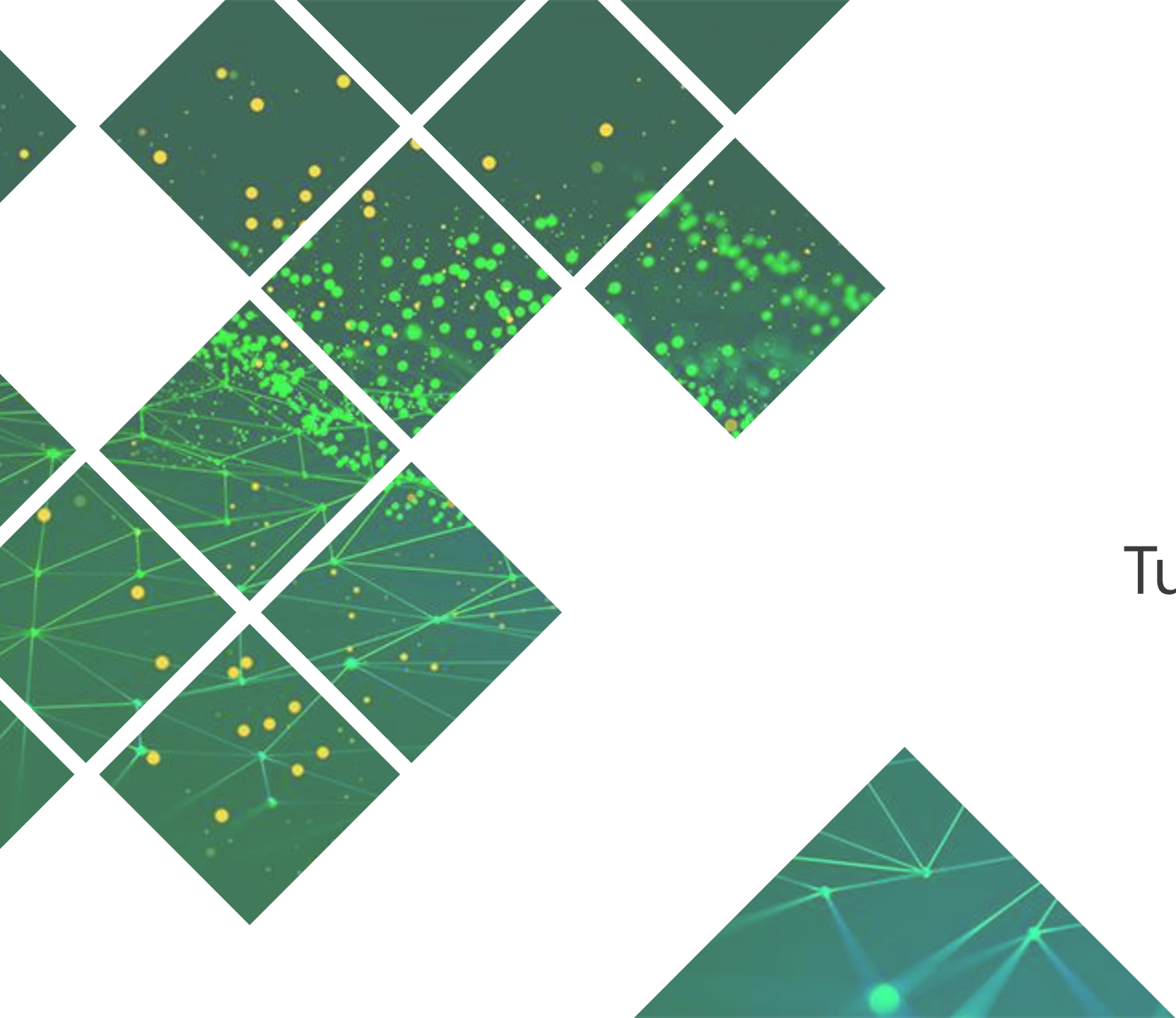
YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

**Want know more about SEC Change and Modifications?
Why not listen to our Modcasts?!**

Available to listen on our [website](#) or [LinkedIn](#)



Thank you for attending

Next meeting:
Tuesday 17 June 2025