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MP290

‘Incorporation of Category 3 Issue Resolution Proposal into the SEC – Batch 11 and GBCS Changes’

Modification Report

Version 0.3

10 June 2025



About this document

This document is a Modification Report. It 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 document also has two annexes:

- **Annex A** contains the DCC Preliminary Impact Assessment Report
- **Annex B** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

Contact

If you have any questions on this modification, please contact:

Marc Rhodes

020 3922 0750

Marc.Rhodes@gemserv.com

1. Summary

This proposal has been raised by David Walsh from the Data Communications Company (DCC).

Issue Resolution Proposals (IRPs) identify and resolve issues in the Technical Specifications documents of the SEC. These issues have been identified by a variety of means and raised for one of the following reasons.

- A request for clarification of any aspect of the documentation;
- A request to resolve a suspected or confirmed Technical Specifications defect; or
- A change identified by the Department for Energy Security & Net Zero (DESNZ) to implement a policy intent.

These issues are then added to an issues log whilst a potential resolution is developed. The Technical Specification Issue Resolution Subgroup (TSIRS) determine all potential solutions and will request these be progressed as part of a Modification Proposal for implementation into the SEC. Once the TSIRS has determined that the issue can be closed, the IRPs will be passed to Smart Energy Code Administrator and Secretariat (SECAS) to begin the modification process.

The DCC have conducted an initial assessment in order to categorise the IRP and identify the correct Impact Assessment path for the Modification process. The categories are outlined as follows:

- Category 1 - DCC core system impacting, requiring a code / system change.
- Category 2 - Non-DCC core system impacting, no code / system change required, just has a testing / testing tool impact.
- Category 3 - Non-DCC core system impacting, no code / system change required.

IRPs are packaged into SEC Modifications as part of the SEC Release process. Implementation of these IRPs will ensure Devices operate as intended.

These changes will impact Users that are involved with the application of replacement Device Certificates.

IRP665 Proposes a text change to clarify when Certification Path Validation (CPV) should be applied.

This Modification also included an update to the NGNM (Non-GBCS Non-Mandated) Alerts table into the Great Britain Companion Specification (GBCS). However, during the progression of the modification the timescales for implementation were identified by the DCC as unfeasible so these were removed from the final solution and will be progressed as a separate modification at a future date.

This modification is targeted for the November 2025 SEC Release. There are no anticipated costs associated with this modification outside that of The Smart Energy Code Administrator and Secretariat (SECAS) implementation costs. This modification is a Self-Governance modification.

2. Issue

What are the current arrangements?

IRPs identify issues within SEC Technical Specification documents and put forward a solution to the identified problem. In the early stages of the Smart Metering Implementation Program (SMIP), the Department for Business, Energy and Industrial Strategy (BEIS) (which has now become DESNZ) took the lead in developing the SEC Technical Specifications. As part of this, DESNZ also took responsibility for receiving and responding to issues raised either internally, by the DCC, or by other interested Parties. Since its inception, several hundred issues have been raised in relation to Technical Specifications through the TSIRS. In some cases, these queries have been resolved by providing an explanation of the Specifications, whilst others have resulted in proposed amendments to the Specifications in the form of IRPs. The IRP solutions identified have been developed by the TSIRS.

What is the issue?

The individual IRP details for this modification can be found on the SECAS website link [here](#). This document reflects the issue, background information and details of the solution that has been discussed and agreed at the TSIRS. The IRP included in this proposal, listed below, requires changes to GBCS with initial key impacts identified below.

IRP665

Any Certificates which are applied to Devices during manufacturing have been validated and are stored as credentials in the Trust Anchor Cells in the Device. If these Certificates need replacing during commissioning or if the Certificate credentials expire a replacement Certificate will be required. Replacements certificates will be applied through the 'update security credentials' command and will be subject to CPV.

This process only applies to replacement certificates as any original certificates in the Trust Anchor Cells would have been previously validated. Ensuring that CPV is only applied to replacement Certificates avoids any unnecessary time or effort.

The aim of this proposed change is to emphasise that CPV only applies to the replacement Certificates and does not apply under any circumstance to existing Certificates held as credentials in Trust Anchor Cells.

NGNM (Non-GBCS Non-Mandated) Alerts table

Device Alerts are unsolicited messages sent by Devices to DCC Users. The GBCS lists and defines the structure of these Alerts, distinguishing between mandated and non-mandated Alerts.

GBCS Parse software allows any new non-mandated Alerts of the right format (as specified by the GBCS) sent by Devices to be passed to the DCC User. These new non-mandated Alerts have been captured in the GBCS within Table 16.2 following the November 2021 SEC Release. Any new non-mandated Alerts will be captured temporarily in a register until they are adopted by the SEC.

Due to insufficient implementation timescales the NGNM Alerts Table update has been removed from this modification. This update will be included in a separate modification at a future date.

What is the impact this is having?

The IRP addresses discrepancies within the Technical Specifications that require correcting, or additional clarification. They have caused confusion amongst some SEC Parties and may continue to do so if not amended. Therefore, the TSIRS has discussed these issues and agreed that improvements are required to the Technical Specifications to address this.

Impact on consumers

This change should not have an impact on consumers.

3. Solution

Proposed Solution

IRP665

A wording change to ensure clarity that CPV occurs only when Service Reference Variant (SRV) 6.15.1 Update Security Credentials Command is received and applies only to the replacement Certificates contained within the Command.

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

The Certification Path Validation (CPV) process only applies to replacement certificates as any original Certificates in the Trust Anchor Cells would have been previously validated. Ensuring that CPV is only applied to replacement Certificates avoids any unnecessary time or effort for Suppliers.

DCC Systems

The full impacts on DCC Systems can be found in the DCC Preliminary Impact Assessment (PIA) response in Annex A.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Schedule 8 'GB Companion Specification' (GBCS)

Devices

This Modification will have no impact on Devices.

Consumers

This Modification will have no impact on consumers.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

This modification has no associated DCC costs.

SECAS costs

The estimated SECAS implementation costs to implement this 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

SECAS does not anticipate any SEC Party costs as a result of this Modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **6 November 2025** (November 2025 SEC Release) if a decision to approve is received on or before 23 October 2025; or
- **5 November 2026** (November 2026 SEC Release) if a decision to approve is received after 23 October 2025 but on or before 13 October 2025.

As the changes impact a Technical Specification, they must be implemented in a SEC Release that includes an uplift to the Technical Specifications to prevent more than one change to the Technical Specifications in a calendar year. The November 2025 SEC Release is the next SEC Systems Release that this modification can be included in which is expected to include Technical Specification changes. If, following a decision and allowing enough lead time, an earlier Release made updates to the Technical Specifications this modification may be included in that Release.

7. Assessment of the proposal

Sub-Committee input

SECAS has engaged with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	None
PSC	None
SMKI PMA	None
SSC	Understand any potential security risks posed by this modification
TABASC	Understand any potential technical impacts as a result of this modification proposal
TAG	None

8. Case for change

Business case

Approval of the modification

IRP665 will ensure that there is clarity outlining when the CPV process needs to be applied. This will avoid any unnecessary time or effort for Suppliers.

Against approval of the modification

No comments have been made against the approval of the modification.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this Modification better facilitates SEC Objectives (a). Providing clarity around when the CPV process should be applied will save Suppliers unnecessary time or effort when applying Device Certificates.

Industry views

The SSC and TABASC could not see any issues arising from the implementation of this Modification.

Views against the consumer areas

Improved safety and reliability

This modification will be neutral against safety and security for consumers.

Lower bills than would otherwise be the case

This modification will be neutral against this consumer benefit area.

Reduced environmental damage

This modification will be neutral against this consumer benefit area.

Improved quality of service

This modification has a positive impact on improving quality of service.

Benefits for society as a whole

This modification will be neutral against this consumer benefit area.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	18 March 2025
Presented to CSC for initial comment	15 April 2025
CSC converts Draft Proposal to Modification Proposal	15 April 2025
Preliminary Assessment requested	24 April 2025
Modification discussed with TABASC	1 May 2025
Modification discussed with SSC	14 May 2025
Preliminary Assessment returned	5 June 2025
Present to CSC to receive approval for report phase	17 June 2025
<i>Modification Report Consultation</i>	<i>25 June 2025 – 9 July 2025</i>
<i>Change Board Vote</i>	<i>23 July 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
BEIS	Department for Business, Energy and Industrial Strategy
CPV	Certification Path Validation
CSC	Change Sub-Committee
DCC	Data Communications Company
DESNZ	Department for Energy Security & Net Zero
GBCS	Great Britain Companion Specification
IRP	Issue Resolution Proposals
NGNM	Non-GBCS Non-Mandated
OPSG	Operations Group
PIA	Preliminary Impact Assessment
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMIP	Smart Metering Implementation Program
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SRV	Service Reference Variant

Glossary	
Acronym	Full term
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
TSIRS	Technical Specification Issue Resolution Subgroup