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SEC Change Sub-Committee Meeting 79_1609

16 September 2025, 10:00 – 12:40

Teleconference

SECCSC_79_1609 – Final Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers	Emma Johnson (EJ)	British Gas
Large Suppliers	Emslie Law (EL)	OVO
Small Suppliers	Daniel Davies (DD)	ESG Global
Other SEC Parties	Philip Doyle (PD)	Reverve Ltd
Other SEC Parties	Gerd Busker (GB)	Presciense
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution

<table>
<tr><th colspan="6">Other Participants</th></tr>
<tr><th colspan="6">DCC</th></tr>
<tr><td colspan="3">Bradley Baker (BB)</td><td colspan="3">David Walsh (DW)</td></tr>
<tr><td colspan="3">Karim Kanso (KK)</td><td colspan="3">Martins Atoyebi (MA)</td></tr>
<tr><td colspan="3">Graeme Milligan (GM)</td><td colspan="3"></td></tr>
<tr><th colspan="6">Consumer Scotland</th></tr>
<tr><td colspan="3">Diarmuid Cowan (DC)</td><td colspan="3"></td></tr>
<tr><th colspan="6">Ofgem</th></tr>
<tr><td colspan="3">Ian Chalfon (IC)</td><td colspan="3">Cristina Ullastre (CU)</td></tr>
<tr><th colspan="6">Observers</th></tr>
<tr><td colspan="3">Diane Simner (DS) (e gas and electricity)</td><td colspan="3">Steve Blackler (SB) (e gas and electricity)</td></tr>
<tr><td colspan="3">Ian Lovatt (IL) (Chameleon Technology)</td><td colspan="3"></td></tr>
<tr><th colspan="6">SECCo</th></tr>
<tr><td colspan="3">Robin Healey (SECCo)</td><td colspan="3"></td></tr>
<tr><th colspan="6">Smart Energy Code Administrator and Secretariat (SECAS)</th></tr>
<tr><td colspan="2">Abi Obadan (AO)
Meeting Secretary</td><td colspan="2">Khaleda Hussain (KH)</td><td colspan="2">Lydia Bentley (LB)</td></tr>
<tr><td colspan="2">Georgie Severin (GS)</td><td colspan="2">Marc Rhodes (MR)</td><td colspan="2">Simon Grimwood (SG)</td></tr>
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Apologies:

Representing	CSC Members	Organisation
Consumers	Caroline Farquhar	Citizens Advice

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the CSC meeting.

SECAS advised that no comments had been raised on the last meeting minutes. The CSC **APPROVED** the minutes as final.

2. Actions Outstanding

Action Reference	Action
76/02	SECAS to give an update on the impact of Consumer Consent workstreams
SECAS gave an update on Consumer Consent and how it might impact some changes. SECAS and the CSC have agreed that this should be a standing agenda item until further notice. Meeting update 16/09/2025: SECAS (LB) provided an update on the Consumer Consent Workstreams. They confirmed their ongoing involvement in the Governance Implementation Working Group, ensuring alignment between modifications and programme impacts. SECAS (LB) noted that they will provide ad hoc updates going forward and this will be a standing item on future agendas. **Status:** Closed.	
76/04	SECCo (RH) to confirm Paper Classification approach with SECAS Governance Team
Discussions are ongoing and RH will report back in September. Meeting update 16/09/2025: SECCo (RH) informed the CSC that they had undertaken a comprehensive review of the Panel Information Policy and paper classification practices. SECCo noted that they had identified inconsistencies in how authors apply classifications and proposed a new process to agree classifications during agenda-setting meetings. This will ensure better visibility and reduce the need for multiple sets of minutes. A CSC member (EJ)welcomed this update and requested that SECCo's explanation be included in the minutes. This action will remain open to monitor implementation effectiveness. **Status:** Open.	

3. SEC Modification Progression

DP299 'Update Citizens Advice Scotland to Consumer Scotland'

SECAS (AB) presented a summary of DP299 'Update Citizens Advice Scotland to Consumer Scotland', a fast-track modification raised on behalf of Citizens Advice noting it's deferral from the previous meeting due to questions about the Panel Terms of Reference. SECAS (AB) again reiterated that the change was a simple find and replace change in the Smart Energy Code (SEC), updating references from "Citizens Advice Scotland" to "Consumer Scotland" following legislative changes. SECAS (AB) then addressed concerns raised previously about the number of consumer representatives on the Panel, confirming that the SEC already allowed for two consumer members and that the Panel Terms of Reference (ToR) had been updated to reflect this. SECAS (AB) confirmed that DP299 would have no direct cost or impact on Parties and would be implemented through an ad hoc release 15 working days after approval subject to no referrals.

The CSC:

- **AGREED** that DP299 should be progressed as a Fast Track Modification;
- **AGREED** that this Modification Proposal (MP299) should be **APPROVED** as a Fast Track Modification and;
- **AGREED** with the rationale for this decision relating to the General SEC Objectives.

DP300 'Additional Operational Metrics to Measure on Success'

SECAS (LB) introduced DP300 'Additional Operational Metrics to Measure on Success' which proposed to build on the implementation of MP242 'Change to Operational Metrics to Measure on Success - Smart Energy Code' which had introduced a new reporting model for seven Business Processes. SECAS (LB) noted that DP300 proposes to add four additional Business Processes to this existing model, increasing its total to eleven. DP300 also seeks to establish a mechanism for adding future processes to the reporting framework.

A CSC member (EJ) queried the prioritisation of this modification as low priority noting that it should be higher. SECAS (LB) clarified that MP242 had introduced a novel framework, whereas DP300 was an extension, hence the lower score. However, following this feedback SECAS (LB) agreed to increase its prioritisation to high, based on an urgency of one, and a value of three.

Another member (DD) noted the need for clearer wording in the Modification Report and highlighted the need for clarification around its cost implications particularly in relation to the responsible parties. SECAS (LB) noted this feedback further explaining that the value of the modification lies in its broad benefit to Suppliers. SECAS (LB) then agreed that the report needed to better reflect that a SEC route is being pursued to mutualise costs rather than having one party bear all costs alone. Moreover, SECAS (LB) noted that they had attempted to explain this in Section 3 of the Modification Report under the "Determination of Mechanism of Change" subheading. but accepted the feedback and committed to making the wording clearer during refinement.

The CSC:

- **AGREED** that the issue and impact DP300 is having is clearly defined and understood;
- **AGREED** that DP300 should be converted to a Modification Proposal;
- **AGREED** that MP300 should be progressed to the Refinement Process and;
- **APPROVED** the first package of work and the timetable for MP300.

DP301 'Review of Additional Registration Data (Gas Transporters)'

SECAS presented information on DP301 'Review of Additional Registration Data (Gas Transporters)' which seeks to remove the obligation on Gas Transporters to provide additional registration data to the DCC under Section E – 'Registration Data' of the Smart Energy Code (SEC). SECAS (LB) confirmed that DP301 is being progressed as a cross-code modification alongside the Retail Energy Code (REC) Issue I0262.

The DCC (DW) then raised a concern regarding the number of times Gas Transporters are referenced in the DCC User Interface Specification (DUIS) and highlighted that if Gas Transporters were to leave the SEC, the DUIS may need to be updated to remove them as an Eligible User Role. The DCC further noted that this could impact operational performance and potentially have cost implications. SECAS (AB) clarified that they did not believe that this would be the case as the modification is not seeking to incur costs and clarified that Gas Transporters rights to be eligible would still exist, however their obligation to be eligible would be removed.

The DCC then queried how the derogation clause in the Gas Transporter Licence would be monitored if Gas Transporters were allowed to leave the SEC. SECAS (LB) confirmed this would be investigated further with Ofgem to ensure that no party would be left non-compliant.

Another CSC member (DD) highlighted that Suppliers have obligations to populate gas proxy functions with Gas Transporter data, which could be affected if Gas Transporters leave the SEC. They also noted that this issue had been discussed at a Design Release Forum (DRF) meeting in May 2025, where it was suggested that the DCC may raise a SEC Modification to remove Supplier obligations. They then queried whether the Gas Transporter Licence would also need to be changed if SEC accession was no longer required and highlighted the importance of knowing the impact this Modification will have on Gas Transporters if implemented. SECAS (LB) acknowledged this feedback and agreed to investigate this further, particularly in relation to the impact this modification would have on Suppliers.

SECAS (LB) noted that they are engaging with Ofgem to ensure that any changes do not result in non-compliance with Gas Transporter Licence Conditions and the CSC agreed with the recommendations and highlighted the need for addressing its wider impact during the Refinement Process.

The CSC:

- **AGREED** that the issue and impact DP301 is having is clearly defined and understood;
- **AGREED** that DP301 should be converted to a Modification Proposal;
- **AGREED** that MP301 should be progressed to the Refinement Process and;
- **APPROVED** the first package of work and the timetable for MP301.

DP302 'Supplier Alerts for ENOs'

SECAS presented information on DP302 'Supplier Alerts for ENOs' which seeks to provide ENOs access to three non-mandated Supplier Alerts.

A CSC member (EL) queried the modification prioritisation and raised concerns about Device behaviour and noted that changing who receives Alerts based on Trust Anchor Cells would require firmware updates which are costly. They also further explained that Alerts were not mandated previously due to lack of standardisation across Devices and that mandating them now would be technically and commercially challenging. SECAS (GS) clarified that this modification does not seek to mandate the Alerts, only to allow visibility where they already exist. They further confirmed that the Technical and Business Sub-Committee (TABASC) and Operations Sub-Group (OPSG) would be engaged in order to explore technical feasibility and agreed that the Refinement Process will proceed with caution and full awareness of the highlighted challenges.

Another CSC member (DD) then proposed linking MP291 'DNO Alerts to Suppliers' to this modification and assess Alert availability across Devices. SECAS (GS) confirmed that they are managing both DP302 and MP291 and is treating them as part of a broader Alert visibility initiative.

The CSC agreed to progress DP302 to Refinement, with SECAS to investigate Alert behaviour, Manufacturer support and potential overlaps with other modifications. They also agreed to investigate how many Devices currently support these Alerts and whether Suppliers have disabled them. Furthermore, they confirmed that Manufacturer Data and Alert status would be reviewed during the Refinement Process.

The CSC:

- **AGREED** that the issue and impact DP302 is having is clearly defined and understood;
- **AGREED** that DP302 should be converted to a Modification Proposal;
- **AGREED** that MP302 should be progressed to the Refinement Process and;
- **APPROVED** the first package of work and the timetable for MP302.

DP303 ‘Aligning DCC Certificate processes with SMKI standards’

SECAS (SG) presented information on DP303 'Aligning DCC Certificate processes with SMKI standards' a text-only change to align SEC documents with current DCC certificate validation processes.

A CSC member (IL) raised concerns about the potential impact on Certificate Signing Request (CSR) processing. The DCC (KK) clarified that the change would only align Smart Energy Code (SEC) wording with existing practice and that there will be no changes to CSR validation or certificate signing behaviour. SECAS (SG) further confirmed that this modification will be reviewed by the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and the CSC noted that they supported the recommendations presented.

The CSC:

AGREED that the issue and impact DP303 is having is clearly defined and understood and;

AGREED that DP303 should remain in the Development Stage.

DP304 'Scheduling Services for SMETS1 Devices (SRV4.3)'

SECAS presented information on DP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)' which proposed enabling SRV 4.3 (retrieving prepayment balances) to be schedulable for SMETS1 Devices to reduce Smart Metering Systems (SMS) wake-up messages and associated costs.

SECAS (AB) noted that the DCC estimated this change will deliver significant savings up until the end of March 2029 and further savings up until March 2032. A CSC member (EL) queried whether the estimated cost savings were instead cost avoidance and another CSC member (EJ) queried whether there is any financial benefit to Suppliers and whether costs would be passed onto Suppliers. SECAS (AB) noted this feedback and agreed to investigate member concerns further. SECAS (AB) also agreed to clarify whether savings would be passed onto Users.

The CSC:

- **AGREED** that the issue and impact DP301 is having is clearly defined and understood;
- **AGREED** that DP304 should be converted to a Modification Proposal;
- **AGREED** that MP304 should be progressed to the Refinement Process and;
- **APPROVED** the first package of work and the expedited timetable for MP304.

4. SEC Modification Timetables

SECAS (KH) provided an update on the timetables for Modification Proposals, providing an updated Prioritisation Matrix and summaries of high and very high priority modifications. SECAS (KH) noted the earlier updates and agreed to amend prioritisation scores for MP300 'Additional Operational Metrics to Measure on Success' as discussed earlier in the meeting.

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 and reported that MP242 'Change to Operational Metrics to Measure on Success' noting that MP242 had been delayed due to data complexity. SECAS (KH) added that the DCC will present an update at the OPSG 149 meeting on 22 September 2025, with the first report expected on 14 October 2025.

The CSC:

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

6. SEC Releases Update

SECAS (GS) presented an update on the SEC Releases confirming that the November 2025 Release will include the following SEC Modifications:

- MP252 'Amending the process for Communications Hub returns', MP268 'Certificate rotation and expired Certificates', MP286 'Establishment of the Privacy Sub-Committee into the SEC', MP290 'Incorporation of Category 3 Issue Resolution Proposal into the SEC – Batch 11 and GBCS Changes' approved;
- MP283 'Data Breach Reporting' and MP298 'Enhancements to SEC Appendix AW – Performance Assurance' to be presented to Change Board on 24 September 2025 and;
- DP297 'Housekeeping for November 2025 SEC Release' to be fast-tracked at the October 2025.

SECAS noted that there will be an ad hoc Release MP299 'Update Citizens Advice Scotland to Consumer Scotland' has been approved for implementation on 7 October 2025. A CSC member (DD) queried the reasoning behind why MP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)' was not included on the slide as targeting the November 2026 SEC Release. SECAS (AB) noted that they could not confirm its targeted Release date as they did not know how long it would take to reach implementation. SECAS (AB) further added that if it does not make the November 2026 Release then the Change Board will need to consider if it should be implemented in DSP2 only.

The CSC **NOTED** the updates on the SEC Releases

7. SECCo Update

SECCo (RH) presented a comprehensive review of the Panel Information Policy and paper classification practices. SECCo noted that they had identified inconsistencies in how authors apply classifications and proposed a new process to agree classifications during agenda-setting meetings. SECCo noted that this will ensure better visibility and reduce the need for multiple sets of minutes. A CSC member (EJ) welcomed this update and requested that SECCo’s explanation be included in the minutes. This action will remain open to monitor implementation effectiveness.

The CSC **NOTED** the update.

8. Consumer Consent Update

SECAS (LB) provided an update on the Consumer Consent Workstreams. SECAS confirmed their ongoing involvement in the Governance Implementation Working Group, ensuring alignment between modifications and programme impacts. SECAS (LB) noted that they will provide ad hoc updates going forward and that this will be a standing item in future agendas.

The CSC **NOTED** the update.

9. June 2025 SEC Release Costs

SECAS (AB) presented the June 2025 SEC Release Costs on behalf of the DCC. SECAS presented the total cost breakdown for the June 2025 SEC Release, which included Design, Build and Pre- Integration Testing (PIT) costs for two SEC modifications and Regression Testing costs. The CSC acknowledged the reduction in User Integration Testing (UIT) duration as a positive outcome of previous CSC scrutiny and SECAS (AB) committed to making future cost presentations clearer, especially regarding regression testing estimates.

The CSC **NOTED** the update.

10. Any other business (AOB)

SECAS (AB) noted that the meeting dates for 2026 will be presented at the next CSC meeting 80 on 21 October 2025 and that the CSC meetings will continue to be held on the third Tuesday of each month.

There was no further business from members.

Next Meeting: 21 October 2025