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DP299

‘Update Citizens Advice Scotland to Consumer Scotland’

Modification Report

Version 0.2

9 September 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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Contact

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

Ali Beard

020 3970 1105

alison.beard@gemserv.com

Commented [GS1]: Should it be v1.0 as it's going for Fast-Track vote at CSC? @Alison Beard



1. Summary

This proposal has been raised by Caroline Farquhar from Citizens Advice.

Citizens Advice Scotland's Energy Consumer advocacy functions dealing with industry have transferred to Consumer Scotland, but both bodies remain in existence.

The Proposed Solution is to update references in the Smart Energy Code (SEC) from Citizens Advice Scotland to Consumer Scotland.

This modification will have no direct impacts on any SEC Parties but will give greater clarity and transparency to the SEC Documents. Implementation costs are limited to Smart Energy Code Administrator & Secretariat (SECAS) time and effort to update the SEC. SECAS is targeting this Draft Proposal for implementation in the November 2025 SEC Release. This is a Self-Governance modification.

2. Issue

What are the current arrangements?

The current SEC Documents contain references to Citizens Advice Scotland.

What is the issue?

Citizens Advice Scotland's Energy Consumer advocacy functions have transferred to Consumer Scotland.

What is the impact this is having?

The references to Citizens Advice Scotland are now incorrect in the context of the SEC and need to be updated. This will allow Consumer Scotland to participate in the SEC discussions and decisions, including voting at SEC Panel (once the Terms of Reference have been updated and the appropriate administrative processes have been completed).

Impact on consumers

The identified issue means that consumers in Scotland may not be fully represented in the SEC.

3. Solution

Proposed Solution

The Proposed Solution is to correct the references identified in the SEC Documents.

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

There are no direct impacts on SEC Parties from this modification. All Parties will indirectly benefit from this modification as the references within the SEC will be addressed and corrected.

Further detail about the Parties this Draft Proposal may impact will be identified as further errors and inconsistencies are identified.

DCC System

This modification does not impact the Data Communications Company (DCC) Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A - 'Definitions and Interpretation'
- Section C – 'Governance'
- Section D – 'Modification Process'
- Section H – 'DCC Services'
- Section I – 'Data Privacy'

Devices

This modification does not impact Devices.

Consumers

This modification does not impact consumers.

Other industry Codes

This modification does not impact other industry Codes.

Greenhouse gas emissions

This modification does not impact greenhouse gas emissions.

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 half a day of effort, amounting to approximately £300. 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

There are no SEC Party costs associated with this modification.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **Ad hoc SEC Release** – 15 Working Days following Change Sub-Committee Fast Track vote.

The modification needs to be implemented as soon as reasonably practicable to clarify any ambiguities. As this modification will not have impacts on SEC Parties, it is recommended for implementation as an ad hoc SEC Release, so that the Code is reflective of the updated terminology. This will avoid any confusion or misinterpretation of the Code.

7. Case for change

Business case

This modification will address inconsistencies and points of potential confusion or misinterpretation with low costs limited to SECAS time and effort.



Views against the General SEC Objectives

Proposer's views

The Proposer believes that the modification will better facilitate SEC Objective (g)¹ as it will correct errors in the SEC and lead to less confusion or interpretation.

Views against the consumer areas

Improved safety and reliability

This modification will have a neutral impact on safety and reliability.

Lower bills than would otherwise be the case

This modification will have a neutral impact on consumer bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will have a neutral impact on quality of service.

Benefits for society as a whole

This modification will have a neutral impact on benefits for society.

Final conclusions

This modification addresses inconsistencies and points of potential confusion or misinterpretation. There are no DCC costs and only a minimal SECAS cost to implement.

This Modification was presented to the Change Sub-Committee (CSC) as a Fast-Track Modification on 19 August, but the CSC requested more detail around the Panel Terms of Reference changes. As noted at the meeting the Panel changed their Terms of Reference as set out below

5.7 Composition

- The voting Panel Members shall be as follows:
- 2 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;

¹ To facilitate the efficient and transparent administration and implementation of this Code.



- 1 Member~~s~~ from the DCC;
- ~~4~~ 2 Members from Citizens Advice or Consumer Scotland;
- The Panel Chair, appointed per Section C3.5; and
- Any additional person appointed by the Panel Chair per Section C3.6

The SEC clause C3.1 states 'two persons nominated in accordance with C3.4 (the **Consumer Members**)' where C3.4 states 'The Consumer Members shall be two persons nominated by Citizens Advice or Citizens Advice Scotland by notice to the Secretariat from time to time. Citizens Advice or Citizens Advice Scotland may replace each such person from time to time by prior notice to the Secretariat.'

Therefore, the Panel changes to the Terms of Reference were not dependent on any changes to the SEC legal drafting. One CSC member noted that they had not been aware of the Panel Terms of reference changes as the document had been classified as **RED** and asked that meeting materials have their classification downgrades as much as possible to ensure transparency to SEC Parties.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	4 Jul 2025
Presented to CSC for initial comment	15 Jul 2025
CSC converted Draft Proposal to Modification Proposal	16 Sep 2025
<i>Change Sub-Committee Vote (Fast Track)</i>	<i>16 Sep 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
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat

