

Change Sub-Committee Meeting 84

17 February 2026

Meeting Recordings

- Going forward, SEC 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

Meeting Notice

Participants are reminded that the use of AI technologies by Members (Alternates) or Observers – including call recording or meeting transcription tools – is not permitted during any SEC governance meetings.

Additionally, please ensure you always adhere to the Panel Information Policy.

Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



■ Conflict of interest

Given that members have a duty to act independently, conflicts of interest should not regularly arise. Members shall have a duty to identify whether a decision presents a conflict of interest. In such cases, the Member shall absent themselves from the meeting for the purposes of that decision.

Members should act in accordance with the [SEC Probity Policy](#) and act appropriately during and outside of meetings, treat participants and organisations with respect and operate in a collaborative manner.

■ 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. SEC Releases Update
6. CSC go/no-go decision SEC Release
7. Any Other business



Agenda Item 1

Approval of previous meeting minutes
Abi Obadan (SECAS)

■ Recommendations

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



Agenda Item 2

Actions Outstanding
Ali Beard

■ Actions Outstanding

Ref	Action	Owner	Update	Status
76/04	SECCo (RH) to confirm Paper Classification approach with SECAS Governance Team	SECCo	Meeting update 20/01/2026: The CSC Chair (AB) advised that Robin Healey (RH) continues to monitor paper classifications, with the intention of downgrading where appropriate. The CSC Chair (AB) noted that RH was not present to provide an update and confirmed the action would remain open until RH can attend a future meeting and confirm that the action can be closed.	Open



Agenda item 3

SEC Modification Progression

MP234 'Addition of Public Task and Legitimate Interests into the SEC'

Lydia Bentley

Raised by Tereza Borges from N3rgy

Progress to Report Phase

LOW

■ MP234: Overview

- Currently, Consumption Data may only be accessed by a Party who has obtained **Unambiguous Consent** from the Consumer to do so.
- The Proposer would like to include additional means by which Consumption Data may be accessed.

Issue



- Access via Unambiguous Consent only prohibits the breadth and scope of services that can be offered by Parties who utilise Consumption Data.
- Consumers experiencing fuel poverty may be offered services to improve their situation by companies with enhanced data access means.

Impact



- Amend Section I 'Data Privacy' to include provisions by which Parties may access Consumption Data via the GDPR lawful bases of Legitimate Interest & Public Task.
- Amend the Privacy Controls Framework (PCF) to outline the detailed evidentiary requirements needed to access Consumption Data.

Proposed Solution



■ MP234: Proposed Solution

Section I: 'Data Privacy'

- Section I to contain the overarching framework for access to data via lawful bases of Legitimate Interest & Public Task
- Provisions for: Application to use Data, scope of Data access, termination of access to Data.

Privacy Controls Framework

- Privacy Controls Framework to contain more granular requirements for data access:
 - Documentary evidence requirements, purpose of use, assessment of necessity, details of premises in question.

Approved Use List

- Record of previous applications to access consumer Consumption Data via lawful bases of Legitimate Interest & Public Task.
- To be published online by the Privacy Sub-Committee.

■ Refinement Consultation: Key Points (For)

Respondent comment

“[MP234...] will unlock benefits of smart meter data to several use cases with high social and economic impact, which are currently constrained by the impractical need to collect individual unambiguous consent”

SECAS response

SECAS thanks the respondent for elaborating on the expected benefits for SEC Other Users & non-SEC Parties.

“Local Authorities (PT scenario) will have the possibility to make use of the smart meter data to proactively and more efficiently detect fuel poverty [...]”

SECAS thanks the respondent for providing more information on the type of use cases that applicants for Data access via PT can expect.



■ Refinement Consultation: Key Points (Against)

Respondent comment

“We think there is a very real risk of harm to consumers from MP234 – if they consider their trust has been breached (i.e., if they were told that no-one would access their HH data without their consent, and they now find that a range of parties now can access it [...]).”

“We believe that the proposed solution will be negative for consumers in relation to their control over their data. Reliance on GDPR principles of Legitimate Interest or Public Task considerations would be counter to the principle of consumers having control over their data”

SECAS response

“Numerous safe-guards have been put in placed over and above the existing safe-guards.”

“Through the use case proposal and review process we are confident any concerns can be addressed as there is no obligation on the PSC to approve any given use case to grant approval.”



Privacy Sub-Committee

Provided feedback on the draft legal text.

No Collective View: Some members opposed to the Modification, some (incl. Proposer) in favour.

Concerns raised over a perceived reduction in privacy controls on consumer Consumption Data.

Working Group

Working Group members voiced concerns about the Modification.

Questions about erosion of consumer control of their Data.

Questions raised about why existing avenues of Data access are insufficient.

■ MP234: Cost/Benefit Assessment

Costs

Three Parties quantified costs to their organisation:

- Two respondents in favour indicated costs between £1-£49,999 due to changes to materials and training resources.
- One respondent (a Large Supplier) opposed indicated costs of £50,000 - £249,999 arising from updates to their Privacy Policy, and an anticipated uptick in consumer enquiries and complaints about usage of their data.

Benefits

Three Parties quantified benefits for their organisation

- Two respondents identified benefits ranging between £1-£49,999 due to an expected enhancement in service provision.
- One respondent indicated benefits ranging between £50,000-£249,999 due to the proposed solution unlocking new use cases and viable business scenarios.

■ MP234: Assessment of consumer impact

Consumer Benefit

- Enhanced service offering to consumers in fuel poverty.
- More effective interventions from Local Authorities via PT Data access.
- Access to Consumption Data via LI for financial institutions may allow them improve green finance models and use them to deliver savings to consumers.

Consumer Detriment

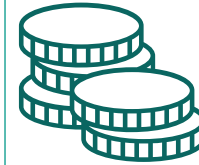
- Loss of control over Consumption Data.
- Erosion of confidence in Smart Metering as data is shared without consent.
- PT use cases potentially redundant with existing schemes such as DCC's uZero project.

■ MP234: Assessment of Change



Impacted Parties & Groups

- Other SEC Parties
- Suppliers (Large & Small)
- Consumers



Costs

- SECAS implementation costs
- No DCC Costs
- SEC Party costs arising from adapting operational processes & materials.



Target Release

- Ad hoc SEC Release 1 Working Day following Authority Decision.



Benefits

- Financial benefits expected for Parties offering new services using Data acquired via PT & LI
- Enhanced service offering to consumers.

SEC Objectives (a), (c), (d), (e), (f), (g)*

*Please refer to descriptions on the next slide

■ MP234: Assessment against SEC Objectives

SEC Objective	Description	In Favour	Opposed To
(a)	facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain	4	1
(c)	facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems	5	1
(d)	facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy	3	-
(e)	facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy	4	-
(f)	ensure the protection of Data and the security of Data and Systems in the operation of this Code	5	2
(g)	facilitate the efficient and transparent administration and implementation of this Code	4	1

■ MP234: Recommendations

- **DETERMINE** whether MP234 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP234 should be progressed as an Authority-Determined Modification

■ MP289 'BCDR Engagement'

Talia Lattimore

Raised by David Rollason from DCC

Progress to Report Phase

MEDIUM

■ MP289: Overview

- The DCC's approach to Business Continuity and Disaster Recovery (BCDR) testing has evolved with current arrangements not accounting for change.
- SEC Parties have no formal visibility over how the DCC approaches BCDR testing.

Issue



- Current engagement and notification requirements for tests not expected to impact provision of service adds complexity with little benefit and limits flexibility.
- Lack of formal visibility on DCC's approach gives parties little insight into the purpose and benefits of testing.

Impact



- Section H 'DCC Services'
- DCC only required to notify SEC Parties of BCDR testing that is expected to impact provision of DCC services.
- DCC to produce and make available a BCDR Testing Approach document.

Proposed Solution



■ Proposed Solution summary

Notification and Engagement Requirements

- ***Amend Section H10.12A and H10.12B so that engagement and notification requirements only apply where BCDR testing is expected to impact the provision of DCC services.***
- The DCC will continue to include all BCDR testing in its annual consultation as it does now. However, not applying the notification and engagement requirements for BCDR tests that are not expected to impact the provision of services will allow greater flexibility for change throughout the year if needed for these tests.

BCDR Testing Approach Document

- ***Add new Section H10.12C requiring the DCC to produce and make available a BCDR Testing Approach document.***
- This will include requirements for the DCC to publish it on the DCC website, keep the document under review and up to date as well as requirements on the information contained within it, as a minimum.
- The DCC has not sought a review or made any amendments to the current approach to BCDR testing as part of this Modification.

Forum views

Working Group

Remains neutral

Requested SECAS seek guidance from Sub-Committees and that DCC confirm any wider impacts.

TABASC

Supports the modification

Supports the initiative of the change but requested general ongoing engagement on BCDR testing.

TAG

Remains neutral

No comments or concerns raised with regards to the modification.

OPSG

Remains neutral

Remains neutral but requested to be kept up to date on the outcome of any TABASC discussions.

Refinement Consultation key points

Respondent comment

Several comments were received on the content of the draft DCC BCDR Testing Approach Document. This feedback included suggested changes to the approach and some areas in the document that would benefit from further clarity.



SECAS response

SECAS have fed comments back to the Proposer who has provided detailed responses, which SECAS included in the consultation response document. It should be noted that MP289 is not seeking to review or amend the current approach but rather to ensure that the DCC produce documentation that provides clarity and transparency to Parties.

The DCC welcomes any feedback Parties have on the process. The DCC has provided an updated version of its testing approach document (V0.6) for information following consultation.

Refinement Consultation key points

Respondent comment

Regarding legal text, it has been suggested that the following clarifications and improvements be made:

- Include objective impact criteria and defined notification processes.
- Introduce a version-controlled Change Log in the BCDR Testing Approach document for transparency.



SECAS response

The Proposer has advised that the DCC has been deploying BCDR Testing and categorised those tests as Service impacting or non-service impacting. The Proposer is not aware of a time where those categorisations have proven to be inaccurate or where Parties have been unexpectedly impacted.

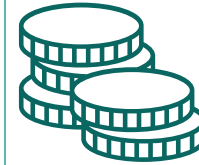
The Proposer has updated the testing approach document (V0.6) following consultation to better define “service impacting.”

■ MP289: Assessment of Change



Impacted Parties

- Suppliers
- Network Operators
- Other SEC Parties



Costs

- SECAS implementation costs



Target Release

- June 2026 SEC Release



Benefits

- SEC parties will have a greater understanding of BCDR testing.
- DCC have more flexibility regarding notification and engagement for non-impacting tests

SEC Objectives (b) & (g)

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

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

■ MP289: Recommendations

- **DETERMINE** whether MP289 should be progressed to the Report Phase
- **APPROVE** the Modification Report
- **APPROVE** the implementation approach
- **AGREE** that MP289 should be progressed as a Self-Governance Modification



MP312 'Caching SRV 4.10 for SMETS1 Devices'

Ali Beard
(late paper)

BREAK



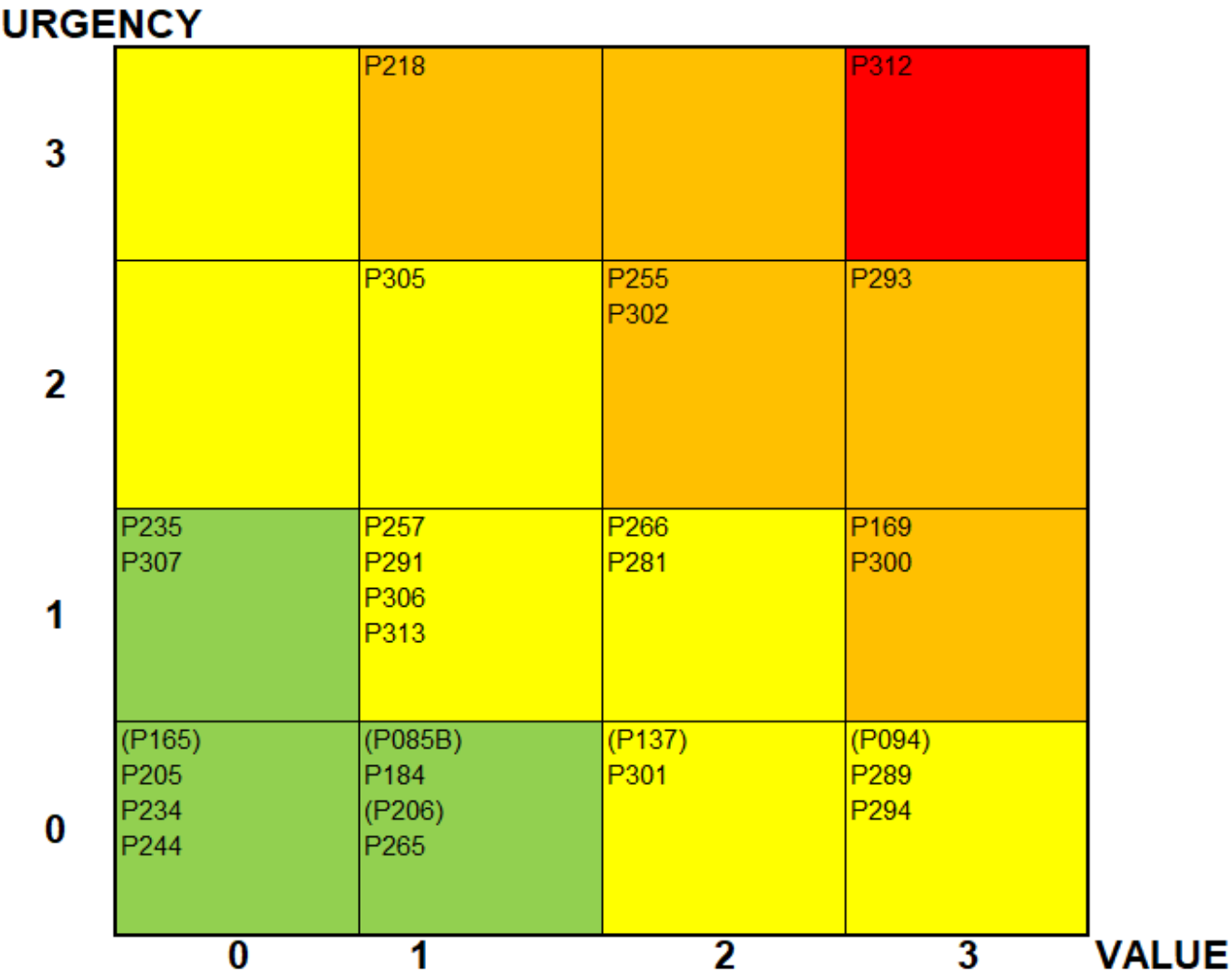
PLEASE RETURN IN 10 MINUTES



Agenda item 4

SEC Modification Timetables
Khaleda Hussain

Summary and Matrix



- 29 Active Modifications
- Five Modifications on hold
- No new mods raised

■ (High and very high priority)*

- MP169 'Managing the consumers refusal of a Smart Meter Installation'
- MP218 'Review of the SEC Charging Methodology'
- MP255 'WAN issues during Smart Meter installations'
- MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'
- MP300 'Additional Operational Metrics to Measure on Success'
- MP302 'Supplier Alert for ENOs'

* We will be amending the priority to align with the SDS

Hold List – no change since last month

- MP085B - SECAS monitoring the implementation of firmware updates by two Manufacturers who do not currently implement MP085A functionality.
- MP094 - Due to Proposer wanting to evaluate post launch performance for the virtual WAN solution and review mid 2026.
- MP137 - Dependent on implementation in FSM.
- MP165 - The Proposer is awaiting the agreement and creation of a Publicly Available Specification (PAS) document to determine any consequential changes to the SEC that may be needed as a result. This could take up to 5 years
- DP206 - Dependant on REC change R0207 unlikely to be delivered until mid 2026.

■ On hold - Request

DP266 'Alternative SMETS1 UTRN Generation'

- The issue relating to DP266 may potentially overlap with the Proposed Solution of MP293 'Deferment of DCC Planned Maintenance during Adverse Weather', therefore the Proposer approved placing the modification on hold until further notice.
- We would like to ask CSC members if DP266 can go on the on-hold list unless there are any objections

AMENDMENTS TO TIMELINES

Mod No	Modification Name	Original Report Date	New Report Date	Reason
MP169	Managing the Consumer's refusal of a Smart Meter	January 2026	June 2026	Engaging with the Ombudsman and consumer consent programme
MP235	Enhanced Meter Data Access for Other Users	May 2025	June 2026	Legal text development was contingent on the completion of the legal drafting
MP281	Install Codes in the SMI	February 2026	June 2026	Additional PIAs were required for existing DSP and FSM
MP293	Deferment of DCC Planned Maintenance during Adverse Weather	-	September 2026	Introduction of a new technical solution option has resulted in more time being required to Refine the Modification

AMENDMENTS TO TIMELINES

Mod No	Modification Name	Original Report Date	New Report Date	Reason
MP300	Additional Operational Metrics to Measure on Success	-	September 2026	Additional time was required to determine the scope of the solution following feedback on the Business Requirements
MP301	Review of Additional Registration Data (Gas Transporters)	-	March 2026	More time than anticipated has been required to resolve outstanding questions relating to the proposed solution
MP306	Alternative Self Service Data solution for Service Users	August 2026	September 2026	Due to ongoing development of the business requirements prior to a requirement workshop

■ Recommendations

- **NOTE** the update
- **AGREE** the amended decision dates



Agenda item 5

SEC Releases Update
Georgie Severin

■ 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.

■ 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	Legal text implemented in 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. This modification was implemented in the November 2025 SEC Release.
MP137	Sharing information on Defects and Issues	Dependent on whether the business requirements are delivered in FSM.

February 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
MP310	Trial Device Assurance Certificate	
MP303	Aligning DCC Certificate processes with SMKI standards	
MP314	Housekeeping changes for February 2026 SEC Release	

MP303 was approved on 28 January 2026. MP314 was approved as Fast-Track on 20 January 2026

June 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
-	-	-

Targeted Modifications		
Mod No.	Mod Name	Status
MP289	BCDR Engagement	
MP313	Remove the DCC requirement to delete CHs from the SMI	

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
MP304	Scheduling Services for SMETS1 Devices (SRV 4.3)	

Targeted Modifications		
Mod No.	Mod Name	Status
MP281	Install Codes in the SMI	

MP281 was added to the scope of the November 2026 SEC Release since the January 2026 CSC meeting.

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

■ Ad hoc 2025 SEC Release

Modifications		
Mod No.	Mod Name	Status
MP234	Addition of Public Task and Legitimate Interests into the SEC	
MP241	Interoperability Checker Update	
MP309	Housekeeping changes for SEC Section G – Security	
MP312	Caching SRV 4.10 for SMETS1 Devices	

MP309 was implemented on 29 January 2026 alongside the DESNZ VWAN Designation.
MP234 was added to the scope of the ad hoc SEC Releases since the January 2026 meeting.

■ Recommendations

The CSC is requested to:

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



Agenda item 6

CSC Go / No-Go Decision February 2026 SEC Release
Georgie Severin

February 2026 SEC Release

Approved Modifications		
Mod No.	Mod Name	Status
MP310	Trial Device Assurance Certificate	
MP303	Aligning DCC Certificate processes with SMKI standards	
MP314	Housekeeping changes for February 2026 SEC Release	

All modifications are legal text change only.

■ Recommendations

The CSC is requested to:

- **DETERMINE** whether the February 2026 SEC Release should go ahead.



Agenda item 7

Any Other Business

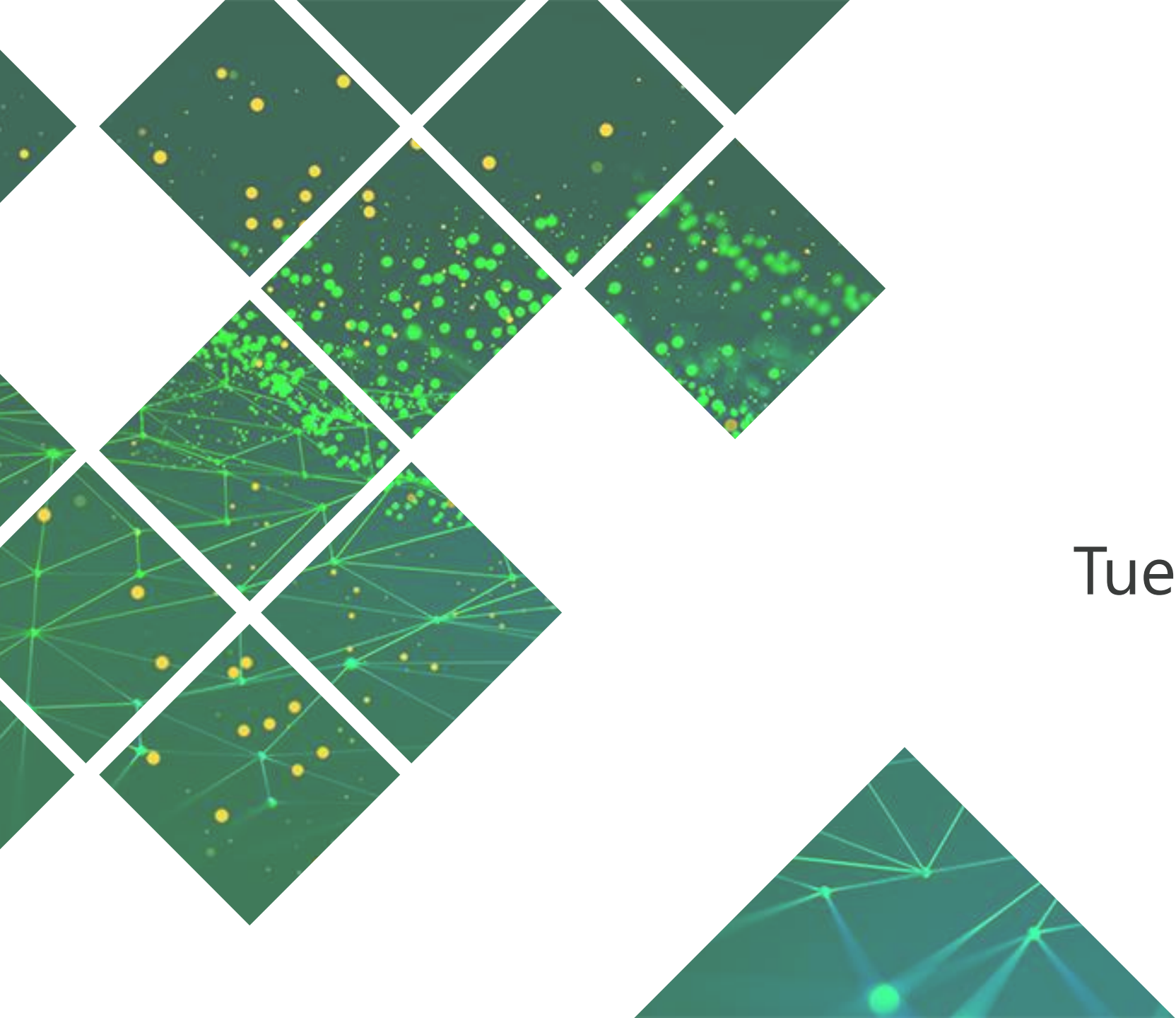
YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@talan.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 March 2026