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SEC Change Sub-Committee Meeting 84_1702

17 February 2026, 10:00 – 12:00

Teleconference

SECCSC_84_1702 – Draft Minutes

Attendees:

Representing	CSC Members	Organisation
Change Sub-Committee Chair	Ali Beard (AB)	Change Sub-Committee Chair
Large Suppliers m	Rochelle Harrison (RHa) (<i>Alternate for Emma Johnson</i>)	British Gas
	Emslie Law (EL)	OVO
Small Suppliers	Carolyn Burns (CB) (<i>Alternate for Daniel Davies</i>)	ESG Global
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution (NGED)
Consumers	Caroline Farquhar (CF)	Citizens Advice
Other SEC Parties	Philip Doyle (PD)	Reverve Ltd

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
Graeme Milligan (GM)		
Ofgem		
Shaun McRaith (SMc)	Ellie Osobina (EO)	
Charles Clark (CC)		
Observers		
Kirsty Maddock (NGED)	Matt Roderick (SMS Energy) (Item 3)	
The SEC Change Team		
Abi Obadan (AO) <i>Meeting Secretary</i>	Khaleda Hussain (KH)	Lydia Bentley (LB)
Georgie Severin (GS)	Simon Grimwood (SG)	Talia Lattimore (TL)

Apologies:

Representing	CSC Members	Organisation
Other SEC Parties	Gerd Busker (GB)	Prescience
Other SEC Parties	Charlie Sands (CS)	My Fuse Energy

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the Change Sub-Committee (CSC) meeting.

The SEC Change team 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
76/04	SECCo (RH) to confirm Paper Classification approach with SEC Governance Team
Meeting update 17/02/2026: The Chair confirmed the action would remain open and advised she would follow up with Robin Healey to progress closure.	
Status: Open.	

3. SEC Modification Progression

MP289 'BCDR Engagement'

The SEC Change Team (TL) presented a summary of MP289 'BCDR Engagement' raised by the Data Communications Company (DCC) and explained that the DCC's approach to Business Continuity Disaster Recovery (BCDR) testing has evolved, but that they feel the existing Smart Energy Code (SEC) provisions do not fully reflect current practice. The modification proposes to limit formal notification requirements for BCDR tests to those expected to impact DCC services. However, the DCC will while retain annual consultation coverage for all BCDR tests, regardless of impact. The modification also proposes that the DCC should be required to produce and publish a BCDR Testing Approach Document to provide formal visibility and transparency to SEC Parties of the DCC's approach to BCDR testing.

A CSC member (RHa) queried the legal drafting language used by highlighting the framework being reviewed "from time to time". They noted their preference for clearer periodicity and noted that reviewing the framework annually or biannually would be preferable. The SEC Change Team (TL) responded noting that they would raise this with the Proposer (the DCC), although the Proposer had not chosen to amend the legal text when they last considered comments. The CSC Chair (AB) confirmed that the SEC Change Team (TL) would investigate this matter further.

Following this the CSC:

- **AGREED** that MP289 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach and;
- **AGREED** that MP289 should be progressed as a Self-Governance Modification.

The SEC Change Team (TL) discussed RH's comments with the Proposer after the meeting and whilst they did not wish to amend the legal text, they did agree to amend the BCDR Testing Approach Document. The Proposer provided an updated version of the document, which was published alongside the Report Consultation documents. This updated version confirms that the BCDR Testing Approach Document will be reviewed annually.

MP312 'Caching SRV 4.10 for SMETS1 Devices'

The CSC Chair (AB) presented an update on [MP312 'Caching SRV 4.10 for SMETS1 Devices'](#) raised by the DCC and explained that for SMETS1, Service Request Variant (SRV) 4.10 'Read Network Data' requires two SMS messages for each request and that changes in usage volumes (particularly by Network Parties) have resulted in increased costs for the DCC and its Users. The CSC Chair (AB) noted that the Proposed Solution is to enable caching of SRV 4.10 outputs under the SMETS1 Middle Operating Capability (MOC) arrangements to avoid unnecessary SMS generation and associated costs.

A CSC member (EL) queried how the firmware update would be governed or managed, referencing existing challenges with SMETS1 and highlighted that the change is not mandating firmware updates. The CSC Chair (AB) responded and noted that the approach would not be mandated and the DCC (BB) confirmed that obligating Suppliers was in fact initially considered, however this idea was ultimately rejected. The same CSC member (EL) also raised concern regarding potential Manufacturer charges as occurred with a necessary firmware upgrade for the Final Operating Capability (FOC). He highlighted that it is the Suppliers who have to pay for the firmware changes. The DCC (DW) responded, noting that they had previously investigated the possibility of Service Providers (SPs) carrying out the firmware updates, but had found that this solution was not manageable and that it contravened existing mandates. Further, the DCC (GM) added that it would have been a complex solution to put in place. He stated that the DCC did not believe that there would be any charges if implemented. The CSC Chair (AB) also added that they understood that the costs were being covered following a SEC Panel decision and the CSC member (EL) clarified that they were raising this concern as the potential costs associated could be significant for Suppliers.

Another CSC member (RH) then queried why the legal text did not simply reference SRV 4.10 directly and expressed concern that the usage of the wording 'Data Log' within the proposed legal text¹ may be too ambiguous. The DCC (BB) acknowledged this query had not been fully considered and confirmed that they were happy to discuss further offline. The DCC (BB) also agreed with the CSC member (RH) noting that the SRV 4.10 wording they had suggested could be more suitable. The CSC Chair (AB) then queried whether any other SRVs would cause issues and the DCC (GM) confirmed that they did not expect any other SRVs to do so.

Finally, an Observer (KM) queried the percentages underpinning the cost avoidance for this modification and highlighted that there had been a shift from the 80% uptake figure (which was initially presented at

¹ Appendix AM (f) Where the target SMETS1 ESME has an active DSP Schedule (with its DUIS meaning), the S1SP shall cache the **Data Log** (with its SMETS1 meaning) that contains entries from the previous 32 days and up to 00:00 of the current day to populate the contents of a SMETS1 Response to any subsequent Service Request from any Party until such time as the DSP Schedule (with its DUIS meaning) is removed. Any data that is cached as a result of this clause will be stored for a maximum period of 32 days.

the Working Group) to 93%. The CSC Chair clarified that the 80% uptake related to SRV 4.3s which were part of a different modification (MP304) and that the 93% uptake applied to SRV 8.10s.

The CSC:

- **AGREED** that MP312 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach and;
- **AGREED** that MP312 should be progressed as a Self-Governance Modification.

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

The SEC Change Team (LB) presented information on [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#) and outlined that the current SEC position permits access to Consumption Data based on Unambiguous Consent. The proposed change would add access routes based on General Data Protection Regulation (GDPR) lawful bases of Legitimate Interests and Public Task, with corresponding changes to SEC Section I and the Privacy Controls Framework (PCF). The SEC Change Team (LB) further noted that Section I would contain the overarching framework, while the PCF would contain detailed evidentiary requirements. An Approved Use List would be published by the Privacy Sub-Committee (PSC) to provide transparency regarding its application and outcomes.

The CSC:

- **AGREED** that M234 should be progressed to the Report Phase;
- **APPROVED** the Modification Report;
- **APPROVED** the implementation approach and;
- **AGREED** that MP234 should be progressed as an Authority-Determined Modification.

4. SEC Modification Timetables

The SEC Change Team (KH) provided an update on the timetables for Modification Proposals, providing an updated Prioritisation Matrix and summaries of high and very high priority modifications. The SEC Change Team (KH) reported that there were 29 active modifications, 5 on hold and no new modifications raised. They further advised that priorities would be amended to align with Ofgem's new Strategic Direction Statements (SDS) prioritisation approach as presented under agenda item 8 of the [Change Sub-Committee Meeting 83](#).

The SEC Change Team (KH) then requested that [DP266 'Alternative SMETS1 UTRN Generation'](#) be placed on hold due to the issue relating to DP266 may potentially overlap with the proposed solution of [MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'](#). They further advised the Proposer approved placing the modification on hold until further notice. The CSC Chair (AB) noted that there were no objections by CSC Members.

The CSC:

- **AGREED** to place MP266 on hold and;
- **NOTED** the updates on the SEC Modification Timetables.

5. SEC Releases Update

The SEC Change Team (GS) presented an update on the SEC Releases confirming that the February 2026 SEC Release will include the following SEC Modifications;

- [MP303 'Aligning DCC Certificate processes with SMKI standards'](#)
- [MP310 'Trial Device Assurance Certificate'](#)
- [MP314 'Housekeeping Changes for February 2026 SEC Release'](#)

The June 2026 SEC Release will target the release of the following SEC Modifications:

- [MP289 'BCDR Engagement'](#) and;
- [MP313 'Remove the DCC requirement to delete CHs from the SMI'](#).

The approved Modifications for the November 2026 SEC Release will include:

- [MP304 'Scheduling Services for SMETS1 Devices \(SRV 4.3\)'](#).

The targeted Modification for the November 2026 SEC Release is:

- [MP281 'Install Codes in the SMI'](#).

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

6. CSC Go/No Go: February 2026 SEC Release

The SEC Change Team (GS) presented the approved modifications for the February 2026 SEC Release and the CSC **AGREED** that it should go ahead as presented.

The CSC **NOTED** the update.

7. Any Other Business (AOB)

A CSC Member (CB) queried whether the Consumer Consent solution (CC) initiative, (an Ofgem-initiated, Retail Energy Code Company (RECCo) led scheme to standardise how access to consumer Consumption Data is managed), would have an opportunity to review the report for [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#) and respond to it before the next Change Board meeting scheduled for Wednesday 25 March 2026. The CSC Chair (AB) clarified that Ofgem (CC) had

attended the current CSC meeting for this modification as they were involved with the Consumer Consent initiative. The CSC Chair (AB) agreed that it would be useful for the Change Board to consider a response and agreed to specifically request a response from RECCo.

Finally, the CSC Chair (AB) introduced the upcoming Digital Service Desk implementation for the SEC helpdesk mailbox (SEC@talan.com) on 5 March 2026 and explained that emailing the helpdesk will generate an automatic ticket confirmation that will enable improved tracking against Service Level Agreements (SLAs) and response performance. She further noted that the SEC.Change@talan.com mailbox is currently not included in this programme but may be in future.

There was no further business and the Chair closed the meeting.

Next Meeting: 25 March 2026

DRAFT