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SEC Change Sub-Committee Meeting 86_2104

21 April 2026, 10:00 – 11:05

Teleconference

SECCSC_86_2104 – Draft 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)	Prescience
Other SEC Parties	Charlie Sands	My Fuse Energy
Other SEC Parties	Philip Doyle (PD)	Reverve Ltd
Network Parties	Kelly Kinsman (KK)	National Grid Electricity Distribution
Consumers	Caroline Farquhar (CF)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
Taj Nezami (TN)		
Ofgem		
Shaun McRaith (SMc)		
The SEC Change Team		
Abi Obadan (AO) <i>Meeting Secretary</i>	Khaleda Hussain (KH)	Lydia Bentley (LB)
Georgie Severin (GS)	Simon Grimwood (SG)	

1. Welcome and Introductions & Approval of Previous Meeting Minutes

The Chair welcomed members to the 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 SECAS Governance Team
A CSC Member (EJ) noted that she had observed an improvement in paper declassification since the issue had been raised, noting that misclassifications were now being identified and corrected promptly when challenged. She then requested that this action remain open at this stage, noting that ongoing visibility of the issue was helping to maintain discipline. The CSC agreed that this action should remain open. Status: Open.	

3. SEC Modification Progression

DP319 'SRV 11.3 – Activate Firmware Request Firmware Hash Validation'

The SEC Change Team (GS) introduced [DP319 'SRV 11.3 – Activate Firmware Request Firmware Hash Validation'](#) and outlined that Service Request Variant (SRV) 11.3 currently allows Data Communication Company (DCC) Users to request the activation of a firmware image and that while the DCC validates general request fields and execution timing, it does not currently validate the Firmware Hash contained within the request against the corresponding value held in the Central Product List (CPL) prior to initiating the CS06 command to the target Device. GS explained that this presents a risk as a bogus or unapproved firmware image could be activated, potentially resulting in adverse security impacts as well as downstream impacts on the DCC Total System and CSP performance.

The DCC (TN) expanded noting that the firmware download process and the subsequent activation request are not intrinsically linked and that as a result, where a Firmware image has been downloaded outside of the standard DCC-controlled processes, SRV 11.3 could still be used to request activation of that image without additional validation. He explained that the proposed solution would require the DCC to validate the Firmware Hash provided in the SRV 11.3 request against the corresponding value held in the Commissioned Product List (CPL) and where a mismatch is identified, to return an error (E57) and not initiate the CS06 command. He added that the modification would also require limited consequential drafting changes to SEC Appendix AD 'DCC User Interface Specification (DUIS)', together with minor updates to the Business Architecture Document for Smart Metering GB and the Meter Firmware Management Best Practice Guidance Notes.

A CSC Member (DD) queried the practical circumstances under which such a scenario could arise, noting that SRV 11.1 Firmware download requests are already validated against the CPL. In response, the DCC (TN) confirmed that the risk arises specifically in scenarios where Firmware images have been downloaded offline, for example as part of Commercial Product Assurance (CPA) trial or demonstration activity and are subsequently activated via SRV 11.3 without hash validation. He advised that, while the

likelihood of this occurring is low, the potential impact associated with activating an unapproved firmware image would be high.

The DCCDW) queried the urgency of the modification, observing that urgency would depend on whether delivery was required into the current Data Service Provider (DSP) arrangements or only into the future DSP model, and noting that earlier delivery could be achieved but would be more complex and costly. The CSC Chair (AB) commented that, if the modification could not realistically be delivered into the November 2026 SEC release, the CSC would require a clearer understanding of both the likelihood of the risk materialising and the severity of the potential impact in order to assess urgency.

A CSC Member (DD) further noted that the issue being addressed was not newly introduced and had existed for several years, questioning whether the risk profile had materially changed. In response, the CSC Chair (AB) highlighted the sensitivity of the security-related information being discussed and proposed that the paper classification be amended from Clear to Green to limit wider circulation and the CSC agreed

The SEC Change Team (GS) confirmed that the Issues Group had previously raised questions regarding the potential costs associated with the modification and had suggested further engagement with the Security Sub-Committee. GS advised that the Security Sub-Committee supported the modification in principle and considered that it would strengthen existing security controls. The DCC (TN) added that, from a technical perspective, the proposed change was expected to be relatively limited, as existing validation and error-handling mechanisms could largely be reused, although a formal impact analysis would be required to confirm cost and delivery implications.

Following this clarification the CSC:

- **AGREED** that the issue and the impact DP319 is having were clearly defined and understood;
- **AGREED** that DP319 should be converted to a Modification Proposal;
- **AGREED** that MP319 should be progressed to the Refinement Process and;
- **AGREED** the first package of work and the timetable for MP319.

DP320 'Enhanced MAP & Manufacturer DCC Reporting'

The SEC Change Team (SG) introduced DP320. SG outlined that MP181 'Meter Asset Provider and Device Manufacturer access to asset related data held by the DCC' had introduced a reporting dataset for Meter Asset Providers (MAP) and Manufacturers, and that this proposal sought to enhance the existing dataset and introduce a new SEC Required Document to provide a more flexible governance mechanism for future changes. SG described the proposed enhancements, which included the proposed addition of six new Data points. SG noted that these Data points are already captured for other purposes across DCC reporting datasets and therefore would not require new system development.

The DCC (BB) confirmed they had engaged with MAPs and Manufacturers, where they had expressed their support for enhanced reporting. BB clarified that, while some provisions introduced under MP181 would be removed from existing documentation, key safeguards would remain, including explicit charging arrangements and restrictions preventing MAPs and Manufacturers from onward sale of the Data. BB confirmed that these protections would also be reflected in the proposed SEC Required Document.

The SEC Change Team (SG) noted that the enhancement would support improved operational performance and could deliver Consumer benefit by reducing avoidable meter removals. SG also

advised that draft legal text would be developed during the refinement phase and brought back to the CSC for review later in the modification process.

The CSC:

- **AGREED** that the issue and the impact DP320 is having were clearly defined and understood;
- **AGREED** that DP320 should be converted to a Modification Proposal;
- **AGREED** that MP320 should be progressed to the Refinement Process and;
- **AGREED** the first package of work and the timetable for MP320.

4. SEC Modification Timetables

The SEC Change Team (KH) provided an update on SEC Modification Timetables, confirming that there were 33 active modifications and four currently on hold.

A CSC Member (EJ) queried whether DP266 was expected to overlap with MP293. The SEC Change Team (SG) explained that MP293 may resolve the issue originally raised under DP266 but that no decision could be taken until MP293 was approved. He added that DP266 had not progressed previously due to resourcing constraints and was subsequently overtaken by MP293.

The CSC Chair (AB) explained that a letter had been received from DESNZ and Ofgem regarding the proposed Data Repository and that a number of modifications should be placed on hold pending clarification of scope. She outlined the rationale for placing MP218, MP234, MP235 and DP257 on hold, noting that these proposals relate to access to data and charging arrangements which may be superseded by the Data Repository or Smart Metering Energy Data Repository (SMEDR) solution.

A CSC Member (DD) highlighted that placing modifications on hold assumed that Parties would adopt the Data Repository solution and noted that this may not ultimately be the case. The CSC Chair (AB) responded noting that the intention was to pause work to avoid duplication until the position was clearer. A CSC Member (EJ) confirmed that she had no objection to MP218 being placed on hold but requested that Ofgem and DESNZ be explicitly made aware of the decision and its implications for charging. Shaun McRaith confirmed that he had noted this request and would follow up.

The CSC Chair (AB) then raised DP307 for discussion, explaining that it related to access to consumption data on behalf of consumers and may also be impacted by the Data Repository scoping exercise. CSC Members (EJ) and (DD) both expressed reservations about the modification progressing while policy direction remained uncertain and a CSC Member (EJ) suggested that, given the forthcoming scoping study, it would be prudent to place DP307 on hold, with the option to bring it back quickly if required.

The CSC confirmed that Alert-related modifications MP291 and MP302 should continue, as Alerts were considered operational in nature and unlikely to be addressed through a data repository solution.

A CSC Member (CF) queried the status of MP169 and MP255, noting that both had been progressing slowly despite being high priority. The CSC Chair (AB) advised that discussions were ongoing with the Energy Ombudsman in relation to MP169 and that MP255 was being considered in the Operations Group (OPSG). The SEC Change Team (SG) confirmed that further discussion were expected and that updates would be provided at a future CSC meeting.

The CSC:

- The CSC **AGREED** that MP307 should be placed on hold and **NOTED** the updates on the SEC Modification Timetables.

5. Post Decision Delivery and Ofgem expected decision dates

The SEC Change Team (KH) presented an update on the Post Decision Delivery and highlighted there was one new item MP312 'Caching SRV 4.10 for SMETS1 Devices'. The CSC Chair (AB) explained that the modification was approved and had moved into Firmware development and would subsequently enter the Firmware rollout stage. The DCC (BB) advised that progress was on track with delivery and there are no new updates and this is still targeting for go-live date of February 2027.

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

6. SEC Releases Update

The SEC Change Team (GS) provided an update on upcoming SEC Releases. She confirmed that delays to Future Services Management (FSM) had impacted several modifications, although FSM was now expected to go live on 25 April 2026.

She confirmed that MP289 'BCDR Engagement' was the only modification currently targeted for the June 2026 SEC Release and was due to be voted on by the Change Board. Further, she noted that there were currently no modifications targeting the February 2027 SEC Release.

The DCC (BB) advised that the November 2026 Testing Approach Document (TAD) consultation had closed with no responses. He queried whether CSC Members had any concerns that needed to be captured ahead of Testing Advisory Group (TAG) approval and no concerns were raised by the CSC.

The SEC Modifications awaiting FSM are;

- [MP137 'Sharing information on Defects and Issues'](#)
- [MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'](#)
- [MP252 'Amending the process for Communications Hub returns'](#)

The June 2026 Release will include;

- [MP289 'BCDR Engagement'](#)

The November 2026 Release will include;

- [MP304 'Scheduling Services for SMETS1 Devices \(SRV 4.3\)'](#)
- [MP281 'Install Codes in the SMI'](#)
- [MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'](#)
- [MP301 'Review of Additional Registration Data \(Gas Transporters\)'](#)

- [MP316 'DUIS SRV12.2 Pre-Notification of CHF Ambiguity'](#)
- [MP318 'Incorporation of Category 3 Issue Resolution Proposal into the SEC – Batch 12 and GBCS Changes'](#)

The Ad Hoc 2026 Release will include;

- [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#)
- [MP241 'Interoperability Checker Update'](#)
- [MP312 'Caching SRV 4.10 for SMETS1 Devices'](#)
- [DP315 'Dual running of DCC Smart Meter Communication Licence'](#)
- [MP317 'SMETS1 FOC ANSO implementation housekeeping changes'](#)

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

7. Any Other Business (AOB)

A CSC Member (EJ) raised concerns regarding a recent DCC consultation in relation to [MP308 'Out of Region Communications Hubs'](#) and [MP311 'Additional Out of Region Communications Hubs Amendments'](#). She explained that, if sufficient industry support was received late in the process, this could result in an urgent modification being required close to expiry dates, which she considered undesirable. She emphasised that urgent modifications can increase delivery risk and reduce quality.

The CSC Chair (AB) agreed that this was a valid concern and suggested that the CSC take an action to discuss the issue further with the DCC, including whether a non-urgent modification could be raised in advance to avoid raising this modification at a later stage. A CSC Member (EJ) agreed that this would provide greater certainty, even if it later transpired that no extension is required.

86/01: The SEC Change Team to discuss whether an urgent modification should be raised following further discussions of MP308 and MP311.

There was no further business from members.

Next Meeting: 19 May 2026