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DP299

‘Update Citizens Advice Scotland to Consumer Scotland’

Modification Report

Version 0.1

24 July 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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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) to deliver the Proposed Solution.

Contact

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1. Summary

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

Citizens Advice Scotland's energy consumer advocacy functions have transferred to Consumer Scotland, but both bodies remain in existence.

The Proposed Solution is to update references in the SEC to 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 an ad hoc implementation. This is a Fast-Track modification.

2. Issue

What are the current arrangements?

The Consumer Scotland Act 2020 (Consequential Provisions and Modifications) Order 2022 replaced references in the Electricity Act 1989 and the Gas Act 1986 and various other energy-related legislation to 'Citizens Advice Scotland' with 'Consumer Scotland'. This confirms that energy-related functions are now being exercised by Consumer Scotland instead of Citizens Advice Scotland.

What is the issue?

These out-of-date references within the SEC make SEC documents harder to interpret and potentially lead to confusion or misunderstanding.

What is the impact this is having?

If these errors are not resolved, the SEC Documents will contain inconsistencies. Leaving these in could cause confusion for Parties when reading these documents and increases the chances of further inconsistencies occurring in the future.

Impact on consumers

The identified issue does not impact consumers.

3. Solution

Proposed Solution

The Proposed Solution is to update the references to Citizens Advice Scotland to Consumer Scotland.

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 errors and inconsistencies within the SEC will be addressed and corrected.

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'

The full legal text changes can be found in Annex A.

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 Release** fifteen Working Days following decision

This is a fast-Track Modification and if approved will be implemented fifteen Working Days following the decision by the Change Sub-Committee.

7. Case for change

Business case

This modification will address out of date references 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 out of date references. There are no DCC costs and only a minimal SECAS cost to implement.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	24 Jul 2025
<i>Presented to CSC for decision</i>	<i>19 Aug 2025</i>

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

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