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# DP301

## ‘Review of Additional Registration Data (Gas Transporters)’

### Modification Report

Version 0.1

9 September 2025

Corporate member of  
Plain English Campaign  
Committed to clearer  
communication

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## About this document

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This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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## 1. Summary

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This proposal has been raised by Tracey Saunders from Northern Gas Networks Ltd.

Gas Network Parties accede to the Smart Energy Code (SEC) as part of their obligations under their licence from Ofgem. It's been identified that Gas Network Parties have few very explicit obligations under the SEC; only two, relating to the provision of Additional Registration Data to the Data Communications Company (DCC). The Proposer has suggested that these obligations could be transferred from the SEC into the Retail Energy Code (REC), as the Additional Registration Data relates to Data found within the REC. In this way, Gas Network Parties may be able to withdraw from the SEC entirely, reducing their overall regulatory burden.

This will be explored as a cross-code Modification, where it will first be determined if the obligation may leave the SEC, and then secondly, whether it may be absorbed by the REC. As part of the development of this Modification, the Smart Energy Code Administrator and Secretariat (SECAS) will also explore with the Proposer, and with affected stakeholders, the broader implications of the transfer of obligations, namely, secession from the SEC by Gas Network Parties.

## 2. Issue

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### What are the current arrangements?

SEC Section E 'Registration Data' outlines the arrangements governing how Registration Data is provided to the DCC. The DCC uses Registration Data in order to assess a User's eligibility to receive certain Services, and for the calculation of Charges. Registration Data is provided by Electricity and Gas Network Parties for their respective fuels. Registration Data provided to the DCC falls within two broad categories as per Section E, and Additional Registration Data. The 'base' Registration data is acquired by the DCC themselves from the REC Central Switching Service (CSS) Provider, i.e., by merit of their dual role within the SEC and also within the REC as the CSS Provider. Additional Registration Data is provided on a monthly basis by Network Parties to the DCC.

Gas Network Parties accede to the SEC as part of their licencing agreement with Ofgem as Gas Transporters. As acceded Parties, they are required to fulfil their obligations within the Code. The Proposer, a Gas Network Party, has identified that they are subject only to a single Clause within the Smart Energy Code; the Clauses relating to the provision of Additional Registration Data. They have asked SECAS to explore the possibility of a transfer of this obligation from the SEC into the REC. As the Additional Registration Data relates to data that may, in the Proposer's view, sit within the REC, they feel that the obligation may be transferred.

### What is the issue?

SEC Section E 'Registration Data' contains the clauses pertaining to Gas Network Parties provision of Additional Registration Data; these are found in Clauses E5.3 & E5.4:

*E5.3 Each Gas Network Party shall with effect from calendar month October 2020 provide (or procure that its Registration Data Provider provides) to the DCC by no later than the last day*

*of each calendar month (the 'relevant calendar month') the data referred to in Section E5.4 in respect of each Gas Supplier Party.*

*E5.4 The data to be provided to the DCC by the Gas Network Party in accordance with Section E5.3 is the number of Supply Meter Points on its network that relate to Designated Premises at which:*

- (a) the Gas Supplier Party is Registered on the 15th day of the relevant calendar month; and*
- (b) the quantity of gas supplied to the premises is measured by a Gas Meter that is an Advanced Meter,*

Taken together, these Clauses indicate what type of data Gas Network Parties are required to submit to the DCC, and the frequency by which they must do so.

### **Broader Obligations on Gas Network Parties:**

Should Gas Network Parties transfer their obligations to submit Additional Registration Data from the SEC to the REC, they would have no more explicit obligations in the SEC and would therefore be free to secede from the Code. However, a number of broader regulatory requirements exist for Gas Network Parties within the SEC that would need to be considered prior to secession.

By merit of having acceded to the SEC, Gas Network Parties are also eligible to become DCC Users, as prescribed by SEC Section H – 'DCC Services':

*H1.1 Many of the Services described in this Section H are described as being available only to Users. A Party is not entitled to receive those Services until that Party has become a User by completing the User Entry Process.*

*H1.2 Only persons that are Parties are eligible to complete the User Entry Process and to become Users.*

As a result, should a Gas Network Party secede from the SEC, they would forfeit the right to become a DCC User, and would not be able to benefit from DCC Services.

Gas Network Parties are currently required to accede to the SEC as part of their licencing agreement with Ofgem. From Condition 10: The Smart Energy Code of the [Gas Transporter Licence](#):

- 1. The licensee must:*
  - (a) by no later than the Commencement Date, be a party to the Smart Energy Code; and*
  - (b) thereafter remain a party to and comply with the Smart Energy Code.*

SEC Appendix AD - 'DCC User Interface Specification' (DUIS) defines the technical and operational interface requirements between the Data Communications Company (DCC) and its Users, ensuring consistent, secure, and interoperable communication for SMS services. It references Service Requests (SRs) in Section 3.1 'Service Request Matrix' where a Gas Network Party is eligible to submit an SR:

- Read Tariff (Primary Element);
- Read Prepayment Daily Read Log;
- Read Event Or Security Log;
- Update Security Credentials (CoS);
- Read Boost Button Details;
- Read Inventory;

- Join Service (Non-Critical); and
- Return Local Command Response.

Gas Network Parties would therefore need to consider what role, if any, they have within communication of SRs to Smart Metering Systems (SMS) ahead of a decision to remove themselves from the Code.

### What is the impact this is having?

The Proposer has identified Clauses E5.3 and E5.4 as being the only explicit obligations on Gas Network Parties within the SEC. They have told SECAS that the regulatory and operational requirements on their organisation that result from Code membership are not proportional to their level of obligation under the Code. As a result, they feel that being able to transfer these obligations from the SEC into the REC would reduce the impact on their organisation that stem from Code membership.

#### Impact on consumers

There is no direct consumer impact. The provision of, and usage by, Additional Registration Data from Gas Network Parties and the DCC respectively is a “back-end” process which does not affect consumer facing processes. As the DCC primarily use Additional Registration Data for calculation of Charges to its Users, there is no direct consumer impact as a result to a change of governance surrounding its provision.

## 3. Assessment of the proposal

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### Areas for assessment

#### Determination of scale of Gas Network Party obligations

SECAS will work with the Proposer, and other Gas Network Parties, to determine the scale of obligation on this class of SEC Party. The Proposer has identified that they are subject to only two obligations within the SEC. However, as highlighted in Section 2 of this document, there are other obligations, albeit less explicit ones, within the Code, and beyond. These include:

- Considerations regarding Gas Network Parties role as a DCC User;
- Ability of Gas Network Parties to communicate with SMSs via SRs as defined within the DUIS; and
- Broader obligations on Gas Network Parties as found within Ofgem/Gas Transporter Licence

SECAS will look to assess these obligations alongside the primary obligation relating to provision of Additional Registration Data

#### Will the Additional Registration Data obligations be subject to the same scrutiny within the REC as they would be within the SEC?

This Modification will be conducted on a cross-code basis with [REC Issue I0262](#). If it is determined that the obligations on Gas Network Parties may leave the SEC, a determination will still need to be made on whether they can be accepted by the REC. SECAS will need to understand if the data can

be accessed via the REC with the same overarching protections as it has within the SEC. For example, SECAS will need to consider if the REC has (or may have) the same level of data protection and data management that exists within the SEC to ensure that there is not a degradation in the handling of the Data between both Codes.

Additionally, as cross-code Modifications, SECAS will need to work with the REC Code Manager to understand how a decision on both the SEC Modification and the REC Issue may be made in unison.

### Sub-Committee input

SECAS will engage with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Privacy Sub-Committee (PSC), the Testing Advisory Group (TAG), and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

| Sub-Committee input |                                                                              |
|---------------------|------------------------------------------------------------------------------|
| Sub-Committee       | Input sought                                                                 |
| OPSG                | Assess any potential operation impacts as a result of the potential solution |
| SMKI PMA            | Assess any potential operation impacts as a result of the potential solution |
| SSC                 | Assess any potential operation impacts as a result of the potential solution |
| TABASC              | Assess any potential operation impacts as a result of the potential solution |
| PSC                 | Assess any potential operation impacts as a result of the potential solution |
| TAG                 | Assess any potential operation impacts as a result of the potential solution |

## Appendix 1: Progression timetable

| Timetable                                   |                          |
|---------------------------------------------|--------------------------|
| Event/Action                                | Date                     |
| Draft Proposal raised                       | 9 September 2025         |
| <i>Presented to CSC for initial comment</i> | <i>16 September 2025</i> |
| <i>Presented to TABASC</i>                  | <i>2 October 2025</i>    |
| <i>Presented to SMKI PMA</i>                | <i>8 October 2025</i>    |
| <i>Presented to SSC</i>                     | <i>8 October 2025</i>    |
| <i>Presented to OPSG</i>                    | <i>14 October 2025</i>   |
| <i>Presented to PSC</i>                     | <i>23 October 2025</i>   |
| <i>Presented to TAG</i>                     | <i>29 October 2025</i>   |
| <i>Working Group</i>                        | <i>5 November 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                                                      |
| CoS      | Change of Supplier                                             |
| CSC      | Change Sub-Committee                                           |
| CSS      | Central Switching Service                                      |
| DCC      | Data Communications Company                                    |
| DUIS     | DCC User Interface Specification                               |
| OPSG     | Operations Group                                               |
| PID      | Performance Indicators Document                                |
| PSC      | Privacy Sub-Committee                                          |
| REC      | Retail Energy Code                                             |
| RTT      | Round Trip Time                                                |
| SEC      | Smart Energy Code                                              |
| SECAS    | The Smart Energy Code Administrator and Secretariat            |
| SMKI PMA | Smart Metering Key Infrastructure Policy Management Authority  |
| SMS      | Smart Metering System                                          |
| SR       | Service Request                                                |
| SRV      | Service Reference Variant                                      |
| SSC      | Security Sub-Committee                                         |
| TABASC   | Technical Architecture and Business Architecture Sub-Committee |
| TAG      | Testing Assurance Group                                        |
| TRT      | Target Response Time                                           |