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DP307 'Extension of MP219 'Accessing Consumption Data on behalf of SEC Parties' concept to section I 1.3'

Modification Report

Version 0.1

11 November 2025

Corporate member of
Plain English Campaign
Committed to clearer
communication

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About this document

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

This proposal has been raised by Tereza Borges from n3rgy data limited.

The implementation of [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#) has allowed contracted Other Users who are acting on behalf of Suppliers to obtain Consumption Data without collecting the Unambiguous Consent of the Energy Consumer. This does not allow contracted Other Users to send either a 'Join Service' or 'Unjoin Service' Request to a Smart Meter or associated Device. SEC Section I 1.3 'Service Requests' states that in order to do so a User must either be the Responsible Supplier or have obtained Unambiguous Consent from the Consumer.

This issue is resulting in the full benefits of MP219 not being realised by the industry or Consumers as Other Users still need to obtain unambiguous consent for 'Join' and 'Unjoin' activities but not for Consumption Data.

The Proposer would like to extend the concept of MP219 to SEC Section I1.3 'Service Requests'

2. Issue

What are the current arrangements?

SEC Section I 1.3 'Service Requests' states that a User will not send either a 'Join Service' or 'Unjoin Service' Request to a Smart Meter or associated Device unless the User is the Responsible Supplier or the Consumer has given the User Unambiguous Consent.

Service Requests

- I1.3 Each User undertakes that it will not send either a 'Join Service' or 'Unjoin Service' Service Request (respectively to join a Type 2 Device to, or unjoin it from, any Smart Meter or Device Associated with a Smart Meter) unless:*
- (a) the User is the Responsible Supplier for the Smart Meter or Associated Device to which the Service Request is sent, and sends that Service Request for the purpose of complying with an obligation under its Energy Supply Licence; or*
 - (b) the Energy Consumer at the premises at which the Smart Meter is located has given the User Unambiguous Consent, which has not been withdrawn, to (as the case may be):*
 - (I) join that Type 2 Device to the Smart Meter or Associated Device, and the User has clearly informed the Energy Consumer before obtaining such Unambiguous Consent that a consequence of joining the Type 2 Device may be that Data relating to the Energy Consumer will be shared with third parties; or*
 - (II) unjoin it from the Smart Meter or Associated Device, save that the Responsible Supplier for a Smart Metering System at the premises need not obtain such Unambiguous Consent where it has reasonable grounds to believe that the Type 2 Device has Compromised or is likely to Compromise any Device forming part of that Smart Metering System (and the Responsible Supplier shall, where it unjoins a Type*

2 Device in such circumstances, take all reasonable steps to inform the Energy Consumer that it has done so).

What is the issue?

[MP219 'Accessing Consumption Data on behalf of SEC Parties'](#) implemented 19 May 2025 made changes to SEC Section I1.2 'Data Privacy' amending the definition of 'Appropriate Permission' to allow contracted Other Users who are acting on behalf of Import Suppliers, Export Suppliers, Gas Suppliers, Electricity Distributors and Gas Transporters to obtain Consumption Data without collecting the Unambiguous Consent of the Energy Consumer.

As Other Users have started to work with energy Suppliers to operationalise the application of MP219, the natural applicability of the same concept to the Join/Unjoin services (SEC section I1.3 'Service Requests') has become apparent.

What is the impact this is having?

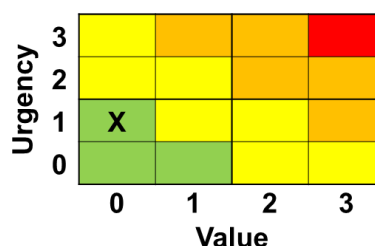
This is resulting in confusion and limiting the benefits of MP219 for the industry as Other Users still need to obtain unambiguous consent for 'Join' and 'Unjoin' activities but not for Consumption Data.

Impact on consumers

Industry benefits may not be realised which could impact future Consumer offerings.

What is the priority of this Issue?

This Issue has a priority score of *Low*. This rating is based on the following factors:



These scores have been allocated based on the below factors:

- This change will better enable emerging use cases, including demand-side response, time-of-use and flexible tariff models, and remote device configuration and management.
- This change Improves the process for Other Users not requiring unambiguous consent to be gained.

3. Assessment of the proposal

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC), the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA), the Privacy Sub-Committee (PSC), the Testing Assurance Group (TAG), and the Performance Assurance Board (PAB) 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	Operational impacts from extending MP219 concept to SEC section I1.3
PAB	We do not believe this modification will have any PAB impacts
PSC	Privacy impacts due to extending MP219 concept to SEC section I1.3
SMKI PMA	We do not believe this modification will have any SMKI impacts
SSC	Security impacts from extending MP219 concept to SEC section I1.3
TABASC	We do not believe there will be any TABASC impacts.
TAG	We do not believe this modification will have any Testing impacts

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	12 Nov 2025
Presented to CSC for initial comment	18 Nov 2025
<i>CSC agrees to progress to Refinement</i>	<i>18 Nov 2025</i>
<i>Modification discussed with Sub-Committees</i>	<i>Feb 2026</i>
<i>Refinement Consultation</i>	<i>March 2026</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
CSC	Change Sub-Committee
OPSG	Operations Group
PAB	Performance Assurance Board
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Assurance Group