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# DP310

## 'Trial Device Assurance Certificate'

### Modification Report

Version 0.1

9 December 2025



## About this document

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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) required to deliver the Proposed Solution.

## Contact

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If you have any questions on this modification, please contact:

**Khaleda Hussain**

020 770 6719

[Khaleda.Hussain@talan.com](mailto:Khaleda.Hussain@talan.com)

## 1. Summary

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This proposal has been raised by Gordon Hextall from the Security Sub-Committee (SSC).

The SSC and the Central Products List (CPL) team have discussed how to address challenges faced when processing CPL entries for Trial Device Models. When SEC Section F 'Smart Metering System Requirements' was introduced to the SEC, the SSC intended for Clause F2.19 to be able to accept existing ZigBee and Device Language Message Specification (DLMS) Certificates as the necessary Assurance Certificates, where Trial Device Models are based on existing Devices already on the CPL. SEC Section Clause F2.19 does not specify 'new Assurance Certificates' are required.

SECAS, who are responsible for processing CPL entries, have been requesting a new ZigBee Certificate for such Devices, even when the trial is (for example) for just five Trial Device Models, for a three month trial which are in a Supplier lab as opposed to a consumer's premises and are based on a well-established Device already listed on the CPL and with no changes to the ZigBee stack. The purpose of this SEC modification is to clarify the original intent of SEC Section F Clause F2.19. The impact of not resolving this issue will mean delays in Trial Device Models start dates, which could consequently lead to a backlog of Devices requiring approval.

This modification will have no direct impacts on any SEC Parties but will give greater clarity and transparency to SEC Section F. Implementation costs are limited to SECAS time and effort to update the SEC. SECAS is targeting an implementation date in line with the February 2026 SEC Release. This is a Fast-Track Self-Governance modification.

## 2. Issue

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### What are the current arrangements?

SEC Section F Clause F2.19 specifies:

#### Device Trials

F2.19 In its application for Trial Device Approval, the applicant Manufacturer must evidence that the Smart Metering Equipment Technical Specification (SMETS)2+ Device Model for which it is seeking approval has all Assurance Certificates other than a Commercial Product Assurance (CPA) Certificate issued by the CPA Scheme Operator.

When the SEC legal drafting was introduced for SEC Section F, the SSC intended for Clause F2.19 to be able to accept existing ZigBee and DLMS Certificates as the necessary Assurance Certificates, where Trial Device Models are based on existing Devices already on the CPL. SEC Section F Clause F2.19 does not specify 'new Assurance Certificates' are required.

### What is the issue?

SECAS, who are responsible for processing CPL entries, have been requesting a new ZigBee Certificate for such Devices, particularly for five Trial Device Models which are in a Supplier lab as opposed to a consumer's premises. The purpose of this SEC modification is to clarify the original intent of SEC Section F Clause F2.19.

### What is the impact this is having?

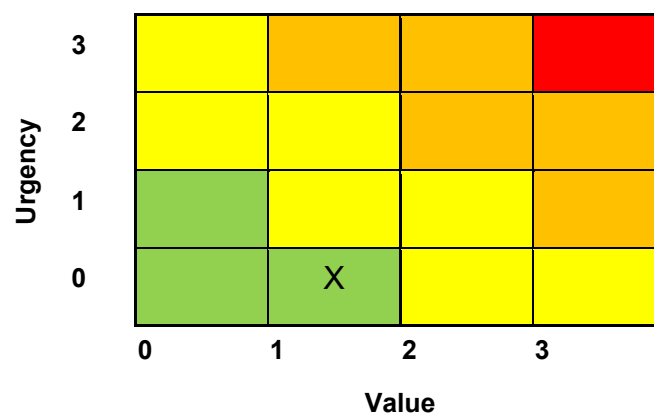
If the intent of Trial Device Models remains unclarified, a requirement to obtain a new Zigbee Certificate for Trial Device Models would remain in place, potentially causing severe delays relating to Trial Device Models start dates. The SSC have currently approved 13 Trial Device Models, and with the upcoming Virtual Wide Area Network (VWAN) introduction and Trust Centre Swap Outs dates approaching, there is a likelihood of increased Trial Device Models requiring certification.

### Impact on consumers

There is no impact on consumers as a result of this modification.

### What is the priority of this Modification?

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



These scores have been allocated based on the below factors:

- The Proposed Solution would provide clarity to the requirements within SEC Section F Clause F2.19.

## 3. Solution

### Proposed Solution

The Proposed Solution is to make text-only changes to SEC Section F with the aim of providing clarity and to avoid any ambiguity and misinterpretation. Currently, the SSC and SECAS Security team have agreed a workaround whereby the SSC provides a formal Letter of Authority to use the existing ZigBee Certificates pending the potential implementation of the Proposed Solution. This has helped unblock any delayed trials for now.

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

## 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 delays to the Trial Device Models will be prevented.

### DCC System

This modification does not impact the DCC Systems.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- SEC Section F 'Smart Metering System Requirements'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

### Technical specification versions

This modification does not include any technical specifications.

### 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

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### 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. Agreed Implementation approach

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### Recommended implementation approach

SECAS is recommending an implementation date of:

- **26 February 2026** (February 2026 SEC Release) if a decision to approve is received on or before 5 February 2026; or
- **25 June 2026** (June 2026 SEC Release) after 5 February 2026 but on or before 4 June 2026.

The modification needs to be implemented as soon as reasonably practicable as the SSC have approved several Trial Device Models. The February 2026 SEC Release is next viable SEC Release in which to aim for implementation.

As this is a Fast Track Self Governance Modification, the Change Sub-Committee will be asked to vote to approve or reject the Proposed Solution on 16 December 2025.

## 7. Case for change

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### Business case

This modification will address inconsistencies and points of potential confusion or misinterpretation with minimal 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)<sup>1</sup> 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 inconsistencies and points of potential confusion or misinterpretation. There are no DCC costs and only a minimal SECAS cost to implement.

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<sup>1</sup> To facilitate the efficient and transparent administration and implementation of this Code.

## Appendix 1: Progression timetable

| Timetable                                             |                    |
|-------------------------------------------------------|--------------------|
| Event/Action                                          | Date               |
| Draft Proposal raised                                 | 18 Oct 2025        |
| <i>Fast-Track Modification Report approved by CSC</i> | <i>16 Dec 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                                        |
| CPA      | Commercial Product Assurance                     |
| CPL      | Central Products List                            |
| CSC      | Change Sub-Committee                             |
| DLMS     | Device Language Message Specification            |
| SEC      | Smart Energy Code                                |
| SECAS    | Smart Energy Code Administrator and Secretariat  |
| SMETS    | Smart Metering Equipment Technical Specification |
| SSC      | Security Sub Committee                           |
| VWAN     | Virtual Wide Area Network                        |