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DP313

'Remove the DCC requirement to delete CHs from the SMI'

Modification Report

Version 0.1

9 December 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 Joey Manners from Octopus Energy.

The Data Communications Company (DCC) have a requirement to remove Devices from the Smart Metering Inventory (SMI) that have remained in a 'Pending' status for 36 months.

Suppliers have existing processes to manage the re-prenotification of Smart Meters and consumer displays that go through this removal process, however there are no established processes for the re-prenotification of Communications Hubs (CH) that have been removed by the DCC.

Suppliers believe that if DCC Users are required to pre-notify CHs that have been removed after 36 months of being 'Pending', this would likely incur cost to those Parties in order to create new processes, and that it could lead to a potential increase in failed installations.

Any potential costs associated for a Proposed Solution, and any potential targeted release dates, are yet to be determined.

2. Issue

What are the current arrangements?

The DCC have a requirement to remove Devices from the SMI that have remained in a 'pending' status for 36 months. This is outlined within Smart Energy Code (SEC) Appendix AC ‘Inventory, Enrolment and Decommission Procedures’ Clause 8.2:

‘*Where the SMI Status of a Device has remained as 'pending' for 36 months, then the DCC shall remove the Device from the Smart Metering Inventory*’.

What is the issue?

Suppliers have existing processes to manage the re-prenotification of Smart Meters and consumer displays that go through this removal process, however there are no established processes for the re-prenotification of CHs that have been removed by the DCC.

Following the Technical Architecture & Business Architecture Sub-Committee (TABASC) 119 meeting on 6 December 2025, an action was agreed to raise a new issue for a modification within the SEC.

What is the impact this is having?

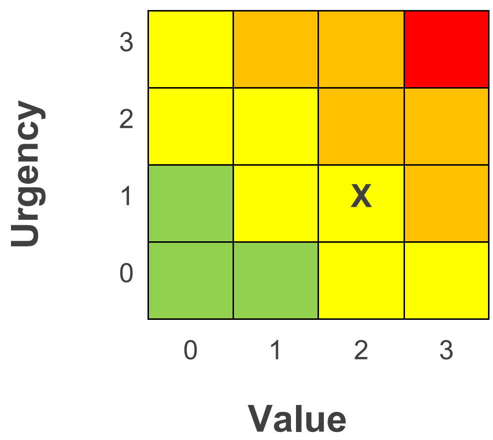
As part of the TABASC 119 meeting discussion, it was agreed that if DCC Users are required to pre-notify CHs that have been removed after 36 months of 'Pending', this would likely incur cost to those Parties in order to create new processes, and that it could lead to a potential increase in failed installations. This would be due to the complexity of coordinating the prenotification of CHs between engineers on-site and back-office teams when attempting to install a removed CH.

Impact on consumers

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

What is the priority of this modification?

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



- **Operational Performance**: If this issue were not to be addressed, DCC Users, more specifically Suppliers, believe there will be a substantial impact to processes and operational performance if they were to take on the pre-notification of CHs removed from the SMI after sustaining a pending status of more than 36 months.
- **Cost Benefit**: Suppliers have noted there will be costs associated with establishing processes to manage this workload, as well as potential resource issues.

Please refer to Appendix 3 for a full breakdown of how the priority score was calculated.

3. Assessment of the proposal

Areas for assessment

December 2025 Issues Group Outcome

Following the December 2025 Issues Group discussion, the Issues Group advised this issue is worthy of proceeding to a modification. As part of this discussion, the Issues Group recommended the Smart Energy Code Administrator & Secretariat (SECAS) attend a future TABASC and Security Sub-Committee (SSC) meeting to gain further industry input and clarity of the issue.

Sub-Committee input

SECAS will engage the Chairs from the Operations Group (OPSG), the TABASC, the 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	*There is no operational impact as a result of this modification.*
PSC	*There is no privacy impact as a result of this modification.*
SMKI PMA	*There is no key infrastructure impact as a result of this modification.*
SSC	Assess any potential security impacts as a result of this issue.
TABASC	Assess any technical or business impacts as a result of this issue.
TAG	*There is no key testing impact as a result of this modification.*

Appendix 1: Progression timetable

Timetable	
Event/Action	**Date**
Draft Proposal raised	9 Dec 2025
Presented to the Change Sub-Committee (CSC) for initial comment	*16 Dec 2025*
CSC converts Draft Proposal to Modification Proposal	*16 Dec 2025*
Presented to the TABASC	*5 Feb 2026*
Presented to the SSC	*11 Feb 2026*
Refinement Consultation	*25 Feb 2026 – 18 Mar 2026*
Presented to the Working Group	*1 Apr 2026*
Presented to CSC for progression to Report Phase	*21 Apr 2026*
Modification Report Consultation	*22 Apr 2026 – 13 May 2026*
Change Board Final Vote	*20 May 2026*

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**
CH	Communications Hub
CSC	Change Sub-Committee
DCC	Data Communications Company
OPSG	Operations Group
PSC	Privacy Sub-Committee
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator & Secretariat

Glossary	
Acronym	**Full term**
SMI	Smart Metering Inventory
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture & Business Architecture Sub-Committee
TAG	Testing Advisory Group

Appendix 3: Prioritisation Matrix

Prioritisation Matrix[1]							
Legal & regulatory compliance[i]	**Operational performance[ii]**	**Cost benefit[iii]**	**Consumer impact[iv]**	**Security impacts[v]**	**Value**	**Urgency**	**Priority**
0	**3**	**1**	**0**	**0**	**2**	**1**	**Medium**

Operational Performance: If this issue were not to be addressed, DCC Users, more specifically Suppliers, believe there will be a substantial impact to processes and operational performance if they were to take on the pre-notification of CHs removed from the SMI after sustaining a pending status of more than 36 months.

Cost Benefit: Suppliers have noted there will be costs associated with establishing processes to manage this workload, as well as potential resource issues.

[i] Ensure that Parties (including the DCC) meet the obligations of all relevant laws, regulations and licence obligations
[ii] Deliver performance improvements enhancing speed, quality, costs, flexibility and dependability
[iii] Realise financial benefits compared to the cost of the change and the impact of doing nothing
[iv] Meet or enhance consumer and end user needs and expectations through offering better services
[v] Deliver or enhance the smart metering security arrangements or reduce the risk of a security incident arising

[1] The impact or improvement in each area is measured on a 0-1-2-3 rating system, where 0 is equal to no expected impact or improvement and 3 is equal to a major expected impact or improvement.