SEC
Smart Energy Code

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Smart Energy Code

DP321
'Managing SEC Party Organisation Changes'

Modification Report

Version 0.1

12 May 2026

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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach 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 Tony Pile from Landis+Gyr Ltd.

Currently, when a company wishes to become a Smart Energy Code (SEC) Party, it must complete a formal accession process, which is outlined in SEC Section B ‘Accession’. However, if an existing SEC Party changes its corporate identity e.g. its name, there are no provisions within the SEC that would facilitate this. Instead, the company would need to re-access to the SEC as a new Party. This would create new SEC Party identifiers, leading to mismatches with existing Devices linked to the old identifiers. If not resolved, this could negatively impact Devices and potentially affect consumers. The costs of this change are not yet known, and the implementation approach will be developed as the proposal progresses. This is a Self-Governance modification.

2. Issue

What are the current arrangements?

When an industry party wishes to become a SEC Party, they must undergo the SEC Accession process outlined in SEC Section B ‘Accession’. This entails entering into an Accession Agreement and being legally bound to ahead to the entire SEC framework. Once Accession is completed, the SEC Party will be assigned a SEC identification number and other relevant identifiers.

What is the issue?

If a SEC Party decides to undergo a change of corporate identity, the SEC currently does not have any provisions to make this a quick and efficient process, requiring said Party to undergo the full SEC Accession process again under the new identity.

What is the impact this is having?

If a SEC Party going through a corporate identity change is required to enter into the full SEC Accession process under the new identity, this will generate a new SEC ID and relevant identifiers. This then creates a disconnect between the original SEC Party identifiers, associated with deployed Devices, and new SEC Party identifiers associated with subsequent Devices and firmware. This disconnect creates various challenges, including an inability to apply firmware upgrades to deployed Devices.

Under the current arrangements, the organisation with the new SEC Party ID will have a new Smart Metering Key Infrastructure (SMKI) identity and Manufacturer ID. As the Manufacturer ID is associated with both Device hardware and firmware within Data Communications Company (DCC) systems, and the firmware validation process requires an ID match, this would lead to a block on adding new firmware to Devices via Over the Air (OTA) upgrades.

If nothing is done, deployed Devices would be stranded on current firmware, and it would not be possible to resolve bugs or deploy specification updates. Where a new manufacturer SMKI identity and Manufacturer ID is applied to an existing Manufacturer, this would also create change requirements and complexity for Energy Suppliers in the management of their Device portfolio.

Impact on consumers

If SEC Parties are unable to communicate with their Device portfolio as a result of this issue, then consumers could be adversely affected. This could be as a result of outdated firmware on Devices, leaving Parties unable to rectify issues for their consumers.

What is the priority of this modification?

The priority of this modification has been determined as **Standard**. This rating is based on perceived impacts on:

- Consumers, Vulnerability and Priority Services Register (PSR).
- Non-Domestic Retail Policy.
- Smart & Retail Operations.

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

3. Solution

Potential Solution

The Proposer seeks to introduce a process supporting an existing SEC Party due to undergo an organisational change that would result in the creation of a new corporate identity requiring SEC Party status. The new process would require an application be submitted to the SEC Panel for approval to transfer the Party's existing SEC Party rights to the new corporate identity.

This solution would only apply in the scenario that a straightforward swap of rights from one corporate identity to the new identity would occur, as this would not cause any need for change elsewhere in the Smart Metering ecosystem.

However, if a SEC Party is wishing to make amendments to their current SEC Party role, e.g. acting in the capacity of another SEC Party type that they are not currently fulfilling, then they would need to follow the established SEC Accession process.

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

SEC Party Categories impacted			
✓	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
✓	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers	✓	Flexibility Providers
✓	DCC Other Users	✓	MAPs/ MAMs

All SEC Parties would be impacted by this change, as the Proposed Solution would be open to all SEC Parties undergoing an organisational change where they wish to simply swap their SEC Party rights over from their existing corporate identity to the new identity.

DCC Systems

DCC System changes

It is not believed that there will be any changes required to the Data Communications Company (DCC) System as a result of the Proposed Solution. This will be confirmed throughout the development of the modification.

DCC System traffic

There would be no impact on DCC System traffic as a result of this modification.

SEC and subsidiary documents

The SEC documents impacted by this modification will be updated as this modification progresses.

Devices

Devices will not be impacted as a result of this modification. However, the implementation of the solution would have a positive impact on Devices, as SEC Parties will keep their existing SEC Party ID paired with their relevant Devices.

Consumers

If SEC Parties are unable to communicate with their Device portfolio as a result of this issue, then consumers could be adversely affected. This could be as a result of outdated firmware on Devices, leaving Parties unable to rectify issues for their consumers.

Other industry Codes

There are no impacts on other industry Codes as a result of this modification.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions as a result of this modification.

5. Costs

Any costs associated with this modification will be updated as the modification progresses.

6. Implementation approach

The implementation approach will be established and updated as the modification progresses.

7. Assessment of the proposal

Sub-Committee input

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

Sub-Committee input	
Sub-Committee	**Input sought**
OPSG	**Feedback required on any potential operational impacts.**
PAB	No input required.
PSC	No input required.
SMKI PMA	**Feedback required on any potential SMKI impacts.**
SSC	No input required.
TABASC	**Feedback required on any potential technical impacts.**
TAG	No input required.

Appendix 1: Progression timetable

Timetable	
Event/Action	**Date**
Draft Proposal raised	12 May 2026
Presented to Change Sub-Committee (CSC) for initial comment	*19 May 2026*
CSC converts Draft Proposal to Modification Proposal	*19 May 2026*
Modification discussed with Working Group	*3 Jun 2026*
Modification discussed with OPSG	*9 Jun 2026*
Modification discussed with TABASC	*2 Jul 2026*
Modification discussed with SMKI PMA	*8 Jul 2026*
Refinement Consultation	*20 Jul 2026 – 10 Aug 2026*
Modification discussed with Working Group	*2 Sep 2026*
Modification Report approved by CSC	*15 Sep 2026*
Modification Report Consultation	*16 Sep 2026 – 6 Oct 2026*
Change Board Vote	*21 Oct 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**
BAU	Business As Usual
CSC	Change Sub-Committee
DCC	Data Communications Company
MAM	Meter Asset Manufacturer
MAP	Meter Asset Provider
OPSG	Operations Group
OTA	Over the Air
PAB	Performance Assurance Board
PSC	Privacy Sub-Committee
PSR	Priority Services Register
SDS	Strategic Direction Statement
SEC	Smart Energy Code
SMKI	Smart Metering Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SSC	Security Sub-Committee

Glossary	
Acronym	**Full term**
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group

Appendix 3: Prioritisation

Strategic Direction Statement Prioritisation				
SDS Alignment	**Importance**	**Complexity**	**Overall Total**	**Priority**
2	2	1	5	STANDARD

SDS Alignment – The Proposed Solution of this modification would support three aspects of the SDS, which are:

- Consumers, Vulnerability and PSR.
- Non-Domestic Retail Policy.
- Smart & Retail Operations.

Importance – The Proposed Solution would resolve any future iterations of this issue arising and would address a gap within the SEC relating to organisational changes within SEC Parties.

Complexity – This would be a text-only change to the SEC and therefore is believed to be a straightforward change.