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MP169

‘Managing SEC Obligations and the Consumer’s Right to refuse a Smart Meter’

Modification Report

Version 0.7

14 February 2024



About this document

This document is a draft 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. This document will be updated as this modification progresses.

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This document also has four annexes:

- **Annex A** contains the business requirements for the proposed solution.
- **Annex B** contains the second iteration of the DCC Preliminary Assessment.
- **Annex C** contains the collated responses to the Refinement Consultation.
- **Annex D** contains a list of the Service Requests which will be permitted to Devices which have a Restricted Flag set.

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1. Summary

This proposal has been raised by Emslie Law of OVO Energy.

Currently, Energy Consumers can refuse to have a Smart Meter installed at their property. Suppliers are receiving requests from consumers to have a Smart Meter installed in 'dumb mode', where the smart functionality on the Device is turned off. If a Supplier wishes to comply with this request, they cannot do so without impacting obligations within the Smart Energy Code (SEC).

introduce a 'Restricted' mode which would be applicable to Smart Metering Equipment Technical Specifications (SMETS)2+ Devices in credit mode. This would limit the Service Reference Variants (SRVs) and Alerts which can be delivered to these Devices. This represents an additional step to the existing 'all reasonable steps' that Suppliers must take to attempt the successful installation of a fully communicative Smart Metering System.

The second iteration of the DCC Preliminary Assessment received in September 2023 estimated costs between £351,000 and £750,000.

This modification will have an impact on Suppliers, Electricity Network Operators, Gas Network Operators, DCC, Meter Installers, Flexibility Providers and Shared Resource Providers. It will have impacts on the DCC System and will proceed as an Authority-Determined modification. SECAS is targeting this modification for inclusion in the June 2025 SEC Release.

2. Issue

What are the current arrangements?

Currently a consumer has a legal right to refuse a Smart Meter. Some consumers may not want a Smart Meter due to concerns about radio frequency signals, data privacy or other general matters. In some instances, consumers are approaching their Supplier to have a Smart Meter installed in 'dumb' mode to allow for the communications to be limited or 'disabled'. However, there is currently no way to do this without impacting other obligations within the SEC.

The Gas and Electricity Supply Licences (Condition 54.9) states:

Where this paragraph applies the licensee must take all reasonable steps to ensure that the Electricity Meter and Communications Hub Function that form part of the SMETS2+ Smart Metering System at the SMETS2+ premises are Commissioned and the SMETS2+ Smart Metering System Enrolled.

In addition, SEC Appendix AC 'Inventory, Enrolment and Decommissioning Procedures' sets out the pre-commissioning and post-commissioning obligations on the Supplier. These include obliging an Installing Supplier to carry out numerous tasks to ensure a Smart Metering System is installed and communicating. This includes placing Smart Metering Key Infrastructure (SMKI) keys and Certificates on the Devices so other Parties can communicate with them. It also includes updating the DCC with the state of the Devices.

What is the issue?

Suppliers are unable to comply with consumer requests to install a Smart Meter in 'dumb' mode. The SEC does not allow for the Devices on the Smart Metering Inventory (SMI) to be either installed and not commissioned (this is a transient state and not an enduring one) or to fit the meters without also fitting the DCC-provided Communications Hub (as referenced above in Gas and Electricity Supply Licence Condition 54.9). There is no concept, by design, of fitting a Smart Meter in 'dumb' mode.

Suppliers are currently either installing heritage meters or installing the Smart Meter in ways that are causing or will cause problems elsewhere.

Some of the factors that will need consideration as part of any solution are listed in the following table:

Additional issues with non-communicating meters	
Issue for consideration	Details
Any form of Load (Heating / Hot Water / Electric Vehicle)	Any consumer on an Economy 7 tariff (or similar) arrangement relies on the Smart Meter communicating.
Change of Mode (Credit to Prepayment and vice versa)	A 'dumb' meter cannot be changed between modes remotely – such a change will need a site visit.
Availability of Heritage Meters	Heritage meters are no longer being made in some circumstances and stocks are running low.
Supplier Licence Requirements	The Installing Supplier is required to configure and maintain a tariff on the system.
Security and Safety Alerts.	The Smart Metering solution is designed for Security and Safety Alerts to be provided and sent out. This is part of the benefits case and solution in place for Distribution Network Operators (DNOs). These can't be sent if the meter is in 'dumb' mode.
Critical Alerts	SEC Parties are required to act on specific critical or mandated Alerts. These can't be sent if the meter is in 'dumb' mode.
'Dumb' meters will need manual reads	It is likely Suppliers will no longer have meter reading agents, especially for a Smart Meter, so may need the customer to provide reads themselves. Smart Meter displays contain more screens and information and the potential for the customer reading the wrong data is therefore increased. There are also billing implications that the Smart Metering solution is designed to address.
Eligibility and non-eligibility	Potential Network Managed sites with no Wide Area Network (WAN) and those on specific Radio TeleSwitched regimes must have communications. This is not within the remit of the SEC.
DCC / DNO flagging the meter as non-communicating	The DNO currently raises non-communicating Smart Meters with the Supplier to 'fix'. The DCC may report these as 'notcommissioned'.
Supplier taking on a meter not recorded in the SMI as smart	If a Supplier takes on a meter that isn't recorded as 'smart', it may require that meter to be replaced, which will incur Premature Replacement Charges for Suppliers.
Industry standard	A new way to manage installs of Smart Meters set to 'dumb' mode must be standardised across the industry so that Change of Supplier (CoS) is not impacted, and the new gaining Supplier is aware of the customer preference and situation. There is currently no flag or state to highlight this.

What is the impact this is having?

There is no concept of a 'dumb' state for a Smart Meter within the SEC. Where a functioning Smart system is installed (and maybe commissioned) in a 'dumb' state, that state is not visible and understood by the industry. Consequently, on a CoS and Change of Tenancy (CoT) there is currently a requirement to 'fix' the install, leading to additional costs, inconvenience and inefficiencies. Currently the consumer's legal right to refuse a Smart Meter cannot be met while still meeting the New and Replacement obligations on the Supplier. This will become increasingly difficult as heritage meters become less available.

Impact on consumers

Currently the consumer's right to refuse a Smart Meter cannot be met as an enduring process unless Suppliers are deliberately not compliant with the SEC and Supply Licence Conditions.

3. Solution

Proposed Solution

The Proposed Solution is to introduce a 'Restricted' mode to be applicable to Devices which are SMETS2+ only and in credit mode. This will mean that there will be a Data Service Provider (DSP) System flag which indicates that a Smart Meter has restricted communications due to consumer choice.

There will also be a mechanism via the Self-Service Interface (SSI)/ Self-Service Management Interface (SSMI) whereby a Supplier can set or clear the 'Restricted' mode for a meter. This will limit the SRVs which can be delivered to and from 'Restricted' Devices.

Communication Service Providers (CSPs) will also introduce reporting functionality to ensure 'Restricted' Devices are not included in relevant monthly performance measures.

This change will introduce an additional step to 'all reasonable steps' which can only be taken after the current all reasonable steps have been exhausted.

Further information about the Proposed Solution can be found in the DCC Preliminary Assessment in Annex B.

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

Breakdown of Other SEC Party types impacted			
✓	Shared Resource Providers	✓	Meter Installers
	Device Manufacturers	✓	Flexibility Providers

This modification will impact any Party which can send Service Requests to Devices which relate to retrieval of Device Consumption Data.

Suppliers

This modification introduces an additional step, which can be taken after the current all reasonable steps have been taken, for Suppliers to offer to consumers who do not wish to have a Smart Meter installed.

During the Refinement Consultation, Parties noted that Suppliers would need to develop new processes and policies when installing meters in Restricted mode. One change highlighted by several Parties was the necessity to change communications and processes for customers which have a Smart Meter operating in Restricted mode, for data privacy or billing purposes. Although not included in the proposed solution, SECAS questioned Parties on whether they believed the flag should be set via the SSI or via a Service Request, which would come at an increased cost. Parties responded noting that if a Service Request was used they would need to modify their Smart Meter Adaptor functionality.

Due to the alteration to existing arrangements for installing Smart Meters, Suppliers and Meter Installers would need to provide updated training to their meter engineers. Suppliers would also need to alter the training provided to customer service staff, in addition to revising information they provide to Consumers.

DCC System

Changes will be required in the DSP System to ensure that messages relating to Consumption Data are prevented from processing. There will also be changes to the DCC's reporting to reflect that certain targets will no longer be applicable for processes on Devices with reduced communications.

The expected impacts on DCC Systems and DCC's proposed testing approach can be found in the DCC Preliminary Assessment in Annex B.

SEC and subsidiary documents

The following parts of the SEC are expected to be impacted:

- Appendix AC 'Inventory, Enrolment and Decommissioning Procedures'
- Appendix AD 'DCC User Interface Specification (DUIS)'
- Section H 'DCC Services'

Devices

Devices impacted			
✓	Electricity Smart Metering Equipment	✓	Gas Smart Metering Equipment
✓	Communications Hubs	✓	Gas Proxy Functions
	In-Home Displays		Prepayment Meter Interface Devices
	Standalone Auxiliary Proportional Controllers		Home Area Network Connected Auxiliary Load Control Switches
	Consumer Access Devices		Alternative Home Area Network Devices

There will be no changes to Devices required to implement this modification. There will be changes to DCC interaction with Smart Meters, their associated Communications Hubs and Gas Proxy Functions (GPFs), as well as how these interactions are reported against by the DCC.

Consumers

This modification will have a positive impact on consumers who do not wish to have a Smart Meter due to data privacy concerns, as it will allow them to receive the other benefits of Smart Metering while respecting their right to refusing to share their Consumption Data. It will also help to ensure that there are more smart-capable Devices installed at consumer premises, giving more options to incoming tenants.

The Proposed Solution to this modification will only be applied to credit consumers. This is because the Service Requests which cannot be requested from 'Restricted' Devices would impact many pre-payment processes and therefore would not be workable under the solution.

Other industry Codes

This modification may have an impact on the Retail Energy Code (REC). This is being investigated and this report will be updated as further information is available.

Greenhouse gas emissions

This modification will reduce the need to maintain replacement stock for heritage meters by increasing the number of smart-capable meters installed at consumer premises. It will also ensure that consumers who do not want a Smart Meter will have options which don't require Device replacement or scrappage.

5. Costs

DCC costs

The estimated DCC implementation costs to implement this modification is between £351,000 and £750,000.

The breakdown of these costs are as follows:

Breakdown of DCC implementation costs	
Activity	Cost
Design, Build and PIT	£351,000 - £750,000
Systems Integration Testing (SIT)	TBC
User Integration Testing (UIT)	TBC
Implement to Live	TBC
Application Support	TBC

The cost of a DCC Full Impact Assessment is £16,684 and would be completed within 30 working days of the SECAS request. This would show the costs of SIT, UIT and Implementation to Live.

SECAS costs

The estimated SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. 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

SEC Parties will need to amend processes to manage the use of a Restricted flag. These could be manual or automated depending on the choices of the SEC Party. During the Refinement Consultation, one Party noted that if a Service Request was used to set a Device in Restricted mode, this would require changes to their smart meter adaptor would cost between £100,000 and £250,000. One other respondent to the Refinement Consultation believed that implementation of this modification would lead to costs of over £1,000,000. They commented that MP169 would lead to a reduction in the business benefits gained by Suppliers which arise from installing a Smart Meter.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **27 June 2025** (June 2025 SEC Release) if a decision to approve is received on or before 25 September 2024: or
- **7 November 2025** (November 2025 SEC Release) if a decision to approve is received after 25 September 2024 but on or before but on or before 6 February 2025.

In the Preliminary Assessment the DCC noted they would require a lead time of 6 months for Design, Build and PIT. Further time will also be needed for SIT. As the February 2025 SEC Release consists of only SEC documentation changes, the June 2025 SEC Release is the earliest Release which this modification can be implemented.

7. Assessment of the proposal

Observations on the issue

Change Sub-Committee views

The Change Sub-Committee (CSC) noted possible cross-Code changes from any solution, highlighting that a change to the D0350 data flow could be needed. Another member agreed this issue needs to be examined and considered this is likely to be a difficult solution to develop. SECAS are investigating this issue and may raise this for discussion at the Cross-Code Steering Group (CCSG).

TABASC views

The Technical Architecture and Business Architecture Sub-Committee (TABASC) questioned how many consumers did not want a Smart Meter. The Proposer reported that it is difficult to calculate a figure. This is because the consumer may not clearly state they don't want a Smart Meter or provide a reason but can continually cancel installation appointments.

Citizens Advice views

SECAS has engaged with Citizens Advice throughout the modification process to understand their views on the modification. Citizens Advice have provided this statement:

"For the small proportion of consumers who do not want a Smart Meter there needs to be some means to handle meter replacements when legacy meters are no longer available. This solution was agreed upon early in the rollout and is reflected in Ombudsman decisions and Citizens Advice guidance as well as the communications materials of several Suppliers who assure consumers that their meter can be set to not send data. This modification simply codifies a functionality that has long been promised and used to reassure consumers. The current situation where different Suppliers handle this issue differently is not tenable."

Without this modification and a route for such consumers it would be the case that smart has effectively become mandatory. We would have to change our messaging around the mandatory nature of the rollout accordingly. This would be a big change that would likely generate a lot of negative attention for the rollout. As such, we are supportive of approval of this modification”.

Solution development and discussion points

Consumer advice

During the Development Stage the Proposer noted that consumer representative websites were advising consumers who wished to refuse the installation of a Smart Meter, or to replace their existing Smart Meter, to contact their Suppliers to have legacy meters installed. While this is technically possible it is not a sustainable solution; as manufacture of these Devices becomes scarcer the price will increase and this will be borne by the consumer. The websites also advised consumers they can have Smart Meters installed with the Smart functionality ‘turned off’, which there is no way of doing within the Install and Commissioning procedures in the SEC.

SECAS liaised with Citizens Advice and the Energy Ombudsman to discuss the drafting on their websites to ensure that the information provided reflects possible options more accurately. Citizens Advice have altered the wording on their website throughout the rollout to reflect that consumers have the choice not to have a Smart Meter.

In January 2024, SECAS proposed new wording for the Energy Ombudsman website. The proposed wording removes terms suggesting smart functionality can be ‘turned off’. SECAS will continue to work with Energy Ombudsman on this wording and will update this report accordingly.

All reasonable steps

Citizens Advice considered that a Supplier would have met its obligation to take ‘all reasonable steps’ to install a Smart Meter if the customer had refused to have a Smart Meter installed. However, as customers cannot be left without a functioning meter, there are limited options available should a Smart Meter installation be refused.

The TABASC Chair highlighted that including the ability in the SEC to not have communications may conflict with some of the Supply Licence Conditions and a view from Ofgem should be sought.

Ofgem advised they would not approve any solution which could undermine ‘all reasonable steps’ to install a Smart Meter in a communicative state.

The Operations Group (OPSG) Chair suggested that the SEC is about Smart Metering. Enabling Suppliers to ‘turn off’ a Smart Meter may be extending the scope of the SEC beyond the original intentions. The Proposed Solution looks only at how communication with Devices may be selectively reduced for consumers who would otherwise refuse Smart Meter installation.

SECAS and the Proposer have developed a Proposed Solution which constitutes an additional step to be taken once ‘all reasonable steps’ have been exhausted.

Removal of Communications Hubs

During the Development Stage the Proposer noted that some Suppliers are attempting to comply with consumer wishes to have Smart Meters installed in a non-communicative state by not commissioning the Communications Hub or by physically removing the Communications Hub.

The TABASC noted concerns about removing Communications Hubs at a premise where a fully functioning Smart Metering System is already installed, suggesting meters may become 'distressed' if they lost connection to the Communications Hub.

The DCC and its Service Providers highlighted that any solution that involved removing the Communications Hub would prevent any firmware upgrades to Communications Hubs, meters and any other Devices on the Home Area Network (HAN) which would be an area of concern for security. It also confirmed that their systems were set up to identify and report non-communicating meters, but not to identify if this was intentional.

SECAS and the Proposer have developed a Proposed Solution which aligns with the SEC processes for installing and commissioning Communications Hubs, and which does not require their removal. The Proposed Solution will also introduce the ability to discern between Devices which are non-communicating due to a fault or due to consumer choice.

CSP notification of 'Restricted' flags

During the Working Group and TABASC meetings, members queried the need for Business Requirement 5. The requirement reads; "The DSP will notify the CSP when a DCC System Flag has been applied". The TABASC Chair noted that the proposed DSP 'Restricted' flag would reject Service Requests and as such they would never reach the CSP in the first place. The TABASC and Proposer agreed that this requirement was not necessary. SECAS engaged with DCC who noted that this requirement constituted a large part of the costs in the Preliminary Assessment. As such, SECAS requested a second Preliminary Assessment with this requirement removed. The second Preliminary Assessment returned costs of between £351,000 and £750,000 for implementation of this modification, compared to the first Preliminary Assessment which returned costs of between £1,291,600 and £1,690,600.

Consumer perception of 'Restricted Mode'

During the April 2023 Working Group meeting members noted that consumers may not understand what the 'Restricted' mode on their Smart Meter was, and that communicating this to consumers could be challenging. Members noted this, but also highlighted that the issue of consumers refusing Smart Metering installs is a problem which needs to be addressed. Another member believed that this modification would help to solve the widespread mistaken belief that a 'dumb mode' exists in Smart Metering. They noted that this will also help improve guidance given by the Energy Ombudsman in its recommendations to Suppliers when resolving escalated customer complaints.

SSI or Service Request?

During the Preliminary Assessment SECAS assumed that the mechanism for notification that a Device was in Restricted Mode would be provided by the SSI. During the Working Group several members who are Large Suppliers queried whether a Service Request should be added which Suppliers can use as part of the install and commission process. This would prevent Devices from

sending or receiving unwanted messages whilst the installing Party wait for the 'Restricted' update to take effect. The Proposer has acknowledged these comments and added that Parties are unable to enable Machine to Machine interface of the SSI, meaning the changes would need to be done manually. However, the Proposer also notes that using a Service Request to set the Restricted status this would mean additional cost to the modification.

Two respondents to the Refinement Consultation supported the principle of using a Service Request rather than via the SSI. They believed that a Service Request would be more useful as this would allow automation of setting the Restricted flag, rather than the manual intervention required via the SSI. They also noted it would lead to improved reporting of Restricted Devices.

Those Parties who supported using the SSI noted that it would be cheaper than having a new Service Request. These Parties also caveated their responses, noting that without knowing precisely how many consumers would choose to have their Device in Restricted mode, they could not say whether using the SSI or Service Request would be preferential.

Will a 'Restricted' flag be automatically cleared?

Working Group members queried whether the DSP 'Restricted' flag would automatically be cleared when there was a notification of a CoT or CoS. One member noted that Suppliers can currently send Service Requests to restrict access to information on CoT, suggesting that this functionality could be used in this modification to automatically reset the flag so it was not 'Restricted'. SECAS is not issuing guidance as part of this modification about whether the flag should automatically be reset upon a CoT or CoS.

Modification legal text

As this modification is a change to DCC User Interface Specification (DUIS), SECAS has not drafted any legal text. Should the Impact Assessment be requested, the DCC will provide a list of the changes to the SEC as part of the Impact Assessment.

Potential loss of benefits from having Smart Meter installed

During the November 2023 Working Group meeting, members debated the impact of having a Smart Meter in 'Restricted Mode' and whether all benefits from having the Device installed would be lost.

DCC confirmed that the In-Home Display (IHD) and Pre-Payment Meter Interface Device (PPMID) would be commissioned when the Smart Meter is installed before the Restricted flag was applied. As such, the consumer could still receive benefit of having the Smart Meters installed, even if their Consumption Data was not being shared with the Supplier.

Members also noted that the Proposed Solution will allow Devices to easily be switched to and from Restricted mode if a Consumer changes their view. However, some members questioned how frequently Consumers would change their view, or move property, meaning the Smart Metering System would remain in Restricted Mode.

When can the Restricted Mode be applied to the Device?

Working Group members debated whether the Restricted Mode can be applied to Devices that are newly installed, as well as Devices already installed. The DCC's technical solution for this modification will allow the Restricted Mode to be set at any point.

Will there be any guidance provided as part of the modification about how to communicate with consumers?

At the February 2024 Working Group meeting, Parties questioned whether SECAS would issue guidance about the new Restricted Mode which could then be passed onto consumers. SECAS will not issue any guidance as part of this modification, as it is the responsibility of each Party to manage their communications with their customers and it not something which can be enforced as part of this modification.

Does the consumer have a right to refuse a Smart Meter?

Throughout the modification process Parties have questioned whether it is explicitly noted that the consumer has a right to refuse a Smart Meter.

The Proposer notes that the customers right to refuse a Smart Meter is not written, however was expressed verbally by a Minister in Parliament. The Proposer notes that the Minister was asked about mandating Smart Meters and replied that Energy Consumers would always have the ability to choose whether to have a Smart Meter.

The Proposer has also discussed the right to refuse with the Consumer Reference Group, who have noted that the Supplier is responsible for the arrangements when the Consumer refuses a Smart Meter, inferring that the Consumer has a right to refuse.

8. Case for change

Business case

In favour of approval

Parties in favour of approval noted that this modification would meet the wishes of Consumers who wish to have a Smart Meter operating in Restricted mode, as well as allowing Suppliers to complete their obligations under all reasonable steps. They added that as the smart functionality can be restored if the Consumer changes their view which is useful for the wider Smart Meter rollout. Parties in support also noted that introduction of Restricted mode could lead to an uptake in Smart Meter installs as some Consumer concerns would have been alleviated. In turn, this could lead to a reduction in the pressure on traditional meter stock.

Against approval

Parties noted that fully operational Smart Meters are a key enabler for meeting Government net zero targets, providing benefits to Consumers and the wider energy system. They believed that Devices

which can assist in supporting net zero ambitions should not be restricted. In addition, the cost of installing a Device may be undermined if the Consumer is able to eliminate the value which the Device provides, taking away the business case for having a Smart Meter installed.

One Large Supplier noted that this modification could only be applied to SMETS2 credit Devices. They believed this is unacceptable as they would not be able to offer the same service to pre-payment customers as they would with credit customers.

A number of Parties questioned the costs surrounding this modification, noting that this modification would mean SEC Parties paying costs to lose the business benefits they receive when installing a Smart Meter. Rather than approving the modification, one Party commented that it would be useful to educate Consumers on the benefits of Smart Meter, rather than implement this modification.

Many Parties asserted that although this modification may resolve concerns of Consumers on data privacy grounds, it does not resolve the issue of Consumer refusals on the grounds of RF noise. As the meter is still somewhat communicative, Consumers may also refuse on data privacy grounds if they are unable to determine the distinction of a Device operating in Restricted mode.

One Party also noted that the implementation date of 2025 is a long way away and the Smart Meter rollout should be close to completion by then. They questioned why a modification would be implemented towards the proposed end of the rollout when the majority of Devices had been installed successfully.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification better facilitates SEC Objectives (a)¹ and (g)².

SEC Objective (a)

This modification will facilitate the installation of more Smart-capable Devices. Other than the inability to retrieve Consumption Data, responsible Parties will be capable of communicating with the Devices via the DCC System and carrying out essential business processes, such as firmware maintenance, which are necessary for the continued interoperability of Devices.

SEC Objective (g)

This modification will better enable Suppliers to adhere to their licence conditions without contravening Install and Commissioning obligations defined in the SEC.

Industry views

During the Refinement Consultation Parties provided differing views on how this modification in relation to SEC objective (a). Supportive Parties noted that this modification would answer some of the concerns Consumers had about Smart Meters and therefore would lead to an increase in the

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² Facilitate the efficient and transparent administration and implementation of this Code.

installs. Unsupportive Parties believed this modification would not lead to the efficient interoperability of Smart Meters as it would negate the value of smart metering.

Views against the consumer areas

Improved safety and reliability

This modification will have a positive impact against this consumer area. It will allow Suppliers an additional option for installing Smart-capable Devices at consumer premises where this would previously have been prevented due to the consumer's data privacy concerns. These Devices offer greater safety and reliability than heritage meters, for which there is dwindling stock of replacement parts and decreasing specialist knowledge within the industry.

Lower bills than would otherwise be the case

This modification will offer an alternative for consumers who may otherwise have to pay for the expensive installation and maintenance of a non-Smart heritage meter.

Reduced environmental damage

This modification will have a positive impact against this consumer area as it will result in fewer Devices being unnecessarily replaced or scrapped when an incoming tenant wishes to have their Smart Meter removed. It will also prevent the need for continued manufacture of heritage meters.

Improved quality of service

This modification will have a positive impact against this consumer area as it will allow consumers to realise the benefits of Smart Metering without the need to compromise on their concerns over data privacy.

Benefits for society as a whole

This modification will have a positive impact against this consumer area as it will help to increase the Smart capability of the energy network with all the attendant benefits, other than the increase in sharing of consumption data. It will allow consumers to exercise their rights to refusal of Smart Meter installations while reducing the onus on Suppliers to contravene best practice under the SEC.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	14 Jun 2021

Timetable	
Event/Action	Date
Presented to CSC for initial comment	29 Jun 2021
CSC converts Draft Proposal to Modification Proposal	28 Sep 2021
Business requirements developed with Proposer and DCC	Oct 2021
Modification discussed at Working Group	3 Nov 2021
Modification discussed at Working Group	1 Dec 2021
Business requirements discussed at TABASC	Jan 2022
Business requirements developed with the Proposer	May – Jul 2022
Business requirements discussed with Device Manufacturers	2 Aug 2022
Business requirements discussed at TABASC	4 Aug 2022
Business requirements discussed at SSC	14 Sep 2022
Modification discussed at Working Group	5 Oct 2022
Business requirements discussed with the DCC	14 Nov 2022
Preliminary Assessment requested	28 Nov 2022
Update provided to CSC	20 Dec 2022
Preliminary Assessment returned	10 Feb 2023
Modification discussed at Working Group	5 Apr 2023
Modification discussed at TABASC	6 Apr 2023
Modification discussed at OPSG	11 Apr 2023
Refinement Consultation	7 Jun 2023 – 28 Jun 2023
Second Preliminary Assessment	11 Sep 2023 – 1 Oct 2023
Modification discussed at Working Group	1 Nov 2023
Modification discussed at Working Group	7 Feb 2024
Impact Assessment Request at Change Board	21 Feb 2024
Impact Assessment Requested	22 Feb 2024
Impact Assessment Returned	24 Apr 2024
Impact Assessment discussed with Working Group	5 Jun 2024
<i>CSC approves Modification Report</i>	<i>18 Jun 2024</i>
<i>Modification Report Consultation</i>	<i>19 Jun 2024 – 10 Jul 2024</i>
<i>Change Board Vote</i>	<i>24 Jul 2024</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
CCSG	Cross-Code Steering Group
CoS	Change of Supplier
CoT	Change of Tenancy
CSC	Change Sub-Committee
CSP	Communication Service Provider
DCC	Data Communications Company
DNO	Distribution Network Operator
DSP	Data Service Provider
DUIS	DCC User Interface Specification
GPF	Gas Proxy Function
HAN	Home Area Network
IHD	In Home Display
OPSG	Operations Group
PIT	Pre-Integration Testing
PPMID	Pre-Payment Meter Interface Device
REC	Retail Energy Code
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specifications
SMI	Smart Metering Inventory
SMIP	Smart Metering Implementation Programme
SMKI	Smart Metering Key Infrastructure
SRV	Service Reference Variant
SSI	Self-Service Interface
SSMI	Self-Service Management Interface
TABASC	Technical Architecture and Business Architecture Sub-Committee
UIT	User Integration Testing
WAN	Wide Area Network