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MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'

Conclusions Report – version 1.0

About this document

This document summarises the responses received to the Modification Report Consultation and the decision of the Change Board.

Summary of conclusions

Change Board

The Change Board voted to approve MP271. It believed it better facilitated Smart Energy Code (SEC) Objectives (a)¹, (c)² and (d)³.

Modification Report Consultation

SECAS received nine responses to the Modification Report Consultation. One respondent, an Other SEC Party (OSP), believed the modification should be rejected. Eight respondents, one Large Supplier and seven OSPs, believed the modification should be approved. Supportive Parties considered the modification better facilitates SEC Objectives (a), (c) and (d).

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 Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.

³ facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

Modification Report Consultation responses

Summary of responses

The one OSP recommending rejection believed that there is already adequate representation for OSPs who are Data Communications Company (DCC) Users. They noted the Terms of Reference of the Change Board mean that elected representatives must act on behalf of the entire constituency. As such, they noted that MP271 does not change the existing arrangements as the Proposed Solution requires elected Other Users (OU), Meter Data Retrievers (MDR) and Registered Supplier Agents (RSA) to act on behalf of all OSPs. They also believed there was little evidence of OU, MDR and RSA having been nominated for Sub-Committee seats and not been elected. They referenced the number of Change Board and TABASC elections which have taken place when nominations have exceeded the number of seats.

Supportive Parties believed that MP271 would better facilitate SEC Objective (a) by ensuring the specific skills and experience of OU, MDR and RSA at Sub-Committees. They noted this could lead to better experiences for consumers through debating issues and solutions, better facilitating SEC Objective (c). They also believed that this would lead to engagement from the OSP category who are DCC Users which in turn would facilitate competition between organisations. They believed this would better facilitate SEC Objective (d).

One supportive Party, who is an OSP, noted that they had incurred costs from having to deal with a non-responding Devices. They believed that if OU, MDR and RSA had increased representation this could lead to issues being identified earlier, therefore preventing unnecessary costs.

Change Board vote

Change Board vote

The Change Board voted to recommend MP271 be **approved** by the Authority.

The vote breakdown is summarised below.

Change Board vote				
Party Category	Approve	Reject	Abstain	Outcome
Large Suppliers	3	1	2	Approve
Small Suppliers	0	0	1	Abstain
Network Parties	2	0	0	Approve
Other SEC Parties	0	2	0	Reject
Consumer Representative	0	0	1	Abstain
Overall outcome:				APPROVE

SEC Section D8.15 (f) states that abstentions shall be treated as if no vote were cast. As such, the modification was approved by two Party categories to one.

The Small Supplier and Consumer Representative abstained as they felt they should not vote in matters relating to the Other SEC Party category.

Large Supplier and Network Party representatives voted to approve the modification as they believed the modification would increase representation for these groups and allow their expertise to be present at Sub-Committee meetings.

OSP representatives voted to reject the modification as they did not believe that seats should be re-allocated to specific types of organisations within the OSP constituency. They also considered that they did not believe the views provided in the Modification Report Consultation were the view of the entire OSP category.

Views relating to the General SEC Objectives

Objectives (a), (c) and (d)

Those Parties at Change Board which approved MP271 noted that they believed the modification would lead to better representation of the views of Other Users, Meter Data Retrievers and Registered Supplier Agents. They noted that the modification provided these groups with more opportunity to be involved in discussions and also commented that the seat could be given by any SEC Party should no OU, MDR or RSA apply. They noted the modification would better facilitate SEC Objectives (a), (c) and (d) for the reasons given in the Modification Report.

Change Board discussions

A Small Supplier representative (CB) queried the final number of Modification Report Consultation responses. They noted that in the documentation they possessed, it appeared that only there were only five respondents. SECAS (BG) advised that they had received four late responses to the consultation, noting there had been nine total responses. The Authority (CU) questioned whether there was a reason for four Parties submitting their consultation responses. SECAS (BG) replied that there was no specific reason provided by the respondents. They added that there were several issues to clarify with the respondents regarding their submissions that had only been resolved shortly before the meeting, which explained why the documentation was not circulated to members. SECAS (AB) noted that Parties are reminded that if they submit responses to consultations late the Proposer may not have time to consider them.

A Change Board member representing Network Parties (RP) commented on the benefits highlighted by the Proposer. They noted they did not understand how the modification could prevent costs in future. SECAS (BG) advised that the Proposer believes that if there are no OU, MDR or RSA present at Sub-Committee meetings, this could lead to solutions being developed or issues being discussed without the input of these groups. In turn, the Proposer believes that this could lead to costs for Parties as issues may not be identified. They also noted one response to the Modification Report Consultation from an OSP who has advised their organisation had experienced costs due to a lack of testing with OU. A Large Supplier member (EL) questioned how increased representation for OU, MDR and RSA at TABASC and Change Board would prevent costs. SECAS (BG) commented that it would provide these groups an opportunity to give input and highlight potential issues and costs.

A OSP representative (NW) asked for clarification about the Proposed Solution in respect of the number of seats at TABASC and Change Board for OSPs. SECAS (BG) confirmed the Proposed Solution was to re-allocate one of the three existing OSP seats at the Change Board to an elected OU, MDR or RSA. The changes to the TABASC would involve adding a new seat for OU, MDR and RSA, which would increase the number of OSP representatives from two to three. (NW) questioned what would occur if no OU, MDR or RSA applied to fill the seat. SECAS (BG) noted that a clause had

been added to the Legal Text to allow any Party from the OSP constituency to apply if no OU, MDR or RSA apply to the seat.

A member (EJ) stated they would like to delay the Change Board vote to allow members further time to consider the late responses to the Modification Report Consultation. They questioned whether a delay of a month would impact the targeted release. SECAS (BG) noted that this is an Authority-Determined modification so the timescale for decision was uncertain. However, they commented that SECAS is targeting the modification for inclusion in the June 2025 SEC Release and they believed a decision would be returned before the cutoff date for inclusion.

An OSP representative (IL) noted the Change Board Terms of Reference which state that members must represent their entire constituency. They noted there are 165 Other SEC Parties of which eight responded to the Modification Report Consultation. They noted they believed this did not give a representative view of perspectives from the entire OSP category. The Chair (AB) noted that SECAS has an open action to increase engagement with the OSP Category. SECAS (BG) also noted that since being raised, this modification was discussed at the OSP Engagement Call each month. They also noted that SECAS had been sending targeted emails to OSPs encouraging them to respond.