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MP271

‘Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents’

Modification Report

Version 0.2

28 August 2024



About this document

This document is a draft Modification Report. It currently sets out the background, issue, solution, impacts, 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 James Murphy of Stark.

As of August 2024, there 159 Smart Energy Code (SEC) Parties in the Other SEC Party (OSP) category, making it the largest SEC Party category. Within this category there are many different types of organisations, such as Meter Asset Providers (MAPs), Other Users and academic organisations. The Proposer has noted that due to the size and nature of the OSP category and the conflicting issues and concerns of Parties within it, it is very difficult for OSP representatives to properly act on behalf of the constituency.

The impact of the current arrangements is that OSPs, specifically those who are Data Communications Company (DCC) Users, may not receive appropriate representation on SEC Sub-Committees. The Proposer believes that this may lead to technical solutions not receiving the correct input and consequently increased costs for Parties.

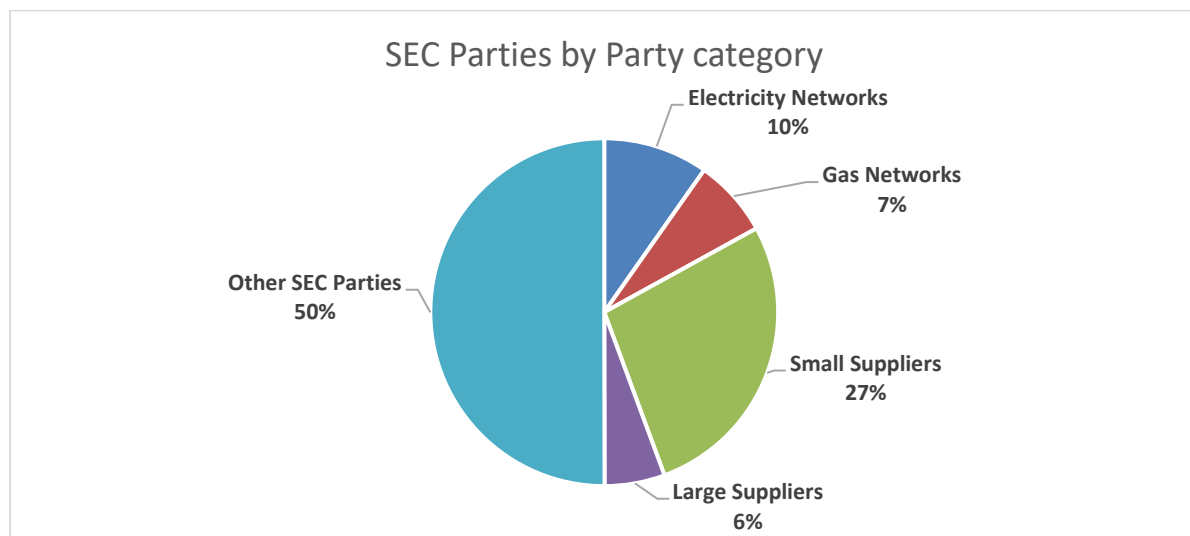
The Proposed Solution is to re-allocate one existing OSP seat at the Operations Group (OPSG), Technical Architecture and Business Architecture Sub-Committee (TABASC), Change Sub-Committee (CSC) and Change Board to an elected Party who acts in the role of Other User, Meter Data Retriever (MDR) or Registered Supplier Agent (RSA).

Smart Energy Code Administrator and Secretariat (SECAS) is targeting this modification for inclusion in the February 2025 SEC Release and will proceed as an Authority-Determined modification.

2. Issue

What are the current arrangements?

As of August 2024, there are 318 SEC Parties which are grouped into five different Party categories. When a Party accedes to the SEC they are categorised as either an Electricity Network, Gas Network, Small Supplier, Large Supplier or OSP. The current percentage breakdown of SEC Parties by party category is listed below:



The OSP category is the largest of the five constituencies, representing 159 Parties and 50% of the total of all SEC Parties. Unlike the other constituencies which represent one type of organisation, the OSP category encapsulates many different types of organisations such as Meter Manufacturers, MAPs, Consumer Data Services, Other Users and academic organisations amongst others.

To represent the OSP constituency, Parties elect representatives at various SEC Sub-Committees. The current OSP representatives at the OPSG, TABASC, CSC and Change Board are listed in the table below, along with the type of organisation they work on behalf of.

Other SEC Party representatives at SEC Sub-Committees			
Sub-Committee	Representative	Organisation	Type of organisation
OPSG	Alex Ford	Chameleon Technology (UK) Limited	Manufacturer
	Geoff Huckerby	CGI IT UK Limited	Other User
	Michael Snowden	Secure Meters (UK) Limited	Manufacturer
TABASC	Ian Lovatt	Chameleon Technology (UK) Limited	Manufacturer
	Matthew Hallchurch	Elster Metering Limited	Manufacturer
CSC	Philip Doyle	Reverve Limited	Energy Management Software Provider
	Jeff Studholme	Smart Meter Assets 1 Limited	Meter Asset Provider
Change Board	Nick Winfield	Landis & Gyr Limited	Manufacturer
	Ian Lovatt	Chameleon Technology (UK) Limited	Manufacturer
	Patrick Caiger-Smith	Green Energy Options Limited	Manufacturer

What is the issue?

The Proposer believes that due to the scale and nature of the Other SEC Party category, it is not possible for OSP representatives at SEC sub-committees to adequately represent the entire category. This is because the high number of Parties in the category, but also because of the different types of organisations within the OSP category. Due to the differing nature of these organisations, they have conflicting priorities, issues and concerns which makes it difficult for OSP representatives to act on behalf of all OSPs.

In particular, the Proposer notes there is a clear delineation between OSPs who are DCC Users (Other Users, MDRs and RSAs) and those who are not. At the OPSG, TABASC, CSC and Change Board there are ten Other SEC Party representatives, of which only one is a DCC User.

What is the impact this is having?

The Proposer believes that a lack of representation for Other Users, MDRs and RSAs could mean that their views are not fully represented at forums. In turn, this could lead to increased costs for Parties due to a lack of insight and engagement from the Other SEC Parties who are DCC Users.

Impact on consumers

There is no direct impact on consumers arising from this modification.

3. Solution

Changes to the make-up of the TABASC and Change Board would require legal text changes to the SEC. Changes to the CSC and OPSG will take place via the Terms of Reference, with the current members of these Sub-Committees needing to provide a consensus on whether to accept the proposed changes. If this is agreed, SECAS will present the proposed Terms of Reference changes to the SEC Panel for final approval.

Proposed Solution

The Proposed Solution is to re-allocate one existing OSP seat at the OPSG, TABASC, CSC and Change Board to an elected OSP who acts in the role of Other User, MDR or RSA.

This would not change the existing voting make-up of the Change Board, as the newly elected Other User, MDR or RSA would still sit under the OSP voting group.

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
✓	DCC Other Users	✓	MAPs/ MAMs
✓	Meter Data Retrievers	✓	Registered Supplier Agents

If the Proposed Solution is implemented, then OSPs will be impacted as their representatives will change.

DCC Systems

DCC System changes

There are no impacts on the DCC System or System traffic because of this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section D 'Modification Process'
- Section F 'Smart Metering System Requirements'

5. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **26 June 2025** (June 2025 SEC Release) if a decision to approve is received on or before 12 June 2025; or
- **27 November 2025** (November 2025 SEC Release) if a decision to approve is received after 13 June 2025 but on or before 13 November 2025.

As this modification requires text-only changes to the SEC it can be implemented in the next possible SEC Release following the Authority's decision. With the current modification timeline, the next possible release this modification could be included in is the June 2025 SEC Release.

6. Assessment of the proposal

Areas for assessment

Timing of elections

Due to the different election periods for each Sub-Committee within the scope of this modification, SECAS will discuss whether Parties would prefer to hold new elections when this modification is implemented or wait until the end of existing terms before holding new elections.

Sub-Committee input

The scope of this modification includes changes to the Change Board, CSC, OPSG and TABASC. The CSC and OPSG changes will take place via the Terms of Reference, meaning a consensus is needed from members before the proposed changes are presented to SEC Panel for final approval.

Changes to the Change Board and TABASC require legal text changes, meaning members will be asked to provide their opinions on the changes to feed into the Modification Report.

Sub-Committee input	
Sub-Committee	Input sought
Change Board	What are your thoughts on the changes in the Proposed Solution?
CSC	Do you agree to the changes in the Proposed Solution?
OPSG	Do you agree to the changes in the Proposed Solution?
TABASC	What are your thoughts on the changes in the Proposed Solution?

Observations on the issue

Change Sub-Committee

SECAS presented this modification to the Change Sub-Committee in August 2024. Noting the Proposer's comment that specific representation for Other Users, Meter Data Retrievers and Registered Supplier Agents could reduce costs in future, one CSC member questioned where these savings would come from as OSPs do not pay DCC charges. SECAS notes that the Proposer believes that by having representation, OSPs who are DCC Users will be able to fully input into solutions, ensuring they are fully developed and no unforeseen issues will be encountered in future which could cause costs.

Solution development/ Discussion points

Decision not to Pursue an Alternative Solution

Before this modification was formally raised, the Proposer devised two potential solutions for discussion with the Issues Group. The first solution was the current Proposed Solution to re-allocate existing OSP seats at OPSG, TABASC, CSC and Change Board. The Alternative Solution was to create a new Party category and add an additional new seat at OPSG, TABASC, CSC and Change Board for the elected Party in this role.

SECAS presented both Solutions to the June 2024 meeting of the Issues Group, where Large Supplier members commented that the creation of a new Party category would lead to changes in the voting make-up of the Change Board. They added that this would lead to Other SEC Parties, who pay no DCC charges, having more voting power than Large Suppliers who pay the majority of DCC charges. Issues Group members also considered the impact of [DP218 'Review of the SEC Charging Methodology'](#) in the re-allocation or creation of new seats.

Following comments from the Issues Group, the Proposer removed the Alternative Solution from the scope of this modification.

Previous modifications relating to seating changes

One previous modification has been raised relating to seating changes and Other Users. [MP084 'Other User Panel Seating Amendment'](#) sought to split the two OSP seats at SEC Panel so that one of the representatives was an Other User, with the other seat being occupied by any Party in the OSP category. This modification was rejected by the Change Board and the Authority in early 2020. Both

the Change Board and Authority considered the modification did not have a suitable business case or better facilitate the SEC objectives.

When do reviews on the composition of Sub-Committees take place?

Reviews of the composition of SEC Sub-Committees take place on a case-by-case basis. The last full review of the Sub-Committee's took place in 2022 which accounted for percentage of market share, DCC usage and share of costs. SECAS expects to complete another review of the Sub-Committees if [DP218 'Review of the SEC Charging Methodology'](#) progresses through the modification process.

Is a modification required to change the balance of Sub-Committees?

Some Sub-Committees have their composition written into the SEC, whereas others have their composition written into their Terms of Reference. For the proposed changes in this modification, changes are needed to SEC Section D 'Modification Process' relating to the Change Sub-Committee, with changes to SEC Section F 'Smart Metering System Requirements' for the TABASC.

The proposed changes to the Change Sub-Committee and OPSG can take place via the Terms of Reference for these Sub-Committees. SECAS will present the modification to these groups and existing members will provide a consensus on the Proposed Solution before SEC Panel makes the final decision.

Are there are examples of a lack of representation for OSPs who are DCC Users?

The Proposer believes that specific representation would have been useful for Other Users, Meter Data Retrievers and Registered Supplier Agents when the Change Board voted on [MP162 'SEC changes required to deliver MHHS'](#). The Proposer notes that at the Change Board vote, OSP representatives voted to reject the modification (one voted to approve, one voted to reject and one abstained). The Proposer notes that this vote was understandable as the modification did not impact the majority of the Other SEC Party constituency, however for OSPs who are DCC User's or intend to be, the outcome of the vote was very important. The Proposer believes that specific representation for Other Users, Meter Data Retrievers and Registered Supplier Agents in this instance could have led to a different vote.

If changes are made to Sub-Committee composition, will the newly re-allocated seats be filled?

Several Parties have questioned the impact of an Other SEC Party seat being re-allocated but then not being filled. Several Parties at the SECAS Other SEC Party engagement call noted that if the seat remains unfilled then this would reduce the representation for Other SEC Parties.

SECAS will investigate wording a clause in the legal text to ensure that if no Parties acting in the role of Other User, Meter Data Retriever or Registered Supplier Agent apply for the re-allocated seat, any Party from the Other SEC Party category will be able to apply.

Can Parties who are acting in more than one User Role apply?

At the June Issues Group, one member questioned whether a Party who acts in the role of Import Supplier and Other User would be able to apply to represent Other Users, Meter Data Retrievers and

Registered Supplier Agents. SECAS has confirmed that any party acting in the role of Other User, Meter Data Retriever or Registered Supplier Agent can apply to represent the group.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Draft Proposal raised	13 Aug 2024
Presented to CSC for initial comment	20 Aug 2024
CSC converts Draft Proposal to Modification Proposal	20 Aug 2024
Modification discussed with Working Group	4 Sep 2024
Modification discussed with OPSG	10 Sep 2024
Modification discussed with CSC	17 Sep 2024
Modification discussed with SEC Panel	24 Sep 2024
Modification discussed with Change Board	25 Sep 2024
Modification discussed with TABASC	3 Oct 2024
<i>Refinement Consultation</i>	<i>16 Oct 2024 – 06 Nov 2024</i>
<i>Modification discussed with Working Group</i>	<i>4 Dec 2024</i>
<i>Modification Report approved by CSC</i>	<i>17 Dec 2024</i>
<i>Modification Report Consultation</i>	<i>18 Dec 24 – 15 Jan 2025</i>
<i>Change Board Vote</i>	<i>22 Jan 2025</i>
<i>Estimated Authority Decision</i>	<i>17 March 2025</i>
<i>Targeted Implementation</i>	<i>26 June 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
CSC	Change Sub-Committee
DCC	Data Communications Company
MAP	Meter Asset Provider
MDR	Meter Data Retriever
OPSG	Operations Group
OSP	Other SEC Party
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat

Glossary	
Acronym	Full term
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee