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Paper Reference:	OPSG_165_0906_MP321
Action:	For Discussion
<i>Acronyms and Defined Terms SEC Glossary</i>	

MP321 'Managing SEC Party Organisation Changes'

1. Purpose

The purpose of this document is to gain feedback from Operations Group (OPSG) members in relation to the proposed solution as part of MP321 'Managing SEC Party Organisation Changes'.

2. Summary of MP321

This section summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix A.

2.1 What is the issue?

If a Smart Energy Code (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.

2.2 What is the impact?

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 could 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.

2.3 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 This could be as a result of outdated firmware on Devices, leaving Parties unable to rectify issues for their consumers.

2.4 2.4 Proposed 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.

3. Questions for the OPSG

We seek the OPSG's input on the following questions to feed into the modification before we look to attend meetings with the TABASC and SMKI PMA to gather industry feedback:

- Does the proposed solution suitably address the issue?
- Are there any impacts to industry that have not yet been identified within the Modification Report?

4. Next steps

The SEC Change team will present this modification to the TABASC & SMKI PMA prior to carrying out a Refinement Consultation to gather further industry feedback.

5. Recommendations

The OPSG is requested to:

- **NOTE** the contents of this paper;
- **PROVIDE** feedback on the Proposed Solution

Simon Grimwood

SEC Change Team

1 June 2026

Attachments:

Appendix A: MP321 Modification Report v0.1