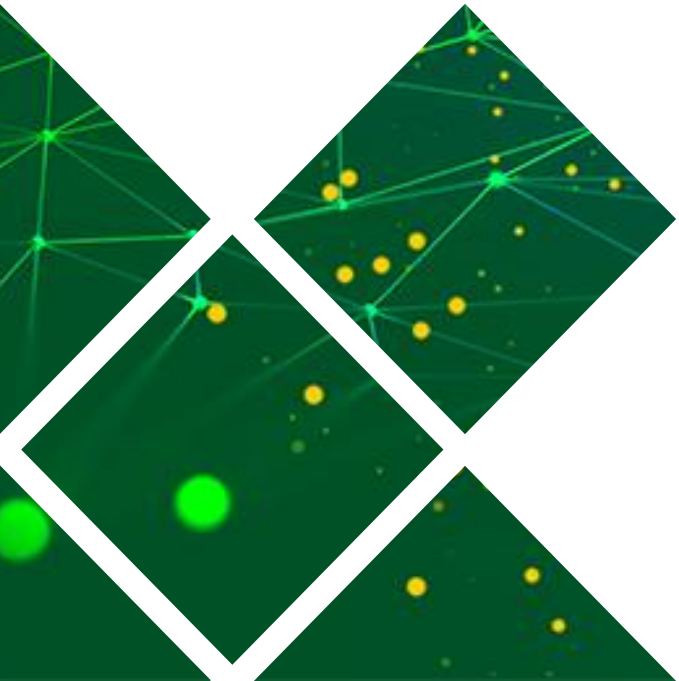


SEC Change Monthly Working Group Meeting

August 2025



Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



Housekeeping

- Please raise your hand
- Please be clear, explain acronyms
- This session will be recorded for minuting purposes, please be courteous!
- Just a reminder that we should be able to have free discussions of ideas



Meeting Notice

Participants are reminded that the use of AI technologies by Members (Alternates) or Observers – including call recording or meeting transcription tools – is not permitted during any SEC governance meetings.

Additionally, please ensure you always adhere to the Panel Information Policy.



■ Introductions

- When I say your name, please:
 - Say hello so we can check your audio is working



■ MP289 'BCDR Engagement'

Georgie Severin

Raised by David Rollason from DCC

MEDIUM

Objectives of the Working Group

REVIEW	The Proposed Solution
AGREE	The legal text
AGREE	The next steps

Issues & Impacts

- The DCC's approach to Business Continuity and Disaster Recovery (BCDR) testing has evolved and the current SEC Party engagement/notification requirements may not be appropriate in every instance of BCDR testing.
- Different engagement requirements across outage activities and advanced planning make it difficult to engage parties in an efficient and joined up manner.
- SEC Parties currently have no formal visibility over how the DCC approaches BCDR testing.
- Lack of formal visibility on DCCs BCDR testing approach gives parties little insight into the purpose and benefits of testing.

■ MP289: Overview (2/2)

Proposed Solution

- Amend the current requirements for engagement and notification to ensure that parties are notified ahead of BCDR testing that is expected to impact the provision of DCC services. The DCC is not suggesting a change to the 60 Working Day's notice.
- Formalise the production and availability of the DCC's BCDR Testing Approach document. This will include requirements for the DCC to publish it on the DCC website, keep the document under review and up to date as well as requirements on the information contained within it, as a minimum.

■ MP289: Draft Legal Text (1/2)

- H10.12A Before notifying the Parties of each Business Continuity and Disaster Recovery Test that is expected to impact the provision of DCC Services, the DCC shall consult with the Parties and the Panel regarding the Business Continuity and Disaster Recovery Test Schedule to ensure that (insofar as is reasonably practicable) the Business Continuity and Disaster Recovery Test is undertaken in such a way as to minimise any disruption to the provision of the Services (or any part of them). The DCC shall complete all necessary consultation prior to notifying Parties.
- H10.12B The DCC shall notify each Party of its intention to carry out a Business Continuity and Disaster Recovery Test that is expected to impact the provision of DCC Services and provide each Party with a Business Continuity and Disaster Recovery Test Schedule at least 60 Working Days before the date on which such test is due to start. Where the DCC needs to amend the Business Continuity and Disaster Recovery Test Schedule following such notification and it is not reasonably practicable to give 60 Working Days' notice, it will provide such notice as far in advance as is reasonably practicable.

■ MP289: Draft Legal Text (2/2)

H10.12C For information purposes the DCC shall publish on the DCC website its Business Continuity and Disaster Recovery Test Approach Document and will keep the document under review and update it as may be required from time to time. The document should, as a minimum include:

- (a) The overall Business Continuity and Disaster Recovery Test approach including planning, execution, post-test reviews and the testing of new services prior to go live;
- (b) Future considerations for opportunities to reduce the impact to Service disruption; and
- (c) The approach to engagement with Parties and notifying them of Business Continuity and Disaster Recovery Tests.

■ MP289: BCDR Testing Approach Doc.

- The DCC has provided an updated version of the [draft BCDR Testing Approach Document \(v0.5\)](#)
- The aim of the approach document is to provide Parties with additional insight into the DCC's approach to proving resilience and conducting BCDR Tests.



■ MP289: Next Steps



■ MP289: Working Group Questions

Do you have any comments on the draft legal text or the content of the DCC's Draft BCDR Testing Approach Document?

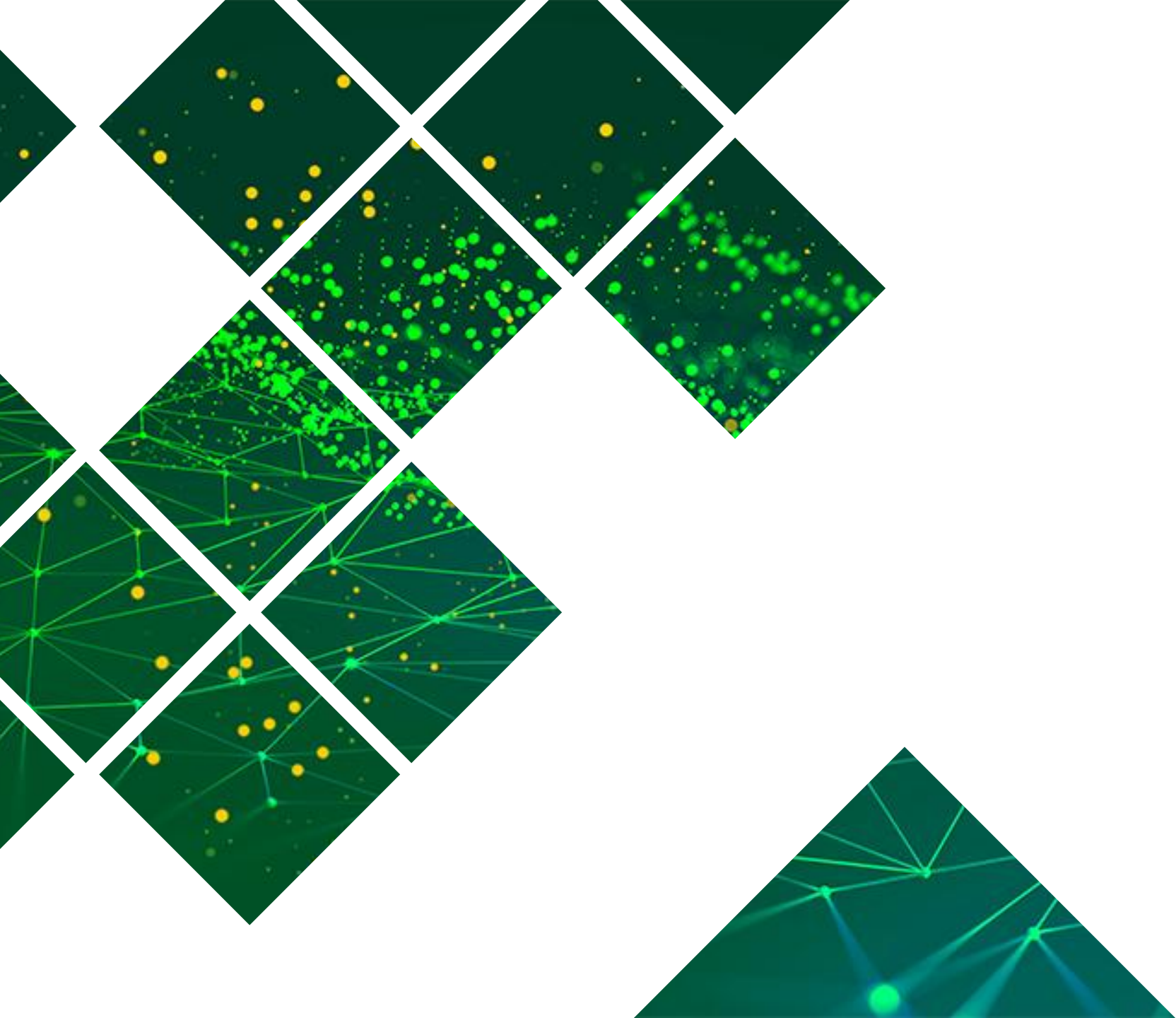
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Do you agree the next steps?

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Any other comments/questions?

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Thank you for
listening!

Any questions?

■ MP265 'Implementing ADT changes in response to a Security Incident'

Georgie Severin

Raised by Gordon Hextall on behalf of the Security Sub-Committee (SSC)

MEDIUM

Objectives

REVIEW

The Preliminary Assessment

AGREE

The next steps

Issue

- In the event of a system compromise, the DCC cannot overwrite User-set ADTs to aid in the recovery process.

Solution

- The Proposed Solution would look to allow the DCC, in exceptional circumstance, and only under the recommendation of the SSC, to amend User-set ADTs to help with the recovery process.

■ Business Requirements (1/2)

Ref	Requirement
1	For instances where DCC services have been suspended for impacted Service User(s) following a Security incident, the Security Sub-Committee (SSC) – on behalf of affected DCC Users – shall authorise the DCC to make changes in User-set Anomaly Detection Thresholds (ADT) levels to prevent quarantining of critical messages for a specified period.
2	For instances where DCC services have been suspended for impacted Service User(s) following a Security incident, the DCC – under authorisation of the SSC – shall make changes in User-set ADT levels without recourse to individual Comma-Separated Values files, subject to Security controls, e.g. two-Party involvement.

■ Business Requirements (2/2)

Ref	Requirement
3	For instances where DCC services have been suspended following a Security incident, the DCC –under authorisation of the SSC – shall turn off the ADT functionality for impacted Service User(s) for a limited period to be specified by the SSC.
4	For instances where DCC services have resumed following a Security incident suspension, the DCC – under authorisation of the SSC – shall return to the previous User-set ADT settings for impacted Service User(s) at a time specified by the SSC

■ Preliminary Assessment Summary

Cost (Design, Build & PIT)

- £160,000 - £240,000

Implementation

- Expected to take **3 months** up to the end of PIT
- Based on the existing requirements, the total fixed price cost for a Full Impact Assessment is **£29,117** and would be expected to be completed in **40 Working Days**.

Considerations

- This Modification is currently targeting a November 2026 SEC Release.
- The Modification cannot be implemented on DSP2 alone, while the existing DSP platform is in use. If implementing on DSP2 only, this must be done after Migration is complete.

■ Impacts (1/3) – DSP Impacts

Design Authority

- Impacts Microservice Component Specification Documents

Application Development

- Impacts low level design and code to turn off and reactivate ADT thresholds for specified Service User(s)

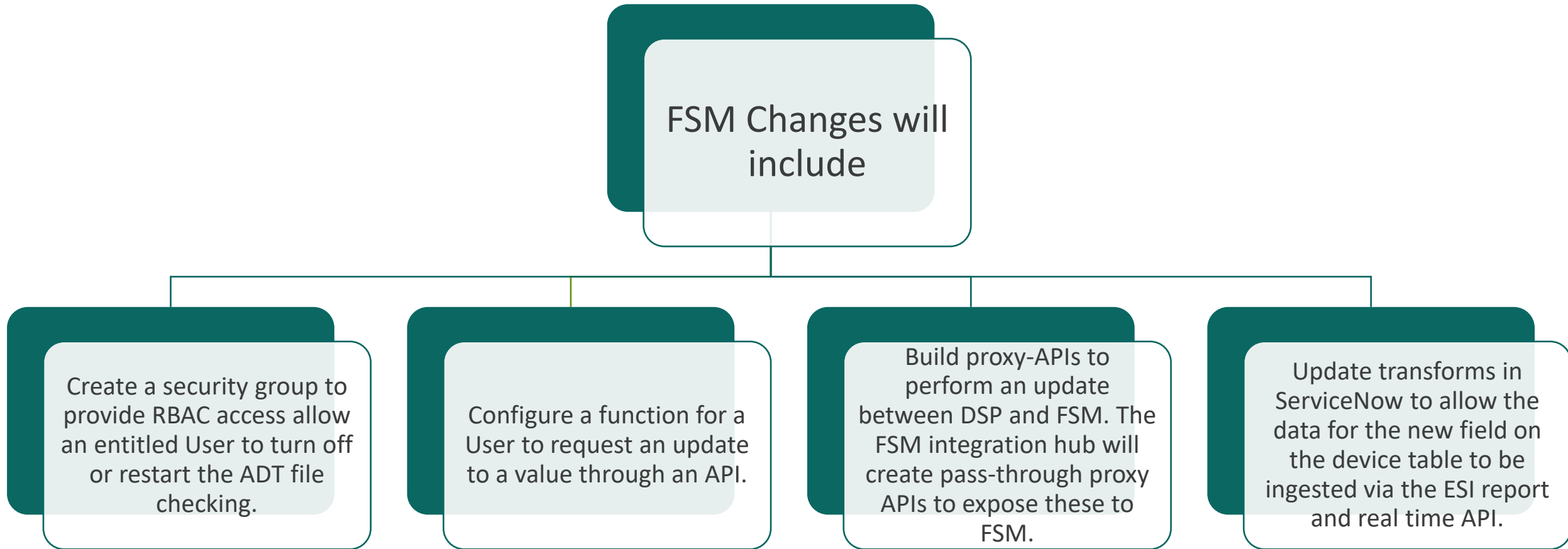
DSP Microservices

- Impacts to Microservice Designs; the impacted microservices have not currently been designed

Other Solution Impacts

- Upon restarting the ADT Checking, the ADT values will be returned to their previous values.
- Expected to be restarted as soon as possible, but DSP solution will include backstop position by setting a maximum time period for which ADTs can be turned off. Configuration to be set by DCC (and the SSC).

Impacts (2/3) – FSM Impacts



■ Impacts (3/3) – Other Impacts

Security Impact

- Should be limited to security assurance throughout the implementation phase.
- Assurance includes reviewing designs, test artefacts and consultancy to the implementation and test teams.

Infrastructure Impact

- No change to infrastructure design
- Additional processing and storage required
- Not sufficiently large to warrant procurement of additional compute power or storage

DCC Impacts

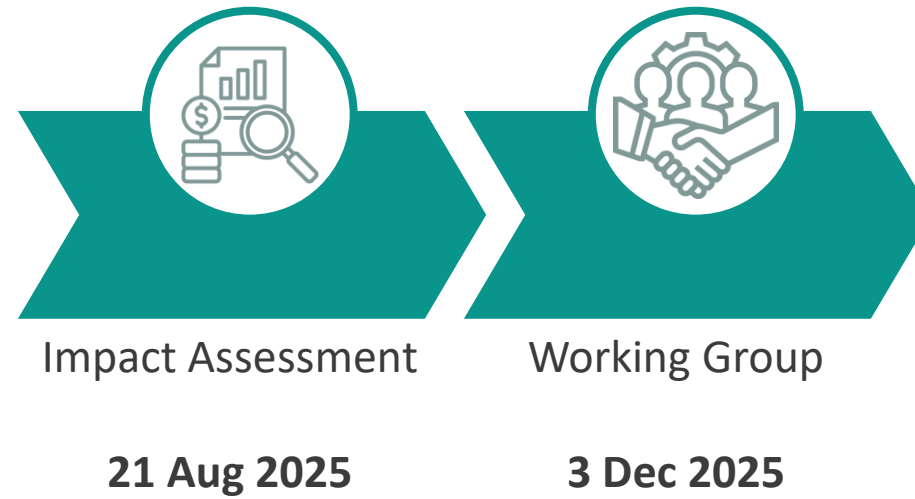
- DCC Service Desk and Service Management team to update existing and potentially create new processes to handle directions from the SSC in relation to ADT changes.

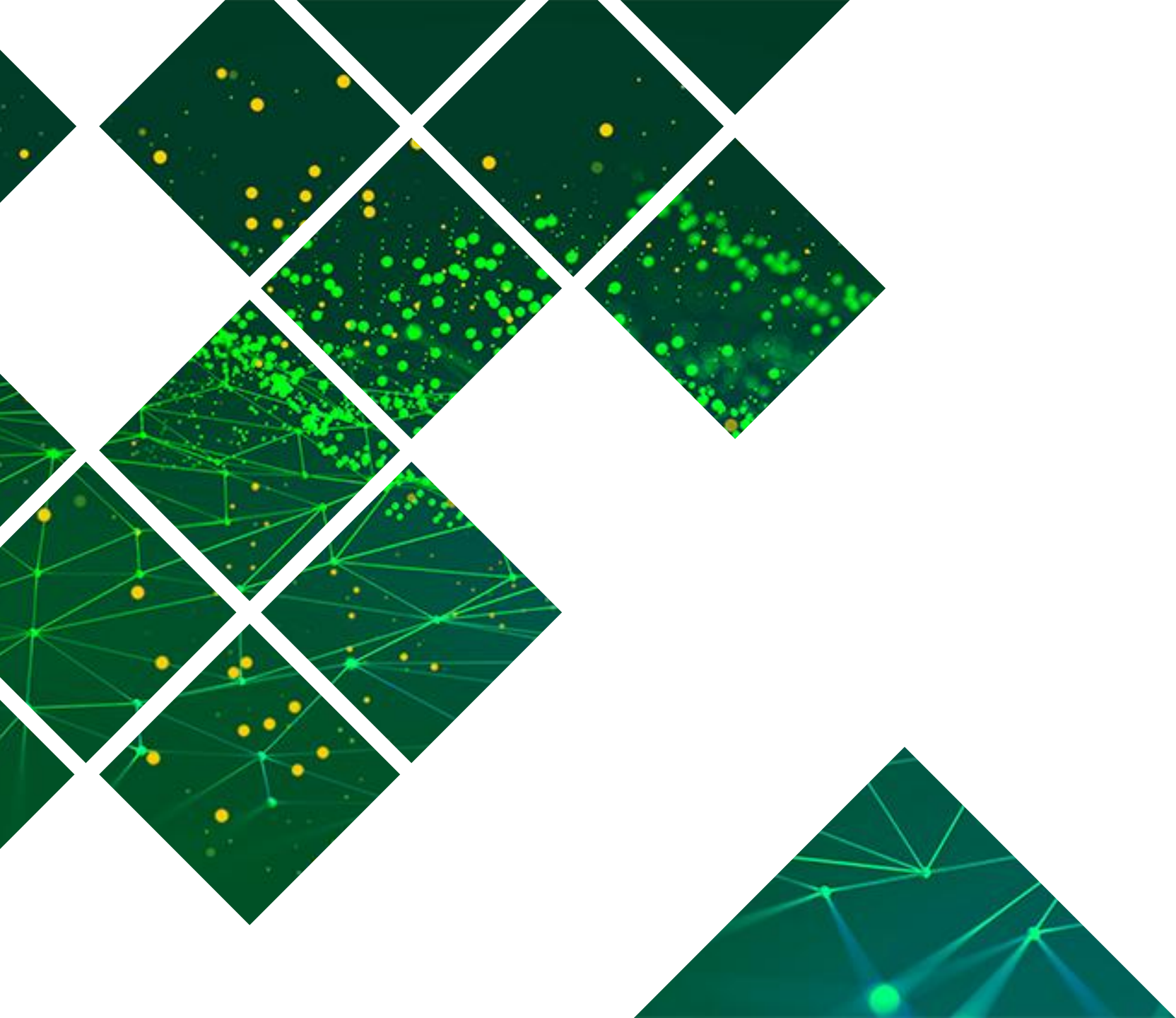
■ Questions for the Working Group

Is there anything else that should be considered as part of the solution?



■ Next Steps





Thank you for
listening

Any questions?

■ MP169 'Managing the Consumer's refusal of a Smart Meter'

Alison Beard

Raised by Emslie Law of Ovo

Authority Determined

Objectives of the Working Group

REVIEW	The second Impact Assessment against existing DSP
REVIEW	The Preliminary Assessment against DSP2
REVIEW	SEC Agreed Procedure
AGREE	Next steps

DSP Impacting Solution

- Introduction of 'Restricted Attribute' to the Data held for each Device in the SMI.
- Applicable to SMETS2 Devices in Credit Mode.
- Reset on a Change of Tenancy, but not a Change of Supplier.
- Requests relating to Consumption Data are not allowed. Only requests which pertain to Critical, Security and Safety and Firmware are permitted.

Full Impact Assessment - Existing DSP

Impact Assessment against existing DSP

- Costs to implement technical solution (Design, Build, PIT, SIT, UIT, Implementation) of £966,675
- Built against Existing DSP, Future Services Management, and DCC Reporting.
- Effectively same requirements and solution as PIA on Existing DSP
- Implementation timescale one year
- Earliest possible implementation in Nov 2026
- Estimate of SEC Release costs £400,000

■ Preliminary Assessment - Future DSP

Preliminary Assessment against DSP2

- Costs to end of Pre-Integration Testing of £180,000 - £250,000.
- Built against Future DSP (DSP2), Netcompany, and Future Services Management, and DCC Reporting.
- Effectively same requirements and solution as FIA on Existing DSP.
- Costs to complete Impact Assessment of £50,791
- Estimated lead time of four months for Design, Build, and PIT.
- Possible implementation to be determined in FIA. If not going into Existing DSP, then cannot be during Existing DSP-> Future DSP migration.

■ SEC Agreed Procedure

Smart Meter is installed and commissioned – the Supplier should set the Scheduled Read Window to a zero-value meaning the Device will not send readings at the required scheduled date.

This will allow Critical, Safety and Security and Firmware updates.

This will only be visible to the responsible Supplier – other Parties will be unaware the Consumer has requested the Device in 'dumb mode'.

■ Feedback 1/2

- Supplier System costs
- Doesn't address where consumer doesn't want a Smart meter
- If only Supplier aware – how is compliance monitored
- What about Other Users access
- Some SRVs apply to PPM only (2.2, 4.3, 4.13, 4.14 and 4.18)
- 3.4 is part of install and commission

Feedback 2/2

- OU will gain consent from consumer before they communicate with a meter so can act independently of Supplier.
- MDR will only communicate with a meter for legal purposes. E.g. no consent needed to read HH data for settlement purposes, so also can act independently of Supplier.
- Other SEC Parties will not be impacted (remove from impacts table) and amend the reference below to ‘Suppliers’

SEC Parties that are able to send SRVs to the SMS should note in their systems that the consumer does not wish to have their meter interrogated (that the consumer would like the SMS to operate in ‘restricted mode’) and set their system, so it does not (in so far as possible) request the following SRVs:

Definition	SR	Eligible User Roles
Top Up Device	2.2	IS
		GS

Questions

Do you have any comments regarding the costs in the IA (DSP1) and PA (DSP2)?

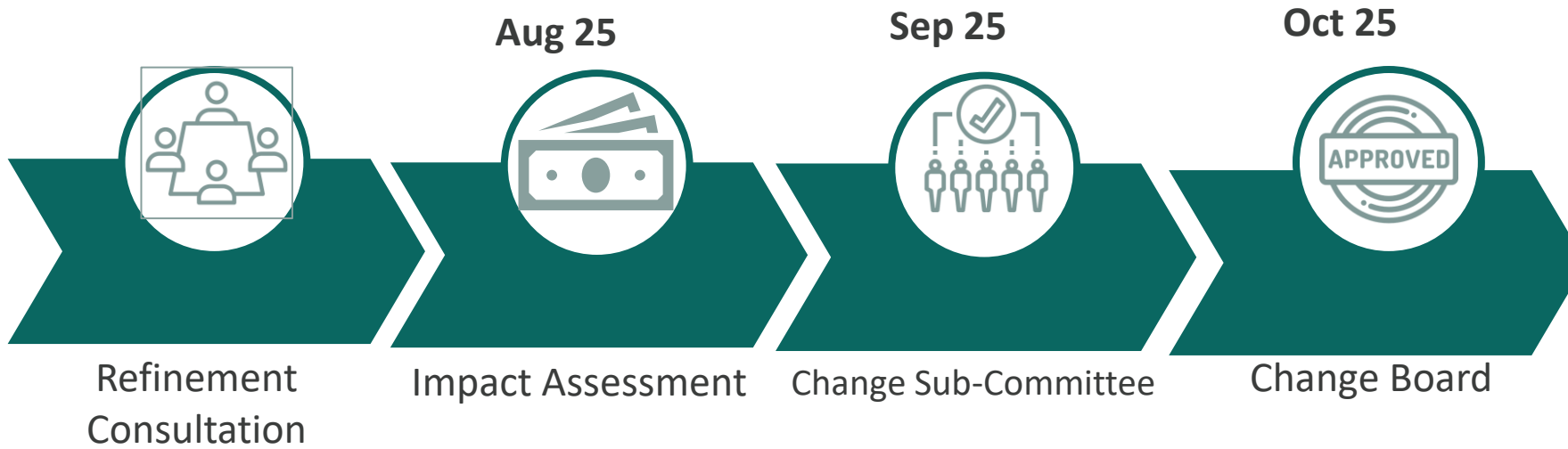
Should the IA be requested?

Do you believe there is an adequate business case for implementing MP169?

Do you have comments regarding the SEC Agreed Procedure?

Any further comments?

Next Steps



Aug 25

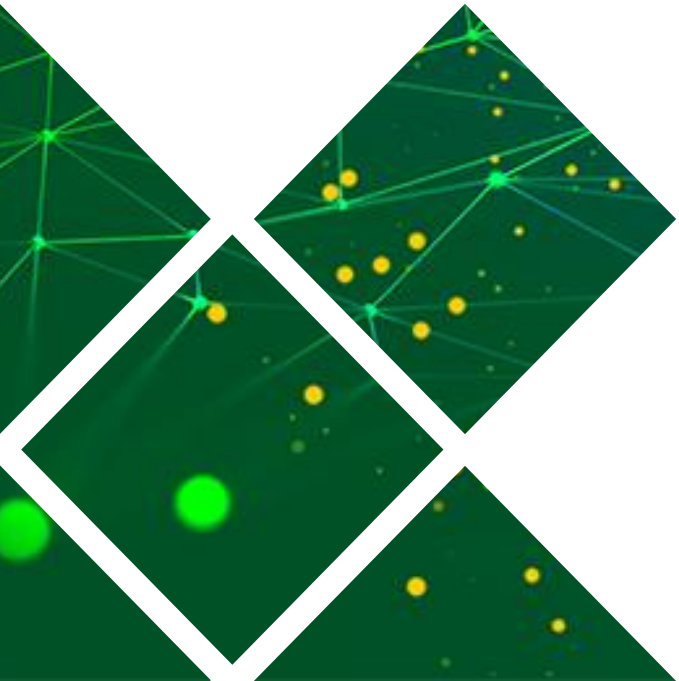
Sep 25

Dec 25

Jan 26

SEC Issues Group

August 2025



■ Issues Group – Review of ownership of Additional Registration Data (Gas)

Lydia Bentley

Raised by Tracey Saunders (Northern Gas Networks)

Objectives of the Issues Group

REVIEW	The issue
AGREE	The next steps

Background

- SEC Section E 'Registration Data' prescribes how Registration Data is provided to the DCC.
- Data is provided via either the CSS (as required under the REC), or directly from SEC Parties (as **Additional** Registration Data).
- SEC Section E5 governs arrangements for the provision of Additional Registration Data

Issue

- Gas Network Parties have an obligation under SEC E5.3 and E5.4 to provide Additional Registration Data to the DCC on a monthly basis.
- These two clauses may be the only obligations on Gas Network Parties in the entire Smart Energy Code.

Impact

- Gas Network Parties therefore accede to the SEC to fulfil a single obligation
- SEC membership creates a regulatory burden for Gas Network Parties which, the proposer argues, is disproportionate to their obligations under the Code.

■ Proposed Solution

Solution

- The proposer has suggested that Gas Network Party obligations to provide Additional Registration Data to the DCC may be moved from the SEC to the REC.
- This would allow Gas Network Parties to secede from the SEC entirely.

Considerations

- What are the secondary considerations surrounding provision of Additional Registration Data?
 - For example, do the REC and SEC manage data security and data management in different ways?
- How will the DCC be affected by a move in obligation ownership?

■ Proposed Progression Pathway

Can the
obligation
leave the SEC?

Can the REC
accept the
obligation?

How can the
obligation be
seamlessly
transitioned?

■ Questions for the Issues Group

Anything else that needs to be considered?



■ Next Steps



Change Sub-Committee

16 September 25



Working Group

01 October 25

■ Issues Group – Further customer journeys to extend performance metrics under MP242

Lydia Bentley

Raised by Rochelle Harrison (Centrica)

Objectives of the Issues Group

REVIEW	The issue
AGREE	The next steps

Overview (1/2)

Background

- MP242 introduced a new reporting model for seven business processes.
 - Service Request Variants (SRVs) in these business processes are assessed against a binary/pass fail metric as opposed to a response time.

Issue

- Four processes were not included in MP242 as they were not deemed to be in scope at the time.
 - Change of Tenancy, Estate Management, I&C Amendment (incl. TCSO), Security Management

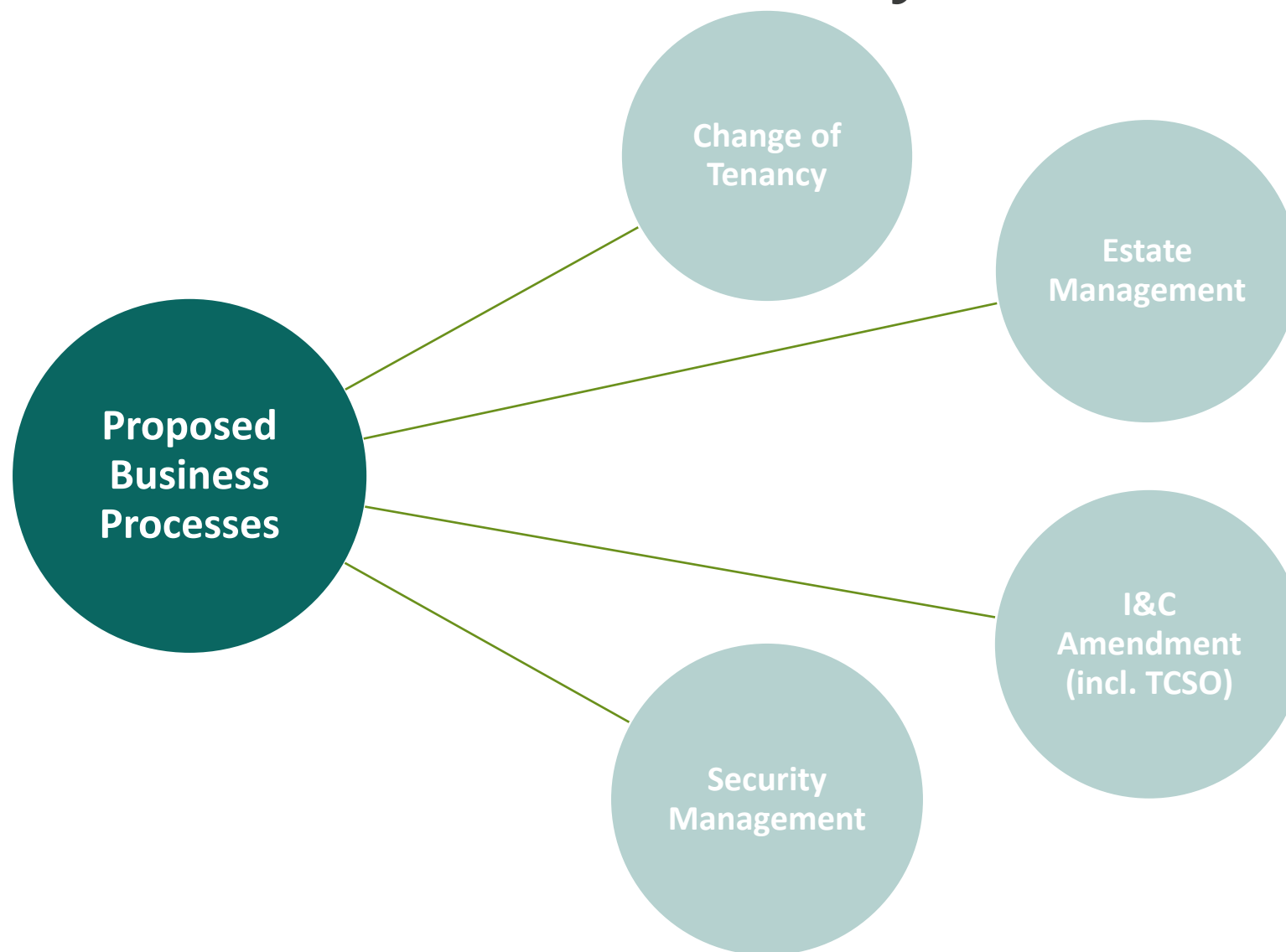
Impacts

- Suppliers and DCC
- By not having the proposed business processes within the MP242 reporting framework, current available data to support issue resolution for Suppliers is less granular.
- Benefits may include improved consumer outcomes & reduced Supplier resource & system requirements.

Differences w/ Previous Discussion

- This issue was previously raised at the April Issues group.
- SECAS and the Proposer were considering novel progression routes such as:
 - Explicit Charges
 - A novel service for reporting comparable to the Elective Comms Service
- Following exploration of these routes, the Proposer has requested that we return to a standard progression route.

■ Proposed Solution Summary



■ Proposed Progression Pathway

Determine
required
SEC changes

Determine
Relevant
SRVs

Establish
Delivery
Costs

■ Questions for the Issues Group

Anything else that needs to be considered?



■ Next Steps



Change Sub-
Committee

16 September 25



Working Group

01 October 25

YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

June Episode: In this episode, we had our usual roundup of the past month in SEC Change, before delving into the details of the three new Draft Proposals raised this month. We also provide our listeners a reminder of the SEC obligation relating to MP253 'Traffic Management for Price Cap Update Event – User Actions Required' which will become active on 7th of August 2025.

July Episode: In this episode, we roundup the past month in SEC Change before providing an overview of MP253 'Traffic Management for Price Cap Update Event – User Actions Required' as the SEC obligation comes into effect on 7th August 2025. We also provide an update on the DCC assessment and the referral of MP241 'Interoperability Checker Update'.

**Want know more about SEC Change and Modifications?
Why not listen to our Modcasts!**

Available to listen on our [website](#) or [LinkedIn](#)

Thank you for attending

The next meeting will be on
Wednesday 3 September 2025

