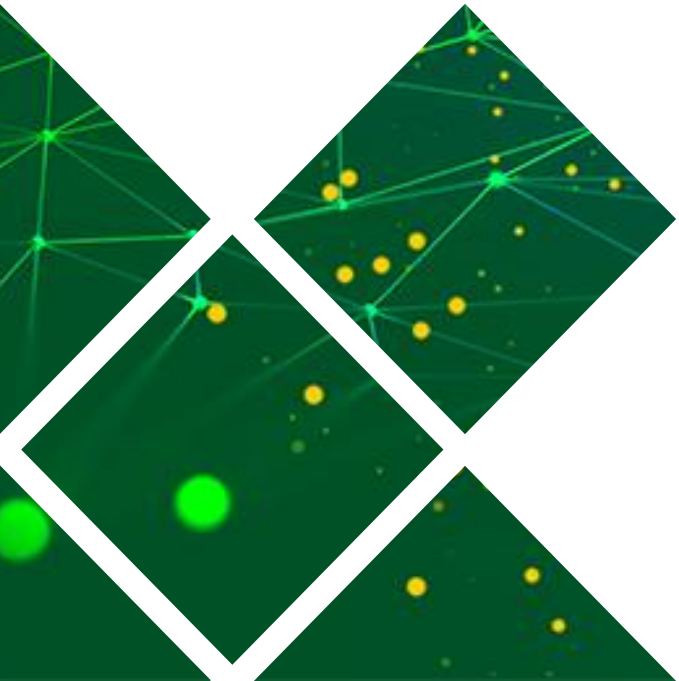


SEC Change Monthly Working Group Meeting

May 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



Introductions

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



■ MP234 'Addition of Public Task and Legitimate Interests into the SEC'

Ben Giblin

Raised by Matt Roderick of N3rgy

Authority Determined

LOW

■ Objectives of the Working Group

NOTE	Issue and impact
REVIEW	Public Task and assurance approach
REVIEW	Legitimate Interests and assurance approach
IDENTIFY	Initial views of the Working Group

Context

This modification was raised in February 2023 and has been on hold for two years.

The Proposer also raised MP219 'Accessing Consumption Data on behalf of SEC Parties' and MP235 'Enhanced Meter Data access for Other Users'.

SECAS and the Proposer agreed that MP234 should be placed on hold, pending the outcome of MP219.

As MP219 was approved at Change Board in March 2025, MP234 is now being progressed.

The assurance approach has been agreed by the PSC, but there are several other issues which need to be finalised (Legal Text, PCF) before the Refinement Consultation will open.

Overview (1/2)

Issue

- To collect Consumption Data, a Party must have the Unambiguous Consent or Appropriate Permission for each Energy Consumer.
- Local Authorities or Registered Social Landlords have regulatory obligations to tackle fuel poverty, identify vulnerable households and maintain minimum standards of housing.
- These bodies would like to use Public Task and Legitimate Interests to collect Consumption Data however cannot do so as they are not included in the SEC.

Impact

- These bodies may not be able to collect the Consumption Data and therefore may be unable to fulfil their obligations.

Proposed Solution

- Introduce Public Task and Legitimate Interests into Section I 'Data Privacy'.
- This would allow Consumption Data to be collected without having the Appropriate Permission for that Consumer or gaining their Unambiguous Consent.
- Anyone who sought to use Public Task and Legitimate Interests would need to accede to the SEC.

■ Public Task - Definition

- ***“Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.”***
 - Carrying out a specific task in the public interest which is laid down by law; or
 - Exercising official authority (for example, a public body’s tasks, functions, duties or powers) which is laid down by law.
 - **The processing must be necessary. If you could reasonably perform your tasks or exercise your powers in a less intrusive way, this lawful basis does not apply.**

■ Public Task - Assurance

SECAS has discussed MP234 with the PSC who agreed that before Public Task can be used, SECAS and the IPA should verify that it is being used appropriately.

SECAS will produce an acceptable use list, meaning that once usage has been verified, Parties will be able to rely on this without SECAS verification.

Public Task – Process

The Party using Public Task submits documentation, specifying the relevant task, function or power and its statutory or common law basis.



SECAS/IPA check that the relevant item is as described.



SECAS/IPA deem whether the processing is necessary - if unclear the submitting organisation would be required to provide a legal opinion confirming PT is applicable.



If unnecessary, processing cannot go ahead on that basis and another basis may be identified.

■ Legitimate Interests

- *“Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interest or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.”*

■ Legitimate Interests – Assurance

The PSC noted that Legitimate Interests must be assessed differently to Public Task as LI is often open to abuse.

The PSC agreed that an existing Information Commissioners Office template for assessing LI should be used, however amendments should be made to cover Section I requirements.

Guidance will also be produced for Other Users to ensure they meet the required standards when submitting LIAs.

■ Legitimate Interest – Process

The Party using Public Task submits LIA.



SECAS/IPA check that the LIA has been completed adequately.



SECAS/IPA form a view on whether LI has been established



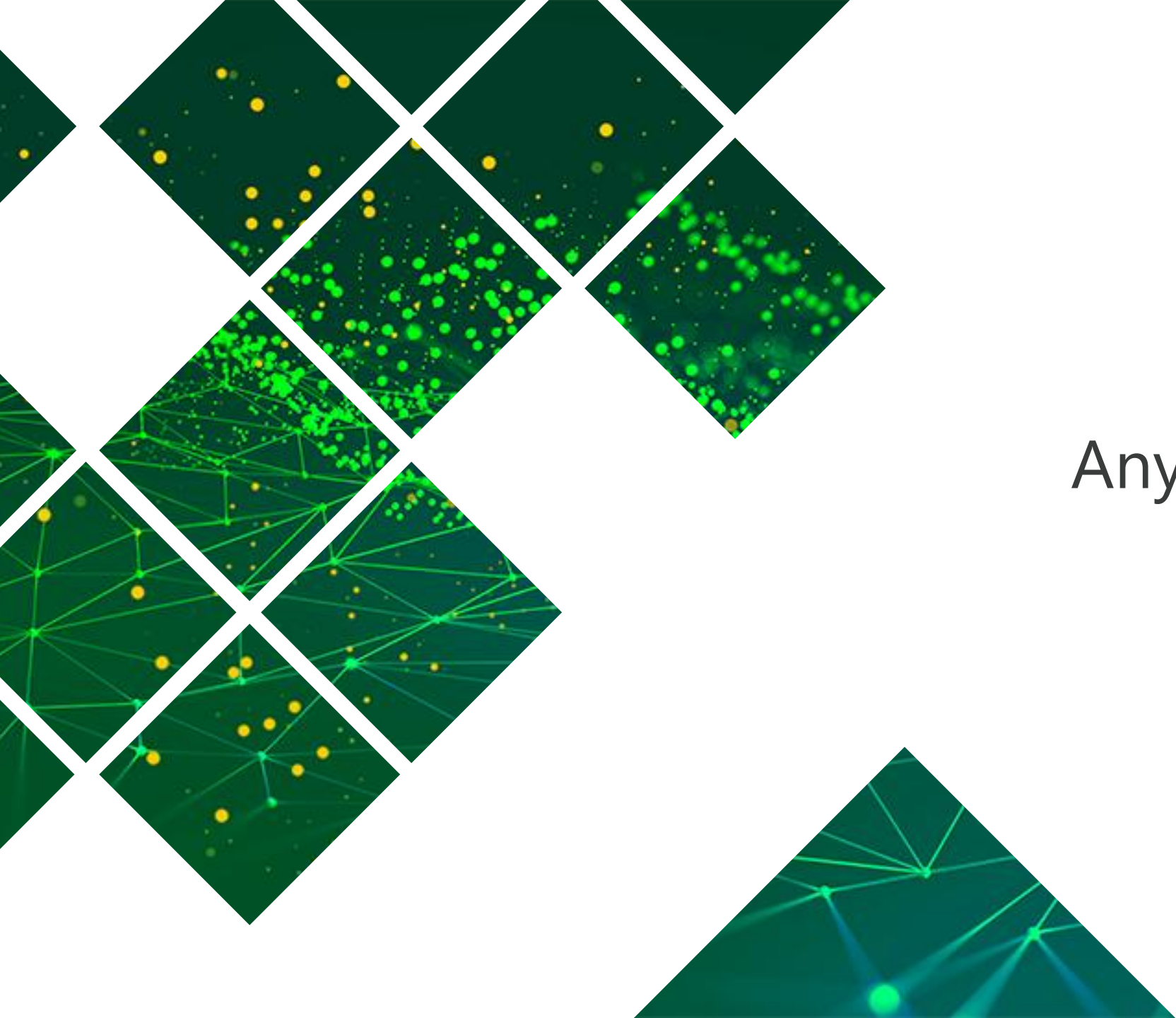
If unnecessary, processing cannot go ahead on that basis and another basis may be identified

■ Questions for the Working Group

Do you have any comments regarding Public Task?

Do you have any comments regarding Legitimate Interests?

Anything else that needs to be considered?



Thank you for listening

Any further comments?

■ MP281 'Install Codes in the SMI'

Marc Rhodes

Raised by Emslie Law from OVO

MEDIUM

Objectives of the Working Group

REVIEW	The Business Requirements
AGREE	The Potential Solution
AGREE	The next steps

■ MP281: Overview (1/3)

Issue

- Where non-commissioned Devices are changing Supplier, it is often the case that the gaining Supplier cannot complete the commissioning activity as they do not have the install codes to do so. This requires the gaining Supplier to establish the identity of the installing Supplier, and then to request the install codes.
- Wide Area Network (WAN) issues were expected to be resolved over time however that has not been the case.
- The email solution implemented as part of [MP121 'Commissioning non-commissioned Devices after CoS'](#) is not suitable to deal with the volume of non-commissioned installs that are being encountered.

Background

- [MP121 'Commissioning non-commissioned Devices after CoS'](#) which was implemented as part of the February 2022 SEC Release considered options to provide install codes to gaining Suppliers.
- An automated solution making install codes available via the Self-Service Interface (SSI)
 - costed in the Preliminary Impact Assessment (PIA) at £150,000 – £350,000.
- Data Communications Company (DCC) maintained spreadsheet at a proposed
 - cost of £25,000.
- The chosen solution was an email-based option obligating a losing Supplier to provide the required install codes to the gaining Supplier within a 10-day Service Level Agreement (SLA) or to provide confirmation that they were not the installing Supplier.

Solution Development

- Putting the Install code into the Smart Metering Inventory (SMI) would allow the install codes to be obtained without the need to manually identify and contact the installing Supplier.
- It is recognised any change to the SMI is a Data Service Provider (DSP) change so likely to have significant costs, this issue has been identified as a problem under the Smart Meters Not Operated In Smart Mode (SMNOSM) work and is supported by the Department for Energy Security & Net Zero (DESNZ).

■ Business Requirements

Ref	Requirement
1	Install codes for Devices to be uploaded by Suppliers to the Smart Metering Inventory (SMI)
2	Install codes to be made available to Suppliers via the Service Management Portal
3	Installing Supplier shall provide the install codes via Service Reference Variant (SRV) 12.2 'Device Pre-notification' during pre-notification
4	Installing Supplier shall provide the Device Certificates & Access Control Broker (ACB) Certificates used by the Device via 12.2 'Device Pre-notification' during pre-notification

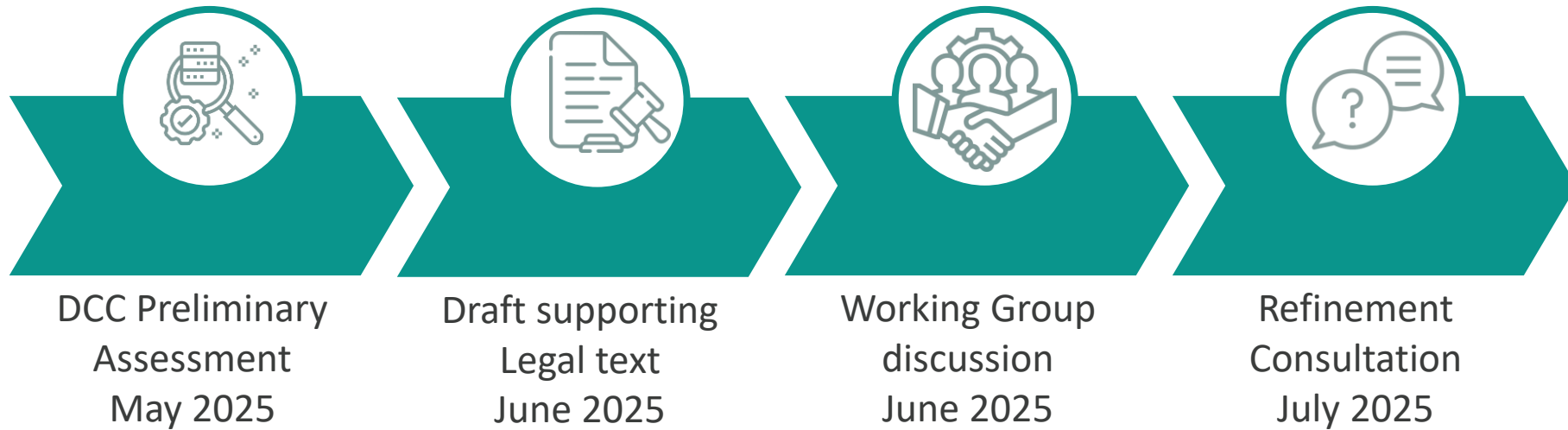
Questions for the Working Group

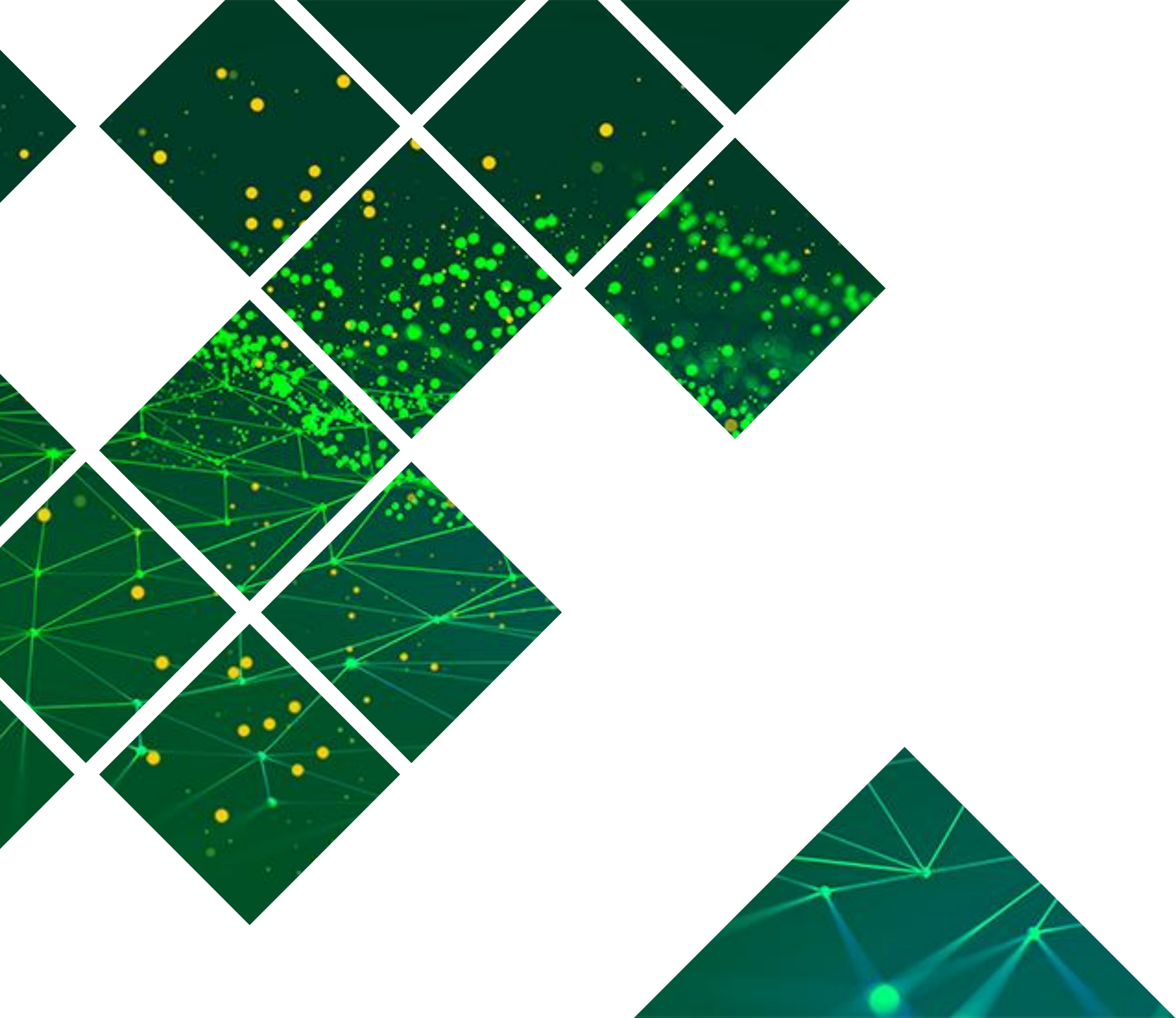
Are the proposed requirements suitable to deliver the solution?

Are the Working Group aware of any other requirements that are required?

Any other comments/questions?

■ Next Steps



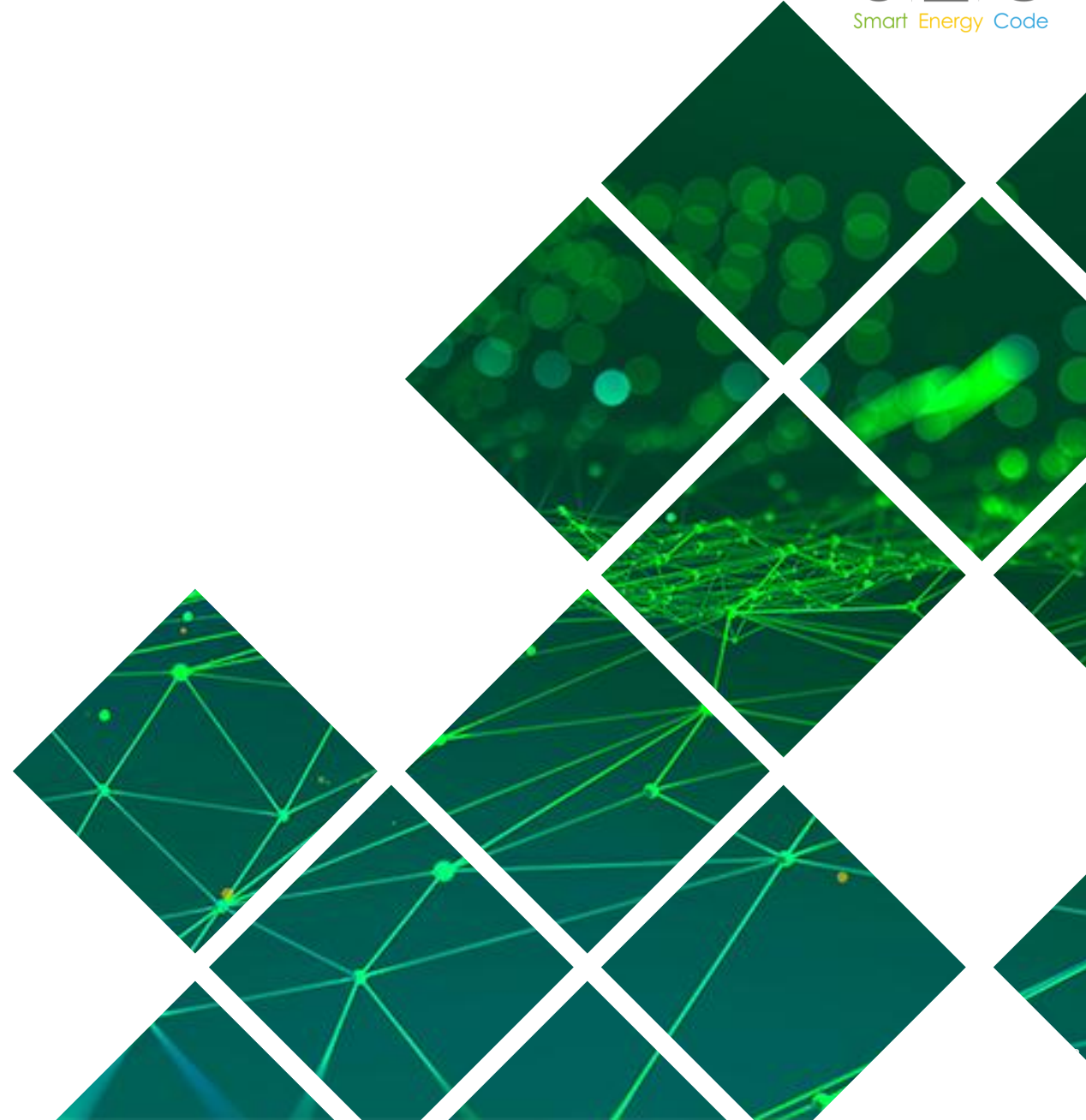
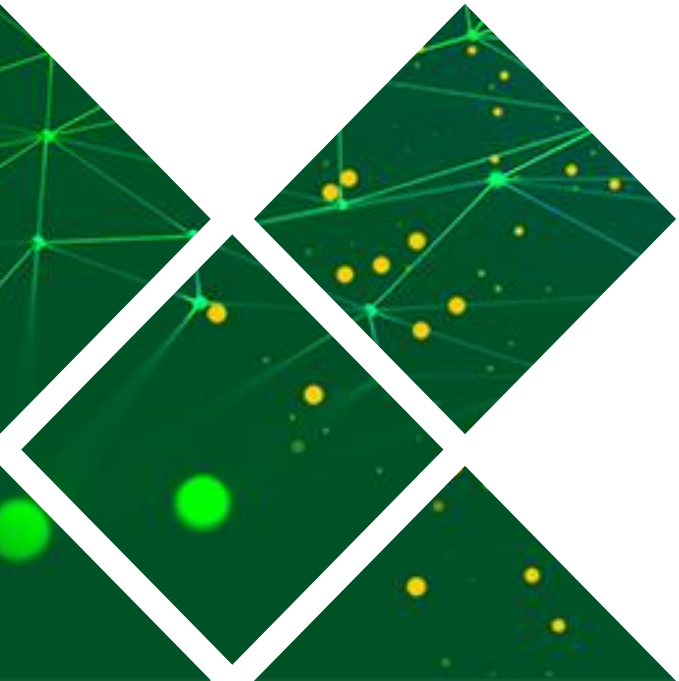


Thank you for
listening

Any questions?

SEC Issues Group

May 2025



■ Issues Group – For Electricity Network Operators to receive 3 Supplier Alerts

Elizabeth Woods

Raised by Ben Elmy from UK Power Networks

TBC

Objectives of the Issues Group

REVIEW	The issue
AGREE	The next steps

■ Supplier non-mandated Alerts

0x81B7

Incorrect Phase
Sequencing

0x81B8

Incorrect Polarity

0x81BB

Reverse Current

Issue

- These Alerts are non-mandated for Suppliers, however, are vital when installing a new ESME.
- Whenever the network is altered, these safety Alerts could be an early indicator of issues.
- Network Operators would like visibility of these Alerts, so that more cross polarity and out of phase issues can be identified and actioned sooner to increase safety of customers.

Impacts

- A reverse polarity or incorrect phase issue could be missed after network alterations have taken place.
- This could lead to safety issues inside customer properties.

■ Proposed Solution



- 0x81B8 - Incorrect Polarity
- 0x81B7 - Incorrect phase sequencing
- 0x81BB - Reverse Current

Could allow for more robust modelling to be put in place for cross polarity and out of phase issues be identified and actioned sooner to increase safety of customers

Questions for the Issues Group

Has the issue been clearly defined?

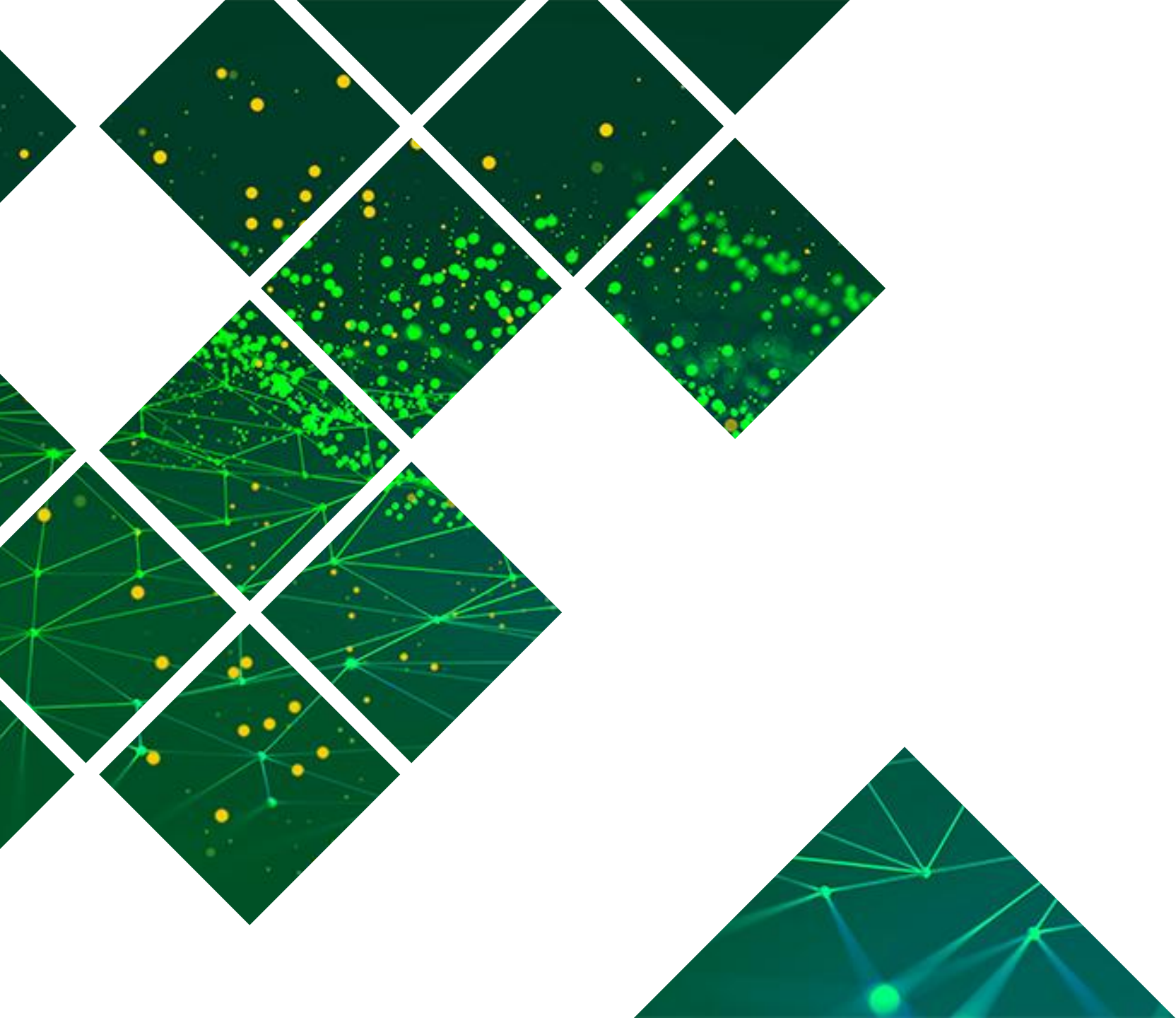
Has the Issues Group identified other possible ramifications of the issue or benefits for the Proposed Solution?

Has the Issues Group identified other possible solutions to the issue?

Anything else that should be considered?

■ Next Steps





Thank you for listening

Any questions?

Issues Group – Deferment of DCC Planned Maintenance during Adverse Weather

Lydia Bentley

Raised by Catherine Duggan of Electricity North West Limited (ENWL)

TBC

■ Objectives of the Issues Group

REVIEW	The issue
AGREE	The next steps

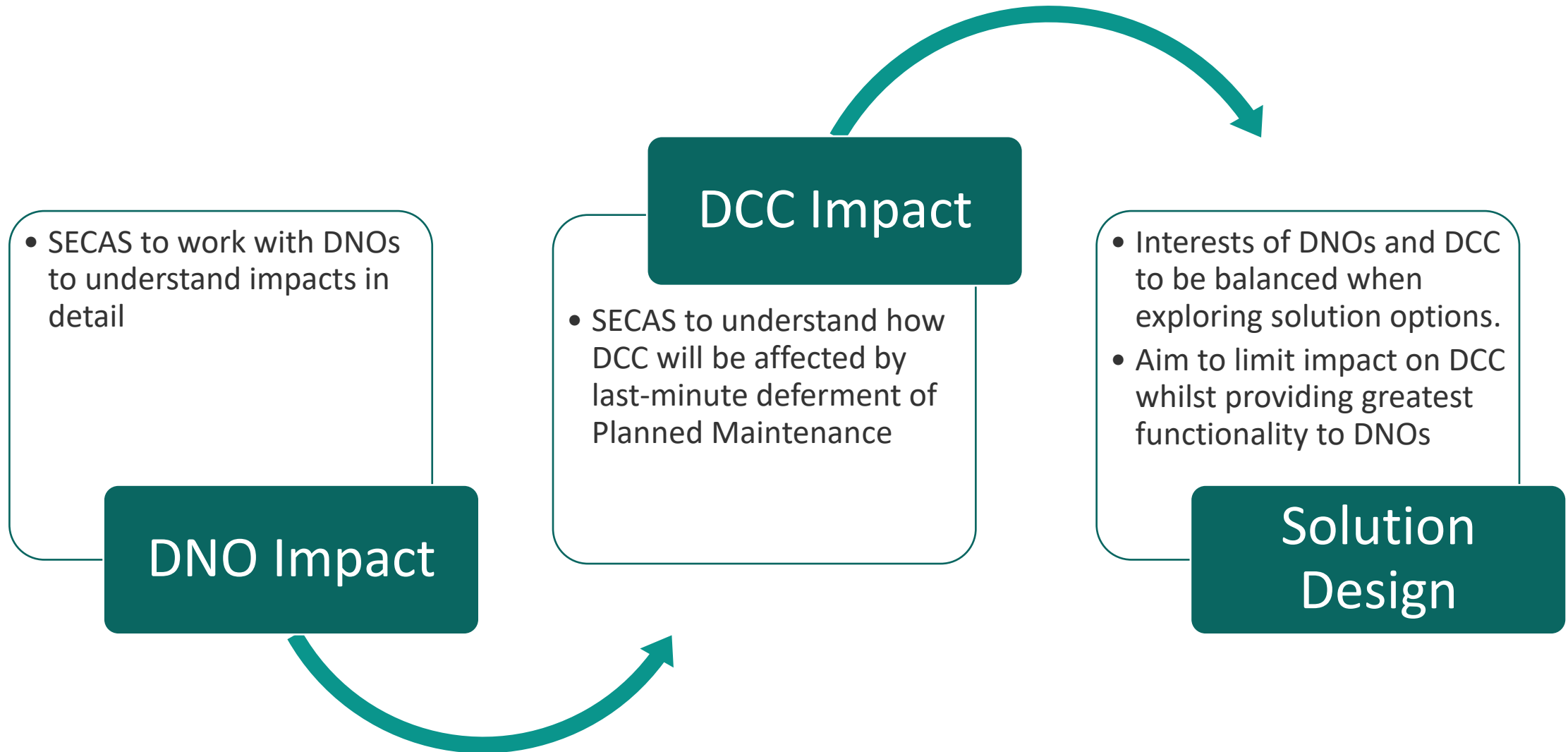
Issue

- The DCC periodically undertakes Planned Maintenance, during which Smart Meters cannot be communicated with.
- During an adverse weather event, DNOs communicate with Smart Meters to check whether they affected by storm-induced outages.
- Where these two events coincide, DNOs are less able to confirm the operability of Smart Meters in their portfolios.

Impacts

- Planned Maintenance/Storm Overlap (i.e., Daragh) has significant commercial and operational impacts on DNOs.

■ Proposed Development Summary



■ Questions for the Issues Group

Anything else that needs to be considered?



Any other comments?



Next Steps



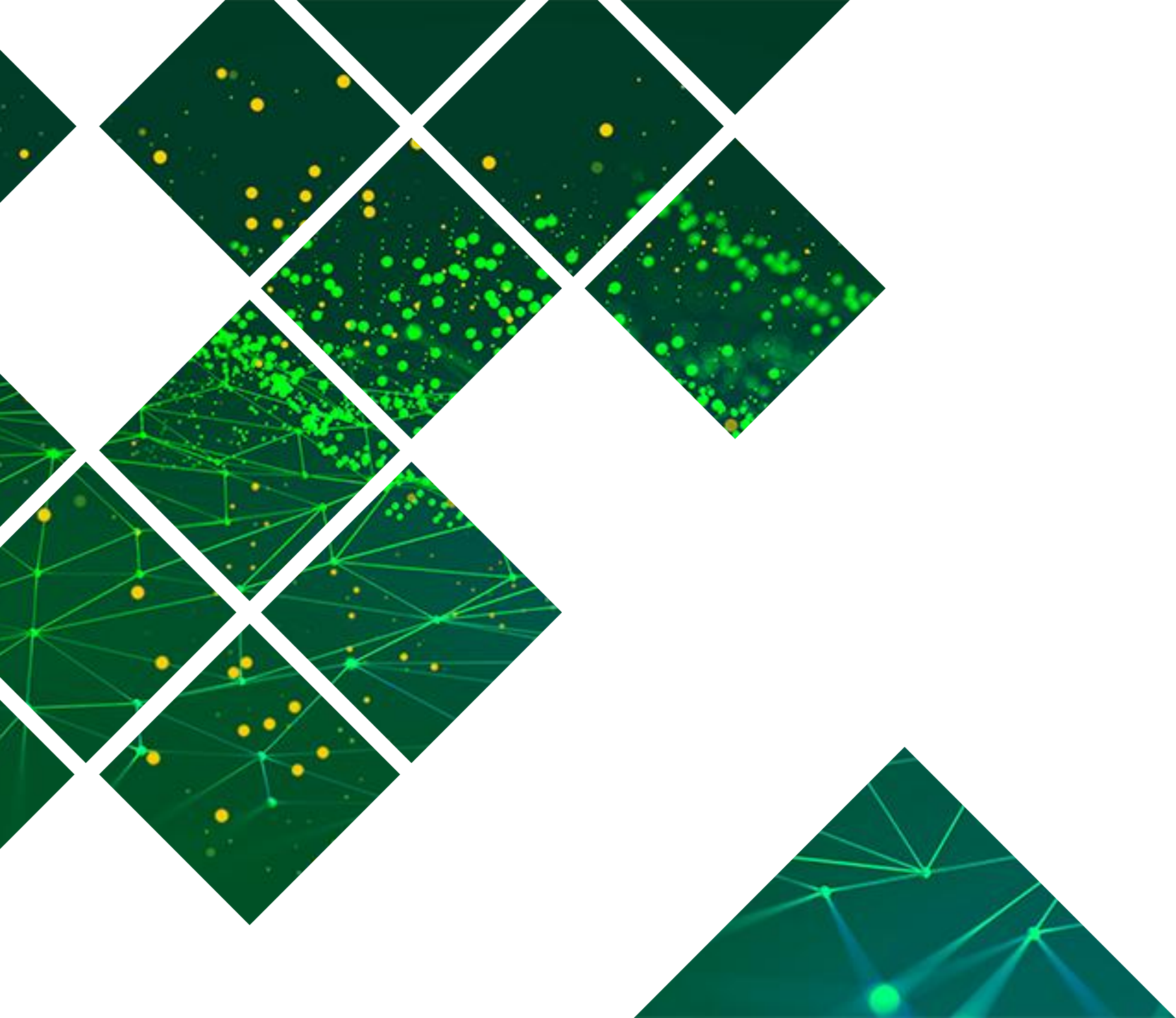
Change Sub-
Committee
TBD – June
Provisionally



Business
requirements
TBD



Working Group
TBD



Thank you for
listening

Any questions?

YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

March Episode: IPV 4G CH's programme and overview of MP285 'Radio Teleswitch Service switch off'

April Episode: Overview of the resubmission of the DCC Assessments, an update on MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter and MP287 'Access to historic GSME battery Alerts'

**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 4 June 2025

