This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

SEC Change Board Meeting 112

25 March 2026, 10:00 – 13:15

Teleconference

SECCB_112_2503 – Final Minutes

Attendees:

Representing	Change Board Members	Organisation
Change Board Chair	Georgiana Severin (GS)	SEC Change Team
Large Suppliers	Emma Johnson (EJ)	British Gas
	Alex Hurcombe (AH)	EDF
	Sharon Armitage (SA)	E.ON
	Joey Manners (JM)	Octopus Energy
	Emslie Law (EL)	OVO
	David Rodger (DRo)	Scottish Power
	Harry Palmer (HP)	Utilita
Small Suppliers	Carolyn Burns (CB)	ESG Global
	Christie Thomson (CT)	SSE
	Gareth Evans (GE)	Waters Wye
Network Parties	Rachael Prosser (RP)	National Grid Electricity Distribution
	Ben Elmy (BE)	UK Power Networks
	Tom Stuart (TS) *(part meeting)*	WW Utilities
Other SEC Parties	Ian Lovatt (IL)	Chameleon Technology
	Mark McGuire (MM)	Stark

	Patrick Caiger-Smith (PCS)	Green Energy Options
Consumers	Caroline Farquhar (CF)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	David Rollason (DR)
Ofgem		
Shaun McRaith (SMc)	Ellie Osobina (EO)	
SEC Change Team		
Khaleda Hussain (KH)	Simon Grimwood (SG)	Megan White (MW)
Lydia Bentley (LB)	Talia Lattimore (TL)	Marc Rhodes (MR)

Apologies:

Representing	Change Board Members	Organisation
Small Suppliers	Christie Thomson (CT)	SSE

1. Approval of Previous Meeting Minute

The Smart Energy Code (SEC) Change Team (MW) informed the Change Board that no comments had been received on the previous meeting minutes, SECCB_110_2801, and the Change Board **APPROVED** the minutes as final.

2. Change Board Vote

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

The SEC Change Team (LB) introduced MP234 'Addition of Public Task and Legitimate Interests into the SEC', an Authority-Determined Modification proposing amendments to SEC Section I 'Data Privacy' to allow access to consumer consumption Data using the UK General Data Protection Regulation (GDPR) lawful bases of Public Task and Legitimate Interests, in addition to the existing mechanism of Unambiguous Consent. The Modification also introduces amendments to the Privacy Controls Framework (PCF), and introduces a new document, the Approved Use List, to be overseen by the Privacy Sub-Committee (PSC). LB explained that the Modification seeks to enable broader service provision, particularly to support vulnerable consumers and public interest outcomes, but acknowledged views indicating significant privacy and consumer trust considerations.

The SEC Change Team (LB) summarised feedback, noting extensive engagement with the PSC and Working Group. Concerns raised included potential erosion of consumer control over Data, impacts on trust in Smart Metering, and whether existing consent-based mechanisms undermine the use-case of the Proposed Solution.

LB highlighted that responses to the Modification Report Consultation were predominantly opposed, with respondents citing risks to Data protection and consumer confidence. LB explained that, following informal engagement with the Information Commissioner's Office (ICO), it had become clear that the PSC should reconsider the draft PCF in light of ICO feedback. LB also provided a view of the Refinement Consultation responses also, which, in contrast to the Modification Report Consultation, were predominately in favour of the Proposed Solution.

As a result, the SEC Change Team proposed that MP234 should return to the Change Sub-Committee, in order to allow the Privacy Sub-Committee to reconsider the draft PCF changes in light of the feedback received from the ICO.

A Large Supplier Representative (EJ) raised a question regarding the DCC costs incurred as a result of this Modification, stating that although the Modification itself is not DCC system-impacting, it may have additional costs in the form of increased traffic from Other Users accessing consumer Data. The DCC (DW) concurred but added that there would be no feasible manner in which the DCC could quantify the costs for potential traffic usage. LB affirmed this view and stated that the question of increased DCC System traffic had been considered, but on the basis any increase is hypothetical until post go-live, that it could not be quantified during the Refinement of the Modification.

An Other SEC Party member (PCS) questioned the way in which Data would be used, whether it would be locational Data related to a particular property, or anonymised Data. PCS went on to state that there should be a clear distinction between anonymised Data and particular Data relating to premises. The Legitimate Interest or Public Task threshold would be much lower in cases of anonymised Data. LB stated that the PSC would consider each application individually and make a determination. However, also adding that as part of the further considerations needed for this Modification, this point could also be included.

Another Large Supplier member (HP) challenged the targeted release date, as organisations have privacy policies that would be impacted and require updating as a result of the implementation of MP234, and the current targeted release date does not allow for any work that would be required of organisations to do this update. The SEC Change Team (LB) clarified that the reasoning for the target release date was a result of the responses to the Refinement Consultation where no quantifiable lead time was indicated by any of the Parties who highlighted an impact on their privacy policy. Nonetheless, this would be considered further.

A Large Supplier member (JM) questioned the send-back to the Change Sub-Committee to allow further consideration in light of the ICO feedback, highlighting the risk that it may not result in a positive outcome, if Parties remain unhappy with the progression of the Modification. The SEC Change Team (LB) acknowledged the point and added that the Authority are required to make a decision having full access to the information surrounding this Modification. Even if the outcome does not materially change, it would give the Authority the most up to date information to consider when making a final determination.

A Small Supplier member (CB) questioned the send back to the Change Sub-Committee and subsequent steps needed to come back to Change Board, and the timelines for this work to take place. LB confirmed it would follow a timeframe that will allow for PSC input, a secondary Modification Report Consultation and return to Change Board. A Small Supplier Representative (CB) asked whether the proposed return to the Refinement Phase was intended (in part) to allow for Parties that had not previously responded to the initial Modification Report Consultation to respond to a second Consultation. The SEC Change Team (LB) assured the Member that the need to return to the Change Sub-Committee was solely for reconsideration of the PCF by the PSC, but that any Party will be welcome to submit a response to the second Modification Report Consultation.

The Change Board **AGREED** that MP234 should be sent back to the Change Sub-Committee pending further consideration given to the Privacy Controls Framework by the Privacy Sub-Committee in light of Information Commissioner Office (ICO) informal views.

MP289 'BCDR Engagement'

The SEC Change Team (TL) presented MP289 'BCDR Engagement' , a Self-Governance Modification raised by the DCC, which sought to amend engagement and notification requirements for Business Continuity and Disaster Recovery (BCDR) testing. The proposal aimed to distinguish between service impacting and non-service impacting tests, while introducing a BCDR Testing Approach document to improve transparency.

TL added that the Modification Report Consultation received three responses: two Network Parties opposed the change, and one Large Supplier supported it. The opposing respondents raised concerns regarding reduced safeguards, visibility and assurance, particularly in relation to operational risk and interaction with other ongoing Modifications.

A Member (EJ) raised concerns around the rejection comments received from Network Parties to the Modification Report Consultation, highlighting their preference for the Modification to be held back until the comments were addressed. Another Change Board Member, representing Network Parties (RP) supported this suggestion. They added that the introduction of the proposed solution for this Modification would, in their view, restrict the solution discussed as part of MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'. Another Member of the Change Board (BE) added that BCDR is service impacting, which would be categorised as planned maintenance. Therefore, there was concern that this approach and the timings would impact the ability to implement the enhanced availability solution in MP293.

The DCC (DR) stated that the Modification was intended to streamline engagement only for non-service impacting tests, such as desk-based exercises, and that service-impacting tests would continue to be subject to full notification and consultation requirements. TL added that the proposed BCDR Testing Approach document provided additional definition and examples of service-impacting and non-service-impacting tests, and that the DCC had updated this document following consultation feedback.

Member (SA) questioned how BCDR engagement related to adverse weather events. DR clarified that BCDR testing that may impact service provision is planned outside of the winter period as much as reasonably practicable. However, the approval of MP289 would not deter the development of MP293, as the aim of MP293 would be to reduce the impact specifically around storm events. SEC Change Team (LB) added that the drafted legal text for MP293 states that the enhanced solution would apply to any DCC planned service disruptions, which includes BCDR and this should provide some reassurance to SEC Parties that the enhanced availability will be switched on during BCDR testing, if it coincides with an adverse weather event.

Member (CB) questioned what further work would be required if the Modification did not proceed to vote at this meeting. Members (RP) and (BE) agreed that this Modification should be subject to a further workshop with Network Parties to ensure the legal text is secured against potential scenarios of mis-categorisation, where a BCDR test was prescribed as non-impacting but did end up having an impact on services. DR clarified that in such scenarios, DCC would be non-compliant with its SEC obligation to consult and notify, which is not the intention of the Modification. The desk-based scenario was described again, emphasising that it would not impact Parties, but the current wording in the SEC still requires a 60 Working-Day notice period and consultation.

A Member (EJ) added that they shared the same concerns as Network Parties regarding potential mis-categorisation. DR reiterated that the DCC will have a strong view of service impacting and non-service impacting testing, and its wish is to remain compliant with the SEC. DR exemplified the benefits of the Modification in relation to MP293, where a deference to planned maintenance that includes BCDR testing is made to account for adverse weather, the BCDR testing will not be able to resume two days later, as the DCC would be in breach of the 60 Working Day-window notice and consultation. In their view, this Modification is not impacting MP293 but rather supports it.

After canvassing views across all Party categories, the Change Board Chair (GS) concluded that there was broad support for deferring the decision to facilitate further engagement.

The Change Board unanimously:

- **AGREED** to defer the vote on MP289 'BCDR Engagement' at this meeting and be brought back to a future Change Board meeting.
- **AGREED** that SEC Change Team and the DCC should convene a workshop with Network Parties and other interested Parties to explore the outstanding concerns.

SECCB112/01: SEC Change Team & DCC to facilitate a workshop with network parties and interested User groups to discuss and attempt to resolve concerns regarding the BCDR engagement Modification before bringing it back to the Change Board for a final vote.

MP312 'Caching SRV 4.10 for SMETS1 Devices'

The SEC Change Team (GS) presented an update on a Modification concerning MP312 'Caching SRV 4.10 for SMETS1 Devices'

The SEC Change Team (GS) presented MP312, a High Priority Modification raised by the DCC, which proposed caching Service Request Variant 4.10 Data for Smart Metering Equipment Technical Specifications 1 (SMETS1) Devices to reduce the volume of SMS traffic required to retrieve meter Data. The Change Board was advised that changes in user behaviour following Enrolment and Adoption had led to significant and ongoing costs.

GS summarised industry views, noting support from the Issues Group, Security Sub-Committee and Working Group. All respondents to the Modification Report Consultation supported approval, though some requested monitoring of benefit realisation post-implementation.

During discussion, Member (EJ) clarified that respondents' concerns related to tracking whether the anticipated cost avoidance was realised, rather than firmware rollout. DCC (BB) and (TT) confirmed that benefit realisation could be monitored and reported through post-decision delivery updates. The Change Board Chair (GS) confirmed this information can be presented at the Change Sub-Committee on a quarterly basis.

Members (HP) and (BE), raised observations regarding underlying Data quality issues and network usage. The DCC responded that the Modification addressed cost avoidance related to message volume rather than Data accuracy, and that any broader Data quality concerns would need to be addressed separately.

Following this discussion, the Change Board agreed to proceed to vote.

The voting outcome was as follows:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	7	0	0	**Approve**
Small Suppliers	2	0	0	**Approve**
Network Parties	2	0	0	**Approve**
Other SEC Parties	3	0	0	**Approve**
Consumers	1	0	0	**Approve**
			Overall conclusion:	**Approve**

The Change Board voted to **APPROVE** MP312 under Self-Governance on the basis that it will better facilitate SEC Objective (a)[1] and (b)[2]. Part of the Change Board considered it would also facilitate SEC Objective (f)[3].

The Change Board **NOTED** the update.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the SEC Panel. This referral period will close at **5pm on 8 April 2026**. If no referrals are received the decision will be final, this will be implemented in February 2027 SEC Release.

Requests for Impact Assessments

MP184 'Increase smart capability of SMETS2 Twin Element ESME to support solar and storage use cases'

The SEC Change Team (MR) presented an update on a Modification concerning MP184 'Increase smart capability of SMETS2 Twin Element ESME to support solar and storage use cases'. MR explained that the Modification sought to enable export Data to be collected from the secondary element of a twin-element Electricity Smart Metering Equipment (ESME), thereby supporting solar and storage use cases.

MR noted that Proposer engagement had been minimal throughout the lifecycle of the Modification. They explained that, as a result, SEC Change and the DCC had worked to progress the Modification to a point where requirements could be defined and indicative costs obtained, despite having had to infer aspects of the business case in the absence of proposer input.

The proposed requirements were outlined, including the creation of an active export register on the secondary element, support for time-of-use tariffs, profile Data logs for export, the introduction of an export MPAN for the secondary element, and the availability of export Data via the HAN. MR also noted that existing reporting for export on the primary element would need to be extended to include secondary element Data.

MR summarised views from the Working Group and the Technical Architecture and Business Architecture Sub-Committee (TABASC), explaining that both groups had raised concerns regarding the scale and cost of the change, the implications of introducing an additional Meter Point Administration

[1] facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britian
[2] facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
[3] ensure the protection of Data and the security of Data and Systems in the operation of this Code

Number (MPAN), and the complexity this would introduce into DCC systems. TABASC had also questioned whether existing metering arrangements were insufficient and noted that the original business case appeared to have diminished over time, particularly as alternative solutions (such as the installation of twin meters) were being deployed in practice.

MR confirmed that only two responses had been received to the Refinement Consultation, one in support and one opposed. Respondents had cited estimated DCC costs in the range of £250k–£499k, with lead times of 12–24 months, driven by firmware and adaptor changes, further noting that, while the Modification might enable innovation, no respondent had articulated a sufficiently strong use case to justify the costs. MR summarised that the impacted parties would include the DCC, Device Manufacturers and Meter Installers, with estimated DCC costs of £350k–£550k, clarifying that further investigation would be required were a Full Impact Assessment (FIA) to be requested.

The DCC (DW) clarified that the costs presented related solely to DCC system and service provider impacts and did not include any costs that might be incurred by meter manufacturers, which could not be quantified at this stage. Large Supplier Representative (EL) raised concerns that there was no corresponding change in registration systems to support the proposed functionality and queried why the Modification continued to be progressed in the absence of proposer engagement. The Change Board Chair (GS) responded that the SEC Modification process is proposer-driven and that, despite repeated attempts, SEC Change had been unable to secure active engagement from the proposer.

The SEC Change Team (MR) explained that SEC Change had no mechanism to reject a Modification unilaterally and was therefore progressing MP184 to a decision point so that it could be formally concluded. SEC Change (SG) confirmed that, while there was no specific obligation requiring SEC Change to progress every Modification indefinitely, SEC Change considered it inappropriate for Modifications to remain open without resolution and was therefore seeking Change Board direction.

Further concerns were raised by Member (SA), who noted that the Modification had been open for a considerable period and questioned whether continued effort was proportionate given the lack of proposer support. Simon Grimwood acknowledged the inefficiency but reiterated that SEC Change was seeking to bring the Modification to a conclusion. EJ echoed these concerns and expressed a preference for the Modification to be closed, noting that the Change Board had previously faced similar situations where uncooperative proposers had not withdrawn Modifications.

DW added that progressing the Modification had also required effort from DCC service providers and did not represent a good return on investment.

A Member (HP) highlighted broader concerns with the Modification process, suggesting that the absence of minimum proposer engagement requirements resulted in wasted effort across industry and should be raised through SEC governance channels.

Following discussion, SEC Change confirmed that the decision before the Change Board was whether to request a DCC Impact Assessment (DCCIA), at an estimated cost of £58,532, with a delivery timeframe of 40 Working Days.

The Change Board proceeded to vote on whether to request the DCCIA.

The voting outcome was as follows:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	0	7	0	**Reject**
Small Suppliers	0	2	0	**Reject**
Network Parties	0	2	0	**Reject**
Other SEC Parties	0	3	0	**Reject**
Consumers	0	1	0	**Reject**
Overall conclusion:				**Reject**

With unanimous agreement across all voting members, the Change Board **AGREED** that a Full Impact Assessment should not be requested due to its limited involvement from the Proposer as well as limited business case.

MP281 'Install Codes in the SMI'

The SEC Change Team (MR) presented an update on a Modification concerning MP281 'Install Codes in the SMI', which sought to address issues arising where suppliers acquire devices without the associated install codes, leading to unnecessary meter exchanges. MR explained that the existing email-based solution introduced under MP121 was no longer fit for purpose due to volume and operational burden.

The SEC Change Team (MR) outlined the proposed Future Service Management (FSM) solution, which would introduce a secure database to store install codes, addressing both legacy installations and future installs. They explained that the solution would operate independently of the DSP and could be implemented more quickly, with a target of November 2026. Limitations of the FSM solution were discussed, including restricted access for MAPs and Manufacturers. MR explained that access could be managed via authorised users or Rules-Based Access Control (RBAC).

A Member (CB) raised concerns regarding duplication risks, noting that devices are often not associated with a supplier until installation. MR acknowledged the point and confirmed that validation controls would be implemented to avoid duplication, emphasising that the solution introduced no new obligations but provided an opportunity for voluntary upload.

MR explained that three Preliminary Impact Assessments had been undertaken and that the FSM solution offered significantly lower costs and shorter delivery times than Data Service Providers (DSP) options. MR noted strong support from the Working Group and positive feedback from the SSC and confirmed that all eight respondents to the Refinement Consultation supported progressing the Modification.

The DCC costs were outlined as £27k–£35k, with benefits including reduced operational cost, fewer unnecessary meter exchanges, and improved consumer outcomes.

The Change Board agreed to proceed to a vote on whether to request a DCC Impact Assessment for the FSM solution.

The voting outcome was as follows:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	7	0	0	**Approve**
Small Suppliers	3	0	0	**Approve**
Network Parties	3	0	0	**Approve**
Other SEC Parties	2	0	0	**Approve**
Consumers	1	0	0	**Approve**
Overall conclusion:				**Approve**

The Change Board unanimously voted to **APPROVE** the request for a full DCC Impact Assessment for MP281.

3. SEC Modification Timetable

SEC Change Team (KH) delivered an update on the active SEC Modifications noting that there were 33 active Modifications and five Modifications on hold. KH highlighted the Modifications on hold and the high priority Modifications stating there was no change from last month's updates.

The Change Board **NOTED** the updates on the SEC Modification Timetables.

4. SDS Prioritisation Changes

The Change Board Chair (GS) provided an overview of proposed changes to Modification prioritisation arising from Code Reform, including the move to three equally weighted criteria: alignment with strategic direction, importance, and complexity. The Change Board Chair (GS) explained that future Modifications would be categorised as either High or Standard priority.

The Change Board **NOTED** the update.

5. Any other business

The Change Board Chair (GS) reminded members that a Doodle poll remained open for an ad-hoc Change Board meeting relating to MP293 and encouraged members to respond or nominate alternates to ensure quorum.

A Member (EJ) highlighted an ongoing consultation relating to Performance Assurance artefacts and encouraged members to engage, noting that it did not have an MP reference.

The SEC Change Team agreed to circulate further information via the weekly Change email.

There were no further items for discussion, and the Change Board Chair closed the meeting.

Next scheduled meeting date: 22 April 2026