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SEC Change Board Meeting 68

27 July 2022, 10:00 – 11:52

Teleconference

SECCB_68_2707 - Draft Minutes

Attendees:

Category	Change Board Members
Change Board Chair	David Kemp (DK)
Large Suppliers	David Rodger (DR)
	Rochelle Harrison (RH) <i>(Alternate for Emma Johnson)</i>
	Alex Hurcombe (AH)
	Martin Hanley (MH) <i>(Alternate for Emslie Law) (Part)</i>
	Robert Johnstone (RJ)
	Sharon Armitage (SA)
Small Suppliers	Gareth Evans (GE) <i>(Part)</i>
	Carolyn Burns (CB)
Network Parties	Gemma Slaney (GS)
	Stephen Charlton (SC)
	Andy Clasper (AC)
Other SEC Parties	Nick Winfield (NW) <i>(alternate for Alastair Cobb)</i>
	Mike Woodhall (MW)
	Patrick Caiger-Smith (PCS)
Consumers	Ed Rees (ER)

Representing	Other Participants
Data Communications Company (DCC)	David Walsh (DW)
	Del Kang (DKa) <i>(Part)</i>
	Tom Rothery (TR) <i>(Part)</i>

Representing	Other Participants
Ofgem	Scott McPhillimy (SM)
	Sinead Quinn (SQ) <i>(Part)</i>
	Jamie Flaherty (JF)
SECAS	Alison Beard (AB)
	Elizabeth Woods (EW)
	Mike Fenn (MF)
	Bradley Baker (BB)
	Kev Duddy (KD)
	Rebecca Sawyer (RS) <i>(Meeting Secretariat)</i>
Elxon	Angela Love (AL) <i>(Part)</i>
MHHS Programme	Justin Andrews (JA) <i>(Part)</i>

Apologies:

Representing	Participant
Large Suppliers	Emslie Law
	Emma Johnson
Other SEC Parties	Alastair Cobb

1. Approval of Previous Meeting Minutes

The Meeting Secretary (RS) confirmed no comments were received on the minutes from the previous Change Board meeting held on Wednesday 22 June 2022. The Change Board **APPROVED** the minutes as final.

2. Actions Outstanding

Action Reference	Action
67/01	SECAS and the DCC to ensure that the relevant DCC guidance documents are prepared and proactively circulated to Users suitably in advance of the SSI and MP109 changes being implemented
This action is in progress and is expected to be completed by September. Status: Open	

3. Change Board Votes for Decision

MP162 'SEC Changes required to deliver MHHS'

The Change Board was invited to perform the final vote on [MP162 'SEC Changes required to deliver MHHS'](#).

The Chair provided an update on MP162 and invited the Chair of the Market-Wide Half-Hourly Settlement (MHHS) Programme's Design Advisory Group (DAG) (JA) to provide any further views from the Programme on MP162.

The DAG's position is that a 24-hour Target Response Time (TRT) is required, which MP162 delivers on. There was also a statement that delivery of 162 is required as part the wider MHHS programme. However, the modification also sets out a differential-Scheduled read window for MDR users, which some members of the DAG considers may create an uneven playing field between the independent Meter Data Retrieval (MDR) Agents, acting as third parties on behalf of Suppliers, and the Suppliers collecting the data for themselves. The DAG has been looking at the Supplier, Agent and settlement perspectives and trying to identify the materiality of the read window issue.

A Change Board member (GS) noted their concern that there are unanswered questions as to the best course of progression. MP162 is required for MHHS, and the DCC's differential-Scheduled read window approach is a key part of its solution design. Changes are likely to be difficult to achieve, given the limited flexibility in the solution set up. This may impact the ability to edit the solution design in the future if a later Modification was to be submitted to change the Read window Please note this was not discussed in the meeting and would need to be verified separately. They were not clear MP162 is ready to proceed to decision.

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Another member (GE) agreed and stated that they feel that there are questions around the governance and requirements coming from one programme being progressed under another programme that are yet unanswered. Members queried if it was possible to measure the impact of any delays in MP162's progression on the DCC and the MHHS programme.

A member (GS) also noted that the end-to-end solution is linked to a Retail Energy Code (REC) change that must be implemented at the same time, which means that the whole end-to-end process is not yet known and so cannot be fully assessed. Please note that a Change Request for this change has been issued and is being assessed currently. The scope of that CR has been established and agreed.

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The Change Board considered if MP162 might benefit from being returned to the Working Group for further work. One member (CB) considered that if this was to happen, the Working Group would need to be provided with clear objectives and a lot of help, given their exhaustive investigation into the modification already. They also noted that there has been limited interest from Small Suppliers to date, including there being no positive confirmation that any would appoint a third-party MDR, and raises the question, given the large costs, of who will actually benefit from the changes.

A member (GE) noted that Small Suppliers are interested in MHHS and would be more likely to use third-party MDRs. Until recently smaller Suppliers' attention has been on Faster Switching, but now this is complete they will likely become more engaged with MHHS. They also considered it important there is as open a market as possible.

The DAG Chair (JS) considered that the issue is with the differential-Scheduled read windows but was unclear how fundamental this was to the DCC's solution. They also noted that this is part of the solution but not part of the legal text and queried how this would be governed. They also noted the

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numerous requirements for accessing smart metering data and queried if a hierarchy of access needed to be explored.

The DCC (DW) explained that they had investigated a scenario of fixed and variable costs proposed for a solution without the proposed ~~differential Scheduled~~ read windows. If the DCC need to give MDRs the same On Demand access to Service Requests as Suppliers, the costs will go up. The DCC's estimate is that the costs would be of the range provided in the Preliminary Assessment (between £29m and £59m) to provide MDRs with the same access as the Suppliers. If the modification was returned to the Working Group through the to produce a different solution, this is likely the ballpark that any cost provided through Impact Assessment would fall into.

Elexon (AL) noted the modification being returned to the Working Group or deferring implementation of the solution was likely to negatively impact the MHHS timetable, noting the benefits on consumers that MHHS is projected to deliver.

The Chair asked the Change Board if they were ready to proceed to vote and summarised the discussion. A member (AH) enquired what the impacts would be if the modification was rejected. The Chair (DK) explained that if the modification is rejected a new modification may be raised under SEC or the work could be absorbed under the programme and progressed alongside the other Code changes being developed for delivery via Smart Meter Act powers. The Chair also confirmed that the Change Board vote, whether it be to approve or to reject, would form a recommendation to the Authority, and that the final decision would rest with the Authority either way.

The member also queried if this issue is linked to the Target Operating Model (TOM) requirements, and whether there is an opportunity for that to be reviewed and changed. The DAG Chair (JA) noted this would need to be raised with the Programme for assessment, and the final decision on any changes to the TOM would rest with Ofgem.

Change Board Vote

The Chair first asked the Change Board if it believed MP162 was ready to proceed to vote. The voting outcome is shown below:

Party Category	Send back	Proceed to vote	Abstain	Conclusion
Large Suppliers	0	6	0	Proceed to vote
Small Suppliers	1	1	0	Proceed to vote
Network Parties	2	0	1	Send back
Other SEC Parties	0	3	0	Proceed to vote
Consumers	0	1	0	Proceed to vote
Overall conclusion:				Proceed to vote

Change Board members noted the concerns discussed and felt in principle that MP162 is not yet ready to proceed to decision.

The members who voted to send the modification back were concerned by the end-to-end solution not being clear, the concerns raised over the cost allocation, and the split in governance between the programme and the SEC modification process. The MHHS Programme is also undertaking a replan which may revise the overall programme timelines, which one member felt could allow more time to work on the solution.



Other members shared these concerns, but on balance considered it would be more effective to move MP162 to the next stage of the process and submit it to the Authority for consideration. One member noted there seemed to be no escalation route and no clear guidance, and the only way to escalate this seemed to be to send this forward. Members were also unclear whether any benefit would be realised from sending the solution back to the Working Group for further work.

The Change Board therefore agreed by majority to proceed to vote, and the voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	0	6	0	Reject
Small Suppliers	0	2	0	Reject
Network Parties	0	0	3	-
Other SEC Parties	0	2	1	Reject
Consumers	0	1	0	Reject
Overall conclusion:				Reject

Large Supplier members were comfortable with the technical solution and noted their support for MHHS. However, they were not comfortable with how the costs for this change would be apportioned. Some members were supportive of the new User Role, though one member did query whether it was needed. Considering this, Large Suppliers voted to recommend rejection.

Small Supplier members also noted the concerns over costs, and that no Small Supplier Parties, who would be most likely to appoint a third-party MDR, had expressed support or an intent to use the solution. They also voted to recommend rejection.

Network Party members abstained from the vote. The Electricity Network Party members support the modification and MHHS, but considered the outstanding issues meant MP162 was not ready to be voted on. The Gas Network Party member abstained as Gas Network Parties are not involved in or impacted by MHHS.

Other SEC Party members noted the views given by Suppliers, and that there was no clear consensus the eventual solution would be as currently proposed. They therefore recommended rejection. One member abstained, considering the modification was not ready to be approved.

The Consumer member recommended rejection, considering this modification was not yet ready to be approved.

Following the vote, an Ofgem representative (SQ) informed the Change Board that the Authority will take the comments raised into account when making its decision. Elexon (AL) recommended that an action be raised to look at the Code change landscape and discuss this with Ofgem and other Codes to see what lessons can be learnt for the future. A Change Board member (GE) agreed. They suggested that the Cross Code Advisory Group (CCAG) should be driving the discussions on the MHHS changes.

ACTION 68/01: SECAS to work with Ofgem and other Codes to look at the Code change landscape and consider any lessons to be learnt for the future

The Chair noted that SECAS will also be undertaking its own lessons learnt exercise and will discuss any findings with the relevant groups.

The Change Board:

- **AGREED** that MP162 should proceed to vote;
- **RECOMMENDED** to the Authority that this Modification Proposal should be **REJECTED**; and
- **PROVIDED** rationale for this recommendation against the General SEC Objectives.

MP186 'Section D review (2020): further enhancements

The Change Board was invited to perform the final vote on [MP186 'Section D review \(2020\): further enhancements](#).

The Change Board had no comments on this modification and proceeded to vote.

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP186 will better facilitate SEC Objective (g)¹ for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** this Modification Proposal should proceed to vote;
- **RECOMMENDED** to the Authority that this Modification Proposal should be **APPROVED**; and
- **PROVIDED** rationale for this recommendation against the General SEC Objectives

MP096 'DNO power Outage Alerts'

SECAS (BB) provided an overview of [MP096 'DNO power Outage Alerts'](#) and requested that the vote be deferred until the next Change Board meeting while the DCC works with Distribution Network Operators (DNOs) and SECAS to agree details around the reports that will be generated from the Proposed Solution.

The Change Board **DEFERRED** the vote until the next meeting.

MP181 'Meter Asset Provider and Device Manufacturer assess to asset related data held by the DCC'

¹ Facilitate the effective and transparent administration and implementation of this Code



The Change Board was invited to perform the final vote on [MP181 'Meter Asset Provider and Device Manufacturer assess to asset related data held by the DCC'](#).

The Change Board had no comments and proceeded to vote.

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP096 will better facilitate SEC Objective (a)² & (c)³ for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** that MP181 should proceed to vote;
- **AGREED** that MP181 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this decision against the General SEC Objectives.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the Change Sub-Committee (CSC). This referral period will close at **5pm on Thursday 11 August 2022**. If no referrals are notified, the decision will be final and MP181 will be implemented in the November 2022 SEC Release.

MP128A 'Gas Network Operators SMKI Requirements'

The Change Board was invited to perform the final vote on [MP128A 'Gas Network Operators SMKI Requirements'](#)

The DCC (DW) queried the June 2023 implementation date and asked if this could be earlier given the modification is a text-only change. SECAS (MF) responded that Parties wanted time to decommission their High Security Modules (HSMs) and therefore the changes will be included in a later SEC release to allow time for this.

The Change Board had no further comments and proceeded to vote.

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve

² Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

³ Facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems



Party Category	Approve	Reject	Abstain	Conclusion
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP128A will better facilitate SEC Objective (a) for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** that MP128A should proceed to vote;
- **AGREED** that MP128A should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this decision against the General SEC Objectives.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the CSC. This referral period will close at **5pm on Thursday 11 August 2022**. If no referrals are notified, the decision will be final and MP128A will be implemented in the June 2023 SEC Release.

MP160 'Certificate Signing Request forecasting'

The Change Board was invited to perform the final vote on [MP160 'Certificate Signing Request forecasting'](#).

The Change Board had no comments and proceeded to vote:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP160 will better facilitate SEC Objectives (a) and (b)⁴ for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** that MP160 should proceed to vote;
- **AGREED** that MP160 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this decision against the General SEC Objectives.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the CSC. This referral period will close at **5pm on Thursday 11 August 2022**. If no

⁴ Enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence



referrals are notified, the decision will be final and MP160 will be implemented in the November 2022 SEC Release.

MP204 'Incorporation of Category 3 Issue Resolution proposals into the SEC – Batch 8'

The Change Board was invited to perform the final vote on [MP204 'Incorporation of Category 3 Issue Resolution proposals into the SEC – Batch 8'](#)

The Change Board had no comments and proceeded to vote.

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP204 will better facilitate SEC Objective (a) for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** that MP204 should proceed to vote;
- **AGREED** that MP204 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this decision against the General SEC Objectives.

There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the CSC. This referral period will close at **5pm on Thursday 11 August 2022**. If no referrals are notified, the decision will be final and MP204 will be implemented in the November 2022 SEC Release.

MP209 'Lifetime CPA Certificates'

The Change Board were invited to perform the final vote on [MP209 'Lifetime CPA Certificates'](#).

SECAS (KD) provided an update regarding the Commercial Product Assurance (CPA) Certificates which are beginning to expire and that there is some uncertainty regarding the re-certification process. SECAS proposed to update the Central Products List (CPL) to differentiate Certificate types and a reference certificate renewal within the SEC. The National Cyber Security Centre (NCSC) will then provide lifetime certificates as Devices' certificates expire. Guidance is being developed with the Security Sub-Committee (SSC) which may be amended following Devices being put through the process.

One member (AC) had raised a concern prior to the meeting regarding certificates being up for renewal if the governance has not yet been finalised. SECAS had responded that the SSC is actively

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managing the risk and will take decisions whether to remove devices from the CPL based on risk, rather than just that they have expired.

The Change Board had no comments and proceeded to vote:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	Approve
Small Suppliers	1	0	0	Approve
Network Parties	3	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	1	0	0	Approve
Overall conclusion:				Approve

The view of the Change Board is that MP209 will better facilitate SEC Objective (a) & (f)⁵ for the reasons given by the Proposer in the Modification Report.

The Change Board:

- **AGREED** that MP209 should proceed to vote;
- **AGREED** that MP209 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this decision against the General SEC Objectives.

Due to the need to implement this solution as soon as possible, MP209 will be implemented on 1 August 2022. There will be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the CSC. This referral period will close at **5pm on Thursday 11 August 2022**. If any referrals are notified and the Change Board's decision was subsequently overturned, the changes would be subsequently backed out of the SEC.

4. Any Other Business

There was no further business, and the Chair closed the meeting.

Next scheduled meeting date: 24 August 2022

⁵ Ensure the protection of Data and the security of Data and Systems in the operation of this Code