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SEC Change Board Meeting 81

23 August 2023, 09:30 – 10:50

Teleconference

SECCB_81_2308 – Final Minutes

Attendees:

Category	Change Board Members
Change Board Chair	Ali Beard (AB)
Large Suppliers	David Rodger (DR)
	Kevin Woollard (KW) (<i>alternate for Emma Johnson</i>)
	Kevin Clark (KC)
	Sharon Armitage (SA) (<i>part meeting</i>)
	Amy Cox (ACo) (<i>alternate for Alex Hurcombe</i>)
Small Suppliers	Daniel Davies (DD) (<i>alternate for Carolyn Burns</i>)
	Christie Thomson (CT)
Network Parties	Jacqueline D'Angelo (JDA)
	Andy Clasper (ACI)
Other SEC Parties	Patrick Caiger-Smith (PCS)
	Tony Pile (TP) (<i>alternate for Nick Winfield</i>)
	Ian Lovatt (IL)
Consumers	Tung Hing Sum (THS) (<i>alternate for Caroline Farquhar</i>)

Representing	Other Participants
Data Communications Company (DCC)	David Walsh (DW) (<i>part meeting</i>)
Ofgem	Jamie Flaherty (JF)

Representing	Other Participants
	Grace Royall (GR)
Security Sub-Committee	Gordon Hextall (GH) <i>(part meeting)</i>
n3rgy	Matt Roderick (MR) <i>(part meeting)</i>
SECAS	Rachel Black (RB) <i>(Meeting Secretariat)</i>
	Liz Woods (EW)
	Ben Giblin (BG)
	Simon Grimwood (SG)
	Kev Duddy (KD)
	James Hosen (JH)
	Eloise Evans (EE)

Apologies:

Representing	Other Participants
Consumers	Caroline Farquhar (CF)
Other SEC Parties	Nick Winfield (NW)
Large Suppliers	Emma Johnson (EJ)
	Emslie Law (EL)
	Alex Hurcombe (AH)
Small Suppliers	Carolyn Burns (CB)
	Gareth Evans (GE)

1. Approval of Previous Meeting Minutes

The Meeting Secretary (RB) informed the Change Board that no comments had been received on the previous meeting minutes. The Change Board **APPROVED** the minutes as final.

2. Actions Outstanding

Action Reference	Action
71/01	The DCC to provide a view on the share of the MP162 costs each Supplier would be apportioned.

Action Reference	Action
	The Chair advised that this action is ongoing and will remain open. Status: Open
76/01	SECAS to confirm how the wider work on decisions around Device installation end dates will be taken forward.
	The Chair advised that SECAS are in discussions with the Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair to see how this can be investigated more effectively. Status: Open

3. Change Board Votes

MP211 'Aligning the SMI with the CPL'

The Change Board was invited to perform the final vote on [MP211 'Aligning the SMI with the CPL'](#).

A Change Board member (DR) sought clarification where a Device is 'Suspended', would they be able to check the current Firmware Version, and if processing from an incorrect Firmware Version to a new 'Current' Firmware Version, would that process remain the same. SECAS confirmed it would be business as usual process for upgrading Firmware Versions and in a 'Suspended' state, DCC Users can still send SR 11.2 'Read Firmware Version'. The member noted that this was not clearly outlined in the Modification Report. The Chair acknowledged this and advised that this is a 'business as usual' process that will not be affected, but this will be noted in the Conclusions Report.

A Change Board member (KW) highlighted that in their Modification Report Consultation response they queried whether the DCC could provide a report for all Pre-Payment N51 Alerts issued. SECAS confirmed that the DCC are unable to provide this report as N51 Alerts granular data is sent directly to each Supplier and not kept on record at the DCC. They added that Suppliers will need to check their N51 Alerts before MP211 is implemented or if there is particular concern for Pre-Payment Devices, Suppliers can send SR 11.2 'Read Firmware Version' to check if those Devices are on the correct Firmware Version or whether a new N51 Alert is triggered.

Another Change Board member (JDA) asked if a Device is in a 'Suspended' state, is the only SR 11.1 'Update Firmware' to update a new firmware version. SECAS confirmed DCC Users can send SR 11.2 'Read Firmware Version' and SR 11.1 'Update Firmware' for Devices which are 'Suspended'. The member queried the impacts on Network Parties. SECAS highlighted that 'Electricity Distributor' and 'Gas Transporter' are both eligible DCC User Roles to send SR 11.2 'Read Firmware Version', which could cause a Device to become 'Suspended' in these instances. They added that the Electricity Network Parties will not be able to obtain any data from the Device following it being marked as 'Suspended' and that the Responsible Supplier would receive the N51 Alert to notify it that the Device had been suspended.

A Change Board member (ACI) noted that Gas Transporters are not DCC Users. SECAS advised that although they may not currently DCC Users, they are an eligible DCC User to send this SR if they wish to become a DCC User in future. The member noted this and added that this is dependent on Gas Transporter setting up those links in the first place, which they have not. The Chair advised that this will be included in the Conclusions Report.

A Change Board member (DR) sought clarification where a Device is 'Suspended', would they be able to check the current Firmware Version, and if processing from an incorrect Firmware Version to a new 'Current' Firmware Version, would that process remain the same. SECAS confirmed it would be business as usual process for upgrading Firmware Versions and in a 'Suspended' state, DCC Users can still send SR 11.2 'Read Firmware Version'.

The Change Board agreed to proceed to vote. The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	4	0	0	Approve
Small Suppliers	2	0	0	Approve
Network Parties	2	0	0	Approve
Other SEC Parties	3	0	0	Approve
Consumers	0	0	1	Abstain
Overall conclusion:				Approve

The view of the Change Board is that MP211 will better facilitate SEC Objective (a)¹ and (f)² for the reasons given by the Proposer in the Modification Report. One member also noted that it will better facilitate SEC Objective (c)³.

The Change Board:

- **AGREED** that this Modification Proposal should proceed to vote
- **APPROVED** the Modification Proposal under Self-Governance
- **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 7 September 2023**. If no referrals are notified, the decision will be final.

MP219 'Accessing Consumption Data on behalf of SEC Parties'

The Change Board was invited to perform the final vote on [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#).

A Change Board member (IL) raised concerns about this modification compromising consumer trust. They questioned the existing consent methods used by Other Users to collect Unambiguous Consent from Consumers and asked if there were any examples of the time this is taking Other Users to prove it is an issue. The Proposer (MR) acknowledged this, adding that there are lots of different consent models which can be used by Other Users. They reiterated that this modification means that the Other User will be able to use the employing Parties Appropriate Permission to collect Consumption Data. As such, Other Users will not need to use any consent methods, as they will not need to collect the Unambiguous Consent of each Energy Consumer.

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

² To ensure the protection of Data and the security of Data and Systems in the operation of this Code.

³ Facilitate energy consumers management of their use of electricity and gas through the provision of appropriate information via smart metering systems.

In particular, if this modification is approved and implemented, the Proposer advised that if the Supplier has consent from their consumer to engage in the Demand-Flexibility Scheme (DFS), then the Supplier can direct the Other User without asking the consumer for consent again. Therefore, the responsibility is put on the Supplier, and it will make it easier for the consumer to give their consent. The member asked why the Other User is not identified in the first instance when the Consumer provides the Unambiguous Consent to the Supplier to collect their Consumption Data. The Proposer agreed that this could occur, but in most instances when a Consumer changes Supplier, at that particular time they only consent to the new Supplier collecting Consumption Data for billing purposes, rather than an extension to also allow Other Users to collect their Consumption Data in other scenarios. Subsequently the Supplier may wish to outsource collection of data to an Other User.

Another Change Board member (KW) referred to the wording on page 16 of the final Modification Report, where it states that the modification better facilitates SEC Objectives (a) and (c). The member noted that Other Users are to access consumer data and make it available to make informed decisions about usage. The member noted that the role of the Other Users does not appear as restricted as it is in the legal text, which might be why some parties have expressed concerns. The Chair advised that this can be noted in the Conclusions Report after this meeting. SECAS (BG) also noted that this was raised during the Modification Report Consultation. SECAS (BG) noted that a response had been provided, with the Chair agreeing that wording could have been clearer. SECAS (BG) clarified that Other Users can only collect the Consumption Data and pass it to the employing Party.

A Change Board member (JDA) queried if this modification sets the precedent for allowing individuals who are non-SEC Parties to access Energy Consumers Consumption Data. The member noted that Network Operators have challenges accessing meter reading data and referred to the security protocols in their own system. SECAS confirmed that Other Users are registered SEC Parties who undergo rigorous privacy assessments and security checks before they can operate. In addition, SECAS noted that this modification has been built around the definition of 'Appropriate Permission' and who can access data without collecting Unambiguous Consent. Only Suppliers and Network Parties hold Appropriate Permission and only those who choose to contract out the service to an Other User will be affected.

The member also noted that consumers tend to not use their In-Home Display (IHD) unless they're checking their usage on the IHD screen. The member observed that Consumers may not engage with an Other User collecting their Consumption Data if they have to provide Unambiguous Consent through the IHD. As such, the member noted that this modification had the possibility to increase participation in initiatives such as the Demand-Flexibility Scheme.

The Chair acknowledged this and advised that the change this modification will bring means that the IHD will not be needed for consent.

Another Change Board member (TP) asked for clarification regarding what consent the consumer is giving the Supplier. The member asked if it is simply standard consent that is initially offered when the consumer receives the Smart Meter. The member noted that the DFS scheme was mentioned earlier in the meeting and asked if this is part of the same initial request for consumer approval. The Proposer advised this depends on the Supplier who participates in the DFS but agreed that in the majority of cases standard consent is obtained. They added that the contract between the Supplier and Energy Consumer details what consent has been provided. In addition, they clarified that with the DFS the Consumer currently must provide Unambiguous Consent to take part, with this modification allowing the Other User to collect the Consumption Data upon direction from the employing Party.

A Change Board member (ACo) noted that throughout the modification process, many SEC Parties had expressed concern about the impact of MP219 on Consumer data. They added that they had been reassured by the work completed by SECAS and the discussions during the meeting. The member noted that there are only changes to Supplier processes should they choose to employ an Other User to collect Consumption Data on their behalf. SECAS (BG) noted this and added that the Other User could only collect the Consumption Data and pass it back to the employing Party.

The member asked who will be monitoring this to ensure the Other User adheres to this. SECAS advised that the Independent Privacy Auditor will monitor this, with three new checks being introduced to the Privacy Controls Framework as part of the modification. Furthermore, the legal text has been drafted in such a manner that the employing party is liable for the actions of the Other User. This is to ensure that the Other User does not collect data from any consumer who is not a customer of the employing Party.

One member noted that given there had been several questions raised during the meeting, whether SECAS should consider taking the modification away to complete further investigation. SECAS responded noting that all development of the solution to address the concerns raised had been completed. The Change Sub-Committee had agreed that the solution development and the Modification Report were complete. SECAS confirmed discussions at the meeting would be included in the Conclusions Report. In particular, issues raised such as an increase in traffic or a potential decrease in smart metering installs because of this modification being approved cannot be calculated. As such, SECAS noted that the modification had been paused twice for further questions to be answered and that it was appropriate for the modification to undergo final vote. No other Change Board members questioned progression to the vote.

One other Change Board member asked why Network Parties had been included in the drafting of this modification. SECAS noted that as part of the definition of Appropriate Permission, both Suppliers and Network Parties are included and can collect Consumption Data in accordance with their Energy Licences. As such, Network Parties have been included as part of the modification.

The Proposer highlighted that they are aware of several Suppliers who are looking to rely on this modification as part of DFS this winter. They noted that it would allow consumers to partake in the scheme more easily.

The Change Board agreed to proceed to vote. The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers ⁴	4	0	1	Approve
Small Suppliers	2	0	0	Approve
Network Parties	1	0	1	Approve
Other SEC Parties	1	0	2	Approve
Consumers	0	1	0	Reject
Overall conclusion:				Approve

The view of the majority of the Change Board is that MP219 will better facilitate SEC Objectives (a) and (c). One member advised that they were neutral on the facilitation of SEC Objective (a). The

⁴ Please note, a fifth Large Supplier joined the meeting after the MP211, which is why there were four Large Suppliers voting for MP211, and five Large Suppliers voting here.

Consumers Representative (THS) stated that they voted to reject as they did not agree it would better facilitate SEC Objective (f).

The Change Board:

- **AGREED** that this Modification Proposal should proceed to vote
- **AGREED** to recommend this Modification Proposal to the Authority to be approved
- **PROVIDED** rationale for this decision against the General SEC Objectives

This is an Authority-Determined modification and will now be sent to Ofgem for final decision. SECAS will notify the Change Board when Ofgem returns with their decision.

4. Request for Impact Assessment

SECMP0028 'Prioritising System Messages'

The Change Board was presented with the DCC Impact Assessment request for [SECMP0028 'Prioritising System Messages'](#).

The DCC (DW) advised that this modification is not related to [MP162 'SEC changes required to deliver MHHS'](#) but is related to work on capacity uplifts. The Chair clarified that the capacity uplift work is occurring because of MP162, and the DCC agreed with this.

A Change Board member (JDA) highlighted that some Network Parties felt underrepresented during the Refinement Consultation and asked that this be taken into consideration. The Chair acknowledged this and agreed this would be considered going forward.

Another Change Board member (DD) noted that there is a maintenance release scheduled for October 2023, that will prioritise issues that assist the prepayment scheme. The member noted that this might mean the modification is not as necessary but agreed that it is still worth requesting an Impact Assessment. The DCC (DW) agreed and advised that it focuses on moving information from the Data Service Provider (DSP) to the Service Providers. The DCC stated that northbound prioritisation should not be impacted because of this. The Chair asked if it would make current northbound prioritisation plans more flexible, and the DCC agreed.

The Change Board:

- **AGREED** that the DCC Impact Assessment should be requested.

5. Any other business

SECAS (RB) advised the Change Board that the Panel Information Policy has been updated to v6.0 and outlined the key changes to each of the classifications in terms of information sharing.

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

Next scheduled meeting date: 20 September 2023