SEC
Smart Energy Code

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SEC Change Board Meeting 82

20 September 2023, 10:00 – 11:15

Teleconference

SECCB_82_2009 – Final Minutes

Attendees:

Category	Change Board Members
Change Board Chair	Ali Beard (AB)
Large Suppliers	David Rodger (DR)
	Emma Johnson (EJ)
	Kevin Clark (KC)
	Sharon Armitage (SA)
	Alex Hurcombe (AH)
	Emslie Law (EL)
Small Suppliers	Carolyn Burns (CB)
	Christie Thomson (CThom)
Network Parties	Jacqueline D'Angelo (JDA)
	Andy Clasper (AC)
Other SEC Parties	Patrick Caiger-Smith (PCS)
	Nick Winfield (NW)
	Ian Lovatt (IL)

Representing	Other Participants
Data Communications Company (DCC)	David Walsh (DW)
	Chris Thompson (CThomp)
Ofgem	Scott McPhillimy (SMcP)

Representing	Other Participants
SECAS	Rachel Black (RB) *(Meeting Secretariat)*
	Bradley Baker (BB)

Apologies:

Representing	Other Participants
Consumers	Caroline Farquhar (CF)
Small Suppliers	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.
The DCC (DW) advised that the apportioned costs continue to be investigated. A Change Board member (EL) highlighted that this action has been open for 11 months, and suggested that a date be confirmed for when this will be finalised. The DCC advised that this is outside of their jurisdiction, but hope to confirm a date soon, and noted that this action has been continuously worked on since it's been opened. The DCC stated that the costs are dependent on the capacity uplift part of MP162, which is outside of the modification process. The member highlighted that the action had been for the DCC to provide the cost breakdown associated for each Supplier. The DCC acknowledged this, but advised that they cannot provide that information until they have the fixed charges for Users for that year calculated, which is based on the percentage of market share of each Supplier and Distribution Network Operator (DNO). This will not happen until the capacity uplift is implemented. The Chair asked if £12 million will be the final cost. The DCC advised that the MP162 part was £3 million, and the capacity uplift part is estimated at being £13 million but this is still in progress. Another Change Board member (JDA) questioned why DNOs would be apportioned any costs when it seems to be an issue for Suppliers. The Change Board member (EL) advised that Ofgem decided this, and that DNOs will be paying to enable Meter Data Retrieval (MDR) to be rolled out by the DCC, and will also be paying for the DCC uplift capacity, in order for the DCC to offer market-wide half-hourly services to the industry. The Chair acknowledged the concerns raised, and advised that they will invite someone with more information to next month's meeting, and ask them to provide a breakdown of the costs and a confirmed date of when we can expect the next update. **Status**: Open	

Action Reference	Action
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 about Technical Specification Applicability Tables (TSAT) and are considering other options. They confirmed that they are still investigating the issue. **Status**: Open	

3. Change Board Votes

MP167B 'Review of SEC documents (DCC Internal Systems change governance)'

The Change Board was invited to perform the final vote on MP167B 'Review of SEC documents (DCC Internal Systems change governance)'.

No comments were received from the Change Board.

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

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

The view of the Change Board is that MP167B will better facilitate SEC Objective (a)[1], (e)[2] and (g)[3] for the reasons given by the Proposer in the Modification Report. Some members also noted that it will better facilitate SEC Objective (b)[4].

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 Wednesday 4 October 2023.** If no referrals are notified, the decision will be final.

[1] Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.
[2] Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.
[3] Facilitate the efficient and transparent administration and implementation of the SEC.
[4] To enable the Data Communications Company to comply at all times with the General Objectives of the Data.

MP245 'SMKI Document Set Changes 2023'

The Change Board was invited to perform the final vote on MP245 'SMKI Document Set Changes 2023'.

No comments were received from the Change Board.

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

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

The view of the Change Board is that MP245 will better facilitate SEC Objectives (g)[5] for the reasons given in the Modification Report.

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 Wednesday 4 October 2023.** If no referrals are notified, the decision will be final.

4. Request for Impact Assessment

MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

The Change Board was presented with the DCC Impact Assessment request for MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'.

A Change Board member (EL) noted that the slides suggested that the solution would fix the three million Devices that have been identified as 'not working'. They asked if all three million smart meters will be upgraded successfully using this solution. The Chair explained that all three million smart meters would not be dealt with, but that the Proposer stated that the number would not be that large if Other Users and Registered Supplier Agents (RSAs) were able to update the firmware versions. The member highlighted that they would only be completing one part of the process, and Suppliers still need to complete the activation part of it.

The member believes that the issue should be resolved by performance improvement through the Operations Group (OPSG) rather than by a modification. The member observed that the statements

[5] To facilitate the efficient and transparent administration and implementation of this Code.

the Proposer has made do not relate back to Other Parties being able to upgrade the firmware. The member also noted that their company has dedicated teams that focus on firmware and did not see the use of enabling another party to send out part of the firmware.

Another Change Board member (JDA) advised that firmware issues on smart meters have impacted DNOs' ability to use smart metering data to its full potential. The member stated that they initially thought this modification would resolve the issue, as it would help complete the smart meter roll out and assist with successful firmware upgrading. However, the member stated they would have more support for this modification if it was raised by a Supplier, as Suppliers have more knowledge of this.

A Change Board member (EL) expressed concern that the Proposer is not taking feedback into consideration and highlighted that no Party has stepped forward to support this modification. The Chair acknowledged these concerns, and advised that SECAS, in its critical friend role, has advised the Proposer of this. However, the Proposer has insisted that the modification be progressed through the SEC Modification Process. The Chair advised that they investigated if the issue could be resolved through Elective Service, but this was not possible. A Change Board member (CB) queried why the Elective Service route was not possible. The DCC (DW) advised that the Elective Service is limited to Data Communications Company User Interface Specification (DUIS) changes, and this would be considered a Changing User role. The DCC advised this would provide the RSA with a plus type new User role which cannot be done via Elective Service.

Another Change Board member (IL) advised that they would like to see evidence that Suppliers who cannot update smart meters completely will be able to complete the activate firmware command. The member also recognised the issue with outdated firmware. The member advised that they struggled to see the point of being able to queue up software releases to go to the smart meter if the Supplier is still unable to activate it. The Chair agreed that RSAs can send firmware but will not be able to activate it. The Chair advised that the SSC specified this, and they did not agree to RSAs activating firmware, so the Supplier would still need to activate it when the RSAs send it out. The Chair explained that the SSC want the Supplier to be in complete control of the activation of firmware. The member acknowledged this, and advised this modification makes the issue of accountability vague.

A Change Board member (EL) asked for clarification of the issue that needs to be resolved. The Chair advised that it is concerned with outdated firmware. The member advised that this modification is not resolving that issue. The member acknowledged that some Small Suppliers do not have the capability to carry out these updates, but there are Other Users who can do this for them, and not only RSAs. The member highlighted that there are many challenges associated with upgrading firmware, such as contractual and technical issues. However, the member stated that if it is a significant issue for Suppliers, it should have been raised by them. The Chair acknowledged these concerns and advised that they have asked the Proposer for evidence that Suppliers have come forward to say they require this service, which SECAS would keep confidential, but the Proposer has not provided this evidence.

A Change Board member (EJ) asked if this is an Authority-Determined modification, in order for Ofgem to be able to make a decision on it. The Chair advised that it is a Self-Governance modification. Ofgem (SMcP) advised that if it is rejected as a Self-Governance modification, the Proposer can appeal the decision to Ofgem. Therefore, the modification can be brought before Ofgem despite it not being an Authority-Determined modification.

Another Change Board member (CB) stated that a Small Supplier responded to the last consultation, and they confirmed that they would reject the modification due to the complexity and costs associated with it. The member added that the issue of outdated firmware is an industry issue, not only a Small Supplier issue. The Chair noted this and stated that SECAS hold a monthly Small Supplier call, where they have asked Small Suppliers if they would be interested in this modification, and no support was received.

A Change Board member (EJ) stated that they do not agree with the Impact Assessment being requested. The member highlighted that there is no beneficial business case associated with it, and there are concerns regarding the Preliminary Impact Assessment cost. The member queried if the modification could be put on hold until the Proposer provides evidence that Small Suppliers require this service. The Chair acknowledged the concerns raised but stated that it is the Proposer's decision whether to put a modification on hold or not. The Chair advised that the Proposer believes the cost is worth it. In addition, the Chair stated that the Proposer believes they have enough interest in this modification to create a service, and it would improve the health of smart meters and smart flexibility services. The member asked if the Change Board has a choice in this situation. The Chair advised that the Change Board can reject the Impact Assessment request. The Chair advised that Ofgem requires SECAS to complete a full assessment before a modification progresses to a Change Board vote. The Chair stated that SECAS have confirmed with the DCC the Preliminary Assessment cost within a certain range of accuracy. The DCC (DW) advised that there is a difference between the two costs, as the Preliminary Impact Assessment consists of the design, build and Pre-Integration Testing (PIT), and the Final Impact Assessment includes costs for the entire implementation cycle. The Chair advised that they would request more information from the DCC as to how much the cost might change and return with an estimated cost. A Change Board member (EL) suggested that there are Data Service Provider (DSP) costs associated with this also, as it addresses DSP scheduled works. The member highlighted that the majority of the Change Board appear to be unsupportive of this modification progressing, and questioned if they should spend money on something they will reject.

A Change Board member (IL) asked if the Change Board rejects this Impact Assessment request can they state the reasons why they have rejected it. The Chair agreed, and Ofgem added that it would be helpful if the modification goes before them for decision to understand the Change Board's reasons.

The Change Board:

- **REJECTED** the DCC Impact Assessment request.

The Change Board unanimously rejected the DCC Impact Assessment request. They acknowledged that there were challenges with firmware upgrades in the industry, but this modification does not resolve them. The Change Board agreed that this modification has no business case, and expressed frustration that the Proposer has not made themselves available to address the Change Board's concerns. They highlighted that there is a lack of evidence that Small Suppliers support this modification and expressed concerns regarding the high cost associated with this modification. They also noted that it will weaken accountability of the firmware upgrade process.

5. Change Board meeting dates 2024

SECAS (RB) requested that the Change Board agree the 2024 Change Board meeting dates.

The Change Board **DEFERRED** the decision of the 2024 meeting dates until next month's meeting.

6. Any other business

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

Next scheduled meeting date: 25 October 2023