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## SEC Change Board Meeting 87

21 February 2024, 10:00 – 11:55

Teleconference

### SECCB\_87\_2102 – Draft Minutes

#### Attendees:

| Category           | Change Board Members      |
|--------------------|---------------------------|
| Change Board Chair | Ali Beard (AB)            |
| Large Suppliers    | David Rodger (DR)         |
|                    | Emma Johnson (EJ)         |
|                    | Kevin Clark (KC)          |
|                    | Alex Hurcombe (AHu)       |
|                    | Emslie Law (EL)           |
|                    | Sharon Armitage (SA)      |
| Small Suppliers    | Gareth Evans (GE)         |
|                    | Carolyn Burns (CB)        |
| Network Parties    | Jacqueline D'Angelo (JDA) |
|                    | Tom Stuart (TS)           |
|                    | Rachael Prosser (RP)      |
| Other SEC Parties  | Ian Lovatt (IL)           |
|                    | Nick Winfield (NW)        |

| Representing                      | Other Participants                                             |
|-----------------------------------|----------------------------------------------------------------|
| Data Communications Company (DCC) | David Walsh (DW)                                               |
|                                   | Robin Seaby (RS) ( <i>Part meeting – Discussion of MP241</i> ) |
| Ofgem                             | Scott McPhillimy (SMcP)                                        |

| Representing    | Other Participants                                             |
|-----------------|----------------------------------------------------------------|
| Citizens Advice | Emily Stone (ES) ( <i>Part meeting – Discussion of MP241</i> ) |
| SECAS           | Rachel Black (RB) ( <i>Meeting Secretariat</i> )               |
|                 | Kev Duddy (KD)                                                 |
|                 | Ben Giblin (BG)                                                |
|                 | Khaleda Hussain (KH)                                           |
|                 | Mohammedanwar Sumro (MS)                                       |

## Apologies:

| Representing      | Other Participants         |
|-------------------|----------------------------|
| Consumers         | Caroline Farquhar (CF)     |
| Small Suppliers   | Christie Thomson (CT)      |
| Other SEC Parties | Patrick Caiger-Smith (PCS) |

## 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.<br><br>The DCC (DW) advised there are no further updates on this action.<br><b>Status:</b> Open                                                                                                                                                                                                         |
| 86/01            | SECAS to ensure that the DCC discusses the Ofgem funding for the DCC ESS programme with Change Board member (EL) regarding MP176.<br><br>SECAS (EW) advised they are in contact with the DCC to find someone who can speak with EL in relation to this, but have not found anyone yet. They advised they will continue to investigate this.<br><b>Status:</b> Open |
| 86/02            | SECAS to advise the Change Board of the governance and delivery process for the DCC's work on the implementation of the MP176 Alternative Solution.                                                                                                                                                                                                                |

| Action Reference | Action                                                                                                                                                                            |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                  | The Chair advised they are in discussions with the DCC to create a project plan on this, and will share it at the next Change Sub-Committee (CSC) meeting.<br><b>Status:</b> Open |
| 86/03            | The Chair to address the voting process of Modification Proposals when there is an Alternative Solution.                                                                          |
|                  | The Chair confirmed that this will be investigated as part of the end-to-end modification process review.<br><b>Status:</b> Open                                                  |

### 3. Change Board Votes

#### MP223 'WAN Coverage Reporting'

The Change Board was invited to perform the final vote on [MP223 'WAN Coverage Reporting'](#).

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     | 3       | 0      | 0       | Approve    |
| Other SEC Parties   | 2       | 0      | 0       | Approve    |
| Consumers           | -       | -      | -       | -          |
| Overall conclusion: |         |        |         | Approve    |

The view of the majority of the Change Board is that MP223 will better facilitate SEC Objective (a)<sup>1</sup> for the reasons given by the Proposer 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 6 March 2024**. If no referrals are received, the decision will be final.

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

#### 4. Request for Impact Assessment

##### **MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'**

The Change Board was presented with the DCC Impact Assessment request for [MP169 'Managing SEC Obligations and the Consumer's Right to refuse a Smart Meter'](#).

A Change Board member (EJ) queried whether the solution would allow a Smart Meter to be switched to 'Restricted Mode' at any stage after installation. The Proposer (EL) advised that this should only occur at the point of installation. The Proposer stated that they have received rulings from the Energy Ombudsman informing them to install Smart Meters in 'dumb mode', however this is not a possibility given the current SEC Drafting. The member noted this, and asked if it technically possible to install a Smart Meter in a 'dumb mode', even if the SEC does not allow it. The Proposer advised that even if the capability is there, it is not what MP169 is trying to achieve. They highlighted there are other areas of the DCC system that do not have technical prohibitions but it is understood should not be allowed to be used in certain ways. The member acknowledged this, and suggested that the Modification Report detail this.

Another member (IL) asked if the legal text could outline explicitly that this can only occur at the point of installation. The Proposer advised that this is addressed in the title. The member noted this, but advised that the legal text needs to be examined to ensure there is no doubt, and observed that there are various ways to break the system. The Proposer confirmed that a Smart Meter can only be refused at the point of installation.

A member (GE) asked whether the Department for Energy Security and Net Zero (DESNZ) had provided a view on MP169. They also queried where the consumers right to refuse a Smart Meter is written down. In relation to the second question, SECAS (BG) advised that a minister in Parliament stated during a parliamentary debate that the consumers will always have a choice to refuse a Smart Meter. The member noted this, but highlighted that this comment was made several years ago. The Chair advised that Citizens Advice are supportive of MP169, and do not believe Smart Meters should be mandated. The member advised that the Smart Meter Implementation Programme (SMIP) targets do not consider a scenario where a consumer refuses a smart meter. They noted that they must be mindful of the wider impact of this, as these are licence conditions. The Proposer acknowledged this, and explained that the Ombudsman's rulings means Suppliers would be forced to break their SEC and Supply Licence conditions by installing Smart Meters in a 'dumb state'. They advised that they have attempted to engage with regulatory bodies to assist them in what is possible given existing regulations on Suppliers, to which the Ombudsman has stated that Suppliers can install Devices in such a manner. The Proposer reiterated that they disagreed with the Ombudsman view.

Another member (JDA) noted that the new 'Restricted Mode' is similar to the existing 'Suspended' Mode in terms of the SRVs which can be sent to a Device. They noted that when a Device is 'Suspended', it removes any benefits for Distribution Network Operators (DNOs). The member queried if the modification is focusing on Suppliers being unable to meet their targets and making it easier to increase the number of Smart Meter installs. They noted that the Smart Meter population increased quickly, but has now slowed, and noted that 50% of the population have become more resistant to Smart Meters. The member asked if the aim is to overcome this, but lose all benefits of Smart Meters. The Proposer advised that MP169 is not focused on increasing the installation of Smart Meters. They advised MP169 has been raised in response to the Ombudsman advising Suppliers they have to fit Smart Meters in a certain way. SECAS added that this might also result in an increase in the installation of Smart Meters, as it might allay any privacy concerns consumers

have. The Proposer advised that it is up to each Supplier how they fulfil the 'all reasonable steps' obligations to fit a Smart Meter.

The DCC (DW) advised that the proposed change would not be applied retrospectively unless it is specifically highlighted in MP169. They clarified that the DCC does not have responsibility of managing Devices at the premises, only the Supplier does.

A member (DR) expressed concerns regarding consumers refusing a replacement Smart Meters when their existing meter has failed, and asked if this is being addressed here. The Proposer advised that a process would need to be put in place to ensure the consumer does not feel they are being forced to have the Smart Meter installed in an emergency. They advised more discussion will need to be had.

The member referred to the list of Service Requests (SRs) permitted or expected. They noted that there are issues with tariffs, keeping prices up to date on the Smart Meter, Prepayment Interface Devices (PPMIDs), and In Home Displays (IHDs). However, they advised they were content to speak offline with the Proposer about this. The Proposer noted this, and advised that one of the main concerns is that they are not tackling the root cause of this issue, and agreed there are lots of areas to consider. They advised that if it was possible to install a Smart Meter without a Communications Hub to address consumers' concerns they would, but this cannot be done. They agreed that this is not the most suitable solution, but more suitable solutions involve huge costs and changes. However, they still expected this change to be expensive.

A member (KC) observed that this solution enables the consumer's right to refuse a Smart Meter to be met by fitting a Smart Meter and reassuring them that it is not a 'smart' Meter. They highlighted that this will not solve the problem. The Proposer agreed with this.

Another member (AH) advised that their organisation responded to the MP169 Refinement Consultation, and advised they understand why MP169 has been raised. They commented that DESNZ should be involved with this modification. They observed that the consumers right to refuse a Smart Meter and all reasonable steps were challenged during the Automated Meter Reading (AMR) roll out in 2012. They also noted the situation in 2018 where SEC Parties were fined for not taking all reasonable steps, which should be considered as part of this modification. They queried if the SEC is the most suitable place to address this issue. They asked if MP169 will be Authority-Determined. The Chair advised it will be. They noted that aside from the cost and challenges associated with this, they do not believe the issue will remain with install and commission. They observed that there are a lot of factors that need to be considered. They advised it would be useful if these concerns were addressed as MP169 progresses, and noted an agreement needs to be reached with the Ombudsman. The Proposer acknowledged the concerns raised, and advised they have been involved in lots of discussions with SECAS and others. They stated that everyone has agreed that there is an issue, but if a consumer can object to a Smart Meter there needs to be a facility for them to do so.

A member (DR) stated that they did not agree that the DCC Impact Assessment should be requested. However, the rest of the members agreed that the DCC Impact Assessment should be requested.

The Change Board:

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

## MP241 'Interoperability Checker Update'

The Change Board was presented with the DCC Impact Assessment request for [MP241](#) ['Interoperability Checker Update'](#).

A member (EL) asked if 'Smart Mode' is a defined term. The Proposer (RS) confirmed this, and added that it is a feature of the interoperability checker as described in SEC Section H.

The member also noted that because a person has WAN next door to you, does not mean there is WAN where you are. The member asked if any fall out from that will be passed on to the DCC to address. The Proposer agreed that the WAN coverage checker can only give a certain amount of information. However, they noted that this information, along with their system data on the take up in the local area should give consumers an idea of the problem in their area. Therefore, they will have sufficient information to engage with Suppliers. They advised that there is a difference between the regions as in the north WAN is provided at post code levels. However, they stated that they can confirm where the smart meters are installed, and what the take up is in the local area. The member noted this, and stated that it is important that the consumer is given better information. They advised they cannot give accurate information to consumers in the north, as there are many operational challenges. They clarified that the post code has WAN, not the property itself. The Proposer agreed that the way the information is interpreted is critical, so it is important that the information provided is accurate. They noted that there is no independent source of information the consumer can rely on at present. The member agreed, and advised that they do not want the progression of MP241 to be slowed but wants it understood that the ultimate truth needs to reside with the consumers' Supplier. The Proposer acknowledged this and advised that the wording around this change needs to be made clearer regarding the steps a Supplier will take to ensure the consumer has a smart meter.

Another member (SA) recommended that it be made clearer on the checker what the restrictions are and increase the accuracy of the data. The Proposer advised that this will be shown on checker, and there is wording on the Citizens Advice website which describes what the purpose of the checker is, and what the results will tell you. They advised that the wording will need to be unambiguous for consumers on the Citizens Advice website.

A member (DR) advised that they have different rules about which smart meters they can support. They asked if MP241 will have any impact on that Supplier choice, as not all Suppliers can operate all Smart Meters in prepayment mode. The Proposer advised that Suppliers will still have a choice. At present, the interoperability checker is fed by the data Suppliers provide the DCC. They noted that it is an onerous process to maintain data, but it lets Suppliers indicate if there are exceptions to their ability to operate a smart meter. They advised that the DCC could continue to include this function for Suppliers. However, they stated that they can also view if the Supplier has Smart Meters in prepayment mode in its portfolio. The member asked if the Proposer has sufficient information to determine economy 7 and economy 10 information. The Proposer advised they do not, and noted that they will need to determine how widely it is used.

The DCC (DW) expressed concern regarding the Security Sub-Committee's (SSC) view that security architecture changes are to be addressed as part of the Impact Assessment. They advised there are no security architecture changes that need to be addressed as part of MP241. They queried if the SCC were referring to a risk assessment to be updated. However, they highlighted that the DCC does not carry out a risk assessment as part of an Impact Assessment. SECAS (MS) advised they can check this with the SSC. The Proposer suggested that the SSC Chair may be asking for reassurance that they are not proposing changes to the security architecture.

Another member (KC) stated they do not believe there is value for money in this modification. They suggested these conversations would be best had with Suppliers directly, instead of reading about it in the Citizen's Advice website. They also noted that they cannot justify the cost based on the

relatively small user base. The Chair asked if they were referring to MP241 in its entirety, or the Impact Assessment. The member advised they were referring to MP241 in its entirety but added that they still disagree with the Impact Assessment being requested. The Proposer acknowledged this but noted that consumers will often already have contacted their Suppliers in relation to these questions. When consumers reach the point of contacting Citizens Advice, they are often looking for independent source of information to assist in these conversations. The member agreed with this.

A member (AH) advised that they agreed with the points raised by KC. However, they supported the Impact Assessment of MP241 for the services it will provide outside of WAN. They queried if this element will be made redundant with the introduction of CADg Devices. The Proposer advised that the CADg development and delivery will inform policy on where it should be used and how this should be reflected to consumers. This project does not make the changes proposed by MP241 obsolete, however it will have to be kept under review in terms of how data is interpreted and guidance that is put on the Citizens Advice website. They advised that it has no impact on the other part of improving accuracy. The member (AH) noted this but advised that they have no control over what information is provided on the Citizens Advice website, and it may point consumers back to their Supplier, despite already engaging with them. The Proposer advised that the wording on the Citizens Advice website is presented in the most useful way for consumers. However, the process they want to focus on is ensuring they are consulting with Suppliers to ensure they are cited on the information provided.

Another member (EL) supported the points raised by the previous members. They noted that it will be better to move this forward, based on the set up of the SEC Change Process. The Chair acknowledged this and suggested that SECAS could take away the concerns that have been raised and refine them. The member highlighted this work would come with additional costs for industry. The Chair noted this, but stated that if the Impact Assessment is requested, which will cost £10,000, and it comes back with no support, it is wasteful. The Chair highlighted that these discussions had been addressed in Working Groups and during the Refinement Consultation, but if members are unsupportive, they need to understand what will make it more favourable to the members.

A member (CB) suggested it would be more costly to send MP241 back to another Working Group, and a Refinement Consultation, before coming back to the Change Board again. Therefore, they proposed simply moving it forward now as it will be more cost effective. The members (AH and EL) supported this.

The Change Board:

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

**ACTION 87/01:** SECAS to clarify whether SSC requires confirmation of security architecture changes or risk assessment in relation to MP241.

## MP246 'DCC User access to metadata via the DCC Self-Service Interface (SSI)'

The Change Board was presented with the DCC Impact Assessment request for [MP246 'DCC User access to metadata via the DCC Self-Service Interface \(SSI\)'](#).

A member (AH) queried the cost of spending £9,000 on the Impact Assessment, and potentially £10,000 on the Rough Order of Magnitude (ROM) costs, if no one has an issue with this. The DCC (DW) advised that they have a policy with one of their service providers where the Preliminary Impact

Assessment comes in at a very low cost such as this, they progress straight to implementation. They advised that the quote the service provider gives them in at that stage is used as their final cost, but there is a response range for MP246. Another member (EL) agreed with the AH, and asked if the aim of MP246 is to remove the need to report in SSI. The DCC advised that the aim is to ensure the screen is removed correctly. It will also include carrying out regression testing, and ensuring nothing is damaged afterwards. The Chair asked if the cost of the Impact Assessment can be challenged. The DCC stated that the issue with this is that every Impact Assessment is sent through legal and commercial teams. The Chair asked if anyone could do this now. The DCC advised that they cannot progress without permission, and there has been a directive that change is required. The member (EL) queried if changes to the SSI functionality had already been made to allow the DCC to manage them, and it would lower the cost. The DCC explained that the reason the cost is given as a range is due to some service providers returning with a range of costs, and others returning with a figure that has a plus or minus 20% margin attached.

Another member (KC) felt that they do not get enough details of mods driven by the Security Sub-Committee (SSC) to make informed decisions and queried the need for it to be presented to them. SECAS (KD) advised that it is not an SSC change and was recommended by the SEC Panel. The member suggested they could also make these changes easily. The Chair proposed MP246 could be taken away and looked at further. SECAS (KD) expressed concerns about repeated conversations occurring in the Working Group and the Technical Architecture and Business Architecture Sub-Committee (TABASC) incurring more time and cost in the process.

A member (EL) highlighted SEC objective (f)<sup>2</sup>, which MP246 aims to benefit. They noted the investigation costs should not cost more than the work itself. They observed that it is not total system impacting, low complexity and suggested the full impact assessment should not take 40 Working Days. They noted that sections of the SEC would have to be removed to enable this.

The Chair acknowledged the comments raised and reminded members that SEC Section D states that the Change Board members can reject an Impact Assessment request and ask for more information to be provided. A member (AH) advised that they support the request of the Impact Assessment but explained that they do not want to pay for it twice.

Another member (EL) queried the need for this to be a modification. They referred to a process that has been put in place whereby the DCC can turn these systems off without having to raise a modification to do so, and only have to inform SEC Parties that it has been complete. The DCC (DW) agreed with this but advised that the difference here is that it impacts SEC Section H. SECAS (KD) added that it impacts SEC Section I also. The member noted this but queried the need for 40 Working Days to quote for a text change. The DCC explained that there are maintenance release costs, and the process needs to be followed.

The member (EL) stated that they were supportive of the Impact Assessment request for MP246. However, they observed that more work needs to be done on what is included in SSI and reporting in general, for the process to be facilitated easily and effectively. They suggested there must be a more efficient process for such changes than raising a modification each time. The DCC advised that there is a small change process within the DCC whereby there is less administration, and more targeted changes and costs. They advised that this is the route that would be taken if they did not have to go through the modification process.

The Chair took an action to review the process of requesting an Impact Assessment from the Change Board to make it more efficient.

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<sup>2</sup> Ensure the protection of data and the security of data and systems in the operation of the SEC.

The Change Board:

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

**ACTION 87/02:** SECAS to investigate the process of requesting an Impact Assessment from the Change Board to improve its efficiency.

## 5. SEC Modification Timetable

SECAS (BG) provided an update on the timetables for Modification Proposals, providing an updated Prioritisation Matrix and summaries of high and on hold modifications.

No comments were received from the Change Board.

The Change Board:

- **NOTED** the update

## 6. DCC Assessment

The Chair provided an update on the open DCC Assessments.

No comments were received from the Change Board.

The Change Board:

- **NOTED** the update

## 7. Modifications Improvement Project update

The Chair provided an update on the Modifications Improvement Project.

No comments were received from the Change Board.

The Change Board:

- **NOTED** the update

## 8. Any other business

The Chair advised the members that SECAS are planning a Modifications Improvement Project Workshop for Wednesday 28 February at 10am. They advised members to contact SECAS at [sec.change@gemserv.com](mailto:sec.change@gemserv.com) if they wished to be invited to the workshop.

SECAS (RB) advised the members that the CSC are now underway, and the deadline for the call for nominations is Friday 1 March 2024. They encouraged members to email [sec.change@gemserv.com](mailto:sec.change@gemserv.com) if they knew anyone who would like to be nominated, or have any other questions.

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

Next scheduled meeting date: 27 March 2024

DRAFT