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SEC Change Board Meeting 91

26 June 2024, 10:00 – 12:20

Teleconference

SECCB_91_2606 – Final Minutes

Attendees:

Representing	Change Board Members	Organisation
Change Board Chair	Ali Beard	Change Board Chair
Large Suppliers	Alex Hurcombe (AH)	EDF
	Joey Manners (JM)	Octopus Energy
	David Rodger (DR)	Scottish Power
	Emslie Law (EL)	OVO
	Emma Johnson (EJ)	British Gas
	Kevin Clark (KC)	Utilita
	Sharon Armitage (SA)	E.ON
Small Suppliers	Andrew Green (AG) (<i>Alternate</i>)	Waters Wye
	Carolyn Burns (CB)	ESG Global
	Christie Thomson (CT)	SSE
Network Parties	Jacqueline D'Angelo (JDA)	UK Power Networks
	Rachael Prosser (RP)	National Grid Electricity Distribution
Other SEC Parties	Ian Lovatt (IL)	Chameleon Technology
	Nick Winfield (NW)	Landis+Gyr
	Patrick Caiger-Smith (PCS)	GEO Together

Other Participants

DCC		
Bradley Baker (BB)	David Walsh (DW)	
Drax		
Paul Bedford (PB) (<i>Part Meeting – Agenda Item 3</i>)		
n3rgy		
Tereza Borges (TB) (<i>Part Meeting – Agenda Item 3</i>)		
Ofgem		
Grace Royall (GR)		
SECAS		
Rachel Black (RB) (Meeting Secretary)	Ben Giblin (BG)	Kev Duddy (KD)
Liz Woods (EW)	Mohammedanwar Sumro (MS)	Khaleda Hussain (KH)
William Marshall (WM)		
SSE		
James Burney (JB) (<i>Part Meeting – Agenda Item 3</i>)		
TABASC		
Julian Hughes (JH) (<i>Part Meeting – Agenda Item 3</i>)		

Apologies:

Representing	Change Board Members	Organisation
Consumers	Faye Brooke Lewis	Citizens Advice
Network Parties	Tom Stuart	WW Utilities

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.
The DCC (DW) advised more information will be provided on this when it goes live as part of the June 2024 SEC Release. Status: Open	

3. Change Board Votes

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

The Change Board was invited to perform the final vote on [MP246 'DCC User access to metadata via the DCC Self-Service Interface \(SSI\)'](#).

A member (EL) questioned why removing the ability to run a report will cost £25,000. The Chair advised the screens will be hidden and the code will be removed, which is where the cost comes from. The member expressed concerns regarding the cost, and highlighted other projects that need the ability to adjust, remove and add reports that do not cost this amount. They expressed concern that this will disincentivise anyone to change the reporting function in the future as it is very expensive. They stated that this is a negative impact to the change process. Another member (JM) agreed and advised that altering the existing access was quoted as requiring one employee. They advised that someone does not need to be employed specifically to carry this out, but instead this should be made part of an existing employee's role. A member (SA) supported the previous comments, and stated this is a correction of something that should not have been accessible in the first place. The DCC (DW) advised it was highlighted in the Impact Assessment that it does not deal with the report but the screens inside the Self-Service Interface (SSI) and Service Management Incidents (SMI). They advised that there will not be one person employed to carry out this work. They acknowledged the concerns raised regarding the costs but advised the DCC challenged these and managed to reduce them. The DCC advised there will be no additional integration testing and will be tested inside the Data Service Provider (DSP) and Pre Integration Testing (PIT).

The Chair acknowledged the concerns raised regarding the cost and business case of MP246. They asked the Change Board if they agree that all the options have been considered or will the costs need to be challenged further. A member (EL) advised that it is difficult to justify DSP costs.

Another member (IL) queried if the Change Board can challenge why the DSP is being used, as it is very expensive. The Chair advised the Change Board can challenge it if they believe there is no business case. The member noted that Parties believe the wrong resources are being used. They added that there appears to be a disconnect between what is being used to make the change and what Parties think is needed to make the change. They queried if a quote can be received from another resource. The DCC (DW) advised that only the DSP team can work on the DSP system. They advised that each system has a Service Provider associated with it. They noted that it might not be the most efficient use of resources, but that organisation has to do the work on that system. They advised that the cost is based on the number of employees they will use and the number at each phase of the process. They advised that it is broken down, so people of the appropriate skill level are working on each phase.

A member (SA) advised they do not want to delay MP246. However, they queried if the current privacy risks will still exist until MP246 is implemented. Another member (AH) agreed and noted that there was a security risk before that was so minimal that Parties accepted it. However, they queried if this risk should be presented to the Privacy Sub-Committee (PSC) to ask if this risk is worth spending £25,000 on. The Chair noted this, but advised MP246 was raised and progressed before the PSC was set up. They noted that the SEC Panel wishes to progress MP246. A member (EL) stated that the Change Board should consider MP246 from a privacy perspective, and asked how this can be taken forward to develop a solution. They advised the Change Board must enable the benefit of smart and the ability to obtain and run data as a result of this.

The Proposer acknowledged the comments raised and advised that MP246 would have gone to the PSC if it had been set up when the modification was raised. They advised that if this is used by a Supplier then it will be considered a privacy issue. They also agreed with concerns raised regarding the cost. The Chair agreed with the concerns raised, but advised the DSP is the only one who can provide this service.

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

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

The Change Board unanimously believed that MP246 will better facilitate SEC Objective (f)¹ for the reasons given in the Modification Report Consultation responses. However, the Change Board highlighted their concerns regarding the cost associated with MP246.

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 10 July 2024**. If no referrals are received, the decision will be final.

MP230 'Review the SLA for delivery and completion for SMETS1 firmware'

The Change Board was invited to perform the final vote on [MP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#).

The member (DR) asked what number of Smart Metering Equipment Technical Specifications (SMETS) 1 Devices have exceeded the size limit. SECAS (MS) advised that as of March 2024, 670,000 SMETS1 Devices have exceeded the size limit. The member also asked if it has ever been necessary to upgrade those assets in the past or is this likely to occur in the future. Another member (EL) added that the issue is not the overall number but how much each Supplier has within their portfolio. Since their enrolment, the member advised that these Devices have had two firmware upgrades and there is a third due to take place. They stated the DCC are managing the flow of these taking place as they cannot handle the volume coming through their system in one go.

The member (DR) queried if this will apply across all three SMETS 1 Service Providers. The DCC (DW) advised that although the modification does apply to all SMETS1 Devices, only one manufacturer currently develops firmware of the size to be affected.

¹ Ensure the protection of data and the security of data and systems in the operation of the SEC.

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

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

The Change Board unanimously believed that MP230 will better facilitate SEC Objective (b)² for the reasons given in the Modification Report Consultation responses.

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 10 July 2024**. If no referrals are received, the decision will be final.

MP224 'SEC Performance Assurance Framework'

The Change Board was invited to perform the final vote on [MP224 'SEC Performance Assurance Framework'](#).

The member (AH) advised they were supportive of MP224, but noted concern regarding what the actual framework will cover. They queried some of the examples provided within the Modification Report. They noted that Suppliers keeping firmware up to date is covered by the Supply Licence, and that keeping Communications Hubs compliant is covered under the DCC Licence as opposed to under the SEC. They queried if the SEC PAF covers enough benefit to justify the cost of £185,000 per annum. SECAS (KD) noted this, and advised this cost will cover the setup of the PAF per annum and the first year of its operation. The specific risks being addressed and how they would be managed would be determined by the Performance Assurance Board. The Proposer (EL) noted the concerns and agreed there are some challenges. They noted that the focus is on improving performance, not on penalising Parties. They explained that at present there is no function, except the Performance Measurement Report (PMR) for DCC, for monitoring performance. Issues are currently noted at the SEC Panel but there is no proactive drive to improve issues. The member noted this, and advised they did not want to see a Performance Assurance Board (PAB) set up only because other Codes have one. They noted a SEC PAB would be beneficial, but highlighted the SEC is a technical code and sometimes difficult to understand. They agreed that if service to customers is impacted by another Party, there should be a process in place to address this. The Proposer advised the aim of MP224 is to better facilitate the smart end-to-end implementation programme, as there are many issues within it. As an example, they advised that Suppliers are obliged by their Licence to keep

² 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.

firmware up to date. However, they noted if there are issues with the latest firmware then it would be more appropriate to continue with the most appropriate firmware. They stated it will be beneficial to have a dedicated forum monitoring this kind of thing to ensure the correct measures are in place.

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

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	-	-	-	-
Overall conclusion:				Approve

The Change Board unanimously believed that MP224 will better facilitate SEC Objectives (a)³ and (g)⁴ for the reasons given in the Modification Report Consultation responses.

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 the Authority for final decision. SECAS will notify the Change Board when Ofgem returns with their decision.

MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'

The Change Board was invited to perform the final vote on [MP239 'Enduring Solution for Resolving SMETS2 Device Certificate Misalignment Issue'](#).

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	7	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

³ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

⁴ Facilitate the efficient and transparent administration and implementation of this Code.

The Change Board unanimously believed that MP239 will better facilitate SEC Objective (a) for the reasons given in the Modification Report Consultation responses.

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 10 July 2024**. If no referrals are received, the decision will be final.

MP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'

The Change Board was invited to perform the final vote on [MP262 'Extending the Installation End Date for CHTS v1.0 and GBCS v1.1'](#).

The member (EJ) advised they had initially responded to the Modification Report Consultation advising MP262 should be approved, but they now have more concerns about the non-communications implications of this. They advised they have a number of smart meters that cannot be returned, and understand the issue, but raised concerns regarding prepayment meters. They suggested that the non-communicating smart meters is a bigger risk than the stranded stock. They expressed concern that if the Technical Specification Applicability Tables (TSATs) are extended then there's a risk that older smart meters will be redistributed which could have negative impacts across the industry. They stated that the kit must be upgraded by the DCC before installation, and not after. They noted that they had hoped [MP252 'Amending the process for Communications Hub returns'](#) would help with this issue. The Chair advised MP252 is still in progress. The Proposer acknowledged the comments raised but highlighted that Suppliers are not able to return Communications Hubs to the DCC. They advised the Security Sub-Committee (SSC) raised no concerns with the installation of these Communications Hubs once they are upgraded immediately after installation.

The TABASC Chair (JH) stated that there is nothing preventing the Communications Hubs from being installed, but it does not contribute to the roll out targets. They advised that TABASC does not agree the TSAT should be extended. They added that TABASC does not want these Devices to go on the wall and stay at the same level of firmware, noting the importance of them being upgraded. They advised the only solution to ensure that is to leave the TSAT in its current state. They advised if a Supplier has a large number of these Communications Hubs, they can raise this with Ofgem to consider whether they should count towards rollout targets if immediately upgraded. From a TABASC perspective, they advised that the only reason MP262 was raised was to allow them to count towards Suppliers' roll out targets, not to confirm they can be installed. The Proposer noted this, but advised this perspective does not provide a practical solution. They advised that although the backlog was reduced during the previous three-month extension there are still a large number which have not been installed, and Suppliers now face penalties. They advised it is challenging to get Communications Hubs on the wall as many customers are reluctant to have them, and they want to prioritise the installation of these. The TABASC Chair asked if the Proposer has discussed this with Ofgem. The Proposer advised they have not, but advised they think extending the end dates is an easy solution as it has been done before. The TABASC Chair advised they also had concerns regarding the rate these are being installed, as they will not be achieved within the two years the Proposer is requesting. The

Proposer advised this is achievable, as they managed to install 80,000 during the three-month extension, and there are only 120,000 left to install.

A member (EL) advised that even if the Communications Hubs can be upgraded, there is still the issue of the returns process. They also noted the upgrade is a DCC responsibility and queried if this is being monitored. They advised that fitting Communications Hubs and ensuring they are upgraded to a compliant version is outside the control of Suppliers. The Chair advised they are unsure if this is reported to Ofgem, but they will investigate further.

Another member (EJ) asked if the Communications Hubs count towards the roll out targets if they are upgraded, noting the importance of achieving the roll out targets. Ofgem (GR) advised they were unsure but would investigate further. A member (EL) expressed confusion and asked if there is something actively removing them from the roll out target. The Chair advised that SECAS would take an action to investigate this issue further and report back to the Change Board. However, they suggested the members assume they are not counted towards the roll out targets until SECAS investigate this further. The Proposer advised that they assumed once the Communications Hubs were upgraded, they would count, so would not like to assume they would not count.

The TABASC Chair advised if MP262 is approved, the TSAT becomes worthless as it will continue to be extended and not drive the intended behaviour.

A member (JM) advised they had assumed the end of the Installation Validity Period (IVP) would lead to the removal of entries from the Certified Product List (CPL), and they can still be upgraded, but they would not have a valid CPL entry to pre-notify them. They suggested the TABASC might be able to explore further options, but there is no mechanism in the SEC to investigate this.

The Proposer stated when the previous extension was made, a question went out to industry to ask if it was sufficient but with hindsight, it can be seen that the extension was not long enough. They advised that scrapping the remaining Communications Hubs would have large financial and environmental impacts. A member (EL) advised that no one suggested scrapping the Devices. The Proposer advised if the Devices cannot be used, they will be returned and scrapped. The member asked if it is being stated that the Communications Hubs cannot be used. Another member (JM) advised there was a previous modification to reflash them. The Chair added that [MP155 'Communications Hub Re-Flash'](#) did not go ahead as it was very expensive. A member (DR) stated that it is not being said that they cannot be fitted; it is being said that the issue is unclear. The Proposer stated that if they cannot be returned, and then reflashed and reused, it is assumed they would be scrapped. However, they advised that there is currently no returns process in place. The Chair advised there is a returns process in place, but some Suppliers cannot return in bulk. They stated there was a modification raised to bring in an SRV to enable bulk returns, but it did not progress as some Suppliers could already do this. The Proposer stated that they were advised by the DCC that bulk returns cannot be done.

The member (KC) observed that the main issue seems to be whether these Devices will count towards roll out targets once they have been upgraded. However, they added there does not appear to be enough information to confirm this. Another member (DR) agreed. A member (EJ) advised it depends if the Change Board is voting on a worst-case scenario. If it is worst case, they suggested the Change Board should vote. They advised they do not believe more information is needed, but added would agree to wait if others needed more information. A member (PCS) stated it does not seem to be something the Change Board can vote on when the fundamental assumption is unclear. Another member (AH) asked what would happen if the Change Board vote resulted in MP262 being rejected. The Chair advised that MP262 is a Self-Governance modification, so a rejection by the

Change Board would be final. However, if someone disagreed with the Change Board decision, they can appeal it to the Change Sub-Committee (CSC).

A member (CB) advised that if the Devices can be installed and upgraded, and will count towards roll out targets, Suppliers are still at risk if they are not in control of the upgrades. The Chair agreed, and advised the DCC are responsible for carrying out the upgrade. The member (EL) advises that this aligns with their previous query. They stated that Suppliers should be fitting smart meters and having an open discussion with Ofgem about it. They advised MP262 raises a larger issue than simply changing the dates.

The Change Board agreed to defer their vote until more information is provided. The Chair advised MP262 will be taken back to the Change Sub-Committee (CSC) and find out from Ofgem if once a Communications Hub is upgraded does that count towards the roll out targets within a short period of time. They advised that SECAS will aim to bring MP262 to the next CSC meeting on 16 July 2024.

The Change Board:

- **DEFERRED** the vote until more information can be provided.

ACTION 91/01: SECAS to investigate if Communications Hubs will count towards Supplier roll out targets if they are upgraded to a compliant version.

MP219 'Accessing Consumption Data on behalf of SEC Parties'

The Change Board was not quorate to perform the final vote on [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#). An ad hoc Change Board meeting has been arranged for 2 July 2024 to discuss MP219 and perform the final vote.

MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

The Change Board was not quorate to perform the final vote on [MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#). An ad hoc Change Board meeting has been arranged for 2 July 2024 to discuss MP207 and perform the final vote.

4. SEC Modification Timetable

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

No comments were received from the Change Board.

The Change Board:

- **NOTED** the update

5. SEC Releases Costs Update

The Chair gave the Change Board an update on the SEC Releases Costs discussions that have been taking place at recent CSC meetings.

The DCC (DW) advised that the test heat map is an artifact produced by the CGI System Integrator, and it identifies areas that may require regression testing that is not covered within the Impact Assessment.

For the November 2021 SEC Release, the member (JDA) asked if there was £18 million worth of regression testing carried out. The Chair advised that [SECMP0007 'Firmware updates to IHDs and PPMIDs'](#) was also included in that SEC Release.

A member (DR) queried if regression testing is automated or manual. The DCC (DW) advised that a lot of the regression testing from the non-DSP Service Provider is manual, and mainly involves Device testing from other Service Providers.

The member (KC) stated this is another cost that is being added to modifications. Based on the previous discussions, they advised this might be another issue that prevents innovation. The Chair advised that this was presented to the CSC a few months ago, and the CSC were concerned around how the Change Board can approve modifications if these costs are added after approval. They advised they are working with the DCC, SEC Panel Chair and Ofgem and the Department for Energy Security and Net Zero on this issue.

The Change Board:

- **NOTED** the update

6. Any other business

SECAS (RB) advised that the Annual SEC Party Engagement Day will take place on 17 July 2024, and if they are interested in attending to email secas@gemserv.com. A member (AH) advised they attend last year's SEC Party Engagement Day and found it very beneficial.

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

Next scheduled meeting date: 24 July 2024