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SEC Change Board Meeting 91x

2 July 2024, 14:00 – 14:50

Teleconference

SECCB_91x_0207 – Final Minutes

Attendees:

Representing	Change Board Members	Organisation
Change Board Chair	Ali Beard	Change Board Chair
Large Suppliers	Alex Hurcombe (AH)	EDF
	Emslie Law (EL)	OVO
	Emma Johnson (EJ)	British Gas
	Kevin Clark (KC)	Utilita
	Sharon Armitage (SA)	E.ON
Small Suppliers	Daniel Davies (DD) (<i>Alternate</i>)	ESG Global
	Christie Thomson (CT)	SSE
Network Parties	Jacqueline D'Angelo (JDA)	UK Power Networks
	Kelly Kinsman (KK) (<i>Alternate</i>)	National Grid Electricity Distribution
Other SEC Parties	Ian Lovatt (IL)	Chameleon Technology
	Nick Winfield (NW)	Landis+Gyr
	Patrick Caiger-Smith (PCS)	GEO Together
Consumers	Colin Griffiths (CG)	Citizens Advice

Other Participants		
DCC		
Bradley Baker (BB)	David Walsh (DW)	
SMS		

Matt Roderick (MR)		
Ofgem		
Grace Royall (GR)		
SECAS		
Rachel Black (RB) (Meeting Secretary)	Ben Giblin (BG)	Kev Duddy (KD)
Liz Woods (EW)		

Apologies:

Representing	Change Board Members	Organisation
Consumers	Faye Brooke Lewis	Citizens Advice
Large Suppliers	David Rodger	Scottish Power
	Joey Manners	Octopus Energy
Small Suppliers	Carolyn Burns	ESG Global
	Gareth Evans	Waters Wye
Network Parties	Rachael Prosser	National Grid Electricity Distribution

1. Change Board Votes

MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'

The Change Board was invited to perform the final vote on [MP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#).

The member (JDA) asked which SEC Party raised MP207. SECAS (EW) advised it was raised by Smart Metering Systems (SMS), that is a Registered Supplier Agent (RSA). Citizens Advice (CG) noted that it is difficult to justify the costs associated with MP207 as it was not raised by a Supplier, who would be most impacted by this.

SMS (MR) asked how many Suppliers in attendance at the meeting agreed that firmware management within the energy industry relating to Smart Metering Equipment Technical Specifications (SMETS) effectively supports consumers in using data from their smart meters. A member (EL) advised this is not the issue MP207 is addressing. SMS advised that MP207 is aiming to improve this situation. They advised that based on the Proposers research, there are firmware issues in the industry that need to be addressed. They highlighted that finding the correct firmware and deploying it is not being carried out in a timely manner. They advised that this would provide an alternative solution to maintaining the affected smart meters. A member (JDA) acknowledged this, but advised their issue is that MP207 has not been raised by a Supplier, which indicates that Suppliers do not think this is a problem. SMS advised that they have been contacted by a consumer who has been advised by their Supplier that they will not be providing updates as Suppliers do not need half hourly data, meaning the consumer will not have the data. SMS advised this is a licence issue, but there is no enforcement in this area. A member (EL) expressed confusion regarding how firmware would resolve the issue of provision of data. SMS advised that the early Honeywell smart meters had issues with providing half hourly data. The member suggested this would be an issue for Other Users. SMS

advised that it is the responsibility of the Supplier to keep their smart meters updated to the most appropriate firmware and share data with Other Users. The member advised this is not included under SMETS. SMS advised that it is included under the Supplier Licence. The member noted this, but queried where this was included under SMETS, as there is no section that states this is a Supplier issue that requires the involvement of a third party.

SMS (MR) stated that, based on research by SMS, 35% of smart meters require corrective action in the form of a firmware update. They also advised that 18% could be improved by messages across the network. They advised the aim of MP207 is to make it easier for Suppliers to maintain their smart meters. A member (IL) noted the comments made, and stated they had come across situations where updating meter software has been identified as a reason or fixing defects of Prepayment Interface Device (PPMID) displays or provision of data. However, they also agreed with the points raised by the Change Board member (EL). They observed that the last time MP207 was presented to the Change Board, it was sent back as the members stated it was not clear how the outcome would be achieved, as it was only queueing up firmware versions to be downloaded. They advised that if that circle could be closed, it could explain why MP207 would be beneficial, as it still appears to need interaction from Small Suppliers. SMS noted this and advised that there are nearly 1,000 firmware versions within the Certified Product List (CPL). They advised that some smart meters have thirty to forty different firmware options available. They explained that MP207 will mean that Suppliers will not have to be concerned about this issue, as the RSA will work on the issue. They advised the RSA will assess the portfolio and determine what the most appropriate firmware is for the Device and will present this to the Supplier who chooses to engage in the process. As it is a critical command firmware activation, SMS advised that the final authority to activate the firmware must come from the Supplier. They advised they envisioned that being done by the Supplier on the basis of the RSA's recommendation. A member (SA) noted this, but advised the obligation is still on Suppliers, as stated in the Licence Condition and the SEC. They advised that the way this is being presented to the Change Board is that it is being selected on the Supplier's behalf, which is incorrect. They highlighted that the obligation is still on the Supplier. SMS (MR) agreed and stated that the obligation of installing is on the Supplier, but they contract meter installers to do this on their behalf. They explained that accountability is still on the Supplier, but they employ a third party to perform the installation function.

A member (DD) accepted the comments made by SMS that some Small Suppliers firmware is a big issue and is difficult to navigate. However, they disagreed that MP207 would resolve the issue. They stated that the removal of Great Britain Companion Specification (GBCS) does not prevent the Supplier from having to do anything. They advised the Supplier still needs to sign the image and change systems to activate the firmware. The member stated that the only way MP207 would be beneficial is if it could offset all of these things. The member (CT) advised that MP207 does not address the problem, and it is still very complex.

A member (JDA) advised they would have been more comfortable with MP207 had it been raised by a Supplier. They also noted that not all Suppliers were supportive of MP207 based on the Modification Report Consultation (MRC) responses.

A member (IL) advised they recognise the issue and support the intent, but advised they do not believe it will be effective. Therefore, they abstained from the vote. The member (PCS) advised that they are normally supportive of something that aims to open up services to other parties. However, they advised that the costs cannot be justified if Suppliers are not interested in using it.

A member (EJ) advised they were more supportive of MP207 when it was assumed it would be able to upload and activate. However, based on the current information, they advised they they could not support it. A member (AH) agreed with this, and advised they do not believe the overall cost to

industry will be beneficial and noted that no Suppliers have come forward to say they would use this. However, the member (KC) advised they would vote to approve, as they believed it better facilitates SEC Objectives (a)¹, (c)² and (e)³.

Citizens Advice (CG) advised they would abstain. However, they noted that there does not appear to be any support from Suppliers for MP207.

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

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

The view of the majority of the Change Board is that MP207 will not better facilitate SEC Objective (a) for the reasons given in the Modification Report Consultation responses. The majority of the Change Board voted to reject MP207 due to the high costs associated, lack of support from Suppliers, and ineffectiveness of the solution.

The Change Board:

- **AGREED** that this Modification Proposal should proceed to vote
- **AGREED** to recommend this Modification Proposal to the Authority to be rejected
- **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 their decision.

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'](#).

In relation to the four consultation responses advising MP219 should be rejected, the Proposer (MR) advised that increases in network traffic as occur for a variety of reasons which do not relate solely to this modification. They used [DP218 'Review of the SEC Charging Methodology'](#) as an example. In response to a respondent stating that the Privacy Control Framework (PCF) changes make MP219 unworkable for them as a Supplier, the Proposer advised that the Supplier does not need to use this route if it is not workable for them. They added that the respondent could consider raising a

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

³ Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

modification to make MP219 workable for them if they wanted an Other User to collect Consumption Data on their behalf.

In relation to the network traffic issues, a member (PCS) questioned whether the data being collected by the Other User would be considered as low priority in terms of network traffic across the DCC System. The Proposer (MR) advised that this information should be given the same priority to data currently being collected by Suppliers for purposes of the Demand Flexibility Scheme. They stated that before the Demand Flexibility Scheme begins, data is collected for three weeks prior to the start date to ensure functions are working correctly before the go-live event. They added that this trial is likely to have a higher priority to ensure it achieves the outcomes during the event. The Change Board member (PCS) advised they have voted on mechanisms regarding the priority of messages. They advised it is important to highlight that the prioritisation of Service Requests may change between before and during the Demand Flexibility Scheme.

Citizens Advice (CG) advised that they have been involved with the development of MP219 and that their main concern had been regarding consumer consent. They advised this concern has now been addressed after changes SECAS had developed to the PCF, such as the consumers ability to opt out of an Other User collecting their data. SECAS (BG) advised that Ofgem had sent this modification back to SECAS for further investigation to take place. They added that one action was that SECAS work with Citizens Advice and develop the full changes to the Privacy Controls Framework. In addition, SECAS also presented the modification and associated changes to the Privacy Sub-Committee (PSC) who agreed on the level of assurance needed from the Independent Privacy Auditor if this modification is approved. They advised that Citizens Advice were present at the PSC meeting and were happy with the level of assurance provided. Citizens Advice (CG) agreed with this and added that Citizens Advice were happy with the modification and associated controls.

A member (AH) disagreed that MP219 better facilitates SEC Objective (f)⁴ as the modification would only be used if a Supplier intended to employ an Other User to collect Consumption Data on their behalf. The Proposer stated that it does better facilitate SEC Objective (f) as it provides clarity and simplification of the consent process. They explained that if you give consent to the Supplier to use your data for the Demand Flexibility Service (DFS), then this process does not have to be repeated with the Other User also having to collect the Unambiguous Consent of each Energy Consumer. The member noted this, but advised they do not agree that simplification ensures better protection of data. They advised the focus is ensuring the permissions are in place for when the data is taken.

The member (EJ) advised that they are also a member of the PSC. They advised that when the proposed changes to the PCF were presented to the PSC there were a number of options discussed to decide the level of assurance. They added the requirement of an opt out was decided on before MP219 was brought before the PSC. They advised they are still confused regarding why there needs to be an opt out option. They stated that there is wording in SEC Section I where Other Users can only collect this data if it is specifically requested by a Supplier and both the Supplier and Other User are responsible for the actions and who has accountability. They added that this makes it unworkable for that they would like to use it for. SECAS (BG) noted this, but advised it was made clear from the meetings with Citizens Advice that this had to be included before being brought to the PSC, as it would have received a lot of negative feedback without it.

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

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	4	1	0	Approve

⁴ Ensure the protection of Data and the security of Data and Systems in the operation of this Code.

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

The view of the majority of the Change Board is that MP219 will better facilitate SEC Objectives (a), (c)⁵ and (f) for the reasons given in the Modification Report Consultation responses. However, the member who voted to reject (KC) advised they do not believe the controls are in the correct place, and it brings too much risk to data privacy and security.

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 their decision.

2. Any other business

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

Next scheduled meeting date: 24 July 2024

⁵ 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.