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SEC Change Board Meeting 94

25 September 2024, 10:00 – 12:30

Teleconference

SECCB_94_2509 – 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	Carolyn Burns (CB)	ESG Global
	Gareth Evans (GE)	Waters Wye
	Christie Thomson (CT)	SSE
Network Parties	Jacqueline D'Angelo (JDA)	UK Power Networks
	Rachael Prosser (RP)	National Grid Electricity Distribution
	Tom Stuart (TS)	WW Utilities
Other SEC Parties	Ian Lovatt (IL)	Chameleon Technology
	Nick Winfield (NW)	Landis+Gyr
Consumers	Faye Brookes-Lewis	Citizens Advice

Other Participants		
DCC		
Robin Seaby (RS) *(Proposer of MP241)*	Bradley Baker (BB) *(Proposer of MP270)*	Pete McEnerney (PMcE)
Charlotte Semp (CS) *(Part Meeting – MP268 Discussion)*		
Ofgem		
Ian Chalfon (IC)	Cristina Ullastre (CU)	
SECAS		
Rachel Black (RB) (Meeting Secretary)	Ben Giblin (BG)	Georgie Severin (GS)

Apologies:

Representing	Change Board Members	Organisation
Other SEC Parties	Patrick Caiger-Smith	GEO Together

1. Approval of Previous Meeting Minutes

The Meeting Secretary (RB) informed the Change Board that comments had been received on the previous meeting minutes. The Change Board **APPROVED** the minutes as final.

2. SEC Releases costs update

The DCC (PMcE) provided the Change Board with an update on the SEC Releases costs.

The member (JM) queried what these SEC Releases would have generated in DCC annual operating costs. The DCC (PMcE) advised they did not have these figures but will return to the Change Board with this information. The member asked if the figures shown were comparable with historic SEC Releases. The DCC advised the figure fluctuates, but most costs would be similar to that of the November 2023 SEC Release and November 2024 SEC Release. They highlighted that the June 2024 SEC Release is an outlier, but the main cause of the large costs here was because of Market Wide Half Hourly Settlements (MHHS). The Chair agreed and confirmed that most SEC Releases cost approximately £3 - £4 million.

Another member (SA) asked which column on the table shown is the Change Board and Change Sub-Committee (CSC) made aware of to enable them to make decisions. The DCC (PMcE) advised that this is the first column of figures. They explained that the November 2023 SEC Release had one SEC Modification and the first column with the figure £1.2 million was the cost of delivering the Impact Assessment, which would have been presented to the CSC. The Chair clarified that the CSC are not made aware of the costs leading up to the delivery. They explained that when the CSC are presented with the decision of the go-live of a SEC Release, they are only aware of what the Operations Group (OPSG) and Testing Advisory Group (TAG) have agreed.

The member (AH) asked if SECAS have carried out work on previous modifications that have been implemented to see if there have been benefits associated with them. They referred to SECMP0007

'Firmware updates to IHDs and PPMIDs' as an example, which they noted was very expensive, and queried what benefits have come from its implementation. They suggested SECAS carry out a review a year after a modification has been implemented to see how often the operation is used. They noted that modifications that required a DCC User Interface Specification (DUIS) change may not be used by many Parties, and the DCC have their own internal costs to measure against this. The Chair noted this, and stated they are drafting a project plan for introducing a benefits realisation process to review the outcomes of previous SEC Releases. They advised this is expected to be presented to the SEC Panel in October.

The member (EJ) noted that it was discussed previously whether to postpone SECMP0028 'Prioritising System Messages' to a later SEC Release to avoid large costs. However, it was decided to still include it in the November 2024 SEC Release as planned, as the DCC will be able to reduce the costs. They queried if what was shown on the table are the reduced costs. The DCC (PMcE) advised that they have an action to return to the CSC with information relating to this. They advised the figures shown are the reduced costs, as the DCC was able to remove £300,000 associated with post Pre-Integration Testing (PIT) costs. They advised this cost is lower than previous SEC Releases, and that the DCC aims to continue to reduce the costs going forward. They stated they are working on a plan and will make proposals to TAG that should assist in reducing costs.

The Chair noted that testing has not been reviewed previously, but the DCC will endeavour to investigate what needs to be tested and discuss with the Technical Architecture and Business Architecture Sub Committee (TABASC) and TAG what is appropriate going forward. The DCC (PMcE) agreed, and advised that the DCC, TABASC and TAG have taken a risk adverse approach to testing, and costs had not been considered. However, they advised they will work to ensure that testing is appropriate to a Release going forward and that this may reduce costs.

Another member (EL) raised concerns regarding where the additional costs have been signed off and queried if this is signed off internally by the DCC. The DCC (PMcE) stated that going forward, when an Impact Assessment is presented to the Change Board, there will be an estimated cost included to give more transparency. The DCC advised that changes within the DCC also need to be considered, and that the DCC Board is responsible for signing off business cases internally. The member advised that Large Suppliers did not sign off on the £2.7 million associated with the November 2024 SEC Release. They noted that non-SEC Modification costs have not been discussed, and they will return to the Change Board with an update on what can be done in relation to this. A member (AH) also expressed concerns regarding the cost and transparency provided. They questioned if the DCC and their Service Providers are managing their costs, based on the disparities of what Change Board sign off on and what ends up being included in the SEC Releases. The Chair acknowledged the concerns raised and advised that the DCC will work on this issue, and input from the Change Board will be greatly appreciated.

A member (SA) asked if the cost that will be presented to the Change Board going forward will be the total cost of delivery. The Chair advised that the Change Board will be presented with the cost of the Impact Assessment plus an estimated cost of testing from the DCC. The DCC (PMcE) agreed, and emphasised it will be an estimated cost only, as it could vary depending on what other SEC Modifications are also included in the SEC Release the modification is scheduled for.

The Change Board

- **NOTED** the update

3. Change Board Votes

MP241 'Interoperability Checker Update'

The Change Board was invited to perform the final vote on MP241 'Interoperability Checker Update'.

. The summary included the point that media coverage implies that consumers can check if their smart meter is working rather than the original intention of the Interoperability Checker which was to enable a consumer with a SMETS1 meter to understand if it would continue working if they changed Supplier. A member (EJ) asked if the media coverage is unhelpful, and if anything has been done to dissuade this. The Proposer (RS) advised that it is not something the DCC actively promotes and is not discussed by Citizens Advice. They noted that it is understood by consumers to be a Smart Meter Checker which is available on the Citizens Advice website. Citizens Advice (FBL) advised that they do not mislead consumers, but the media have a negative impact on this. They advised that they have feedback on what functionality consumers would like available on the Interoperability Checker, and Citizens Advice hope this can be delivered soon.

The member (AH) questioned what use case MP241 is aiming for. They noted that it was originally designed for Smart Metering Equipment Technical Specifications (SMETS) 1 to understand if they can upgrade to SMETS2, and to check with the DCC to ensure they will still have coverage. The Proposer disagreed, and advised the tool was originally set up to allow consumers to check if their SMETS1 is enrolled in the DCC, and if so, would the Energy Supplier likely be able to operate it in Smart Mode. They advised the issue is that it is based on the Device Model consumers have, and if it is enrolled into the DCC. The Chair added that it was originally set up to determine if a SMETS1 could be transferred to another Supplier. They noted that it is now being used to identify where Smart Meters are not communicating. The Proposer advised that if the consumer has an enrolled SMETS1 they can see if their Supplier will be able to operate in Smart Mode, and which Suppliers can operate in Smart Mode via the DCC. However, consumers also want to understand if their Smart Meter is receiving communication and who they can switch to. They advised that this is also true of SMETS2 users. The member noted this, and advised they are trying to understand what the future use of the Interoperability Checker will be and noted that there is no longer a requirement for 4G data. They stated that when 4G is rolled out, consumers will be inquiring as to whether their SMETS2 can support 4G, but Suppliers will have to say it will not have this ability. The Proposer noted this and advised that consumers will also want to understand the percentage of their neighbours who have this to understand whether their premise is able to support 4G. However, they decided to remove this section of MP241 and pursue this as part of a separate SEC Modification, so as not to hold up the main purpose of this modification – an enhanced Interoperability Service Checker.

A member (EL) queried the view of Operations Group (OPSG) that policy data provided by Suppliers should be up to date. The Proposer advised that this refers to the way data is currently input into the Interoperability Checker. They advised there is an issue of keeping the data up to date, but do not believe this problem will be resolved. They advised the policy data is not specific to a consumer's Smart Meter, and traffic to and from the meter is not being considered when determining a Smart Meter's operability at the moment. The Proposer advised that the issue MP241 is focused on is that it does not inform consumers if their Smart Meter is receiving communications from Suppliers. However, this functionality will be provided going forward as the DCC can refer to service audit trails (SATs). The member highlighted that there is a difference between what the DCC and Suppliers define as non-communicating. The Proposer noted that this was discussed at Working Group. They advised that the DCC will input the new report into the Interoperability Checker and is a work in progress. The member advised that the definition of non-communicating will be worked on for some time, as there are discrepancies in what is defined as non-communicating. The Proposer agreed with this, but the

DCC are proposing a list of Service Requests to understand if a Smart Meter is operating in Smart Mode, and as that work progresses it will improve. The Chair asked how many non-communicating Smart Meters there are. The member advised there are 3.5 million non-communicating Smart Meters, and it includes non-enrolled SMETS1 Devices. They expressed concern that consumers will use this to see if their Smart Meter is communicating and it will be incorrect. The Proposer noted that the Interoperability Checker is used tens of thousands of times each month. The Chair commented that only a percentage of them will receive incorrect information. The member highlighted this will have a negative impact on Suppliers and advised it would not be beneficial to implement MP241 before the correct information can be provided. A member (IL) queried if providing extra information on the Interoperability Checker would be better for the consumer than it remaining in its current system. The Proposer advised this would be beneficial.

Another member (KC) disagreed that it would be beneficial, as the information would still be incorrect. The Proposer advised the information would not be incorrect; it would be derived from a SAT that shows Service Requests. They stated that the member (EL) referred to is the definition of what a non-communicating Smart Meter is, and which Service Requests constitute a non-communicating Smart Meter. They advised they would expect most results to say that the Smart Meter is communicating because they can see traffic between the Smart Meter and the Supplier. The member (KC) highlighted that blank responses would still be considered as communicating and queried if the best route is to advise consumers to contact their Supplier directly. The Proposer advised that consumers who use the Interoperability Checker have already contacted their Supplier or have reasons for not going directly to their Supplier. Citizens Advice stated that they would encourage consumers to contact their Supplier, but some receive conflicting information or cannot get the answers they seek. They advised that the Interoperability Checker acts as an extra step to give them clarity, so they have more information when they speak to their Supplier. The member noted this, but expressed concern that consumers might be given more misleading information which will add confusion to their situation.

The member (JM) asked how many of the users of the Interoperability Checker are individual people using it once, or people using it multiple times. Citizens Advice (FBL) confirmed it is individual people using it once, as they count people who use it repeatedly as one user. They stated that approximately 45,000 people use it every month, and it is the third most visited web page on their website.

In relation to gas, the member (DR) asked what Device is being referred to, as Gas Proxy Function (GPF) is not considered a Smart and uses two systems. They advised that neither system will inform a consumer if their Gas Meter is working accordingly. Another member (EL) added that an In-Home Display (IHD) may also not be working accordingly. The Proposer noted that a non-functioning IHD is something that can cause confusion for consumers.

A member (IL) noted that while this is a good tool for consumers to access data, there are still some issues that need to be addressed. They questioned if the implementation of MP241 could be paused while work continues to ensure the information on the Interoperability Checker is accurate. The Chair advised that the Change Board can choose to defer their vote on MP241 if they feel that more work needs to be done before it can be voted on. Another member (EL) agreed, and advised that they are supportive of MP241, but highlighted that there are discrepancies that need to be addressed that MP241 relies on. They noted that the aim of MP241 is to provide more information to consumers, but it must be ensured that the information is accurate before MP241 can be approved. They observed that if MP241 was approved now, it would have various clauses and caveats associated with it that would lead to more confusion.

The member (EJ) asked where the reports from the Smart Meter will be sent. The Proposer advised it is an internal DCC process, and these reports will be used to input information in the Interoperability Checker.

A member (AH) noted the low cost of implementing MP241. They queried if there will be other ongoing maintenance costs associated with it as a result of the daily and weekly reports. The Proposer advised these will be internal reports that will be created by the DCC Data Service and Analytics (DS&A) team, which is included in this cost. They advised there may be small ongoing costs to maintain the reports, which will be changed if needed. The Chair asked if it becomes an automated process once the reports are set up. The Proposer agreed and advised it will be run by the Cloud. Based on the discussions in Agenda Item 2, the member (KC) asked if this will be the total cost. The Proposer advised this is a total cost, as it does not go through the testing environment. The Chair agreed and added that it does not come under DCC Total Systems or the Data Service Provider (DSP). The Proposer advised that (DS&A have created a tool for the DCC to use which they manage via the Cloud.

A member (EL) asked if there will be personal data in the daily and weekly reports. The Proposer advised that the tool has undergone a data privacy Impact Assessment that the DCC can review, but they already have provisions to handle Meter Point Administration Number (MPAN) data, which is considered personal data. The member noted that the daily report on every MPAN would go across regardless of whether the owner is seeking information on their Smart Meter. They asked if this has been taken into consideration. The Proposer advised that the DCC already have this data set covering all SMETS1 Smart Meters, which has been exported into their reporting process. A member (KC) asked what information the consumer must provide to access the data. The Proposer advised they need to provide their MPAN and post code.

Another member (CB) asked what the original lifespan of the Interoperability Checker was. The Proposer advised that when it was written in the SEC, it had an open-ended life span which stated it was open until the Secretary of State advised otherwise. The original intent had been for it to align with SMETS1 migration, but this has changed overtime.

The Chair acknowledged the comments made throughout the discussion. They advised SECAS will carry out more work to address the concerns of the definition of non-communicating, and if they can wait for that work to align with MP241. They also advised that SECAS will investigate where GPF information comes from. The member (IL) noted that as it stands, the Interoperability Checker only aims to target the Smart Meter and queried if that is the intended scope. The Proposer agreed, and advised the DCC cannot tell the consumer if the IHD is working accordingly. However, they clarified that the concern was that consumers often mistake the IHD for the Smart Meter itself. The member noted this and agreed it would be beneficial for this to be delivered on a dashboard, as it does not seem feasible to deliver the check on the Home Area Network (HAN). Another member (EL) highlighted that it must be made clear that the use case is to provide the consumer with better information and not create further confusion for them.

The Change Board:

- **DEFERRED** the vote on MP241 until further information can be provided

ACTION 94/01: SECAS to see if MP241 can be aligned with the discussions of what is the definition of a non-communicating Smart Meter.

ACTION 94/02: SECAS to investigate where GPF information comes from, in relation to MP241

MP263 'Improving transparency of DCC indicative costs'

The Change Board was invited to perform the final vote on MP263 'Improving transparency of DCC indicative costs'.

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	**Approved**
Small Suppliers	3	0	0	**Approved**
Network Parties	3	0	0	**Approved**
Other SEC Parties	2	0	0	**Approved**
Consumers	1	0	0	**Approved**
			Overall conclusion:	**Approved**

The Change Board unanimously believed that MP263 will better facilitate SEC Objectives (b)[1] and (g)[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 relating to 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 9 October 2024.** If no referrals are received, the decision will be final.

MP270 'Enabling DCC to provide SMDA Test House services'

The Change Board was invited to perform the final vote on MP270 'Enabling DCC to provide SMDA Test House services'.

The member (JDA) asked if this will mean that the DCC will take on a level of responsibility for the testing of Smart Meters. SECAS (GS) advised they will only have responsibility if they are awarded the Smart Metering Device Assurance (SMDA) contract. The Chair added that the DCC will have to bid alongside other interested parties. They noted that the DCC have testing facilities and therefore have the ability to bid but highlighted that the SMDA Sub-Committee (SMDASC) will consider all interested parties equally. The Proposer (BB) advised that MP270 is a follow on from MP264 'Updating Independence of SMDA Testing Provisions', and that MP270 is to ensure that the DCC continue to be compliant with their licence if they were awarded the contract. The Chair agreed, and

[1] 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.
[2] Facilitate the efficient and transparent administration and implementation of this code.

advised MP264 was raised to allow Service Providers and any other SEC Parties to bid for the contract, as it was previously only open to parties who were independent of the SEC.

A member (EJ) asked if MP270 needs to be approved and implemented before the DCC bid for the SMDA contract. The Proposer advised this would be needed, as once the SMDA make their decision the new contract will be signed in November 2024. They stated that if the DCC are successful in their bid, these changes would need to be in place before they could sign the contract, which is why MP270 is to be implemented as part of the November 2024 SEC Release. They advised that this will still be useful even if the DCC are unsuccessful in their bid, as it will come into use if the DCC are awarded the contract in the future.

Two members (JM and NW) advised they would abstain from the vote, as they were both members of the SMDA Sub Committee.

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

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	1	1	**Approved**
Small Suppliers	3	0	0	**Approved**
Network Parties	3	0	0	**Approved**
Other SEC Parties	0	1	1	**Rejected**
Consumers	1	0	0	**Approved**
			Overall conclusion:	**Approved**

The majority of the Change Board believed that MP270 will better facilitate SEC Objective (d)[3] 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 relating to 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 9 October 2024.** If no referrals are received, the decision will be final.

4. Request for Impact Assessment

MP268 'Certificate rotation and expired Certificates'

The Change Board was presented with the DCC Impact Assessment request for MP268 'Certificate rotation and expired Certificates'.

Based on the previous discussions in Agenda Item 2, the member (SA) asked if the figures provided are accurate costing forecasts, or will they need to be changed based on the criteria going forward. The Chair advised that the members that the cost to carry out the Impact Assessment will remain unchanged and is not affected by what was discussed in Agenda Item 2. However, when it is

[3] Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

returned, it will be a figure of between £10,000 - £160,000. Along with this figure, the DCC will provide an estimated figure of the testing costs going forward.

The Change Board:

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

5. 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

6. MP271 proposed Legal Text changes

SECAS (BG) presented the Change Board with the proposed legal text included in MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents' and requested members provide feedback to feed into the Modification Report.

A member (IL) queried whether Other SEC Parties (OSPs) specify exactly what type of organisation they are (Manufacturers, MAPs etc.) when they accede to the SEC. They noted that SECAS detailed their organisation as merely a Manufacturer, however they are also an Other User. SECAS (BG) acknowledged this and advised that they plan to reach out to all current Other SEC Party representatives to check their categorisation was accurate before the Refinement Consultation.

Another member (EL) noted that the organisations in question are DCC User Roles and are not SEC Party roles. They advised this issue is further reaching than nominations for Sub Committees, and is separate to the SEC. The Chair noted this and advised that the Proposer believes that it is a very broad category that does not represent him as an Other SEC Party that is also a DCC User. The Chair noted that there are only seven Other SEC Parties who are also DCC Users. The member suggested that this was more of a commercial issue. They noted that more work will need to be done to avoid any unintended consequences that might inadvertently exclude Parties.

The member (CB) suggested the Proposer waits until a seat becomes available and then nominate themselves for that seat, as this would avoid the cost of raising a modification. SECAS (BG) noted this but advised that the Proposer had nominated themselves for SEC Panel and TABASC, but was not successful. They then raised MP271 to encourage representation for their category. They advised that the Proposer has received positive feedback on this from the Association of Independent Meter and Data Agents (AIMDA). The member queried changes being made to the CSC and OPSG outside the scope of MP271. SECAS advised that the membership of these groups can be altered via the Terms of Reference which sits outside of the SEC legal text. They added that the CSC and OPSG would be asked to provide a consensus view on the changes to the groups' Terms of Reference. If they agree to these changes, it will then be presented to the SEC Panel for final approval. They stated that the proposed Terms of Reference changes were presented to the CSC on 17 September, and they decided to defer their decision until the Modification was ready to wait and align with other Sub-Committees. They also noted that the OPSG rejected the proposed changes. The member asked if

SEC Panel has been included in the scope of the modification or proposed Terms of Reference changes. SECAS advised that no changes had been proposed to the SEC Panel by the Proposer.

A member (SA) asked if the TABASC provided feedback on the modification. SECAS (BG) advised that this has not been brought to TABASC yet but stated this will be brought to TABASC at their next meeting on 3 October 2024. The Chair highlighted that Sub-Committees may have differing views on the modification and Terms of Reference changes, noting they do not all need to be aligned in order for changes to take place. The member noted this but suggested that inclusion across Sub-Committees would be beneficial to ensure alignment and representation. The Chair noted that currently Sub-Committees have varying representation, some based on varying levels of technical expertise.

The member (EL) noted that AIMDA is a trade body of commercial entities that came about as part of MHHS and advised this will need to be considered from a SEC perspective. They queried what the role of these Parties will be on Sub-Committees, noting the differences of each Sub-Committee. The Chair advised this will be included in the MP271 Modification Report.

A member (KC) queried how comfortable the OSP representatives at Change Board were with representing the entire constituency. The member (IL) advised that they understand that they must represent the entire Other SEC Party category, and advised there has been lots of discussion on this in other forums. However, they noted that the Other SEC Party seats have not had to go to election on Change Board since 2021, which suggests there are no issues with a lack of representation. They noted it has been discussed at the Working Group that there should be wider engagement between representatives and their category that SECAS may be able to facilitate in the future. The Chair noted this, and advised SECAS have reached out to Other SEC Party representatives to ensure representation.

7. Change Board meeting dates 2025

SECAS (RB) requested that the Change Board note the 2025 Change Board meeting dates.

There were no comments, and the Change Board **NOTED** the 2025 meeting dates.

8. Any other business

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

Next scheduled meeting date: 23 October 2024