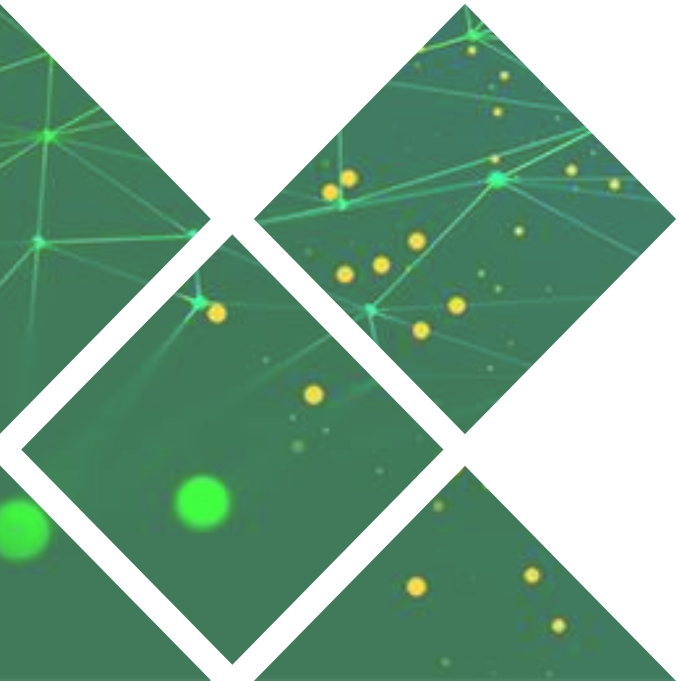


Change Board Meeting 94

25 September 2024



Competition Act Compliance

It is everyone's responsibility to say something

The Chair will move the conversation on



■ Change Board Terms of Reference

- The Change Board is the delegated Sub-Committee of Panel for voting on Modifications. The Change Board has power to:
 - consider each Modification Report and the Modification Report Consultation responses presented at the end of the Modifications Process. It will agree **whether the Modification Report is ready to be voted upon**, and if not **what further analysis or clarifications are required** before the Modification Report can be voted upon;
 - **perform the final vote** on approval or rejection of a Modification Proposal. For a Self-Governance Modification, the Change Board's vote shall form a decision, which is then subject to a 10 Working Day period in which Parties can refer this outcome to the SEC Panel before becoming final. For any other Modification Proposal, this vote shall form a recommendation to the Authority, who will make the final decision; and
 - **determine if the DCC Impact Assessment should be performed**, with the costs of that incurred by Parties. Where the Change Board believes this is not the case, it will need to state **what further work is required** before it will agree to request the DCC Impact Assessment.

■ Agenda

1. Approval of previous meeting minutes
2. SEC Releases costs update
3. Change Board votes
4. Impact Assessment request
5. SEC Modifications Timetables update
6. MP271 – proposed legal text changes
7. Change Board Meeting Dates 2025
8. AOB

Agenda Item 1

Approval of previous
meeting minutes
Rachel Black (SECAS)

■ Recommendations

- No comments were received from the previous meeting minutes
- **APPROVE** these minutes as final

Agenda Item 2

SEC Releases Costs update

Pete McEnerney (DCC)

The SEC Releases Costs update slides are classified as 'AMBER'
Please email sec.change@gemserv.com if you would like to access them.

Agenda Item 3

Change Board Votes

■ MP241 'Interoperability Checker Update'

Georgie Severin

Raised by Robin Seaby of the DCC

Self-Governance

LOW

■ MP241: Overview

- Currently, the interoperability Checker Service is generalised based on Device Models.

Issue



- This causes confusion on Smart Meter operability.

Impact



- SEC Section H 'DCC Services'
- Updating Supplier interoperability Data

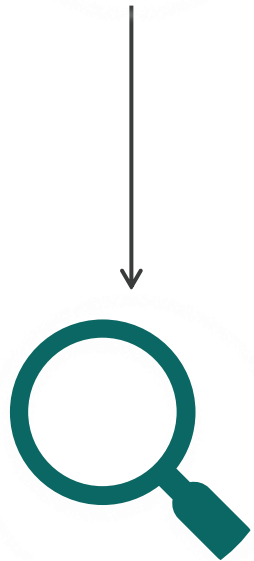
Proposed Solution



■ Concerns raised by Working Group



Does not guarantee
100% accurate
results



Enhances the
Interoperability
Checker to allow for
a more accurate
source of information



DCC SMWAN
element is not
required



Inclusion of 2G/3G
and 4G coverage data
will be available in
the DCC System Data
and will not add
complexity to the
solution

No longer a business
requirement



Use Case has
changed from an
Interoperability
Checker to a Smart
Meter Checker



Currently being used
in this manner –
Consumers are using
tool in this way after
the main wave of
E&A

Media coverage
provides links to the
tool to use in this
way

Forum views

Working Group

Does not support the modification

Proposed Solution makes the tool a Smart Mode Checker

Suppliers should be first point of contact

TABASC

Remained neutral

Suppliers should approve the data being presented

SSC

Remained neutral

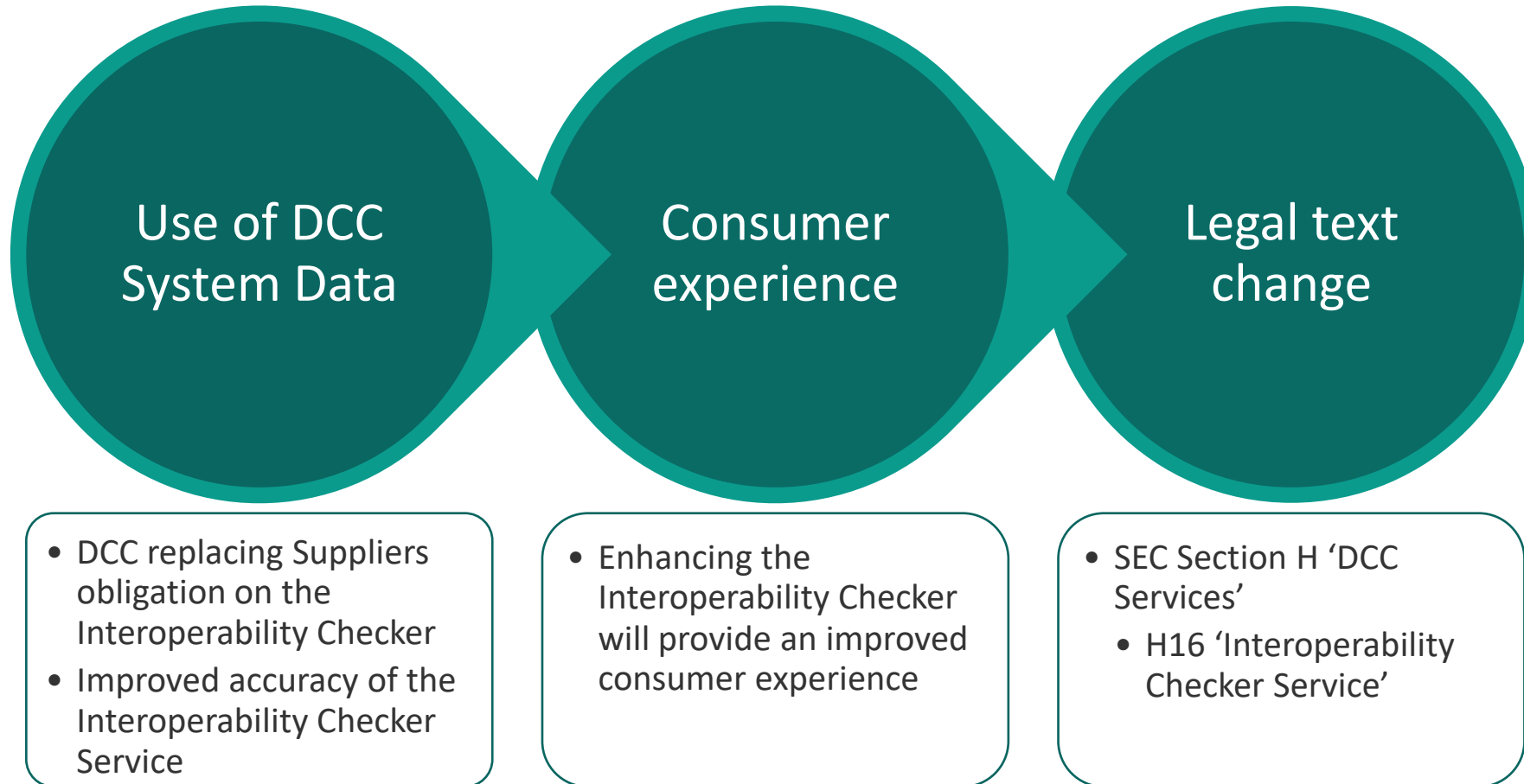
Satisfied with changes being made to the Interoperability Checker are secure

OPSG

Did not support the modification

Believe that the policy data provided by Suppliers should be up to date

■ Proposed Solution Summary 1/2



■ Proposed Solution Summary 2/2

Report 1 (weekly)

Serves business requirements 1 & 3

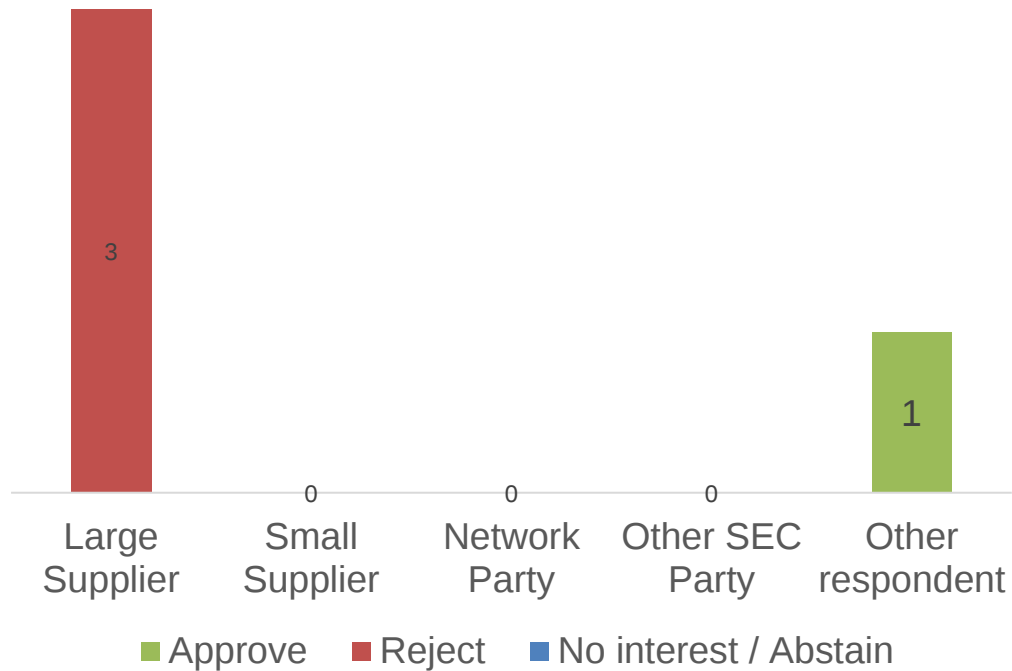
- **Data indicating whether their smart meter can operate in Smart Mode**
- **Data indicating whether if a switch of Supplier occurs, that the meter would continue to operate in Smart Mode**
- SRV 4.6.1 'RetrieveImportDailyReadLog'
- SRV 4.8.1 'ReadActiveImportProfileData'
- SRV 4.8.2 'ReadReactiveImportProfileData'
- All variants of SRV 4.1 & SRV 4.4
- SRVs which read Import, billing and Change of mode details

Report 2 (daily)

Serves business requirement 2

- **Data indicating whether their smart meter is currently operating in Smart Mode**
- For each Enrolled SMETS1 Smart Metering System, whether the Responsible Supplier is operating a Smart Metering System in Smart Mode

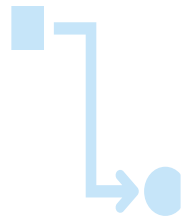
■ MP241: MRC Responses



Key comments

- Interoperability Checker tool has outrun its purpose (for checking SMETS1 Interoperability)
- New use cases for the tool is inappropriate, even with a potentially improved data source
- Consumers Energy Supplier should be first point of contact
- Focus should shift to completing SMETS1 enrolment by 31 Dec 2024 due to designated TMAD
- The tool is highly popular with consumers, and it empowers them to understand their Smart Meter operability.
- The Interoperability Checker Service is also utilised by independent advice providers, who use this tool to provide Consumers with pertinent advice.
- The tool is in line with Ofgem to build Consumer confidence.

■ MP241: Assessment of Change



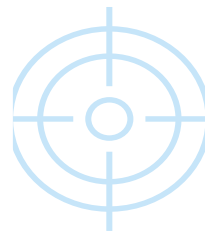
Impacted Parties

- Large Suppliers
- Small Suppliers
- DCC



Costs

- £86,862
- SECAS implementation costs



Target Release

- Ad-Hoc SEC Release
- 10-month lead time



Benefits

- Improves the accuracy of the Interoperability Checker Service
- Potentially reducing the number of enquiries to the DCC

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

SEC Objective (c)

(c) 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

■ MP241: Recommendations

- **DETERMINE** whether this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision against the General SEC Objectives

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

SEC Objective (c)

(c) 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

■ MP263: 'Improving transparency of DCC indicative costs'

Georgie Severin

Raised by Rochelle Harrison from British Gas
Self-Governance

LOW

Overview

- DCC are required to publish indicative Charges and budgets quarterly
- Detail included is insufficient to allow SEC Parties to estimate their Service Charges

Issue



- SEC Parties are unable to accurately estimate their Service Charges
- SEC Parties are unable to scrutinise DCC costs
- SEC Parties utilise additional resource trying to source the extra info and estimate charges

Impact

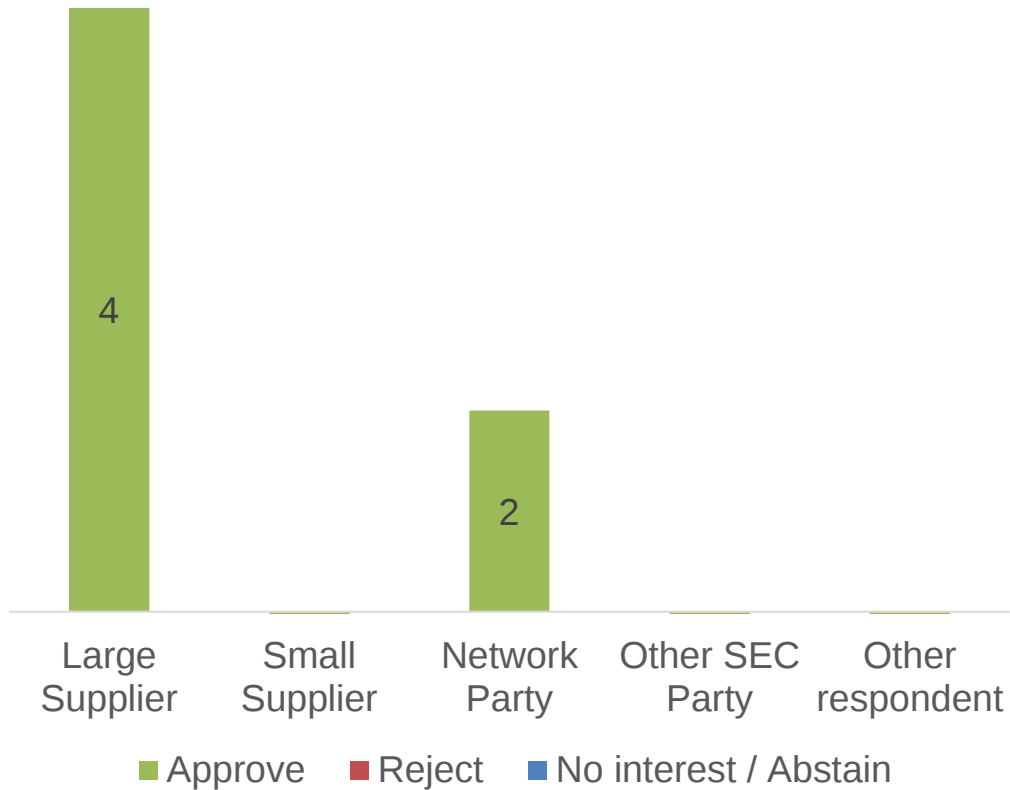


- Include additional data requirements within DCC Section J 'Charges'

Potential Solution



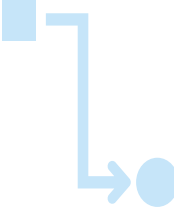
■ MP263: MRC Responses



Key comments

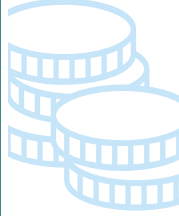
- MP263 would provide better transparency of DCC indicative costs.
- Five-day window to rectify identified errors should be reviewed – the five-day window is to acknowledge and notify only. Revised statements should be uploaded to the DCC website as soon as reasonably practicable.

■ Assessment of Change



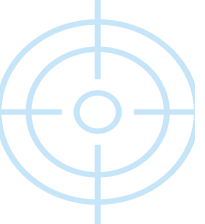
Impacted Parties

- Suppliers
- Network Parties
- DCC



Costs

- SECAS implementation costs



Target Release

- Nov 2024 SEC Release



Benefits

- Transparency of DCC estimated charges
- Charge transparency will allow the DCC to comply with their own DCC License more effectively.

SEC Objectives (b), (g)

(b) 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.

(g) facilitate the efficient and transparent administration and implementation of this code.

■ MP263: Recommendations

- **AGREE** this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision relating to the General SEC Objectives

SEC Objectives (b), (g)

(b) 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.

(g) facilitate the efficient and transparent administration and implementation of this code.

■ MP270 'Enabling DCC to provide SMDA Test House services'

Georgie Severin

Raised by Bradley Baker from the Data Communications Company (DCC)

Self-Governance

MEDIUM

■ MP270: Overview

- SMDA Testing Service tender is now open to SEC Parties, the DCC and its Service Providers.
- The DCC believes that, if awarded the contract, it would provide the service under “Mandatory Business”
- The SMDA testing services are not listed in the SEC as an ‘Enabling Service’
- Therefore, the DCC cannot provide the Services unless included

Issue



- DCC is at risk of being non-compliant with the SEC and its own obligations when bidding for – and if awarded – the SMDA Testing Service contract without these changes to the SEC.

Impact



- The Proposed Solution will include clarifying terms for the DCC carrying out the SMDA Testing Service, provided it is awarded the contract.

Proposed Solution



Change Sub-Committee

Questioned whether there was a lack of tenders for the SMDA Test House role

Modification would allow DCC to tender for SMDA Test House role, potentially cost-effective

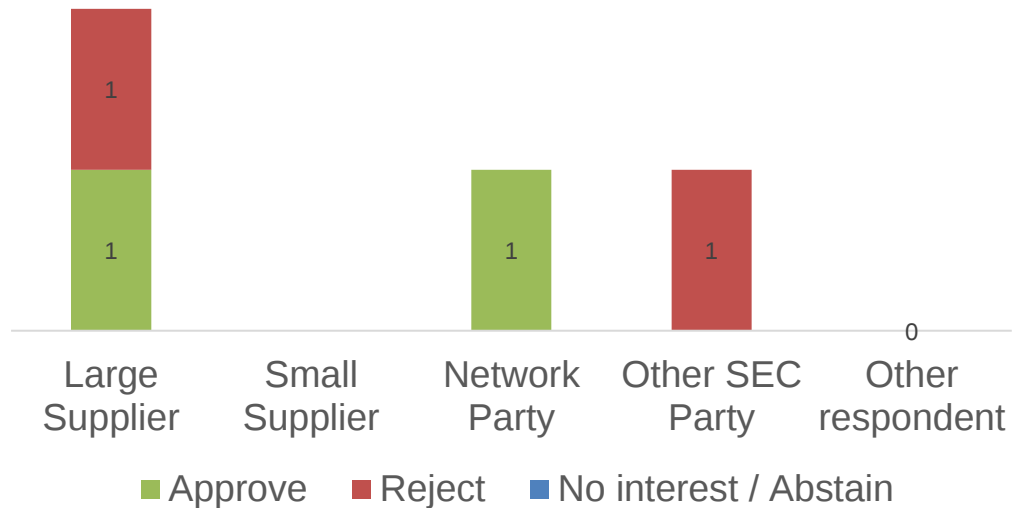
SMDA Sub-Committee

Raised significant concerns about the current drafted legal text (ETAD obligations)

DCC would be required to comply with the well-established rules/processes of the SMDA

Following this feedback, the SMDASC Chair and the DCC reviewed and amended the legal text drafting

■ MP270: MRC Responses



Key comments

- Approving Party believed that if the DCC is awarded the SMDA Test House role, the legal text would facilitate the ability to provide this Service.
- There are clearly benefits of testing being undertaken by teams with knowledge and experience of it.
- Detailed list of clauses that have been added in the proposed Legal text are correct

■ Modification Report Consultation key points

Respondent comment

The legal text is not currently robust enough, as it does not include requirements for independent separation of DCC current test services and any SMDA Services the DCC would provide. SMDA services should also be subject to contracts between the SMDA and DCC, however DCC is in a unique position where amongst other requirements it provides testing for communications hubs. To do so DCC uses meter devices for regulatory purposes.

SECAS response

The DCC has been transparent in its tender response regarding potential conflicts of interest. The way these would be mitigated has been fully described therein. The DCC's SMDA Testing Service will be a standalone team and separated from the DCC's programme delivery teams and any device testing they may do. The separation will also be clarified within its designated policy.

■ Modification Report Consultation key points

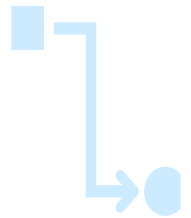
Respondent comment

In addition, considering that SMDA services are subject to commercial contract agreements between the appointed test house and SMDA, we disagree that the legal text (see new suggested clause 19 for appendix J) should be specifying DCC publishing policies that Test Participants must comply with. No other successful bidder would have a regulatory requirement to do so.

SECAS response

The nature of this SEC modification is to allow the DCC to tender for and – if awarded the contract – carry out SMDA Test House services whilst remaining compliant with its License Conditions. The policy developed as per the legal text would be subject to SMDASC input and approval. This policy would only apply to Testing Participants in respect of SMDA DCC Testing, who would also be in commercial agreement with the SMDA Test House when utilising its services.

■ MP270: Assessment of Change



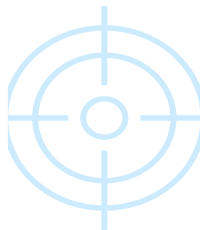
Impacted Parties

- DCC



Costs

- SECAS implementation costs



Target Release

- November 2024 Release



Benefits

- Allows the DCC to remain compliant with SEC and obligations if awarded the SMDA Testing Contract

SEC Objective (d)

(d) Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

■ MP270: Recommendations

- **AGREE** this Modification Proposal should proceed to vote
- **DETERMINE** whether this Modification Proposal should be **APPROVED** or **REJECTED** under Self-Governance
- **PROVIDE** rationale for this decision relating to the General SEC Objectives

SEC Objective (d)

(d) Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy.

BREAK



PLEASE RETURN IN 10 MINUTES

Agenda Item 4

Impact Assessment Request

■ MP268 'Certificate rotation and expired Certificates'

Ben Giblin

Raised by Bradley Baker from the DCC

HIGH

■ MP268: Overview

Issue

- The new manufacturing Certificates will have a 17-year Validity Period to align with the existing Organisation Certificate Authority Certificate which expires in 2041
- SMKI PMA deems that Certificates with a Validity Period longer than ten years are an increased security risk
- There are implicit requirements for the DCC, Suppliers and Network Parties to replace revoked and expired Organisation Certificates

Impact

- Devices using current manufacturing pack certificates will need replacement post-2026 due to expiry but no explicit requirement in the SEC to do so

Proposed Solution

- DCC to replace longer Validity Period Certificates on Devices following successful I&C with ten-year Validity Period Certificates to mitigate security risk
- Make the currently implicit requirement to exchange expired or revoked Certificates explicit

Working Group

Supports the modification

Agreed there is a lack of explicit instruction to replace Certificates

Should not impact I&C – Highlighted Certificate replacement should take place after 7 Working Days

TABASC

Believe Certificate replacement should take place after 48 hours but before 7 days

Most Suppliers have completed I&C after 48 hours and before 7 days to better align to PCO

SSC

Remained neutral

Certificates should be updated no sooner than 48 hours and not later than 23 days after I&C

Reporting requirement is captured within current PCO reporting

■ MP268: Proposed Solution Summary

Automatic Organisation Certificate replacement

- Daily automatic initiation of ACB Certificate replacement
- Criteria – Devices which hold manufacturing Certificates where 48 hours have passed since their commissioning
- Replacement takes place
- If replacement fails, the system retries every 7 days for up to three attempts (21 days total)

Prioritisation and backlog management

- Newly commissioned Devices (within the last 23 days) are prioritised for ACB Certificate replacement
- This allows newer Devices to be updated promptly while the system manages the backlog

Exclusion

- Large proportion of PPMID Devices are excluded from ACB replacement due to known issues in supporting the command

■ MP268: Proposed Solution - Reporting

Reporting detail

- Validity Period exceeding ten years
- Are revoked or expired
- Expiring within 18 months
- Are incorrectly assigned in Trust Anchor Cells

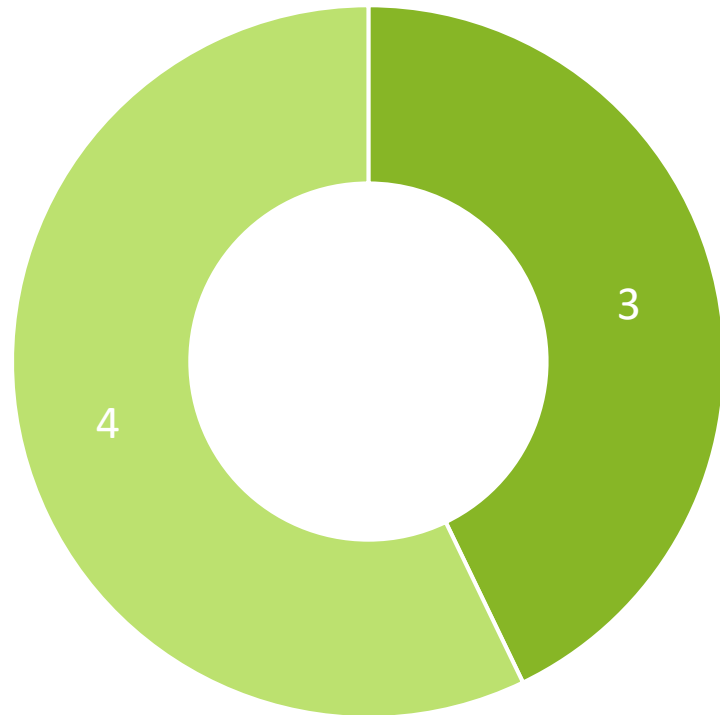
Data Points

- GUID
- Device ID
- Device type
- Operational status
- Key location
- Certificate details
- Expiration dates

This additional reporting will be part of the existing monthly Post Commissioning Obligations

Service Users and CSP Service Provider receives a weekly report detailing all their Devices which are currently failing the PCO checks as introduced under MP183 'Post Commissioning Obligations Reporting'

■ MP268: Industry views

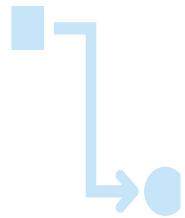


■ Large Supplier
■ Small Supplier
■ Network Party
■ Other SEC Party
■ Other respondent

Key comments

- All respondents are supportive and agree that the solution will effectively resolve the issue
- Costs query
 - Industry forced to pay to fix an issue created by another Party
 - One Network Party stated an internal cost of £100,000 to develop a process to review and replace Certificates (initial and ongoing work)
- What are the impacts to consumers?
 - No direct impact on consumers
 - Provides enduring security of Data and Smart Metering Systems

■ MP268: Assessment of Change



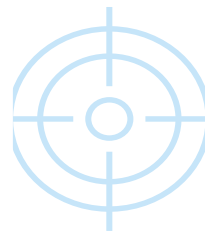
Impacted Parties

- Suppliers
- Electricity Network Operators
- DCC



Costs

- SECAS costs
- £10,000 - £160,000 costs in PA
- £17,636 to complete IA



Target Release

- Nov 2025 SEC Release



Benefits

- Explicit instructions and criteria when Certificate replacement should occur

SEC Objective (f)

(f) To ensure the protection of Data and the security of Data and Systems in operation of this Code

■ MP268: Recommendations

- **AGREE** that this DCC Impact Assessment should be requested

Summary	
Costs for DCC IA	£17,636
Timescales to complete	40 working days
ROM costs to end of PIT	£10,000 - £160,000

Agenda Item 5

SEC Modifications Timetable
update

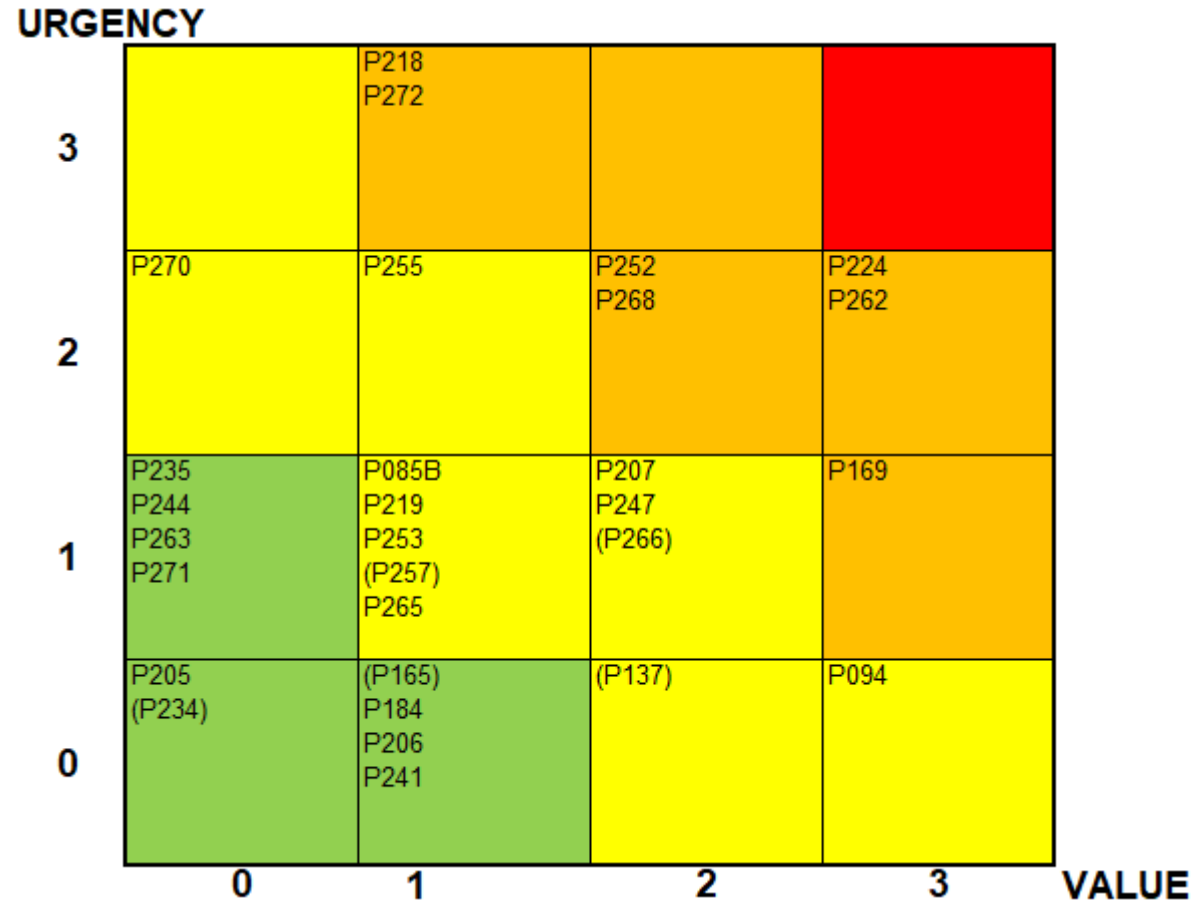
■ Monthly summary

DP197 was withdrawn on 17 August 2024.

We are working on 29 active modifications, with five currently on hold.

We are examining seven issues.

■ Prioritisation matrix



MP272 was raised and progressed to the Report Phase.

DP197 has been withdrawn.

Modifications with brackets () are on hold.

■ High and very high priority mods

MP169 'Managing SEC obligations and the Consumers Right to refuse a smart meter'

- SECAS is working with the Proposer to assess the responses to the RFI before deciding on the next steps for this modification.

DP218 'Review of the SEC Charging Methodology'

- SECAS will hold another ad hoc Working Group after the DCC RFI conclusions document has been published.

MP224 'Performance Assurance Framework'

- This modification was recommended for approval by Change Board in June 2024.
- The expected decision date from the Authority is 7 November 2024.

■ High and very high priority mods

MP252 'Amending the process for Communications Hub returns'

- The Refinement Consultation is open until 9 October 2024.

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

- On Tuesday 20 August 2024 the CSC upheld the decision of the Change Board to reject this modification.
- The Proposer has referred this decision to the Authority for final determination in line with SEC Section D.

MP272 'SMKI Document Set Changes 2024'

- Progressed to the Report Phase at the CSC meeting on 17 September 2024.

DCC Assessments

Modification	IA/PA	Requested	Accepted	Returned	Working days open (as of 18 Sep 2024)
205	PA	5 Sep 24	12 Sep 24	9 Oct 24 (targeted)	5

Agenda Item 6

MP271 – proposed legal text changes

■ MP271 'Sub-Committee seats for Other Users, Meter Data Retrievers and Registered Supplier Agents'

Ben Giblin

Raised by James Murphy of Stark

LOW

■ MP271: Overview

- The Other SEC Party (OSP) category consists of 159 organisations which have different priorities and issues.
- The Proposer believes it is difficult for OSP representatives to fully represent the constituency.

Issue



- Without representation for OSPs which are DCC Users, insight may be missing from discussions.

Impact



- Re-allocating one existing OSP seat at TABASC and Change Board to an elected Party acting in role of OU, MDR or RSA.
- This will not change any existing voting arrangements.

Proposed Solution



■ MP271: Existing representatives

Sub-Committee	Representative	Organisation	Type of organisation
TABASC	Ian Lovatt	Chameleon Technology (UK) Limited	Manufacturer
	Matthew Hallchurch	Elster Metering Limited	Manufacturer
Change Board	Nick Winfield	Landis & Gyr Limited	Manufacturer
	Ian Lovatt	Chameleon Technology (UK) Limited	Manufacturer
	Patrick Caiger-Smith	Green Energy Options Limited	Manufacturer

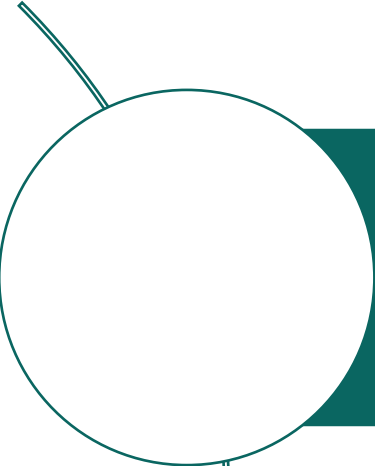
In the previous five years, only one election (2021/2022) for OSP seats at Change Board has taken place. In the other years, only three applications were made for the three OSP seats at Change Board therefore no elections were required.

The Proposer is also seeking to make changes to the CSC and OPSG however this is taking place outside the scope of this modification via Terms of Reference changes.

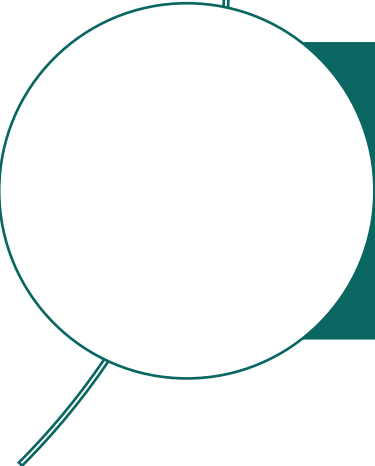
■ MP271: Legal Text

- “Three persons appointed by the Party category representing the Other SEC Parties;
 - One person must be acting in the User Role of Other User, Meter Data Retriever or Registered Supplier Agent.
 - Where no Other User, Meter Data Retriever or Registered Supplier Agent apply, any person from the Other SEC Party category who has applied to the seat may be appointed”.

■ MP271: Questions



Do you have any comments about the proposed changes to the membership of the Change Board?



Any further comments?

Next Steps



Agenda Item 7

Change Board Meeting
Dates 2025

Change Board Meeting Dates 2025

- We propose to continue with the current schedule, with meetings taking place on the Wednesday 5 weeks after each scheduled CSC meeting.
- December meeting would have been 24 December, so have rescheduled to 17 December.

Change Board meeting date
Wednesday 22 January 2025
Wednesday 26 February 2025
Wednesday 26 March 2025
Wednesday 23 April 2025*
Wednesday 21 May 2025
Wednesday 25 June 2025
Wednesday 23 July 2025
Wednesday 20 August 2025
Wednesday 24 September 2025
Wednesday 22 October 2025
Wednesday 26 November 2025
Wednesday 17 December 2025

* Good Friday 18 April, Easter Monday 21 April

■ Recommendations

- **NOTE** the proposed meeting date schedule for 2025.

Agenda Item 8

Any Other Business

- Does anyone have any other business?

YOUR FEEDBACK MATTERS

GET IN TOUCH WITH YOUR THOUGHTS AND COMMENTS

SEC.Change@gemserv.com

Want know more about SEC Change and Modifications?
Why not listen to our Modcasts?!

Available to listen on our [website](#) or [LinkedIn](#)

Thank you for attending

Next meeting:
Wednesday 23 October 2024

SEC OBJECTIVES 1/2

SEC Objective (a)

(a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

SEC Objective (b)

(b) enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence

SEC Objective (c)

(c) Facilitate energy consumers management of their use of electricity and gas through the provision of appropriate information via smart metering systems

SEC Objective (d)

(d) Facilitate effective competition between persons engaged in, or in commercial activities connected with, the supply of energy

SEC Objective (e)

(e) Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy

SEC OBJECTIVES 2/2

SEC Objective (f)

(f) Ensure the protection of data and the security of data and systems in the operation of the SEC

SEC Objective (g)

(g) Facilitate the efficient and transparent administration and implementation of the SEC

SEC Objective (h)

(h) Facilitate the establishment and operation of the Alternative Home Area Network (Alt HAN) arrangements