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SEC Change Board Meeting 95

23 October 2024, 10:00 – 11:50

Teleconference

SECCB_95_2310 – Draft 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
	Kevin Wollard (KW) (<i>Alternate</i>)	British Gas
	Kevin Clark (KC)	Utilita
	Sharon Armitage (SA)	E.ON
Small Suppliers	Daniel Davies (DD) (<i>Alternate</i>)	ESG Global
	Gareth Evans (GE)	Waters Wye
Network Parties	Jacqueline D'Angelo (JDA)	UK Power Networks
	Rachael Prosser (RP)	National Grid Electricity Distribution
Other SEC Parties	Ian Lovatt (IL)	Chameleon Technology
	Patrick Caiger-Smith (PCS)	GEO Together
	Nick Winfield (NW)	Landis+Gyr
Consumers	Faye Brookes-Lewis	Citizens Advice

Other Participants

DCC		
Robin Seaby (RS) (<i>Proposer of MP241</i>) (<i>Part Meeting – MP241 Discussion</i>)	Chris Barlow (CB) (<i>Part Meeting – MP241 Discussion</i>)	David Walsh (DW)
Ofgem		
Ian Chalfon (IC)	Cristina Ullastre (CU)	
SECAS		
Rachel Black (RB) (Meeting Secretary)	Ben Giblin (BG)	Liz Woods (EW)
Mohammedanwar Sumro (MS)	Simon Grimwood (SG)	

Apologies:

Representing	Change Board Members	Organisation
Large Suppliers	Emma Johnson (EJ)	British Gas
Small Suppliers	Carolyn Burns (CB)	ESG Global
	Christie Thomson (CT)	SSE
Network Parties	Tom Stuart (TS)	WW Utilities

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. Actions Outstanding

Action Reference	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. This was discussed during Agenda Item 3 (MP241). Status: Closed
94/02	SECAS to investigate where GPF information comes from, in relation to MP241.

Action Reference	Action
	A member (JM) stated that the action has been answered but advised that whether or not the Gas Proxy Function (GPF) can communicate is not a sign that a gas meter is communicating. They added that an empty payload is a sign that it is not receiving communications from a gas meter. They stated that a successful Service Request targeting GPF does not determine if it is communicating. Another member (EL) agreed and advised that the DCC does not have the ability to view if a Device is communicating, and can only view if a Service Request is travelling to and from the Device. However, they advised they were happy to close this action, and the issue would be discussed further in Agenda Item 3. Status: Closed

3. Change Board Votes

MP241 'Interoperability Checker Update'

The Change Board was invited to perform the final vote on [MP241 'Interoperability Checker Update'](#).

The member (DR) asked if there is a confirmed billing frequency that will be used to assess if the meter is communicating. SECAS (MS) advised that the Impact Assessment reported that the DCC will check if SRs and responses have been exchanged within the previous 35 days. The Proposer (RS) added that the non-communicating reports to the Operations Group (OPSG) are based on this criteria. The DCC (RS) noted that the DCC Impact Assessment could focus on a set of Service Requests that retrieve consumption data from meters or the GPF within 60 days. They advised this could be extended to cover quarterly billing. They advised that 60 days was chosen as it would ensure a month of billing dates was covered. They advised they can update the criteria based on these discussions and can be updated again based on the new agreed definition of what a non-communicating meter is. They explained that the interoperability checker gives consumers an indicator of Smart Meter communication and how the Energy Supplier operating the Smart Meter is retrieving billing data from it.

A member (EL) advised that the Department for Energy Security and Net Zero (DESNZ) relies on reports by Energy Suppliers, and not reports from the DCC. The Proposer noted this and advised that a lot of discussion in the work stream investigating non-communicating Smart Meters is taking place to understand how to categorise a non-communicating meter, and it may involve data sources that the DCC does not have access to. Therefore, they advised that the DCC providing such information to consumers via the interoperability checker could create confusion.

The member (JM) advised that a Service Request successfully sending to a GPF does not necessarily mean a Gas Meter is communicating, as the DCC cannot see the payload. They noted the DCC can send Service Request 4.6.1 and the Gas Meter will successfully respond, but there will be no payload. The Proposer agreed the DCC cannot see inside payloads of responses and can only report on the data they have access to. However, if there is an agreed view, the DCC will only need to look at billing requests to update the criteria. They highlighted that the aim of MP241 is to arrive at a sensible criterion for the Interoperability Checker, which will indicate to consumers if a meter is communicating. The member noted that not everyone is using billing alerts as it is not required, and everyone has their own choice of frequency. Therefore, they advised there is no definite way for the DCC to show a Gas Meter is communicating.

Another member (IL) queried if it is more beneficial to approve this as an interim solution until it can be aligned with the work being carried out by the OPSG. The Proposer advised they want to retain control over the criteria of internal reports and refine these over time to align with the OPSG. They will also control the criteria the data is based on so the DCC can produce new reports with minimal costs and can make changes as needed. The Chair asked how these changes will be governed. The Proposer advised they would discuss this at OPSG and send out communications to Users if there are any changes being made to the criteria. They advised they would also involve Citizens Advice to ensure the wording on their website remains accurate. The Chair advised that this is not highlighted in the Modification Report. SECAS (MS) advised that alignment with OPSG when the new definition is agreed is referred to, but there is nothing about how the DCC will take MP241 forward after it has been implemented. The Proposer clarified that they are not proposing the changes will need to be approved at OPSG, but they will discuss this with them. A member (IL) asked if the OPSG are aware of this. The Proposer advised it is not the primary subject of discussion at OPSG, but they will raise an agenda item with OPSG to ask if their work should be linked with the Interoperability Checker. The member agreed this would be beneficial.

A member (EL) advised that DESNZ and Suppliers have many definitions for non-communicating. They advised that DESNZ have broken down the criteria they want to know about, and a lot of work has gone into this. They noted that the reports the DCC have produced do not factor in many of the situations they consider. They also noted that OPSG has not begun work yet on this alignment. The Proposer acknowledged there are various definitions, and a lot of work needs to be done to arrive at an industry-wide single definition. They advised if this does happen, the DCC can build this into the Smart Meter Checker. However, improvements can still be made in the meantime.

The Chair asked what information was returned on non-enrolled Smart Metering Equipment Technical Specifications (SMETS1) meters. The Proposer advised that it will say the Smart Meter cannot be found.

The member (EL) highlighted that the slides indicate that the OPSG Chair supports this, but this has not been discussed at OPSG yet so it cannot be said that the OPSG supports this, only the Chair.

The Proposer advised there are no DCC SEC Release costs associated with this, meaning the figure shown is the total cost of implementing MP241. A member (JM) asked how much it will cost to maintain this. The Proposer stated there is already a production service, meaning there will be no additional cost for infrastructure, support costs for Service Providers, or additional costs from the DCC reporting team. The member suggested if the Interoperability Checker is no longer needed in the future and is removed, would this be considered a cost saving. The Proposer advised that scenario would be separate from MP241. The member noted this, but advised it is being proposed that the Interoperability Checker is changed. The Proposer advised that the aim is to make the Interoperability Checker more relevant to people who are using it. Citizens Advice (FBL) explained that the Interoperability Checker was created with an order from the Secretary of State, so a similar action would be required to remove it.

The member (IL) asked if there is any evidence that there will be a negative impact on consumers by providing this interim solution rather than the final solution that comes out of the work being carried out by OPSG. A member (DR) noted if members are not convinced by the definition in relation to Gas Meters, then false expectations will be created and reported by the Interoperability Checker to consumers of how well a Gas Meter is operating. The member (IL) asked what current information is being provided on this. The Proposer advised the Interoperability Checker does not use any Service Audit Trail (SAT) Data to check if a Meter is operating in Smart Mode but instead responds to static data sets. The member noted that the information provided would lead consumers to believe their

Supplier can operate them, which is incorrect. The DCC (CB) disagreed with this in relation to SMETS1. They advised the information is not accurate, but the current assumption is that all SMETS2 operate accordingly, which is incorrect. Another member (DD) advised that the main issue is that the wording is very general but advised this new data set could be more misleading. They observed if responses are retrieved from a Gas Proxy Function (GPF) it does not mean it is working, so the wording must reflect this. They suggested it be written that consumers should contact their Suppliers if they believe it is not working. They also expressed concern about the intent of the Interoperability Checker, as it was built for a specific purpose but now it is to be changed. However, Parties cannot agree on what it should be changed to, which will lead to confusion. The DCC (CB) asked if the member was referring to confusion in relation to Gas Meters or Electricity Meters. The member noted that Electricity Meters are more accurate as GPF is not involved, but the main issue is the intent of the new wording. They queried if more data is included to improve accuracy, will the wording imply that a Smart Meter operates in Smart Mode (which still may not be the case). The Proposer acknowledged the points raised, and advised the wording will be created by Citizens Advice, but the wording will need to highlight that the results are only based on data they have available to them. Citizens Advice (FBL) agreed, and advised they will ensure it is highlighted that consumers should contact their Supplier if they have any issues.

A member (KC) queried if it had been stated earlier that the Interoperability Checker would not show non-enrolled SMETS1 Meters. The Proposer advised this will not change. Today, the Interoperability Checker cannot tell a consumer anything about non-enrolled SMETS1 Meters, and this will remain the same if MP241 is implemented. The member asked if the aim of MP241 was to determine the operability of SMETS1. The Proposer advised this has always been linked with enrolment. They advised the aim is to provide enough accurate information for consumers to make informed decisions in relation to switching Energy Suppliers.

The member (EL) queried if it had been previously said there was a section missing from the Modification Report about MP241 going to OPSG for them to provide input. The Chair advised that the DCC will provide internal reports to the OPSG and asked if the Change Board think this should be written into the Modification Report. The Proposer advised they envisioned this as work progressing through the OPSG, with a definition emerging that the DCC can report on. Then, the DCC can go to the OPSG with a proposal for how and when they produce information for the Interoperability Checker to align with this.

Another member (JM) advised they would like to see the Citizens Advice wording before making a decision on MP241. The member (KC) agreed and noted it does not appear to be much of an improvement.

A member (EL) expressed concern regarding consumers using the Interoperability Checker as a result of not trusting their Supplier, meaning that they are putting their trust in the tool. They noted that if what is being shown on the Interoperability Checker does not align with the view of their Supplier, the consumer will believe the Interoperability Checker. They expressed concern as the wording will advise consumers to contact their Supplier, but the reason most consumers are using it in the first place is because of a lack of trust in their Supplier. The Proposer acknowledged these concerns and stated that the wording on the Citizens Advice website should clearly state what the Interoperability Checker can tell them, and what information can only be obtained from the Supplier. The DCC (CB) added that the tool is being used by consumers for various other reasons, and not because of distrust of Suppliers. They advised the aim is to make the Interoperability Checker more Data driven.

Another member (AH) observed that the majority of members had concerns regarding MP241, and they would like more information regarding the data and wording associated with the Interoperability Checker.

The Chair acknowledged the discussions and proposed that the Change Board defer their decision on MP241. They advised MP241 will be presented at Working Group to investigate the concerns raised, before it is brought back to the Change Board at a later date.

The Change Board:

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

MP253 'Traffic Management for Price Cap Update Events – User Actions Required'

The Change Board was invited to perform the final vote on [MP253 'Traffic Management for Price Cap Update Events – User Actions Required'](#).

The member (JM) advised that they did not agree that MP253 should be approved due to the level of control being applied to the solution. However, they advised if the majority of the Change Board agrees this would be beneficial, they will adhere to it. Another member (AH) agreed with this.

A member (JDA) queried what would happen to scheduled Service Requests raised by Network Parties, as they read voltages daily. SECAS (SG) advised Network Parties will not be impacted, and only Suppliers who send Service Requests (SR) during these times will be impacted.

Another member (DR) asked if the time bands specified as part of the PCID are the times that SRs should not be sent. SECAS (SG) advised that those are the times the DCC would like SRs outlined within the Price Cap Instructions Document (PCID) to be sent during Price Change Update Events (PCUE), and that any non-essential activity should not be carried out during these times.

The member noted that they may have consumers whose Devices need to be moved away from Prepayment mode, and they will send SR 1.1.1 to them, and asked if they should send these between 00:00 – 05:00 or receive them between 00:00 – 05:00. SECAS advised they should all be sent as future dated SRs during these times, and should relate to those SRs specifically, and be sent within the times shown. The DCC (DW) added that all SRs specified in the PCID should run to the times specified in line with the Service Level Agreements (SLA) outlined.

The member (IL) noted that their organisation often acts on behalf of a DCC User and asked if they are bound by the same rules. SECAS (SG) clarified that it is only Suppliers who send SRs 1.1.1, 1.2.1 and 4.6.1 during these times that are impacted. The Chair added that Suppliers are the ones affected as this modification is related specifically to tariff updates. SECAS agreed and advised that the bulk of traffic comes from Suppliers applying tariff updates during these times. They advised that the aim is to manage traffic through the use of future dated messages during this time. A member (EL) agreed with the member, and advised they were under the impression that all Users were impacted. SECAS advised that the issue is not limited to Suppliers but acknowledged that the bulk of traffic during PCUEs is driven by Suppliers. Therefore, if the bulk of traffic during these times can be managed then it can prevent an overload of traffic at these times. They stated this was outlined in the PCID.

A member (PCS) asked if this relates to another modification relating to traffic management that was raised by Utilita, that intended to stop non-critical communications during these times. SECAS (SG) advised that Utilita originally raised MP253 but allowed the DCC to adopt it as they wanted to address PCUE traffic first rather than all traffic. The DCC (DW) noted that [MP247 'Future Dating of Service](#)

[Requests for SMETS1 Devices'](#) also focuses on future dating Smart Metering Equipment Technical Specification (SMETS)1 SRs.

The member (IL) noted that the title of the Modification and text of the PCID do not align, as the Modification title reads as if consumers of Other Users need to abide by this, and not only Suppliers. SECAS (SG) noted this and clarified that it is applicable to Suppliers only in this scenario. They advised that the DCC will continue to encourage best practice for all Parties via regularly issued guidance, but MP253 aims to only obligate Suppliers to follow these actions, and the expectation is that other Parties will follow guidance voluntarily.

A member (DR) asked if they will be acting outside of the obligations if they are carrying out a Smart Meter change on the day of a Price Change Event. SECAS (SG) advised that Install & Commission (I&C) is considered essential activity.

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

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	4	3	0	Approved
Small Suppliers	2	0	0	Approved
Network Parties	2	0	0	Approved
Other SEC Parties	3	0	0	Approved
Consumers	1	0	0	Approved
Overall conclusion:				Approved

The majority of the Change Board believed that MP253 will better facilitate SEC Objectives (a)¹ and (c)² for the reasons given in the Modification Report Consultation responses. There were multiple reasons as to why some members voted to reject. One member advised they were unaware that this would impact Suppliers only as described in the Modification Report, and another advised they do not believe the DCC should control this, and it goes against SEC Objective (e)³. Another member advised they do not believe MP253 is necessary.

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 6 November 2024**. If no referrals are received, the decision will be final.

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 to them of appropriate information by means of 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.

MP272 'SMKI Document Set Changes 2024'

The Change Board was invited to perform the final vote on [MP272 'SMKI Document Set Changes 2024'](#).

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

The Change Board unanimously believed that MP272 will better facilitate SEC Objective (g)⁴ 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 6 November 2024**. If no referrals are received, the decision will be final.

4. Request for Impact Assessment

MP252 'Amending the process for Communications Hub returns'

The Change Board was presented with the DCC Impact Assessment request for [MP252 'Amending the process for Communications Hub returns'](#).

The Chair asked if Solution Option C is similar to Solution Option B but is easier for Suppliers. The DCC (DW) disagreed and noted it is similar to Solution Option A, but with multiple routes for returning Communications Hubs. They advised Solution Option C would keep the original Communications Hub returns route but would have the mechanism to process where a Service Request 14.3 has not been or could not be submitted. They highlighted that Parties are keen to progress this quickly, and there is a strong business case for this.

A member (DD) asked if Solution Option C relates to old or new DCC Service Management System (DSMS). The DCC (DW) advised it will be included into the new DSMS - Future Service Management Solutions (FSM), which is replacing the Remedy. The member also asked if Option C includes 4G Communications Hubs. The DCC confirmed it will.

⁴ To facilitate the efficient and transparent administration and implementation of this Code.

The Change Board:

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

5. SEC Modification Timetable

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

The Chair provided a further update on [DP218 'Review of the SEC Charging Methodology'](#). They advised that the summary of the DCC Request for Information (RFI) responses is now on the DCC website. They stated that the DCC have narrowed down the solution options and will issue another consultation in November 2024, which will conclude in January 2025. They advised a webinar will be held during the consultation period to answer any queries during this time.

While discussing [MP224 'SEC Performance Assurance Framework'](#), a member (KW) asked if it is approved by Ofgem, is there a timescale for when the Performance Assurance Board (PAB) will be set up. The Chair advised that SECAS have made preparations for this and will send out a call for nominations to join the PAB shortly after the Ofgem approval. The Chair advised they are not expecting a meeting to be held before the end of 2024, but it depends on how quick the progression is.

The Change Board:

- **NOTED** the update

6. Any other business

SECAS advised the members of upcoming webinars. These were the Modifications Improvement Project on 28 October 2024, the Privacy webinar on 8 November 2024, and the Security Assessment webinar. Members were advised to email SECAS@gemserv.com if they were interested in attending any of the above webinars.

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

Next scheduled meeting date: 20 November 2024