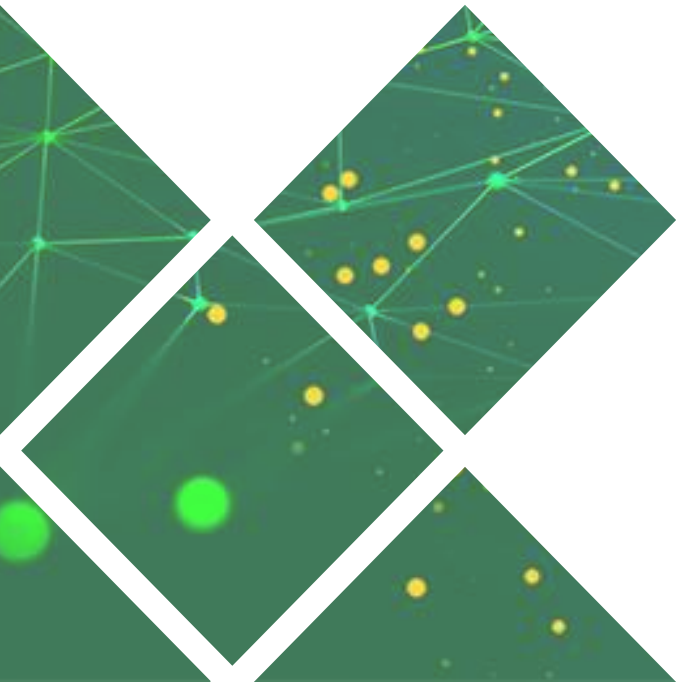


Change Board Meeting 99

26 February 2025



Meeting Recordings

- Going forward, SEC Sub Committee meetings will be recorded for the purpose of ensuring accuracy of meeting minutes. By participating in the meeting, you accept that your voice will be recorded for this purpose.
- Just a reminder that we should be able to have free discussions of ideas



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. Welcome New Members
2. Approval of previous meeting minutes
3. Change Board votes
4. SEC Modifications Timetables update
5. AOB

Agenda Item 1

WELCOME NEW
MEMBERS

Agenda Item 2

Approval of previous
meeting minutes
Sophia Master (SECAS)

■ Recommendations

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

Agenda Item 3

Change Board Votes

■ MP252 'Amending the process for Communications Hub returns'

Liz Woods

Raised by David Lane on behalf of SMS Plc
Self-Governance

HIGH

Overview

- DCC identified over 65k CHs (Proposer has 20k); not at consumer premises and with non-Responsible Parties
- Non-Responsible Parties unable to identify Responsible Supplier due to confidentiality clauses in SEC Section M4
- CH removal & returns process overly complicated and resource heavy
- Expected high volume returns associated with 4G CH&N rollout

Issue



SRV 8.14.3 'CommsHubStatusUpdate-FaultReturn'
SRV 8.14.4 'CommsHubStatusUpdate-NoFaultReturn'

- Only Responsible Parties able to return CHs to DCC
- All CHs marked for return need to be in SMI states of 'Decommissioned' or 'Pending'
- Any returned CH received with SMI state of 'Commissioned' is not processed by CSPs

Impact



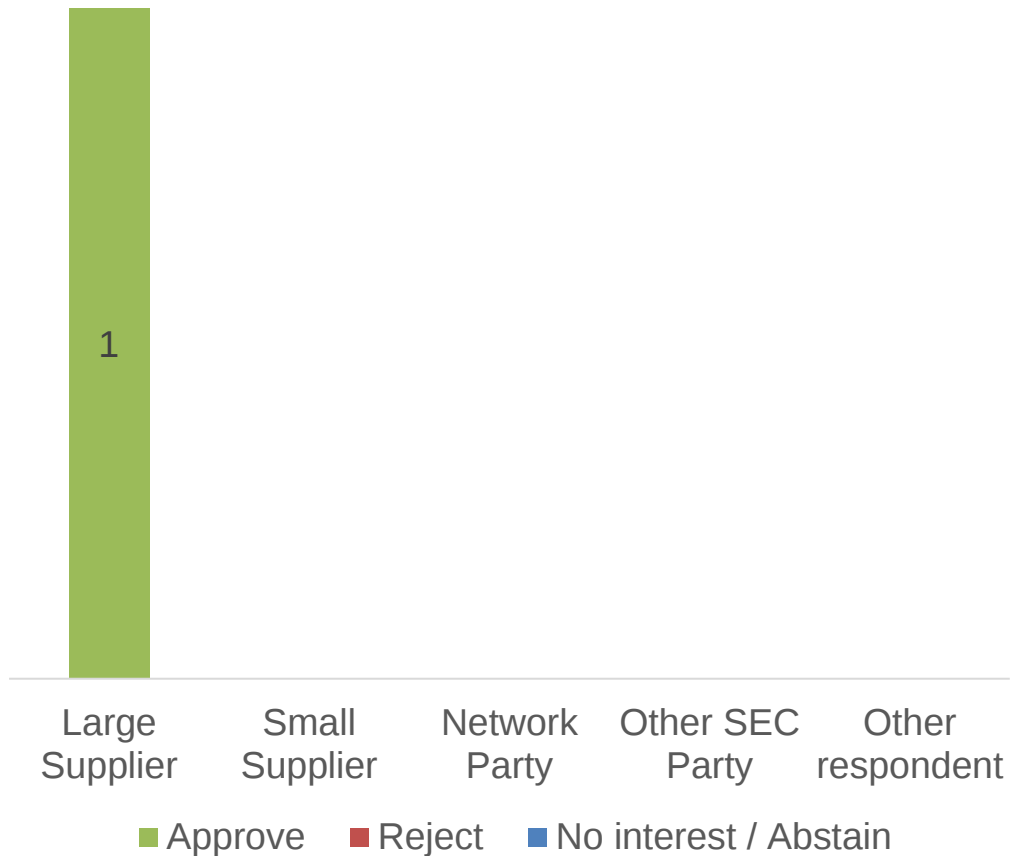
*New DUIS error code = E081406 'The CHF has associated devices which are still communicating'. Requires DCC Users to move to the new DUIS. DCC Users not on new DUIS will get an overloaded/existing error.

- Allows all SEC Parties to return CHs via current method with changes to fault and no fault returns SRVs 8.14.3 & 8.14.4, incl new DUIS Error Code*
- Process changes to the DSP and DSMS with additional validation
- 3 possible routes for the CH return records to be created in DSMS [incl new CH Update Bulk (CHUB) file]
- Changes to SEC Section A & F, Appendix I, Q and AD (DUIS)
- DCC Guidance Document 'Alternative Returns for Communications Hubs'

Proposed Solution



MRC Responses



Key comments

- Modification would resolve a significant bottleneck in capabilities to return CHs efficiently and would reduce the potential waste if CHs cannot be returned, including any manual work to avoid this from occurring.
- SEC Obj (a) & particularly (b) as this links to the DCC's First Enduring General Objective *"...to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code and where relevant the Retail Energy Code."*
- **DUIS Schema uplift** – no preference, however, would rather implement sooner to avoid extended period without the new error codes. Their organisation can implement from Nov 2025 & Adaptor Provider able to support as it's a minimal change.

Forum views

Requirements Workshop

Need to address Comms Hubs stranded with non-Responsible Parties plus expected bulk returns

Need to encourage 'good behaviour' of DCC Users to follow process

Working Group

Agreed BRs address issue

Agreed to proceed to Report Phase

OPSG

More clarity on process and charges

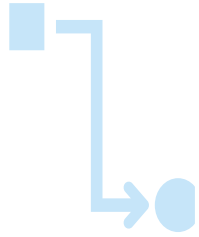
Should consider using refurbishment process

SSC

Keen to understand SEC Party costs

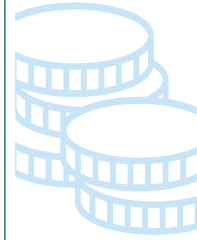
Increased Validation required and blocking rogue actors – no DCC Logistics intervention

■ Assessment of Change



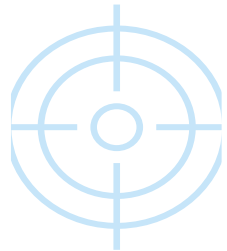
Impacted Parties

- All SEC Parties



Costs

- Party costs – less than £100k
- £329,626 + Application Support (£24,563 for 1st year)



Target Release

- Nov 2025 SEC Release



Benefits

- Creates path for all CHs returned to be processed

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

■ MP252: 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 relating to the General SEC Objectives

SEC Objective (a) & (b)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (b) enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

■ MP277 'Virtual Gateway Connection'

Simon Grimwood

Raised by Chris Barlow from the DCC
Self-Governance

VERY HIGH

Overview

- SEC Parties wishing to become a DCC User must currently take up a physical DCC Gateway Connection
- Prospective and existing DCC Users who utilise cloud-based IT infrastructure must still maintain some form of premises to utilise a physical connection
- DCC are consistently receiving queries about virtual connectivity

Issue



- A lack of virtual connectivity could dissuade potential new Users from becoming a DCC User
- Current lead-times to establish a physical connection is 90 working days
- Virtual connectivity is likely to be a cheaper alternative for a lot of DCC Users, meaning savings are not currently being realised

Impact



- New and existing DCC Users could opt for a Virtual Gateway Connection
- Physical connection will still be available
- Impacted SEC Documents:
 - Sections A, E & H
 - Appendix G

Proposed Solution



■ Proposed Solution

- Implements a Virtual Routing & Forwarding (VRF) component & new virtual Firewall for each cloud connected DCC User
- Virtual Firewall would route traffic between each DCC Users VRF and the SMETS2 VRF.
- Firewall would only allow cloud-based DCC Users to access the Data Service Provider (DSP), Trusted Service Provider (TSP) & Service Now (SNOW)
- Maximum of 14 cloud-based DCC Service Users can connect to a Firewall before an additional virtual Firewall would be required

■ Preliminary Assessment Summary

Cost (Design, Build & PIT)

- £160,000 (up to 14 Users)
- £226,285 (up to 28 Users)
- Covers the addition of the VRF, configuration, changes to the Gamma Network, Service Provider contract changes and Design, Build and Test of the updated DSP Catalogue.
- Total cost based on setup and implementation for up to 14 or 28 Users.

Implementation

- A small period post-implementation to update existing documents and set up new infrastructure.
- No Full Impact Assessment will be required as the outcome would not vary from that of the PIA.

Preliminary Assessment – Cost Comparison

Traffic Volume	Costs	New Users		Existing Users	
		Virtual Gateway	Physical Gateway	Virtual Gateway	Physical Gateway
Medium	1st Year Setup	£1,600	£5,500	N/A	
	1st Year Running Costs	£6,500	£9,000		
	Ongoing Running Costs	£6,500	£9,000		
High	1st Year Setup	£1,700	£6,500	£1,700	£6,500
	1st Year Running Costs	£7,000	£15,000	£7,000	£15,000
	Ongoing Running Costs	£7,000	£15,000	£7,000	£15,000

Draft Legal Text

Section A

- Amendments to certain terms and definitions

Section E

- Inclusion of Virtual Gateway Connection option

Section H

- Addition of online assessments to co-exist with Virtual connections

Appendix G

- Addition of Virtual connections to the DCC Gateway Code of Connection

SECAS Lawyers have reviewed the Legal Text and feedback was incorporated into v1.0

■ Forum views (so far) 1/2

SSC

Supportive of the
Modification

Approved the Proposed
Solution

OPSG

Paper provided for
feedback on 13 December
2024 OPSG Meeting

No objections received
from the OPSG

■ Forum views (so far) 2/2

TABASC

Do not support
the Modification

DSP 2 Solution due
in November 2025

TAG

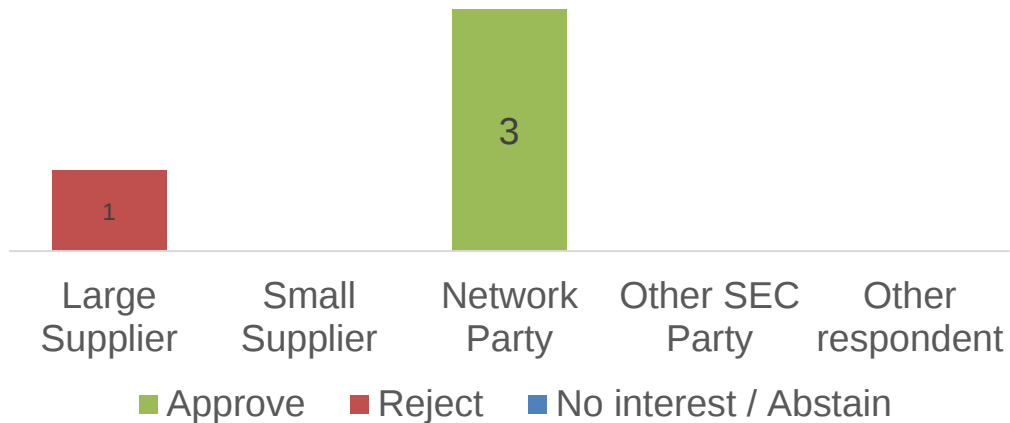
Supportive of the
Modification

No objections
received

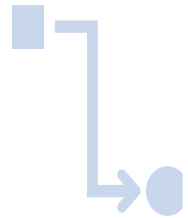
■ Modification Report Consultation Key Points

Key comments

- 3/4 respondents believed the modification should be approved
- Those supporting approval believed MP277 will better facilitate SEC Objectives (a), (d) & (e)
- Respondent recommending rejection believed the business case is insufficient against the associated costs

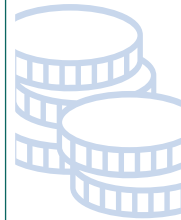


■ Assessment of Change



Impacted Parties

- All SEC Parties



Costs

- SECAS implementation costs
- £160,000 (up to 14 Users)



Target Release

- February 2025 SEC Release
(Ad hoc SEC Release if approval is after 26 Feb 2025)



Benefits

- More efficient process
- Aligns with cloud-based IT
- Opens the door for more DCC Users

SEC Objectives (a), (d) & (e)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (d) facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy
- (e) facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

■ MP277: 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 relating to the General SEC Objectives

SEC Objectives (a), (d) & (e)

- (a) facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain
- (d) facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy
- (e) facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

■ MP280 'CPA scheme transition to the SSC'

Ali Beard

Raised by Gordon Hextall on behalf of the Security Sub-Committee
Self-Governance

Medium

■ MP280: Overview

- Appendix AV 'CPA Transitional Approach Document' designated in Oct 2024
- DESNZ amended Appendix AV to allow SSC to set specific independence criteria, following SSC raising the issue that criteria was too strict when appointing a Scheme Operator

Issue



- Appendix AV will fall away in March 2025 when NCSC exits as the Scheme owner and operator
- The ability for SSC to determine independence criteria where necessary needs to be an enduring clause in the SEC

Impact



- Changes to SEC Section G 'Security' clause 13.5 to include requirements previously stated in Appendix AV 'CPA Transitional Approach Document'

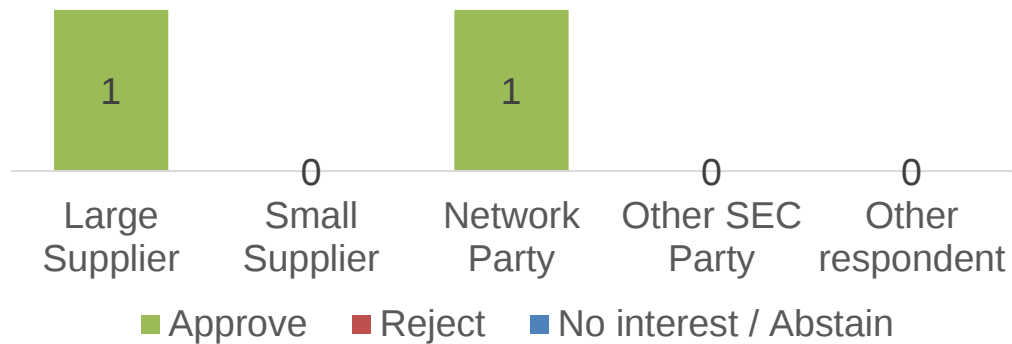
Proposed Solution



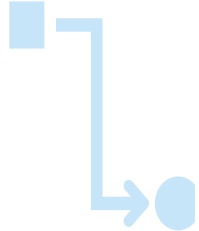
■ MP275: Refinement Consultation key points

Key comments

One respondent believed the modification would better facilitate SEC Objective (g) *facilitate the efficient and transparent administration and implementation of this Code*

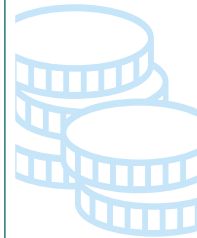


■ Assessment of Change



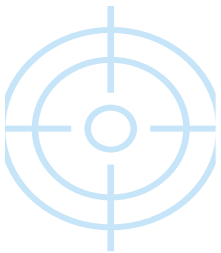
Impacted Parties

- None



Costs

- SECAS time and effort



Target Release

- Feb 2025 SEC Release



Benefits

- Allows appropriate organisation to be procured as CPA Scheme Operator

SEC Objective (g)

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

■ MP280: 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 relating to the General SEC Objectives

SEC Objective (f), (g)

- (f) ensure the protection of Data and the security of Data and Systems in the operation of this Code
- (g) facilitate the efficient and transparent administration and implementation of this Code

Agenda Item 4

SEC Modifications Timetable
update

SEC Modification Timetables

Ben Giblin

■ Monthly summary

31 Active Modifications

Four Modifications on hold
(MP085B, MP137, MP244 and MP247)

Scoping three potential new Issues

No on-going DCC Assessments

Prioritisation matrix

URGENCY

3		P218	P284	P275 P277
2		P255	P252 P268 P282	P280
1	P235 (P244) P271	(P085B) P219 P257 P265	(P247) P266 P273 P281 P283	P169
0	P205 P234 P279	P165 P184 P206 P241	(P137)	P094
	0	1	2	3

VALUE

Raised DP281, DP282, DP283,
DP284

DP278 withdrawn

No changes to prioritisation
scoring

Modifications in brackets are on
hold

■ High and very high priority mods

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

- The Legal Text is being developed.
- SECAS is discussing the Alternative Solution with the Ombudsman, which would require them to remedy that the Restricted Attribute should be applied.
- Another IA required once DCC re-procurement is completed.

DP218 'Review of the SEC Charging Methodology'

- This DCC Consultation closed on 3 February 2025.
- DCC will publish consultation summary and their response in the coming weeks, after which SECAS and DCC will determine the next steps.

MP268 'Certificate rotation and expired Certificates'

- Following discussion at the January Change Board meeting this modification will be presented to the CSC.
- An amendment has been made to the Proposed Solution which will exclude any DCC System changes.

■ High and very high priority mods

MP282 'Removal of Registration Check for Suppliers using SR8.9 targeting SMETS1+ CHF' and MP284 'Extension of life to FOC S1SPKI End Entity Certificates'



Raised at Feb CSC meeting and progressed to Report Phase. Both will be presented to the Change Board next month for final vote.

DCC Assessments

- No DCC Assessments currently taking place. The modifications below are waiting on DCC re-procurement to conclude in April 2025 (estimated).

Modification	Type of assessment	Priority	Next steps
MP169	Re-assessment of IA	High	Finalising Modification Report at CSC.
MP184	Re-assessment of PA	Low	BSC and REC changes being developed before Refinement Consultation and Working Group.
MP235	Re-assessment of PA	Low	PSC deciding on classification of Export Data before Refinement Consultation.
MP244	Impact Assessment	Low	On Hold
MP247	Impact Assessment	Medium	On Hold
MP265	Impact Assessment	Medium	On Hold

Agenda Item 5

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 26 March 2025