

## Stage 01: Modification Proposal

# SECMPO0020:

## Removal of the confidential classification of the unique identifiers listed in SEC Schedule 5

*This Modification Proposal seeks to remove the confidential classification clauses placed in SEC Schedule 5 which prohibits the publication and disclosure of the unique identifier(s) described within it.*

The Proposer recommends that this Modification Proposal should be:



- progressed as a Path 3: Self-Governance Modification

This Modification Proposal should:

- proceed to Modification Report Consultation



Low Impact:  
SEC Panel and SECAS.

What stage is this document in the process?

|    |                             |
|----|-----------------------------|
| 01 | Modification Proposal       |
| 02 | Initial Modification Report |
| 03 | Draft Modification Report   |
| 04 | Final Modification Report   |

SECMPO0020

Modification Proposal

3<sup>rd</sup> October 2016

Version 1.3

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## MODIFICATION PROPOSAL FORM V1.0

### 1. Proposer's Contact Details

#### Details of Proposer

|                 |                            |
|-----------------|----------------------------|
| Name:           | Graham Smith               |
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#### Representative as Point of Contact

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#### Details of Representative's Alternate

|                 |                            |
|-----------------|----------------------------|
| Name:           | Jacqui Barton              |
| Organisation:   | Western Power Distribution |
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## 2. Modification Proposal Details

Mod Submission Date: 3<sup>rd</sup> October 2016

Title of Mod Proposal: Removal of the confidential classification of the unique identifiers listed in SEC Schedule 5

### Description in Detail of the Proposed Modification:

This SEC Modification Proposal has been raised in order to enable and assist in the identification of organisations and SEC Parties through unique identifiers used within the UK energy market. For example, this Modification will enable organisations to identify Smart Metering Key Infrastructure (SMKI) Certificates and their associated organisations they are mapped against, as well as wider benefits. The Market Participant Identifiers (MPIDs) in which Network Operators and Suppliers are registered against within Market Domain Data (MDD) will assist in enabling organisations and SEC Parties to quickly identify Market Participants. Through discussions at various Smart Metering Implementation Programme (SMIP) forums, the easiest method of capturing MPID information is within the SEC Panel's ID Allocation Procedure excel spreadsheet, which is managed and maintained by the SEC Panel as and when is required.

SEC Schedule 5 – 'Accession Information' details the information required from Applicant's who wish to accede to the SEC, and become a SEC Party.

Currently in SEC Schedule 5 MPIDs, registered against Network Operators and Suppliers (referred to as unique identifiers in SEC Schedule 5), are treated as confidential, and as a result, cannot be disclosed on the SEC Website. Therefore, the information cannot be included in the ID Allocation Procedure excel spreadsheet.

There are three clauses in SEC Schedule 5 (clauses 13, 14 and 15) which specifically prohibit the publication of the unique identifiers provided both under the Master Registration Agreement (MRA) and the Uniform Network Code (UNC), as well as unique identifiers for a Meter Operator or a Meter Asset Manager for the Meter Point Administration Number (MPAN) or Meter Point Reference Number (MPRN) they are identified with, on the SEC Website.

Within each clause, there is legal wording in square brackets which states that the unique identifier under the MRA and/or the UNC shall be treated as confidential.

This Modification Proposal is seeking to remove "[*This information shall be treated as confidential and not disclosed on the Website.*]" from SEC Schedule 5 – Accession Information. Further information on the proposed changes to the SEC legal text are set out in Section 4.2 of this SEC Modification Proposal.

This will then mean that these unique identifiers are no longer treated as confidential information, and therefore, the information can be disclosed on the SEC Website and more specifically within the ID Allocation Procedure excel spreadsheet, which is published on the SEC Website and available to SEC Party Website users granted access to this information through the issuing of SEC Website user accounts. As the ID Allocation Procedure excel spreadsheet already contains a SEC Party (or an RDP), and their associated EUI-64 Compliant identifier range and SEC Party (or RDP) Signifier, the ID Allocation Procedure excel spreadsheet is deemed a suitable document to capture and store this additional information. The provision of such information will then further assist SEC Parties in identifying unique

identifiers to SEC Party identification references and associated information.

### 3. Path Type and Urgency Recommendation

Proposer's recommendations on Path Type (delete as appropriate)

Path 3

Statement for recommended Path Type:

It is proposed that this Modification is a Path 3: Self Governance Modification, as per SEC Section D2.7.

The justification for this is that the proposed changes are not material, as the unique identifier information under the MRA and the UNC is already known, published, and accessible to Applicants' that hold either an Energy Supply Licence, an Electricity Distribution Licence, a Gas Transport Licence, or is a Meter Operator, or a Meter Asset Manager via other sources.

Statement of whether Proposal is intended to be Fast-Track Modification (only Panel may raise this type of modification):

Not applicable, as this Modification does not meet the requirements to be a Fast-Track Modification Proposal.

Is the Proposal Urgent? (delete as appropriate)

No

Statement of whether Proposal should be treated as an Urgent Proposal:

Not applicable.

## 4. Modification Impact Assessment

### 4.1 SEC Objectives

| Facilitation of SEC Objectives                                                                                                                                                                                                                                                                                                                                                                                                  | Tick                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|
| <b>General SEC Objectives (C1.1)</b>                                                                                                                                                                                                                                                                                                                                                                                            |                                     |
| (a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain;                                                                                                                                                                                                           | <input type="checkbox"/>            |
| (b) the second General SEC Objective is to 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;                                                                                                                                                                                 | <input type="checkbox"/>            |
| (c) the third General SEC Objective is to 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;                                                                                                                                                                                                              | <input type="checkbox"/>            |
| (d) the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy;                                                                                                                                                                                                                                                       | <input type="checkbox"/>            |
| (e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy;                                                                                                                                                                                       | <input type="checkbox"/>            |
| (f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code;                                                                                                                                                                                                                                                                                     | <input type="checkbox"/>            |
| (g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.                                                                                                                                                                                                                                                                                            | <input checked="" type="checkbox"/> |
| <b>Transition Objective (X1.2)</b>                                                                                                                                                                                                                                                                                                                                                                                              |                                     |
| X1.2 The objective to be achieved pursuant to Section X: Transition is the efficient, economical, co-ordinated, timely, and secure process of transition to the Completion of Implementation.                                                                                                                                                                                                                                   | <input type="checkbox"/>            |
| <b>Charging Objectives (C1.3) (in respect of the Charging Methodology)</b>                                                                                                                                                                                                                                                                                                                                                      |                                     |
| C1.4 The First Relevant Policy Objective:                                                                                                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/>            |
| <p>(a) applies in relation to Smart Metering Systems installed (or to be installed) at Domestic Premises; and</p> <p>(b) requires the Charging Methodology to ensure that Charges (other than Charges for Elective Communication Services) in respect of such Smart Metering Systems do not distinguish (whether directly or indirectly) between Energy Consumers at Domestic Premises in different parts of Great Britain.</p> |                                     |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                          |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <p>C1.5 The Second Relevant Policy Objective is that, subject to compliance with the First Relevant Policy Objective, the Charging Methodology must result in Charges that:</p> <ul style="list-style-type: none"> <li>(c) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act;</li> <li>(d) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act;</li> <li>(e) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and</li> <li>(f) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.</li> </ul>                | <input type="checkbox"/> |
| <p>C1.6 The Third Relevant Policy Objective is that, subject to the Compliance with the First and Second Relevant Policy Objectives, the Charging Methodology must result in Charges that:</p> <ul style="list-style-type: none"> <li>a) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act;</li> <li>b) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act;</li> <li>c) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and</li> <li>d) (d) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.</li> </ul> | <input type="checkbox"/> |

Statement of how the proposed variation would better facilitate the achievement of the SEC Objectives:

This Modification Proposal will better facilitate General SEC Objectives (g), as it will enable the unique identifier information under the MRA and/or the UNC, as well as unique identifiers for a Meter Operator or a Meter Asset Manager for the Meter Point Administration Number (MPAN) or Meter Point Reference Number (MPRN) they are identified with, to be published on the SEC Website.

This, in turn, will enable SEC Parties to efficiently map unique identifier information to SEC Parties, once the information is able to be provided within the ID Allocation Procedure excel spreadsheet aiding SEC Party process

efficiency by enabling quicker identification of SEC Parties and organisations.

For example, it will enable a Supplier SEC Party to quickly identify the relevant Network SEC Party information, which in turn, will enable them to access the relevant SMKI Certificates which can be loaded onto a Device during Install and Commission.

## 4.2 Impacts

### Statement of impact on Greenhouse Gas Emission:

Greenhouse Gas Emissions will not be impacted by this Modification, as it is a non-material change to how information already available to an Applicant that holds either an Energy Supply Licence, an Electricity Distribution Licence, a Gas Transport Licence, or is a Meter Operator, or a Meter Asset Manager is treated.

### Statement of impact on which parts of the SEC would need amending (e.g. proposed legal drafting):

Only SEC Schedule 5 'Accession Information' of the SEC would require amendment in the following way:

#### SEC Schedule 5 – Accession Information

- 1 The Applicant's full name.
- 2 Whether the Applicant is a company or a natural person or a partnership etc.
- 3 The Applicant's jurisdiction of incorporation (if applicable).
- 4 The Applicant's registered number (if applicable).
- 5 The Applicant's registered address (or, if not applicable, its principal address).
- 6 Where the Applicant is incorporated or resident outside Great Britain, an address in Great Britain for the receipt of legal notices on the Applicant's behalf.
- 7 The Applicant's VAT registration number (if applicable).
- 8 The Applicant's address for invoices under the Code.
- 9 The Applicant's address or addresses for all other notices under the Code.
- 10 The Party Category into which the Applicant considers it will initially fall.
- 11 The Energy Licences held by the Applicant (including any for which it has applied).
- 12 Details of any Parties that are Affiliates of the Applicant (where the Applicant is a company).

- 13 Where the Applicant holds one or more Energy Supply Licences, details of the unique identifiers by which the Applicant is identified under the MRA or the UNC (as applicable) for the purposes of recording the Applicant's Registration for an MPAN or MPRN. ~~[This information shall be treated as confidential and not disclosed on the Website.]~~
- 14 Where the Applicant holds an Electricity Distribution Licence or a Gas Transporter Licence, details of the unique identifier by which the Applicant is identified under the MRA and/or the UNC (as applicable) for the purposes of recording the network to which an MPAN or MPRN relates. ~~[This information shall be treated as confidential and not disclosed on the Website.]~~
- 15 Where applicable, details of the unique identifiers by which the Applicant is identified Applicant's status as a Meter Operator or a Meter Asset Manager for an MPAN or MPRN. ~~[This information shall be treated as confidential and not disclosed on the Website.]~~
- 16 The name of the person or persons who will enter into the Accession Agreement on behalf of the Applicant.

This SEC Modification will amend how the unique identifiers provided both under the MRA and the UNC, as well as the unique identifiers for a Meter Operator or Meter Asset Manager, are treated, specifically, by no longer treating this information as confidential.

For the ID Allocation Procedure document, the following amendment is proposed:

In Section 5 – [SEC Obligation of the ID Allocation Procedure document](#):

#### **5.5 SEC Schedule 5 – Accession Information**

Clauses 13 to 15 of SEC Schedule 5 – Accession Information state that, where the Applicant holds one or more Energy Supply Licences, an Electricity Distribution Licence, or a Gas Transporter Licence, or a Meter Operator or a Meter Asset Manager, they must provide details of the unique identifier(s) under the MRA and/or the UNC. This unique identifier information shall be recorded and published within the ID Allocation Procedure excel spreadsheet, which provides the Party, DCC, or RDP ID(s), and corresponding Party and RDP Signifier(s).

As this excel Spreadsheet clearly shows SEC Party, DCC and RDP Names, as well as their corresponding User, DCC and RDP IDs, and their corresponding Party and RDP Signifier(s) that they have been allocated by the SEC Panel, a clear mapping procedure enables the unique identifier information under the MRA and/or the UNC, as well as unique identifiers for a Meter Operator or a Meter Asset Manager for the Meter Point Administration Number (MPAN) or Meter Point Reference Number (MPRN) they are identified with, to correspond to the correct SEC Party and published on the SEC Website.

As this excel Spreadsheet is maintained by the SEC Panel, unique identifier(s) under the MRA and/or the UNC, as well as unique identifiers for a Meter Operator or a Meter Asset Manager for the Meter Point Administration Number (MPAN) or Meter Point Reference Number (MPRN) they are identified with, for Applicants acceding to the SEC to be recorded and amended as and when is required.

**Please note that this amendment to the ID Allocation Procedure is provided for information and completeness**

**If this Modification Proposal is approved the above changes to the ID Allocation Procedure will be subject to amendment and approval (based on SEC Panel decision) via the governance process for the ID Allocation Procedure as set out in SEC Section B2.4.**

#### Statement of impact on likely changes to other Energy Codes:

This Modification Proposal will not impact any other industry Codes.

#### Statement of impact on likely Party Categories:

|                             |                          |                        |                          |
|-----------------------------|--------------------------|------------------------|--------------------------|
| Large Supplier Parties      | <input type="checkbox"/> | Small Supplier Parties | <input type="checkbox"/> |
| Electricity Network Parties | <input type="checkbox"/> | Gas Network Parties    | <input type="checkbox"/> |
| Other SEC Parties           | <input type="checkbox"/> |                        |                          |

It is expected that there should be no direct impact on SEC Parties, as the unique identifier information under the MRA and/or the UNC is already available to an Applicant that holds either an Energy Supply Licence, an Electricity Distribution Licence, a Gas Transport Licence, or is a Meter Operator, or a Meter Asset Manager and is provided as part of the accession process already.

#### Statement of impact on Consumers:

Consumers will not be impacted by this Modification, as it is a minor change to how the unique identifier(s) under the MRA and/or the UNC, as well as unique identifiers for a Meter Operator or a Meter Asset Manager for the Meter Point Administration Number (MPAN) or Meter Point Reference Number (MPRN) they are identified with, are treated under the SEC.

#### Statement of impact on Central Systems:

|                                                   |                          |                                                                |                          |
|---------------------------------------------------|--------------------------|----------------------------------------------------------------|--------------------------|
| DCC Systems                                       | <input type="checkbox"/> | User Systems                                                   | <input type="checkbox"/> |
| Smart Metering Systems and/or Communications Hubs | <input type="checkbox"/> | Other (i.e. on Smart Metering Key Infrastructure, or security) | <input type="checkbox"/> |

No Central System(s) will be impacted by this Modification Proposal, as it only changes how information already available to an Applicant that holds either an Energy Supply Licence, an Electricity Distribution Licence, a Gas Transport Licence, or is a Meter Operator, or a Meter Asset Manager is treated.

This modification will then enable the information to be published on the SEC Website, and more specifically and as requested by SEC Parties, recorded in the ID Allocation Procedure excel spreadsheet published on the SEC Website.

## 5. Proposed Timetable

### Proposed Timetable for Modification Proposal:

As this is a SEC Schedule 5 – Accession Information only change, it is proposed that the modification is implemented **5 Working Days** following the end of the 10 Working Days referral period set out in SEC Section D9.4(a), following the Change Board Vote on whether to approve or reject the Modification Proposal.

As this is a non-material change to SEC Schedule 5 – Accession Information that does not require any further refinement, this Modification should not require Refinement by a Working Group. With this in mind, the following progression timetable is proposed:

| Stage                                                 | Start                                                                                                                   | Finish                         |
|-------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| Modification Proposal Raised                          | 3 <sup>rd</sup> October 2016                                                                                            | N/A                            |
| Panel reviews Initial Modification Report             | 7 <sup>th</sup> October 2016                                                                                            | 14 <sup>th</sup> October 2016  |
| Modification Report Stage (15 WD Consultation Period) | 19 <sup>th</sup> October 2016                                                                                           | 9 <sup>th</sup> November 2016  |
| Change Board Vote                                     | 16 <sup>th</sup> November 2016                                                                                          | 23 <sup>rd</sup> November 2016 |
| Implementation                                        | 5 Working Days after the end of 10 WD referral period (estimated implementation date = 14 <sup>th</sup> December 2016). |                                |

Note, the timetable assumes progression as a Path 3: Self Governance Modification Proposal, and therefore does not include Authority Determination.

The amendment to the ID Allocation Procedure, that this Modification Proposal will enable, will require the SEC Panel to consider said change, and agree to issue the ID Allocation Procedure for consultation (in accordance with SEC Section B2.4). As the ID allocation Procedure is a document maintained by the SEC Panel, this element of the Modification Proposal **does not need to follow the SEC Modification Process**. It is anticipated that, following this Modification Proposal being agreed, a paper shall be submitted by SECAS to the SEC Panel which sets out the proposed change(s) to the ID Allocation Procedure, and seek that the SEC Panel agree to consult said change(s) in accordance with SEC Section B2.4.

## 6. Additional Information

Additional information:

None.

## APPENDIX 1: Glossary of Terms

The table below illustrates useful definitions of the terms used in this form. If you require any further information please contact the [SECAS Helpdesk](#).

| Term                     | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| DCC Systems              | Means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code (Section A1, SEC Stage 3.0).<br><br>The Proposer may wish to consider anticipated impacts on the DCC Licensee's enterprise systems (e.g. billing) or the Data Service Provider or Communications Service Providers.                                                                                                                                                                                                                                                                                                                                              |
| Fast-Track Modifications | Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| General SEC Objectives   | Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0).<br><br>The SEC Objectives are those objectives that the SEC has been designed to achieve.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Greenhouse Gas Emission  | Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Other Systems            | Other systems identified in the section Statement of Impact on Central Systems.<br><br>The Proposer may wish to consider Prepayment vendors, Electricity Central Online Enquire Service (ECOES), Single Centralised Online Gas Enquiry Service (SCOGES), BSC Settlement Systems, etc.                                                                                                                                                                                                                                                                                                                                                                                            |
| Path Type                | Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: <ul style="list-style-type: none"> <li>• <b>Path 1 Modifications: Authority-led</b> (Section D2.4/D2.5, SEC Stage 3.0)</li> <li>• <b>Path 2 Modifications: Authority Determination</b> (Section D2.6, SEC Stage 3.0)</li> <li>• <b>Path 3 Modifications: Self-Governance</b> (Section D2.7, SEC Stage 3.0)</li> <li>• <b>Path 4 Modifications: Fast-Track Modifications</b> (Section D2.8, SEC Stage 3.0)</li> </ul> |

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Modification Proposal

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|                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Party Category         | <p>Means one of the following categories:</p> <ul style="list-style-type: none"> <li>(a) the Large Supplier Parties collectively;</li> <li>(b) the Small Supplier Parties collectively;</li> <li>(c) the Electricity Network Parties collectively;</li> <li>(d) the Gas Network Parties collectively; or</li> <li>(e) the Other Sec Parties collectively.</li> </ul> <p>(Section A1, SEC Stage 3.0).</p>                                                                                                                                                                                                                                                                                                                                                                                             |
| Smart Metering Systems | <p>Means a system installed at premises for the purposes of the Supply of Energy to the premises that, on the date it is installed, as a minimum;</p> <ul style="list-style-type: none"> <li>(a) consists of the apparatus identified in;</li> <li>(b) has the functional capability specified by; and</li> <li>(c) complies with the other requirements of,</li> </ul> <p>the Smart Metering Equipment Technical Specification that is applicable at the date (Section A1, SEC Stage 3.0).</p> <p>In summary, this includes:</p> <ul style="list-style-type: none"> <li>• Gas Smart Metering Equipment;</li> <li>• Electricity Smart Metering Equipment;</li> <li>• In Home Display;</li> <li>• Prepayment Interface Device; and</li> <li>• HAN Connected Auxiliary Load Control Switch.</li> </ul> |
| Urgent Proposal        | <p>Means a Modification Proposal deemed an Urgent Proposal where the Authority directs the Panel to treat the Modification Proposal as an urgent Proposal (whether following a referral by the Panel pursuant to Section D4.5, or at the Authority's own initiation) (Section D4.5/D4.6, SEC Stage 3.0).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| User Systems           | <p>Means, in respect of each User (DCC User), the Systems of that User (including, where relevant, those of its Supplier Nominated Agent) used in relation to the Services and/or Smart Metering Systems (Section A1, SEC Stage 3.0).</p> <p>The Proposer may wish to consider Suppliers; Network Operators; Registration Data Providers; Other DCC Users (e.g. Authorised Third Parties / Switching Sites); Supplier Nominated Agents.</p>                                                                                                                                                                                                                                                                                                                                                          |