

This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Paper Reference:	SECP_107_1208_15
Action:	For Discussion
Acronyms and Defined Terms SEC Glossary	

SEC Change Update Report – August 2022

1. Purpose

This document provides an update on the progress of Smart Energy Code (SEC) Modifications and Releases and the recent and upcoming decisions of the Change Sub-Committee (CSC) under delegated authority from the Panel.

The Data Communications Company's (DCC's) performance report on Preliminary Assessments and Impact Assessments is included as Appendix A to this report.

2. Recommendations

The Panel is requested to:

- **NOTE** the contents of this report; and
- **PROVIDE** views and feedback on the modifications raised in section 2.

David Kemp

SECAS Team

5 August 2022

Attachments:

- **Appendix A:** DCC Assessments Performance Report

1. Overview

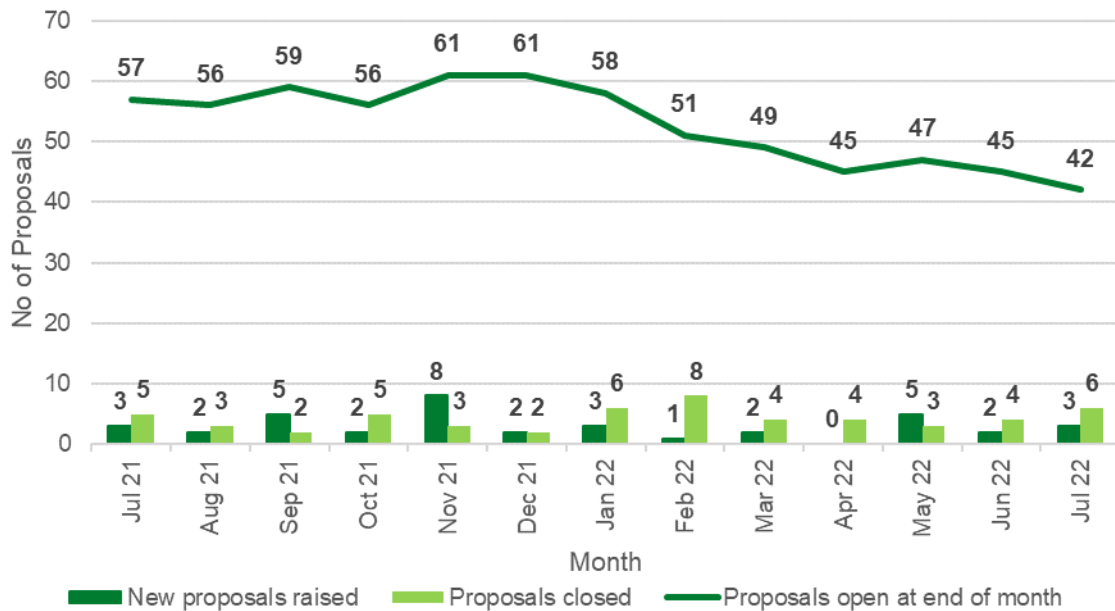
This information is correct as at the end of July 2022.

More detailed information can be found in the [Modification Register](#).

Proposals currently in each stage



Volume of proposals going through the modification framework



Modification progression timescales

Modification timescales		
Status	Total	Average duration
Proposals open (pre-decision)	42	388 WD
Proposals concluded in the last 12 months	50	352 WD
<i>DCC System impacting modifications decided upon</i>	10	593 WD
<i>Non-DCC System impacting modifications decided upon</i>	22	147 WD
<i>Proposals withdrawn</i>	18	457 WD

2. Panel input on modifications

We seek the Panel's views and input on the following modifications:

MP134B

[MP134A 'Use of SMKI Certificates relating to a SoLR event'](#) implemented the authority for the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) to delay revocation of SMKI Certificates during a Supplier of Last Resort (SoLR) event to allow a more managed transfer of responsibilities and ensure consumers are not adversely affected. However, the current solution is manual and is reliant on the SMKI PMA Chair approving any delays. This makes that role a potential single point of failure in the process should the Chair be unavailable or uncontactable at the relevant time (which may be overnight or over the weekend). The Security Sub-Committee (SSC) has also stated that the current solution does not hold with the security trust model and a systems-based solution should be implemented.

A systems-based solution has been designed by SECAS, the Department for Business, Energy and Industrial Strategy (BEIS) and the DCC and assessed under [MP134B 'Use of SMKI Certificates relating to a SoLR event - Part 2'](#). The Preliminary Assessment has quoted an implementation cost of between £632,500 and £1,082,500 up to the end of Pre-Integration Testing (PIT). Refinement Consultation and Working Group feedback has also been unfavourable, with the key comments raised being:

- The DCC costs are high for a solution that is unlikely to be used. Only one Supplier has undergone a disorderly exit in the last 18 months, which did not have any Prepayment Customers.
- The solution would require Shared Resource Providers (SRPs) to make significant changes to their business infrastructure, with high costs that would be passed on to Suppliers and subsequently to consumers.
- Service Request (SR) 1.6 'Update Payment Mode' would confuse consumers, with respondents preferring to have a non-disablement calendar instead. We have requested a second Preliminary Assessment to address this, but this has resulted in increased costs quoted due to the more complex nature of SR 2.2 'Update Prepay Config'.

While noting these views from Parties, we understand there is appetite from BEIS for this change to be delivered. We therefore believe that the Panel and SSC Chairs should discuss this change and the feedback received with BEIS and consider the appropriate way forward for this. To support this discussion, we seek views and feedback from the Panel on the solution and the business case for this proposed systems change.

Potential new Draft Proposal on SEC cost allocation

We previously presented a paper to the SECCo Board investigating how much work is generated by Other Users. This followed comments by the Panel Finance and Contracts Sub-Group (PFCG) that Other Users have access to DCC Services but are not charged for these, as the User Role is not recognised as a Charging Group in SEC Section K 'Charging Methodology'. The Board agreed that SECAS should investigate option for charging Other Users. We have been seeking an appropriate

Proposer to initiate a Draft Proposal to take this work forward and further investigate and develop the problem statement.

We consider this would be best raised by the DCC, as it is the recipient of the charges. As such, it would not be overly concerned from whom it received payments from and would not see any net benefits or disbenefits arising from any re-apportionment of charges. Additionally, the DCC has obligations to ensure that the apportionment of charges “*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*” (SEC Section C1.6(d)). We consider this would be an appropriate time to review if this remains the case. While another User could raise this change, and we have received interest from at least one Supplier organisation willing to do so, we believe this could result in the perception of such a Proposer seeking to make changes for their own benefit, which could impact on the development of any solution.

We also consider that this work should be widened to cover all Users, not just Other Users, noting the concerns that have been raised under [MP162 ‘SEC changes required to deliver MHHS’](#) related to the proposed new Meter Data Retriever (MDR) User Role. Concerns have been raised around the Fixed Charges in SEC Section K, which is where the DCC costs for delivering modifications are recouped through, only being allocated to Suppliers and Network Parties. We consider this Draft Proposal would be an appropriate place to holistically review the current SEC charging arrangements.

We are seeking the Panel’s support for the DCC to be the Proposer for this Draft Proposal.

3. Change Sub-Committee decisions

Recent decisions

The CSC met once in the last month, on 19 July 2022.

The CSC approved the following Modification Reports for progression to final decision:

- [MP102B ‘Power Outage Alerts triggered by an OTA firmware upgrade - enduring solution’](#)
- [MP125 ‘Correcting Device Information for the ESME Variant’](#)

The CSC reviewed three new Draft Proposals and determined further work was required before they could proceed further:

- [DP210 ‘RSA forecasts, orders and pay stock charges for Alt HAN Equipment’](#)
- [DP211 ‘Aligning the SMI with the CPL’](#)
- [DP212 ‘Housekeeping changes 2022’](#)

Upcoming decisions

The next CSC meeting will be on 16 August 2022.

Currently, we expect to ask the CSC to approve the following Modification Reports for progression to final decision:

- [MP176 'Customer Analytics Reporting'](#) – this modification is proposing to provide a standardised set of benchmarked reporting to all DCC Users. This will enable them to identify their performance for key business processes in comparison to their peers. They will also be able to diagnose reasons for poor performance so that they can take steps to address it. The DCC's implementation costs will be £139,320, with no additional costs anticipated on Parties to deliver this.
- [DP212 'Housekeeping changes 2022'](#) – this modification is seeking to implement a series of non-material housekeeping changes across a range of SEC documents, and the legal text has been published on our website for Parties to comment on. Implementation costs would be limited to SECAS time and effort to update the SEC. We will be asking the CSC to approve this modification as a Fast-Track Modification.

We expect to ask the CSC to convert the following Draft Proposals to Modification Proposals for progression to the Refinement Process:

- [DP205 'Updating terminology to align with the NCSC'](#)
- [DP206 'Allowing Generation Licence Holders to Apply Export MPANs'](#)
- [DP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#)
- [DP210 'RSA forecasts, orders and pay stock charges for Alt HAN Equipment'](#)
- [DP211 'Aligning the SMI with the CPL'](#)

Other new Draft Proposals may be raised nearer to the CSC meeting that could potentially be progressed to the Refinement Process or the Report Phase immediately.

We will also be asking the CSC to baseline the full scope of the February 2022 SEC Release.

4. New Draft Proposals

The following new Draft Proposals have been raised since the last Panel meeting:

DP210

[DP210 'RSA forecasts, orders and pay stock charges for Alt HAN Equipment'](#) was raised by SMS Plc on 8 July 2022.

The SEC currently restricts Alternative Home Area Network (Alt HAN) equipment forecasting and ordering to 'Relevant Supplier Parties' (Small and Large Suppliers) only. Registered Supplier Agents (RSAs) such as Metering Equipment Managers (MEMs) can install Smart Metering Equipment on Suppliers' behalf, and so not including them within SEC Section Z4.36 will inhibit the rollout of Alt HAN equipment.

DP211

[DP211 'Aligning the SMI with the CPL'](#) was raised by the SSC on 12 July 2022.

The SEC has a security objective to cater for Devices that do not have a matching Device Model on the Central Products List (CPL) to be prevented from communicating with the DCC. However, at present the SEC only caters for Devices being suspended if the Device Model has been removed from the CPL.

DP212

[DP212 'Housekeeping changes 2022'](#) was raised by the DCC on 12 July 2022.

Some of the errors on SECAS's housekeeping log have not been addressed despite being logged for several years. This is because either a modification which makes changes to the relevant section has never been raised or because a modification which the housekeeping changes were include in has been rejected or withdrawn, leading to the housekeeping issues not being addressed.

5. DCC Assessments

DCC Impact Assessment requests

No DCC Impact Assessment requests were presented to the Change Board for approval in July 2022.

DCC Assessment timescales

The timescales below cover the 12-month period up to the end of July 2022.

More information is available in the DCC's update in Appendix A.

[MP186 'Section D Review \(2020\): further enhancements'](#) is proposing the target duration for Preliminary Assessments be increased from 15 Working Days (WD) to 25WD. Durations marked in amber in the tables below missed the current 15WD target but would have met the proposed 25WD target.

DCC Assessment timescales		
Assessment	Total	Average duration
Preliminary Assessments open	2	28 WD
Preliminary Assessments completed in the last 12 months	17	24 WD
Impact Assessments open	0	- WD
Impact Assessments completed in the last 12 months	11	65 WD

DCC Assessments currently underway				
Modification	Type	Accepted	Target duration	Current duration
MP168	PA	18 May 22	15 WD	53 WD

Managed by

DCC Assessments currently underway				
Modification	Type	Accepted	Target duration	Current duration
SECMP0028	PA	27 Jul 22	15 WD	3 WD

DCC Preliminary Assessments completed in the last 12 months				
Modification	Type	Returned	Target duration	Actual duration
MP128	PA	10 Aug 21	15 WD	22 WD
MP129	PA	25 Aug 21	15 WD	29 WD
MP125	PA	1 Sep 21	15 WD	13 WD
MP162	PA	17 Sep 21	15 WD	18 WD
MP170	PA	30 Sep 21	15 WD	30 WD
MP134B	PA	11 Oct 21	15 WD	39 WD
MP143	PA	29 Oct 21	15 WD	2 WD
MP166	PA	16 Nov 21	15 WD	44 WD
MP102B	PA	15 Nov 21	15 WD	17 WD
MP176	PA	10 Dec 21	15 WD	12 WD
MP181	PA	17 Jan 22	15 WD	19 WD
MP194	PA	17 Jan 22	15 WD	23 WD
MP187	PA	20 Jan 22	15 WD	22 WD
MP137	PA	27 May 22	15 WD	15 WD
MP172	PA	13 Jun 22	15 WD	28 WD
MP155	PA	15 Jun 22	15 WD	60 WD
MP134B	PA	14 Jul 22	15 WD	19 WD

DCC Impact Assessments completed in the last 12 months				
Modification	Type	Returned	Target duration	Actual duration
MP141	IA	1 Oct 21	40 WD	67 WD
MP078	IA	18 Nov 21	40 WD	139 WD
MP140	IA	16 Dec 21	40 WD	121 WD
MP128	IA	28 Feb 22	40 WD	50 WD
MP162	IA	7 Mar 22	40 WD	45 WD
MP143	IA	9 Mar 22	40 WD	29 WD
MP125	IA	14 Mar 22	40 WD	48 WD
MP170	IA	25 May 22	40 WD	78 WD
MP102B	IA	27 May 22	40 WD	41 WD
MP176	IA	1 Jun 22	40 WD	25 WD

DCC Impact Assessments completed in the last 12 months				
Modification	Type	Returned	Target duration	Actual duration
MP122B	IA	11 Jul 22	40 WD	70 WD

6. Modification outcomes

Change Board votes

The Change Board voted on the following modifications on 27 July 2022:

- [MP128A 'Gas Network Operators SMKI Requirements'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a)¹
- [MP160 'Certificate Signing Request forecasting'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a) and (b)²
- [MP162 'SEC changes required to deliver MHHS'](#) – recommended the Authority rejects on the basis it would not better facilitate the SEC Objectives
- [MP181 'Meter Asset Provider and Device Manufacturer access to asset related data held by the DCC'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a) and (c)³
- [MP186 'Section D Review \(2020\): further enhancements'](#) – recommended the Authority approves on the basis it would better facilitate SEC Objective (g)⁴
- [MP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a)
- [MP209 'Lifetime CPA Certificates'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a) and (f)⁵

Authority decisions

The Authority has issued no decisions since the last Panel meeting.

The following modifications are currently with the Authority for decision:

- [MP162 'SEC changes required to deliver MHHS'](#)

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

² 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

³ 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

⁴ Facilitate the efficient and transparent administration and implementation of this Code

⁵ Ensure the protection of Data and the security of Data and Systems in the operation of this Code

- [MP186 'Section D Review \(2020\): further enhancements'](#)

Withdrawn proposals

The following modification has been withdrawn since the last Panel meeting:

- [MP082 '2.4GHz Channel Management'](#)

7. Releases and Designations

SEC versions issued

The following SEC versions were released in July 2022:

SEC versions issued in the last month		
Version	Date	Key changes
62.0	18 Jul 22	Updates to 11 SEC Sections and Appendices to implement MP200 'Faster Switching consequential changes to the SEC'

Upcoming SEC Release scopes

November 2022 SEC Release – 3 November 2022		
Modification	DCC System impacts?	Status
SECMP0015 'GPF timestamp for reading instantaneous Gas values'	✓	Approved
SECMP0056 'IHD / PPMID Zigbee Attributes Available on the HAN'	✓	Approved
MP085A 'Synchronisation of smart meter voltage measurement periods'		Approved
MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4'	✓	Approved
MP109 'ADT and Exit Quarantine file delivery mechanism'		Approved
MP129 'Allowing the use of CNSA variant for ECDSA'		Targeted
MP140 'CH Stock Transfer'	✓	Approved
MP141 'SRV Visibility for Devices on SSI'	✓	Approved
MP143 'Incorporating IRPs into GBCS v3 series'	✓	Approved
MP160 'Certificate Signing Request forecasting'		Approved
MP181 'Meter Asset Provider and Device Manufacturer access to asset related data held by the DCC'		Approved
MP186 'Section D Review (2020): further enhancements'		Targeted

November 2022 SEC Release – 3 November 2022		
Modification	DCC System impacts?	Status
MP193 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 6'		Approved
MP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'		Approved
DP212 'Housekeeping changes 2022'		Targeted

February 2023 SEC Release – 23 February 2023		
Modification	DCC System impacts?	Status
MP167 'Review of SEC documents'		Targeted
MP187 'Incorporation of Target Round Trip Times and Target Success Rates into the SEC'		Targeted
MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set'		Targeted
MP203 'Security Assurance of Device Triage Facilities'		Targeted
DP210 'RSA forecasts, orders and pay stock charges for Alt HAN Equipment'		Targeted

June 2023 SEC Release – 29 June 2023		
Modification	DCC System impacts?	Status
MP102B 'Power Outage Alerts triggered by an OTA firmware upgrade - enduring solution'	✓	Targeted
MP122B 'Operational Metrics – Part 2'	✓	Targeted
MP125 'Correcting Device Information for the ESME Variant'	✓	Targeted
MP128A 'Gas Network Operators SMKI Requirements'		Approved
MP134B 'Use of SMKI Certificates relating to a SoLR event - Part 2'	✓	Targeted

November 2023 SEC Release – 2 November 2023		
Modification	DCC System impacts?	Status
No modifications are currently targeted for this release		

February 2024 SEC Release – 29 February 2024		
Modification	DCC System impacts?	Status
MP162 'SEC changes required to deliver MHHS'	✓	Targeted

Ad-hoc SEC Releases			
Modification	Date	DCC System impacts?	Status
MP209 'Lifetime CPA Certificates'	1 Aug 22		Approved
MP096 'DNO Power Outage Alerts'	10WD after decision		Targeted

8. Cross-Code working

Code Administration Code of Practice (CACoP) update

The latest CACoP Forum meeting was held on 12 July 2022. At the meeting, members discussed an initiative to introduce 'principle-based guidance' for modification Proposers across the Codes, so that while the guidance itself may differ, all Code users are aware of and contributing towards the same key principles. There is an action on all members to provide their views on what these principles should be.

Members continued to impact assess the proposal to align modification release dates across the Codes. This represents a major step toward achieving one of the main goals in the CACoP Forum's Forward Work Plan for 2022.

The CACoP Forum provided feedback to Ofgem on the most recent Code Administrator customer satisfaction survey. It discussed the topics and metrics that should be recommended for use in any future surveys to be of most value to all Codes and therefore their customers. SECAS is leading on compiling this information to form a 'CACoP guidance' which future surveys, whether conducted by third parties or by the Code Administrators independently, can draw from.

An Ofgem representative provided an update on Ofgem's intention to continue with the 'expected decision date' approach to Authority Determined Modifications that it has been trialling and requested feedback from the Forum. The Forum's consensus was that a return to the previous approach of a 25 Working Day key performance indicator (KPI) for delivery of a decision would make it easier for Code Administrators to target specific release dates, even if these were only rough indicators. The Ofgem representative noted the Forum's feedback and will take this back for consideration.

Cross Code Steering Group (CCSG) update

The CCSG met face to face for the first time since January 2022 to review how the 'virtual' ways of working were benefiting Parties and if changes were necessary. The CCSG agreed that a short call or face to face meeting would be beneficial once a month to check understanding of proposed changes and modifications across Codes. These meetings will recommence from September 2022.

In the last month no modifications or change proposals were highlighted on the Retail Energy Code (REC) Portal as having cross-Code impacts by other Codes. In terms of SEC changes impacting other Codes, no impacts have been identified from new Draft Proposals in the last month.