

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_108_1609_18
Action:	For Discussion
Acronyms and Defined Terms SEC Glossary	

SEC Change Update Report – September 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

9 September 2022

Attachments:

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

1. Overview

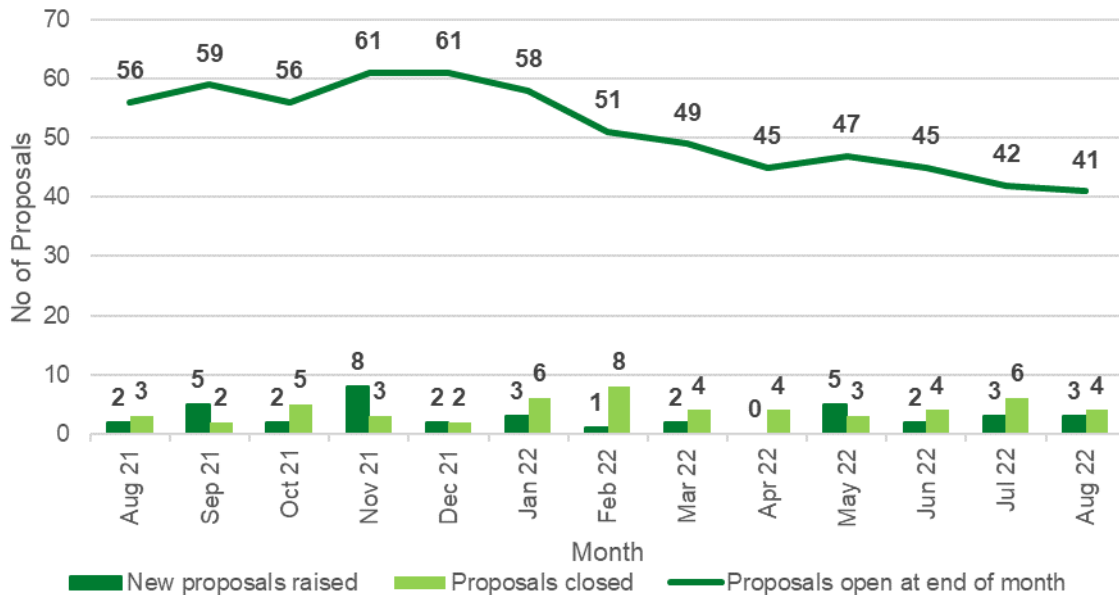
This information is correct as at the end of August 2022.

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

Number of proposals in each stage of the modification framework



Volume of proposals going through the modification framework



Modification progression timescales

Modification timescales		
Status	Total	Average duration
Proposals open (pre-decision)	41	367 WD
Proposals concluded in the last 12 months	51	350 WD
<i>DCC System impacting modifications decided upon</i>	10	552 WD
<i>Non-DCC System impacting modifications decided upon</i>	22	146 WD
<i>Proposals withdrawn</i>	19	480 WD

2. Modification updates

MP162

The Authority determined to send back [MP162 'SEC changes required to deliver MHHS'](#) on 5 September 2022. In its [letter](#) the Authority considered it could not make a fully informed decision without additional information. It has therefore requested an analysis of the costs of the technical implementation of the Meter Data Retriever (MDR) User Role only, without any additional costs resulting from the broader implementation of market-wide half-hourly settlement (MHHS) that are not impacted by the implementation of the MDR role. It has requested the updated Modification Report be returned to it by 31 October 2022.

Separately, [the Authority has directed the DCC to commence work on the capacity changes needed to deliver MHHS](#). The Authority has directed the DCC to undertake additional analysis to identify and plan the delivery of the system capacity needed to deliver the requirements of the target operating model (TOM) and to provide it with a recommendation of the most suitable approach and the associated costs.

We are liaising with the DCC to update the MP162 DCC Impact Assessment to include only the costs and impacts of delivering the MDR User Role. We are also developing the timetable and way forward for responding to the Authority's direction. We will seek the views and input of the Panel on this send-back and the way forward for MP162 at the meeting. We also plan to engage the CSC on this send-back on 20 September 2022 through the responsibilities for setting modification timetables delegated to it by the Panel.

MP208

[MP208 'Northbound Prioritisation of N56 Alerts'](#) is seeking to resolve an issue where payments are being taken for Prepayment top-ups but not credited to the meter. When a consumer requests a Prepayment top-up at a shop, the request is sent via the Responsible Supplier to the DCC. The DCC responds by sending an N56 Alert, which contains the Unique Transaction Reference Number (UTRN) required to process the consumer's payment. If the UTRN is not returned to the shop within 30 seconds of the initial request, the transaction will time out and the consumer's funds may be held by the Payment Service Provider (PSP) until a refund is processed. While the majority of Prepayment top-up requests are processed and N56 Alerts returned to the Supplier within the necessary timeframe of 16 seconds, there are instances where this part of the process is taking too long.

We and the Proposer have agreed to begin developing a Proposed Solution for this modification. This follows discussions with the DCC regarding its ongoing internal investigations into the source of the delays to the processing of N56 Alerts. Business requirements have been drafted and will be discussed with the Working Group and relevant Sub-Committees in October 2022.

MP134B

We highlighted [MP134B 'Use of SMKI Certificates relating to a SoLR event - Part 2'](#) to the Panel last month, highlighting the concerns that had been raised by Parties around the proposed enduring solution. The Panel Chair and the Security Sub-Committee (SSC)/Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) Chair have since met to discuss these concerns.

The Chairs recognised that, to date, the current arrangements for Supplier of Last Resort (SoLR) events, where the SMKI PMA Chair co-ordinates and agrees the process for protecting pre-payment customers and the transfer of the customers of failed Suppliers to the appointed SoLR Supplier, had worked well and cost effectively. Further, they noted that due to the excessive costs of a systems-based solution both from a central systems perspective and the additional costs that this solution would incur with Shared Resource Providers (SRPs), there is little SEC Party support through the modification process for the currently proposed solution. The Panel and SSC/SMKI PMA Chairs agreed the proposed systems-based solution was not a cost-effective solution for the rare event of a disorderly exit from the market.

There has been concern raised regarding the potential unavailability of the SMKI PMA Chair for the current approach, albeit this event has not occurred to date. The Chairs noted that if this event were to arise, the SMKI PMA Alternate Chair or the Panel Chair could step in to oversee the current procedural process. They noted that in this event, improved communication would need to be implemented with those Ofgem staff making the arrangements for the appointment of the SoLR.

The SSC/SMKI PMA Chair agreed to discuss issues relating to the concerns raised by the SSC at a future SSC meeting, and the Panel Chair agreed to discuss this matter with Ofgem.

Upcoming Draft Proposal to review the SEC charging methodology

Following the last Panel meeting, we have liaised with the DCC regarding raising the Draft Proposal to take forward the review of how SEC costs are allocated. The DCC has agreed to be the Proposer for this Draft Proposal, and we are working with it to raise this in time for discussion at the September 2022 CSC meeting.

3. Change Sub-Committee decisions

Recent decisions

The CSC met once in the last month, on 16 August 2022.

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

- [DP212 'Housekeeping changes 2022'](#) – the CSC disagreed with approving this change as a Fast-Track Modification, considering there to be benefit in the changes being consulted upon via a Modification Report Consultation prior to decision. It therefore determined to progress MP212 directly to the Report Phase as a Self-Governance Modification.

The CSC approved the following Draft Proposals to be converted to Modification Proposals and progressed to the Refinement Process:

- [DP205 'Updating terminology to align with the NCSC'](#)
- [DP207 'Allowing Registered Supplier Agents to Maintain Meter Firmware'](#) – the CSC agreed this Draft Proposal be progressed with the request that the Proposer and the Working Group consider whether the solution should be expanded to include all the roles that could need to maintain firmware, such as Meter Asset Providers (MAPs) and meter manufacturers.

- [DP210 'RSA forecasts, orders and pay stock charges for Alt HAN Equipment'](#)
- [DP211 'Aligning the SMI with the CPL'](#) – the CSC agreed to progress this forward as a modification but requested SECAS expedite its progression as much as it could. The CSC also agreed the SSC should act as the Working Group for this modification and requested transparent updates on its discussions be made available.
- [DP213 'Updating MPxN in the Smart Metering Inventory'](#)

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

- [DP214 'Clarification of Acceptable DCC User IDs for Import and Export Suppliers'](#)
- [DP215 'Communications Hub Ordering and Forecasting'](#)

The CSC also baselined the full scope of the February 2022 SEC Release. The CSC noted [MP203 'Security Assurance of Device Triage Facilities'](#) had been moved from the November 2022 SEC Release to the February 2023 SEC Release due to delays with the review of the legal text by the SSC and the NCSC. It requested SECAS investigate how this change could still be delivered in the November 2022 SEC Release. We have developed an expedited timetable for this modification that would allow for the Change Board vote to take place in October 2022 assuming no issues arise during consultation. We will seek the CSC's approval of this approach at the September 2022 CSC meeting. We will also consult on having an ad-hoc release as a fall-back implementation date if MP203 cannot be approved in time for inclusion in the November 2022 SEC Release.

Upcoming decisions

The next CSC meeting will be on 20 September 2022.

Currently, we don't expect to ask the CSC to approve any Modification Reports for progression to final decision.

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

- [DP214 'Clarification of Acceptable DCC User IDs for Import and Export Suppliers'](#)
- [DP215 'Communications Hub Ordering and Forecasting'](#)

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.

The DCC will also be presenting the actual costs of the June 2022 SEC Release for information.

4. New Draft Proposals

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

DP213

[DP213 'Updating MPxN in the Smart Metering Inventory'](#) was raised by the DCC on 9 August 2022.

Currently, if a SEC Party identifies an issue with the data held within the Smart Metering Inventory (SMI), it must raise a Service Request (SR) 8.4 to resolve the issue identified. If the SR 8.4 is unsuccessful, then the Party must raise an incident ticket via the Self-Service Interface (SSI). This incident ticket notifies the DCC Service Centre, which will then take the necessary steps to track and remedy the data issue following the procedure in SEC Appendix AG 'Incident Management Policy'. These require multiple people to work on resolving tasks in a linear process until all tasks are complete, at which point the incident can be marked as 'resolved'.

DP214

[DP214 'Clarification of Acceptable DCC User IDs for Import and Export Suppliers'](#) was raised by the DCC on 9 August 2022.

SEC Section H 'DCC Services' states that when a Party wishes to register in the 'Import Supplier', 'Export Supplier' and 'Gas Supplier' User Roles, it can use the same ID number for each Role. However, the wording excludes a Party from using the same ID number for 'Import Supplier' and 'Export Supplier' unless it also intends to act as 'Gas Supplier'. The Proposer believes that the SEC is unnecessarily exclusionary on this point.

DP215

[DP215 'Communications Hub Ordering and Forecasting'](#) was raised by the DCC on 9 August 2022.

The Proposer believes that the current SEC requirements for the forecasting and ordering of Communications Hubs are causing difficulties for the Communications Service Providers (CSPs), as the length of time and the level of variance between submission of forecasts and delivery of Devices do not provide sufficient certainty for the successful procurement and provision of the required Device quantities.

5. DCC Assessments

DCC Impact Assessment requests

The Change Board approved the following Impact Assessment request on 24 August 2022:

- [MP176 'Customer Analytics Reporting'](#) (Alternative Solution)

DCC Assessment timescales

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

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

DCC Assessment timescales		
Assessment	Total	Average duration
Preliminary Assessments open	1	76 WD
Preliminary Assessments completed in the last 12 months	16	23 WD
Impact Assessments open	0	- WD
Impact Assessments completed in the last 12 months	11	65 WD

DCC Preliminary Assessments

[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 Preliminary Assessments currently underway			
Modification	Accepted	Target duration	Current duration
MP168	18 May 22	15 WD	76 WD

DCC Preliminary Assessments completed in the last 12 months			
Modification	Returned	Target duration	Actual duration
MP125	1 Sep 21	15 WD	13 WD
MP162	17 Sep 21	15 WD	18 WD
MP170	30 Sep 21	15 WD	30 WD
MP134B	11 Oct 21	15 WD	39 WD
MP143	29 Oct 21	15 WD	2 WD
MP166	16 Nov 21	15 WD	44 WD
MP102B	15 Nov 21	15 WD	17 WD
MP176	10 Dec 21	15 WD	12 WD
MP181	17 Jan 22	15 WD	19 WD
MP194	17 Jan 22	15 WD	23 WD
MP187	20 Jan 22	15 WD	22 WD
MP137	27 May 22	15 WD	15 WD
MP172	13 Jun 22	15 WD	28 WD
MP155	15 Jun 22	15 WD	60 WD
MP134B	14 Jul 22	15 WD	19 WD
SECMP0028	23 Aug 22	15 WD	20 WD

DCC Impact Assessments

DCC Impact Assessments currently underway			
Modification	Accepted	Target duration	Current duration
None currently underway	-	-	-

DCC Impact Assessments completed in the last 12 months			
Modification	Returned	Target duration	Actual duration
MP141	1 Oct 21	40 WD	67 WD
MP078	18 Nov 21	40 WD	139 WD
MP140	16 Dec 21	40 WD	121 WD
MP128	28 Feb 22	40 WD	50 WD
MP162	7 Mar 22	40 WD	45 WD
MP143	9 Mar 22	40 WD	29 WD
MP125	14 Mar 22	40 WD	48 WD
MP170	25 May 22	40 WD	78 WD
MP102B	27 May 22	40 WD	41 WD
MP176	1 Jun 22	40 WD	25 WD
MP122B	11 Jul 22	40 WD	70 WD

6. Modification outcomes

Change Board votes

The Change Board voted on the following modifications on 24 August 2022:

- [MP096 'DNO Power Outage Alerts'](#) – recommended the Authority approves on the basis it would better facilitate SEC Objectives (b)¹ and (g)²
- [MP102B 'Power Outage Alerts triggered by an OTA firmware upgrade - enduring solution'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a)³
- [MP125 'Correcting Device Information for the ESME Variant'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a)

¹ 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

² Facilitate the efficient and transparent administration and implementation of this Code

³ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

Authority decisions

The Authority has issued the following decision since the last Panel meeting:

- [MP162 'SEC changes required to deliver MHHS'](#) – the Authority has sent this back for further analysis (see Section 2 for further details)

The following modifications are currently with the Authority for decision:

- [MP096 'DNO Power Outage Alerts'](#)
- [MP186 'Section D Review \(2020\): further enhancements'](#)

Withdrawn proposals

The following modifications have been withdrawn since the last Panel meeting:

- [MP113 'Unintended Data Disclosure when using SR8.2'](#)
- [MP170 'Firmware updates to Point to Point Alt HAN Devices'](#)
- [DP190 'Standard Event and Alert Screens on SMETS2 Meters'](#)

7. Releases and Designations

SEC versions issued

The following SEC versions were released in August 2022:

SEC versions issued in the last month		
Version	Date	Key changes
63.0	1 Aug 22	Updates to SEC Section F and SEC Appendix Z to implement MP209 'Lifetime CPA Certificates'

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

November 2022 SEC Release – 3 November 2022		
Modification	DCC System impacts?	Status
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
MP193 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 6'		Approved
MP203 'Security Assurance of Device Triage Facilities'		Targeted
MP204 'Incorporation of Category 3 Issue Resolution Proposals into the SEC – Batch 8'		Approved
MP212 'Housekeeping changes 2022'		Targeted

February 2023 SEC Release – 23 February 2023		
Modification	DCC System impacts?	Status
MP167 'Review of SEC documents'		Targeted
MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'		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
MP210 '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'	✓	Approved
MP122B 'Operational Metrics – Part 2'	✓	Targeted
MP125 'Correcting Device Information for the ESME Variant'	✓	Approved

June 2023 SEC Release – 29 June 2023		
Modification	DCC System impacts?	Status
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
MP122B 'Operational Metrics – Part 2'	✓	Targeted

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
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 9 August 2022. Members heard an update on the development of the digitalised Whole System Technical Code (dWSTC), which has been approved for three workstreams: the Digitalisation workstream, the Alignment, Simplification and Rationalisation (ASR) workstream, and the Training & Guidance workstream. The project is now moving into its delivery period, scheduled to last until 2026. This currently impacts subscribers to the Distribution Code and the Grid Code.

Members re-assessed the Forum's approach to principle-based guidance for modifications and change proposals, and with the support of Ofgem agreed to investigate the possibility of introducing a standard change proposal form which would be used by all Code Administrators.

The CACoP Forum reviewed its Forward Work Plan and discussed ownership of ongoing tasks, including maintaining the Horizon Scanner document. The previous owner has recently left the Forum – the replacement representative for their Code agreed to investigate what actions are outstanding.

All Codes agreed to update their relevant sections of the document before the next meeting, when a new owner will be assigned.

Members were notified that a lessons learned log has been created as part of the ongoing work to assess the impacts of aligning Code release dates. Codes are encouraged to submit any information about what went well and what could have been improved when implementing cross-Code changes, or single-Code changes if the lessons would be valuable for others.

Cross Code Steering Group (CCSG) update

The CCSG is due to meet 12 September 2022. At the time of writing 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.

We have reached out to the Balancing Settlement Code (BSC), to further understand the cross-Code impact from [DP206 'Allowing Generation Licence Holders to Apply Export MPANs'](#). We have previously discussed the impacts from DP206 with BSC colleagues in July 2022, and at the time it was noted the change could have far reaching impacts. We have proposed a follow-up session with Elexon to understand the lead times of the BSC-related changes and what further considerations have been given to potential Grid Code changes. It is noted that there may also be a need, once requirements for the change are better understood, to review with Ofgem any potential Licence implications.