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Paper Reference:	SECP_113_2802_15
Action:	For Discussion
Acronyms and Defined Terms SEC Glossary	

SEC Change Update Report – February 2023

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** any views and feedback on the modifications raised in section 2.

Rachel Black

SECAS Team

21 February 2023

Attachments:

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

1. Overview

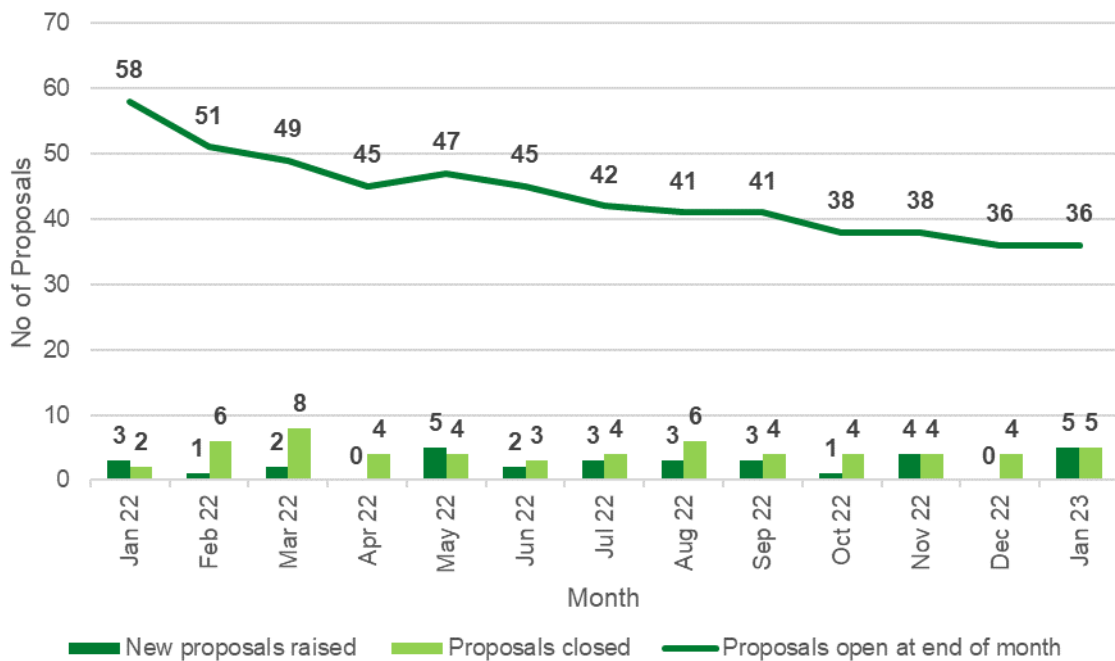
This information is correct as at the end of January 2023.

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)	36	379 WD
Proposals concluded in the last 12 months	52	378 WD
DCC System impacting modifications decided upon	9	596 WD
Non-DCC System impacting modifications decided upon	22	219 WD
Proposals withdrawn	21	452 WD

2. Modification updates

MP208

[MP208 'Northbound Prioritisation of N56 Alerts'](#) is seeking to resolve an issue where payments are being held 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.

The DCC is developing a Northbound prioritisation system as part of its Network Enhancement programme but suggests that MP208 and other prioritisation modifications should continue. We are working to ensure that the different prioritisation workstreams are aligned to a coherent strategy and that SECAS, the Operations Group (OPSG) and the Panel have oversight of this. For the moment both MP208 and [SECMP0028 'Prioritising System Messages'](#) are proceeding as normal, however we are working with the modification Working Groups and the DCC to ensure that efficiencies in costs and resource are realised across any shared solution architecture.

The DCC has completed a Preliminary Assessment on MP208, which gives a timeline of six months from the point of approval to the end of Pre-Integration Testing (PIT). Due to the urgency of the issue, the DCC has an action to confirm to the Technical Architecture and Business Architecture Sub-Committee (TABASC) whether it is possible to introduce the technical changes sooner, with the modification remaining open to deliver the governance. We believe that the modification process should not be a limiting factor in delivering the Northbound prioritisation solution as there is nothing in the SEC to prevent the DCC from implementing this.

DP218

SEC Section K 'Charging Methodology' sets out how the DCC charges SEC Parties, including how the types of Fixed Charges are apportioned between DCC Users and how communications services (the sending of Service Requests) are charged. The Smart Energy Code Company (SECCo) Board previously investigated how much work is generated by Other Users and agreed that further investigation into the current charging arrangements would be beneficial. To support this, the DCC raised [DP218 'Review of the SEC Charging Methodology'](#) with the agreement of the Panel to holistically review the DCC Charging methodology and determine whether any change should be taken forward.

Two distinct issues have been identified under this Draft Proposal:

- Who uses the DCC Systems and how they are charged; and
- How the DCC Fixed Charges, which includes SEC administration costs, are apportioned between different Party types.

We issued a request for information (RFI) which closed at the end of January 2023. We will be discussing the responses and the next steps for this modification in more detail under a separate

item. A Working Group meeting will be held in mid-March to review the responses and agree the next steps, after which we expect the Draft Proposal to be formally split into separate parts.

MP085B

[MP085B 'Synchronisation of smart meter voltage measurement periods \(meters currently installed\)'](#) seeks to ensure all Electricity Smart Metering Equipment (ESME) currently installed commences Root Mean Square (RMS) voltage readings at consistent time periods. [MP085A 'Synchronisation of smart meter voltage measurement periods'](#) has already been implemented to provide a consistent approach for all new Devices, while MP085B is seeking a solution for Devices already installed.

Manufacturers have confirmed either that their Devices perform as expected or that they are due to provide firmware update to rectify the issue. We have advised the Proposer to withdraw the modification as no SEC changes are required to deliver a solution to the identified issue, but the Proposer is reluctant to do so.

MP165

Electricity Network Parties have a statutory obligation to ensure that the voltage supplied to consumers' premises from low voltage electricity networks is always between defined limits. They currently do this by making planning assumptions when low voltage networks are designed. During the development of the Smart Metering Equipment Technical Specifications (SMETS), Electricity Network Parties requested that the average Root Mean Square (RMS) voltage readings from ESMEs would be recorded with a mandated level of accuracy. Such a requirement is not currently codified in the SMETS or the Great Britain Companion Specification (GBCS).

The uncertainty associated with the lack of a mandated level of ESME accuracy means that Electricity Network Parties must take conservative planning assumptions when designing and analysing performance of low voltage networks of, thereby preventing them from realising the full benefits from the smart meter rollout. [MP165 'ESME Voltage Accuracy'](#) is seeking to resolve this issue.

We have been carrying out an information gathering exercise to understand the level of ESME voltage accuracy. All respondents have stated that Devices have a minimum accuracy level of $\pm 1\%$. Mandating this would fall under the Measuring Instruments Directive (MID) or the Measuring Instruments Regulations (MIR) and does not require a change to the SEC. We have advised the Proposer to withdraw the modification for this reason, but the Proposer is reluctant to do so.

3. Change Sub-Committee decisions

Recent decisions

The CSC last met on 21 February 2023.

The CSC approved the following Modification Reports for progression to the Report Phase:

- [MP215 'Communications Hub Ordering and Forecasting'](#)
- [DP227 'Pre-SMETS2 v4.2 Device IVP Extension'](#)

The CSC converted the following Draft Proposal to a Modification Proposal for progression to the Refinement Process:

- [DP231 'Firmware upgrade pathways'](#)

The CSC considered the following new Draft Proposals and agreed to leave them in the Development Stage for further work to understand the issue:

- [DP228 'Other User Demand Forecasting'](#)
- [DP229 'Notification of material change to User Systems to include decommissioning'](#)
- [DP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#)
- [DP232 'ACB Certs on I&C'](#)
- [DP233 'Review of Appendix AG Incident categorisation'](#)
- [DP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'](#)
- [DP235 'Enhanced Meter Data Access for Other Users'](#)

The CSC also agreed for the February 2023 SEC Release to go live.

Upcoming decisions

The next CSC meeting will be on 21 March 2023.

We are not currently expecting to ask the CSC to approve any Modification Reports for progression to final decision.

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

- [DP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#)
- [DP232 'ACB Certs on I&C'](#)
- [DP233 'Review of Appendix AG Incident categorisation'](#)
- [DP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'](#)
- [DP235 'Enhanced Meter Data Access for Other Users'](#)

Further Draft Proposals may be raised nearer the meeting that could be progressed directly to the Refinement Process or the Report Phase.

4. New Draft Proposals

DP227

[DP227 'Pre-SMETS2 v4.2 Device IVP Extension'](#) was raised by Ecotricity on 24 January 2023.

The current Installation Validity Period (IVP) end-date displayed in the Technical Specification Applicability Tables (TSAT) for all SMETS2 Devices prior to version 4.2 is 27 April 2023. If the IVP end-date for pre-SMETS2 v4.2 Devices is not extended, any of these Devices not yet installed will need to be scrapped at financial and environmental cost, as Supplier Parties, Device Manufacturers and Meter Asset Providers (MAPs) would not be able to install their existing stock.

DP228

[DP228 'Other User Demand Forecasting'](#) was raised by the DCC on 31 January 2023.

In recent months, there has been an unforeseen large increase in System demand from Other Users, with some Other Users increasing their demand significantly as the popularity of consumer-based energy apps increases. The DCC also considers Other User demand more difficult to predict, especially where their customer numbers increase significantly over a short period of time.

The volume of traffic has resulted in incidents, which affect all DCC Users and consumers.

DP229

[DP229 'Notification of material change to User Systems to include decommissioning'](#) was raised by the Security Sub-Committee (SSC) Chair on 8 February 2023.

The SEC requires Users to notify the SSC of any new components or functionality to be included in their User System. However, the SEC does not explicitly state that Users must notify the SSC prior to discontinuing a component or functionality from their User System or decommissioning the whole User System. The implicit requirement is being included in the Security Controls Framework (SCF) and that document is being updated to make the requirement explicit.

DP230

[DP230 'Review the SLA for delivery and completion for SMETS1 firmware'](#) was raised by the DCC on 9 February 2023.

The DCC Systems have a limit to the amount of firmware images that can be processed meaning that if a significant volume of large firmware images needs to be processed, they must be spread over several days. Some ESME have a very large firmware image, more than 750kB, that requires being broken down into multiple images. The current processing of these images is possible at maximum capacity of 12,000 images a day.

DP231

[DP231 'Firmware upgrade pathways'](#) was raised by the SSC Chair on 13 February 2023.

Certain Device models need to have a firmware upgrade applied in a specific order. Failure to follow the specific order can result in unintended consequences. Investigation of the issue indicates that it is not an uncommon requirement for firmware updates to be implemented in a specific order.

The information required to ensure each Device has its firmware upgrade applied in the correct order is not included within the Firmware Information Repository (FIR), nor is there a requirement in the SEC for that information to be provided.

DP232

[DP232 'ACB Certs on I&C'](#) was raised by the DCC on 14 February 2023.

The DCC has noted there are several Communication Hubs that fail the first Service Reference which adds a meter; this leads to Install and Commission (I&C) process failure on-site. The cause of this issue is due to the Data Service Provider (DSP) using the incorrect Access Control Broker (ACB) certificate to provide the Message Authentication Code (MAC) for the first Service Request because the DSP does not know which ACB certificate is in the Device. The timeout of the ACB Certificate Request (SR 6.24.1) is 180 seconds with three short retries of 40 seconds. As a result, the certificate confirmation process will take more than three minutes to complete if the ACB certificate on the Device is not the first attempted certificate. The issue is that the ACB certificate on the Devices is not known before I&C. This results in a higher I&C failure rate on site, or where a retry is required an extended I&C process.

At the time of receiving the problem statement an estimated 100 refurbished Communications Hubs have been impacted by this problem. However, as an increased security measure there has been a proposal to introduce new ACB certificates more often, potentially on an annual basis. Each new ACB Certificate would increase the potential retry time by three minutes for each certificate retry. This emphasises the importance of obtaining the correct ACB certificate first.

New Device certificates are required for 2023 but the rollout of the new Devices and certificates may take some time.

DP233

[DP233 'Review of Appendix AG Incident categorisation'](#) was raised by the DCC on 14 February 2023.

SEC Appendix AG 'Incident Management Policy' relates to the DCC's approach to Incident Management. While the whole document needs a review, the initial area of concern for DCC Service Users is the Categorisation Matrix, covered in clause 2.4.4. As it is currently written, the descriptions are not clearly defined, which has caused confusion and differing interpretations. Additionally, the Categorisation Matrix, has lost a considerable level of relevance, due in large part to the evolution of the DCC landscape and the requirements of the DCC's Service Users.

As a result, the DCC's current approach to Incident Prioritisation (also known as Classification) cannot align clearly with Service Users' expectations, as the current Incident Management descriptions and Prioritisation Matrix within SEC Appendix AG are out of date and ambiguous. This leads to misaligned understanding of incident impact, failed Service User expectation, and reduced levels of customer service experienced by the Service Users.

DP234

[DP234 'Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC'](#) was raised by n3rgy on 14 February 2023.

There is no facility within the SEC to support the General Data Protection Regulation (GDPR) principles of 'Public Task' or 'Legitimate Interest'. This means that public authorities, such as Registered Social Landlords and Local Authorities, find it difficult to obtain consumption data from those consumers which they have a duty to protect.

DP235

[DP235 'Enhanced Meter Data Access for Other Users'](#) was raised by n3rgy on 14 February 2023.

SEC Appendix AD 'DCC User Interface Specification' (DUIS) details which Service Requests each User Role can retrieve. Other Users are limited in the Service Requests they can access. As Third Parties are developing products to assist consumers manage their usage, the limitations on the Service Requests they can access is preventing them from offering improved services.

DP236

[DP236 'Commissioned Communication Hub SMI Status Remains as Pending'](#) was raised by the DCC on 20 February 2023.

When a Communications Hub is connected to the Smart Meter Wide Area Network (SM WAN), a notification known as 'Birth Event' is automatically sent to the DSP. The DSP will then update the Communications Hub Function (CHF) status from 'Pending' to 'Commissioned' and the Gas Proxy Function (GPF) from 'Pending' to 'Installed Not Commissioned' in the Smart Meter Inventory (SMI). If the 'Birth Event' notification is not received by the DSP, the CHF and GPF statuses are not updated in the SMI.

This means that the SMI status can be inconsistent and incorrect, which can lead to problems with subsequent processing with either Service User or DCC business processes. This failure to update the SMI status does not cause any immediate or direct impact to communication with the CHF or GPF. However there is a SEC compliance issue which requires the removal of any 'Pending' Devices that have held that status for more than 36 months. This requirement does not take into account other information which may indicate that the Communications Hub is active (installed and commissioned). The DCC has advised that there are approximately 100,000 cases for Communication Service Provider (CSP) South and Central, and 54,000 for CSP North where the CHF or GPF status has been pending for 36 months or more.

5. DCC Assessments

DCC Impact Assessment requests

The Change Board considered the following Impact Assessment request on 25 January 2023:

- [MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs'](#) – the Change Board approved this request

DCC Assessment timescales

This information is correct as at the end of January 2023.

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

DCC Assessment timescales		
Assessment	Total	Average duration
Preliminary Assessments open	1	2 WD
Preliminary Assessments completed in the last 12 months	14	35 WD
Impact Assessments open	3	41 WD
Impact Assessments completed in the last 12 months	8	48 WD

DCC Preliminary Assessments

The DCC's Collaborative Design Review recommended 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 in progress			
Modification	Accepted	Target duration	Current duration
MP217	30 Jan 23	15 WD	2 WD

DCC Preliminary Assessments completed in the last 12 months			
Modification	Returned	Target duration	Actual duration
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	12 WD
MP176	15 Jul 22	15 WD	25 WD
SECMP0028	23 Aug 22	15 WD	20 WD
MP211	21 Sep 22	15 WD	12 WD
MP178	21 Oct 22	15 WD	15 WD
MP202	21 Oct 22	15 WD	17 WD

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DCC Preliminary Assessments completed in the last 12 months			
Modification	Returned	Target duration	Actual duration
MP216	31 Oct 22	15 WD	26 WD
MP207	30 Nov 22	15 WD	17 WD
MP208	19 Jan 23	15 WD	24 WD
MP168	25 Jan 23	15 WD	181 WD
MP169	25 Jan 23	15 WD	38 WD

DCC Impact Assessments

DCC Impact Assessments in progress			
Modification	Accepted	Target duration	Current duration
MP176	30 Sep 22	40 WD	88 WD
MP178	9 Jan 23	40 WD	17 WD
MP211	9 Jan 23	40 WD	17 WD

DCC Impact Assessments completed in the last 12 months			
Modification	Returned	Target duration	Actual duration
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
MP102B	21 May 22	40 WD	41 WD
MP170	25 May 22	40 WD	78 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 25 January 2023:

- [MP167A 'Review of SEC documents \(Testing Approach Document criteria\)'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a)¹ and (e)².
- [MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'](#) – the Change Board deferred its vote on this Modification Proposal until an ad-hoc meeting could be held with the SSC Chair present.
- [MP183 'Post Commissioning Obligations Reporting'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a) and (b)³.
- [MP220 'MMC Changes resulting from GBCS v4.1 Device Testing'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a).
- [MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objective (a).

The Change Board voted on the following modification in an ad-hoc meeting on 1 February 2023:

- [MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'](#) – approved under Self-Governance on the basis it would better facilitate SEC Objectives (a) and (e).

Authority decisions

The Authority has not issued a decision on any modification since the last Panel meeting.

There are no modifications currently with the Authority for decision.

Withdrawn proposals

No modifications have been withdrawn since the last Panel meeting.

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

² Facilitate 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.

³ 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.

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7. Releases and Designations

SEC versions issued

The following SEC versions have been released since the last update:

SEC versions issued		
Version	Date	Key changes
67.0	27 Jan 23	Updates to implement MP221 'CHTS v1.0 and GBCS v1.1 Installation End Date and Maintenance End Date' and an updated version of the Migration Testing Approach Document (MTAD) to partially decommission the Device and User System Testing (DUST) Service for the Middle Operating Capability (MOC) (Secure) cohort

Upcoming SEC Release scopes

February 2023 SEC Release – 23 February 2023		
Modification	DCC System impacts?	Status
MP167A 'Review of SEC documents (Testing Approach Document criteria)'		Approved
MP172 'Reduced CPA & CPL requirements for innovation and Device field trials'		Approved
MP210 'RSA forecasts, orders and pay stock charges for Alt HAN Equipment'		Approved

- [MP183 'Post Commissioning Obligations Reporting'](#) has been removed from scope and has been moved to the June 2023 SEC Release.

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
MP125 'Correcting Device Information for the ESME Variant'	✓	Approved
MP128A 'Gas Network Operators SMKI Requirements'		Approved
MP183 'Post Commissioning Obligations Reporting'		Approved
MP215 'Communications Hub Ordering and Forecasting'		Targeted
MP220 'MMC Changes resulting from GBCS v4.1 Device Testing'		Approved

November 2023 SEC Release – 2 November 2023		
Modification	DCC System impacts?	Status
MP122B 'Operational Metrics – Part 2'	✓	Approved
MP137 'Sharing information on Defects and Issues'		Targeted
MP216 'Incorporation of Category 2 Issue Resolution Proposals into the SEC – Batch 9'		Targeted
DP226 'Incorporation of Category 3 Issue Resolution Proposals into the SEC - Batch 10'		Targeted

- [DP226 'Incorporation of Category 3 Issue Resolution Proposals into the SEC - Batch 10'](#) has now been added to the scope of this release.

February 2024 SEC Release – 29 February 2024		
Modification	DCC System impacts?	Status
No modifications currently targeted		

June 2024 SEC Release – 27 June 2024		
Modification	DCC System impacts?	Status
MP162 'SEC changes required to deliver MHHS'	✓	Approved
MP178 'Removing DSP validation against the SMI join status for SR8.8.x'	✓	Targeted
MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs'	✓	Targeted
MP211 'Aligning the SMI with the CPL'	✓	Targeted

- [MP178 'Removing DSP validation against the SMI join status for SR8.8.x'](#) and [MP202 'Enduring Solution for SMETS1 and SMETS2+ PPMIDs'](#) have now been targeted for this release.

Ad-hoc SEC Releases			
Modification	Date	DCC System impacts?	Status
MP198 'Further Changes from the Review of the SMKI and DCCKI Document Set'	10WD after approval		Targeted

8. Cross-Code working

Code Administration Code of Practice (CACoP) Forum update

The CACoP Forum last met on 14 February 2023. At this meeting, the Forum received an update from Ofgem on Code Reform, and discussed how it can feed into this work. Ofgem will engage further with the Forum ahead of upcoming RFIs. The Forum also agreed its approach for 2023, moving to a dynamic work plan approach; corresponding changes were also approved to the Forum's terms of reference. The Forum also discussed the Retail Energy Code Company's (RECCo) digitalisation principles and considered how it can help facilitate discussions on this across the Codes. The next Forum meeting will be on 11 April 2023.

The Forum Chair rotates annually, and in 2023 the SEC is chairing the Forum. This year, we intend to focus the Forum more on sharing knowledge, ways of working and lessons learnt across the Code bodies, to help improve consistency between processes and procedures. We'll also be actively engaging with Ofgem over the upcoming Code Reform and Consolidation work, and identifying initiatives we can deliver in advance of this that would support the principles and aspirations of this work. The Forum will also be engaging with the Cross-Code Steering Group (CCSG) to identify ways to streamline the oversight of active cross-Code changes and remove any duplication across the two groups. The Forum's new dynamic work plan will be published on the [CACoP website](#) shortly.

Cross Code Steering Group (CCSG) update

The CCSG last met on 13 February 2023.

The Retail Energy Code (REC) representative signposted a potential change that may impact the SEC and the REC. This is likely to be raised by Citizens Advice, concerning smart meters changing operating mode from Credit to Prepayment. The change will likely request a flag be provided, for monitoring purposes, to record that the reason the Responsible Supplier has instigated a change of smart meter operating mode from Credit to Prepayment is either at the Consumer's request or required by the Supplier for credit management purposes.

No other changes were considered to be potentially impacting the SEC.