

October 2025 SEC Sub-Committee Report

The monthly Sub-Committee report provides the SEC Panel and Parties with an update on recent activities from the Panel's Sub-Committees, including key topics discussed, risks and issues, and change items.

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Section 1 of this report '[Key Sub-Committee topics](#)' provides an overview of the Sub-Committees' activities on the key topics which have been discussed across several Sub-Committees during the last month. This month's key topics are:

1. [Data Services Provider \(DSP\)](#)
2. [Outage Management](#)
3. [The Communications Hubs and Networks \(CH&N\) programme](#)
4. [Future Service Management \(FSM\)](#)
5. [SMETS1](#)

Section 2 '[SEC Change](#)' provides an update on the progress of SEC Modifications and the recent and upcoming decisions of the Change Board (CB) and Change Sub-Committee (CSC) under delegated authority from the Panel.

Section 3 '[Sub-Committee Activities](#)' provides details of any discussion held by the Sub-Committees that have met during the last month which are not included in the Section 1 Key Sub-Committee topics.

The Sub-Committees that have met during the last month are:

- [The Communications Transition Group \(CTG\)](#)
- [The Technical Architecture and Business Architecture Sub-Committee \(TABASC\)](#)
- [The Testing Advisory Group \(TAG\)](#)
- [The Operations Group \(OPSG\)](#)
- [The Security Sub-Committee \(SSC\)](#)
- [The Smart Metering Key Infrastructure Policy Management Authority \(SMKI PMA\)](#)
- [The Performance Assurance Board \(PAB\)](#)
- [Privacy Sub-Committee \(PSC\)](#)
- [Customer Challenge Group \(CCG\)](#)

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SECCo Head of Sub-Committee Management

19 October 2025

1. Key Sub-Committee topics

Topic	Sub-Committee activities
Data Services Provider (DSP) <i>The DCC's Data Services Provider (DSP) system is a central facility that controls the flow of messages to and from smart metering equipment.</i> <i>The contract for the current DSP solution is set to expire in 2028, and the DSP Programme will implement a range of replacement and new capabilities, along with the migration of Devices from the current DSP to the new DSP solution.</i>	TABASC: The DCC presented a Data Service Provider (DSP) Update on the DCC Connect low-level designs and requested feedback on the DSP Project Initiation Document (PID) V2.1: ➤ The TABASC noted the update and provided initial feedback. SSC: The DCC presented the SSC with an update on the proposed onshore/offshore model for the DSP 2.0 Lot 1: ➤ The SSC agreed the proposal. The DCC also presented the DSP 2.0 Lot 1 Interim Security Risk Assessment: ➤ SSC Members provided comments on the risks and mitigations identified by the assessment, which the DCC noted. TAG: The DCC provided the TAG with an update on the Trust Centre Swap Out (TCSO) DSP change approach to testing: ➤ The DCC highlighted that this change is planned to be progressed in parallel with the November 2025 Maintenance Release in the A-Stream set of test environments and governed under the DCC's internal Test Assurance team. ➤ The TAG noted the update. The DCC provided an update on DSP Fix Service Request Variant (SRV) 6.23 User Testing and approved the Testing Issue (TI) position and work-off plans for the DSP SRV 6.23 fix. The DCC also presented the testing Plan on a Page (POAP) aligned with the Future DSP DCC Licence Condition 13B (LC13B) plan required by regulation and governed by DESNZ: ➤ The DCC provided information on the Smart Routing Gateway, which will be introduced as part of the DSP 2.0, which the TAG noted.

Service outage management

Under the SEC service outages are categorised as either Planned Maintenance, Unplanned Maintenance, or BCDR testing.

The DCC publishes an [annual outage plan](#) to provide Users with advance notice.

TABASC: The DCC presented the Major Incidents (Mis) Quarterly Update to the TABASC:

- The TABASC raised concerns around the increase in Smart Metering Equipment Technical Specification version 1 (SMETS1) Final Operation Capability FOC Incidents, requesting a weekly update until the issue is resolved.
- The DCC presented an update on the TABASC review of the runbook for the Enduring Change of Supplier (ECoS) Business Continuity and Disaster Recovery (BCDR) test, which was requested by the OPSG.
- The TABASC noted the update and agreed to provide feedback to the OPSG as requested.

The DCC also presented an update on Draft Proposal (DP) 294 and the request for six additional Planned Maintenance windows during the summer months:

- The TABASC did not support the proposal and recommended that the DCC follows the existing SEC process to request additional Planned Maintenance to ensure appropriate oversight and governance of individual requests for additional service outage time.

OPSG: SECCo presented the MI Reports, noting two Incidents; INC000001288933 'SMETS1 Initial Operating Capability (IOC) Service Requests (SRs)' which occurred on 10 July 2025, along with INC000001294541 'SMETS1 FOC Cohort' which occurred on 2 August 2025. The OPSG approved the report.

The DCC also provided the MIs Quarterly Performance Summary for Q3 2025, noting five MIs in September 2025, of which four were Category 2 and one was Category 1 (relating to the SMETS1 Middle Operating Cohort MOC).

- The DCC confirmed the Category 1 and two Category 2 MIs had negatively impacted prepayment consumers.
- The OPSG Chair noted that around 50% of all MIs in 2025 originated within the SMETS1 FOC cohort, reinforcing ongoing FOC performance concerns.
- The OPSG agreed to review if a new risk or issue entry on the OPSG RAID log is required to capture ongoing risks with the FOC SMETS1 Service Provider (S1SP).

SECCo presented the Performance Measurement Report (PMR) for July 2025, noting that several performance measures had failed during the reporting period which were attributed to several FOC Incidents that occurred during July 2025.

SECCo also advised that it is developing a methodology approach with OPSG members to estimate the industry-wide costs associated with MIs, such as those affecting key industry processes like Pre-Payment vends and the Install and Commission (I&C) process:

	➤ The OPSG cautioned that while calculating these costs could help justify technical remedies or business cases for change, it could also inadvertently create pressure on energy suppliers to fund solutions. ➤ The OPSG agreed that the methodology could be valuable for building business cases, supporting change proposals, and helping the OPSG understand the true impact of Incidents. ➤ SECCo stated it would document the methodology taking the feedback received from the OPSG into consideration and bring it back to the OPSG for further review.
Communications Hubs and Networks (CH&N) <i>The DCC CH&N programme is aimed at delivering future-proof Communications Hubs (CHs) & Networks with an efficient supply chain by introducing new CHs which use the 4G network.</i>	CTG: The DCC shared an update on the 4G Communications Hubs and Networks (CH&N) programme with the CTG, noting that the finance portal is expected to be open by the end of September 2025: ➤ The DCC informed the CTG that manual Incident reporting continues to assess network performance and supports coverage improvements, and that the DCC expects to deliver a report on this to the OPSG by the end of November 2025. ➤ The DCC provided an update on the status of the Communications Hub (CH) supply chain and noted that the status of the VMO2 All Variants – Customer Stock Burndown is now rated ‘Amber’. ➤ The DCC agreed to return to the CTG in October 2025 with a root cause analysis for the issue relating to SIM pairing failures. OPSG: The DCC confirmed to the OPSG that the Modification Proposal (MP) 242 'Change to Operational Metrics to Measure on Success' reporting would continue to be provided as part of its regular reporting and was designed to provide a more detailed and accurate view of operational performance, especially during the mass rollout of 4G CHs: ➤ The OPSG requested that the DCC add the 4G data to the current SMETS2 Regional View Report and to combine the view of Communications Service Provider (CSP) in the Central and South (C&S) Regions into a single view, which the DCC agreed to do. TABASC: SECAS provided updates on the 4G Home Area Network (HAN) Diagnostics high-level requirements to the TABASC, and the DCC presented an update on the 4G HAN monitoring and Diagnostic Feasibility: ➤ An example HAN health report has been produced based on previous discussions, and the TABASC requested further examples of both high-level and detailed reports. ➤ The TABASC discussed the need for a Modification Proposal to amend SEC Appendix AH (Self-Service Interface Access Control Specification), and the DCC noted a preference for any Modification Proposal to be raised by Industry. ➤ The TABASC agreed the High-Level Requirements.

Future Service Management (FSM)

The support contract for the current Service Management solution, used to request DCC services, raise Incidents, and access reporting and diagnostics information, is due to expire in October 2025 and The Future Service Management (FSM) Programme will procure and implement a replacement solution.

TABASC: The DCC presented the TABASC with an update on Future Service Manager (FSM) migration and cutover, and explained the technical principles followed during this process:

- The DCC proposed to return to TABASC with a more detailed view of the FSM Migration Approach.

OPSG: The DCC provided an update to the OPSG following questions raised during the OPSG 148 Meeting:

- The OPSG requested additional assurance that FSM would not negatively impact other BCDR activities.
- The OPSG also raised concerns that the criteria lacked evidence of User experience and impact, especially since FSM was a mandatory replacement service. The DCC agreed to feed this back to its relevant internal teams and provide clarification.
- The OPSG approved the proposed approach to evidence the FSM Live Service Criteria (LSC), subject to the clarifications requested.

TAG: The DCC presented an update to the TAG on the approach to submit a LSC document for FSM Go-Live:

- The proposed approach includes the evidence and rational statementing relating to each criterion to support a go live determination.
- The TAG approved the DCC's approach to evidencing the FSM LSC.

SMETS1

First-generation smart meters, also known as SMETS1 (Smart Metering Equipment Technical Specifications v 1).

SMETS1 meters did not originally allow consumers to change energy supplier without losing smart functionality, such as the ability to provide remote meter readings to their energy supplier.

Many SMETS1 meters have now been incorporated into the DCC ecosystem to increase the functionality they provide when a consumer changes their energy supplier.

TABASC: SECAS presented the TABASC with an update on [MP304 'Scheduling Services for SMETS1 Devices'](#) and explained the proposed solution:

- The TABASC provided feedback on the proposal and noted the need for further information before providing a comprehensive view.

OPSG: The DCC advised the OPSG that SMETS1 Migration activity remains on track with most migrations to be completed by the end of 2025, marking the formal closure of active migration activity. The DCC also noted that SMETS1 Dual Control Organisation (DCO) programme involves re-hosting the DCO application to a hybrid cloud solution, while retaining the existing Hardware Security Modules (HSMs) 'on-premises':

- The DCC highlighted that the application itself remained unchanged, but that the infrastructure is being modernised to improve scalability and performance.
- The DCC advised that there should be no operational impact to the current Planned Maintenance outages scheduled during October 2025.
- The OPSG raised concerns regarding scalability, along with questioning whether the move to cloud infrastructure would address existing limitations.
- The DCC confirmed that cloud infrastructure performance is expected to be more efficient and scalable.
- The OPSG endorsed the proposed readiness criteria and go-live approach.

SSC: The SSC received an update from the DCC on the DCO re-procurement:

- The SSC agreed that there were no security related objections to go-live, pending remediations resulting from the penetration test being completed by 30 September 2025.

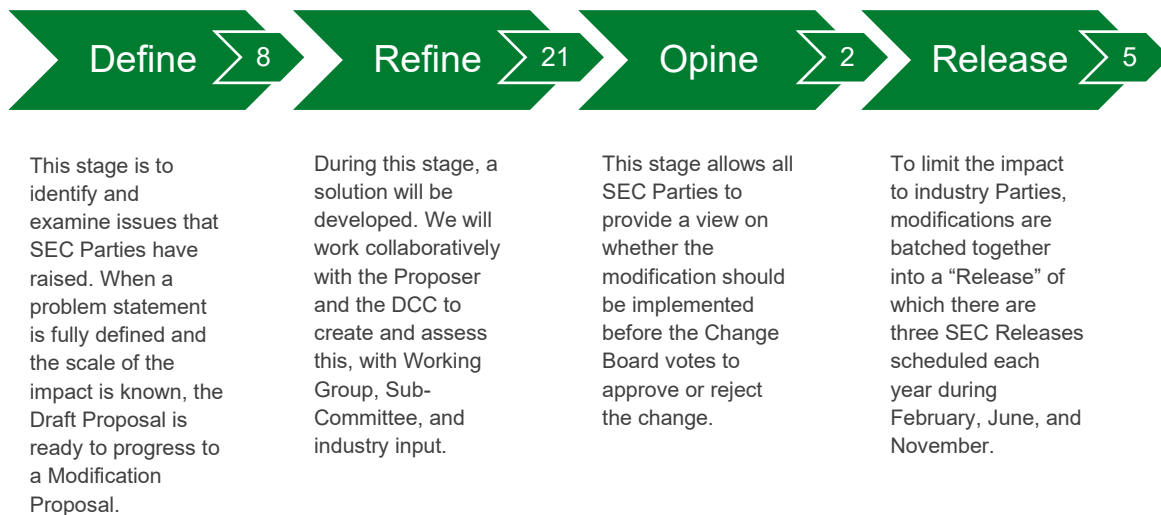
TAG: The DCC provided an update to the TAG on DCO Re-Procurement UIT:

- The TAG approved the Testing Issue (TI) positions and work off plans for DCO Re-Procurement.

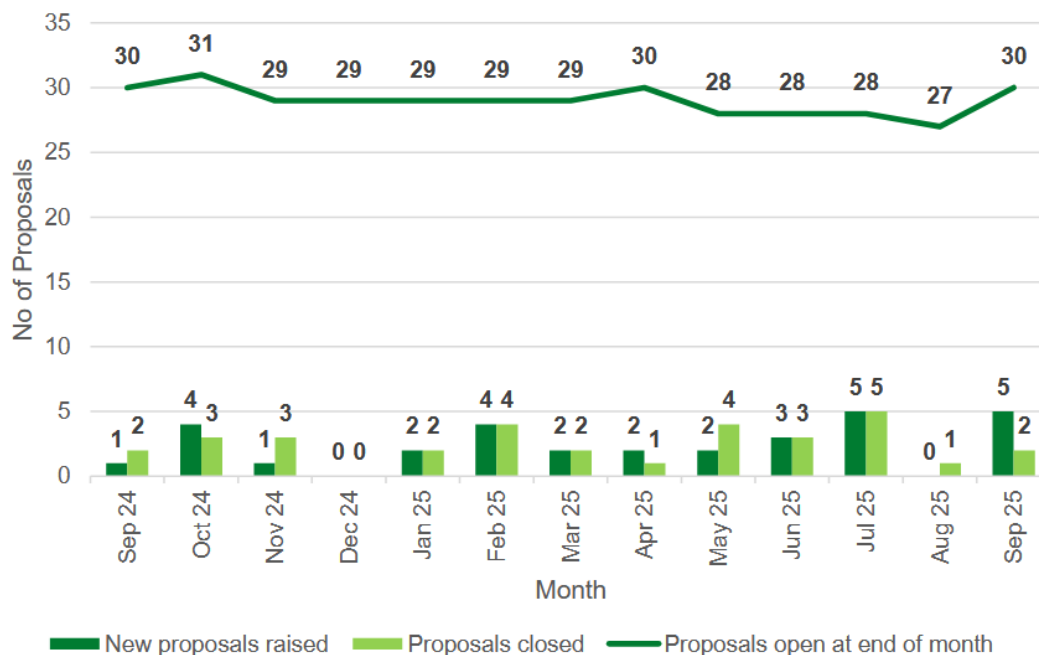
2. SEC Change

2.1 Overview

Number of proposals in each stage of the modification framework:



Volume of proposals going through the modification framework:



2.2 Modification updates and points to note

Modification	Priority	Update
MP169 'Managing the Consumer's refusal of a Smart Meter'	HIGH	A Request for Information (RfI) has been issued to establish how this issue is currently being dealt with by Parties.
DP218 'Review of the SEC Charging Methodology'	HIGH	On 4 August 2025 the DCC decided to withdraw this Draft Proposal. On 4 August, British Gas adopted the Draft Proposal under SEC Section D5.4. SECAS is working with the new Proposer on the next steps.
MP255 'WAN issues during Smart Meter installations'	HIGH	SECAS is working with the DCC to establish the changes that need to be made to address this issue. The DCC is speaking to its Service Providers to understand whether the issue is caused by an underlying contractual issue.
MP300 'Additional Operational Metrics to Measure on Success'	HIGH	On 16 September 2025 the Change Sub-Committee (CSC) converted this Draft Proposal into a Modification Proposal and initiated the Refinement Process. SECAS will now develop the Business Requirements with the Proposer.
MP302 'Supplier Alerts for ENOs'	HIGH	On 16 September 2025, the CSC agreed for this modification to enter the Refinement Process. SECAS will work with the DCC and the Proposer to develop Business Requirements before presenting the Modification Proposal to the TABASC and the OPSG.
MP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)'	VERY HIGH	The DCC is seeking a decision on this Modification Proposal by 31 December, so it will follow an expedited timetable. The Preliminary Impact Assessment was received from the DCC on 29 September 2025. The Refinement Consultation for this modification closed on 14 October 2025, with three supportive responses. It will be presented at the October Change Board (CB) for a request for the Impact Assessment.

DP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)'

MP304 is seeking to make SRV4.3 schedulable in SMETS1 Smart Metering Systems to avoid an estimated £35m of Short Message Service (SMS) costs. To achieve this cost avoidance, the decision will have to be completed by 31 December 2025. It will also require an 80% uptake by Suppliers

moving to the new DCC User Interface Specification (DUIS) version that will be created. The DCC is talking to Users to understand what the uptake profile is likely to be to inform a further assessment of the scale of any benefits.

MP298 'Enhancements to SEC Appendix AW – Performance Assurance'

On 24 September the CB unanimously voted to approve this Modification Proposal. On 8 October, Electricity Networks Northwest Limited (ENWL) referred this decision to the SEC Panel. This referral will be presented to the SEC Panel on 28 October 2025 for a decision to uphold or overturn the decision made by the CB.

2.3 Change Sub-Committee decisions – July 2025

Modifications to be progressed as a Fast-Track modification

- [MP299 'Update Citizens Advice Scotland to Consumer Scotland'](#)

Modifications moving to Refinement Process:

- [MP300 'Additional Operational Metrics to Measure on Success'](#)
- [MP301 'Review of Additional Registration Data \(Gas Transporters\)'](#)
- [MP302 'Supplier Alerts for ENOs'](#)
- MP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)'

Modifications remaining in Development Stage:

- [DP303 'Aligning DCC Certificate processes with SMKI standards'](#)

2.4 Change Board decisions – September 2025

Change Board – Approved

- [MP298 'Enhancements to SEC Appendix AW – Performance Assurance'](#)
- [MP283 'Data Breach Reporting'](#)

2.5 SEC versions issued:

SEC v121.0 was implemented on 7 October 2025, as part of an ad hoc SEC Release for [MP299 'Update Citizens Advice Scotland to Consumer Scotland'](#).

SEC v121.0 was designated by DESNZ Designation on 17 October 2025 for the Virtual Wide Area Network Key Infrastructure (VWKI) implementation into the SEC. This included the redesignation of Appendix AZ 'Virtual WAN Transition Document' and the addition of six new appendices into the SEC.

2.6 Cross-Code working

Code Administration Code of Practice (CACoP) Forum update

The latest CACoP meeting was held on 16 September 2025. Market Facilitator Update Elexon provided an update on its role as Market Facilitator, appointed by Ofgem to support the development of national and local flexibility markets. Key progress includes industry engagement through workshops, the refinement of governance proposals, and Balancing and Settlement Code (BSC) Modifications to secure funding and formalise Elexon's delivery role. The operational launch is targeted for December 2025, with full functionality expected by early 2026. Forum members stressed the importance of clear communication as the initiative moves from design to delivery.

Data Integration Platform (DIP) Change Process

Elexon outlined the DIP Change process, which governs how modifications to this central market infrastructure are proposed and implemented. The process includes initiation, consultation, decision-making, and implementation, and aims to balance flexibility with robust governance. Members appreciated the alignment with existing code processes and welcomed the clarity it brings to stakeholders navigating change routes.

CACoP Principle 17

The Forum discussed Principle 17, which requires Code Bodies to support Ofgem's strategic direction. Despite its longstanding presence, members noted inconsistencies in interpretation and application across Codes. Suggestions included clearer guidance from Ofgem and practical examples to help standardise expectations. The Chair agreed to circulate relevant documentation and revisit the topic in future meetings.

Publication of CACoP Survey Results

Attendees agreed that the annual CACoP survey results should be published centrally on the CACoP website to ensure consistency. While individual Codes may issue their own communications, a coordinated release within the same week was preferred. The Chair will notify members of the publication date in advance and Codes will signpost to the results accordingly.

The next CACoP meeting will be scheduled to take place in November or December 2025, depending on attendants' availability, with no date set yet.

Cross Code Steering Group (CCSG) update

The CCSG last met 6 October 2025. There were no new issues identified impacting from changes from other codes or vice versa.

3. Sub-Committee activities

3.1 Communications Transition Group (CTG)

The Purpose of the CTG is to facilitate the execution of the transition to next generation Smart Metering communications to maintain continuity of smart services to consumers. This includes enabling and fostering communication and cooperation between the DCC, which is responsible for service provision and CH delivery, and Users, who are responsible for deployment of new CHs, and other stakeholders.

The CTG is responsible for 4G transition activities and SMETS1 End of Life activities, which include the development and management of the overall transition plan, alongside management of issues and risks with input from CTG Members, the DCC, DESNZ and Ofgem.

The CTG has met once since the previous SEC Sub-Committee Report, on 15 September 2025, and discussed the following topics:

4G CH only exchange site visits

DESNZ provided an update on the e [4G CH only exchange site visit consultation](#) to determine the centralised price methodology for CHs only exchange visits. The proposed approach includes four cost components (installer, appointment setting, forward and reverse logistics) and a 10% adjustment rate for unsuccessful visits. Mandatory RfIs will be issued annually to Large Supplier Parties, and on a voluntary basis for small suppliers and Meter Operators, as part of an annual review. The consultation closes on 4 November 2025, with implementation planned for April 2026.

Future of the CTG

The CTG confirmed that meetings cadence will transition from monthly to quarterly starting in 2026, and Members noted that this decision has been approved by the Panel. SECAS will share the 2026 Meeting Schedule during CTG 32.

3.2 Technical Architecture and Business Architecture Sub-Committee (TABASC)

The TABASC provides advice and guidance to the Panel regarding the Technical Code Specifications, End-to-End Technical Architecture, and Business Architecture.

The TABASC has met once since the previous SEC Sub-Committee Report, on 2 October 2025, and discussed the following topics:

Alt HAN performance

Alt HAN presented an update on the risk of HAN performance failing to meet expected coverage, and its proposed next steps. An overview of the Crowded Meter Room progress was provided, noting that Alt HAN is currently investigating alternative processes to address the attrition rate challenges. The TABASC agreed that the risk discussed remains present.

MP301 'Review of additional registration data (Gas Transporters)'

SECAS presented an update on [MP301 'Review of additional registration data \(Gas Transporters\)'](#) and explained the proposed solution. The TABASC discussed the impacts of Gas Network Parties leaving the SEC and noted the update.

Virtual Wide Area Network (VWAN)

SECAS provided an update on the Virtual WAN (VWAN) Consultation ahead of the soft launch in January 2026. The TABASC provided feedback and noted the update.

3.3 Testing Advisory Group (TAG)

The TAG supports the Panel with obligations in relation to testing activities, including providing advice and making decisions on all aspects DCC SIT and User Testing Services (UTS).

The TAG has met once since the previous SEC Sub-Committee Report, on 24 September, and discussed the following topics:

CSP North Scaling & Optimisation Phase 2 Approach to Testing

The DCC presented an update for the CSP in the North Region (CSPN) Scaling & Optimisation Phase 2 approach to testing. The DCC informed the TAG that the change is planned to be progressed in parallel with the December 2025 Maintenance release in the A-Stream of testing environments and will be governed by the DCC's Test Assurance team using agreed practices. The TAG noted the update.

November 2025 SEC Release

The DCC presented the Test Completion Report (TCR) for the November 2025 SEC Release, along with an update on User Testing for November 2025 SEC Release. The TAG noted the updates.

VWAN

The DCC presented an update on the VWAN System Capacity Testing Approach Document (SCTAD). The TAG noted the update.

Operations Group (OPSG)

The OPSG focuses on cross-industry matters that affect, or have the potential to affect, multiple SEC Parties. The OPSG has met twice since the previous SEC Sub-Committee Report, on 22 September and 14 October, and discussed the following topics:

DCC Contract Issues

The DCC introduced its new "polluter pays" principle in its contracts with Service Providers, and highlighted the implications of this change. The OPSG raised concerns about legal complexity, the need for clear processes, and the importance of updating the SEC to make the arrangements workable in practice.

Performance Measurement Report – June 2025

SECCo presented the Performance Measurement Report (PMR) for June 2025, highlighting that Performance Measurement (PM) 2.1 and Code Performance Measure (CPM) 3A had not achieved target service level. The OPSG approved the report.

Fylingdales

The DCC presented the proposed CSPN solution of updating the “Additional Information” column in the coverage database to indicate that either variant (420 or 450) may be used in certain postcodes, noting the update would be at zero cost.

The OPSG raised operational concerns, including whether handheld terminals used by engineers would display the full “Additional Information” field and suggested that CSPN should provide clearer guidance on which variant to use, rather than leaving it to installers to decide. The OPSG also questioned whether SEC Appendix I (CH Installation and Maintenance Support) should be updated to reflect the new guidance.

The DCC acknowledged the concerns and advised it would review the Incident Management process, check whether SEC Appendix I needed updating and ensure that installs where either CH variant is used in the updated postcodes were not feedback to industry incorrectly. The DCC reiterated that the change was not a full solution, but a step forward that provided flexibility and reduced risk of non-compliance.

The OPSG did not raise any formal objections to the proposed solution.

Product Assurance

The DCC addressed two MIs: Public Land Mobile Network (PLMN) 11 and Packet Data Protocol (PDP), noting that no further occurrences of PLMN 11 had been observed on upgraded CHs and therefore the issue was now considered closed.

The DCC discussed PDP, stating that the number of affected devices had dropped to around 8,000, all of which now recovered within 24 hours. The DCC advised that despite the improvement, the root cause was never identified, and likely never will be, but considers the issue closed.

The OPSG expressed concern that the PDP issue was only a mitigation, and does not fully resolve the issue, and questioned whether it should be considered closed, especially given the potential impact on Pre-Payment Consumers.

The DCC acknowledged the concern and reiterated that the issue was now under control and emphasised that all affected CHs now recover within 24 hours.

TIRG Issues Log

SECAS presented Issue 8: Pre CH Exchange Checks and Issue 21: Trust Centre Swap Out (TCSO) ‘Happy Path Report’ and requested approval from the OPSG to close both Issues. The OPSG agreed to close both Issues.

CH Returns

The DCC noted that of the returned CHs reported during 2025 up to September, that over 50% were marked as 'no fault found', raising concerns about unnecessary returns.

The OPSG highlighted that many CHs are returned simply because the first unit had failed to commission during installation, and that engineers are instructed to try another CH, the first unit is then returned, often without a clear fault, leading to unnecessary charges.

The OPSG and SECCo raised concerns about vague definitions in the SEC regarding the determination of a damaged CH, noting that CSPs may classify superficial issues (e.g. scratches and stickers) as faults. The OPSG agreed that clearer guidance and tolerance levels were needed to ensure CHs were not unnecessarily rejected or charged.

The OPSG requested that the DCC clarify how CSPN determines a CH as damaged and therefore fails to meet the minimum requirement to go through the fault triage process by the CSP and to provide historical examples. The DCC confirmed it would do this.

ECoS

The OPSG raised concern that the User Experience slide for ECoS lacked reference to the Consumer and GSoP (Guaranteed Standards of Performance) and requested that future documentation included Consumer impact and GSOP considerations. The DCC noted the concern and requested that OPSG Members provide feedback on their experience and the identified User Business Needs of the current system to the DCC.

GSoP

The OPSG Chair confirmed that a full review of the SEC against GSoP proposals is underway, noting that the SEC Panel had agreed to the review, and a draft PID would be shared with the OPSG before sign-off. The OPSG Chair stated that GSoP would become a standing agenda item at OPSG meetings. The OPSG requested that GSoP also be a regular item at SEC Panel meetings and the OPSG Chair agreed.

Global Quarantine Messages & Price Cap Events

The OPSG raised concerns about the global quarantine of SR messages that are paused during the deployment of system changes by the DCC such as Price Change events, noting that the quarantining of SRs was triggered by the DCC's internal control mechanisms when message volumes spike after the paused SRs are resumed. The OPSG requested the DCC confirm the approach used during the delivery of deployment changes like Price Change events and the considerations used to mitigate the impact to the volume of traffic paused.

GBCS 4.2

The DCC informed members of a consumer-impacting defect identified while testing the GBCS 4.2 firmware release for a CSP C&S CH variant.

The OPSG agreed to the DCC's recommendation to fix the defect in a future CH firmware release and the OPSG Chair agreed to provide OPSG feedback to the TAG (Test Advisory Group) Chair on this subject.

DCC Service Non-Compliances

The DCC provided an update on seven ongoing non-compliances. A new compliance issue was raised relating to gaps in the Smart Meter Wide Area Network (WAN) coverage.

The OPSG noted a risk for energy suppliers in complying with Smart Meter GSoP requirements being set by Ofgem, as the SEC and CSP contracts do not align.

The OPSG agreed to review increasing risk R006 'Ofgem GSoP changes' to the highest scoring to emphasise visibility to the SEC Panel.

November 2025 SEC Release

The DCC presented an overview of the LSC for the November 2025 SEC Release, alongside the timescale for its implementation. The DCC confirmed all testing was completed and approved, with no open Incidents or risks identified.

The OPSG endorsed the proposal for the Release to be implemented as planned.

Manufacturing Pack 2

The DCC provided an update on the Manufacturing Pack 2 (MP2) programme, setting out the view that a production pilot was not necessary due to some CHs nearing end-of-life.

The OPSG noted the update and requested more clarity on the customer feedback in relation the proposal, and to return to the OPSG with justification for any changes to the agreed LSC approach, ensuring alignment with SEC governance.

SRV Batching

The DCC provided its plan to implement SR batching to reduce Short Message Service (SMS) costs.

The OPSG endorsed the DCC's proposed approach to gather further feedback and requested that the DCC engages all impacted DCC Users on its plans, and to return to the OPSG with an update before any cost of implementation is incurred.

ESSI (Enduring Systems and Service Integrator) procurement

The DCC presented an update on the development of a new business case for the Enduring Systems and Service Integrator (ESSI) to improve change management and mitigate the complexities caused by the DCC's disaggregated service provision model.

The OPSG noted the update and raised concerns regarding cost and procurement strategy, advising the DCC that the topic be escalated to the SEC Panel for a detailed review before progressing and that the DCC should postpone any further interaction with SEC Sub-Committees until this information has been reviewed, and direction provided, by the Panel.

Maintenance Release 2

The DCC outlined the revised scope for the 4G CH Maintenance Release 2 (MR2) firmware release. The DCC confirmed three items from MR2 have now moved to MR3 for efficiency and to reduce the complexity of MR2 scope, confirming the estimated delivery timescale for MR3 would be during the 2026/27 financial year. The DCC also confirmed 4G diagnostic data will be available before MR2 and that the DCC will engage industry to define any extra requirements before finalising MR3 plans.

The OPSG endorsed the DCC's revised MR2 scope, supporting the deferral of three items to the MR3 Firmware Release.

Security Sub-Committee (SSC)

The SSC reviews the outcome for User Security Assessments and sets an Assurance status for Initial Full User Security Assessments (FUSAs) or a Compliance status for Verification User Security Assessments (VUSAs), and subsequent FUSAs. The SSC also reviews outstanding actions, monitors the risks to the Commercial Product Assurance (CPA) certification of Devices, considers available updates from the DCC on the security implications of proposed changes and Anomaly Detection and any reported changes in Shared Resource Providers by Users and reported Security Incidents and vulnerabilities.

The SSC has met twice since the previous SEC Sub-Committee Report on 24 September and 8 October, and discussed the following topics:

DCC CIO Assessments, Forward Look and Remediations

The SSC was updated on the DCC Competent Independent Organisation (CIO) Forward Look and Remediations and noted the update and noted information on the scheduled assessments.

The SSC set the Compliance Status for one DCC CIO Security Assessment.

DCC Triage Security Controls Framework

SECAS provided the SSC with an outline on the amendments to the Triage Security Controls Framework (TSCF). The SSC confirmed that there are no objections to accepting the amendments and publishing the TSCF on the SEC website.

Certified Products Assurance (CPA) scheme

The SSC Chair provided an update on Certified Products Assurance (CPA) Scheme Operator Work in Progress, and the SSC noted the update.

The SSC Chair provided an update on CPA Scheme issues, noting a potential vulnerability. SSC Members noted the update and provided feedback.

Anomaly Detection Report

The DCC presented its six-monthly rolling Anomaly Detection report, including updated value and rate observations from the previous month, which the SSC noted. The DCC proposed a change to Global Anomaly Detection Thresholds and the SSC agreed to the proposed change.

Post-Commissioning Report

The DCC presented the monthly post-commissioning report and gave an overview of Post-Commissioning Obligation (PCO) failures and Certificate rotation activity, which the SSC noted.

The DCC presented a proposal to submit the Post Commissioning Report as a monthly below-the-line paper and present to the SSC quarterly and as required. The SSC agreed to the proposal.

CPA Risk Review

The SSC Chair presented the CPA Risk Review Tracker and an update on the CPA Risk Reviews. The SSC agreed to the outcome.

Use Case 005

The DCC presented members with the updated DCC 'Use Case 005 Triage Specification Document'. SSC Members provided feedback on the documentation. The DCC acknowledged the comments and confirmed that this item would return to a future SSC.

Trial Device Application

The SSC Chair presented an update on a Trial Device Application, which the SSC noted. The SSC Chair also presented a new Trial Device Application for two Devices. The SSC noted and approved the applications.

DCC2 License Changes

The SSC received an update on the proposed licence amendments in the DCC2 Licence. The DCC shared four key changes across physical security, operational location of the licensee, service provider and a register of security incidents. The SCC agreed there were no security-based objections, subject to the legal drafting of the suggested amendments.

FCN

The DCC shared an update on security risks associated with the Future Connectivity North (FCN) approach and the SSC noted the update.

SMKI Repository

The DCC presented a proposal for a SMKI Repository Policy Enforcement Point (PEP) Merger, and the SSC agreed that there are no security objections.

ECS

The DCC delivered a quarterly progress update on the Elective Communications Service (ECS) Reporting, and the SSC noted the update.

DCC Connect

The DCC provided a status report of DCC Connect activities and were requested to undertake a risk review and cost analysis evaluation for consideration at a future SSC meeting. The SSC noted the update.

Security Risk Assessment

SECAS issued an update on the annual end-to-end Security Risk Assessment. The SSC agreed on the scope and deliverables and recommended the paper be presented to the Panel.

Security Architecture

SECAS provided the SSC with information on the updates to the Security Architecture document, noting that the previous SSC comments and feedback had been addressed. The SSC approved the documentation as final, and confirmed the project is now complete subject to receipt of the updated Security Requirements Document.

VWAN

SECAS presented the proposed approach for the qualification application form to meet the requirements of the proposed DESNZ amendments to the SEC Section F expected to be designated from 17 October 2025. SSC Members provided feedback and agreed with the proposed approach.

The DCC presented the Trial Device Certificate application request for the VWAN Soft Launch. SSC Members provided feedback and the DCC confirmed that they would return to the SSC for further decision.

The DCC provided information on the contingency proposal for Manual reflash of VWAN CH firmware ahead of Soft Launch noting the VWAN project contingency plan. SSC Members provided feedback which the DCC noted.

The DCC presented the VWAN Risk Assessment. SSC Members noted the assessment and provided feedback. The DCC confirmed they would address the comments.

3.4 SMKI Policy Management Authority (PMA)

The SMKI PMA receives updates from the DCC, DESNZ and other Sub-Committees on matters of relevance to the SMKI arrangements. The SMKI PMA has met once since the previous SEC Sub-Committee Report, on 8 October, and discussed the following topics:

National Grid Gas – Incorrect Certificate Removal

The DCC gave an update on a Gas Networks Certificate Issue, noting a report into this issue is currently under development and delivery is expected for November. The SMKI PMA noted the update.

Apex Key Management

The DCC presented an update on an Apex Recovery pre-testing issue and presented two viable workaround options which the DCC is considering. The DCC is continuing testing in October and will deliver a further update to the SMKI PMA in November. The SMKI PMA noted the update.

The DCC shared a proposal to replace Apex Certificate Compact Discs (CDs) with encrypted Universal Serial Bus (USB) devices and outlined the procedural elements and responsibilities needed to achieve this outcome. The SMKI PMA noted no security objections to the proposal, on the condition that the DCC satisfies the adequate testing requirements of the replacement.

Custodian Key

The DCC presented a Key Custodian nomination to fill an existing vacancy. The SMKI PMA approved the Key Custodian nomination.

SPOTI Decommissioning Assurance

The DCC updated the SMKI PMA on the progress of the SMKI Portal Over the Internet (SPOTI) decommissioning process, noting that a detailed update is expected for November. The SMKI PMA noted the update.

3.5 Performance Assurance Board (PAB)

The main duties of the PAB are to effectively manage and mitigate risks, ensure compliance, and maintain confidence among all Parties involved.

The PAB met once this month on 8 October 2025 and discussed the following topics:

Data Communications Company (DCC) Performance Measurement Report (PMR)

The DCC provided an informational briefing to the PAB on the structure and content of the DCC PMR. The presentation aimed to familiarise members with the metrics and reporting mechanisms currently in use, highlighting how performance is tracked for performance of various aspects of the DCC Service. This session served to bridge current reporting practices with future assurance considerations.

PAF Service Provider Procurement

The PAB Chair provided the PAB with an update on the sessions that have been held by Horizon 7, SECCo and each supplier since the PAB attended the supplier workshops. A decision on who the contract will be awarded to will be made by the end of October and finalised for the SEC Panel in November.

3.6 Privacy Sub-Committee (PSC)

The Privacy Sub-Committee (PSC) and Panel has delegated relevant SEC Section I Obligations. Duties follow a similar remit to the SSC but also cover data ethics, emerging technologies, a privacy statement of objectives and a consent strategy.

The PSC met once this month on 18 September, and discussed the following topics:

In-Flight Assessments, Remediation Plans, Change Notifications and Forward Look (RED)

The PSC noted an update on current in-flight assessments, ongoing Privacy Change Notifications and the Assessment Forward Look.

Privacy Risk Register Review - Update

SECAS presented members with an update on the actions related to the Privacy Risk Register. PSC members agreed with the recommendations and the approach SECAS was taking. A further update will be brought to the next PSC meeting in October.

DCC CoT and CoS Processes Overview

The DCC provided members with information on the Change of Tenancy (CoT) and Change of Supplier (CoS) processes and explained the SEC DCC User Interface Specification (DUIS) mandated DCC system behaviour associated with a successful SR notification - SR6.23 (CoS) and SR3.4 (CoT). Members provided feedback on the presentation and thanked the DCC for the clarifications regarding the impacts and considerations for Other Users.

Privacy Control Framework (PCF) Amendments

SECAS provided members with the Privacy Controls Framework (PCF) amendments proposed to align the PCF with SEC I1.4 changes as a result of MP264 Implementation. The PSC agreed that that v2.15 can be published subject to consultation with Industry in accordance with SEC I 2.16.

MP234: Addition of GDPR Principles of Public Task and Legitimate Interests into the SEC

SECAS presented members with an update on the Legal text drafting for [MP234 'Addition of Public Task and Legitimate Interests into the SEC'](#), noting that updates reflected the legal advice regarding treatment of personal versus commercial data in relation to the General Data Protection Regulations (GDPR). The PSC provided feedback and agreed further engagement with the SECAS Legal Team was needed to address the points raised by PSC prior to the modification progressing to refinement consultation stage.

Modifications Update

The PSC were provided with an update on the new modifications as well as modifications impacting the PSC. Members noted the update. Members queried whether modification [MP235 'Enhanced Meter Data Access for Other Users'](#) could progress in parallel with MP234, noting that the legal drafting wouldn't be drafted until agreed for MP234 drafting was reached. SECAS took an action to confirm whether it was possible to progress MP235 without the legal drafting in this instance.

DESNZ Smart Metering Policy Framework

The PSC Chair presented members with an overview of the Smart Metering Policy Framework consultation noting the general privacy and consumer aspects associated with the sections of the report which may be of relevance for the PSC. Members noted the update and agreed no action was required at this time, but the progress of the consultation and outcomes would continue to be monitored.

SEC Section I Workshop Review

The PSC Chair presented an update on the SEC Section I review and asked members to provide feedback and suggestions on some key considerations on privacy matters. PSC members provided feedback and the Chair agreed to draft a paper for the next PSC meeting considering the impacts of Data Best Practice on SEC I, noting which elements sit in the data protection realm and therefore under PSC and SEC I remit, and any items where responsibility will need to be delegated by SEC Panel.

3.7 Customer Challenge Group (CCG)

The Customer Challenge Group (CCG) has been established to strengthen the voice of SEC Parties under the forthcoming 'ex ante' model of DCC Price Control. The main duties of the CCG are to:

- Provide effective challenge and feedback to DCC on its draft Business Plan (prepared under LC 34A of the DCC Licence).
- Provide a view to Ofgem on behalf of the DCC's customers and consumers to assist Ofgem's assessment of the DCC's Price Control submission.
- Monitor the DCC's delivery of the approved Business Plan.
- Provide feedback to the DCC and a view to Ofgem on any reopener applications for adjustment to the Allowed Revenue submitted by DCC.

The CCG has met twice since the last Sub-Committee report on 23 September and 7 October, and discussed the following topics:

Roadmap and Heatmap

The Chair presented the outline roadmap for the DCC draft Business Plan and highlighted that the DCC expect to submit the final Business Plan to Ofgem in mid-December 2025. The CCG discussed key considerations arising from the CCG's initial feedback on the draft Business Plan, including areas for focus and noting omissions. The CCG began discussions on how the key topics should be addressed and prioritised.

The Chair presented the heatmap which listed the Service Families set out in the draft Business Plan against the key themes on which the CCG had agreed to focus. Several Members had input priority ratings, and the CCG discussed these further, highlighting the SMETS2, Meter Data Management (MDM) and Internal Costs service areas as key areas of focus as well as the wind-down of SMETS1.

The CCG considered how the CCG's work can be scheduled to ensure the priority topics are covered. The key themes for the future meetings will include risks and forecasting, customer engagement, the DCC's ambition for service provision, outcome measures, and costs. The CCG agreed the schedule of topics for future meetings.

DCC Update

The DCC provided an update on the topics of customer engagement, DCC service proactiveness, forecasting and risk. The DCC emphasised its aim to better engage with customers, and its strategic ambition for a customer-centric approach. The DCC presented its approach to forecasting variable costs including Comms Hub cost forecasting, and the CCG challenged the method of forecasting for SMETS1 / SMETS2 transitioning.

The CCG requested further clarity on how risks are factored into the forecasting and noted potential risks during the transition between DCC1 and DCC2. The CCG emphasised the need for DCC to demonstrate it had taken on board customer feedback and was focused on cost efficiency. Overall, the CCG sought clarity on what the DCC was going to do differently to deliver continuous improvement for a stable and reliable system, cost efficiently and what would be the measures of success.

The CCG noted concerns that a lack of clarity remained around when the outstanding appendices will be available. Members stressed the need for a clear thread of customer engagement within the Business Plan, as well as the importance of the business plan demonstrating the DCC's awareness of the impact on end consumers.

Outstanding Information from DCC and Expected Timings

The DCC updated the CCG on the nine outstanding draft Business Plan Appendices and noted that work is ongoing to ensure the documents are of sufficient quality prior to sharing. The CCG expressed a preference to receive outstanding documents sooner, even if this meant figures may require subsequent updates or corrections. The CCG acknowledged the challenge faced by the DCC in preparing the draft Business Plan within a constrained timeframe, and the impact this had on producing the additional documentation such as the appendices. However, the CCG also noted its own limited timeline for review and emphasised the importance of receiving documents promptly to allow sufficient time for consideration by the Group.