

January 2026 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. [Virtual Wide Area Network \(VWAN\)](#)
2. [Future Service Management \(FSM\)](#)
3. [Data Services Provider \(DSP\)](#)
4. [Enduring Change of Supplier \(ECoS\)](#)
5. [Device Issues Management](#)
6. [SMETS1](#)
7. [Outage Management](#)

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

1. Key Sub-Committee topics

Topic	Sub-Committee activities
Virtual Wide Area Network (VWAN) <i>Some consumers' premises fall outside of cellular/radio WAN coverage provided by the DCC network. These are known as 'no WAN' premises.</i> <i>The DCC has been DESNZ to develop the Virtual WAN (VWAN) solution to address this issue using a consumer's internet service to provide a connection to the DCC network.</i>	TABASC: DCC provided a demonstration of VWAN to the TABASC. SSC: DCC presented the SSC with the Trial Device Certificate application request for the Virtual WAN Communications Hib (VWCH) for VWAN Soft Launch, along with an update on the VWAN Risk Assessment: ➤ The SSC agreed that further work is required on the risk assessment, the DCC confirmed it will action the feedback provided. ➤ The first Virtual Wan Device (VWD) Certificate was placed on the SEC website on 9 January 2026. ➤ The SCC received an update on the VWAN Soft Launch Live Service Criteria, noting an update on the VWAN Risk Assessment Update and the VWAN Penetration Test Update. ➤ The SSC confirmed its acceptance of the VWAN CISO letter to support its LSC decision. ➤ The SSC reviewed the DCC VWAN Competent Independent Organisation (CIO) report and confirmed that there were no security issues that should prevent a positive recommendation to the SEC Panel. TAG: Reviewed the VWAN Delivery Plan and the TAG endorsed the proposed user testing durations as sufficient. ➤ The TAG approved VWAN Systems Integration Testing (SIT) completion for the VWAN solution. ➤ The TAG approved SIT completion for the VWAN Communications Hub (CH) fix. OPSG: The DCC presented its evidence to support the VWAN Soft Launch LSC and the proposed SEC Sub-Committee Engagement Plan: ➤ The OPSG agreed to provide its decision ex-committee decision by close of play Friday 16 January 2026.

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.

SSC: DCC presented information on the FSM penetration testing and LSC readiness:

- The SSC agreed that there are no remaining material risks to prevent migration of the Smart Metering Inventory (SMI).
- DCC confirmed that SMI Migration will commence on Thursday 11 December.

TAG: DCC presented the FSM SIT Phase 1 Test Completion Report (TCR) following the TAG's decision to reject Test Completion during TAG 133X on Wednesday 07 January 2026:

- The TAG conditionally approved FSM SIT completion.

OPSG: DCC advised that a considerable number of defects were found during SIT, mostly related to the SSMI (Service Management) portion of FSM:

- DCC stated it was working with the TAG to decouple testing areas and run SIT and User Testing in parallel, aiming to avoid any further implementation delays.
- The OPSG raised concerns regarding the end-to-end process, defect resolution, and operational impacts on Users.
- The DCC assured the OPSG that defects would be resolved before Go-Live and that lessons learned would be applied to future projects.
- The OPSG approved the DCC's request to extend the period of the required Low Impact Window (LIW) Planned Maintenance release to support implementation, noting the concerns raised and the need for ongoing updates to be provided to OPSG.

Data Services Provider (DSP)

The DCC's Data Services Provider (DSP) system is a central facility that controls the flow of messages to and from smart metering equipment.

The contract for the current DSP solution is set

TABASC: DCC presented a review of the DSP re-procurement programme to date, including the core scope of the project and the Modular DCC User Interface Specification (DUIS) delivery to date:

- DCC and IBM presented the DSP blueprint, and learnings since the start of the project. IBM outlined the application of the Programme Increment 1 scope and gave an overview of the testing and execution environments.
- DCC and CGI presented an introduction to the Systems Integrator (SI) and outlined the key areas of scope. CGI demonstrated Artificial Intelligence (AI) Tools as a managed testing solution, including AI-powered test generation, intelligent gap detection and a defect analyser.

SSC: DCC presented information on the DSP Install and Commission Migration and provided an update on the proposed options for migration of Access Control Broker (ACB) Certificates:

<i>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>	➤ DCC also provided a presentation covering how DCC will enable Post-Quantum resiliency and hardening within aspects of the “To Be” DSP. ➤ The SSC provided feedback and agreed that the item should be revisited at a future SSC. SMKI PMA: DCC provided an overview of the DSP 1 to DSP 2 migration process, and shared its assessment of three options for migration of specific cryptographic signing Keys and presented a preferred option: ➤ There were no immediate SMKI governance concerns raised by the SMKI PMA, and it conditionally approved the proposal, awaiting input from the SSC. ➤ The SMKI PMA agreed to approve amendments to the PKT diagram.
Enduring Change of Supplier (ECoS) <i>ECoS was implemented to replace the Transitional CoS solution and enhance the security when a consumer switches from one energy supplier to another. An essential component of this is the replacement of certificates on Devices.</i> <i>Elements of the ECoS solution are now due to be reprocured via a DCC programme.</i>	TABASC: DCC presented the revised Problem Statement and User Business Needs for the ECoS re-procurement and noted that the revised statement now highlights ECoS’s role in broader activities, such as supplier switching and Supplier of Last Resort (SoLR) events: ➤ The TABASC confirmed that this better reflects the service’s nature. ➤ DCC updated on Private Key Portability, and the refined Business Needs split between essential and desirable needs. ➤ The TABASC requested better traceability of requirements and noted concerns around how limited key portability due to Hardware Security Module (HSM) constraints may impact Suppliers ability to operate the change of supplier process. ➤ The TABASC endorsed the Problem Statement, and the User Business Needs, but noted significant concern over potential stranding of Devices due to HSM constraints. SSC: DCC presented members with the ECoS Re-procurement, noting the Problem Statement and User Business Needs: ➤ The SSC noted the update and provided feedback. OPSG: DCC outlined the rationale for re-procuring the ECOS service, aiming to ensure the service remained fit for purpose and delivered value for money: ➤ The OPSG emphasised the importance of dividing procurement into lots, allowing for flexibility and potentially multiple Suppliers, while also considering the benefits of aggregation. ➤ The OPSG also discussed the need to include impacts on Meter Asset Providers (MAPs), and to ensure that all operational perspectives are considered. ➤ The OPSG endorsed the updated problem statement and User business needs.

Device Issues <i>Including any issues identified with installed Smart Metering Systems and Communication Hubs.</i>	OPSG: DCC reported around 800,000 non-communicating devices, broadly similar to previous reporting which consisted of WAN failures, Home Area Network (HAN) issues, Device faults, commissioning problems, and Organisation Device Certificates (ODC) issues affecting SMETS1 Devices: ➤ The OPSG noted continued frustration with the lack of visibility within the current reporting for certain Gas meter related issues such as those returning Service Request Variants (SRVs) with an empty payload. ➤ The OPSG requested the DCC to provide 4G coverage overlay for the non-communicating CHs where the Communications Service Provider (CSP) had confirmed they could not connect to the CH or were in CSP Triage. ➤ The DCC committed to producing that view. SMKI PMA: DCC provided an update on the investigation into the incorrect National Grid Gas Certificates on Devices and confirmed that there are no performance issues with the affected Devices. ➤ DCC noted that the root cause analysis remains ongoing.
SMETS1 <i>First-generation smart meters, also known as SMETS1 (Smart Metering Equipment Technical Specifications v 1).</i> <i>Many SMETS1 meters have now been incorporated into the DCC ecosystem to increase the functionality they provide when a consumer changes their energy supplier.</i>	TABASC: SECAS provided an update on MP304 'Scheduling Services for SMETS1 Devices (SRV 4.3)' and explained that this would enable SRV 4.3 'read instantaneous prepay values' for SMETS1 Devices to be scheduled, rather than 'on-demand' only: ➤ It was estimated that the change could deliver significant cost savings. ➤ DCC believes that Suppliers using 80% or more of the Short Messaging Service (SMS) will upgrade to schedule SRV 4.3, and development costs to Pre-Integration Testing (PIT) completion were provided. ➤ The TABASC discussed the cost impact and raised concern regarding the diminishing returns, as SMETS1 Devices will be gradually removed over the next five years. ➤ The TABASC requested more transparency on DCC's contract terms and benchmarks used but agreed that the cost-benefit case is strong. SSC: The DCC shared an update on the SMETS1 Middle Operating Capability (MOC) Decommissioning and Separation. ➤ The SSC was provided with information on the findings and observations which were presented in the CIO Report. ➤ SECAS provided an overview of MP312 'Caching SRV 4.10 for SMETS1 Devices', noting the usage estimates and forum views and confirmed the physical implementation of the SEC Modification will be April 2027. ➤ The SSC agreed that there were no significant security risks.

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: SECAS provided an update on [MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'](#) and explained that this had been raised to address operational challenges faced by Distribution Network Operators (DNOs) when Planned Maintenance coincides with adverse weather events:

- The TABASC noted that the implementation into the current DSP solution would be expensive, and that DSP2 will have significantly less downtime so this change is unlikely to be required for that solution.
- The TABASC supported the improvement of resilience during adverse weather but requested further benefit analysis to be carried out before it can make a decision on the proposed solution, considering cost, timing and operational benefit.

OPSG: DCC noted two Major Incidents (MIs) had occurred in November 2025; one was a Category 1 CSP incident caused by a planned system change that did not behave as expected in production, impacting services:

- DCC noted a Category 2 MI that impacted SMKI services caused by a database table reaching its maximum size.
- DCC also presented the MI Performance Summary for December 2025, along with an overall annual summary of 2025, including data comparing performance to previous years.
- DCC noted that two Category 2 MIs were encountered in December, impacting SMETS1 MOC and the CSP North.

DCC shared the 2026 – 2027 Annual Outage Plan, which included the Business Continuity and Disaster Recovery (BCDR) Schedule and the Planned Maintenance Schedule dates:

- The OPSG raised a concern about a proposed BCDR HIW outage date, and the DCC agreed to revise the date and reshare the amended plan.
- The DCC noted that because of an unforeseen event, a Planned Maintenance for 13 January had to be postponed and noted that this would take place on the already scheduled fall back date of 20 January 2026.
- The OPSG conditionally approved the Annual Outage Plan with the condition being that the HIW outage date queried will be rescheduled to more appropriate date and time.

2. SEC Change

2.1 Overview

Number of proposals in each stage of the modification framework:



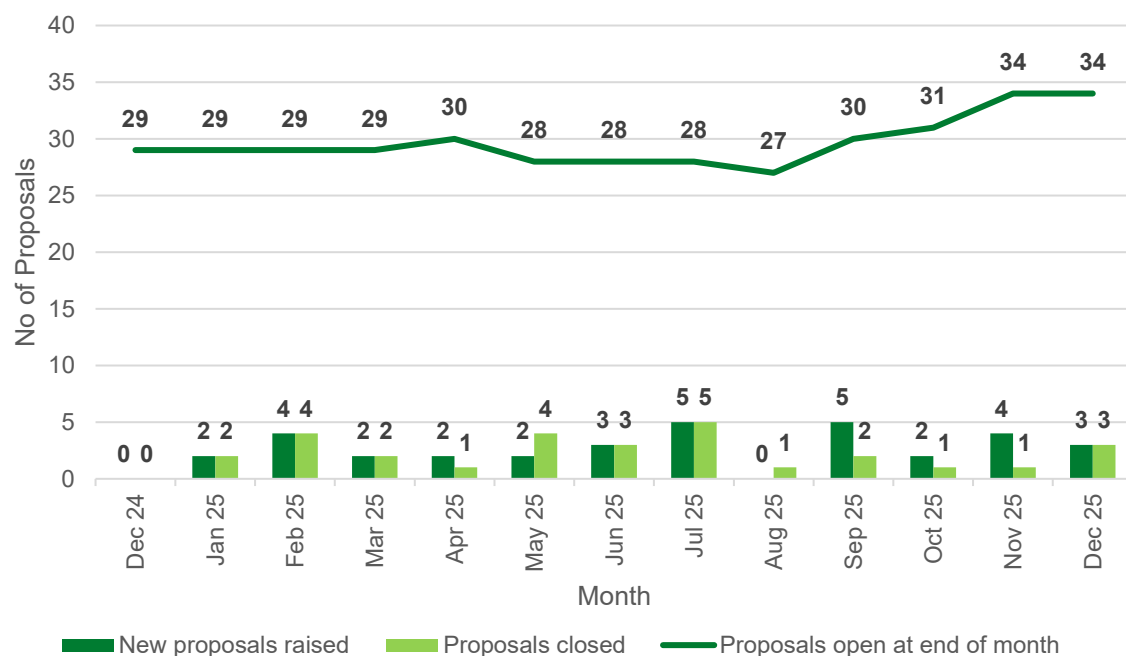
This stage is to identify and examine issues that SEC Parties have raised. When a problem statement is fully defined and the scale of the impact is known, the Draft Proposal is ready to progress to a Modification Proposal.

During this stage, a solution will be developed. We will work collaboratively with the Proposer and the DCC to create and assess this, with Working Group, Sub-Committee, and industry input.

This stage allows all SEC Parties to provide a view on whether the modification should be implemented before the Change Board votes to approve or reject the change.

To limit the impact to industry Parties, modifications are batched together into a "Release" of which there are three SEC Releases scheduled each year during February, June, and November.

Volume of proposals going through the modification framework:



2.2 Modification updates and points to note

Modification	Priority	Update
MP169 'Managing the Consumers refusal of a Smart Meter'	HIGH	A Request for Information (RFI) was issued to gather information about how this issue is dealt with currently. The responses are being considered by SECAS. SECAS is holding bilateral meetings with Parties, Ofgem, DESNZ, Citizens Advice, and the Ombudsman to find a way forward. Expected to move to Report in January 2026 but now delayed to March 2026.
MP218 'Review of the SEC Charging Methodology'	HIGH	This is in the Refinement Process. An ad hoc Working Group will be convened.
MP255 'WAN issues during Smart Meter installations'	HIGH	SECAS is working with the DCC to assess the develop the business requirements.
MP293 'Deferment of DCC Planned Maintenance during Adverse Weather'	HIGH	SECAS has requested the DCC Preliminary Assessment. This is currently expected to be returned by 4 February 2026. Once received SECAS will schedule this modification for discussion at the next monthly Working Group session.
MP300 'Additional Operational Metrics to Measure on Success'	HIGH	SECAS presented this modification to the Working Group on 3 December 2025. The feedback from the Working Group will be incorporated into the Modification report before SECAS agrees next steps with the Proposer.
MP302 'Supplier Alerts for ENOs'	HIGH	On 16 September 2025, the Change Sub-Committee 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 to the TABASC and OPSG.
DP311 'Additional Out of Region Communications Hubs Amendments'	HIGH	An ad hoc Change Board was held on 5 January 2026. The Authority approved this on 9 January 2026, and it was implemented on 12 January 2026.
MP312 'Caching SRV 4.10 for SMETS1 devices'	VERY HIGH	This modification was be presented to the January 2026 Working Group for discussion and will now be issued for a Refinement Consultation.

Change Board Quoracy

One Scheduled Change Board and two ad-hoc Change Boards have failed to achieve quoracy. This has mainly been due to the Christmas period and two modifications that required votes over this period. The Change Board nominations are currently in progress but once the seats are confirmed SECAS will be taking action to ensure all Members have an alternate and we have already put in place a more robust quoracy check before each meeting.

Ofgem Strategic Direction Statement (SDS) Prioritisation

We are starting to consider and discuss how the Ofgem SDS Prioritisation will affect our current method of prioritisation.

2.3 Change Sub-Committee decisions – December 2025

Modifications approved as Fast Track Modification:

- [MP309 'Housekeeping changes for Section G - Security'](#)
- [MP310 'Trial Device Assurance Certificate'](#)

Modifications moving to Report Phase:

- [MP304 'Scheduling Services for SMETS1 Devices \(SRV 4.3\)'](#)

Modifications moving to Refinement Process:

- [DP312 'Caching SRV 4.10 for SMETS1 Devices'](#)
- [DP313 'Remove the DCC requirement to delete CHs from the SMI'](#)

2.4 Change Board decisions – December 2025

The December 2025 Change Board meeting was postponed due to non-quoracy, this meant a final vote on MP303 was delayed until 28 January 2026.

Ad hoc Change Board decision on MP304 and MP311

An ad-hoc Change Board was held on 23 December 2025 but was postponed due to non-quoracy. This delayed the final vote for [MP304 'Scheduling Services for SMETS1 Device \(SRV 4.3\)'](#) and [MP311 'Additional Out of Region Communications Hubs Amendments'](#)

MP304 and MP311 were presented to the ad hoc Change Board on Monday 5 January 2026. MP304 was approved at Change Board and will be implemented in the November 2026 SEC Release.

The Change Board voted to recommend that the Authority approve MP311. Ofgem subsequently approved the modification on 9 January 2026. SECAS implemented the modification on 12 January 2026.

2.5 SEC versions issued and designations:

SECAS implemented the DESNZ Designation [SMETS1 Consultation - Clause retention beyond SMETS1 TMAD expiry and proposed amendments to the SMETS1 Supporting Requirements Cross-Code working](#) on 12 December 2025.

SECAS also implemented the DESNZ Designation [Smart Metering Implementation Programme: SEC Changes for 4G Communications Hub only exchange site visit DCC charging mechanism](#) on 18 December 2025.

SEC v128.0 was implemented on 12 January 2026 to implement [MP311 'Additional Out of Region Communications Hubs Amendments'](#).

Upcoming Designations

SECAS is awaiting the [Virtual Wide Area Network \(VWAN\) Soft Launch](#) in late January 2026.

2.6 Cross-Code working

Code Administration Code of Practice (CACoP) Forum update

The latest CACoP forum meeting took place on 11 December 2025.

The group reviewed the Horizon Scanner and Workplan, noting that the Scanner has not been updated since September 2023 and questioning its purpose and value given existing code-level reporting mechanisms. Members agreed it may no longer be necessary to maintain the Scanner or Workplan, unless required by governance, and suggested that linking to individual Code registers may be a more efficient alternative.

The Chair reported that the 2024 CACoP Survey publication was nearing completion, with remaining highlights still being collected and a final version to be sent for publication in the coming weeks. Members noted that very low response rates, limited insights, and competing industry priorities undermined the value of an annual survey and agreed to explore moving to a biannual approach pending governance and historic expectations.

The Forum reviewed proposed amendments to Principles 12 and 17, noting that the survey wording may need future revision depending on governance and survey appetite, while raising no objections to aligning Principle 17 with Ofgem's Data Best Practice Guidance. Members also requested additional updates, including incorporating REC's full redline to reflect both Code Administrators and Code Managers, and allowing UNC's new representative time to review the revised text.

The CACoP forum Chair will be replaced in the new year by NESO, in line with the one-year rotation.

A meeting will be held in February 2026, however, there has been no date confirmation.

Cross Code Steering Group (CCSG) update

The CCSG last met 3 November 2025. There were no new issues identified impacting from changes from other codes or vice versa.

3. Sub-Committee activities

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 three times since the previous SEC Sub-Committee Report, on 5 December, 7 January, and 14 January to discuss VWAN and FSM, which are included in Section 1 of this report [‘Key Sub-Committee Topics’](#).

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 9 December and 13 January, and discussed the following topics:

Risk Management

SECCo proposed to add three new risks to the Risk Register:

R008: 3G Sunsetting

The OPSG agreed to add this risk and to monitor for any operational incidents arising during the CSP Central and South (C&S) 3G switch off and to close this risk once the transition of smart meters to 2G was complete and no issues occurred.

R009: CH Deployment/Replacement Activities

The OPSG noted that energy suppliers are facing multiple overlapping and conflicting deadlines, creating operational risk and agreed that energy suppliers urgently need a unified, accurate single source of truth to plan against. The OPSG agreed for this risk to be added.

R010: 4G WAN Coverage

The OPSG noted that 4G WAN coverage is currently below the 99.25% contracted threshold, with projected improvement to reach 98% in April 2026 after roaming testing completes. The OPSG agreed to keep this as a risk, with the current severity set at 12, and to review as new data becomes available.

R011: Operational impact of the change of the DCC licence.

The OPSG noted that there is a risk that there may be Smart service disruption due to the transition of the DCC licence which is currently planned for November 2026. The OPSG agreed to add this risk with a severity score of 8.

Guaranteed Standards of Performance (GSoP)

The OPSG Chair presented the findings and recommendations from Phase 1 of the project and noted that the project had been split into phases due to the scale of the work required.

The OPSG raised concerns around the potential for Ofgem to implement its GSoP regulations before Industry was fully ready. The OPSG Chair advised that Ofgem would present its consultation outcomes to the Authority for approval on Wednesday 10 December 2025 and expected Ofgem to publish its decisions ahead of the 12 December 2025 moratorium deadline.

The OPSG approved the findings and recommendations.

DCC Price Control

The OPSG expressed strong concerns at being asked to comment without having a balanced picture, noting the consultation presented Ofgem's perspective and agreed that a balanced view that included the DCC's underlying evidence was needed for an informed opinion.

The OPSG raised concerns around performance measures in the framework not reflecting operational reality and suggested issues should be fed into the DCC2 Licence Consultation where performance metrics could be adjusted.

4G Communications Hubs & Networks (CH&N)

The DCC proposed a small, controlled Production Pilot of 4G roaming to validate roaming in real world conditions before full rollout. SECAS advised that TAG did not support enabling roaming in production before running SIT and UTS completes.

SECCo advised that the decision would need to go to the SEC Panel if TAG and OPSG had opposing views. The OPSG noted the update and the OPSG Chair confirmed discussions would continue offline internally with the DCC and an update would be communicated to Members.

Manufacturing Pack 2 (MP2)

The DCC advised that a Workshop was scheduled for 15 December 2025 with the DCC and Energy Suppliers to discuss MP2 engagement and endorsement.

The OPSG questioned whether ECOS had been updated, noting failures observed by Test Participants, particularly on Gas meters. The DCC confirmed it would review those issues internally and it would be discussed at the upcoming Workshop.

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 9 December to discuss SMETS1, Outage Management, ECoS, VWAN, and the DSP, which are included in Section 1 of this report ['Key Sub-Committee Topics'](#).

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 10 December and 14 January, and discussed the following topics:

DCC CIO Assessments, Forward Look and Remediations

The SSC approved one DCC Security Assessment Remediation Plan & Director's Letter. The DCC CIO provided an update on the DCC CIO Forward Look.

Certified Products Assurance (CPA) scheme

The SSC Chair presented updates on CPA Matters. The SSC provided feedback and agreed the outcomes.

Device Matters

The SSC Chair presented an update on Device matters, and the SSC noted the update.

Security Architecture

The SSC Chair presented members with the draft Security Architecture Briefing Note. Members provided feedback on the sections.

During a subsequent meeting SECAS confirmed that the Security Architecture Document (SAD) had been amended to reflect feedback that SSC members had provided. The SSC approved the updated version for publication.

DCC Licence

The SSC Chair presented information on a request from Ofgem for SSC advice on security aspects relating to the DCC Licence consultation, and highlighted areas for SSC input to DCC proposed changes. Members reviewed the DCC proposals and Ofgem questions; and agreed to provide a response to Ofgem.

Trial Devices

The SSC Chair presented the SSC with Trial Device applications, and the SSC agreed upon the outcome of the Trial Device applications.

Post Quantum Computing

The SSC was provided with the Post Quantum Computing Working Group (PQCWG) Terms of Reference (ToR). Members noted the ToR and confirmed that it would provide feedback.

Security Incidents

SECAS noted that there were no Security Incidents and Vulnerabilities reported since the last SSC Meeting.

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 twice since the previous SEC Sub-Committee Report, on 10 December and 14 January, and discussed the following topics:

Apex Recovery Exercise

The DCC presented an update on the Apex Recovery Exercise, discussing a testing issue and providing an overview of the ongoing investigation into remediating this issue.

Key Custodians

The SMKI PMA Chair presented a new Key Custodian Nomination Form and the SMKI PMA agreed to approve the Key Custodian Nomination.

The DCC presented updates on the implementation of hardware and infrastructure to support remote Key Custodian Service and noted the request from SMKI PMA to ensure Key Custodians were given as much notice as possible regarding planned Key Recovery events to support planning for attendance. The DCC confirmed that communications are being drafted to issue the Key Custodians as soon as possible to support the event planned to enable the remote service.

Public Key Infrastructure

The DCC provided a diagrammatic representation of online and offline SMKI back-up and storage locations, and the SMKI PMA agreed to close the related action.

The DCC presented amendments to a Public Key Transfer (PKT) diagram and the SMKI PMA provided no objections to the proposed changes. The SMKI PMA agreed to approve the PKT diagram.

Supplier of Last Resort (SoLR)

The SMKI PMA Chair provided an update on the SoLR event for Tomato Energy Ltd and noted that all certificates have now been revoked.

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 twice on 10 December and 14 January to discuss the following topics:

PAB Terms of Reference

The PAB Chair invited members to comment on the current ToR, which will be reviewed and updated in the new year. To strengthen cross-code collaboration, the Chair confirmed that Performance Assurance representatives from the Retail Energy Code (REC), Balancing and

Settlement Code (BSC), and Uniform Network Code (UNC) will be added as PAB members.

In January, a joint project involving representatives from all four codes will explore approaches to aligning assurance functions. Depending on the outcomes, the ToR may be revised further. The Chair also highlighted that references to Gas and Electricity Network Parties will be broadened to cover Network Parties in general, ensuring flexibility for any future changes, including the potential removal of Gas Network Parties from the SEC.

A paper outlining these changes will be presented to the PAB in the new year once the project has concluded, followed by submission to the SEC Panel for formal approval of the updates.

PAF provider update

The PAF provider, Moorhouse, presented a draft PAF mobilisation plan that will commence in January 2026. A refined plan will be presented in the new year for formal approval.

Moorhouse presented a PAF stakeholder engagement plan that will commence in January 2026. A refined plan will be presented in the new year for formal approval.

Moorhouse presented a proposal for a PAF PoC to be undertaken in Q1 2026. The activity will focus on a single risk and a limited group of SEC Parties, enabling selected PAF processes to be tested while they are still in development.

Cross-Code Disclosure of Party Performance

The PAB Chair presented an update on a proposal for Cross-Code Disclosure of Party Performance with other Code Bodies, including the UNC, BSC, and REC. The PAB Chair highlighted next steps, noting that a series of workshops with other Code Bodies would take place to further discuss the proposal and interim recommendations would be presented to the SEC PAB in February 2026.

The PAB provided feedback on the update and expressed support for Cross-Code Disclosure.

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 three times since the last Sub-Committee report on 16 December, 6 January, 13 January, and discussed the following topics:

Engagement with Sub-Committee Chairs

The CCG Chair updated the CCG on the outcome of meetings with the Chairs of the SSC, OPSG, CTG, TABASC, and TAG.

The CCG noted that there was no unexpected feedback from the Sub-Committee Chairs, and was satisfied that the CCG's review of the Business Plan has captured the key points raised by Sub-Committee Chairs.

Review of Ofgem's ToR List of Potential Questions for the CCG

The CCG reviewed the potential questions set out in the CCG's ToR (Appendix 1), suggested by Ofgem for the CCG's consideration when it reviews the final Business Plan. The CCG discussed each question in relation to the draft Business Plan and assigned a score for each on a scale of 1 to 5, to map out gaps and areas for improvement. The Group acknowledged that the values assigned relate to the draft Business Plan and expects these values to change when the final Business Plan is reviewed.

Key Lines for the CCG Report

The Chair led a discussion on the CCG's view of certain limited areas within its report, that will not be impacted by the final Business Plan, including the DCC's engagement with the CCG, the overall process for the development of the Business Plan and CCG's involvement in that, and the DCC's Stakeholder engagement on the Business Plan. The CCG noted the open and professional attitude from the DCC's representatives when engaging with the Group and that their approach had been positive throughout the DCC's engagement with the CCG. Members again noted the truncated timeline for CCG review and also noted that the stakeholder engagement had been focused on the DCC updating stakeholders, rather than asking for feedback.

January Roadmap and Plan to 30th January

The Chair presented an updated Roadmap and the key dates for January 2026. It was proposed that the Chair and Subject Matter Experts author the CCG's Report, and that the CCG then review it and provide final sign-off. The CCG agreed the Report-writing process.

DCC Business Plan

The CCG agreed that there was improvement from the draft Business Plan, and that the direction of travel is positive. The CCG noted that some points of focus remained missing from the final version of the DCC Business Plan, including details on outcome measures and contract management strategy.

Although it was acknowledged that the DCC is currently in a transitional period, the CCG expressed disappointment that several key themes – including responses to customer feedback and assurance that costs were efficiently incurred – are not evidenced sufficiently within the Final Business Plan.

The CCG discussed changes to the Business Plan from draft to final versions. The CCG noted that there is little by way of additional detail underpinning external costs, which represents a significant portion of the total costs within the plan. While large projects are mentioned, individual contracts and supply chain details are not broken down. The CCG considered that risk assessments are not transparent for major contracts, with only the DSP risk specifically mentioned. The impact of stakeholder feedback is not clearly articulated, with lack of demonstration of how it informs business planning. The CCG noted that details of the DCC's engagement with the group had been added and that this engagement had benefitted the plan overall.

Draft CCG Report

The CCG reviewed the first draft CCG Report and the chapters currently drafted including background, process and comments raised on the draft Business Plan, noting that key commentary on the final Business Plan was outstanding. The CCG noted that the structure of the report is good and provided feedback on the draft content. The CCG highlighted the importance of noting where the Business Plan meets or exceeds expectations, as well as areas where expectations have not been met.

At a subsequent meeting the CCG reviewed the changes made to the CCG Report since the previous draft. Members noted the key themes that should be addressed. There was a specific discussion of the current reporting metric of 'cost per meter'. The CCG highlighted recurring concerns such as the lack of demonstration of stakeholder impact and lack of ambition within the cost savings.

The CCG considered whether the Business Plan is sufficient to maintain essential operations during the Business Plan period and agreed that it is. However, the Group felt that significant concerns remain regarding its overall quality and completeness.

Review of Feedback Log

The CCG discussed the next steps regarding the Feedback Log, and whether it should be published in its entirety as part of its Report. The CCG agreed that more time to review the final Business Plan against the Feedback Log would be beneficial, and that this should be further discussed at the next meeting of the CCG.

DCC Update

The DCC noted that the CCG's engagement advanced the Business Plan in multiple areas and that the Group's input had been valuable. While acknowledging that the final Business Plan is an improvement from the draft version, the DCC recognised that it was their first Ex-Ante, not for profit Business Plan and that it was capturing improvements which would be reflected in future Business Planning periods. The Chair acknowledged the significant effort the DCC Representatives had invested in engaging with the Group and supporting improvements to the Business Plan. The Group noted that some areas of material concern remain, and these will be reflected in the CCG Report.

Key Messages to present to the SEC Panel

The CCG Chair noted that a redacted version of the CCG's Report will be presented to the SEC Panel on 27 January 2026 and explained the timetabling to enable the report to be presented. The Chair highlighted under the CCG ToR that the SEC Panel cannot request any changes to the report but can seek clarification.

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 December, and discussed the following topics:

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

The PSC noted an update on current in-flight assessments, ongoing Privacy Change Notifications.

PSC 2025 Review

SECAS presented members with an overview of the PSC 2025 activity, highlighting key achievement areas and contributions from members over the year.