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Action:	For Discussion

MP301 – Proposed Solution

1. Purpose

The purpose of this paper is to gather the Technical Architecture and Business Architecture Sub-Committee (TABASC) views on the Proposed Solution for [MP301 – ‘Review of Additional Registration Data \(Gas Transporters\)’](#).

2. Summary of MP301

This section summarises the key points of this Modification Proposal. More information is available in the Modification Report in Appendix A.

2.1 What is the issue?

Gas Network Parties accede to the Smart Energy Code (SEC) as part of their obligations under their licence from Ofgem. The Proposer (a Gas Network Party, hereafter referred to as GNP) has identified that GNPs have few very explicit obligations under the SEC; only two, relating to the provision of Additional Registration Data to the Data Communications Company (DCC). These obligations are found in SEC Section E – ‘Registration Data’, under Clauses 5.3 and 5.4:

E5.3 Each Gas Network Party shall with effect from calendar month October 2020 provide (or procure that its Registration Data Provider provides) to the DCC by no later than the last day of each calendar month (the ‘relevant calendar month’) the data referred to in Section E5.4 in respect of each Gas Supplier Party.

E5.4 The data to be provided to the DCC by the Gas Network Party in accordance with Section E5.3 is the number of Supply Meter Points on its network that relate to Designated Premises at which:

- (a) the Gas Supplier Party is Registered on the 15th day of the relevant calendar month; and*
- (b) the quantity of gas supplied to the premises is measured by a Gas Meter that is an Advanced Meter,*

The Proposer has suggested that these obligations could be transferred from the SEC into the Retail Energy Code (REC), as the Additional Registration Data relates to Data found within the REC. In this way, GNPs may be able to withdraw from the SEC entirely, reducing their overall regulatory burden.

SECAS has identified that GNPs have additional, albeit less explicit obligations and roles within the SEC than the two obligations found in SEC Section E.

By merit of having acceded to the SEC, Gas Network Parties are also eligible to become DCC Users, as prescribed by SEC Section H – ‘DCC Services’:

H1.1 Many of the Services described in this Section H are described as being available only to Users. A Party is not entitled to receive those Services until that Party has become a User by completing the User Entry Process.

H1.2 Only persons that are Parties are eligible to complete the User Entry Process and to become Users.

As a result, should a GNP secede from the SEC, they would forfeit the right to become a DCC User, and would not be able to benefit from DCC Services. This may be impactful where GNPs need to communicate with Smart Metering Systems via Service Requests (SR). SEC Appendix AD - ‘DCC User Interface Specification’ (DUIS) defines the technical and operational interface requirements between the DCC and its Users, ensuring consistent, secure, and interoperable communication for SMS services. It references SRs in Section 3.1 ‘Service Request Matrix’ where a GNP is eligible to submit an SR:

Service Request Name	Service Reference
Read Instantaneous Import Registers	4.1
Read Instantaneous Import TOU Matrices	4.1
Read Active Import Profile Data	4.8
Read Network Data	4.10
Retrieve Daily Consumption Log	4.17
Create Schedule	5.1
Read Schedule	5.2
Delete Schedule	5.3
Read Device Configuration (Identity Exc MPxN)	6.2
Read Device Configuration (MPxN)	6.2
Read Device Configuration (Gas)	6.2
Read Event Or Security Log	6.13
Update Security Credentials (KRP)	6.15

Service Request Name	Service Reference
Retrieve Device Security Credentials (KRP)	6.24
Read Supply Status	7.4
Read Inventory	8.2
Update Inventory	8.4
Read Firmware Version	11.2
Request WAN Matrix	12.1
Device Pre-notification	12.2
Record Network Data (GAS)	14.1

Whilst the Proposer has indicated they do not believe GNPs interact with SMS' as part of their BAU operations, initial conversations between SECAS and the DCC do indicate that there is a small, but non-insignificant amount of traffic sent by GNPs via the above SRs. SECAS will therefore need to consider how GNPs, DCC, and SEC Parties more broadly, will be impacted by GNPs losing their ability to communicate with SMSs via SRs.

2.2 What is the impact?

The Proposer has told SECAS that the regulatory and operational requirements on their organisation that result from Code membership are not proportional to their level of obligation under the Code. As a result, they feel that being able to transfer these obligations from the SEC into the REC would reduce the impact on their organisation that stem from Code membership.

SECAS will work with the DCC during development of the solution to ensure that should the obligations for submission of Additional Registration Data by GNPs to the DCC move from the SEC to the REC that there would be continuity in the supply of this information to them.

As stated in the above section, the Proposer has also told SECAS they do not communicate with SMS and as such would not be impacted by leaving the SEC, following a removal of their Section E obligations. SECAS will work with the DCC to determine the extent to which a change in GNP traffic would affect them.

2.3 What is the Proposed Solution?

The Proposer has suggested that Additional Registration Data obligations are transferred from the REC to the SEC, as per the below:

SEC Section E – 'Registration Data':

~~E5.3 Each Gas Network Party shall with effect from calendar month October 2020 provide (or procure that its Registration Data Provider provides) to the DCC by no later than the last day of each calendar month (the 'relevant calendar month') the data referred to in Section E5.4 in respect of each Gas Supplier Party.~~

~~E5.4 The data to be provided to the DCC by the Gas Network Party in accordance with Section E5.3 is the number of Supply Meter Points on its network that relate to Designated Premises at which:~~

- ~~(a) the Gas Supplier Party is Registered on the 15th day of the relevant calendar month; and~~
~~(b) the quantity of gas supplied to the premises is measured by a Gas Meter that is an Advanced Meter,~~

TBD REC Schedule:

~~X.X1 - Each Gas Network Party shall with effect from calendar month October 2020 provide (or procure that its Registration Data Provider provides) to the DCC by no later than the last day of each calendar month (the 'relevant calendar month') the data referred to in Section E5.4 in respect of each Gas Supplier Party.~~

~~X.X2 - The data to be provided to the DCC by the Gas Network Party in accordance with Section X.X1 is the number of Supply Meter Points on its network that relate to Designated Premises at which:~~

- ~~(a) the Gas Supplier Party is Registered on the 15th day of the relevant calendar month; and~~
~~(b) the quantity of gas supplied to the premises is measured by a Gas Meter that is an Advanced Meter,~~

This Modification is being conducted on a cross-code basis, where the Retail Energy Code has been designated by the Cross-Code Steering Group as the lead code. As such, SECAS will work closely with the REC Code Manager to determine how the obligation may be transferred, should this solution prove viable. The current unified approach is to first determine whether the SEC may surrender the obligation and then determine if the REC is able to accept it.

The initial SECAS determination (informed following conversations with the DCC) is that there is no need to modify the DUIS to remove GNPs as viable users from the Service Request Matrix, to allow for any GNP that does not wish to leave the SEC to have continued access to existing functionalities.

3. Questions for the TABASC

We seek the TABASC's input on the following questions to feed into the Modification Report:

- Does the TABASC see any issues arising from the implementation of this Modification?
- Does the TABASC have any views on the proposed solution?
- Does the TABASC have any views on the impact of the proposed solution?

4. Next steps

SECAS will present this Modification at Working Group to understand views on the proposed solution. SECAS will work with the REC Code Manager to understand how these obligations may be transferred. SECAS is also working with Ofgem to understand how the broader impact of GNPs leaving the SEC may be understood.

5. Recommendations

The TABASC is requested to:

- **PROVIDE** feedback on the issue outlined as part of MP301.

Lydia Bentley

SECAS Team

25 September 2025

Attachments:

- **Appendix A:** MP301 Modification Report v0.1