

This document is classified as **Clear** in accordance with the Panel Information Policy. Recipients can distribute this information to the world, there is no limit on disclosure. Information may be shared without restriction subject to copyright.

‘Extension of MP219 ‘Accessing Consumption Data on behalf of SEC Parties’ concept to section I1.3’

October 2025 Issues Group – Meeting Summary

Attendees

SEC Party Category	Working Group Members	Representing
Large Suppliers	Andrew Firth (AF)	Centrica
	Emma Johnson (EJ)	Centrica
	Julie Brown (JB)	Centrica
	Sharon Armitage (SA)	EON
	Ralph Baxter (RB)	Octopus Energy
	Mahfuzar Rahman (MR)	Scottish Power
	Kevin Clark (KC)	Utilita
Small Suppliers	Steve Blackler (SB)	E Gas & Electricity
Other SEC Parties	Patricia Massey (PM)	BEAMA
	Beth Tatton (BT)	Calisen
	Daniel Davies (DD)	ESG Global
	Martin Bell (MB)	EUA
	Kirsty Maddock (KM)	National Grid Electricity Distribution
Network Parties	Jamie Lowe (JL)	Northern Power Grid

Other Participants		
DCC		
Brad Baker (BB)	Graeme Milligan (GM)	
Robbie McMillan (RM)	Tim Troy (TT)	
DESNZ		
Rachel Allen (RA)		
SECAS		
Simon Grimwood (SG) <i>Working Group Chair</i>	Marc Rhodes (MRh) <i>Lead Analyst</i>	Abi Obadan (AO) <i>Meeting Secretary</i>
Ali Beard (AB)	Georgie Severin (GSe)	
Ofgem		
Ian Chalfon (IC)		
SECCO		

Other Participants
Ashton Briggs (ABr)
Other Working Group Attendees

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified, and a view of the proposed solution.

Background

- As Other Users started to work with energy suppliers to operationalise the application of [MP219 'Accessing Consumption Data on behalf of SEC Parties'](#), the natural applicability of the same concept to the Join/Unjoin services (SEC section I1.3 'Service Requests') has become clear.

Potential Solution

- The clarification required with this issue would aim for extension of similar concept to Section I1.3 'Service Requests', and required formal amendment of this section.

Working Group Discussion

An Issues Group member (EJ) raised a concern that the concept of MP219 could just be applied to SEC section I 1.3 when a lot of time and consideration had gone into the wording for MP219. SECAS (MRh) confirmed that although there had been suggestion that a modification may not be required, the complete approach would be for a modification supported by appropriate legal text changes. (EJ) noted the rationale and advised they did not oppose proceeding through a modification.

Application of MP219 concept

An Issues Group member (JB) queried how you would know if a User joining a Consumer Access Device (CAD) had been given Unambiguous Consent. An Issues Group Member (DD) clarified that if the concept of MP219 was applied to section I 1.3 the third paragraph (b), which relates to the requirement for a User to have received Unambiguous consent from the Consumer at the premises to send either a 'Join Service' or 'Unjoin Service' Service Request would state that if the Supplier already has consent, the Other User does not need to also have it. Adding that the application of the concept of MP219 means that the Other User can use the Suppliers consent.

User scenarios

An Issues Group member (MR) questioned how the concept would be applied as Consumer Access Devices (CAD) can be ordered by Consumers and joined by a third party. MR also shared their concern that this modification could enable someone to arrive outside a Consumer property and join a Device and access their consumption Data. The Working Group Chair (SG) acknowledged the concern and said that this was something that will be included as part of the investigation to develop the Modification. (BT) clarified that they would still need to be an Other User and they could still join CADs but wouldn't need to obtain consent. (SG) confirmed that essentially the Suppliers consent is transferred. (BT) added that there were some controls in place as Users would have to evidence the consents that they hold on behalf of Suppliers as part of the security assessment that they have to undertake annually. (SA) noted that the Supplier has consent as the Consumers are on supply with them but the Other User has to demonstrate that they have an agreement with the Supplier for the consent to apply. Further adding that there has to be a mechanism for the Supplier to inform the Other User if the consent is withdrawn.

Issues Group member (SA) suggested that this modification should be looked at by the Security Sub-Committee (SSC) and Privacy Sub-Committee (PSC).

Change of Supplier

Issues Group member (MB) queried what happens in the event of a Change of Supplier (CoS) who would notify the Other User they no longer have consent. (SA) noted the Supplier should let the Other User know that consent has been withdrawn. Further clarifying that in the event of a CoS the consent would end with the change of Supplier but in the event of a Change of Tenancy (CoT) the consent would remain. (JB) queried if there would be a mechanism or an obligation for Other Users to cancel Data they were receiving in the event of a CoS event. (SA) noted that the Other User should not be actively accessing the Data without evidence that it has the consent to do so. (SA) advised that the Other User should have a process and an agreement with the Supplier for notification of when consent is no longer held so that they will no longer collect Data. Adding that this is covered off in the privacy security assessments Users go through on an annual basis where they have to demonstrate that they've got a process in place.

Examples

An Issues Group member (MR) stated that they still don't understand the scenarios where this would apply and would benefit from some specific scenarios being provided. (SG) replied that the issue is in it's infancy as it has only just been received and these points will be investigated and included in the modification report. (JB) observed that there may also be issues with the Consumers right to refuse consent and the proposed solutions that [MP169](#) is investigating. (DD) added that the presence of physical Devices adds additional complexity as opposed to simply applying the MP219 concept. (SG) acknowledged this and also noted that there may be a need to reconsider the title of this issue.

Next Steps

The following actions were recorded from the meeting:

- This issue will be placed on a wait list for a minimum period of one month
- Raise at Change Sub-Committee

- Present to Sub-Committees