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SEC Change Board Meeting 22_1909

19th September 2018 10:00 – 11:00

8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	Change Board Members
Change Board Chair	David Kemp
Large Suppliers	Jonathan Hawkins
	Paul Saker (<i>Teleconference</i>)
	Stacey Brentnall
	Rachel Mottram (<i>Teleconference</i>)
	Amie Charalambous (<i>Teleconference</i>)
	Oorlagh Chapman (alternate for Graham Wood) (<i>Teleconference</i>) (part)
	Carl Whitehouse (<i>Teleconference</i>)
Small Suppliers	Carolyn Burns (<i>Teleconference</i>)
Networks	Paul Fitzgerald (<i>Teleconference</i>)
	Shanna Key (<i>Teleconference</i>)
	Jeremy Meara (<i>Teleconference</i>)
Other SEC Parties	Elias Hanna (<i>Teleconference</i>)
	Mike Woodhall (<i>Teleconference</i>)
	Gerdjan Busker (<i>Teleconference</i>)
Representing	Other Participants
DCC	Amanda Rooney
BEIS	Milica Malic
	Christopher Thompson
SECAS	Nikki Olomo
	James Hosen
	Alison Beard

1. SECCB_22_1909_01 – SECMP0009 ‘Centralised Firmware Library’

SECAS provided the Change Board Members with the Final Modification Report and the Modification Report Consultation responses for [SECMP0009 ‘Centralised Firmware Library’](#).

The Change Board discussed the recommendations made by the Security Sub-Committee in its consultation response that access to the proposed repository should be restricted to SEC Parties.

SECAS noted that it had contacted the Working Group over this recommendation, and that the members who had responded had agreed with what the SSC had put forward. It noted that this would need to be clarified in the Modification Report, which could only happen if it was sent back to the Panel for clarification. SECAS recommended the Change Board send the modification back to the Panel so that it could include the further clarification around who would be able to access the Firmware Information Repository.

One Member commented that not all manufacturers are SEC Parties and these manufacturers will not have access to the Firmware Information Repository if the Firmware Information Repository is to become restricted to SEC Parties.

One Member questioned what specific access controls will be discussed. SECAS responded that the spreadsheet would be made visible only to people who signed into the SEC Website as a SEC Party. It confirmed that the Firmware Information Repository would also take the form of a locked spreadsheet which cannot be edited.

One Member asked if access to the Firmware Information Repository was to be restricted, then would the modification now progress as a Path 3 “Self-Governance” Modification as they felt it would no longer meet the Path 2 “Authority Determination” solution criteria. SECAS clarified that this will remain a Path 2 “Authority Determination” Modification as the recommendations put forward from the Security Sub-Committee do not affect the solution.

One Member commented that they believe a Firmware Information Repository is a good first step but sought a more ambitious modification for the future to provide a better solution. Another Member added that there has been demand for a more ambitious solution from Suppliers for some time, but it is clear that the proposed modification is as ambitious as it can currently be.

One Member noted that some Parties have made it clear that the costs of implementing and maintaining a spreadsheet for the Firmware Information Repository could outweigh the benefits. Another Member responded that all Supplier Parties agree that a Firmware Information Repository is not the most effective solution at the moment, but that the SEC cannot put obligations on manufacturers as they are not all SEC Parties. Another Member agreed that this is not the best solution and a more robust solution should be pursued, however this solution is better than no solution. It was felt that if this repository was shown to not provide what Suppliers sought then that would provide further evidence that a more robust solution needed to be developed. It was also noted that it is unlikely anything more ambitious could be implemented under the SEC, as this was a wider issue.

Change Board Vote on SECMP0009:

The Change Board unanimously voted to return the Final Modification Report to the SEC Panel with a recommendation that further clarification around who would be able to access the Firmware Information Repository is required within the report before a decision can be made.

The voting outcome is shown below:

Party Category	Proceed to Vote	Return to Panel	Abstain	Conclusion
Large Suppliers	0	6	0	Return to Panel
Small Suppliers	0	1	0	Return to Panel
Networks	0	3	0	Return to Panel
Other	0	3	0	Return to Panel

SECAS noted that the clarified Modification Report may come back to the Change Board to vote at the November 2018 meeting.

The Change Board:

- **CONSIDERED** the Final Modification Report and Modification Report Consultation responses; and
- **AGREED** that the SECMP0009 Final Modification Report should be returned to the SEC Panel with a recommendation that further clarification around who would be able to access the Firmware Information Repository is required within the report before a decision can be made.

2. SECCB_22_1909_02 – SECMP0041 ‘Amending the Change Board decision making rules for Modification Proposals’

SECAS provided the Change Board Members with the Final Modification Report and the Modification Report Consultation responses for [SECMP0041 ‘Amending the Change Board decision making rules for Modification Proposals’](#). SECAS informed the Change Board that the SEC Panel had agreed that due process had been followed and that the Working Group had believed that SECMP0041 should be rejected.

Change Board Vote on SECMP0041:

The Change Board voted to recommend to the Authority to **REJECT** SECMP0041. The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	0	7	0	Reject
Small Suppliers	0	1	0	Reject
Networks	0	3	0	Reject
Other	1	2	0	Reject

The majority view of the Change Board is that SECMP0041 does not better facilitate SEC Objective (g)¹. Multiple Change Board Members were in agreement that SECMP0041 would have a negative impact on efficiency and transparency. It would make the process longer overall, add in additional complexity, and likely require additional resource from Parties and SECAS. Members also felt that many modifications would still end up with the Change Board to vote upon anyway.

Some Members commented that they do not recognise the problem that this solution is supposed to resolve. They did not believe there was anything to suggest the current process was not efficient or transparent.

One Large Supplier Member commented that as well as negatively impacting SEC Objective (g), this modification would also negatively impact SEC Objectives (a)² and (d)³. They explained that SEC Objective (a) would be impacted as modifications can have a direct impact on the functionality of Smart Metering Systems; Objective (d) would be impacted as a single SEC Party could potentially monopolise a vote on a modification.

One Large Supplier Member highlighted that the number of consultation periods would increase, increasing the burden on Parties' time and potentially reducing engagement in the process.

One Large Supplier Member believed that the modification would go against the Code Administrator Code of Practice.

One Other SEC Party Member commented that they felt the Change Board has been effective in operating in a rigorous and impartial manner. They felt this was a core element that should be preserved.

One Other SEC Party Member voted to approve SECMP0041 on the grounds that it better facilitates SEC Objective (g), commenting that the current Modifications process is not fair and that the Change Board does not sufficiently represent all Parties. While Large Suppliers each get a seat, the other categories, in particular Small Suppliers and Other SEC Parties, have representatives on the Change Board who could vote differently to how Parties in their constituency felt. They felt that there had been some modifications rejected by the Change Board that Parties had wanted approved.

The Change Board:

- **CONSIDERED** the Final Modification Report and Modification Report Consultation responses;
- **AGREED** that the SECMP0041 Final Modification Report should not be returned to the SEC Panel;
- **VOTED** to recommend to the Authority that SECMP0041 should be **REJECTED**; and
- **PROVIDED** rationale as to why the Modification Proposal should be rejected.

3. SECP_59_1008_09 – Change Status Report

The Change Board noted this month's Change Status Report. There were no questions or comments raised.

¹ Facilitate the efficient and transparent administration and implementation of the SEC.

² Facilitate the efficient provision, installation, operation and interoperability, of Smart Metering Systems

³ Facilitate effective competition between persons engaged in the Supply of Energy

4. Any other business

Following the Change Board's discussion on [SECMP0049 'Section D Review: Amendments to the Modification Process'](#) at the August 2018 meeting, SECAS highlighted that at the SEC Panel meeting on the 14th September 2018, the SEC Panel was leaning towards creating a separate body for the SEC Change Sub-Committee, rather than allocating the role to the Change Board, should this change be approved. SECAS noted that the Panel has requested to see draft terms of reference and is expected to make a determination once it has seen these at its October 2018 meeting.