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MP149 'Effecting Changes to the Smart Energy Code efficiently'

August 2021 Working Group – meeting summary

Attendees

Attendee	Organisation
Ali Beard	SECAS
Bradley Baker	SECAS
Kev Duddy	SECAS
Khaleda Hussain	SECAS
Joey Manners	SECAS
David Kemp	SECAS
Anik Abdullah	SECAS
Chris De Asha	DCC
Remi Oluwabamise	DCC
David Walsh	DCC
Sarah-Jane Russell	British Gas
Julie Geary	E.ON
Daniel Davies	ESG Global
Ralph Baxter	Octoenergy
Grace Royall	Ofgem
Michael Walls	Ofgem
Emslie Law	OVO Energy
Mafs Rahman	Scottish Power
Elias Hanna	Smart ADSL
Matthew Alexander	SSEN
Kelly Kinsman	WPD

Overview

The Smart Energy Code Administrator and Secretariat (SECAS) provided an overview of the issue identified in [MP149 'Effecting Changes to the Smart Energy Code efficiently'](#), the Proposed Solution and outstanding questions that needed resolving before proceeding to the Report Phase.

Issue

- SECAS now owns the Issue Resolution Proposal (IRP) process to fix known issues within the Technical Specification documents. Agreed changes addressing issues identified within these documents are no longer carried out by the Department of Business, Energy and Industrial Strategy (BEIS) through designations, and now rely on the SEC modification process. All modifications must be assigned a Proposer.
- SECAS cannot raise proposals to fix this, it relies on a Proposer to step forward from a Smart Energy Code (SEC) Party.
- Identifying and working with a volunteer Proposer causes delays and SECAS wants to remove the burden from SEC Parties.
- Is it appropriate for an individual to be named as the Proposer on another person's or group's modification?

Proposed Solution

- Allow SECAS to be named as Proposer.
- Remove restrictions from the SEC Panel to raise modifications.
- Allow the SEC Panel to grant these powers to the relevant Sub-Committees for modifications within that Sub-Committee's remit, as previously suggested by the Working Group.

Working Group Discussion

Rationale

SECAS provided a summary of the Refinement Consultation responses and previous discussions at the Working Group. SECAS had been asked to provide more evidence and rationale behind extending this new provision to each Sub-Committee. SECAS presented the rationale and supporting evidence for each of the SEC Panel, the Alternative Home Area Network (Alt HAN) Forum, the Technical Architecture and Business Architecture (TABASC) and the Operations Group. The rationale noted the scenarios within each group's terms of reference where raising a modification would be efficient and beneficial to the SEC, as well as how often it had occurred in the past.

The Working Group members agreed that sufficient rationale had been provided against each group in the Modification Report and that the provision to raise modifications should be extended to those groups.

Legal text question

SECAS noted that previous Working Group discussions had indicated that there was some concern over the approach to the legal text. This had been drafted to futureproof the requirement to allow the SEC Panel to delegate the provision to raise modifications to any new Sub-Committee in the future. SECAS highlighted that if another Sub-Committee was created, having to consult industry on their ability to raise modifications would slow down any potential changes that could be raised for the benefit of consumers or SEC Parties.

SECAS stated that the legal text would need to be amended following the Refinement Consultation responses. Parties had highlighted that in the current legal text drafting, the Change Sub-Committee (CSC) and Change Board had not been specifically excluded. SECAS advised this would be added to the final legal text.

The Working Group agreed that they were comfortable with this approach, subject to the changes detailed above.

Ofgem raised the question whether there were adequate checks and balances in place to efficiently progress only positive change. SECAS advised that Draft Proposals are raised at the outset which are vetted by the CSC for approval to conduct more work on the issue. CSC also provide approval for the prioritisation and timelines of all ongoing modifications. This had previously been deemed an appropriate control by the Working Group for modifications that would be raised as a result of this modification.

Benefits, Objectives and Approach

SECAS presented the proposed benefits, objectives and implementation approach for the modification. SECAS noted that the proposed benefit of reducing the timescales of modifications from this change outweighs the risk of workload increasing from an increased number of proposals. A Working Group member contributed their experience to the discussion with regards the considerable resource that is required to volunteer as a Proposer. They highlighted that often the modification is not of sufficient interest to their organisation and therefore the modification is not given priority amongst a competing workload. This contributes to the delays which could be avoided if MP149 is approved.

SECAS advised that the Proposer believes the modification better facilitated SEC Objective (g), and two Refinement Consultation respondents highlighted SEC Objectives (a) and (b). The respondents felt that this was a result of allowing the modification process to be open to more groups with a pure focus on smart metering to raise SEC changes.

SECAS stated that the intention would be to reach a decision on the modification in time to be included within the November 2021 SEC Release, but if that was not possible then the February 2022 SEC Release would be the next available release.

The Working Group provided no further comments on these points.

Next Steps

The following actions were recorded from the meeting:

- SECAS to amend the legal text accordingly
- SECAS to prepare MP149 for the Modification Report Consultation