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### Data Best Practice as a Code Obligation

Dear Charley,

Thank you for the opportunity to consider Ofgem's consultation on incorporating Data Best Practice (DBP) obligations into industry Codes and associated licences. This is the response from the SEC Panel.

We support Ofgem's intent to expand and embed DBP principles across the energy system. A more transparent, consistent and interoperable data landscape is essential to delivering an efficient, digitalised, consumer-centric energy system. However, there are specific points of clarification and coordination that we believe are crucial to successful implementation of Ofgem's proposals, particularly for the Smart Energy Code.

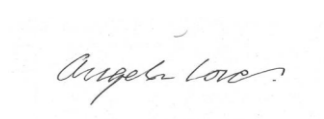
Our key concerns relate to:

- **Clarity:** It is unclear whether the proposed obligations are formalising existing expectations or the introduction of materially new requirements.
- **Coordination:** There is a risk of fragmentation if consequential changes are left to individual Codes without strategic oversight/co-ordination.
- **Feasibility:** The proposed six-month window for consequential Code modifications is potentially unachievable without certainty of scope and effort required.
- **Overlap:** There are multiple live workstreams across the smart metering and data ecosystem that must be joined up to avoid inefficiency and rework.

We set out our detailed responses to relevant questions in the sections below and would welcome the opportunity to engage further with Ofgem to clarify expectations and support a well-sequenced implementation. Please note that we have restricted our answers to those relevant to the SEC.

Should you have any queries on our response, or wish to discuss any aspect in more detail, please contact Oli Meggitt, Senior Strategy Manager ([oli.meggitt@seccoltd.com](mailto:oli.meggitt@seccoltd.com)) or [consultations@seccoltd.com](mailto:consultations@seccoltd.com).

Yours Sincerely,



Angela Love  
SEC Panel Chair

**Q1. Do you agree with our intent to expand DBP Guidance into the codes?**

The SEC Panel supports the intent to embed DBP Guidance within industry codes. We believe that doing so will promote consistency and transparency across the energy sector's digital infrastructure, supporting interoperability and alignment with net zero and system flexibility goals.

However, we would welcome greater clarity from Ofgem on the intended impact of this change. Specifically, we would like to understand whether the expectation is that Code Bodies simply align with existing practices, or whether Ofgem expect to introduce material new obligations or governance processes. This clarity is critical for us to determine the scale, cost, and time needed to implement changes under the SEC.

We also note the importance of maintaining alignment with other data-related obligations and principles, such as those that will sit within the future Code Manager Licences under Energy Code Reform. A fragmented or inconsistent approach to data obligations would undermine the benefits of DBP and risk duplication of effort.

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**Q2. Do you agree with the proposed deadline six months after the licence condition is applied for consequential code modifications? If not, please state your reasons specific to the relevant code and modification process.**

We believe the proposed six-month deadline may be challenging to meet for the SEC, particularly if the changes required are substantial. Our ability to meet this timeline is highly dependent on the clarification sought in response to Q1 — i.e. whether we are formally implementing current practice, reflecting existing practice from elsewhere, or introducing entirely new requirements.

The SEC modification process is robust and inclusive, but it involves defined governance steps, impact assessments, Panel approvals and stakeholder consultations. Without a clear and early understanding of scope, the SEC Panel may be unable to deliver high-quality legal drafting and secure stakeholder support within the six-month window.

We are also concerned about the risk of fragmentation and inconsistency if each Code is required to independently interpret and implement the licence changes. Whilst we recognise the importance of tailoring the obligations to each Code's context, we believe there is a strong case for centralised coordination. Specifically, we propose that Ofgem consider:

- Leading and co-ordinating the drafting of a common set of modification principles or template legal text, to be adapted by each Code as appropriate; or
- Appointing one Code Body or Panel to act as the lead, working in collaboration with others to develop a consistent and efficient approach.

Without such coordination, there is a risk of misalignment, unnecessary duplication of effort, and delays caused by divergent interpretations. A centrally supported approach would not only reduce this burden, but also accelerate delivery and improve the quality and consistency of the resulting modifications. This would also aid Code parties in understanding the arrangements across the Codes.

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**Q3. Do you agree with the minded-to position that an obligation to produce DSAPs is suitable and proportionate for code bodies? If not, what alternative would you propose to achieve the same or greater benefits?**

We recognise the value of Digitalisation Strategies and Action Plans (DSAPs) in promoting transparency and user-led prioritisation of data initiatives. Several areas of the SEC ecosystem already operate in alignment with DBP principles, and we understand the intention to expand this good practice.

However, the SEC is structurally different from some other codes. SECCo and SECAS do not hold or access personal or operational energy data directly. All data flows through the DCC's infrastructure and is encrypted.

That said, the SEC does have an assurance and governance role in relation to DCC data and how it is accessed and used by DCC Users. There may be a case for DSAPs produced under the SEC to focus on these indirect responsibilities — for example, how the SEC framework supports DBP compliance, user obligations, and continuous improvement in smart metering data practices.

We therefore support the obligation in principle but suggest it should be applied proportionately and reflect the specific governance role the SEC plays, rather than assuming the same responsibilities as a data-handling body. A more tailored, risk-based approach to DSAP expectations could be helpful in ensuring the obligations are meaningful and value-adding.

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***Q9. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence amending the SEC?***

We understand and support the rationale for including the SEC within this programme, given its critical role in governing smart metering data flows and system rules.

While SECCo, SECAS and the SEC Panel do not access or process personal data, we recognise that the SEC does play a role in assuring that parties who do access such data — notably the DCC and DCC Users — comply with their obligations under the Data Protection Act and DBP principles. This is reflected in areas such as User Entry Processes, audit requirements, and ongoing performance assurance.

We therefore suggest that the changes required to the SEC to embed DBP should be clearly scoped and proportionate, recognising that the Code's role is largely to enable, govern, and assure data practices, rather than to carry them out directly.

We therefore suggest that the changes required to the SEC to embed DBP should be clearly scoped and proportionate. The obligations should support the principles of good data governance, but not inadvertently impose burdens that are misaligned with the Code's actual function.

We also request that Ofgem coordinates any consequential SEC modifications with other ongoing smart metering initiatives — including the Smart Meter Data Repository and Customer Consent Solution — to ensure strategic alignment and avoid repeated or fragmented change.

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***Q11. Do you think this proposed principle merits discussion at the CACoP forum for inclusion in CACoP v7.0?***

Yes. We believe it is appropriate to consider a new principle within CACoP that reflects the importance of data best practice, transparency and interoperability in the development and administration of industry codes.

However, we would not support duplicating DBP obligations in multiple places. If DBP is to be embedded in licences and codes, the CACoP principle should act as a guiding statement, reinforcing alignment, rather than creating an additional or separate obligation.

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***Q12. Do you have any concerns, or can you see any risks or issues, with the proposed change to the Smart Meter Communication Licence?***

Our main concern relates to the risk of conflicting or overlapping expectations arising from:

- The new DBP obligations;

- Existing data-related requirements within the Smart Meter Communication Licence;
- The emerging obligations under Energy Code Reform (e.g. the forthcoming Code Manager Licence); and
- Live workstreams such as the Customer Consent Solution and both Smart Meter Data Repository programmes.

To manage this, we would strongly urge Ofgem to:

- Clarify the scope of new DBP requirements relative to what is already in place;
- Provide early guidance or templates for how licence-holders should approach consequential code changes; and
- Ensure that this work is integrated with other reforms and digitalisation initiatives, so that effort is not duplicated and delivery is not delayed.