

Angela Love – SEC Panel Chair
Smart Energy Code Company Limited
77 Gracechurch Street
London, EC3V 0AS

Kirstan McCartney,
By email: DCCregulation@ofgem.gov.uk

04 November 2025

Draft new Smart Meter Communication Licence

Dear Kirstan,

The Smart Energy Code (SEC) Panel welcomes the opportunity to respond to the consultation on the draft new Smart Meter Communication Licence (SMCL) for the Successor Licensee. Please accept this letter as our formal response.

While we have not provided answers to every individual consultation question, we have reviewed the draft Licence in detail and offer feedback on the areas most relevant to the Smart Energy Code (SEC) and its governance.

In doing so, we have considered the consultation questions and focussed our feedback on the key themes most relevant to the SEC and its governance.

Structure and readability of the draft Licence

We support the restructuring of the original Licence and welcome the new chapter-based format. This makes the document easier to read and navigate, helping stakeholders to locate and interpret the relevant sections more quickly.

We believe this drafting style will foster more effective engagement and be especially useful for potential applicants for the second Licence of the DCC and those less familiar with the existing Licence – such as new market entrants and future users of the DCC network.

SEC alignment and Licence Condition updates

Our review of the draft SMCL has not identified any immediate concerns or omissions. We support the proposed changes to Licence Condition 11, particularly the recognition that the SEC is now an established and enduring Code.

We agree with the introduction of a duty on the Licensee to have regard to the SEC Objectives. This will help ensure the Licensee's activities remain aligned with the SEC.

We also support the proposal to move the mandatory content and code arrangements to Schedule 2, as this provides a clearer delineation between the Licence and the SEC itself.

In principle, we agree with the proposed removal of the Licensee's right to be supplied with information on other core industry documents. We recognise that this obligation is currently unenforceable in practice and that responsibilities for such information should rest with the appropriate parties, licences, or industry codes. However, we note that the current proposal lacks sufficient detail, and we seek clarification on how these duties will be reassigned to those appropriate parties, licences or codes and operate in practice. We wish to understand the

relevant timescales for these activities.

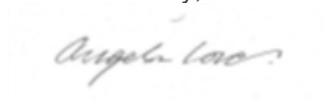
Future SEC Modification and implementation considerations

The SEC Panel and SECCo are committed to working collaboratively with Ofgem and other relevant stakeholders to identify and progress all necessary Modifications to the SEC resulting from the new SMCL. We recognise that these changes will need to be carefully coordinated to ensure alignment between the new Licence and the SEC, and to support a smooth transition to the Successor Licensee. We have separately offered to work with Ofgem to identify where changes to the SEC will be required and will continue to support these (and related) activities.

We look forward to continuing our engagement with Ofgem on this important work and stand ready to support the successful implementation of the new SMCL.

Should you have any queries or wish to discuss our response further, please contact Oli Meggitt, Senior Strategy Manager (oli.meggitt@seccoltd.com), or email consultations@seccoltd.com.

Yours Sincerely,



Angela Love
SEC Panel Chair