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DP214

‘Clarification of Acceptable DCC User IDs for Import and Export Suppliers’

Modification Report

Version 0.1

9 August 2022



About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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1. Summary

This proposal has been raised by Roxy Ali from the Data Communications Company (DCC).

As per the drafting of Smart Energy Code (SEC) Section H 'DCC Services' clause H1.5, SEC Parties are excluded from using the same DCC User identification (ID) for the User Roles 'Import Supplier' and 'Export Supplier' unless they are also a 'Gas Supplier'. This modification seeks to clarify what exceptions to the rule of using one ID number per User Role should be allowed within the SEC.

2. Issue

What are the current arrangements?

When a SEC Party wishes to become a DCC User it is required to use a unique ID number, applied by the SEC Panel, for each User Role it wishes to act in. Exceptions to the rule of using one ID number for each User Role are allowed within the SEC.

What is the issue?

SEC Section H 'DCC Services' states that when a Party wishes to register as a DCC User in the User Roles 'Import Supplier', 'Export Supplier' and 'Gas Supplier', it can use the same ID number for each Role.

SEC Section H1.5

"A Party wishing to act as a User in one or more User Roles shall propose to the DCC one or more identification numbers, issued to it by the Panel, to be used by that Party when acting in each such User Role. Each such identification number must be EUI- 64 Compliant, and the same identification number cannot be used for more than one User Role, save that a Party may use the same identification number when acting in the combined User Roles of either, 'Import Supplier' and 'Gas Supplier' or 'Import Supplier', 'Export Supplier' and 'Gas Supplier'."

This wording excludes a Party from using the same ID number for the User Roles 'Import Supplier' and 'Export Supplier' unless it also intends to act in the User Role 'Gas Supplier'.

What is the impact this is having?

The Proposer believes that the SEC is unnecessarily exclusionary on this point. Not allowing the use of the same User ID for Import Supplier and Export Supplier means the Party must request multiple ID numbers from the SEC Panel, and the DCC must engage in further checks and monitoring to ensure these are assigned correctly. Managing multiple ID numbers for the same Party has a minor impact on DCC time and effort.

Impact on consumers

This issue does not currently have any impact on consumers.

3. Assessment of the proposal

Areas for assessment

The Smart Energy Code Administrator and Secretariat (SECAS) does not currently expect this change to have any material impact, but this will be validated as the modification is assessed and developed.

Upon initial review, SECAS suggested that the drafting could have been originally intended to stop a Dual Fuel & Export Supplier needing three IDs, but in calling this out failed to specify that it is acceptable for an Import and Export Supplier that isn't also a Gas Supplier to use the same ID for both User Roles.

SECAS will investigate whether it would be a valid option to allow Parties to use the same User ID for other combinations of User Roles.

Sub-Committee input

SECAS will engage with the Chairs from the Operations Group (OPSG), the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Would this modification have any operational impact?
SMKI PMA	Are DCC User IDs relevant to SEC Parties' SMKI requirements?
SSC	Would allowing a Party to use the same DCC User ID for Import and Export Supplier introduce a security risk?
TABASC	Would allowing a Party to use the same DCC User ID for Import and Export Supplier impact any technical processes?

Appendix 1: Progression timetable

This modification will be presented to the Change Sub-Committee (CSC) on 16 August 2022 for initial comment. Following this, it will be presented to the relevant Sub-Committees for input on the issue and how the modification should proceed.

Timetable	
Event/Action	Date
Draft Proposal raised	9 Aug 2022
Presented to CSC for initial comment	16 Aug 2022
<i>Draft Proposal discussed with Sub-Committee Chairs</i>	<i>17 Aug 2022</i>
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>20 Sep 2022</i>

Italics denote planned events that could be subject to change

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Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
CSC	Change Sub-Committee
DCC	Data Communications Company
ID	Identification
OPSG	Operations Group
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee