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DP233

‘Review of Appendix AG Incident categorisation’

Modification Report

Version 0.2

14 March 2023

Corporate member of
Plain English Campaign
Committed to clearer
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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 Joe Hehir from the Data Communications Company (DCC).

Smart Energy Code (SEC) Appendix AG details the Incident Management Policy, which is a requirement of SEC Section H 'DCC Services'. The Incident Management Policy details the full Incident Management lifecycle including management and declaration of Major Incidents, Problems and escalations.

Due to the evolution of the DCC landscape and the requirements of the DCC's Service Users, the current Categorisation Matrix in SEC Appendix AG (Clause 2.4.4) has lost a considerable level of relevance. It also contains some ambiguous or out of date descriptions. As a result, the DCC's current approach to Incident Prioritisation (also known as Classification) cannot align clearly with Service Users' expectations. This leads to misaligned understanding of incident impact, failed Service User expectation, and reduced levels of customer service experienced by the Service Users.

An initial review of the SEC Appendix AG Priority Matrix identified the areas of concern which need to be addressed via the modifications process.

2. Issue

What are the current arrangements?

Incident Management is a process to identify, analyse, and resolve incidents which if not resolved can lead to further issues arising. This is to ensure restoration of normal DCC service operations while minimising impacts to Parties and maintaining quality. The Incident Management Policy details how the DCC identifies and manages Incidents, so that all DCC Users are provided the same level of service and the DCC is able to prioritise workload. This would in turn give Users confidence that their Incident is dealt with appropriately. All incidents are categorised by severity from Category 1 (highest severity) to Category 5 (lowest severity).

SEC Appendix AG details the Incident Management Policy which is a requirement of SEC Section H 'DCC Services'. The Incident Management Policy details the full Incident Management lifecycle including management and declaration of Major Incidents, Problems and escalations. It also includes Error Handling Strategy and Business Continuity and Disaster Recovery.

What is the issue?

SEC Appendix AG relates to the DCC's approach to Incident Management. While the whole document needs a review, the initial area of concern for DCC Service Users is the Categorisation Matrix, covered in Clause 2.4.4. As it is currently written, the descriptions are not clearly defined, which has caused confusion and differing interpretations.

Additionally, the Categorisation Matrix, has lost a considerable level of relevance, due in large part to the evolution of the DCC landscape and the requirements of the DCC's Service Users. As a result, the DCC's current approach to Incident Prioritisation (also known as Classification) cannot align clearly with Service Users' expectations, as the current Incident Management descriptions and Prioritisation Matrix within SEC Appendix AG are out of date and ambiguous. This leads to misaligned

understanding of incident impact, failed Service User expectation, and reduced levels of customer service experienced by the Service Users.

An initial review of the SEC Appendix AG Priority Matrix has identified the terms and phrases which are of concern.

Identified issues		
Concern	Terms in the SEC	Reason for review
Impact Level is not defined	Critical Adverse Impact Non Critical Adverse Impact Adverse Impact Moderate Adverse Impact Minor Adverse Impact Minimal Impact	Table in Clause 2.4.4 states the six levels of impact but these are not defined anywhere. It is not possible for the DCC to correctly assess this for a Party.
Financial Loss scale is not defined	Significant Financial loss More than trivial, but less severe than significant	Table in Clause 2.4.4 states these two levels of financial impact. Again, it is not possible for the DCC to assess these terms, however it is noted that there are only two thresholds provided here.
Presence of a workaround affecting the incident categorisation	Availability of a workaround	In the event of a Workaround the incident may well be Resolved, with the DCC's Problem Management picking up an enduring fix and Root Cause Analysis (RCA) activity. Under the current SEC wording the only impact would be to downgrade the Category, depending on resulting impact after the Workaround.
Number of Parties affected	Large Group of Incident Parties	'Large Group' should be quantified. 'Incident Parties' implies that more than one Service User is impacted, but is not quantified or agreed as "multiple". Lower categories of incident list singular 'Incident Party'
Onus on DCC	Reasonable opinion of DCC	It is not possible for the DCC to know, or even make a reasonable estimation, how an incident could impact a particular Party's business process or finances.

What is the impact this is having?

Service Users have already questioned the DCC's impact analysis and raised concerns over the approach being fully aligned to the SEC and whether the current SEC requirements are even fit for purpose. An agreement was made with the Service Users and the Operations Group (OPSG) to review the current approach to impact analysis and create a more pertinent, SEC-aligned approach.

Failing to carry out this review will result in further discourse from the Service User community. In addition, ambiguity will remain in SEC Appendix AG which is impacting the DCC's and Service User's ability to manage Incidents.

Impact on consumers

If the DCC has greater clarity on incident definitions, it will be able to better manage them, which can reduce the likelihood of incidents. The consumer would therefore benefit from a more reliable and stable DCC system and a more efficient incident resolution process.

3. Assessment of the proposal

Areas for assessment

Sub-Committee input

SECAS has engaged with the Chairs from the 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	Advise on any operational impact and help develop the Proposed Solution.
SMKI PMA	None – no impacts
SSC	None – no impacts
TABASC	None – no impacts

Observations on the issue

SEC Sub-Committee Chair input

The OPSG Chair commented that this is an active topic being discussed by the OPSG; however, there are no open actions for this. They considered that it might be premature to raise the modification at this time, as more discussions need to be had with OPSG members via workshops. However, they acknowledged this modification would need to be raised eventually. The OPSG Chair confirmed that the OPSG would need to be consulted and help develop this proposal's solution. SECAS noted that the Proposer would like to have OPSG input during the modification.

Change Sub-Committee

A Change Sub-Committee (CSC) member believed that the DCC has a 'simplification matrix', which they considered was causing this issue. The member supported coming to a shared view on the categorisation of incidents to help speed up their resolution.

Appendix 1: Progression timetable

SECAS will present this modification to the CSC on 21 March 2023 with the recommendation this is converted to a Modification Proposal and progressed to the Refinement Process.

Timetable	
Event/Action	Date
Draft Proposal raised	14 Feb 2023
Presented to CSC for initial comment	21 Feb 2023
Relevant Sub-Committees consulted on the issue	Late Feb 2023
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>21 Mar 2023</i>
<i>OPSG development</i>	<i>Mar 2023 – Apr 2023</i>
<i>Modification discussed with Working Group</i>	<i>3 May 2023</i>
<i>Refinement Consultation</i>	<i>10 May 2023 – 31 May 2023</i>
<i>Modification discussed with Working Group</i>	<i>7 Jun 2023</i>
<i>Modification Report approved by CSC</i>	<i>20 June 2023</i>
<i>Modification Report Consultation</i>	<i>21 Jun 2023 – 12 Jul 2023</i>
<i>Change Board Vote</i>	<i>26 Jul 2023</i>

Italics denote planned events that could be subject to change.

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
OPSG	Operations Group
RCA	Root Cause Analysis
SEC	Smart Energy Code
SECAS	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