

Appendix B - Additional Comments

Topic	SECAS	Templates	Decision making	Cross Code
Recommendation	Talk to the service providers directly – people actually building it could give a better estimate without getting into the commercials. T shirt sizing. Particularly for DNOs / LDSOs. There are fewer in the industry so not as onerous as it once was.	SECAS and Authority need to understand that parties are unlikely to be able to provide fully costed impact assessments as that requires additional resources, which are only allocated once a change is approved and pending implementation. This is not just limited to SEC, it is all codes. However, an order of magnitude or numbers are or could be provided when available.	Security changes should not go straight through on the nod there needs to be proper scrutiny of all changes	Need to understand the IT landscape – flows and billing systems.
	Consider bilateral discussions to gain understanding as individual companies might be happy to share impacts and ideas in one-to-one discussions but not in public forums or via responses.	SEC other party – pay not costs and rarely have a direct impact, more likely to be an indirect impact so clearly flagging would help.	Change Sub Committee could see itself more like an investment committee – needs a thought through costs / benefit analysis. Decisions would not be made by commercial companies.	Need to be clear when flagging impacted parties – does it mean system impact, financial impact, benefit etc. A suggestion was impacted directly or interested.
	Any technical specification changes would require a very long lead in time before carrying out a post implementation review as implementation only facilitates the change it does not mean it is being used immediately. Or it could require several iterations.	Help direct impacts by looking at outcomes, for example reduced number of removed meters (so less stranded assets or early replacement charges), reduced customer	Focus on value for money as providing costs or benefits is difficult. Keep asking the “so what” to get an idea of the costs.	Need to consider the cost of doing nothing as well as the costs of the specific change.



Topic	SECAS	Templates	Decision making	Cross Code
		contacts (could have an industry average cost to serve)		
	Cross over with groups still being led by DESNZ means the change process is not fully run by SECAS and the SEC.	Incumbent on whoever raises a Mod to make sure benefits can be realised – this is getting better.	Maybe look at how long people serve on committees – change of mentality	
	Use MoSCoW analysis – must-have, should-have, could-have, and won't-have, or will not have right now - to help introduce more rigour.	Flag legal text only changes differently to technical or reporting changes as these are more likely to cause concern	Frustrating the way costs are presented and held to the release – could tip the balance of the business case once testing costs are included.	
	Things are definitely getting better – changes to the change process. More having the challenge unofficially than anything set in stone. Having the Issues Group / process has helped filter things out.		If it gets through working group to approval then there usually is agreement there is a benefit	
	Engage with Trade Associations as they can provide ideas of scale rather than individual companies providing commercially sensitive information (particularly for meter manufacturers).		Number of releases impacts parties not just DCC. Recommend these are limited to drive down costs.	
	Would be useful to have a number of metrics to allow SECAS to do assumptions to help draw up costs / benefits.			
Points to note	Regression testing should be a fixed cost does not fluctuate with every chance.		Many changes are due to incorrect decisions made by Government as part of their smart roll out project.	
	Transparent on what is included in a release. Costs were shown at Change Sub Committee last year and now going to Change Board – needs much higher visibility. This could include visibility of the costs DCC provides to		MP169 – lot of industry time spent so far and very high costs but due to misrepresentation by Ombudsman / Ofgem.	



Topic	SECAS	Templates	Decision making	Cross Code
	Ofgem for price control review – could use that to get more detail.		Does not join up with MHHS Programme and Ombudsman expected to change their view so effort wasted.	
	Mod to remove black list / white list from documentation down to the meters – agreement it should be done but price tag £12m and no guarantee it would solve everything. Question on consumer benefit. Can it be done organically with new DSP.		Could there be a separate process for Mods like P243? There is always the same “dance” due to the risk of assets becoming obsolete before they are used so does it need to be part of the BAU process or could it be done somewhere else?	
	Mods have been solving existing drafting issues / unclear text rather than new ideas / improvements.		TIBASC could be involvement more in the challenging of costs. For example, why is it 1FTE every time a report is built – should be challenged more.	

