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MP167 'Review of SEC documents'

Modification Report

Version 0.3

29 June 2021



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 Cordelia Grey from the Data Communications Company (DCC).

The intent of this proposal is to review the Smart Energy Code (SEC) to ensure that any necessary Code rationalisation takes place. At the time the proposal was raised, the Proposer had identified two SEC Sections (T 'Testing During Transition' and X 'Transition') and two SEC Appendices (F 'Minimum Communication Services for SMETS1 Meters' and AN 'SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release') that would benefit from a review. This may result in SEC documents or paragraphs being deemed no longer applicable to the SEC and thus being removed.

Furthermore, at the April 2021 SEC Panel meeting, Ofgem presented its view on Code modernisation. Ofgem believes there is scope for Code rationalisation to take place which will not impact the effect or meaning of industry Codes.

2. Issue

What are the current arrangements?

The Proposer reviewed several documents of the SEC, and has identified areas that may no longer be applicable. There may be further areas of the Code that are no longer of use, and so the SEC may benefit from rationalisation to ensure it is concise and therefore easier to understand.

The SEC Sections and Appendices identified by the Proposer are set out below.

SEC Section T

SEC Section T7.1 states:

"This Section T shall cease to apply, and this Code shall automatically be modified so as to delete this Section T, on the last to occur of the following:

- (a) completion of Interface Testing;*
- (b) completion of End-to-End Testing; and*
- (c) completion of SMKI and Repository Testing."*

The Proposer believes this Section in its entirety is no longer applicable as each of the above testing regimes has been delivered, as outlined below.

Interface Testing

This was completed on 4 November 2016 for the Communication Service Provider (CSP) for the Central and South Regions, and 17 November 2016 for the CSP North. Documentation of the testing completion for each CSP can be found [here](#).

End-to-End Testing

This was completed on 9 November 2016 for the CSP Central and South, and 25 November 2016 for the CSP North. Documentation of the testing completion for each CSP can be found [here](#).

SMKI and Repository Testing

The final part of the Smart Metering Key Infrastructure (SMKI) and Repository Testing, Part 3b, was approved by the SEC Panel on 15 June 2018. Further information regarding the SEC Panel's approval can be found [here](#).

Further information regarding the SMKI and Repository Testing completion can be found [here](#).

SEC Section X

The Proposer has also identified a clause in SEC Section X 'Transition' (X1.5), whereby several sections cease to apply once the Smart Metering Implementation Programme (SMIP) has been completed, or after 31 October 2018. The entirety of SEC Section X is not subject to removal, as some clauses will need to remain in place as they are of relevance to the Department for Business, Energy & Industrial Strategy (BEIS). Section X1.5 states the following sections are to be deleted following Completion of Implementation or 31 October 2018:

- Section X1.11;
- Section X2 (Effective Provisions at Designation) except from X2.3(d), X2.7 and x2.8;
- Section X3 (Provisions to Become Effective Following Designation) except from from X3.1 and X3.9;
- Section X4 (Governance Set-up Arrangements);
- Section X6 (Transitional Variations);
- Section X7 (Transitional Incident Management Procedures);
- Section X8 (Developing CH Support Materials); and
- Section X10 (Threshold Anomaly Detection Procedures).

SEC Appendix F

The Proposer has commented that SEC Appendix F 'Minimum Communication Services for SMETS1 Meters' has been retired. This is because it has been superseded by the live Smart Metering Equipment Technical Specifications (SMETS) 1 services that are set out in SEC Appendix AD 'DCC User Interface Specification', SEC Appendix AB 'Service Request Processing Document', and the SMETS1 Supporting Requirements. They further stated that Appendix F was an early attempt at listing out the service offering that the DCC should consider as part of the feasibility study and the subsequent Enrolment & Adoption programme. This was initiated through the activation of SEC Section N 'SMETS1 Meters'.

SEC Appendix AN

The SEC Variation Testing Approach Document (SVTAD) for the November 2020 SEC Release set out the framework for the testing of the BEIS-directed changes included in this release. It also set out the requirements that applied to the development of the November 2020 SEC Release Testing Approach Document (TAD), which presented the testing in more detail. The November 2020 SEC Release went live on 29 November 2020.

Ofgem's views on Code rationalisation

During the April 2021 SEC Panel meeting, Ofgem presented an update on its ongoing work on Code governance¹. This included its views on Code rationalisation taking place to remove unnecessary and redundant content from Codes that will not impact the effect or meaning of these Codes. It considered that removing unnecessary and redundant content could help Codes be clearer and more accessible.

What is the issue?

The Proposer has identified several areas that appear to be no longer applicable to the Code. Ofgem have also stated during a SEC Panel meeting, that it may be beneficial for SECAS to review the SEC to identify any areas where the Code may be able to be rationalised. It is the intent of this Draft Proposal to carry out a review the SEC and identify areas that could potentially be removed from the Code.

What is the impact this is having?

Redundant sections being retained within the SEC adds increasing complexity for readers.

Impact on consumers

This issue has no impact on Consumers.

3. Assessment of the proposal

Views of the Sub-Committee Chairs

During the Development Stage, SECAS held a meeting with the Sub-Committee Chairs to discuss initial observations regarding the Draft Proposal. The Chairs commented that any proposed change must be carefully thought through and verified with the SEC Lawyer. Furthermore, they added that SECAS must ensure that any enduring arrangements that need to be kept are allocated to the relevant SEC Section.

The Security Sub-Committee (SSC) and Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) Chair stated that all SMKI documents have undergone a significant

¹ Please see Panel paper SECP_91_1604_21 for more detail.

review and a modification will be raised to make relevant changes. As a result, the SMKI documents are out of scope of this proposal.

SEC Lawyers

During the Development Stage, SECAS engaged with SEC Lawyers for guidance on the issue defined. SEC Lawyers stated that SEC Section T and the forementioned paragraphs within SEC Section X are no longer applicable to the Code and should no longer be published. They also stated that a modification is not needed to facilitate this change. However, consequential changes to documents, such as existing references will need to be captured under a SEC Modification. SECAS will continue to engage with SEC Lawyers throughout the Modification Process.

Change Sub-Committee

On 29 June 2021, SECAS presented the proposal to the Change Sub-Committee (CSC) with the recommendation that the Draft Proposal is converted into a Modification Proposal and proceeds to the Refinement Process. SECAS informed the CSC that they would engage with BEIS and Ofgem to align with the proposed changes before attending the Working Group. The CSC agreed that the issue was clearly defined and were happy for the modification to proceed to the Refinement Process.

Appendix 1: Progression timetable

On 28 June 2021 MP167 was converted into a Modification Proposal and entered the Refinement Process. SECAS will work with the Proposer SEC Lawyers, BEIS and Ofgem to align on the Proposed Solution. Once draft legal text has been produced, SECAS will present the modification with the SEC Working Group.

Timetable	
Event/Action	Date
Draft Proposal raised	7 Jun 2021
Engage with SEC Lawyer to brief it on the proposal	Late Jun 2021
Presented to CSC for decision	29 Jun 2021
Proposed Solution developed with the Proposer	Jul - Aug 2021
Draft legal text developed with the Proposer and SEC Lawyer	Jul - Aug 2021
Modification discussed at Working Group	1 Sep 2021
Modification discussed with TABASC	2 Sep 2021
Modification discussed with OPSG	7 Sep 2021
Modification discussed with SSC	22 Sep 2021
Update provided to CSC	28 Sep 2021

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
BEIS	Department for Business, Energy and Industrial Strategy
DCC	Data Communications Company
OPSG	Operations Group
SEC	Smart Energy Code
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
SECAS	Smart Energy Code Administrator and Secretariat
SVTAD	SEC Variation Testing Approach Document
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAD	Testing Approach Document