

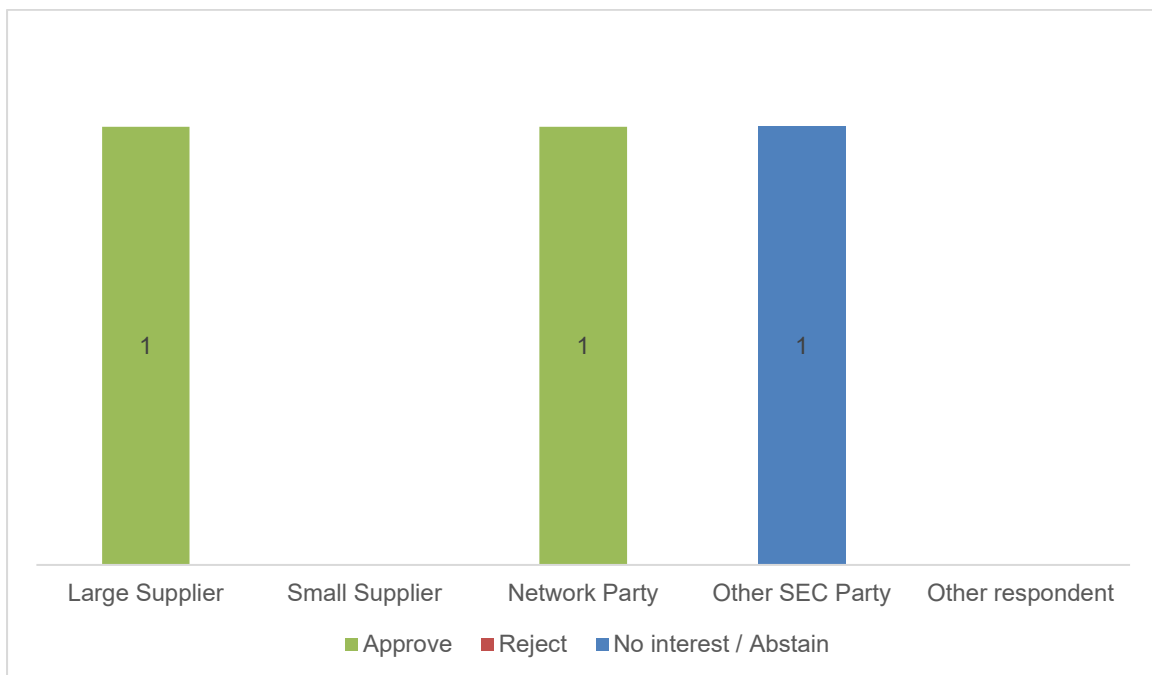
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MP212 ‘Housekeeping changes 2022’ Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP212 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP212 should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Alt HAN Company	Other SEC Party	Abstain	Alt HAN has previously discussed the proposed changes to Section Z (which set out the Alt HAN arrangements). Our response is to confirm that there are no impacts arising from these Housekeeping changes and that the legal drafting is simply removing redundant references or typos. We have not reviewed the wider legal drafting.	-
British Gas	Large Supplier	Approve	We agree that this will better support the delivery of General SEC Objective (a).	-
Western Power Distribution	Network Party	Approve	We note where it states ' <i>Secretary of State directs that an addition or modification is not to have effect, the Secretary of State may subsequently</i> ' in Section X3 a space is required between State and may.	SECAS has included this correction in the Legal Text v1.1.

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
Alt HAN Company	Other SEC Party	N/A	-
British Gas	Large Supplier	<u>Page 27. X2 Effective Provisions at Designation</u> I was concerned by this new text being added, which didn't seem to be just 'Housekeeping': <i>'X2.1 The Secretary of State shall be entitled to direct the Panel to cancel or suspend any Modification Proposal, in which case the Panel shall cancel or suspend the Modification Proposal in question and it shall not then be further progressed or implemented (or, in the case of suspension, shall not then be further progressed or implemented until the Secretary of State so directs).'</i> Is this a new power? It seemed very different to the much longer text it is replacing. <u>Page 35. X4 Governance Set-Up Arrangements</u> The deleted text here seemed to be quite important, regarding governance of the SEC Panel. Can you confirm where this will now be covered in the SEC? Or was it a duplication?	The changes to Section X ceased almost 4 years ago, and due to an automatic deletion clause, it does not need a modification in order to amend them. However, we decided to include them in our Housekeeping modification so that it would be highlighted to industry that these changes are being made. Further details are stated within the MP212 modification report, as follows: SEC documents which cease to apply There are several sections within the SEC which cease to apply. SEC Section X 'Transition' 1.5) sets out several sections that ceased to apply once the Smart Metering Implementation Programme (SMIP) has been completed, or after 31 October 2018 (whichever was earlier). The entirety of SEC Section X is not subject to removal, as some

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Question 2			
Respondent	Category	Comments	SECAS Response
			clauses will remain in place. Section X1.5 states the following sections are to be deleted following the Completion of Implementation or 31 October 2018: <i>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 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).</i> Also in SEC Section X, Sections X1.11, X4, X6, X7, X8 and X10 will be replaced by '[NOT IN USE]', in line with other Sections within the SEC that are no longer applicable.

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Question 2			
Respondent	Category	Comments	SECAS Response
			There will also be revisions to Sections X2.1 and X3.1 and their subsequent paragraphs. The amendment of SEC Section X is captured in the legal text for transparency; however the section contains an automatic deletion clause (X1.5) and therefore a SEC modification is not technically required to amend the section. SECAS has decided to include them into this modification in order to highlight to the industry that these sections have now been updated or removed.
Western Power Distribution	Network Party	Whilst we note it is not part of this modification, we have noticed that MP102B Legal Text Section F4.9B states '<i>In relation to Devices on such list, in the case of a no Power Outage Event (AD1) Alert being received by the DCC</i>' and believe it should read '<i>In relation to Devices on such list, in the case of a Power Outage Event</i>'. We are not sure if this can be added to this modification.	Unfortunately, as the changes outlined in MP102B legal text are not to be implemented until June 2023 SEC Release, we are unable to include it as part of this Modification, however, it will be noted on the SECAS Housekeeping Log and can be included in a future modification that makes changes to Section F.