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MP214

'Clarification of Acceptable DCC User IDs for Import and Export Suppliers'

Modification Report

Version 1.0

19 April 2023

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

Contents

This document also has two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the responses to the Refinement Consultation.

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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 SEC Section H1.5 'DCC Services', SEC Parties are excluded from using the same DCC User Identification (ID) for the User Roles 'Import Supplier' (IS) and 'Export Supplier' (ES) unless they are also a 'Gas Supplier' (GS). This modification seeks to clarify what exceptions to this rule of using one ID number per User Role should be allowed within the SEC.

Suppliers are impacted by this as they must request more than one ID number from the SEC Panel, which has minor but unnecessary impacts. Similarly, the DCC must also engage in checks to ensure the correct ID number has been assigned.

The Proposed Solution to this modification involves a change to the SEC to allow Parties to act in any combination of some or all the User Roles of Import Supplier, Export Supplier and Gas Supplier with the same User ID.

The costs associated with this modification are SECAS implementation costs. This modification will impact the DCC, Suppliers and Network Operators. This is a self-governance modification and is targeted for the June 2023 SEC Release.

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. This is to ensure that all messages sent via the DCC System are attributable to the originating Party and to the context in which they are being sent. Exceptions to the rule of using one ID number for each User Role are allowed within the SEC.

Specifically, SEC Section H1.5 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:

> *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'."*

Active User IDs in the DCC System

To determine whether the current arrangements should be altered, the Smart Energy Code Administrator and Secretariat (SECAS) has engaged with the DCC to confirm which User IDs are actively being used by SEC Parties.

- There are 15 SEC Parties actively using just the Import Supplier (IS) User Role.

- There are 16 SEC Parties actively using just the Gas Supplier (GS) User Role.
    - Six of these SEC Parties are the same organisation, however it has chosen to separate its business between electricity and gas. It therefore has different SEC Party IDs for different parts of its organisation.
- There are 40 SEC Parties actively using the Combined Supplier User Role.
    - There are four instances where SEC Parties are using the Combined Supplier User Role only for the purposes of Import and Export Supplier.

What is the issue?

This wording in SEC Section H1.5 excludes a Party from using the same ID number for both the 'Import Supplier' and 'Export Supplier' User Roles unless it also intends to act in the 'Gas Supplier' User Role. Not allowing the use of the same User ID for the Import and Export Supplier User Roles means Parties must request multiple ID numbers from the SEC Panel. The Proposer notes that the DCC frequently receives requests to use the same User ID for multiple roles.

What is the impact this is having?

The Proposer believes that the SEC is unnecessarily exclusionary on this point. There are minor but unnecessary operational impacts on those Parties who must request multiple ID numbers from the SEC Panel. The DCC must also engage in further checks and monitoring to ensure these ID numbers 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. Solution

The solution involves changes to SEC Section H 1.5 'DCC Services'. The changes would allow Users to have the same identification number when acting in any combination of some or all the User Roles 'Import Supplier', 'Export Supplier' and 'Gas Supplier'.

The full amendments to the SEC are available in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
	Other SEC Parties	✓	DCC

Suppliers and Network Parties are impacted as they will be able to use the same User ID for multiple roles, saving them from approaching the SEC Panel for multiple ID numbers.

The DCC will be impacted as it will be able to offer the same User ID to SEC Parties wanting to act in different User Roles, saving it from minor administrative tasks.

DCC System

There are no DCC System impacts as part of this modification. The DCC is already able to issue the same User ID to SEC Parties, however the drafting of the SEC does not currently allow for this.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Devices

There is no impact on Devices resulting from this modification.

Consumers

There is no impact on consumers resulting from this modification.

Other industry Codes

There are no impacts on other industry Codes from this modification.

Greenhouse gas emissions

There is no impact on greenhouse gas emissions from this modification.

5. Costs

DCC costs

There are no DCC costs associated with this modification.

SECAS costs

The estimated SECAS implementation cost to implement this as a standalone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

Party costs

There are no SEC Party costs resulting from this modification.

6. Implementation approach

Approved implementation approach

The Change Sub-Committee (CSC) agreed an implementation approach of:

- **29 June 2023** (June 2023 SEC Release) if a decision to approve is received on or before 15 June 2023; or
- **2 November 2023** (November 2023 SEC Release) if a decision to approve is received after 15 June 2023 but on or before 19 October 2023.

This modification is seeking to make text changes only and therefore no system testing or lead time is required before this can be implemented. The earliest Release this modification can be implemented is the June 2023 SEC Release.

7. Assessment of the proposal

Observations on the issue

A Change Sub-Committee member noted that significant discussions had previously been held on the process by which SEC Parties obtain User IDs. They noted that if changes to this process are within the scope of this modification, then there will be DCC System impacts. SECAS has confirmed that

DCC System changes are not necessary as part of this modification as this seeks to clarify the SEC wording for something that is already possible in practice.

Another CSC member noted the original provisions were written during the initial User Entry Process Testing (UEPT) for Parties to become DCC Users and a series of assumptions were made on Party activities and their specific roles. These assumptions were never ratified, and it has become clear that there is a more diverse setup to Party roles which needs to be reflected in the SEC.

During the April CSC meeting, one member noted that this modification would allow new SEC Parties to use the same User ID for any combination of some or all the User Roles of Import Supplier, Export Supplier and Gas Supplier. They queried whether this would mean that existing SEC Parties who currently use multiple ID numbers could ask the SEC Panel for a new ID number to replace their existing numbers. Another member replied that this is possible, however they have investigated this and, in their experience, changing existing EUI-64 IDs was problematic.

Solution development

During a Requirements Workshop there was disagreement regarding whether the DCC would be able to implement this change without changing the Data Service Provider (DSP) data system. After investigation, SECAS and the DCC confirmed that this modification can take place without fundamental changes to the DSP data system as some Parties that are Import and Export Suppliers are set up as 'Combined Suppliers' (IS, ES and GS). Discussions between the DCC, SECAS and the Technical Architecture and Business Architecture Sub-Committee (TABASC) Chair discovered that some Parties have been registered in the Combined Supplier role, even though they are only the Import and/or Export Supplier for that premises. This means that these Import and/or Export Suppliers could also send commands to Gas Smart Metering Equipment (GSME), of which they are not the Supplier. However, these commands would be rejected at the meter and no information would be returned to the requesting Party.

The TABASC Chair questioned whether the current combined Supplier role is still needed; whether there was a problem with Suppliers using a separate ID for each User Role; and whether this could be altered. SECAS and the DCC established the number of active Users in this role to identify whether a change was warranted. These figures were subsequently presented to the TABASC. Members agreed there was not an issue and were supportive of this modification as it requires no changes to the DCC system. The Chair suggested the SEC was written in its current form as SEC Parties wanted to have one User ID for all User Roles Import Supplier, Export Supplier and Gas Supplier. Another member highlighted that it may have been written in this way as when the UEPT process at its inception SEC Parties were unsure of the implications.

8. Case for change

Business case

This modification was raised to ensure there is clarity in the SEC about User Roles which can have the same User ID number. There are no changes required to the DCC System required to deliver this solution. SECAS believes that the changes needed are minimal and will provide clarity for SEC Parties, whilst saving the DCC, SEC Parties and the SEC Panel time as they will not need to apply and manage multiple ID numbers.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification facilitates SEC Objective (b)[1] as this will improve efficiency for both the DCC and SEC Parties.

Industry views

The TABASC and Working Group was supportive of this modification throughout the Refinement Process as it improves clarity for SEC Parties and the DCC.

SECAS received four responses to the Refinement Consultation. All responses were supportive of implementation of this modification, with the replying Parties noting that this modification better facilitates SEC Objective (b). All Parties confirmed there would be no costs or impacts on them resulting from this modification. One Party noted that this modification would impact Energy Consumers as it removes any opportunities to potential delays for the customer. All feedback gained during the Refinement Consultation was positive. The full responses received are available in Annex B.

Views against the consumer areas

Improved safety and reliability

Neutral impact against improved safety and reliability.

Lower bills than would otherwise be the case

Neutral impact against lower bills than would otherwise be the case.

Reduced environmental damage

Neutral impacts on reduced environmental damage.

Improved quality of service

Neutral impacts on improved quality of service.

Benefits for society as a whole

Neutral impacts on benefits for society as a whole.

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[1] Enable the DCC to comply at all times with the objectives of the DCC licence and to discharge the other obligations imposed upon it by the DCC licence.

Appendix 1: Progression timetable

SECAS will issue the Modification Report Consultation between 19 April 2023 and 12 May 2023. SECAS expects this modification to undergo final vote at Change Board on 24 May 2023 under Self-Governance.

Timetable	
Event/Action	**Date**
Draft Proposal raised	9 Aug 2022
Presented to CSC for initial comment	16 Aug 2022
CSC converts Draft Proposal to Modification Proposal	20 Sep 2022
Business requirements developed with Proposer and DCC	20 Sep 22
CSC places modification on waiting list	18 Oct 2022
CSC removes modification from waiting list	20 Dec 2022
Modification discussed with the Working Group	1 Feb 2023
Modification discussed with the TABASC	2 Mar 2023
Refinement Consultation	6 Mar – 27 Mar 2023
Modification discussed at Change Sub-Committee	18 Apr 2023
Modification Report Consultation	19 Apr 2023 – 12 May 2023
Change Board vote	24 May 2023

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
DSP	Data Service Provider
ES	Export Supplier
EUI	Extended Unique Identifier
GS	Gas Supplier
GSME	Gas Smart Metering Equipment
ID	Identification
IS	Import Supplier
SEC	Smart Energy Code
SECAS	The Smart Energy Code Administrator and Secretariat
TABASC	Technical Architecture and Business Architecture Sub-Committee

Glossary	
Acronym	**Full term**
UEPT	User Entry Process Testing