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Paper Reference:	OPSG_71_1005_04
Action:	For Information

SECAS response to OPSG Action 50/11

1. Purpose

The purpose of this paper is to address the concerns raised by the Operations Group (OPSG) via Action 50/11¹. The action requested Smart Energy Code Administrator and Secretariat (SECAS) conduct a review of why further modifications have been needed to correct issues with modifications that have previously been implemented. This paper presents SECAS's conclusions following our investigation into this matter, for the OPSG's information.

2. Context

Please see below a summary of this action

Date	Comment	Feedback
1 Jun 2021	Action raised (OPSG_50)	
28 Sep 2021	Response provided for modifications to align multiple technical specification changes in a SEC Release (OPSG_58)	The OPSG members noted that their concerns were not addressed and there was not a defined process for escalating issues with modifications that had been implemented, and then efficiently rectifying them. A Distribution Network Operator (DNO) member questioned whether the legal text should be changed while the modification is being implemented. A DNO member noted that there needs to be a structured process for changing the legal text to assess what impact this may have on Users. The OPSG noted that this should be discussed further at the November meeting under an agenda item (OPSG_60).

¹ Action 50/11: SECAS to conduct a review of why further modifications have been needed to correct issues with modifications that have previously been implemented

3. Summary of the issues

We have identified two issues which had led to further modifications being needed following a previously implemented modification:

3.1 Modifications to align multiple technical specification changes in a SEC Release

Where a modification is approved and targeted for a specific Smart Energy Code (SEC) Release it will be implemented alongside other modifications. Where more than one modification, included in a SEC Release, impacts on a particular technical specification document, this may result in alignment issues once the individual sets of changes are combined. Correcting this requires a further modification to align the technical specifications.

An example of this would be [MP124 'Consequential changes to DUIS and MMC'](#).

3.2 Accidental omissions

In a small number of cases, a modification has been raised and implemented but the legal text to deliver the full solution was not entirely complete. This led to a further modification being raised to ensure a complete solution is delivered or a clarification made.

An example of this would be [MP191' Extending CHTS v1.0 & v1.1 IVP and MVP end dates'](#) which missed out extending two Applicability end dates. This subsequently led to [MP201 'CHTS v1.1 and GBCS v2.0 Applicability End Date'](#) to be raised.

4. Root cause and lessons learned

We have put in place the following steps to mitigate the risks of the above scenarios occurring.

4.1 Modifications to align multiple technical specification changes in a SEC Release

As a modification is developed, the technical specification changes are developed with the Data Communications Company (DCC)'s Service Providers (SPs). These changes are specific to that modification. The modification, when approved, is targeted for a specific SEC Release. When another modification is also developed and targeted for the same release there will be some complex interplay and possible misalignments in the technical specifications which will not be apparent when we are looking at a standalone modification. Once the SPs begin detailed design, development and build of the combined changes for the SEC Release, these misalignments will come to light and require a modification to implement minor and cost-free changes to the technical specifications to resolve.

Lessons Learned: This is unavoidable, and it is likely that a modification will need to be raised for every SEC Release which involves multiple technical specification impacting modifications to align the numerous technical specification changes.

4.2 Accidental omission

These issues are caused by human error. We have ensured a comprehensive review process is in place when developing legal text before it is issued to the industry, with input sought from the SEC Lawyer. The Proposer, the Working Group, relevant Sub-Committees and the wider industry (through consultations) also have opportunities to review and comment on the legal text prior to its approval.

Lessons Learned: We have reviewed and enhanced our processes for preparing and reviewing legal text for modifications to mitigate the risks of any future incidents like this.

5. Recommendations

The OPSG is asked to:

- **NOTE** the findings set out in this paper; and
- **AGREE** that action 50/11 can be closed.

Elizabeth Woods

SECAS Team

5 April 2022