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MP298 ‘Enhancements to Appendix AW – Performance Assurance’ Conclusions Report – version 0.1

About this document

This document summarises the responses received to the Modification Report Consultation regarding approval or rejection of this modification.

Summary of conclusions

Modification Report Consultation

SECAS received three responses to the Modification Report Consultation. Two respondents believed that the modification should be rejected. They considered the modification did not better facilitate any of the SEC Objectives. One respondent believed that the modification should be approved. They considered that the modification better facilitated SEC Objectives (a) and (g).

Modification Report Consultation responses

Summary of responses

The other two respondents believed the modification should be rejected. Whilst both respondents agreed with the principle of the modification, they expressed significant concerns regarding the legal text and constrained timeline of the modification.

Both respondents put forward proposed changes to the legal text, including removal of SEC Appendix AW 'Performance Assurance Framework' section 7.2 'Publication of SEC Risk Data'. This section relates to Performance Assurance Board (PAB) ability to publish SEC Risk Data on its website if unsatisfactory responses are received from SEC Parties. The respondents' rationale for the removal of section 7.2 is the fact that there is precedent of other Code Managers inappropriately publishing Data before subsequently withdrawing.

SECAS explained that the inclusion of publication of SEC Risk Data is a necessary step in the escalation process that is not a penalty or financial charge. SECAS went on to explain the two-step approval process before publication of any SEC Risk Data is undertaken, including approval from the SEC Panel. Additionally, SECAS highlighted the provisions of SEC Section 7.2 on which SEC Risk Data would be published.

The respondents also highlighted the fact that certain areas of the Smart Energy Code (SEC) should be removed from the remit of the PAB, namely SEC Section G 'Security', SEC Section I 'Data Privacy' and SEC Section Z 'Alt HAN Arrangements'. The reasoning for this is that SEC Parties should avoid unnecessary steps being added in escalation processes.

SECAS clarified that the remit of the PAB already excludes SEC Section G 'Security', and SEC Section Z 'Alt HAN Arrangements', in line with SEC Section C9 'Performance Assurance Framework' and as such explicitly stating the PAB excludes certain SEC areas is already accounted for. SECAS went on to explain that while SEC Section I 'Data Privacy' was not originally included in the modification, this will be considered, and a further modification may be required.