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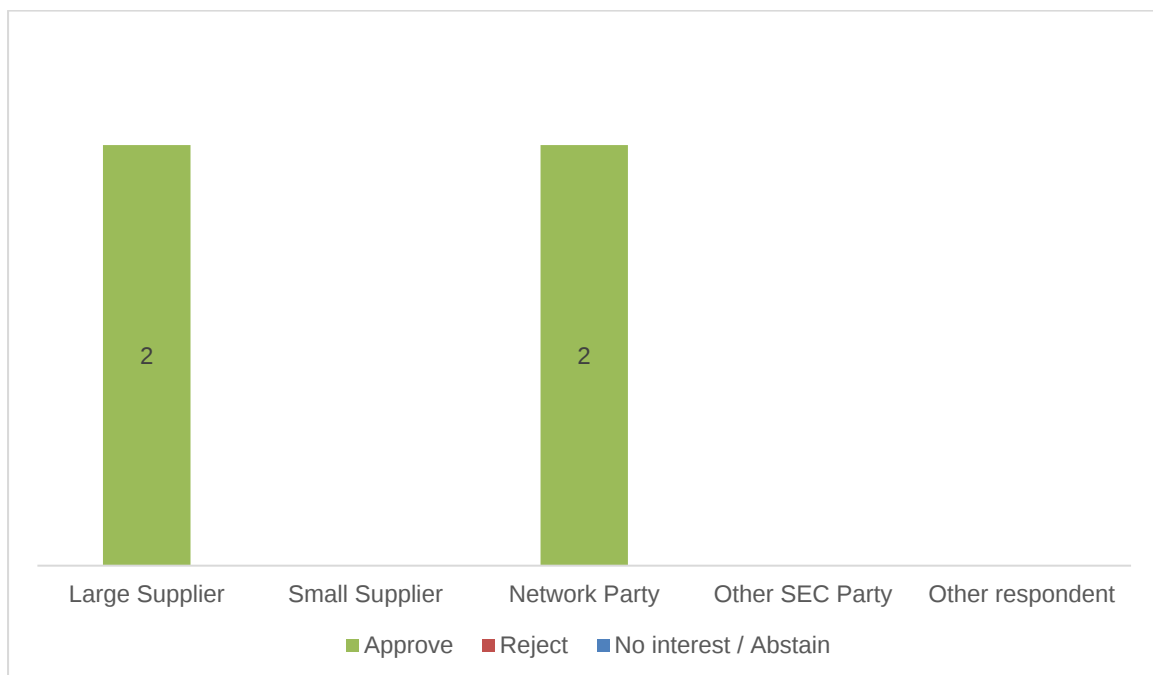
MP167B ‘Review of SEC documents (DCC Internal Systems change governance)’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP167B Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP167B should be approved or rejected?

Question 1			
Respondent	Category	Response	Rationale
National Grid Electricity Distribution	Network Party	Approve	-
Electricity North West Limited	Network Party	Approve	Any DCC projects or programme that impact Users should be subject to visibility and scrutiny. We welcome the Sub Committee Chairs request and the Programme Assurance Policy framework. We agree the Policy should be embedded with the SEC to ensure the DCC have adequate obligations regarding its compliance and to enable the SEC Panel to have sufficient oversight powers. Whilst this change only directly impacts the DCC it indirectly impacts all Users as with its absence the DCC are able to introduce new projects and policies which may impact us as a User, but which are not subject to adequate controls and visibility. Any impact to us as User may also impact our customers.
Utilita Energy Ltd	Large Supplier	Approve	We agree that the requirements in the PAP should be formalised, thus binding both DCC and industry to its contents. The absence of the PAP leaves only high-level objectives to be fulfilled, which has led to inconsistencies in the handling of projects. It also streamlines the oversight process for both SEC Parties and SECAS – by defining clear requirements and check points. We agree that this proposal better facilitates SEC Objectives (e) and (g), with the potential to ultimately contribute to (a).
Octopus Energy Ltd	Large Supplier	Approve	We believe that this modification would help create a more transparent and consistent approach to how the DCC Programmes and Projects are implemented and managed which would support SEC Objectives (b), (e) and (g).

Question 2: Please provide any further comments you may have.

Question 2			
Respondent	Category	Comments	SECAS Response
National Grid Electricity Distribution	Network Party	-	-
Electricity North West Limited	Network Party	No.	-
Utilita Energy Ltd	Large Supplier	We stress that DCC's priority should always be on delivering economically and operationally efficient results – with a focus on consumers. Any defined process has the potential to override these shared goals – given this, we request that the DCC are forthcoming with their own suggestions for refinements to the process over the coming years – and that Parties are receptive to such suggestions. Oversight and input into this proposal will require frequent and focussed effort from both the DCC and SEC Parties. The effective administration of the PAP is key to its effectiveness. Utilita have previously proposed a stand-alone group for the oversight and review of DCC Projects. We still believe this has the potential to be beneficial – as the expertise required to review and contribute to project development differs from that usually required for governance matters under the SEC. We would welcome a view on this proposal after the first few quarters of formalised PAP arrangements.	-

Question 2			
Respondent	Category	Comments	SECAS Response
Octopus Energy Ltd	Large Supplier	No further comments.	-
SEC Sub-Committee Chairs	N/A	Upon review of the Modification Report, legal text and PAP, the Sub-Committee Chairs requested that the next iteration of the PAP includes further detail surrounding testing expectations. This is to include Testing Approach Document (TAD) contents and reference the Security Sub-Committee (SSC) in respect of security. The Chairs stated that the PAP needs to have a similar level of detail to the principles and descriptions in the original Section T. The SSC Chair commented that the DCC June 2023 Release contained Smart Metering Key Infrastructure (SMKI) Recovery functionality that was redacted for Testing Advisory Group (TAG). They added that Section T would have referred to SMKI & Repository Entry Process Tests (SREPT) and placed obligations on the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) to review and approve. The SMKI PMA achieved this voluntarily with the DCC, which gave the TAG the assurance needed for the redacted aspects. The Chair advised that there will be other scenarios in the future that the PAP needs to cater for. The OPSG Chair commented that it would be beneficial to have better visibility regarding the Live Service Criteria (LSC) due to concerns arising from a DCC Change Request. The PAP currently states that the DCC will present to the Panel evidence against a set of defined LSC, Component Readiness and Residual risks/issues. The PAP may	SECAS has confirmed that the PAP is expected to be updated ahead of MP167B being implemented (provided it is approved). The proposed changes will take into consideration this feedback to further bolster testing, security and assurance requirements within the document.

Question 2			
Respondent	Category	Comments	SECAS Response
		potentially be further updated to state that this will also be presented to the OPSG.	