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

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 four responses to the Modification Report Consultation. All respondents believed that the modification should be approved. They considered the modification better facilitates SEC Objectives (b)¹, (e)² and (g)³.

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.

² Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

³ Facilitate the efficient and transparent administration and implementation of the SEC.

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Modification Report Consultation responses

Summary of responses

SECAS received four responses to the Modification Report Consultation, all to approve MP167B. One respondent (a Network Party) stated that any DCC project or programme that impacts Users should be subject to visibility and scrutiny. They also agreed the Programme Assurance Policy (PAP) should be referenced within the SEC to ensure the DCC has adequate obligations regarding its compliance and to enable the SEC Panel to have sufficient oversight powers.

Another Network Party respondent stated that the current absence of the PAP leaves only high-level objectives to be fulfilled, which has led to inconsistencies in the handling of projects. They felt that the modification will streamline the oversight process for both SEC Parties and SECAS by defining clear requirements and checkpoints. As a result, they felt that the modification better facilitates SEC Objectives (e) and (g).

A Large Supplier also felt that the modification would better facilitate SEC Objective (b), as it will create a more transparent and consistent approach to how the DCC Programmes and Projects are implemented.

Another Large Supplier respondent commented that DCC's priority should always be on delivering economically and operationally efficient results, with a focus on consumers. They felt that any defined process has the potential to override these shared goals. They requested that the DCC is forthcoming with their own suggestions for refinements to the process over the coming years and that Parties are receptive to such suggestions.

SEC Sub-Committee Chair feedback

During the Report Phase, SECAS also received feedback from the SEC Sub-Committee Chairs. 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 potentially be further updated to state that this will also be presented to the OPSG.

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.