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MP224 ‘SEC Performance Assurance Framework’

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 nine responses to the Modification Report Consultation. All respondents believed that the modification should be approved. They considered the modification better facilitated SEC Objectives (a)¹ and (g)².

¹ facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers’ premises within Great Britain.

² facilitate the efficient and transparent administration and implementation of this Code.

Modification Report Consultation responses

Summary of responses

All nine respondents supported the implementation of the modification. Two respondents (Large Suppliers) noted that a lot of the detail of the framework would be delivered by the newly formed Performance Assurance Board (PAB) after the Sub-Committee was set up. One of these respondents also considered that the detailed documentation, should be subject to final approval, not just industry wide consultation.

Within the legal text, the new clauses require the PAB develop and maintain these documents and therefore expect these to be drafted and consulted upon as first point of business of the PAB. Whilst the legal drafting does give final approval to the PAB on the documentation, it is stated that consultation must take place, due consideration be given to any comments received, and appropriate amendments be made considering those comments.

They also believed that an amnesty period should be in place to allow Parties to improve performance prior to any penalties being levied. SECAS notes the aims of the PAF are to improve service, it is not aimed to punish Parties and therefore the focus should not be punitive.

Another respondent (Large Supplier) considered that the members of the PAB should be different to the Panel representatives to ensure separation of responsibilities.

One respondent (Large Supplier) also noted that some of the examples given by RFI respondents, and detailed under the benefits section may fall outside of the scope of any PAB and therefore not be listed correctly within the Modification Report.

SECAS notes that some of the issues listed in the Request for Information (RFI), and the Modification Report, may not fall under the final scope of the PAF. However, whilst certain obligations are out of scope, the overall risk may include these risk drivers that can be managed by the existing provisions. There may also be other drivers that are contributing to the failure which link to other areas of the SEC.