

Stage 02: Initial Modification Report

What stage is this document in the process?



SECMP0003:

Deficiencies in the Service Request for setting Maximum Demand Configurable Time

This Modification Proposal proposes amending the DCC User Interface Specification (DUIS) service request 6.18.1 to align it with the Great Britain Companion Specification (GBCS). This will enable Electricity Network Operators (ENOs) to use one service request per year to specify the date range, time range, and days of the week, during which the Set Maximum Demand Configurable Time Period value can be recorded. The Proposer believes this would reduce the needed service requests from around a billion per year to around 30 million per year.



The recommendation is that this Modification Proposal should:

- Be progressed as a Path 2: Authority-Determined Modification
- And proceed to the Refinement Process.



Low Impact:
DCC, ENOs

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Any questions?

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About this document

This document is an Initial Modification Report. It has been issued to the SEC Panel to enable the Panel to carry out its initial consideration of the Modification Proposal.

1. Summary of Modification Proposal

This section provides an overview of SECMP0003. For further details on the Modification Proposal, please refer to subsequent sections. Defined Terms and acronyms used in this document are listed for reference in the Glossary (Section 9) of this document.

1.1 Summary of Modification

The Modification Proposal proposes enabling ENOs to send one service request per year to specify the date range, time range and days of the week, during which the Set Maximum Demand Configurable Time Period Value should be recorded.

1.2 Proposed Solution

To implement this modification, the Proposer proposes amending the DUIS service request 6.18.1 to align with GBCS. This change will also require changes to SMETS2 to specify the exact capability required for the recording of Maximum Demand during a configurable time period set by the ENO.

1.3 Impacts

The Proposer has identified that the modification will likely impact DCC and ENOs. Impacted SEC Subsidiary Documents are likely to include, inter alia:

- DUIS
- SMETS2¹ (Smart Metering Equipment Technical Specification 2)

1.4 Targeted Implementation Date

The Modification Proposal targets implementation in a release as soon as possible after DCC Live and considered for Release 2.0 scheduled for June 2017 or as soon as reasonably practicable thereafter. The Working Group will consider whether the implementation timetable is appropriate (see Supplementary Questions in the Terms of Reference in section 6 below).

1.5 Release Management and Testing Requirements

This Modification falls under the Panel's Release Management Policy. The testing requirements will be further informed in the Refinement process and form part of the

¹ It is acknowledged that some Subsidiary Documents are not yet designated. However, the DCC and industry are working to a baselined set and references here are to that baseline, where applicable. Similarly, some SEC text and Subsidiary Documents are pending revision, subject to consultation conclusions. It is anticipated that these baselined Subsidiary Documents and any future SEC changes will have been finalised by the time this Modification completes Refinement and the Modification will be applied to the version of the SEC/Subsidiary Document extant at the time of implementation.

Working Group considerations. Implications for Device testing or Assurance Certificates are the responsibility of the relevant SEC Party.

1.6 Proposed progression

This Modification must go through the Refinement Process pursuant to SEC Section D3.9(c).

Section 6 of this document contains a detailed timetable and the Working Group constitution and objectives.

2. Why Change?

2.1 What is the issue?

The primary purpose of the Set Maximum Demand Configurable Time Period service request is to enable ENOs to identify the customer's maximum demand during a specified time period over a range of days. This allows the ENO to record the maximum demand on a meter during a particular period when there is a specific concern about the demand on the network. This contrasts with the standard maximum demand register, which records a single maximum demand value regardless of when it occurred.

The ENO will typically use the Set Maximum Demand Configurable Time period to record the evening and winter peak load for each customer. This will normally be between the hours of 4.00 pm and 8.00 pm on any Monday to Friday between 1st November and 28th February.

The issue is that ENOs would need to send over 30 service requests per device per year when it requires weekday maximum demand values within a period of time. Over the year this would add up to a billion messages being sent for this specific service request.



What's the issue?

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What's the solution?

The Proposer proposes implementing a single command to be sent annually which would set the start and end dates, the days of the week, and the start and end times during which the Set Maximum Demand Configurable Time Period would record a maximum demand value. This would reduce the needed service requests from around a billion per year to around 30 million per year.

3. Proposed Solution

The Proposer proposes implementing a single command to be sent annually which would set the start and end dates, the days of the week, and the start and end times during which the Set Maximum Demand Configurable Time Period would record a maximum demand value.

3.1 Why Change?

The Proposer considers that the modification will substantially reduce demand on the DCC's network. As currently designed, it will currently require around a billion messages to be sent each year if ENOs use this command. If the modification is implemented, the required messages reduces to around 30 million messages. Moreover, the modification is expected to allow these 30 million messages to be spread over a 30 day period rather than 60 million to be sent every weekend during the winter period.

Additionally, the Proposer considers that using this feature of the smart metering system will assist ENOs to better understand maximum demand supplied from meters at times of specific interest when network demand is high. This will help deliver network benefits that are ultimately passed to customers.

3.2 Legal Text Changes

The necessary amendments to the SEC and relevant Subsidiary Documents will be prepared during the Refinement Process.

3.3 Applicable SEC Objectives

The Proposer considers that this Modification Proposal would better facilitate the achievement of SEC Objectives (a) and (e).

How the Modification Proposal would better facilitate achievement of the SEC Objectives

SEC Objective	Proposer views
(a) the first General SEC Objective is to facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain;	This Modification Proposal would better facilitate the achievement of this objective because it is inefficient to send billions of service requests over the network when ENOs need only send around 30 million.
(e) the fifth General SEC Objective is to facilitate such innovation in the design and operation of Energy Networks (as defined in the DCC Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy;	This Modification Proposal would better facilitate the achievement of this objective because it is more efficient for the recording of maximum demand. Furthermore, it will enable ENOs to manage their network more efficiently by identifying parts of the network under stress and potentially deferring investment where maximum demand does not coincide.

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4. Impacts & Costs

The following section sets out the initial assessment of the likely impacts arising from SECMP0003. Additional impacts may be identified by the Working Group in the Refinement Phase.

4.1 Impacts

The following is provided as an indication of likely impacts as known at this time. The Refinement Process will further inform the effects of SECMP0003.

Material Impact on Greenhouse Gas Emission

The Modification Proposal would have no material impact on Greenhouse Gas Emissions.

Impact on other Codes and documents

No other Energy Codes will be impacted.

Impact on Smart Energy Code Party Categories

Potential Impact	Party Category
The Proposer considers that the impact will be limited to ENOs because Service Request 6.18.1 "Set Maximum Demand Configurable Time Period" is only eligible to be used by ENOs.	ENOs

Impact on DCC Systems (subject to DCC assessment)

Area of DCC impacted	Potential Impact
DCC (Data and Communication Company)	The Proposer considers that because the functionality is already understood to be incorporated into GBCS, it is envisaged that the impact of the change would be limited to DCC update of DUIS and consequential changes to the structure of the 6.18.1 command. However, the Refinement Process will identify any other DCC costs, if there are any. These may include testing required by the DCC, or additional functionality required on DCC systems.
Data Service Provider (DSP)	To be investigated during the Refinement Process.
Communications Service Providers (CSP)	To be investigated during the Refinement Process.
Trusted Provider	To be investigated during the Refinement Process.



Are there any impacts?

The modification is expected to reduce network load.

There will also be an impact on DCC: DCC would need to change DUIS and consequential changes to the structure of the 6.18.1 command. There may be additional DCC impacts.

4.2 Costs

The costs of implementing SECMP0003 will be identified as it progresses through the Refinement Process. These costs will capture indicative DCC implementation costs as provided in their impact assessment responses and any SEC Party costs (where provided during the relevant consultations).

5. Implementation

The Proposer has requested that this modification is implemented in June 2017. During Refinement, it may become clearer whether June 2017 is achievable under the implementation timetable. In this event, the Working Group should identify this as part of their deliverables and this has been incorporated into the supplementary considerations in Section 6.5 below.

5.1 Modification Testing Requirements

The Panel Release Management Policy notes that, as part of the Panel's considerations of a Modification Proposal and the associated implementation timetable and date, the Panel will consider what testing is required and who will be eligible to participate. Section H14 requires the DCC to make provision for Modification Proposal implementation testing as part of its Testing Services.

The testing requirements under the Panel Release Management Policy are yet to be fully defined. It is anticipated that this Modification Proposal may require testing consistent with the SEC Section T arrangements for:

- i. DCC testing (Systems Integration Testing - SIT); and
- ii. Interface Testing (IT) with a representative number of Users and DCC to demonstrate the capability of the DCC solution to interoperate with User Systems.

In both cases, the approach for SIT and IT will be informed during the Refinement Process, hence SECAS has added this aspect to the considerations of the Working Group (see Section 6.5 below).

It is noted that the final testing scope and arrangements will be integrated under the Panel Release Management Policy approach for "R2".



When will the modification be implemented?

The Proposer has requested that this modification be implemented in June 2017.

6. Progression

6.1 Modification Path

Based on the initial review of the Modification Proposal and subsequent discussion with the Proposer, SECAS recommends that the appropriate Modification Path is Path 2 – Authority Determined.

6.2 Progression route

The Refinement Process is required because this Modification Proposal impact DCC's systems, which are the SEC criteria for following the Refinement Process (see SEC D3.9(c)).

The Refinement Process (SEC D6) requires that a Working Group is established by the Panel to undertake the Refinement Process. In outline, the objectives of the Working Group is to:

- consider the effects of the Modification Proposal on participants, Emissions and Other Energy Codes
- evaluate, develop and refine the content of the Modification Proposal, including where the WG considers an Alternative Proposal may be relevant, prepare and submit this into the Refinement Process with the Proposers Modification Proposal
- evaluate, and amend if applicable, the proposed implementation timetable of the Modification Proposal including with regard to consistency with the Panel Release Management Policy
- obtain and take into account the views of other relevant Sub-Committees (TBSC, SSC,PMA)
- obtain assessments from the DCC as to the impact and costs
- consider the SEC Objectives that may be better achieved if the Modification Proposal was implemented
- conduct a Consultation(s)
- consider any representations made to the WG by Parties
- deliver a Modification Report to the Panel in respect of the Modification Proposal

6.3 Working Group membership requirements

SEC Section D6.3 sets out that a Working Group must be at least 5 members with relevant expert knowledge. Therefore we propose that the Working Group should be made up of:

- The Proposer or a person nominated by the Proposer as a duly authorised representative of the Proposer;
- Working Group members:
 - who are broadly representative of the Users likely to be affected by the Modification Proposal, so that the Refinement Process is well informed in this case Suppliers and the DCC, although other interested Parties may come forward
 - with relevant experience and expertise in relation to the subject matter of the Modification Proposal (TBSC expertise need not be duplicated as this may be achieved through co-ordination between the WG and TSC);;
- A Chair (see following section)
- A Secretary (provided by SECAS)
- A Modification Analyst (provided by SECAS)

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The Working Groups can also be attended by:

- DCC representatives;
- Ofgem representatives;
- DECC representatives; and
- Any interested members from the Technical Sub-Committee (or its Technical and Business Expert Community).

6.4 Convening the Working Group

It is noted that Section D6.3 makes provision for the Panel, with the cooperation of the Parties to establish a standing list of persons with potentially relevant experience who may be willing to serve on Working Groups. As Modification Paths have only recently been enabled such a standing list is not available to the Panel.

Therefore, it is recommended that an open invitation is issued at this time, with a view to using this exercise as a means of identifying the constitution of any future standing membership that can be called upon as a Modifications Working Group.

Modification Working Group members are required to meet the SEC requirements to confirm in writing to SECCo that they agree to serve on that Working Group and to do so in accordance with this Code.

Working Group Chair

Section D6.4 enables the Panel to request that SECAS provides the chair for the Working Group. While the Modification process beds down, it is proposed that, to facilitate convening the Working Group in the first instance, SECAS provides the Chair. The Working Group, once constituted, may then proceed to appoint a Chair from within its Membership, if that is the majority view of the Members. This optionality would only be available at the first meeting to preserve continuity.

6.5 Working Group Terms of Reference

To meet the requirements of the Refinement Process set out in SEC Sections D6.8-D6.14 draft standard Terms of Reference are provided in Appendix B. The following questions have been identified for the Working Group to consider in order to fully assess the Modification Proposal.

Working Group Terms of Reference – supplementary matters to consider

What is the materiality of the issue?

Is the solution proposed in this SECMP0003 more efficient than the current command set?

Are there other deficiencies in the current solution that are addressed by SECMP0003?

What are the detailed changes to the SEC and/or SEC Subsidiary Documents to support this SECMP0003 (and its Alternative(s))

What are the systems impacts for DCC/User/Smart Meters?

What are the costs and lead times to introduce the solution in this SECMP0003 or its Alternative(s)?

Is the implementation timetable appropriate?

Are Consumers impacted by the Proposed (or any Alternative) solutions and to what extent?

What Modification Implementation Testing is required to implement the Proposed Modification, or any Alternatives?

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What are the implementation steps and activities required to implement the Proposed (or an Alternatives) Solution?

The above is not intended as an exhaustive list and it is expected that the Working Group will identify and address any other considerations that arise during the Refinement Process.

6.6 Timetable

As the Modifications process has only recently been activated, the timetable in Figure 1 below was put together in discussion with the Proposer and SECAS as a good faith estimate. A number of assumptions underpin this timetable:

- The Proposer has requested that the Modification Proposal is implemented in Release 2.0.
- The proposed timetable below has been built around a June 2017 implementation date, noting that the implementation date may need be flexible to accommodate the necessary implementation (and testing lead times), if the Modification is approved.
- The proposed timetable includes some assumed timescales for the turnaround of DCC's Impact Assessments and the Authority determination based on the indicative timescales provided by these entities.
- If the changes associated with this Modification require EC Notification, the proposed timetable does not currently capture the three month 'stand-still' during EC notification. This is on the basis that any representations received during the stand-still need not necessarily result in any material change to the notifiable document or agreed solution in any way
- The timetable has been drawn up based on this Modification Proposal progressing without cancellation or suspension under the "Smart Metering Implementation Programme: Guidance on Secretary of State involvement with industry-led modifications to the Smart Energy Code during the transition to enduring governance" issued by DECC.
- The timetable assumes that any Panel Sub-Committee inputs can be fed into the Refinement process at the appropriate time, and this may be subject to alteration.

Modification Timetable	
Activity	Date
Modification Proposal raised	23 February 2016
IMR considered by Panel	11 March 2016
Working Group meetings Indicative activities: • Initial considerations • Legal drafting • Sub-Committee feedback • Alternative(s) identified • Impact Assessments • Detailed evaluation	March - July
Working Group Consultation	August 2016

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Modification Timetable	
Final Working Group meeting Indicative Activities: • Consultation response summary • WG deliverables met • Assessment for Modification Report	August 2016
Panel reviews Modification Report	9 September 2016
Modification Report phase consultation	September 2016
Change Board vote	19 October 2016
Modification Decision by the Authority	November 2016
Implementation	June 2017

Figure 1

6.7 Grouping this Modification Proposal with others

There are a number of Modification Proposals that are currently entering the SEC process that have implications for a similar set of Parties and SEC Subsidiary Documents. It may be possible to bring efficiencies into their Refinement under one Working Group. For example, whilst the underlying content may not be directly related, each solution entails opening the Technical Specifications. There may be merit in grouping these under the Terms of Reference for a single Working Group so that the implications of changes to the Technical Specifications are consistently understood for the future.

SECAS is of the view that this is entirely consistent with the aim in the SEC of establishing standing Members to serve on Working Groups and will offer both value for money for the Panel budget and a reduction in commitment by Working Group Members who might otherwise have to attend several meetings to progress each Modification discretely.

SECAS considers that there may be potential to group this SECMP0003 with others for consideration by one Working Group and recommends that the merits of this are explored further when issuing the invitations for the Working Group.

7. Panel Initial Assessment

The Panel is requested to **NOTE** the contents of this paper for SECMP0003 and, pursuant to Section D3.6, **AGREE** the following as set out in this Initial Modification Report:

- whether to accept the Modification Proposal;
- it is a Path 2 Modification (taking into account the view expressed by the Proposer);
- that it is necessary for the Modification Proposal to go through the Refinement Process as set out in SEC Section 6.2;
- to establish a Working Group with the membership and Working Group Chair as set out in SEC Section 6.3;
- The supplementary considerations for SECMP0003 to supplement the standard Working Group terms of Reference set out in SEC Section 6.5;
- the Modification progression timetable set out in Figure 1 of SEC Section 6.6;
- whether SECMP0003 should be considered together with any other current Modification Proposal(s);
 - The potential to group SECMP0003 with other Modifications to gain efficiencies in the Refinement Process across a number of potential changes to the Technical Specifications.

8. Further Information

More Information is available in:

- Attachment **A**: Modification Proposal
- Attachment **B**: Working Group Terms of Reference

For further information, please see the [Modification Register](#) page of the SEC website.

Or contact the Code Administrator at secas@gemserv.com.

9. Glossary

The below terms listed in the below table are defined in SEC Section A.

Glossary	
Term	Acronym
Communications Service Providers	CSP
Data and Communication Company	DCC
Data Service Provider	DSP
DCC User Interface Specification	DUIS
Electricity Network Operator	ENO
Initial Modification Report	IMR
Interface Testing	IT
Secretary of State	SoS
Service Request	SR
Smart Energy Code Administrator and Secretariat	SECAS
Smart Energy Code Company	SECCo
Systems Integration Testing	SIT
Technical Sub-Committee	TSC