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Stage 04: Modification Report

SECMP0004:

Inclusion of industry Device Serial Number within the DCC Smart Metering Inventory

SECMP0004 seeks to extend the scope of the Smart Metering Inventory to add Device Serial Number for each Gas and Electricity Smart Meter. This will facilitate mapping between legacy systems and the Smart Metering Inventory. SECMP0004 will support the Change of Supplier process and ensure data integrity across industry.



SECMP0004 impacts the **Smart Metering Inventory** and how it is maintained.

Users who pre-notify Smart Meters (typically Suppliers) to the Smart Metering Inventory and those who are responsible for maintaining it, will be required to implement SECMP0004.

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

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About this document

This document is the Final Modification Report for SECMP0004. The Change Board will consider this report as part of their deliberations on whether to approve or reject the Modification Proposal.

This Final Modification Report has three attachments:

- Attachment A: Solution Design Document and Legal Text;
- Attachment B: Working Group detailed considerations; and
- Attachment C: Modification Report Consultation Responses.

1. Summary

This section provides an overview of SECMP0004. Defined terms and acronyms used in this document are listed in the Glossary (Appendix 1) of this document.

1.1 Why Change?

Legacy systems supporting the Change of Supplier (CoS) process rely upon serial numbers as the unique asset identifier. The Smart Metering Inventory (SMI) uniquely recognises each Gas and Electricity Smart Meter by its Globally Unique Identifier (GUID). To ensure that the correct data is used during a CoS event, the mapping of the Device Serial Number (DSN) for meters and the GUID is required.

1.2 Solution

SECMP0004 proposes to extend the scope of the SMI and to capture the DSN for each Gas and Electricity Smart Meter. This will allow suppliers to map the data held in the legacy systems and the SMI.

To ensure that the SMI becomes a reliable mapping tool, when pre-notifying Gas and Electricity Smart Meters, Users will be required to include the associated DSN. Suppliers will also be required to ensure that each Gas and Electricity Smart Meter pre-notified to the SMI before the implementation of SECMP0004 has its associated DSN populated in the SMI.

1.3 Impacts and Costs

Users who pre-notify Gas and Electricity Smart Meters to the SMI, and those who are responsible for maintaining it, will be required to implement SECMP0004. If approved, SECMP0004 will require User Testing, details of which are in section 5.2.

The estimated DCC implementation costs are circa £937,000. The DCC has included provisions for the potential cost of SECMP0004, should it be approved and implemented, into the DCC Charging Statement for Regulatory Year 2017/2018.

1.4 Implementation

SECMP0004 was initially considered by the Panel to have a material impact on competition and therefore be a Path 2 (Authority-determined) modification.

The recommended implementation for SECMP004 approach is:

- implementation on **28th June 2018**, if a decision to approve is made by **1st June 2017**; or
- implementation on **1st November 2018**, if a decision to approve is made after 1st June 2017, but before **2nd October 2017**.

1.5 Working Group's Views

The Working Group (WG) unanimously agreed that SECMP0004 should be approved. They noted the modification was more efficient than mapping tools (between the legacy systems and the SMI) being developed by each individual supplier. They noted the high implementation costs, but believed the benefits of centralised mapping ensuring the accuracy of a CoS event outweighed these costs; noting the potential Consumer impact when switching suppliers.

1.6 Modification Report Consultation Responses

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12 SEC Voting Groups (representing a total of 16 SEC Parties) responded to the Modification Report Consultation. Of the responses received, one expressed “no interest”, one abstained, and one expressed support of rejection. All other respondents supported the approval of SECMP0004.

2. Why Change?

2.1 Background

The Electricity Central Online Enquiry Service (ECOES) was established under the Master Registration Agreement (MRA), to assist suppliers during the Change of Supply (CoS) process. It allows the triangulation of data whereby a Meter Point Administration Number (MPAN) can be cross-checked against a site address from the Meter Point Administration Service (MPAS) and the associated Meter Serial Number (MSN). This ensures that suppliers get the correct data for the correct customers during a CoS.

Under the smart metering arrangements, the DCC is responsible for maintaining a record of Smart Metering Systems (SMS). These records are stored in the Smart Meter Inventory (SMI). The SMI includes, amongst other things, the MPxN (the Metering Point Administration Number/Reference Number depending on whether it's Electricity or Gas), device type/manufacturer/model and a Globally Unique Identifier (GUID) for each device. It does not currently include the MSN.

2.2 What is the issue?

The MSN is critical for suppliers to support the CoS process and to ensure data integrity across the industry. It is the key link between existing industry data flows. In order to allow for complete triangulation of smart device data for a customer/site, the MSN needs to be mapped to the MPxN and the GUID.

There is currently no central and consistent way to map the information held in ECOES (and other legacy systems) and the SMI. Suppliers may choose to implement workarounds to help with mapping. However, workarounds create risks, as the more individual sources of data that exist the more risk there is of data quality being corrupted. The electricity and gas industries already suffer from significant data quality issues around associating meters. Such issues are exacerbated on a meter exchange and, since the industry is on the verge of a huge meter exchange programme, the addition of GUID cross referencing will further compound complexity of the issue. A centrally provided approach for the MSN (via the Smart Metering Inventory) is key to process integrity and efficiency. Equally, the cost of suppliers individually developing these workaround solutions, allowing these solutions to communicate with each other and agreeing a governance framework will add cost to the industry. Providing a central solution is the most efficient option.

The lack of a robust central method to map and triangulate data means there is a risk that during a CoS event a customer may be delayed in switching supplier whilst incorrect data issues are being resolved. This modification aims to mitigate this risk.

The mapping of MSN is also key to support Ofgem's work on Smarter Markets and Faster Switching. BSC Modification P302 (developed to support Ofgem's work) requires the supplier to use the MSN to communicate details of the smart meter configuration to the Meter Operator before they receive any metering flows. SECMP0004 will remove the need of additional metering data flows to be sent purely to provide the supplier with the MSN.

3. Solution

3.1 Proposed solution

In February 2016 EDF Energy raised SECMP0004 to propose that the SMI include the MSN of each Gas Smart Meter (GSME) and Electricity Smart Meter (ESME).

For clarity, the Proposer has decided to call the MSN relating to ESME/GSME the ‘Device Serial Number’ (DSN) in the SMI. This is to futureproof the modification since the field may be required to support device types other than ESME and GSME as the market continues to evolve.

Users that pre-notify Gas or Electricity Smart Meters to the SMI would be required to include a corresponding DSN as part of the notification. To add to their existing SEC obligations¹, Users will also be required to ensure that the DSN is populated for meters pre-notified to the SMI before the implementation of SECMP0004, by a date that will be determined by the Panel. This will ensure that the SMI is complete and becomes a reliable mapping tool for Users.

To ensure that Users can discharge their obligations, the DCC will amend existing Service Requests (SRs) used for pre-notifying Devices to the SMI (SRV 12.2. Device Pre-Notification) and for updating the SMI (SRV 8.4 Update Inventory). To assist Users, when interrogating the SMI, the DCC will update an existing SR that enables Users to read the SMI (SRV 8.2 Read Inventory), as well as including the DSN in the following reports available to Users on the Self-Service Interface (SSI):

- RSMI_001 Installation Status Smart Meter Report
- RSMI_002 Smart Metering Devices Status and Firmware Report
- RSMI_003 Smart Metering Devices Status and Model Report
- RSMI_004 Communications Hub with No Attached Devices Report
- RSMI_005 Scheduled Service Requests Report
- RSMI_007 Device Certificate Report

Since there is a degree of uncertainty around the number of Gas Smart Meters and Electricity Smart Meters pre-notified to the SMI, it is proposed that the process for updating the SMI with the DSN for the already pre-notified meters is managed by the DCC. This is to avoid potential significant demand spikes that could lead to excess traffic and potential network availability problems.

Five Working Days after the implementation of SECMP0004, Users will be required to notify the DCC of the number of DSNs to be updated (to assist Users with fulfilling this obligation, the DCC will create a bespoke report on the SSI). Within five Working Days from receipt of such information from the Users, the DCC will confirm to each User how many ‘Update Inventory’ SRs it can send each day and the timing for sending these SRs. Users will then be expected to complete the process by the date that will be determined by the Panel. The DCC will submit monthly reports to the Panel setting each User progress against its obligation.

¹ As set out in clause 2.10 of SEC Appendix AC – Inventory, Enrolment and Withdrawal Procedures.

Legal text supporting the implementation of SECMP0004 can be found in Attachment A – Solution Design Document and Legal Text.

SECMP0004 will result in a new version of DUIS. The changes provided in Attachment A have been drafted against DUIS v1.0, if approved and implemented the changes will form part of and result in a new version of DUIS. The version number of this new version will depend on prior changes being implemented.

4. Impacts and Costs

4.1 Parties

Users that pre-notify Gas or Electricity Smart Meters to the SMI will be required to include a corresponding DSN as part of the notification. Users will also be required to ensure that DSN is populated for meters that were pre-notified to the SMI before the implementation of SECMP0004.

Users who implement SECMP0004 will be required to update their DCC User Interface to send and receive new versions of SRs that include the DSN.

Users (primarily supplier Users) will need to test SECMP0004 as part of a Release. The User Testing requirements can be found in section 5.2 and in Attachment A.

Overall, Parties have indicated a high-level range of potential implementation costs. These vary from under £50K to over £500K. These costs are driven by the number of SMI's that would need to be backfilled and/or the complexity of undoing existing workarounds. Therefore, the implementation cost for a Party is very organisation specific.

4.2 Central Costs

4.2.1 DCC

The table below details the cost of delivering the changes and services required to implement this Modification Proposal:

Implementation costs (excluding VAT)							
Implementation Phase:	Design	Build	Pre-Integration Testing	System Integration Testing	User Testing	Implementation to Live	Total
SECMP0004	<i>£121,400</i>	<i>£242,800</i>	<i>£242,800</i>	<i>£260,000</i>	<i>£20,000</i>	<i>£50,000</i>	£937,000

The DCC noted that implementing SECMP0004 at the same time as [SECMP0008](#) and [SECMP0011](#) would result in the following savings:

- a reduction of circa 20% in costs can be assumed for System Integration Testing and User Testing; and

- a reduction of circa 33% in costs can be assumed for Implementation to Live.

The combination of these savings would reduce the overall individual cost of SECMP0004 to approximately **£868,500**.

The DCC has included provisions for the potential cost of SECMP0004, should it be approved and implemented, into the DCC Charging Statement for Regulatory Year 2017/2018.

The complete DCC Impact Assessment undertaken on SECMP0004 is available on the SEC Website via the following link: [SECMP0004 DCC Impact Assessment v3.2](#).

4.2.2 SECAS

The Code Administrator's costs will be limited to the time and effort to making the necessary amendments to the SEC, release a new version to SEC Parties, and the publication of it on the SEC Website. This is estimated at approximately 2 Man Days effort, which will be approximately £1200².

4.3 Other potential impacts and costs

There are no other identified impacts on Consumers, Greenhouse Gas Emissions and/or other industry codes.

² Based on a blended rate of £600 per day.

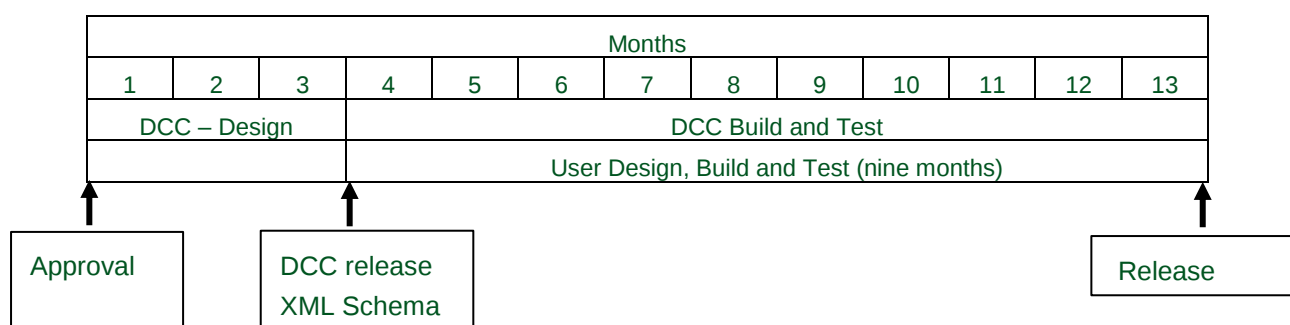
5. Implementation

5.1 Timelines

The WG noted that SECMP0004 should be implemented in the next available Release. The WG therefore recommends the following implementation approach:

- SECMP0004 to be implemented in the **June 2018 Release**, if a decision to approve is made by **1st June 2017**; or
- SECMP0004 to be implemented in the **November 2018 Release**, if a decision to approve is made after 1st June 2017 but before **3rd October 2017**

The DCC have indicated they require 13 months to implement SECMP0004 and would need three months from the approval date to build the XML Schema. This means the XML Schema would be available in approximately nine months prior to the Release implementation date. This would give Users wishing to implement SECMP0004 in June 2018, nine months to design, build and test their systems. The exact timescale will depend on when SECMP0004 is approved.



5.2 Testing

5.2.1 DCC Testing

As described in the [DCC's Impact Assessment](#) (available on the SEC Website), DCC will carry out Pre-Integration Testing (PIT) and System Integration Testing (SIT) for SECMP0004.

PIT comprises the tests that each Service Provider performs on its respective System changes, prior to the integration of all Service Provider Systems.

Suggested PIT scope would include:

- Production, review and agreement of a design to enable development;
- Low level design production, development, unit test and any rework to achieve PIT complete status;
- Data generation and loading into the Test Environment;
- Execution of System Tests through sufficient iterations to enable PIT complete;
- Design, implementation and execution of FAT scripts in accordance with assurance procedures used for Release 1.2; and
- Achieving PIT complete status and subsequent reporting.

SIT is the testing of DCC's Total System, which brings together the component parts of DCC's System (e.g. DSP and CSP Systems) to allow testing of the end-to-end solution by DCC. The SIT activity is done for every DCC System Release and incorporates the test and integration of multiple changes.

Additional SIT is recommended by DCC for a modification of this type. It should however be noted that the scope of SIT is likely to be more focused on regression testing to confirm that the changes applied as part of this modification have not had an impact on the wider DCC Total Systems.

Suggested SIT scope would at a high level typically include:

- System Test script and data design;
- Data generation and loading into a co-ordinated System Test environment; and
- Execution of System Tests through sufficient iterations to enable SIT complete.

5.2.2 User Testing

The Working Group agreed the following high level requirements for SECMP0004 User Testing:

- Testing should be optional for Users, although a minimum of two Users should undertake and pass User Testing of the SECMP0004 functionality before the new functionality goes live; and
- The Testing Environment that the DCC provides as part of Testing Services will be open to all User Roles and multiple Users within each User Role to ensure that any User wishing to test SECMP0004 can do so. This environment should be made available for a minimum of 15 Working Days.

It is anticipated that the DCC will drive, at the request of the Panel, the development of the Testing Services and documentation that will set out how it will complete the testing of the new functionality within its systems. This may be a form of focus Integration Testing and/or User Entry Process Testing. The testing approach documentation, will form a wider Release implementation document, that will cover SECMP0004 (if approved) and any other approved Modification Proposals that are included alongside or in addition to it.

Attachment A contains supporting legal text covering the requirements for the development of Release implementation documentation and testing approach documentation.

6. Case for Change

This section contains the views of the Proposer and WG regarding the modifications benefits and drawbacks against the SEC Objectives.

6.1 Proposers views

The Proposer originally stated that SECMP0004 would benefit General SEC Objective (a) because of increased data integrity across the industry. Through the development SECMP0004, the Proposer also noted that SEC Objective (d) would also be better facilitated since it would ensure the accuracy of CoS promoting greater competition in the market.

The Proposer noted that some suppliers may have already developed workarounds for mapping MSN to GUID. However, they believed that not all suppliers were in the same position, particularly Small Suppliers. It was also noted that having a centralised mapping process would be more cost effective than a per User solution which could be a significant cost on individual organisations to develop.

The Proposer felt SECMP0004 is a pragmatic solution that would provide a central tool which helps ensure better quality data through the GB energy industry, avoiding varying workarounds between different Parties.

6.2 Working Group's discussions

When considering the benefits and drawbacks of SECMP0004 the WG discussed the following:

Data Quality

The WG noted that SECMP0004 doesn't introduce MSN, but it does put the information in one central place. This allows mapping from GUID which is critical in transitioning between legacy and Smart Metering Systems. Following the MPAN, the MSN is the most frequently used identifier for legacy devices. Having the MSN in the SMI would allow suppliers to improve the tracking of smart devices by relying on additional legacy tracking.

The group noted that the electricity and gas industries already suffer from significant data quality issues around associating meters. Such issues are exacerbated on a meter exchange and, since the industry is on the verge of a huge meter exchange programme, the addition of GUID cross referencing will further compound complexity of the issue. It was believed that SECMP0004 delivered a pragmatic solution, as the alternative was to do nothing which would lead to data degradation. The electricity and gas industries are based upon the flow of correct data between Parties. If this data is incorrect, Parties will not be able to make accurate business decisions, settlement may become inaccurate and customers billing incorrect.

The legacy tracking methodology is deeply integrated into many BAU processes. As such having the MSN in the SMI would allow to increase confidence that assets are tracked.

Churn is a key issue

The WG discussed that since the introduction of the Balancing and Settlement Code (BSC) Modification P302, several workarounds had been created. These workarounds are effective now and suppliers can map devices within their organisation. However, some WG Members believed that these workarounds create risks as the more individual sources of data that exist, the greater chance of data quality being corrupted. Equally, the cost of suppliers individually developing these workaround solutions, allowing these solutions to communicate with each other, and agreeing a governance framework will add cost to the industry. Providing a central solution is the most efficient option.

In addition, the lack of a robust central method to map and triangulate data means there is a risk that on a CoS event a customer may be delayed in switching supplier whilst incorrect data issues are resolved. This modification aims to mitigate this risk.

The WG also noted that it should not be good practice to allow workarounds to become normal process.

Is the cost worth it?

The WG noted that it would be extremely difficult to quantify the cost benefit. If this modification is not implemented, there is uncertainty of how much it would cost individual organisations to implement a workaround in their back systems to help triangulate data. Equally, the WG questioned how you could put a price on the potential degradation of data quality caused by the individual workarounds in place; and how you could come up with a justifiable cost to ensure data quality.

The WG noted the range of Party implementation costs returned in the consultation. They agreed with the views of the majority of respondents who believed that it was difficult to quantify the benefits this modification would bring in terms of process efficiency and data accuracy. However, the group noted that despite the difficulty SEC Parties had in quantifying the benefit to their organisation the SEC Parties supported the Modification Proposal.

The WG discussed that respondents had echoed their concerns about high central implementation costs from the DCC. However, the WG also noted that those organisations still supported the change and as such had indicated that even with high implementation costs there must be benefits for their business. The WG reiterate the point that it was more cost efficient for SEC Parties to have a central solution than spend significant costs in developing in-house workarounds.

There is a potential option to amend GUID rather than add MSN into SMI. However, the group noted that impacting GUID was less costs effective, since it impacts non-SEC Parties and has large cross-code implications.

Overall the group believed that the benefits of SECMP0004 outweighed the implementation costs (which they have noted were extremely high). They felt that the benefit of being able to track meters on a CoS event meant customers would not be unduly impacted in the move to a smarter market where legacy systems are replaced.

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Without the ability to map this information, data would degrade and the likelihood of errors impacting the customers would increase.

6.3 Working Group Consultation responses

Nine Parties responded to the Working Group Consultation (5 Large Suppliers, 3 Networks and 1 Other SEC Party). Eight of the nine respondents agreed with the WG views against the SEC Objectives and believed that SECMP0004 should be implemented. One Supplier did not support the modification as they felt that existing triangulation and access to ECOES and Data Enquiry Service (DES) was sufficient, and that SECMP0004 did not add additional benefit. Full responses and views and the WG consideration of the responses are contained in Attachment B.

The group noted that the majority of respondents had indicated that they would need circa 12 months to implement the change. They also noted that several respondents had commented on the importance of the change and that delivering it as soon as possible was essential.

A number of respondents had raised concerns about the cost of the DCC delivering SECMP0004. The WG echoed these views and noted that unless there was greater detail about the level of costs then there was a risk this modification would either be rejected or certainly sent back into the process. The WG did note that the majority of respondents believed that in spite of the cost there was benefit to implementing this modification for the reasons previously outlined by the WG.

They also noted that one respondent has an existing workaround which they had development, meaning this modification is not required.

6.4 Sub-Committee views

The Security Sub-Committee (SSC) has been kept informed throughout the refinement of SECMP0004 and noted no security concerns.

The Technical Architecture and Business Architecture Sub-Committee (TABASC) also noted no concerns regarding the impacts of SECMP0004 on the Technical and Business Architecture.

As the changes proposed by SECMP0004 do not relate to Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) matters, the Sub-Committee was also unaffected by this modification.

The Alternative Home Area Network (Alt HAN) forum is also unaffected by SECMP0004, as the changes do not relate to Alt HAN matters.

6.5 Working Group's views against SEC Objectives

The WG (including the Proposer) unanimously agreed that SECMP0004 better facilitates the applicable General SEC Objectives:

- **(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; and
- **(d)** the fourth General SEC Objective is to facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

The majority of the WG agreed to SECMP0004 better facilitating SEC Objective (a), whilst one WG Member believed that SEC Objective (d) was the more relevant objective that would be better facilitated. The WG Member did not believe that benefits to CoS were an operational issue, but instead facilitated competition.

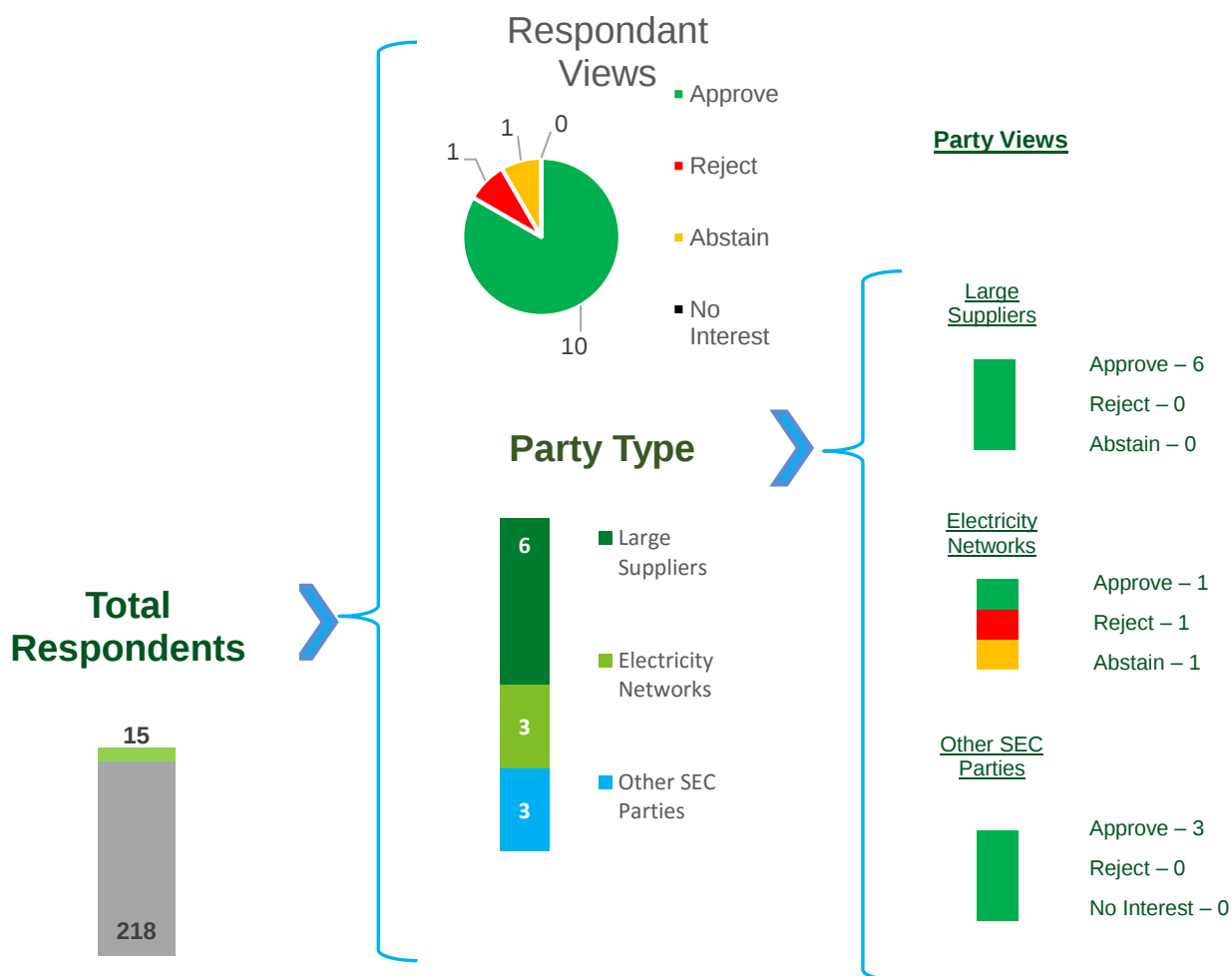
The table below provides the WG's rationale with respect to its views on the SEC Objectives:

Summary of Working Group's view against the SEC Objectives		
SEC Obj	Benefits	Drawback
(a)	• Facilitates the mapping of the legacy systems and the SMI, and supports industry end-to-end business processes, such as the CoS process. • Gives the SMI a shared mapping tool, which is likely to be more cost effective than each supplier developing own mapping tools.	None
(d)	• Assists the accuracy of data and ensures reliability on a CoS event	None

7. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. 11 respondents, representing a total of 15 SEC Parties, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment C.

7.1 Summary of Responses



7.2 Summary of Modification Report Consultation respondent's views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0004		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (a) Objective (d)	Suppliers restated that SECMP0004 will lead to better data quality throughout Industry.	- High cost of implementation. - Some Parties have already developed their own system mapping between MSN and GUID.
Summary of Networks' views for and against SECMP0004		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (a) Objective (d)	Network Parties noted that that SECMP0004 will improve data quality through additional confirmation	High cost of implementation.
Summary of Other SEC Party views for and against SECMP0004		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (a) Objective (d)	N/A	N/A

8. Change Board Decisions

Each Change Board Member is requested to:

- **CONSIDER** the Final Modification Report and the Modification Report Consultation Responses (Attachment C);
- **CONSIDER** whether or not the Final Modification Report should be returned to the SEC Panel with recommendation for further clarification and/or analysis;
- **VOTE or ABSTAIN** on the Modification Proposal; and
- **PROVIDE** rationale as to whether the Modification Proposal will or will not better facilitate the SEC Objectives.

Appendix 1 – Glossary and References

Glossary	
Description	Term
BEIS	Department for Business Energy and Industrial Strategy
CoS	Change of Supplier
DCC	Data Communications Company
DES	Data Enquiry Service
DSN	Device Serial Number
ECOES	Electricity Central Online Enquiry Service
GUID	Globally Unique Identifier
SMI	Smart Metering Inventory
SR	Service Request
SRV	Service Reference Variant
SSI	Self-Service Interface

References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	Link
SECMP0004 – Modification Proposal Form v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0004/secmp0004---modification-proposal-form.pdf?sfvrsn=2
SECMP0004 – Initial Modification Report v1.0	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0004/secmp0004---initial-modification-report-1-0.pdf?sfvrsn=2
SECMP0004 – DCC Preliminary Assessment v1.1	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0004/secmp0004_dcc_pa-v1-1.pdf?sfvrsn=2
SECMP0004 – DCC Impact Assessment v3.2	https://www.smartenergycodecompany.co.uk/docs/default-source/modificationfiles/secmp0004_dcc_impact-assessment-v3-2.docx?sfvrsn=0
SECMP0008 – SECAS Modification Register	https://www.smartenergycodecompany.co.uk/modifications/modification/SECMP-8
SECMP0011 – SECAS Modification Register	https://www.smartenergycodecompany.co.uk/modifications/modification/SECMP-11

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