

Stage 01: Initial Modification Report

SECMP0020:

Removal of the confidential classification of the unique identifiers listed in SEC Schedule 5

This Modification Proposal seeks to remove the confidential classification requirement in SEC Schedule 5, which prohibits the publication and disclosure of the unique identifier(s) described within it.



The recommendation is that this Modification Proposal should:

- follow Path 3: Self Governance; and
- proceed to Consultation.

Low Impact:



- SEC Panel and SECAS.

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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SECMP0020

Initial Modification Report

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About this document

This document is an Initial Modification Report that enables the SEC Panel to carry out its initial consideration on how this Modification Proposal should be progressed through the Modification Process. The Panel will consider this report at their meeting on 14th October 2016.

1. Summary

This section provides an overview of SECMP0020. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (Section 9) of this document.

1.1 Why Change?

SEC Schedule 5 'Accession Information' specifies that the unique identifier (Market Participant Identifiers (MPIDs)) associated with Network Operators and Suppliers as well as the unique identifier by which Meter Operators and Meter Asset Managers are identified be treated as confidential.

Due to this confidentiality restriction, this information cannot be provided, irrespective of SEC Party requests, within information provided on the SEC Website. A specific example being the ID Allocation Excel spreadsheet.

1.2 Solution

Western Power Distribution (the Proposer) is seeking to remove the three iterations of the following clause from SEC Schedule 5: "[This information shall be treated as confidential and not disclosed on the Website.]" This will allow SECAS to include these unique identifiers in information made available to SEC Parties on the SEC Website.

1.3 Potential Impacts

SECMP0020 proposes amendments to SEC Schedule 5 "Accession Information".

There should be minimal impact on SEC Parties as they provide the information as part of the accession process currently. The Modification Proposal would allow this information to be made available to SEC Parties via the SEC Website.

1.4 Proposed progression

The Proposer and SECAS propose that this Modification Proposal should be progressed as a Path 3 Modification (Self-Governance). Changing the treatment of the unique identifiers from confidential to non-confidential is non-material and requires minimal changes to the SEC.

The Proposer and SECAS propose that SECMP0020 should be implemented 5 Working Days (WDs) following the end of the Change Board vote 10WD referral period. This would mean that SECMP0020 could be implemented on an estimated date of 14th December 2016. This is subject to the modification proceeding as a Self-Governance, Path 3 Modification. The indicative progression timetable for SECMP0020 can be found in section 5.

2. Why Change?

2.1 Background

When the SEC version 4.0 (SEC4.0) was designated on 14th January 2015, it was noted that the unique identifiers identified under the MRA and the UNC for Suppliers, and Network Parties and the unique identifiers that identify Meter Asset Managers (MAMs) or Meter Operators (MOPs) provided as part of the Accession Process should be treated as confidential. Therefore, this could not be made available on the SEC Website.

This information would then be passed on to the DCC and held as confidential in the SEC. Following this the SEC Schedule 5 was amended to require that these MPIDs would be held as confidential in the SEC.

2.2 What is the issue?

The unique identifiers (known as Market Participant Identifiers (MPIDs)) for Suppliers, Network Parties and for SEC Parties that are MOPs and MAMs are required by SEC Schedule 5 to be treated as confidential. The information cannot be made available to SEC Parties through mediums that may aid their internal processing. A consequence of this is that SEC Parties must put in place their own extra steps and activities outside of the SEC to manage the information they need.

If the unique identifiers were not treated as confidential, the information could be provided on the SEC Website enabling a central point for SEC Parties to more easily identify other SEC parties. This information would be in addition to the SEC specific EUI-64 Identifiers and Signifiers, along with address information that is currently available through mediums such as the ID Allocation Spreadsheet.

If the confidentiality requirement was removed as noted above, the unique identifiers as requested by the Proposer would be captured within the SEC Panel's ID Allocation Procedure and ID Allocation Excel spreadsheet.

As the SEC develops and the Smart Metering Implementation Programme (SMIP) progresses, Parties interaction will increase. Facilitating the availability of the unique identifiers to SEC Parties would lead to further efficiency.

3. Solution

3.1 What's the solution?

Western Power Distribution (the Proposer) seeks to remove the confidential classification provisions in SEC Schedule 5 which prohibit the publication and disclosure of the unique identifier(s), described within it, on the SEC Website.

This Modification Proposal would also enable the unique identifiers to be included in the ID Allocation Spreadsheet, published on the SEC Website. This would aid SEC Parties in the identification of other SEC Parties. If SECMP0020 is approved, the [ID Allocation Procedure document](#) and related Excel spreadsheet will be updated to capture the provision of these unique identifiers.

It is worth noting that this information is already available freely through other mechanisms, e.g. via the ELEXON website in the case of the Balancing and Settlement Code (BSC). Therefore, this change will have no impact on security.

3.2 Draft Proposed Legal Text

The Proposed SECMP0020 legal drafting to deliver the Modification Proposal solution is provided in Attachment B.

3.3 Views against SEC Objectives

The table below highlights the Proposers view on how this modification would better facilitate the achievement of the SEC objectives.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.	This Modification Proposal will enable SEC Parties to efficiently map unique identifier information to SEC Parties. SECMP0020 will aid SEC Party process efficiency by enabling quicker identification of SEC Parties. It will also aid organisations by having the information is able to be provided within the ID Allocation Procedure excel spreadsheet.

4. Potential Impacts and Costs

4.1 Impacts

The following section sets out the initial assessment of the likely impacts arising from SECMP0020.

Potential Impacts of SECMP0020	
Smart Energy Code Parties	
Suppliers	No impact.
Networks	
DCC	
Other	
Systems	
DCC Systems	No impact.
User Systems	
Smart Metering Systems	
Other	
Impact on Consumers	
No Impact	
SEC and Subsidiary Documents	
SEC Sections	SEC Schedule 5, paragraphs 13, 14 & 15 will have the references to confidentiality removed. The proposed legal changes can be found in Attachment B.
Subsidiary Documents	No impact.
Other Industry Codes and Documents	
No impact.	
Greenhouse gas emissions	
No impact.	

4.2 Costs

The costs to implement this change will be limited to the Code Administrator's time and effort to making the necessary amendments to the SEC and release a new version to SEC parties and the publication of it on the SEC Website. The table below sets out the estimated WDs required to implement this change:

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
- Application of approved changes to the SEC - Publication of new version of the SEC on the SEC website and issuance to SEC Parties - Review and update any impacted SEC guidance materials	2 Man Days maximum	£1200 ¹

¹ Based on a blended rate of £600 per day.

5. Proposed Progression

5.1 Modification Path

It is proposed that SECMP0020 is progressed as a Path 3: Self-Governance Modification Proposal.

None of the criteria that would define this modification as having a material impact and therefore a Path 2: Authority Determination Modification Proposal (as per SEC Section D2.6 (a), (b), (c), (d) and (e)), are believed to be met.

The changes necessary to support this Modification Proposal are minor and therefore refinement by a Working Group should not be required. Therefore, the Modification Proposal can be submitted straight for Modification Report Consultation prior to Change Board vote.

5.2 Progression Timetable

As SECMP0020 does not require refinement, a draft Modification Report, has been prepared and is provided as Attachment C. Also attached to this IMR is the proposed Modification Report Consultation response form, provided as Attachment D.

5.3 Indicative Progression Plan

The following is an indicative progression timetable, based on SECMP0020 progressing to Modification Report Consultation as a Path 3: Self-Governance modification.

Modification Timetable		
Activity	Start	Finish
Modification Proposal Raised	Mon 03/10/16	n/a
Panel reviews Initial Modification Report	Mon 7/10/16	Fri 14/10/16
Modification Report stage	Mon 19/10/16	Fri 9/11/16
Change Board vote	Wed 16/11/16	Wed 23/11/16
Implementation	5 Working Days after end of the 10WD referral period (estimated date: 14 th December 2016)	

6. SEC Panel Decisions

The Panel is requested to **NOTE** the contents of this IMR for SECMP0020 and, pursuant to SEC Section D3.6, **AGREE** the following as set out in this Initial Modification Report:

- Whether to accept the Modification Proposal;
- That it is a Path 3 Modification Proposal (taking into account the view expressed by the Proposer);
- That the Modification Proposal does not require refinement as set out in Section D6.2;
- The Modification progression timetable set out in Section D6.3; and
- To submit SECMP0020 for Modification Report Consultation.

7. Further Information

More Information is available in:

- Attachment **A**: Modification Proposal
- Attachment **B**: SECMP0020 draft legal text
- Attachment **C**: draft Modification Report
- Attachment **D**: SECMP0020 Report Phase Consultation Response form

For further information, please see the [Modification Register](#) page of the SEC website, or contact the SECAS Helpdesk at secas@gemserv.com.

Appendix 1 – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
	Accession	Process through which applicants become SEC Parties.
BSC	Balancing and Settlement Code	The Legal document setting out the rules for the operation and governance of the Balancing Mechanism and Imbalance Settlement. All licensed electricity generators and suppliers must sign up to the BSC and other interested parties may also choose to do so
	Fast-Track Modifications	Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).
	General SEC Objectives	The SEC Objectives are those objectives that the SEC has been designed to achieve.
GBCS	Great Britain Companion Specification	A SEC Subsidiary Document that describes the HAN interfaces of the ESME, GSME, CH, HICALCS, IHD and PPMID.
	Greenhouse Gas Emission	Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).
MPID	Market Participant Identifier	This is a four alpha character ID and is registered within Market Domain Data (MDD) which maintains key information essential to the operation of the Supplier Volume Allocation arrangements.
MRA	Master Registration Agreement	The Master Registration Agreement (MRA) provides a governance mechanism to manage the processes established between electricity suppliers and distribution companies to enable electricity suppliers to transfer customers
MAM ID	Meter Asset Manager	An agent appointed by a gas Supplier to install and maintain gas meters.
MAP ID	Meter Asset Provider ID	The owner of a device to whom the registered supplier pays rents.
MOP ID	Meter Operator Participant ID	An agent appointed by an electricity supplier to install and maintain electricity meters.
MPAN	Meter Point Administration Number	number used to uniquely identify electricity supply points in Great Britain
MPRN	Meter Point Registration Number	A number used to uniquely identify gas supply points in Great Britain.

Glossary		
Acronym	Term	Plain English Summary
	Other Systems	Other systems identified in the section Statement of Impact on Central Systems.
	Party Category	Means one of the following categories: - the Large Supplier Parties collectively; - the Small Supplier Parties collectively; - the Electricity Network Parties collectively; - the Gas Network Parties collectively; or - the Other Sec Parties collectively. (Section A1, SEC Stage 3.0).
	Path Type	Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: Path 1 Modifications: Authority-led (Section D2.4/D2.5, SEC Stage 3.0) Path 2 Modifications: Authority Determination (Section D2.6, SEC Stage 3.0) Path 3 Modifications: Self-Governance (Section D2.7, SEC Stage 3.0) Path 4 Modifications: Fast-Track Modifications (Section D2.8, SEC Stage 3.0)
RDP	Registration Data Provider	Network operators charged under licence obligation with providing registration data to the DCC (Xoserve for gas registration data, the Distribution Network Operators (DNOs) and independent DNOs (iDNOs) for electricity registration data)
	Smart Metering Systems	Means a system installed at premises for the purposes of the Supply of Energy to the premises that, on the date it is installed, as a minimum; (a) consists of the apparatus identified in; (b) has the functional capability specified by; and (c) compiles with the other requirements of, the Smart Metering Equipment Technical Specification that is applicable at the date (Section A1, SEC Stage 3.0). In summary, this includes: - Gas Smart Metering Equipment; - Electricity Smart Metering Equipment; - In Home Display; - Prepayment Interface Device; and - HAN Connected Auxiliary Load Control Switch.
UNC	Uniform Network Code	The Uniform Network Code (UNC) is the hub around which the competitive gas industry revolves, comprising a legal and contractual framework to supply and transport gas.
	Urgent Proposal	Means a Modification Proposal deemed an Urgent Proposal where the Authority directs the Panel to treat the Modification Proposal as an urgent Proposal (whether following a referral by the Panel pursuant to Section D4.5, or at the Authority's own initiation) (Section D4.5/D4.6, SEC Stage 3.0).
	User Systems	Means, in respect of each User (DCC User), the Systems of that User (including, where relevant, those of its Supplier Nominated Agent) used in relation to the Services and/or Smart Metering Systems (Section A1, SEC Stage 3.0).

References

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

Links and References	
Description	Link
A Consultation on New Smart Energy Code Content (Stage 4) and consequential/ associated changes to licence conditions	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4 - _Consultation_Document.pdf