Smart Energy Code

SEC Smart Energy Code

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What stage is this document in the process?

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

Stage 01: Initial Modification Report

SECMP0029:

Business Continuity and Disaster Recovery Testing Amendments

This Modification Proposal seeks to amend the DCC obligations on the Business Continuity and Disaster Recovery (BCDR) to ensure that Service Requests (SRs) are processed as soon as possible to reduce customer impacts.

P2

Refine

The recommendation is that this modification should:

- follow Path 2: Authority Determined
- be progressed through the Refinement Process

!

Potential Impact on:

- Data and Communications Company (DCC); and
- DCC Users

Proposer

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Any questions?

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Contents

About this document

This document is an Initial Modification Report (IMR). It enables the SEC Panel to carry out its initial consideration on how this Modification Proposal should be progressed through the Modification Process.

The Panel considered the Initial Modification Report at its meeting on 13th January 2017.

This Initial Modification Report has two attachments:

- **Attachment A: SECMP0029 - Modification Proposal Form**
- **Attachment B: Working Group Terms of Reference**

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1. Summary

This section provides an overview of SECMP0029. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this IMR are listed in the Glossary (Appendix 1) of this document.

1.1 Why Change?

The DCC are not currently required to retain all received Service Requests (SRs) during Business Continuity and Disaster Recovery (BCDR) testing.

Whilst User driven SRs may be logged through internal DCC User processes – Utilita Energy (the Proposer) noted that BCDR testing could result in customer driven SRs (such as SR 2.2 ‘Top Up Device) being lost. Any loss of these types of SRs could impact the customer experience and could potentially result in unintended disconnection of supply.

1.2 Solution

The modification seeks to amend SEC Section H10.11 (Testing the Business Continuity and Disaster Recovery Procedure) in order to minimise the disruption caused during BCDR testing.

1.3 Potential Impacts

SECMP0029 is expected to impact the DCC and DCC Users, as it will affect how the DCC treat SRs during BCDR testing.

1.4 Proposed Progression

The Proposer proposed that SECMP0029 is progressed as Path 3 Self-Governance modification. The Panel decided to progress the modification as a Path 2 Authority Determined modification.

It is also recommended that SECMP0029 proceeds to the Refinement Process due to the Modification Proposal having an impact on DCC Systems, as per the requirements in SEC Section D3.9(c).

2. Why Change?

2.1 Background

SEC Section H10.9 (The Business Continuity and Disaster Recovery Procedure) sets out the requirements that the DCC must comply with. Specifically, the DCC must comply with the requirements within the Business Continuity and Disaster Recovery Procedure.

Compliance with this procedure ensures that there is no significant disruption to the provision of any of the Services provided by the DCC. Where there is any such significant disruption, the provision of those Services is restored as soon as is reasonably practicable.

SEC Section H10.11 (Testing the Business Continuity and Disaster Recovery Procedure) sets out the requirements for the (at least) annual testing of the disaster recovery and business continuity arrangements to ensure the BCDR Procedure remains suitable.

2.2 What is the issue?

The requirements in Section H10.11 do not include any provisions to minimise the disruption of DCC's Services during BCDR testing. Whilst the DCC is required to restore the provision of DCC Services under the BCDR Procedure as soon as reasonably practicable, there are no SEC requirements to retain Service Requests during the testing of the BCDR Procedure or details on how the DCC manage SRs received in advance and during a BCDR testing event.

As a result of there being no specific SEC requirements in this area, the Proposer (Utilita Energy) is concerned that SRs may be lost and not processed. While User driven SRs may be logged through internal processes, Utilita Energy (the Proposer) noted that BCDR testing could result in customer driven SRs (e.g. Pre-payment top ups) being lost, which could in turn impact the customer experience and could result in the disconnection of supply of pre-payment customers.

Suppliers specialising in the use of the pre-payment mode functionality of Electricity Smart Meter and Gas Smart Meter, would particularly be susceptible to the disruptions caused by BCDR Testing.

3. Solution

3.1 What is the solution?

The Proposer seeks to amend SEC Section H10.11 in order to limit User impacting disruptions during BCDR testing, new clauses would be added to require the DCC to retain SRs received during the BCDR testing and process them appropriately for the completion of any BCDR testing.

3.2 Draft proposed legal text

The Proposer suggests adding the following two new clauses into SEC Section H10.11:

> c) cause as minimal disruption to Services as practicable when testing the operation of its Business Continuity and Disaster Recovery arrangements; and
>
> d) queue any Service Requests received during the Business Continuity and Disaster Recovery arrangements test which cannot be processed on demand and process those queued Service Requests as soon as practicable.

3.3 Requested Implementation

The Proposer requested that this modification be implemented as soon as possible and has suggested June 2017 for implementation subject to no DCC system impacts. As SECAS expects SECMP0029 will impact the DCC's systems, subject to the necessary DCC and/or User lead time to implement the modification, it is expected that the earliest implementation date would be the November 2018 release. The Working Group will consider this implementation date when recommending an implementation approach as part of the development of the Modification Proposal during the Refinement Process.

3.4 Views against SEC Objectives

The table below highlights the Proposer's views on how this Modification Proposal would better facilitate the achievement of the applicable SEC objectives.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
(a) To facilitate the efficient provision, installation, and operation, as well as interoperability of Smart Metering Systems at Energy Consumers' premises within Great Britain.	The Proposer believes that SECMP0029 will minimise disruption to Users during any BCDR testing.
(c) To facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems.	The Proposer believes that SECMP0029 helps ensure supply for pre-payment customers. This modification will reduce impacts during BCDR testing.

4. Potential Impacts

The following section sets out the initial assessment of the likely impacts arising from SECMP0029. Additional impacts may be identified by the Working Group during the Refinement Process.

<table>
<tr><th colspan="2">Potential Impacts of SECMP0029</th></tr>
<tr><td colspan="2">Smart Energy Code Parties</td></tr>
<tr><td>Suppliers</td><td>No impacts have been identified at this stage.</td></tr>
<tr><td>Networks</td><td>No impacts have been identified at this stage.</td></tr>
<tr><td>DCC</td><td>DCC will be impacted as the new obligations would impact how SRs are managed during BCDR testing.</td></tr>
<tr><td>Other Users</td><td>No impacts have been identified at this stage.</td></tr>
<tr><td colspan="2">Systems</td></tr>
<tr><td>DCC Systems</td><td>No specific impacts on the DCC Systems have been identified at this stage. The proposed modification will need to undergo analysis by the DCC to ascertain any system impacts.</td></tr>
<tr><td>User Systems</td><td rowspan="3">No impacts have been identified at this stage.</td></tr>
<tr><td>Smart Metering Systems</td></tr>
<tr><td>Other</td></tr>
<tr><td colspan="2">SEC and Subsidiary Documents</td></tr>
<tr><td>SEC Sections</td><td>SEC Section H10.11 “Testing the Business Continuity and Disaster Recovery Procedure” will be impacted and amended.</td></tr>
<tr><td>Subsidiary Documents</td><td>No impacts have been identified at this stage.</td></tr>
<tr><td colspan="2">Other Industry Codes and Documents</td></tr>
<tr><td colspan="2">No impacts have been identified at this stage.</td></tr>
<tr><td colspan="2">Greenhouse gas emissions</td></tr>
<tr><td colspan="2">No impacts have been identified at this stage.</td></tr>
<tr><td colspan="2">Impact on Consumers</td></tr>
<tr><td colspan="2">There are no identified direct impacts on Consumers. However, the proposed modification may reduce the impact of any DCC BCDR testing on the Consumer experience.</td></tr>
</table>

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5. Proposed Progression

5.1 Modification Path and the need for refinement

The Proposer proposed that SECMP0029 is progressed as Path 3 Self-Governance modification. The Panel decided to progress the modification as a Path 2 Authority Determined modification.

Due to the proposed changes to DCC, SECAS recommend this Modification Proposal go through the Refinement Process pursuant to SEC Section D3.9(c). This would allow the modification to be comprehensively developed by a Working Group before going to the Modification Report Consultation.

5.2 Indicative Progression Timetable

The following is a high level indicative progression timetable. The detail in this plan is subject to change, however, changes to the overall timetable are subject to a Panel review.

Modification Timetable	
Stage	Date
Modification Proposal Raised	19th December 2016
Panel initial consideration of the Modification Proposal	13th January 2017
Refinement Process	January 2017 – July 2017
Modification Report to Panel	August 2017
Change Board vote	October 2017
Authority Decision	N/A
Implementation	November 2018 (earliest potential implementation date based on DCC System impacts).

5.3 Working Group

The Working Group should be made up of existing Working Group Members who have previously considered Modification Proposals that have an impact on DCC Services and activities, supplemented by other interest SEC Parties.

5.4 Working Group Terms of Reference

A complete Terms of Reference for this Working Group can be found in **Attachment B**.

SECAS also recommends that the supplementary matters provided in the below table are considered by the Working Group.

Working Group Terms of Reference – supplementary matters to consider
Are there any impacts on the BCDR Procedure as a result of this Modification Proposal, and if so, what are they?

6. SEC Panel Decisions

The SEC Panel:

- **AGREED** for SECMP0029 to progress to the Refinement Process;
- **AGREED** the progression path (Path 2 – Authority Determined)[1], and the progression timetable as outlined in this IMR;
- **AGREED** the Working Group Terms of Reference and supplementary matters for consideration provided as **Attachment B** and in section 5.4 respectively.

7. Further Information

More information is available in:

- **Attachment A**: SECMP0029 Modification Proposal Form.

For further information, please see the Modification Register page of the SEC website or contact SECAS at secas@gemserv.com.

[1] Noting the proposed progression path was Path 3 Self-Governance

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Appendix 1 – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
DCC	Data and Communications Company	
	DCC Alert	Alert generated in the DCC Total System which is to be sent to a relevant User(s) depending on the alert
DUIS	DCC User Interface Specification	The document sets out mechanisms, formats, protocols, and other technical details necessary for Users to send and receive communications to and from the DCC
	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	Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0). The SEC Objectives are those objectives that the SEC has been designed to achieve.
	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).
	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)
	Party Category	Means one of the following categories: (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; or (e) the Other Sec Parties collectively. (Section A1, SEC Stage 3.0).
SR	Service Requests	A command issued by a DCC User to a device or the DCC.