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What stage is this document in the process?

Stage 01: Modification Proposal

01	Modification Proposal
02	Initial Modification Report
03	Draft Modification Report
04	Final Modification Report

SECMCP0029:

Business Continuity and Disaster Recovery Testing Amendments

Amend the DCC obligations on the Business Continuity and Disaster Recovery to ensure that Service Requests are processed as soon as possible to reduce customer impacts.



The Proposer recommends that this Modification Proposal should be:

- progressed as a Path 3: Self-Governance Modification
- progressed through the Refinement Process



Potential Impact on:

DCC, SEC Parties

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MODIFICATION PROPOSAL FORM V1.0

1. Proposer's Contact Details

Details of Proposer

Name:	Andy Knowles
Organisation:	Utilita Energy
Contact Number:	07392 197 760
Email Address:	andyknowles@utilita.co.uk

Representative as Point of Contact

Andy Knowles
Utilita Energy
07392 197 760
andyknowles@utilita.co.uk

Details of Representative's Alternate

Name:	Louise Porter
Organisation:	Utilita Energy
Contact Number:	01962 891182
Email Address:	louiseporter@utilita.co.uk

2. Modification Proposal Details

Mod Submission Date:	16.12.2016
Title of Mod Proposal:	Business Continuity and Disaster Recovery Testing Amendments
Description in Detail of the Proposed Modification:	DCC are not required to retain all Service Requests during tests of the BCDR. This could result in lost customer top ups which would impact the customer experience and be detrimental to the customer if they were to go off supply. This modification seeks to ensure that DCC is required to retain such Service Requests and process them appropriately to ensure that customers do not suffer unnecessary detriment. The SEC and DCC arrangements were primarily drafted to address credit customers. This is an issue which would have a much more immediate impact on prepayment customers; the current drafting does not recognise this unfair and adverse impact.

3. Path Type and Urgency Recommendation

Proposer's recommendations on Path Type (delete as appropriate)

Path 3

Statement for recommended Path Type:

This modification has potential benefits to customers by ensuring that any Service Request is processed as soon as practicable however this Modification Proposal is intended to better facilitate the operation of the industry and therefore we do not consider the Modification Proposal requires Authority consent.

Statement of whether Proposal is intended to be Fast-Track Modification (only Panel may raise this type of modification):

No

Is the Proposal Urgent? (delete as appropriate)

No

Statement of whether Proposal should be treated as an Urgent Proposal:

No

4. Modification Impact Assessment

4.1 SEC Objectives

Facilitation of SEC Objectives	Tick
General SEC Objectives (C1.1)	
(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;	☒
(b) the second General SEC Objective is to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence;	☐
(c) the third General SEC Objective is 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;	☒
(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;	☐
(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;	☐
(f) the sixth General SEC Objective is to ensure the protection of Data and the security of Data and Systems in the operation of this Code;	☐
(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.	☐
(h) the eighth General SEC Objective is to facilitate the establishment and operation of the Alt HAN Arrangements.	☐
Transition Objective (X1.2)	
X1.2 The objective to be achieved pursuant to Section X: Transition is the efficient, economical, co-ordinated, timely, and secure process of transition to the Completion of Implementation.	☐

Charging Objectives (C1.3) (in respect of the Charging Methodology)	
C1.4 The First Relevant Policy Objective: (a) applies in relation to Smart Metering Systems installed (or to be installed) at Domestic Premises; and (b) requires the Charging Methodology to ensure that Charges (other than Charges for Elective Communication Services) in respect of such Smart Metering Systems do not distinguish (whether directly or indirectly) between Energy Consumers at Domestic Premises in different parts of Great Britain.	☐
C1.5 The Second Relevant Policy Objective applies in relation to SMETS1 Meters. The Second Relevant Policy Objective is that, subject to compliance with the First Relevant Policy Objective, the Charging Methodology must (other than in respect of Elective Communication Services) (in each of the following cases, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology): (a) result in Charges that are the same for SMETS1 Meters as they are for Smart Metering Systems, save that no Charges for Communications Hub Services will apply to SMETS1 Meters; (b) notwithstanding (a) above (where the Costs of Communications for a SMETS1 Meter exceeds the Costs of Communications for a Smart Metering System, and where an Original Supplier for the Energy Supplier Contract relating to that SMETS1 Meter is (and has at all times since the adoption of the Energy Supplier Contract been) a supplier of electricity and/or gas to the premises at which that SMETS1 Meter is installed), result in Charges that ensure that the excess Costs of Communications are recovered from the Original Supplier from time to time (in addition to the Charges referred to in (a) above), and, for the purposes of this Section C1.5, the terms "SMETS1 Meters", "Costs of Communications", "Original Supplier" and "Energy Supplier Contract" shall have the meaning given to those terms in the DCC Licence.	☐
C1.6 The Third Relevant Policy Objective is that, subject to the Compliance with the First and Second Relevant Policy Objectives, the Charging Methodology must result in Charges that: a) facilitate effective competition in the Supply of Energy (or its use) under the Electricity Act and the Gas Act; b) do not restrict, distort, or prevent competition in Commercial Activities that are connected with the Supply of Energy under the Electricity Act and the Gas Act; c) do not deter the full and timely installation by Energy Suppliers of Smart Metering Systems at Energy Consumers' premises in accordance with their obligations under the Energy Supply Licence; and	☐

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(d) do not unduly discriminate in their application and are reflective of the costs incurred by the DCC, as far as is reasonably practicable in all of the circumstances of the case, having regard to the costs of implementing the Charging Methodology.

Statement of how the proposed variation would better facilitate the achievement of the SEC Objectives:

This modification will result in no lost Service Requests hence C1.1a and, more importantly, will result in no lost customer driven top up requests resulting in a better customer experience and energy management, hence C1.1c.

Under the current rules in the SEC, this process disadvantages one specific group of customers who may end up going off supply and/or result with payment issues with the bank. Although some issues will remain, should this Mod be implemented, this Mod will reduce those impacts.

4.2 Impacts

Statement of impact on Greenhouse Gas Emission:

None

Statement of impact on which parts of the SEC would need amending (e.g. proposed legal drafting):

The Modification Proposal seeks to introduce new clauses into SEC Section H10.11. The proposed initial wording is set out below:

The DCC shall:

- (a) from time to time, and at least once each year, carry out a test of the operation of its disaster recovery and business continuity arrangements in order to assess whether the Business Continuity and Disaster Recovery Procedure remains suitable for achieving the objectives described at Section H10.9; and
- (b) following any such test, report to the Panel and the Authority on the outcome of the test, and on any proposals made by the DCC in relation to the Business Continuity and Disaster Recovery Procedure having regard to that outcome.
- (c) Cause as minimal disruption to Services as practicable when testing the operation of its Business Continuity and Disaster Recovery arrangements.
- (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.

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Statement of impact on likely changes to other Energy Codes:

None

Statement of impact on likely Party Categories:

Large Supplier Parties	☒	Small Supplier Parties	☒
Electricity Network Parties	☐	Gas Network Parties	☐
Other SEC Parties	☐		

Statement of impact on Consumers:

The management of their energy will not be disrupted but top up requests failing to be queue and processed. This also extends to other Critical Messages which could impact a customer such as tariff updates.

Failed transactions may result in customers repeating payments causing banking issues or phoning call centres which may increase queuing times as this outage will affect all customers trying to top up.

Statement of impact on Central Systems:

DCC Systems	☐	User Systems	☐
Smart Metering Systems and/or Communications Hubs	☐	Other (i.e. on Smart Metering Key Infrastructure, or security)	☐

We expect the DCC have designed and implementation a system capable of delivering the changes set out in this Mod as we would expect that disaster recovery features for major systems would include the safe maintenance of data sent to the organisation and rapid processing after the event.

If the DCC has not made such provision in the systems, we consider that this is an urgent matter requiring immediate rectification.

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5. Proposed Timetable

Proposed Timetable for Modification Proposal:

Implementation date: June 2017 subject to no DCC system impacts.

6. Additional Information

Additional information:

APPENDIX 1: Glossary of Terms

The table below illustrates useful definitions of the terms used in this form. If you require any further information please contact the [SECAS Helpdesk](#).

Term	Definition
DCC Systems	Means the Systems used by the DCC and/or the DCC Service Providers in relation to the Services and/or this Code (Section A1, SEC Stage 3.0). The Proposer may wish to consider anticipated impacts on the DCC Licensee's enterprise systems (e.g. billing) or the Data Service Provider or Communications Service Providers.
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).
Other Systems	Other systems identified in the section Statement of Impact on Central Systems. The Proposer may wish to consider Prepayment vendors, Electricity Central Online Enquire Service (ECOES), Single Centralised Online Gas Enquiry Service (SCOGES), BSC Settlement Systems, etc.
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)

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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).
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.
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). The Proposer may wish to consider Suppliers; Network Operators; Registration Data Providers; Other DCC Users (e.g. Authorised Third Parties / Switching Sites); Supplier Nominated Agents.