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Stage 02: Working Group Consultation Responses

SECMP0034 'Changes to the SEC Section D for DCC analysis provisions'

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 contains the collated responses to the SECMP0034 Working Group Consultation (WGC). The Working Group (WG) will review these responses and consider them as part of the solution development for this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Talia Addy on 020 7090 1010 or email SEC.Change@gemserv.com.

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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree that the proposed solution will better facilitate Sec objective (g) the efficient and transparent administration and implementation of the SEC. The modification process is a key part of the SEC which enables Parties to request changes that will improve the regulatory baseline – ensuring that these changes can be progressed on a timely basis and preventing the DCC to become a bottleneck in this process will improve the overall SEC arrangements.
Western Power Distribution	Network Party	Yes	I believe that the proposed solution better facilitates SEC Objective (g) by ensuring the efficient and transparent administration of the code by setting clear guidelines for the DCC analysis of modifications.
Npower Group PLC	Large Supplier	Yes	Npower is in full support of the Proposer's intention behind the modification, which is that the SEC should be amended to drive an improved service from the DCC, set out clear expectations and timescales for delivery and require the DCC to report upon the status of Preliminary Assessments (PAs) and Impact Assessments (IAs) to the SEC Panel.
E.ON Energy Solutions	Large Supplier	Yes	We believe that this modification will better facilitate the efficient and transparent administration and implementation of the Modification Process, and thereby meets objective G.

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ScottishPower Energy Retail Ltd.	Large Supplier	Yes	We believe SECMP0034 would, if implemented, better facilitate: SEC Objective (b), in that it will help the DCC to achieve the First of its Enduring General Objectives, which is to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code. SEC Objective (g), in that, if implemented, SECMP0034 would facilitate the efficient and transparent administration of the SEC Modification process.
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Question 2

Q2: Will your organisation be impacted due the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	No	We have not identified any direct impact, other than that we, in common with all other SEC Parties, will benefit from a more timely progression of modifications.
Western Power Distribution	Network Party	No	This modification will not directly impact our organisation's processes or systems, however, it will aid the modification process and timescales and this transparency will help our organisation.
Npower Group PLC	Large Supplier	Yes	We believe that by placing obligations onto the DCC for the timely completion of PAs and IAs, any delays to the modifications process can be minimised. The whole release pipeline will become clearer, meaning all parties have a better understanding of the change landscape; and therefore a better approach to release planning across all parties.
E.ON Energy Solutions	Large Supplier	Yes	We believe that the majority of DCC Users will benefit from the implementation of this Modification.
ScottishPower Energy Retail Ltd.	Large Supplier	No	No rationale provided.

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Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	No	We have not identified any direct costs that would result from this change – save that any increases in DCC costs will be borne by all Users.
Western Power Distribution	Network Party	No	No rationale provided.
Npower Group PLC	Large Supplier	Neutral	We do not foresee our organisation incurring any costs as a result of this modification at this time.
E.ON Energy Solutions	Large Supplier	Yes	The implementation cost and the potential increase in the cost of Preliminary Assessments (PAs) and Impact Assessments (IAs). However we would note that R3.0 will be well underway by the time R2.0 goes live, and we do not therefore expect the potential increase in these costs to materialise where this modification is implemented post R2.0 live. In addition we believe that the benefits of this modification outweigh the potential risk of increased costs for PAs and IAs.
ScottishPower Energy Retail Ltd.	Large Supplier	No	No rationale provided.

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Question 4

Q4: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0034 should be approved?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	We agree that SECMP0034 should be approved – the benefits of a more rigorous modification process should far outweigh any increase in DCC costs that result from the proposed timescales.
Western Power Distribution	Network Party	Yes	This modification has reasonable costs and will help provide clearly defined processes and timescales for modifications, as well as a defined process for the DCC to report and advise when there is a delay to the progression of a modification.
Npower Group PLC	Large Supplier	Yes	No further comments at this time.
E.ON Energy Solutions	Large Supplier	Yes	As above.
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	No rationale provided.

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Question 5

Q5: Do you believe that the draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	While we agree that the draft legal text changes deliver the intention of the modification we do have some comments on the wording – we would also have welcomed a change marked version of Section D for this review rather than trying to work out how the changes provide fit into this section. Our comments are: Section A: DCC Areas of Analysis - we would suggest defining this term as 'DCC Area of Analysis' the subsequent use of Areas can be inferred from this definition – otherwise you get anomalies like the reference to 'a DCC Areas of Analysis@ which confuses the singular and the plural. D6.9 – It is not clear why the term 'from time' has been added, this actually makes the requirement less clear. D6.10C – 'from the then current' should read 'from the current'. D6.10D – 'from the then current' should read 'from the current'. D11.1 – we think the wording of this section could be clearer – for example 'The DCC shall report to the Panel each month both on the status of all ongoing DCC Assessments and DCC Urgent Assessments, as well as on all DCC Assessments and DCC Urgent Assessments that have been completed since the last such report.' D11.3 – we are not sure that it is appropriate to have the Target Service Level and the Minimum Service Level be the same – this is not the case for any existing Code performance

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			Measures. It might be that the Target should be 100% but the minimum should be slightly lower – say 95%.
Western Power Distribution	Network Party	Yes	The draft legal text delivers the intention of the modification, however D6.10D states 'Working Group does not to agree' and should read 'Working Group does not agree'.
Npower Group PLC	Large Supplier	No/Partially	We would like to suggest the following changes / amendments to the draft legal text, ☐ Attachment B (Legal Drafting) – DCC Impact Assessment definition should state “...in respect of a DCC Area of Analysis” not “... in respect of a DCC Areas of Analysis...”. ☐ Attachment B (Legal Drafting) – DCC Preliminary Assessment definition – see comment above, same applies. ☐ Attachment B (Legal Drafting) – The proposed definition of “DCC Preliminary Assessment” is “ (a) a preliminary assessment by the DCC.....”. This is a rather circular definition and does not answer the question as to what should be included by the DCC within a preliminary assessment as opposed to what should be done for an Impact Assessment. More clarity (perhaps a checklist of activities that should be included in both) would be helpful. ☐ Attachment B (Legal Drafting) – We believe that it is positive that a new Code Performance Measure relating to PAs and IAs is being proposed as part of this Modification. However, in order to be effective there needs to be some “teeth/penalties” behind the performance measure. We believe that without any penalties being in place, the new Performance Measure is unlikely to have any effect which may result in the

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			DCC continuing with their current patterns of behaviour. □ Attachment B (Legal Drafting) – Clause D6.9; Please consider reviewing the wording of this clause because it is not clear and concise. □ Attachment B (Legal Drafting) – Clause D6.10; Could there be an SLA added for SECAS in order to obtain the additional information within a certain timeframe or, at least to quote “within a reasonable timeframe”? □ Attachment B (Legal Drafting) – Clause D6.10A; May we suggest to insert the word “such” after “receiving” □ Attachment B (Legal Drafting) – Clause D6.10C; May we suggest to insert the word “its” before “reasons” in the second sentence, and the word “shall” before “propose” in the second sentence. □ Attachment B (Legal Drafting) – Clause D6.10D; The drafting includes a superfluous “to” in the first sentence which should be deleted. □ Attachment B (Legal Drafting) – Clause D11.2 - This clause introduces new obligations upon the DCC to report to the SEC Panel however the earlier clauses are proposing new obligations be implemented requiring the DCC to submit requests for extensions to the Working Group. Is there potential for some overlap/duplication here between WG activity and SEC Panel activity?
E.ON Energy Solutions	Large Supplier	No	We have the following comments with regard to the legal text provided, and have highlighted text in red to indicate a change (movement of, or otherwise amended, text).

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			DCC Preliminary Assessment in the current legal text means “a preliminary assessment”; it is our view that “DCC Preliminary Assessment” should be defined in such a manner that it is not in and of itself, such as is given in 1.1 of the Solution Design Specifications. D3.13 we believe that to capture the intent of the proposal as given in the DMR, this ought to be written “In determining or amending a timetable under Sections D3.10 and D3.11, the Panel may specify a time period for delivery of a DCC Assessment that differs from the standard time period set out in Section D6.10B (Analysis by the DCC). Without limitation, the Panel may specify a different time period in respect of Urgent DCC Assessments, such a time period shall be determined by Panel at the same point in time as the Urgency status for the proposal, or at a later point in time such that it follows an application for amendment from the DCC.” D6.8 we believe this ought to state Section D6.9 (a), (b), (c) and (d), opposed to (b), (c) (d) and (e)? D6.9 we believe that for readability this statement is better written as follows: “In considering the matters referred to in Section D6.8(d) and (e), each Working Group for a Modification Proposal shall consider whether one or more DCC Assessments should be undertaken in respect of the Modification Proposal. At the request of a Working Group for a Modification Proposal, the DCC shall prepare a DCC Preliminary Assessment and/or a DCC Impact Assessment for one or more of the following areas of analysis, in whole or in part, as determined by the Working Group: (a) whether the DCC should, as part of the proposal's implementation (should that proposal be approved), be required to undertake testing of the DCC Total System and/or provide testing services; and (if so) the DCC's proposals for the scope, phases, timetable and participants for such testing.
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			To the extent it is not yet reasonably practicable to determine such matters, DCC should set out its proposals for the process pursuant to which such matters should be developed; ” We would note, the DMR gives that the DCC shall set out the “timescales for making the required changes” where the legal text reflects only that DCC will provide a proposal for the timetable of testing. We are happy with the legal text given the implementation date is a requirement for the Proposer, Working Group or Panel to determine rather than the Service Provider, however we feel that this ought to be made explicit within the Modification Report in order that there is no misconception concerning who is determining the timescales for the required changes. It might also be beneficial to add to D6.9 that the timetable proposed for testing needs to adhere to the implementation date of the Modification Proposal. D6.10B we believe this read better if written as follows: “The DCC shall complete each DCC Assessment and present it to the Code Administrator within 15 Working Days (for DCC Preliminary Assessments) or 40 Working Days (for DCC Impact Assessments) measured in each case from the point of acceptance by the DCC under Section D6.10 or D6.10A; subject to amendments to the timetable made by the Panel under Section D3.11 (Timetable) or agreed by the relevant Working Group in accordance with Section D6.10C. ” D6.10C The following passage can be read as either precluding the Working Group from agreement, or as allowing the Working Group the option of a refusal “The Working Group may not agree an amendment which would require a deviation from the then current timetable applying to the Modification Proposal under Sections D3.10 and D3.11 (Timetable). ”. We consider that this ought to be written as follows in accordance with the intent of the proposal as given in 4.4 of the Solution Design Specifications: “The Working Group may not agree an amendment which would require a deviation from the then current timetable applying to the Modification Proposal under
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			Sections D3.10 and D3.11 (Timetable), any such requested amendment shall be submitted by the DCC to the Panel." D6.10D we believe this ought to be written "Where the DCC wishes to amend a DCC Assessment timescale which requires a deviation from the then current timetable applying to the Modification Proposal under Sections D3.10 and D3.11 (Timetable) or where the relevant Working Group does not agree to an amendment under Section D6.10C, then the DCC may apply to the Panel to request an amendment to the DCC Assessment timescale in accordance with Section D3.11 (Timetable). The DCC shall give reasons in respect of any such request, which must also be notified to the Working Group so that members of the Working Group can also make submissions to the Panel if they wish to do so." D11.1 we believe that Urgent DCC Assessments need to be included here in accordance with 5.2 of the Solution Design Specifications. In addition we believe that the last sentence of this passage needs to be refined to include requirement 5.5 of the Solution Design Specifications. D11.3 we believe 9 ought to be written as follows "Of the DCC Assessments required to be completed during the Performance Measurement Period, the % that were completed within the required timescales (ignoring amendments to such timescales made at the request of the DCC)." We would also note that the 'by majority' agreement requirements of the Solution Design Specifications for both Working Group and Panel are missing from the relevant legal text provided, as are the notification ('notify'/'inform') requirements of the DCC.
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	No rationale provided.

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Question 6

Q6: Do you agree with the recommended implementation date?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	Yes	While we would like these changes to be implemented as soon as possible we recognise that this is not likely to be possible until after the implementation of Release 2.
Western Power Distribution	Network Party	Yes	No rationale provided.
Npower Group PLC	Large Supplier	Yes	No further comments at this time.
E.ON Energy Solutions	Large Supplier	Yes	No rationale provided.
ScottishPower Energy Retail Ltd.	Large Supplier	Yes	No rationale provided.

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Question 7

Q7: Are there any alternative solutions that you believe have not been considered?

Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	No	While there are a number of different ways that the same outcome could be achieved we do not believe that any of them would achieve a better outcome than the proposed solution.
Western Power Distribution	Network Party	No	No rationale provided.
Npower Group PLC	Large Supplier	No	No rationale provided.
E.ON Energy Solutions	Large Supplier	No	No rationale provided.
ScottishPower Energy Retail Ltd.	Large Supplier	No	No rationale provided.

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Question 8

Q8: Do you have any further comments on SECMP0034?			
Party Name	Party Category	Yes/No	Comments
EDF Energy	Large Supplier	No	No further comments.
Western Power Distribution	Network Party	No	No further comments.
Npower Group PLC	Large Supplier	Yes	It is our position that the quality of work produced by the DCC should not be adversely affected as a result of this modification. We believe that quality assurance measures should be in place to ensure consistently high standards of work within the new timeframes. Within the consultation overview document, it states that "There are no impacts on SEC Parties associated with this Modification Proposal". We believe that this is incorrect because the DCC is a SEC Party and they will be impacted by this proposal as it will require them to make changes to their current process regarding PAs and IAs. This statement also contradicts the information contained in Attachment A (Draft Modification Report) which does acknowledge that the DCC (who are a SEC Party) will be impacted by this proposal. Questions: ☐ The consultation overview document and the DMR state that the total estimated implementation costs to deliver SEC Modification 34 are £3,000 in SEC Administration effort. Will the DCC not incur any costs in implementing this proposal?

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			□ Note that the SLAs that the DCC notified that they would work to in 2016 regarding PAs and IAs was 23 WD and 44 WDs respectively. This modification is proposing that these SLAs are revised to be 15 WDs and 40 WDs respectively. Whilst we support the proposal that the timescales for production of these documents should be reduced, we have seen evidence that DCC have consistently failed to meet the targets that they notified in 2016 (23 WDs and 44 WDs). Our question is what are the DCC proposing to change within their internal processes / contracts in order to achieve the revised SLAs that are being proposed and, what is the consequence to the DCC in the event of not meeting their response deadlines?
E.ON Energy Solutions	Large Supplier	No	No further comments.
ScottishPower Energy Retail Ltd.	Large Supplier	No	No further comments.

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