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## Stage 04: Modification Report Consultation Responses

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

What stage is this document in the process?

|      |                     |
|------|---------------------|
| 01   | Initial Assessment  |
| 02   | Refinement Process  |
| 03   | Modification Report |
| ▶ 04 | Decision            |

## About this document

This document contains the collated responses to the SECMP0034 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on 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](mailto:SEC.Change@gemserv.com).

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## About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0034.

The Change Board will consider these responses at its meeting on 21<sup>st</sup> March 2018, where it will determine whether SECMP0034 should be approved or rejected.

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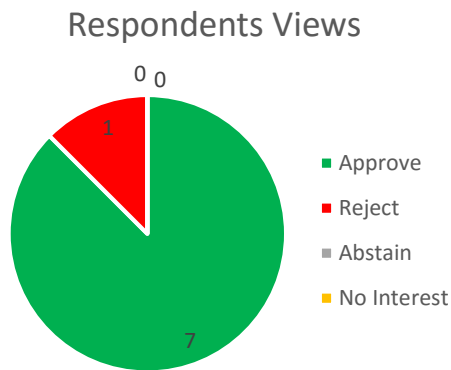
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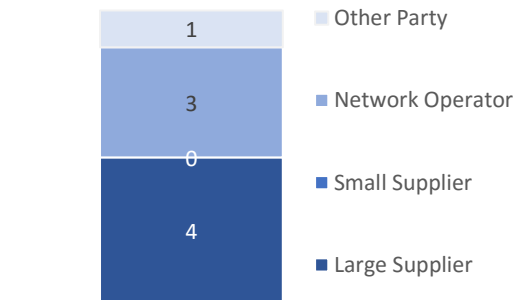
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## Summary of Responses

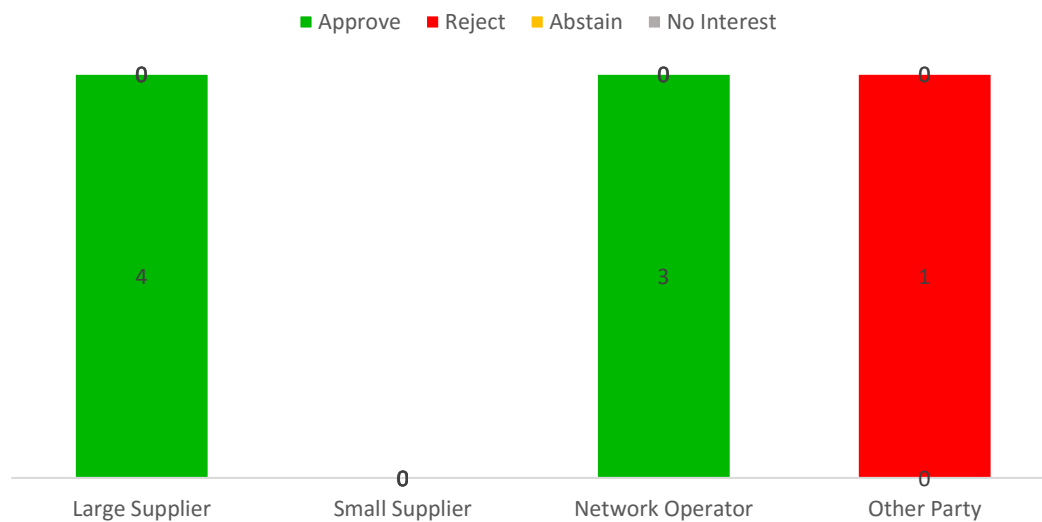
This section summarises the responses received to the SECMP0034 MRC.



### Number of Respondents (by Party Type)



### Views by Party Type



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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/ Neutral | Comments                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------------|------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.ON Energy Solutions          | Large Supplier   | Yes             | We believe this Modification better facilitates objectives G and B in so far as it will better facilitate the efficient and transparent administration and implementation of the Modification Process (objective G), and in doing so will better enable the DCC to meet their first general objective by ensuring the development of a System for the provision of Mandatory Business under the SEC (objective B). |
| Utilita Energy                 | Large Supplier   | Yes             | We believe this modification better facilitates SEC objective G through putting in place a faster and more efficient process for receiving DCC PAs and IAs as part of the progression of a SEC Modification.                                                                                                                                                                                                       |
| Electricity North West Limited | Network Operator | Yes             | The proposed solution better facilitates SEC Objective (g) as it seeks to improve the DCC PA and IA arrangements, allowing for more efficient management of DCC submission timescales, better ensuring the efficient progression of Modification Proposals.                                                                                                                                                        |
| Western Power Distribution     | Network Operator | Yes             | We feel this modification better facilitates SEC Objective (g) by ensuring more efficient and transparent administration of the code. This modification will also help identify any weaknesses in the DCC assessment process.                                                                                                                                                                                      |

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|------------|----------------|-----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SSE        | Large Supplier | Yes | The proposed solution should better facilitate SEC Objective G as it will make the process of code modifications more efficient.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| EDF Energy | Large Supplier | Yes | We believe that the proposed solution better facilitates SEC Objective (g) as setting clear timescales for the progression of PAs and IAs will improve the timeliness and transparency of the SEC Modifications process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DCC        | Other Party    | No  | <p><i>(g) the seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code;</i></p> <p>The Objective cited as being better facilitated by this modification relates to the 'efficient' functioning of the code. DCC does not believe that efficiency of the code is increased, only that the modification places obligations on DCC to define (with the aim of reducing) the timing of modification delivery. Costs and other resources required to meet these deadlines have not been adequately investigated.</p> <p>DCC is also concerned that the modification may adversely impact on the second General SEC Objective.</p> <p><i>(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;</i></p> <p>Applying uniform timescales for the delivery of impact assessments takes no account of the vastly varying size and scope of modifications, and it is DCC's view that this requires further consideration.</p> <p>As a comparison, DCC considers that it is absolutely correct that governance procedures around the development of modifications are not bound (for example, to two workgroup</p> |

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|                                            |                  |     | <p>meetings per modification), and that in general, standard timescales for analysis are over prescriptive and contrary to the SEC's efficient operation.</p> <p>In addition we consider that changes to Section D to amend the process of modification proposal development have the capability to fundamentally alter the processes contained within this modification. Changes to implement pre-modification, prioritisation and early, 'minded-to' support for modifications could be amended to incorporate faster impact assessment turnaround and speed up the overall development of modifications.</p> |
| Scottish and Southern Electricity Networks | Network Operator | Yes | SSEN believes with the working group that General SEC Objective (g) is facilitated by this proposed modification.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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## Question 2

**Q2: 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------|----------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.ON Energy Solutions | Large Supplier | Yes    | <p>We would note that the potential benefits to be drawn from this modification will likely be undermined by the proposed Release Management Policies (RMPs): the benefit in a timely turn-around is that the analysis is relevant to the current climate and will not need to be redone. Where DCC take 13 months following the approval of the Modification to implement the solution, their analysis may well be required to be redone in light of any relevant changes made within that 13+ months (analysis will be undertaken x months prior to Mod approval). Should the cost of these assessments increase as a result of this Modification, and need to be redone as a consequence of the RMPs we may be burdened by additional, unintended costs.</p> <p>We have rationalised consideration of this point with our belief that the cost of these assessments should not reasonably be expected to increase, because the implementation date of this Modification is post R2.0. As such we believe that this modification should be approved.</p> |
| Utilita Energy        | Large Supplier | Yes    | <p>We do not foresee any direct impacts or costs to our organisation and believe the solution can only improve the current elongated process of gaining costs and insight from the DCC into system impacts as part of the progression of SEC modifications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|--------------------------------|------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Electricity North West Limited | Network Operator | Yes | It will drive improved service from the DCC as it will set out clear expectations and timescales for delivery which would benefit any Electricity Network Party raised Modification.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Western Power Distribution     | Network Operator | Yes | The costs of implementing this modification are minimal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| SSE                            | Large Supplier   | Yes | As there are no direct impacts or costs for us to consider, SSE supports the approval of this proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| EDF Energy                     | Large Supplier   | Yes | We believe that the costs are far outweighed by the benefits to be gained. We note the concern from DCC that costs could be significantly increased as a result of this Modification – our view of the intent of SECMP0034 is that it should not increase the amount of effort required by DCC to undertake PAs and IAs, but provide more rigour to how those assessments are progressed which is currently entirely unclear.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| DCC                            | Other Party      | No  | <p>Our concerns relate to the premise implied in this modification proposal that every SEC modification proposal is equal. Whilst the Business Rules provide for the ability to request differing timelines there is no requirement for these to be considered, or accepted. If a request for extension is not granted the only alternative for DCC to deliver an assessment within a set time scale would be to deploy short term resource. It is also DCC's view that the speed at which an impact assessment is returned (IA or PA), may impact on its accuracy.</p> <p>As an example, a recent modification (SECMP42) sought PAs from a number of DCC Service Providers. Whilst all PAs were returned on time, the solution proposed by 2 SPs relied on a third SP. In light of this dependency, the third SP had to approve the solution proposed by the other SPs, essentially performing another round of assessment. Ultimately, this</p> |

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|                                            |                  |     | <p>flexibility produced better, more robust solutions and would not be possible under this system.</p> <p>This lack of differentiation will require DCC and its SPs to temporarily ramp up capacity to deliver large and complex changes in the same timescales as very small changes.</p> <p>The impacts and costs to DCC will be socialised via the Charging Methodology. We do not feel increased costs are economic nor efficient and these costs could ultimately pose a potential barrier to market entry, thus stifling competition.</p>  |
| Scottish and Southern Electricity Networks | Network Operator | Yes | <p>Implementation of this change will mean that the DCC has to work to clearly defined target times associated with the delivery of assessments for proposed modifications.</p> <p>To date a number of proposed modifications have been delayed due to the time it has taken for the DCC to undertake assessments associated with change. This proposal clearly sets the future timescales that the DCC needs to achieve and as a consequence reduces potential delays associated with the progression of individual modification proposals.</p> |

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### Question 3

**Q3: Do you agreed that draft legal text changes deliver the intention of the modification ?**

| Party Name            | Party Category | Yes/No | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------|----------------|--------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.ON Energy Solutions | Large Supplier | No     | <p>We have the following comments with regard to the proposed legal text:</p> <p>DCC Impact Assessment and DCC Preliminary Assessment – we believe ‘Analysis’ should be written ‘analysis’ because this is not a defined term;</p> <p>DCC Preliminary Assessment – 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, and to reflect the intent of 1.1 of the Solution Design Specifications;</p> <p>D6.9 – we believe this would be more concise and would better capture the intent of the Modification if it were written “the DCC shall prepare a DCC Assessment and/or an Urgent DCC Assessment for”;</p> <p>D6.9 (a) – we believe It would be beneficial to add that the timetable proposed by the DCC will adhere to the implementation date of the Modification Proposal, to meet the scope and intent of the Modification;</p> <p>D6.10 – we believe that clarification is required with regard to the 5WDs for the Code Administrator; the current drafting does not allow us to understand the activity that necessitates the commencement of the 5WDs;</p> <p>D6.10A – we believe that ‘still more additional’ ought to be written ‘still additional’ to avoid tautology;</p> |

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|----------------|----------------|-----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                |                |     | <p>D6.10 B; D6.10 C; D6.11; D7.3; D11 – we believe that the arrangements for Urgent DCC Assessments need to be given consideration within these clauses;</p> <p>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 which gives that the Panel will provide the DCC with notice of one month for additional information. The current legal drafting gives that the DCC will provide in their monthly report, any information requested since the last report; this could mean that they do not receive the full one month notice as is required in the Solution Design Specifications.</p> <p>D11.3 – we believe 9 ought to be written as follows “<b>Of the</b> DCC Assessments required to be completed during the Performance Measurement Period, <b>the % that were</b> completed within the required timescales (ignoring amendments to such timescales made at the request of the DCC).” – If the other Code Performance Measures also request a numerical value but provide a field for a percentage value, we would urge SECAS to consider a housekeeping change to correct this issue.</p> |
| Utilita Energy | Large Supplier | Yes | <p>Although we agree with the intention of this modification we have several comments on the proposed drafting:</p> <p><i>D.3.11 – We would like to understand how SECAS will implement this process in practice as this step could result in significant delays to receiving impact assessments where there is a long lead time for a Working Group meeting or Panel meeting. For example, what would happen if the Working Group cannot make a decision or does not agree an extension and the request is subsequently taken to Panel, is the decision taken to the next available Panel meeting (could be up to 4</i></p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|                                |                  |     | <i>weeks away) or will this be considered ex-committee? We are also conscious that Working Group meetings often take weeks/months to be convened which could lead to months before a Working Group meets to decide if the DCC should be allowed to have a different timetable.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| Electricity North West Limited | Network Operator | Yes | The draft legal text changes deliver the intention of the Modification Proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Western Power Distribution     | Network Operator | No  | <p>The Solution Design Document details additional DCC reporting requirements (Requirement 5) and this includes both Urgent DCC Assessments and DCC Assessments. However, the legal text D7.3 (v) and D11 state, "DCC Assessments" and not "Urgent DCC Assessments". Due to 'DCC Assessments' being a defined term, 'Urgent DCC Assessments' also needs to be stated:</p> <p><b>Content of the Modification Report</b></p> <p>D7.3 The Modification Report for each Modification Proposal shall: ...</p> <p>(i) where the Modification Proposal was subject to the Refinement Process prior to the Report Phase:</p> <p>...</p> <p>(v) include a summary <u>and copies</u> of any and all <u>DCC Assessments</u> and <u>Urgent DCC Assessments analysis</u> provided by the DCC pursuant to Section D6.9 (Analysis by the DCC).</p> <p><b>D11 DCC Assessment Reporting</b></p> |

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|  |  |  | <p><b>Reporting on DCC Assessments and Urgent DCC Assessments</b></p> <p>D11.1 The DCC shall report to the Panel each month on the status of all DCC Assessments and Urgent DCC Assessments which are ongoing or that have been completed since the last such report. The DCC shall include in each such report any additional details reasonably requested by the Panel since the last such report.</p> <p>D11.2 Such reports shall include details of whether the required timescales for completion of the DCC Assessments and Urgent DCC Assessments are likely to be (or have been) met. Where there is any delay, the DCC shall set out a clear explanation of the reasons for such delay, the likely delivery timescales, and the actions being taken by the DCC to minimise the delay.</p> <p><b>Code Performance Measures</b></p> <p>D11.3 Each of the following performance measures constitute a Code Performance Measure (to which the following Target Service Level and Minimum Service Level will apply, measured over the following Performance Measurement Period):</p> |
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|            |                |     | <b>No. Code Performance Measure</b><br><br><b>Performance Measure</b><br><br><b>Target Service Level</b><br><br><b>Minimum Service Level</b>                                                                                                                                                                                                                                                                         |
|------------|----------------|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            |                |     | 9 Out of the DCC Assessments and Urgent DCC Assessments required to be completed during the Performance Measurement Period, how many were completed within the required timescales.                                                                                                                                                                                                                                  |
| SSE        | Large Supplier | Yes | -                                                                                                                                                                                                                                                                                                                                                                                                                    |
| EDF Energy | Large Supplier | Yes | <p>We agree that the draft legal text changes deliver the intention of the modification.</p> <p>We would however question the value of the inclusion of the additional Code Performance Measure in the legal text. As noted in the FMR there are no consequences as a result of DCC failing to meet their obligations to deliver Pas and IAS within the relevant service levels. It is not clear what value this</p> |

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|                                            |                  |     | <p>reporting requirement adds over and above the DCC Assessment Reporting obligations detailed in section D11 of the draft legal text.</p> <p>It is also noted in the FMR that ‘there will be provisions for revised timescales meaning the DCC should be able to deliver 100% of its DCC assessments’. If this is the case, and performance is likely to be reported at 100% all the time because the timescales can be amended, this further brings into question the value of this Code Performance Measure.</p> <p>While retaining the new Code Performance Measure within the legal text will not have a detrimental impact, we believe it adds no value and should be removed.</p>      |
| DCC                                        | Other Party      | Yes | <p>DCC notes that the changes to the legal text currently include delivery of PAs and IAs as part of DCC’s SEC Code Performance Measures, and DCC will make efforts to deliver against it accordingly. However, if, as the was noted in the workgroup, these measurements could fall under DCC’s Operating Performance Regime DCC would need to take steps to ensure that these measures were met in all circumstances, which would incur corresponding cost. We perceive this poses a significant risk to industry if the legal text does not include counterbalancing protection to ensure that DCC and SPs are not required to process a very high number of PAs and IAs concurrently.</p> |
| Scottish and Southern Electricity Networks | Network Operator | Yes | Nothing further to add                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

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## Question 4

### Q4: Do you agree with the recommended implementation date?

| Party Name                     | Party Category   | Yes/No | Comments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------------------|------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.ON Energy Solutions          | Large Supplier   | Yes    | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Utilita Energy                 | Large Supplier   | Yes    | We are keen for this modification to be implemented as quickly as possible.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| Electricity North West Limited | Network Operator | Yes    | The implementation approach should allow for works already directed by the Secretary of State such as Smart Metering Equipment Technical Specifications (SMETS) 1 Enrolment & Adoption and Release 2.0 to go live prior to the implementation of SECMP0034 (or just after if there are any delays).                                                                                                                                                                                                                                                                                                                                                                             |
| Western Power Distribution     | Network Operator | Yes    | <p>We agree with the recommended implementation date as this modification will help with a more transparent assessment process.</p> <p>We acknowledge that DCC Release 2.0 should have gone live by this date. We also note the SMETS1 Enrolment and Adoption programme is lengthy and complex and therefore expect that due to the demand on the DCC, they might not be able to meet the new PA and IA timescales imposed by this modification immediately. However, as this modification clearly details a process for the DCC to follow to notify the Working Groups and the Panel when the target dates cannot be met, we think it should not be implemented any later.</p> |

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|--------------------------------------------|------------------|-----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SSE                                        | Large Supplier   | Yes | -                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| EDF Energy                                 | Large Supplier   | Yes | We believe that this change should be implemented as soon as possible, and agree that the 1st November is the earliest date that this Modification can be implemented.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| DCC                                        | Other Party      | No  | <p>The implementation date proposed is during the planned start of DCC's Initial Operating Capability for its SMETS1 Service. Notwithstanding the fundamental concerns DCC has with the implementation of this modification without counterbalancing provisions to ensure DCC is not subject to so many PAs and IAs that have not been forecast, and the impact this would have on DCC's ability to deliver its General Licence Objectives, DCC has previously stated that during this period DCC and its Service Providers will be operating to full capacity and the delivery of Preliminary and full Impact Assessments will require additional short term resources to process. DCC expects that these resources have significantly higher costs than those after this period.</p> <p>In addition we consider that accepting this change before being aware of the changes proposed within the Section D review has the potential to conflict and create unintended consequences and false constraints. In light of the acceptance of the Release Management Policies we are working to overhaul our commercial contracts to deliver fixed releases and secure fixed capacity for change.</p> |
| Scottish and Southern Electricity Networks | Network Operator | Yes | SSEN is supportive of the proposed implementation date.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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## Question 5

### Q5: Do you have any further comments on SECMP0034?

| Party Name                     | Party Category   | Yes/No | Comments                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------|------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| E.ON Energy Solutions          | Large Supplier   | No     | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| Utilita Energy                 | Large Supplier   | No     | Not at this stage.                                                                                                                                                                                                                                                                                                                                                                                     |
| Electricity North West Limited | Network Operator | No     | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| Western Power Distribution     | Network Operator | No     | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| SSE                            | Large Supplier   | No     | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| EDF Energy                     | Large Supplier   | No     | -                                                                                                                                                                                                                                                                                                                                                                                                      |
| DCC                            | Other Party      | Yes    | <p>DCC provided comments for the Final Modification Report concerning the implementation date which we do not consider have been taken into account.</p> <p>DCC supports the principles of this modification – to provide predictability in terms of assessment completion, and has made changes to its processes with SPs to react to modification requests with greater speed. Impact assessment</p> |

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|                                            |                  |     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------|------------------|-----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                            |                  |     | <p>delivery has, to date, been undertaken alongside DCC's Licence-derived delivery plans for the Secretary of State as part of the Smart Metering Implementation Programme. Whilst we regret the amount of time that some PAs and IAs took to produce we nevertheless believe the prioritisation of work was correct and the trade-offs on cost were economic and efficient. Furthermore, as this work completes, and as we instigate arrangements for SEC Releases in accordance with our and the Panel's Release Management Policies, we expect to be able to deliver impact assessments at greater speed with or without the introduction of this modification.</p> <p>DCC would recommend that the modification be amended to ensure that there are explicit clauses which protect SEC Parties from DCC having to incur cost inefficiently by reacting to un-forecasted requests for change. We recommend an implementation date of February 2019, following planned initial SMETS1 deployment as we feel this offers greatest value for money in terms of resource allocation.</p> |
| Scottish and Southern Electricity Networks | Network Operator | Yes | SSEN expects to see no increase in DCC charges due to the implementation of this proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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