



This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

What stage is this document in the process?

Stage 01: Initial Modification Report

SECMP0036: Single User ID for Users acting in one or more User Roles

This Modification proposes to enable a User to use the same User ID when operating in the roles of 'Import Supplier' and 'Gas Supplier'.

P3

The recommendation is that this Modification Proposal should:

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



Impact on:

- Suppliers
- Smart Energy Code (SEC)
- Data Communications Company (DCC)

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

Proposer:

Name Paul Saker
(EDF Energy)

Email:
paul.saker@edfenergy.com

Phone number:
07875110937

SECAS Contact:

Name: Talia Addy

Email:
SECAS@gemserv.com
Phone number:
0207 70907755

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 1 of 9

This document has a
Classification of **White**

© SECCo 2017

Content

1. Summary	3
2. What change?	4
3. Solution	5
4. Potential Impacts and Costs	6
5. Proposed Progression	7
6. SEC Panel Decisions	8
7. Further Information	8
8. Appendix A – Glossary and References	9

About this document

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

The Panel considered this IMR at its meeting on 9th June 2017.

This document has the following attachments:

- **Attachment A** – SECMP0036 Modification Proposal Form
- **Attachment B** – SECMP0036 Draft Legal Text
- **Attachment C** – SECMP0036 draft Modification Report
- **Attachment D** – SECMP0036 draft Modification Report Consultation response form

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 2 of 9

This document has a
Classification of **White**

© SECCo 2017

1. Summary

This section provides an overview of SECMP0036. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (Appendix A) of this document.

1.1 What is the problem?

The obligations relating to the use of User IDs are set out in SEC Section H. The current drafting of these obligations state that a Supplier wishing to act as a User in one or more User Roles will need to obtain separate User IDs for each Role. The only exception to this obligation is where a Supplier is operating as an Import Supplier, Export Supplier and a Gas Supplier.

In the scenario where a Supplier only operates as an Import Supplier and Gas Supplier (i.e. not an Export Supplier) the Supplier is obligated to have two User IDs, rather than a single ID.

1.2 Solution

This modification proposes to amend Section H1.5, to allow a Supplier Party to associate a single User ID with the User roles of Import Supplier and Gas Supplier.

No DCC system changes are involved in this change as the functionality for a single User ID to be associated with the User roles of Import Supplier and Gas Supplier is already available within the DCC Systems

1.3 Impacts and Costs

This modification will impact Supplier Parties (who wish to utilise the option the modification formally captures) and the SEC only. While the DCC is impacted, from a processing perspective, there are no associated DCC System impacts involved in the modification.

The costs to implement this change will be limited to the Code Administrator time and effort to make the necessary amendments to the SEC and release a new version to SEC Parties, as well as the publication of the new version on the SEC Website.

1.4 Implementation

As this Modification Proposal only involves changes to the SEC (Section H1.5), the implementation date of this modification is proposed as **Five Working Days (WD)** following the end of the 10 WD referral period, which commences following the Change Board vote (subject to the modification being progressed as a Path 3 'Self-governance' Modification Proposal).

1.5 Proposed progression

The Proposer and SECAS recommend that SECMP0036 is progressed as a Path 3 'Self-Governance' Modification Proposal, and that as the changes are fully defined and do not require Refinement, that SECMP0036 proceeds to Modification Report Consultation.

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 3 of 9

This document has a
Classification of **White**

© SECCo 2017

2. What change?

2.1 Background

The obligations relating to the use of User IDs are set out in SEC Section H. The current drafting of these obligations state that a Supplier wishing to act as a User in one or more User Roles will need to obtain separate User IDs for each Role. The only exception to this obligation is where a Supplier is operating as an Import Supplier, Export Supplier and a Gas Supplier.

In the scenario where a Supplier only operates as an Import Supplier and Gas Supplier (i.e. not an Export Supplier) the Supplier is obligated to have two User IDs rather than a single ID.

2.2 What is the issue?

EDF Energy has raised SECMP0036, as they believe that the current SEC drafting is overly restrictive as many Suppliers do not operate as an Export Supplier and therefore may be prevented from attaining the benefits of being able to use a single User ID. Requiring a Supplier to obtain two User IDs simply because they do not operate as an Export Supplier creates a dis-benefit under the SEC. Further, some Suppliers may wish to register as an Export Supplier simply so they can attain the benefits of a single User ID. Which will result in additional costs for conducting User Entry Process Testing even though they may not ever send service requests in that role in live Operations. We therefore propose to relax the current restriction around User IDs.

It is not clear to the Proposer why this restriction was implemented into the SEC. Following discussions, prior to the Modification Proposal being raised with the DCC, SECAS and BEIS, it has been clarified that it was not the intent of the SEC provisions in Section H1.5 to be this restrictive.

As part of these discussions, it has also been clarified with DCC that using a single User ID to operate in the User Roles of **Import Supplier and Gas Supplier** is technically feasible within their current design and would not result in any changes being required to the DCC Systems.

However, whilst it is possible within the DCC Systems to have a single User ID for the roles of Import Supplier and Gas Supplier, under the current obligations in the SEC, any User that chooses to associate a single User ID in this way is technically in breach of Section H1.5 as it is not currently a permissible option.

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 4 of 9

This document has a
Classification of **White**

© SECCo 2017

3. Solution

3.1 What's the solution?

SECMP0036 seeks to change to Section H1.5 to enable Suppliers to use a single User ID when operating in the role of **Import Supplier and Gas Supplier**.

This is in addition to the current provision whereby a User ID can be associated with individual User roles (either; Import Supplier, Export Supplier or Gas Supplier) or with a combination of the three roles of Import Supplier, Export Supplier and Gas Supplier.

Why have other combinations not been included?

During the discussions that led to this Modification Proposal being raised, consideration was given to whether other combinations could be associated with a single User ID. However during these initial discussions confirmation was received from the DCC that any other combination of User roles (other than Import Supplier and Gas Supplier) would involve changes to the DCC Systems, including access control changes. Therefore, for expediency these combinations have not been included as part of this change.

While the ability to associate a single User ID with either Import Supplier and Export Supplier or Export Supplier and Gas Supplier have not been included in this Modification Proposal, if another SEC Party believes there is benefit in taking these changes forward, a separate Modification Proposal may be raised, noting that such a change would have associated DCC System impacts.

3.2 Proposed draft legal text

The proposed legal drafting to deliver the SECMP0036 solution is in **Attachment B**.

3.3 Proposed Implementation approach

As this Modification Proposal seeks only to amend the SEC to allow a User ID to User role combination (that the DCC can already support) the following recommended implementation approach is proposed:

- **5 Working Days (WDs)** following the end of the 10 WD Self-governance referral window.

The implementation approach is subject to SECMP0036 being progressed as a Path 3 'Self-Governance' Modification Proposal. Further information on the proposed progression can be found in section 5.

3.4 Views against SEC Objectives

The table below highlights the Proposer's view on how this modification would better facilitate the achievement of the applicable SEC Objectives.

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
(g) To facilitate the efficient and transparent administration and implementation of this Code.	This Modification would better facilitate Objective (g) as it would enable additional Parties to be able to use a single User ID to more efficiently operate in multiple User Roles, and gain the associated operational and process efficiencies.

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 5 of 9

This document has a
Classification of **White**

© SECCo 2017

Proposers views against the SEC Objectives	
General SEC Objective	Proposer views
	The current obligation in the SEC is operationally unnecessary and overly restrictive, and may cause Suppliers to incur the costs of conducting User Entry Process Testing in the 'Export Supplier' User Role unnecessarily in order to attain the benefits of a single User ID.

4. Potential Impacts and Costs

4.1 Impacts

The following section sets out the initial assessment of the likely impacts arising from SECMP0036.

Potential Impacts of SECMP0036	
Smart Energy Code Parties	
Suppliers	This Modification Proposal will only impact Suppliers who choose to associate a single User ID with the roles of Import Supplier and Gas Supplier.
DCC	There are no anticipated impacts on these party categories by the implementation of this Modification Proposal.
Networks	
Other	
Systems	
DCC Systems	There is no anticipated impact on the DCC Systems associated with this Modification Proposal, as confirmation has been received from the DCC that its systems can already accommodate the association of a single User ID with the User roles of Import Supplier and Gas Supplier.
User Systems	There are no anticipated impacts on User Systems or Smart Metering Systems arising from this Modification Proposal.
Smart Metering Systems	
Other	
SEC and Subsidiary Documents	
SEC Sections	SEC Section H - DCC Services

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 6 of 9

This document has a
Classification of **White**

© SECCo 2017

Subsidiary Documents	No SEC Subsidiary Documents are impacted by this change.
Other Industry Codes and Documents	
There are no anticipated impacts on other industry codes and documents.	
Greenhouse gas emissions	
There are no impacts on greenhouse gas emissions arising from this modification.	
Impact on Consumers	
No impacts on Consumers have been identified	

4.2 Costs

The costs to implement this change will be limited to the Code Administrator time and effort for:

- making the necessary amendment to the SEC;
- releasing a new version of the SEC to SEC Parties; and
- publication on the SEC Website.

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
• Application of approved changes to the SEC. • Publication of a new version of the SEC on the SEC Website and issuance to SEC Parties. • Review and update any impacted SEC guidance materials.	Two Man Days maximum	£1,200 ¹

5. Proposed Progression

5.1 Modification Path

The modification is not expected to have a material impact on the SEC, SEC Parties or the DCC. The change will enable functionality within the DCC Systems to be utilised without any potential issues of non-compliance within the SEC provisions. Therefore, it should proceed as a Path 3 'Self-Governance' Modification Proposal.

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

5.2 Indicative Progression Timetable

The following is a high level indicative progression plan, which is subject to change. Any changes to the overall timetable is subject to Panel review.

Modification Timetable		
Stage	Start	Finish
Modification Proposal raised	25 th May 2017	N/A
IMR considered by the Panel	2 nd June 2017	9 th June 2017
Refinement Process	N/A	N/A
Modification Report Consultation	14 th June 2017	5 th July 2017
Change Board Vote	19 th July 2017	
Implementation	5 WDs following the end of the 10 WD Self-Governance referral period.	

6. SEC Panel Decisions

The Panel is requested to:

- **AGREED** for SECMP0036 to progress as a Path 3 – Self Governance modification;
- **AGREED** that the impacts of this Modification are primarily on the SEC, Supplier Parties and the DCC;
- **AGREED** to submit SECMP0036 for Modification Report Consultation; and
- **AGREED** that SECMP0036 should be progressed per the timetable in section 5.2 of this IMR.

7. Further Information

More information is available in:

- **Attachment A** – SECMP0036 Modification Proposal Form;
- **Attachment B** – SECMP0036 Draft Legal Text;
- **Attachment C** – SECMP0036 draft Modification Report; and
- **Attachment D** – SECMP0036 draft Modification Report Consultation response form,

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

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 8 of 9

This document has a
Classification of **White**

© SECCo 2017

8. Appendix A – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
	Fast-Track Modifications	Means Modification Proposals (Path 4 Modifications) to correct typographical or other minor errors or inconsistencies to the Code (Section D2.8, SEC Stage 3.0).
	General SEC Objectives	Has the meaning given to that expression in Section C1 (SEC Objectives) (Section C1, SEC Stage 3.0). The SEC Objectives are those objectives that the SEC has been designed to achieve.
	Greenhouse Gas Emission	Means emissions of Greenhouse Gases, as defined in section 92 of the Climate Change Act 2008 (Section A1, SEC Stage 3.0).
	Path Type	Means the Modification Path to be followed in respect of a Modification Proposal. The type of Path will depend upon the nature of the variation proposed in the Modification Proposal (D2.1, SEC Stage 3.0). The four Modification Paths under the SEC are: • Path 1 Modifications: Authority-led (Section D2.4/D2.5, SEC Stage 3.0) • Path 2 Modifications: Authority Determination (Section D2.6, SEC Stage 3.0) • Path 3 Modifications: Self-Governance (Section D2.7, SEC Stage 3.0) • Path 4 Modifications: Fast-Track Modifications (Section D2.8, SEC Stage 3.0)
	Party Category	Means one of the following categories: (a) the Large Supplier Parties collectively; (b) the Small Supplier Parties collectively; (c) the Electricity Network Parties collectively; (d) the Gas Network Parties collectively; or (e) the Other Sec Parties collectively. (Section A1, SEC Stage 3.0).
	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.

SECP_45_0906_15

2nd June 2017

Version 1.0

Page 9 of 9

This document has a
Classification of **White**

© SECCo 2017