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Stage 03: 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'.



This Modification Report Consultation will close at **5pm** on **Wednesday 19th July 2017**.



Impact on:

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

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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Page 1 of 12

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Content

1. Summary	3
2. Why Change?	4
3. Solution	5
4. Impacts and Costs	6
5. Views on SECMP0036	8
6. SEC Panel Decisions	9
7. Further Information	10
Appendix A – Glossary and References	12

About this document

This document is the Draft Modification Report for SECMP0036. The Smart Energy Code (SEC) Panel has considered this report to ensure that due process has been followed and determined that this modification should be issued for Modification Report Consultation.

We therefore ask SEC Parties to comment on the suitability of this Modification Proposal before submitting it for the Change Board vote.

This Draft Modification Report has two attachments:

- **Attachment A:** SECMP0036 – Draft legal text; and
- **Attachment B:** SECMP0036 – Modification Report Consultation response form.

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 Why Change?

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 just the one.

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, the implementation date of this Modification is proposed to be **5 Working Days (WD)** following the end of the 10 WD referral period, which commences following the Change Board vote.

1.5 Progression Path

This modification has been progressed as a Path 3 'Self-Governance' Modification.

2. Why 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 just the one.

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 will therefore 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 might 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.

However 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 as restrictive as they are.

As part of these discussions it has also been clarified with the 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, while it is possible within the DCC Systems for a single User ID with 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.

3. Solution

3.1 What's the solution?

SECMP0036 seeks to change 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 other combinations have 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 could be raised. Noting that such a change would have associated DCC System impacts.

3.2 Propsoed draft legal text

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

3.3 Proposed implementation approach

As this Modification Proposal only seeks 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.

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

4. Impacts and Costs

4.1 Impacts

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

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 Impact Supplier and Gas Supplier.
Networks	There are no anticipated impacts on these party categories by the implementation of this Modification Proposal.
DCC	
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
SEC 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 amendments 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

¹ Based on a blended rate of £600 per day

5. Views on SECMP0036

5.1 Proposer's Views against SEC Objectives

The Proposer's view on how this modification will better facilitate the achievement of the SEC objectives are set out below

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. 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.

6. SEC Panel Decisions

The SEC Panel has:

- **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 set out below.

Modification Timetable		
Stage	Start	Finish
Modification Proposal raised	25 th May 2017	N/A
IMR considered by 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 ²	
Implementation	5WDs following the end of the 10WD Self-Governance referral period.	

Additional User Role information requested by the Panel

The Panel considered SECMP0036 at its meeting on 9th June 2016.

During its consideration of the modification an observation was raised around Export Supplier User roles and what stops a User who is only an Import (and/or Gas Supplier) from sending Export Supplier Service Requests (SRs) and therefore undertaking Export Supplier activities and actions on a meter.

SECAS agreed to provide more information around the current arrangements as part of the Modifications Report for SECMP0036. This additional information can be found below.

² Due to the Modification Report Consultation being issued late, SECMP0036 will be presented to the Change Board at its meeting in August 2017.

- **User Role Eligibility:**
 - Section H1.3 states that the services provided over the DCC User Interface are available only to Users within certain User Roles. Therefore, a Party wishing to act as a User in one or more User Roles must first complete the User Entry Process for that User Role.
- **Anomaly Detection Thresholds (ADT):**
 - Currently there are specific solutions and restrictions in place (ADTs) to prevent a SEC Party (who hasn't completed a User Entry Process for Export Supplier) from sending Export Supplier related Service Requests.
 - SEC Party's are required to set ADT's for any User Role(s) specific SRs. In live operations – SEC Parties use a DCC Excel Spreadsheet to inform the DCC of the values and timescales associated with each SR they wish to use / not use.
 - The DCC should be checking what User Roles a SEC Party is allowed to operate in before they accept and load in the ADTs for that SEC Party.
- **Service Requests that can be sent by Export Suppliers**
 - There are 15 SRs that an Export Supplier can issue. 10 of these can also be issued by Import Suppliers and/or Gas Suppliers. With the remaining five being Export Supplier specific (i.e. they are not available to Import or gas Supplier User roles).
 - None of the five Export Supplier specific SRs are critical SRs. One is for setting configuration details on a meter and the remaining four relate to reading or retrieving data.
- **DCC processing of SRs**
 - If the DCC receives an SR from the Export Supplier only list of SRs, and the Party in questions only operates as an Import Supplier and/or Gas Supplier, the DCC systems will reject it and check it against registration data.
- **User Entry Process**
 - As part of the User Entry Process, SECAS will notify the DCC and the SEC Panel of the User Role(s) that a SEC Party has successfully completed the User Entry Process for. This provides another check for what a User can and cannot do.

7. Further Information

Further information about this Modification can be found in Attachments A and B as well as on the register page of the SEC website. You can also contact the SEC Modifications Team on SEC.Change@gemserv.com.

- **Attachment A:** SECMP0036 -- Draft legal text; and

- **Attachment B:** SECMP0036 – Modification Report Consultation response form.

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).