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SECMP0058 ‘Changes to the governance of the Self-Service Interface’

First Working Group Consultation responses

About this document

This document contains the full collated responses received to the first SECMP0058 Working Group Consultation.

Question 1: Do you agree that the SECMP0058 proposed solution better facilitates the SEC Objectives and should be approved?

Question 1			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Yes	We note that the proposed changes to not alter Self-Service Interface (SSI) access and we do not therefore support the views expressed by the Working Group (WG). However, we believe a more efficient change process for the SSI will enable more effectual installation and operation of Smart Metering Systems in the short term, and thus that this Modification better facilitates SEC objective a.
Western Power Distribution	Network Party	Yes	We believe that this modification better facilitates SEC Objective (a) by improving the process for making changes to the SSI, and therefore aiding the efficient provision, installation and operation of Smart Metering Systems. We also believe that this modification better facilitates SEC Objective (b) as improving the process for making changes to the SSI will allow the DCC to efficiently comply with the General Objectives of the DCC.
Bryt Energy Limited	Small Supplier	Neutral	At present it is not clear on how agile in delivery DCC will be and imposes no detail on the release cycle for delivery of the change, only the timescales for authorisation up until the change is agreed. There are no timescales for each of the “Four Month” release consultations or imposes minimum/maximum delivery times for DCC for the agreed SSI changes or how much change DCC can cope with in each cycle. The reason for this MOD is stated that the current SSI does not meet the current requirements and is too slow to implement change. However, at present there appears to be no evidence in the MOD of how this will speed up delivery of SSI change. Secondly there appears to be no “SSI MODS” lined up awaiting delivery.

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Question 1			
Respondent	Category	Response	Rationale
			<p>We would expect to see a clear defined process as per diagram, each clearly defined with a total day allowance for each stage of the change process.</p> <p>The new process is unclear on if multiple changes are “bundled” together and can be accepted or rejected or can a single change be removed from scope and not agreed? Which sub-groups will be responsible? Which groups will resolve differences of opinion? How long should this take?</p> <p>While we agree in principle with the MOD as the SSI is the primary customer interface between SEC User and DCC and should be Agile in receiving, impact assessment, and delivering changes and the SEC parties in defining and signing off deliverables, this proposed process falls short and does not put enough ownership on key parts of the process for time and delivery and new financial burdens to SEC parties.</p>
SSE	Large Supplier	Yes	<p>We agree that the proposed solution better facilitates SEC Objectives:</p> <p>(b) though improved co-ordination of the activities, systems, and procedures of SEC Parties by providing a more efficient and agile route to improve how we access DCC Services.</p> <p>(a) we believe this will be positively impacted because of introducing this new governance approach and therefore implementing improvements more efficiently to increase the access to DCC Services via the SSI.</p>
EDF Energy	Large Supplier	Yes	<p>We agree that the proposed solution better facilitates SEC Objective (b) as it will enable DCC to provide services that meet the needs of its Users in the most efficient and economical manner, in line with the First Enduring General Objective in the DCC Licence.</p> <p>We also agree that the proposed solution better facilitates SEC Objective (g) as it will ensure that low level design detail that is not relevant to the objectives of the Smart Energy Code is not included in the SEC and therefore made subject to a disproportionately onerous change process.</p>

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Question 1			
Respondent	Category	Response	Rationale
			For the avoidance of doubt we believe that the proposed solution is neutral against the other SEC Objectives. There is no direct link between the change process for the SSI and the actual operation of smart meters; we do not believe that there is an evidence to substantiate that this change would directly impact the operation of smart meters. It will, however, enable changes that do have a beneficial impact to be made in a more agile, cost-effective way.
Npower	Large Supplier	Neutral	<p>We feel that the SSI is not currently fit for purpose and requires updating. There are benefits of improving the change control process for the SSI, however, we would like to see the necessary governance arrangements that would need to be in place to ensure proper control and approval</p> <p>Our preference would be for the DCC to implement the alternative solution that they proposed i.e. to leave Appendix AH as detailed but to implement an alternate change process for this document (and also other documentation that may require quicker/cheaper turnaround) – such a process could perhaps be a monthly process along the lines of other code Change Pack processes</p>

Question 2: Will your organisation be impacted due the implementation of this modification?

Question 2			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Yes	We expect that with a robust governance process in place which cannot be misused (in place of Elective Services for example), we will experience positive operational impacts from changes to the SSI.
Western Power Distribution	Network Party	Yes	We will be required to review and potentially respond to additional consultations that will be issued as a result of this modification. Implementation of this modification will also provide a new process to follow should we wish to raise any changes to the SSI.
Bryt Energy Limited	Small Supplier	Yes	Yes, more industry change on a key Customer Service Element used to interact with the DCC.
SSE	Large Supplier	Yes	We believe the proposed modification would generally have a positive impact allowing changes to the DCC SSI to be raised, assessed and implemented in a more efficient and agile way.
EDF Energy	Large Supplier	Yes	We will need to ensure that we are properly resourced to be able to engage with the proposed change process for the SSI Baseline Requirements Document. However, we do not expect the demand on our resources to be more than we currently see for SSI related matters.
Npower	Large Supplier	Neutral	

Question 3: Will your organisation incur any costs due to the implementation of this modification?

Question 3			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Yes	Our share of the implementation costs in the short-term, our share of the charges for approved SSI changes in the long-term.
Western Power Distribution	Network Party	No	
Bryt Energy Limited	Small Supplier	Yes	Yes, more work to impact assess changes on a more regular basis. Approx. 1 full FTE week per change release cycle to assess, IA & create new changes into business processes and training/rollout.
SSE	Large Supplier	Yes	In terms of the initial implementation, this would be minimal as a proportion of the SECAS costs. On an ongoing basis, these would be our involvement in the consultation impact assessment and responses, alongside the relevant DCC apportioned development costs associated with implementing changes to the SSI.
EDF Energy	Large Supplier	No	We do not expect to incur any direct costs as a result of the implementation of this Modification. We note, however, that the consultation document does make reference to any additional costs that might be incurred by DCC, or any changes to their existing costs that would result from making these changes. We would welcome confirmation from DCC on the expected impact of this Modification on the charges that they would seek to recover from their Users.
Npower	Large Supplier	Neutral	

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Question 4: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agreed that SECMP0058 should be approved?

Question 4			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	No	<p>We fully support the notion of a more flexible, more agile approach to SSI changes, and believe that such a change to be beneficial to Users. However, we believe that further work is required within the legal text and the consultation documentation.</p> <p>It is our understanding that the intent of this Modification is to introduce the following changes:</p> <p>SEC Appendix AH would be stripped of technical detail pertaining to the requirements of the Functional Components of each Business Functional Domain, and this technical detail would be moved into a DCC-owned document;</p> <p>SEC Appendix AH would be retained within the SEC to detail the access requirements and governance controls relating to the SSI;</p> <p>The SSI Baseline Requirements Document containing the technical specifications of the SSI will reflect the live functionality of the SSI at the time of its publication;</p> <p>The SSI Baseline Requirements Document (SSI BRD) would be published each time a revision was made to the requirements of the Functional Components of any Business Functional Domain;</p> <p>A 'delta' document would be published alongside each version of the DCC-owned specification document, detailing the changes that have been made to the specification since the last version was published;</p> <p>The process to manage changes to the SSI is three-fold:</p>

Question 4			
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			<p>Pre-design development of change: consultation with Industry to seek approval for an initial scope of SSI changes (including amongst other things, a forecast cost for said changes);</p> <p>Post-design development of change: engagement with Panel or a relevant sub-committee to seek approval of any scope changes that arise in development;</p> <p>Post-build development but pre-deployment of change: engagement with Panel or a relevant sub-committee to seek approval of deployment for the developed SSI changes;</p> <p>Consequential changes will be made to SEC to denote the impact of the SSI changes to Maintenance activities;</p> <p>Consequential changes will be made to SEC to extend the role of the Panel in accordance with the requirements of this change, and</p> <p>Consequential changes will be made to the ToR of any Panel Sub-Committee to facilitate the requirements of this change.</p> <p>We would appreciate some clarity on this though because there is not a complete and concise version of the full solution in a single space within the consultation documentation.</p> <p>We feel that the detail included within the consultation documentation either does not well reflect the discussions at the last Working Group (WG), or is inconsistent with other parts of the consultation documentation. We note these points for consideration below, but due to the scale of comments, we have separated these into major and minor:</p> <p>Major:</p> <p>No business-case has been provided within the consultation documents, thus we are unable to determine the value of this modification with regard to the potential costs (which as a minimum will include additional DCC resource over time, and a 9.5% Shared Service Charge).</p>

Question 4			
Respondent	Category	Response	Rationale
			<p>The consultation documents do not cover the cost recovery mechanism for the SSI changes. We expect this to be made explicitly clear to SEC Parties such that they may make informed consultation responses with regard to the impact that this Modification will have on them.</p> <p>The consultation documents note that SEC Appendix AH will contain the key governance rules for the SSI change process, whereas the SSI BRD will contain the step-by-step rules which will apply to the process. It is our view that the governance of this process should be in one place only, to avoid any misunderstanding of governance arrangements; it is further our view that the governance arrangements must be within SEC to ensure that the arrangements are robust, transparent, visible and of course, binding. Where this is not the case we would request that the WG reconsider the Path of this Modification in accordance with SEC Section D2.6 (a), (c) and (d). – We note that the Draft Modification Report does not contain the Path of this Modification but is it recorded within the Initial Modification Report as a Path 3 Modification.</p> <p>The consultation documents do not cover the communications requirements that we believe were agreed upon at the last WG meeting. We believe it necessary that the communication of this process is fully captured and contained within the legal drafting due to the nature and potential consequences of the changes that may occur outside of the consultation process.</p> <p>The content of the initial consultation for SSI changes does not include the governance process; it is our view that the previous WG had noted that Industry would be required to endorse or at least be informed of, the governance process for changes to the scope of the SSI changes being consulted upon.</p> <p>There are currently no powers for either Panel or any of their relevant Sub-Committees to make financial decisions on behalf of Industry; we believe this is a valid omission and would request that where changes to scope result in an increase to the forecast spend, Industry</p>

Question 4			
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			<p>are re-consulted. We believe that this needs to be a requirement, rather than simply an option for individuals in attendance at a single meeting to decree. We would further request that this consultation process be made clear within the legal text (e.g. minimum number of WDs for consultation period etc).</p> <p>Consequential changes are missing from the Modification and we find that we cannot support the proposal without understanding and approving these changes:</p> <p>the planned maintenance arrangements contained within the SEC will apply once the Panel's current derogation expires. The arrangements do not permit the SSI amendments to be made unless DCC declares them as Unplanned Maintenance. The notification requirements for Unplanned Maintenance are not sufficient for operational mitigation and we therefore feel that until the implications for DCC outages are clear we cannot support the proposal: the improvements to SSI that may result from this process do not outweigh the risk to our live operations or consumers where outages lacking adequate notice periods become commonplace. In addition we would note here that the approval rights that Panel delegated to the Operations Group cease with the Panel 'derogation';</p> <p>the SEC amendments required to permit/oblige Panel to perform the requirements outlined within this solution have not been included (i.e. Panel may need to manage and approve changes to the SSI changes consulted upon and certainly will in the case of escalation, Panel would have to review the consultation process relevant to SSI changes at least annually, and Panel would have to approve changes to the specification document for SSI following consultation with Users. We would like to see these updates contain a specific requirement that Panel are provided with all consultation responses, not amended in any way, in sufficient time ahead of being asked to provide approval for changes to the DCC-owned SSI specification document.</p>

Question 4			
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			<p>the ToR of any relevant Panel Sub-Committee would need to be amended much the same as above.</p> <p>Minor:</p> <p>The process diagram does not reflect:</p> <ul style="list-style-type: none"> how the changes for SSI being proposed have been scoped (i.e. how Users may feed-in their change requests); the two sets of approval required from Panel or a relevant Sub-Committee: development and deployment; the second consultation that can be requested by Panel or a relevant Sub-Committee; escalations to Panel from the relevant Sub-Committee; the outcome of rejections from Panel or Sub-Committees; the consultation process for 'urgent' SSI changes that can be requested by Users, and the result of change approval or of change send-back. We would request that any diagram provided within the consultation documentation reflect the full process being proposed so as to avoid any misconception. <p>The process diagram requires the Panel or a relevant Sub-Committee to be consider the scope of proposed SSI changes after the consultation but ahead of the consultation content sign-off. This seems to us to be an unnecessary inefficiency; we would have expected this to fall ahead of the consultation.</p> <p>The renaming proposed by DCC means that on an enduring basis there is no Specification for the SSI i.e. the DCC-owned document is titled 'SSI Baseline Requirements Document' and SEC Appendix AH is titled 'SSI Access Control'. We do not support this proposal because we feel that it introduces inconsistency and ambiguity rather than adding any value</p>

Question 4			
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			when compared with today's arrangements. We would additionally highlight that the suggested change to Appendix AH would not adequately reflect the content of the subsidiary document if the solution were amended such that the governance process was retained under SEC-governance.
Western Power Distribution	Network Party	Yes	<p>We believe that this modification should be approved as the benefits of having a more flexible, transparent modification process for changes to the SSI, will help to ensure that Users have an efficient system that provides benefits to their processes.</p> <p>This modification also provides a strict governance process that will ensure that any changes Parties or the DCC wish to make to the SSI are approved and signed off by appropriate groups.</p>
Bryt Energy Limited	Small Supplier	No	<p>No, At present, the MOD only contains a cost to remove the high-level requirements of SSI from SEC Appendix. It contains no monthly running costs to administer this new governance process. It contains no running costs for DCC to manage the new governance process. Can we assume that the running costs are only the IA & Development work undertaken by DCC?</p> <p>This is only identified partially, by a noted risk of wasted development:</p> <p>Drawbacks</p> <p>One drawback was identified in the Working Group in that to contain the level of detail required in the industry consultation, DCC would have to carry out more development prior to the consultation, which would increase the risk of cost wastage if the proposed SSI changes would not come to fruition, although this risk was not considered to increase significantly compared to the existing Section D Modification Process.</p> <p>This statement appears to suggest there is a risk the new SSI Governance process is not fit for purpose by that the gap DCC delivery of the IA and acceptance, means that</p>

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Question 4			
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			<p>requirements have could result in wasted DDC change effort seems odd. Secondly, why would the effort required for an IA change to effort into more development?</p> <p>On email request to SECAS Bryt Energy requested the DCC operating costs for this mod (And to be clear not the cost for each proposed IA or change) and the reply was:</p> <p>“Unfortunately I don’t have much detail to give you here but DCC have just advised that they will be looking to provide a view on timescale and cost at the consultation stage of SSI changes and then they would continue to maintain the current range of £50k - £75k per sprint, with approval sought at SEC Ops Group on a monthly basis.”</p> <p>It is unclear if DCC means this to be a total yearly cost to maintain the governance approach of a maximum £225k per year. We are disappointed that costs are not being clearly transparent from the working group and DCC on this mod.</p> <p>In the absence of this, the MOD should not be approved until the question of running costs of the new governance regime are clearly identified. How can a new process be implemented by DCC without a clear cost to serve and the commitment SEC parties are to undertake?</p> <p>We are extremely concerned on this MOD and its approach due to the fact no costs have been provided by DCC and DCC itself is the proposer.</p>
SSE	Large Supplier	Yes	As previously noted, we believe this change should introduce a more efficient and agile mechanism to make changes to the SSI and we are in general agreement to approve the modification.
EDF Energy	Large Supplier	Yes	We agree that implementing SECMP0058 will result in a more agile, timely, and therefore cost-effective change process for the self-service interface. It retains the key elements of the SEC Modifications process while enabling them to be achieved in a more efficient way, being that:

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Question 4			
Respondent	Category	Response	Rationale
			<ul style="list-style-type: none"> Any SEC Party is able to raise a change to the SSI. All Parties will be consulted for their views on proposed changes to the SSI, and the estimated costs of making those changes. SEC Parties and not DCC will make the decision on whether the changes that are proposed should be implemented.
Npower	Large Supplier	Neutral	We would like consideration given to our comments above. In order to support this modification, further development is required

Question 5: Do you believe that the draft legal text changes deliver the intention of the modification?

Question 5			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	No	<p>The legal text provided within the consultation documentation does not appear to cover the requirements for the consultation periods relevant to SSI or SSI BRD changes.</p> <p>The legal text provided within the consultation documentation does not appear to cover the requirements for the SSI changes consulted upon to be within a single financial/regulatory year.</p> <p>SEC Appendix AH</p> <p>Definitions – both DCC Service User Organisation ID and Service User Descriptor have been removed from the legal drafting, we would like to understand the rationale for this and check that these references have been removed from all other relevant text (i.e. the SSI BRD), where this removal is valid.</p> <p>1.1 – we believe that the third paragraph ought to be reworded to denote that Panel’s approval sequentially follows the consultation e.g. “The DCC may make amendments to the SSI Baseline Requirements Document with the agreement of the Panel (or a Sub-Committee to which the Panel has formally delegated the required decision-making power), following consultation with Parties.”</p> <p>1.1 – we believe that the sixth paragraph ought to detail the definition or criteria for ‘urgent’, as well as the content requirements of any such consultation. We further believe that where a consultation for an ‘urgent’ SSI change follows a successful consultation for SSI changes over a period of time, the consultation for the ‘urgent’ change ought to make the following explicitly clear:</p>

Question 5			
Respondent	Category	Response	Rationale
			<p>any consequential changes to the arrangements approved by Panel (or any delegated Sub-Committee) i.e. any amendments to timelines, any alteration to the costs involved etcetera, and</p> <p>any potential SSI changes that were in-scope of the original consultation that could be removed to ensure that the arrangements so approved do not alter (with a specific question as to whether this course of action ought to be taken).</p> <p>In addition, we believe that it ought to be clear within the legal text that no 'urgent' change to the SSI can be made where the delivery of such a change would bridge two financial/regulatory years.</p> <p>1.6 - we believe that 'Self Service' ought to be written 'Self-Service'.</p> <p>2.5.1 Table – the table within 2.5.1 contains instances of defined terms written in lower-case, we would ask that these be corrected.</p> <p>2.5.1 Table – the table within 2.5.1 contains instances of 'organization', we would request that these are replaced with 'organisation'.</p> <p>2.5.1 Table – the current legal drafting removes the User Catalogue references utilised throughout the table within the Functional Component column. We would request clarification as to whether these references are contained anywhere else, and if not whether a list of these references and their associated description ought to be retained within SEC Appendix AH for clarity. We believe it would be difficult for new SEC Parties to understand these references where they are no longer part of the legal text, or retrievable from any other source.</p> <p>2.5.1 Table: BFD02 – we believe that the first instance of 'device' within the Service capability field ought to be written as 'devices', or as 'the device and'.</p>

Question 5			
Respondent	Category	Response	Rationale
			<p>2.5.1 Table: BFD04 – SEC Section H8.16(b) is not as clear with regard to the User access restrictions as was the legal text for UC_Service Audit_001. We would therefore request that the Access Controls relevant to this Interface Transaction be copied over into the ‘Defined Access’ field of the new legal text (i.e. the requirements of 1.10.4 from the original SEC Appendix AH are moved into the relevant field within 2.5.1 of the new legal drafting of SEC Appendix AH).</p> <p>2.5.1 Table: BFD05 – we believe that ‘SEC release’ ought to be written as ‘DCC-impacting SEC Releases’, such that this meets the criteria of the list in which it falls (i.e. DCC Smart Metering ecosystem).</p> <p>2.5.1 Table: BFD05 – the relevant access controls from the original legal text of SEC Appendix AH (1.10.14) are missing from this row. We would request that these be written into the table and retained as SEC requirements; we would not condone meter firmware events being visible to any User other than the Responsible Supplier.</p> <p>2.5.1 Table: BFD09 – we believe that ‘raise, update’ we believe ought to be ‘raise and update’, that that ‘Enabling Users to track’ ought to simply be ‘track’, and that ‘full details of the details of the raised’, ought to be ‘full details of the raised’.</p> <p>2.5.1 Table: BFD09 – the relevant access controls from the original legal text of SEC Appendix AH (1.10.19) are missing from this row. We would request that these be written into the table and retained as SEC requirements; we would not condone service request activity being undertaken by or visible to any Party other than the relevant User.</p> <p>2.5.1 Table: BFD10 – we believe that ‘diagnostics down individual’ ought to be written ‘diagnostics down to individual’.</p> <p>2.5.1 Table: BFD11 – we would ask for clarification as to whether the list of pre-defined reports that has been removed from the original SEC Appendix AH text is available from</p>

Question 5			
Respondent	Category	Response	Rationale
			<p>any other source. Where is not, we believe that the list of pre-defined reports original contained within 1.9.1 ought to be written into the Service capability field.</p> <p>2.5.1 Table: BFD12 – we believe that ‘detailing operation of DCC services’ ought to be written ‘detailing the operation of DCC Services’.</p> <p>2.5.1 Table: BFD13 – we believe that ‘Hib’ ought to be written ‘Hub’.</p> <p>2.5.1 Table: BFD14 – for clarity, we believe it would make more sense for ‘create a new person’s account’ to be written as ‘create a new account for User Personnel’, so as to permit accounts to be created for existing personnel (due to role changes etc).</p> <p>As a result of all of the other consultations requiring an address at present, we have not been able to review the re-numbering of the legal text for accuracy of cross-referencing, so we can make no further comment. In addition, we have been unable to review the SSI Baseline Requirement Document but we have included the previous feedback that we shared with the Proposer below in case that helps.</p> <p> SECMP0058_Proposer.docx</p>
Western Power Distribution	Network Party	Neutral	<p>Although we have not yet reviewed all the legal text in depth, we feel that in the SEC Appendix AH Section 1.1 there is wording that requires further clarification.</p> <p>We believe that the statement ‘Any SEC Party may propose a change to the Self-Service Interface at any time’ should be expanded to explain how a Party proposes a change, and to who this request should be sent. This clarification is also missing from the Proposed SSI Governance Process document.</p>
Bryt Energy Limited	Small Supplier	No	No. See Q1.

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Question 5			
Respondent	Category	Response	Rationale
SSE	Large Supplier	No	<p>We are in general agreement that the draft legal text changes deliver the intention of this modification however, we believe there is still further clarity required on elements of the process and these need to be addressed in some form to ensure that Parties clearly understand the SSI Change Governance Process.</p> <p>We have noted these in our response to Q10) as dependent on the WG consultation responses and subsequent WG review, these could be addressed in:</p> <p>SEC Appendix AH SSI Baseline Requirements Document SSI Change Governance Process</p>
EDF Energy	Large Supplier	Neutral	We have not identified any issues with the draft legal text changes but we have not been through the changes in a lot of detail.
Npower	Large Supplier	Neutral	

Question 6: Do you agree with the recommended implementation date?

Question 6			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Neutral	Where we can support the solution proposed we agree with the recommended implementation date, at this time however we do not agree with the proposed solution.
Western Power Distribution	Network Party	Yes	
Bryt Energy Limited	Small Supplier	No	No, more work to define the change process is needed as per Q1.
SSE	Large Supplier	Neutral	We are supportive of implementation being prior to the next Regulatory Year 2019/20, to enable the new process to be implemented in line with that period.
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date. As part of the implementation of this change consideration will need to be given to whether/how changes to the SSI that are currently being discussed and progressed will be handled under the new change process.
Npower	Large Supplier	Yes	

Question 7: Do you agree with the proposed SSI Change Governance Process (Attachment E)?

Question 7			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	No	As above, we believe that further work is required on this process
Western Power Distribution	Network Party	Yes	As detailed in our answer to Q5, We believe that the statement 'SEC Parties may propose changes to the SSI at any time' should be expanded to explain how a Party proposes a change, and to who this request should be sent.
Bryt Energy Limited	Small Supplier	No	No, more work to define the change process is needed as per Q1.
SSE	Large Supplier	Yes	We are in general agreement with the proposed SSI Change Governance Process, however we believe further clarification is required for certain elements, as referenced in our responses to Q5) and Q10).
EDF Energy	Large Supplier	Yes	We agree with the high level process as set out in the documentation but we would welcome further detail on how each of the steps will be undertaken – and especially how the decision to implement a change is made, and by whom.
Npower	Large Supplier	Neutral	We would prefer the alternative solution provided that could be implemented with a change process for this document. This would provide assurance that parties have visibility and provide assurance of proper control and approval.

Question 8: Do you think the proposed SSI Change Governance Process (Attachment E) should be referenced to in the legal text?

Question 8			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Yes	As aforementioned.
Western Power Distribution	Network Party	Yes	We believe that the SSI Change Governance Process should be referenced in the legal text to ensure that the correct process is followed by all Parties. It will also help Parties with ease of reference if this document is noted within the appropriate section of the legal text.
Bryt Energy Limited	Small Supplier	Yes	Yes, this then provides a clear link between the process and the regulation that overarches it.
SSE	Large Supplier	Neutral	We are supportive in principle as it would be useful to have an overarching document where all the relevant information regarding the SSI Change Governance Process can be referenced, and potentially has further explanatory text to aid SEC Parties understanding. We believe this could be managed via the Code Administrator, for example using a similar approach to information provided for the Issues Process.
EDF Energy	Large Supplier	Neutral	We do not believe that the detailed steps of the process would need to be set out in the legal text as that could require further Modifications to amend that process if required. It would be more appropriate for the legal text to refer to a governance process that is consulted on and managed by the Panel, but which sits outside of the SEC itself.
Npower	Large Supplier	Yes	

Question 9: Should clauses 1.2 to 1.6 in SEC Appendix AH be moved to the SSI Baseline Requirements Document (Attachment D)?

Question 9			
Respondent	Category	Response	Rationale
E.ON Energy Solutions	Large Supplier	Neutral	<p>We do not understand this question: clauses 1.2 to 1.6 from the original text of SEC Appendix AH have been retained within the amended legal text of the Appendix (Attachment C); 1.2-1.4 have simply been renumbered, and 1.5-1.6 have been moved. – We agree with this retention, if that the is question?</p> <p>If the question refers to moving 1.2-1.6 of the amendment Appendix (Attachment C) into the SSI BRD via a further consultation, then no we do not agree with the move.</p>
Western Power Distribution	Network Party	No	We believe that these are the security requirements surrounding access to the SSI and not the functionality of the SSI. Therefore, these specific requirements should remain within the SEC Appendix AH and should be subject to the Section D Modification process should a Party wish to amend them.
Bryt Energy Limited	Small Supplier	Yes	Yes
SSE	Large Supplier	Neutral	
EDF Energy	Large Supplier	No	<p>Appendix AH should retain any obligations that are placed on DCC or its Users and which other Parties may be reliant on for their efficient operation. Some of the content in clause 1.2 to 1.6 should seem to fall under this definition:</p> <p>1.2 (Freshness of Data Sources) – Users are reliant on the data presented via the SSI being as up to date as possible to this obligation on the DCC should be retained within the SEC.</p>

Question 9			
Respondent	Category	Response	Rationale
			<p>1.3 (Interactive Web Interface) – there are no clear obligations in this section, should the DCC be obliged to timeout any connection to the Self-Service Interface after a period of inactivity of 15 minutes for security purposes then this should be included in Appendix AH.</p> <p>1.4 (File Download Interface) – this places obligations on DCC and should be retained.</p> <p>1.5 (Interaction with Order Management Systems (OMS)) - this places obligations on DCC and should be retained.</p> <p>1.6 (Error Handling) - this places obligations on DCC and should be retained.</p>
Npower	Large Supplier	No	

Question 10: Do you have any other comments?

Question 10		
Respondent	Category	Comments
E.ON Energy Solutions	Large Supplier	The history of SSI changes aside, we would like to reiterate our thanks to the relevant members of the DCC for all of their time and effort in helping Users to achieve greater value from SSI via this body of work. – We would further like to thank those individuals for their efforts in making the SSI BRD an accessible and usable document for Users, it is very helpful and we are grateful to you.
Western Power Distribution	Network Party	No further comments.
Bryt Energy Limited	Small Supplier	No
SSE	Large Supplier	We would like clarification and further information provided around the proposed solution processes relating to: Mechanism by which SEC Parties can propose a change to the SSI – will this be via standard template, what will be the route to submit and how will these proposals be logged and visible to all Parties; Timescales for when DCC will respond to initial requests – both urgent and non-urgent; Timescales for when SSI Change Proposals need to be submitted to be considered within the standard consultation process; Timescales for when DCC will assess responses to the consultation and refer to the SEC Panel or a delegated Sub-Committee for consideration and subsequent approval or rejection; Point at which changes to SSI business requirements will be presented to the Customer Working Group – prior to live implementation.
EDF Energy	Large Supplier	We agree that a more agile approach to managing changes to the SSI would be of benefit, but as noted before any new process needs to retain the key features of the SEC Modifications process, which are that:

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Question 10		
Respondent	Category	Comments
		<ul style="list-style-type: none"> Any SEC Party is able to raise a change to the SSI. All Parties will be consulted for their views on proposed changes to the SSI, and the estimated costs of making those changes. SEC Parties will make the decision on whether the changes that are proposed should be made, based on an accurate view of the costs that will be incurred. <p>We are especially concerned about the last point; it must be ensured that SEC Parties are in control of any costs that are incurred as a result of making changes to the SSI.</p>
Npower	Large Supplier	No