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Action:	**For Information**

SEC Change process improvements: release framework and wider SEC change service improvements

1. Purpose

This paper outlines the activities being undertaken to introduce a robust release framework into the SEC and improvements in service for the wider change process.

Many of the improvements being made to the change process understandably overlap, and certainly interact with the work progressing on reducing DCC implementation costs. We have sought to illustrate all the different workstreams in a single place, and this has been included as part of the SEC Panel paper relating to DCC costs; you can find this overview in Appendix A of SECP_63_1412_16.

The Panel is invited to note the planned work and provide any comments they may have.

2. Release framework

The implementation of Release 2.0 highlighted the need for a better framework within the SEC to provide greater clarity on accountability of release activities. This updated framework is being introduced by SECMP0061 'Enduring SEC Release Provisions', which is currently with the Authority for determination; a decision is expected this month. If approved, it will be implemented in the February 2019 Release.

We are working with the DCC to produce a new end to end process which will underpin this new framework. The output from this work will be a new set of policies and subsidiary documents which will sit under the SEC and provide robust governance, as well as clarity, around the release process.

2.1 Updated Policies

The outcome of the DCC benchmarking review is likely to impact the content of the Release Management Policy (RMP) and will certainly impact the drafting of the Testing Approach Document. It may also impact the number and type of other policies that we require to support the framework.

As such, we do not believe it prudent to update the policy documentation at this time, since this work may become nugatory. However, once the DCC benchmarking review has concluded we will seek to bring updated policy documentation to the Panel as soon as possible.

For the RMP, we believe the Panel can review and approve a copy of the updated policy at its April 2019 meeting, depending on when the DCC review is completed. The Testing Approach Document

will need input from the Testing Advisory Group (TAG) so this will take slightly longer, but we would hope the updated policy could be presented to the Panel in May 2019.

2.2 SECAS and DCC interactions

We have been working with the DCC to improve the interaction points between the DCC and SECAS to help drive efficiency and better support the release framework.

In the last month we have:

- undertaken a review of the business requirements that we issue to the DCC for assessment, with the aim being to make the requirements and assumptions clearer;
- reviewed the interaction points between the DCC and SECAS and introduced more regular meetings to discuss the details of modifications with the DCC and its service providers; and
- are extending invitations to DCC Service Providers to attend relevant Working Group meetings to input to the discussions on solution development.

It is hoped that as we work more closely with the DCC and its Service Providers, the improvements we have made will not only reduce the cost of assessing change, but also increase the speed at which assessments are returned.

We intend to provide an update at the January 2019 Panel meeting on the interaction points we have with the DCC throughout the lifecycle of a modification, to provide some transparency of how the business-as-usual working practices support the release framework and the progression of modifications in general.

3. Service improvements

At the November 2018 Panel meeting[1] we highlighted that whilst undertaking the Section D Review we had identified a number of areas that could be improved, both within the SEC drafting and in the service that we provide. Whilst there are several areas that can be improved, we believe the following four workstreams should be prioritised as they can be delivered within a reasonable timescale and are critical to the success of an efficient change process.

3.1 Raising change

When any change is raised, the first question that should be asked is “what is the problem we are trying to solve?”. Without a clear problem statement, the scope of a change can grow and the solution at the end of the process often does not solve the issue that needs to be addressed or which was originally identified. Currently, the development of a clear problem statement is not prioritised. This situation is not helped by the process requiring Parties to complete a rather lengthy and complex form that encourages them to consider a solution and its impacts rather than the issue they are seeking to address.

The complexity of raising a change and the information required in a Proposal Form also deters smaller market participants who do not have the time or experience to draft such a form. It is equally

[1] Please see Panel paper SECP_62_0911_17 for full details.

difficult for larger Parties who also struggle to get the required information in what is a technical and complex set of arrangements.

We need to introduce a mechanism that allows Parties to easily raise issues and allows the development of a clear problem statement at the very beginning of the process. Raising a change should be easy for all participants, but only those with clear issues should progress.

The introduction of the Change Sub-Committee and the simplification of information required in a Proposal Form in early 2019 (subject to the approval of SECMP0049 'Section D Review: Amendments to the Modification Process') should greatly assist this issue, but we need to make sure the framework around raising change is fit for purpose. We believe we can detail an updated framework for raising change at the January 2019 Panel meeting.

3.2 Working Groups

The issue of how to run Working Groups effectively is not just limited to the SEC. All industry Codes struggle with establishing such groups and getting consistent quoracy, and all have received feedback that the process could be improved.

The issue is exacerbated because industry Codes have never sufficiently adapted processes to account for the concept of Proposer ownership. We still attempt to use Working Groups in the same way we did 20 years ago, even though the landscape has changed significantly.

Using the feedback we have received from the industry, we want to review how we use Working Groups within the change processes and explore new and smarter ways of working. We are fortunate that, under the SEC, we have established groups of experts such as the Security Sub-Committee (SSC), the Technical Architecture and Business Architecture Sub-Committee (TABASC) and the Operations Group (OPSG) that could assist in the progression of modifications. However, these groups are currently underutilised with an over-reliance on Working Group members. The key is to understand what the purpose of a Working Group is and to get the right people involved in the process at the right time.

We intend to seek further feedback from Working Group members over the coming months to help draft a straw man approach on how we can better use Working Groups. We also note Ofgem's desire to have a new approach under the Retail Energy Code (REC). As such, we will also engage with Ofgem to ensure any solution is heading in the right direction. A new straw man approach can then be presented at the Panel meeting in February 2019 for consideration.

3.3 Communications

Communicating the status of change is critical to getting better industry input into the process. We have received feedback on areas where we can improve our communication regarding change, such as with the SEC Website, and intend to act upon it. Since communication of change is linked to how we use Working Groups, we intend to update the Panel at the February 2019 meeting on the steps we have taken to make communications clearer and more accessible.

3.4 Subsidiary documents

One of the main issues with the drafting of the SEC is that it contains detailed technical requirements as well as obligations and principles. It has also led to a confusing array of Schedules and

Appendices which have become cumbersome to update or change, as every such document is subject to the Modification Process.

One example of this has been with updating the Self-Service Interface, due to the very detailed specifications being a SEC Appendix and so requiring a modification to update; the Panel has agreed a workaround to this issue until an outcome is reached on SECMP0058 'Changes to the governance of the Self-Service Interface'. Further complexity also arises with the development and implementation of new versions of the Technical Specifications and the associated applicability matrix.

We note that other Codes contain subsidiary documents for such information, which may be subject to a lighter change process, and believe we should explore this option further under the SEC. Since we are rewriting the RMP, it seems a sensible time to consider the creation and governance of subsidiary documents.

We will explore the options of subsidiary documents and how these can be structured under the SEC, and present our findings to the Panel in March 2019, to coincide with the findings of the DCC review.

4. Further input from the Panel

There are many nuances to the change processes under the SEC and we feel there will be further areas we can improve. We will be reviewing the arrangements for further improvements and wish to seek as much input as possible on this from the Panel. However, we believe that this would take up too much time to discuss at a scheduled meeting. We would therefore like to offer a short 'ideas gathering' session before the Panel meeting in January 2019. The purpose of this session would be to provide an update on the progress to date and to provide a setting where we can gather and discuss any solutions or issues Panel Members have identified regarding SEC change in a more informal setting.

If that is not possible then individual Panel Members are welcome to contact myself or a member of the SEC Change Management team in order to have a discussion on the change process and to feed in thoughts and suggestions.

5. Recommendations

The Panel is requested to:

- **NOTE** the contents of this paper; and
- **PROVIDE** any views and comments on SECAS's proposed workstreams and key milestones.

David Kemp

SECAS Team

7 December 2018