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

Working Group Meeting 4

16 January 2019, 10:00 – 11:00, Gemserv’s Offices

Meeting summary

SSI change governance process document

The Working Group meeting began with a review of the modification and a recap on the outputs following the Working Group Consultation, and subsequent discussions between SECAS and the DCC to refine the solution and provide more clarity around the governance of the Self-Service Interface (SSI).

SIP cost brackets

The Working Group were asked to provide their views on the updated SSI change governance process (Annex D of the Modification Report) and a Working Group member questioned the proposed t-shirt sizing for SSI Improvement Proposals (SIPs) of Small (below £50k), Medium (£50k-£100k) and Large (exceeds £100k). The member believed that any improvements to the SSI would be small and that the scope should not impact the wider DCC Total Systems and should therefore not be exceeding £100k. The DCC understood the member’s view and advised that any risks of wider impacts to the DCC Total Systems found at Impact Assessment would be fed back to the Panel or any delegated Sub-Committee for consideration before implementation.

The member then advised that this risk could be alleviated up front whereby SSI Improvement Proposers would be clear on the types of SIPs they were submitting and which DCC Systems they would impact. This would prevent the SSI from potentially becoming a dumping ground for complex changes with a wider scope than just the SSI and Remedy systems. Other members noted that this would be hard to achieve as SSI Users don’t have a clear enough understanding of the DCC Total Systems in order to properly assess the wider impacts of their own SIPs. It was suggested whether guidance on the types of changes that could be included under this process could be produced, but the Working Group did not want to be prescriptive.

DCC validation and prioritisation timescales

The proposed SSI change governance process document advised that proposals submitted should take no longer than 20 Working Days for the DCC to carry out their assessment of a new SIP and provide feedback to the proposer. A member disagreed with this timescale and believed that it could be shortened, to speed up the end to end process. The DCC clarified that this timescale was not set in stone and that it depended on the scope of each SIP, but that where they could carry out their assessment of any SIP sooner than this timescale they would do so, with the assessment of previous

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high priority SIPs being turned around in a matter of days. Other Working Group members also advised that the rules within the SSI change governance process document are subject to change once the process is implemented and improvements are realised and felt the 20 Working Day turnaround target was an appropriate figure to begin with.

One Working Group member was concerned about the end-to-end timescales proposed for the process, noting it could be up to seven months between submission and implementation. They did not feel this was a particularly agile approach. Other members noted that this was a consequence of the requirement raised previously by the Working Group for industry consultation needing to take place, and felt the proposed solution was a suitable balance of these two elements. The Working Group noted that while the proposed process may not be that much quicker than a Modification Proposal, the efficiencies of being able to batch changes and the greater flexibility with their assessment and implementation outweighed this. One member noted the likelihood of forming quorate Working Groups to assess each individual change was very small.

The Working Group felt it would be beneficial to publish key dates on the SEC Website such as submission deadlines for a particular batch and the consultation dates, as this would help Parties to plan ahead.

SSI Impact Assessments

The SSI change governance process proposes that SSI improvement consultations occur prior to the DCC carrying out a formal SSI Impact Assessment (IA). A member questioned this approach and proposed the formal IA is carried out prior to the industry consultation in order to provide SEC Parties with a clear view of the costs of each sprint. It was highlighted that this approach had been proposed in previous Working Group meetings but that this would increase the risk of cost wastage if SIPs that were Impact Assessed were subsequently removed due to the feedback received from the SSI improvement consultation. The DCC noted they were unwilling to take the risk of incurring costs for undertaking formal IAs. Other members agreed with the DCC's view that it would be more cost effective for everyone involved for the SSI Impact Assessments to occur after the industry consultation.

A Working Group member requested the DCC provide average costs for SSI IAs to date and to advise how many SIPs had been rejected to date. The DCC took this away as an action.

Changes to the scope (post SSI improvement consultation)

A member noted that more clarification was required for SIPs that changed in scope after the SSI improvement consultation with changes to prioritisation or delays to SIPs a possibility. It was noted that Parties needed to have a view of any changes to the deployment of sprints across the Regulatory Year in order to enforce price control and assess the SIPs that have been paid for against the SIPs that have been delivered.

Furthermore, it was noted the SSI change governance process document needed to be clearer on the governance around changes to the scope post-consultation. It was noted that where the costs exceeded what had been advised in the previous consultation that a second consultation should occur.

SSI improvement sign-off

Some members questioned which group would make decisions relating to the SIPs, noting that neither the Modification Report nor the SSI change governance process clarified this. SECAS advised that the Modification Report and the SSI change governance process document would continue to state that such sign-off would be made by the Panel or any delegated Sub-Committee. If the modification is approved, the Panel would confirm which group this responsibility would sit with, amending terms of reference as applicable. The Working Group may propose that if the Panel decided to delegate SSI sign-off to a Sub-Committee that this could be the Operations Group.

Currently the proposed legal drafting for SECMP0058 does not include any reference to the proposed SSI change governance process. Members noted that for the SSI governance to be legally binding it would need to be referenced in the SEC and it was recommended that this reference should fall within SEC Section H 'DCC Services'. SECAS noted this as an action to fulfil on their part and will subsequently draft SSI governance reference.

Planned Maintenance

SECAS advised that following the implementation or rejection of SECMP0058, the DCC's Planned Maintenance allowance would revert to the obligations in SEC Section H. The DCC advised that they currently do not reach anywhere near the levels of Planned Maintenance assigned to them under the current waiver (no more than six hours per week of SSI Planned Maintenance) but that they were concerned by the 20 Working Day Notice they would have to give to SEC Parties, Registration Data Providers and to the Technical Architecture and Business Architecture Sub-Committee (TABASC).

SECAS clarified that any changes to DCC Planned Maintenance would not be carried out under this modification. The DCC are currently undertaking a review of their approach to enduring Planned Maintenance arrangements that may result in a Modification Proposal in the future.

Confirmation of Working Group views

The Working Group confirmed that its views on the benefits and drawbacks of SECMP0058 were unchanged from those raised before the first consultation.

The Working Group confirmed it agreed with the Proposer's views against the SEC Objectives. Members unanimously supported the views against Objective (b). Members also unanimously supported the rationale DCC provided for Objective (a) although some members considered these were more applicable to Objective (g).

Further actions

The Working Group agreed the following actions to be taken:

- The DCC to provide average cost of SSI Impact Assessments;
- The DCC to advise how many SIP's have been rejected to date;
- SECAS to draft the references to the SSI change governance document in the SEC;
- SECAS to distribute newly drafted SSI Baseline Requirements Document and updated Modification Report to Working Group members for review in preparation for the second Working Group Consultation;

- Working Group to provide feedback to SEC Appendix AH legal drafting in preparation for the second Working Group Consultation.

Next steps

Activity	Date
Working Group Consultation	01 Feb 19 – 22 Feb 19
Panel considers Modification Report	15 Mar 19
Modification Report Consultation	18 Mar 19 – 08 Apr 19
Change Board vote (under Self-Governance)	24 Apr 19
Targeted implementation date	27 Jun 19 (June 2019 SEC Release)