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

Working Group Consultation responses

About this document

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

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	<p>While we still have some concerns about the length of time that it might take to raise and implement a change using the proposed new process, we believe that this process would still be a better alternative than the current process that would require a SEC Modification to be raised for each SSI change.</p> <p>As the new SSI Change Governance Process sits outside of the SEC it should be easier to adjust and amend this process in light of real world experience to ensure that it enables changes to be raised and progressed on a timely and cost-effective basis.</p>
Smartest Energy Ltd	Small Supplier	Yes	<p>This solution will make the change modification process more efficient and will allow the DCC to make improvements to the SSI fast enough to meet the changing needs of the needs of SSI users.</p>
SSE	Large Supplier	Yes	<p>This seems to cover the governance process, development of new requirements and how changes to the requirements will be documented and made available to Parties.</p> <p>We would like clarification on the following points for implementing changes to the SSI, as we could not see these covered in the proposed legal text/documentation:</p> <p>SSI Governance process</p> <p>Will there be controls in place about who can submit a SSI SIP to the DCC email address? Similar to nominated contacts for each organisation.</p> <p>What will be the lead time for DCC notifying Parties of SSI changes in each sprint before they are implemented? Will these schedules be available on SSI?</p> <p>Will the implementation of the SSI changes be outside of Parties core business hours?</p>

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Question 1			
Respondent	Category	Response	Rationale
Western Power Distribution	Network Party	Yes	We believe that the proposed solution will provide a more flexible, transparent modification process for changes to the SSI. It will allow users to raise requests and it will provide visibility of changes to industry via consultations.

Question 2: Will there be any impact on your organisation to implement SECMP0058?

Question 2			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	These will largely be business process impacts, in that we will need to have a mechanism for raising changes to the SSI via the new mechanisms, as well as responding to the consultations that will be issued in regards to proposed changes to the SSI.
Smartest Energy Ltd	Small Supplier	No	
SSE	Large Supplier	Yes	Minimal impact as this will relate to our internal communications to advise of the change in process to raise, impact assess proposed changes (SSI improvement consultation) and the subsequent development, approval and implementation.
Western Power Distribution	Network Party	Yes	Western Power Distribution 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 request any changes to the SSI.

Question 3: Will your organisation incur any costs in implementing SECMP0058?

Question 3			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	No	We do not expect that SECMP0058 will increase our costs; at the same time we do not expect this to present any cost reductions either.
Smartest Energy Ltd	Small Supplier	No	
SSE	Large Supplier	No	Minimal impact as this will relate to the communications required to advise of the change in process.
Western Power Distribution	Network Party	Unknown	The costs we will incur will include our share of the implementation costs as well as the ongoing costs to the review consultations. In addition we will incur costs that the DCC charge for additional work to produce and review the consultation documents as well as the changes that are designed, tested and implemented.

Question 4: Do you believe that SECMP0058 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
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> <p>For the avoidance of doubt we believe that the proposed solution is neutral against the other SEC Objectives.</p>
Smartest Energy Ltd	Small Supplier	Yes	<p>This modification better facilitates SEC Objective (a) as this modification will provide Users with an improved means of accessing DCC Services directly, including information which could be critical to resolving issues related to the provision, installation and operation of Smart Metering Systems.</p>
SSE	Large Supplier	Yes	<p>We agree with the Modification Report for the reasons given, that this would better facilitate General SEC Objective (b).</p> <p>We think that implementing this new process would better facilitate SEC Objective (g) in that it would enhance the existing process to have greater transparency on how to request and deliver changes to the SSI, as well as being clearer on the requirements associated with SSI and the introduction of the SSI Baseline Requirements Document.</p>

Question 4			
Respondent	Category	Response	Rationale
			Utilising this new process, if this Modification is implemented, could lead to SSI improvements that would better facilitate SEC Objective (a).
Western Power Distribution	Network Party	Yes	<p>We believe that this modification better facilitates SEC Objective (g) by facilitating the efficient administration and implementation of this Code.</p> <p>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.</p>

Question 5: Noting the costs and benefits of this modification, do you believe SECMP0058 should be approved?

Question 5			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	We believe that the proposed process represents an improvement, although not a significantly material one, over the current processes for making to the SSI.
Smartest Energy Ltd	Small Supplier	Yes	There are no costs to the DCC and the cost to SECAS is minimal
SSE	Large Supplier	Yes	This seems a reasonable approach to support greater flexibility, efficiency and agility to implement changes to the Self-Service Interface.
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>

Question 6: How long from the point of approval would your organisation need to implement SECMP0058?

Question 6			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	1 week	We would need a minimal amount of lead time to ensure that our operational processes, roles and responsibilities are aligned to the new process.
Smartest Energy Ltd	Small Supplier	N/A	
SSE	Large Supplier	As per consultation document.	This seems to provide sufficient time to support our internal communications on the changes to the process.
Western Power Distribution	Network Party	Flexible	We do not require a minimum time before this modification is implemented.

Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	We don't see any issues with the proposed implementation approach.
Smartest Energy Ltd	Small Supplier	Yes	June 2019 SEC release is the earliest SEC release that the modification can be implemented in
SSE	Large Supplier	Yes	
Western Power Distribution	Network Party	Yes	We believe that this modification should be implemented as soon as is practical.

Question 8: Do you agree that the legal text will deliver SECMP0058?

Question 8			
Respondent	Category	Response	Rationale
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text. We note, however, that while the original proposal was to remove Appendix AH from the SEC in its entirety, the current drafting retains a significant amount of content. We agree that obligations on SSI Users should remain in the SEC itself and not the new SSI Baseline Requirements Document, and assume that the sections that remain are less likely to need to change on an 'agile' basis and so would remain suitable to be changed through the SEC Modifications.
Smartest Energy Ltd	Small Supplier	Yes	The changes are minimal
SSE	Large Supplier	Yes	We would also expect to see references to the points we've raised for clarification, as per our response to Q1.
Western Power Distribution	Network Party	Neutral	We believe that there should be clarification around the DCC 'prioritising' SIPs. What will justify one SIP being prioritised over another?

Question 9: Please provide any further comments you may have

Question 9		
Respondent	Category	Comments
EDF Energy	Large Supplier	
Smartest Energy Ltd	Small Supplier	
SSE	Large Supplier	
Western Power Distribution	Network Party	