SEC
Smart Energy Code

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Paper Reference:	**SECP_67_1204_13**
Action:	**For Information**

Change Process Improvements update

1. Purpose

This paper provides a progress update on the delivery of improvements to the SEC Modification Process as discussed at the March Panel meeting. It also sets out the areas for improvement SECAS will be focusing on in the coming months.

2. Improvements delivered

Since the last Panel meeting, we have implemented the following changes:

2.1 Development Stage

The Development Stage is now in full swing and we have held conversations with a number of Parties about raising Draft Proposals. The process is still in its infancy, but we are already seeing the benefit of being able to focus the attention on clearly defining a problem statement.

The nominations for the Change Sub Committee (CSC) have concluded and the first introductory meeting is scheduled to take place on 8 April as planned. We are seeking nominations for the remaining seats to ensure each Party Category is fully represented.

2.2 Working Groups

We have scheduled the new monthly Working Group meetings to take place on the first Wednesday of every month. We have also started batching modifications for those meetings based upon the timelines agreed at last month's Panel meeting. The first meeting will be on 1 May (April's meeting was cancelled as the DCC's assessments were not returned in time).

We suggest that the Panel review the Working Group's Terms of Reference after that first meeting.

2.3 Transparency

Last month we presented the Panel with a series of shorter, more detailed timetables for each modification, moving away from high-level blocks of time representing the whole Refinement Process. The modification pages on the website have been updated to reflect these more detailed timetables. We have also updated the Modification Register to highlight the timetables, whilst introducing additional improvements to make the register easier to search and provide clearer information on each modification's progression.

Modcasts have been launched, providing a snapshot of the latest modification information. These will evolve, but we have already received positive feedback from Parties.

The Change Status Report has also been reviewed and updated to align it to the new ways of working. The new report will be presented to the April Panel meeting and we would appreciate any feedback the Panel may have.

2.4 Improvements over the next month

Over the next month we will continue to focus on providing clearer guidance on the Modification Process to Parties. To this end, we will be presenting an overview of the process to each Sub-Committee, highlighting how and when the Sub-Committees will input into the wider process.

We will continue to develop an updated impact matrix to assist Parties in identifying those changes they are most interested in, to assist them in better responding to our consultations. We will also be rolling out a more dynamic consultation response process that will allow Parties to see responses as they come in, rather than waiting until the end of the consultation window.

3. Next workstreams

To follow on from the improvements already made, and to address the feedback received, we will progress the following workstreams this quarter.

3.1 Releases process

The delay in the DCC Cost Benchmarking Study exercise has pushed back the consequential changes to the Release Management Policy, but this will be a focus over the coming months. In the interim we are working closely with the DCC to draft joint working practices that clearly set out what information should be available, and when, throughout the lifecycle of a change. We are also bedding in the new processes to the Development and Refinement stages, which we hope will result in a quicker turnaround of DCC Assessments. Pending the outputs of the DCC Cost Benchmarking Study, we will bring an updated plan to the Panel in May.

3.2 Power to withdraw

One of the frustrations raised by multiple Parties was that the SEC does not provide any power for SECAS, the Panel or the Change Board to withdraw modifications from the process. The primary concern raised is that a lot of time, resource and cost is put into modifications that are not going to progress or are unlikely to be implemented.

The improvements we have made to the process attempt to nullify this risk. The introduction of the Development Stage helps ensure modifications are fully thought through and supported before they progress. Equally, seeking Change Board approval prior to incurring the cost of a DCC Impact Assessment has sought to prevent nugatory costs and effort during the Refinement Process. However, these steps are preventative measures and can only go so far, especially since the preventative steps under the SEC rely solely on the Proposer acting on the views of the CSC or the Change Board.

We will present a paper to the Panel in May outlining some possible improvements in this area. If there is appetite to explore the issue further, we will begin to engage with the CSC in June.

3.3 Subsidiary Documents and Configuration Management

We have received several comments relating to the complex nature of the SEC and its supporting documentation, both in terms of its drafting and that the document management approach, inherited by SECAS.

To help address this situation we are going to explore the use of subsidiary documents within the SEC. Subsidiary documents are used elsewhere in the industry to categorise types of documentation so that similar processes and regulation can be grouped together. This makes it easier to find relevant information, but also to apply appropriate governance arrangements for each type of document.

The SEC currently does not make use of subsidiary documents but, given the granular level of technical information set alongside higher-level regulation, it seems sensible to consider a different approach. The SEC also has 40 Appendices. Applying a framework with subsidiary documents could reduce the number of appendices and allow us to collate information in a more logical manner.

We also wish to investigate the configuration management approach applied to the SEC. The complexities of the GB Companion Specification (GBCS) and versioning of the Technical Specifications cause confusion amongst Parties and make simple changes difficult to implement. There are other examples of complex documents in the industry (for example Settlement Codes of Practice) which are managed in a robust yet simple way. We will investigate and see if there is another more appropriate way to manage these documents and will report our findings to the Panel.

4. Recommendations

The Panel are requested to:

- **NOTE** the contents of this paper.

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SECAS Team

5 April 2019