

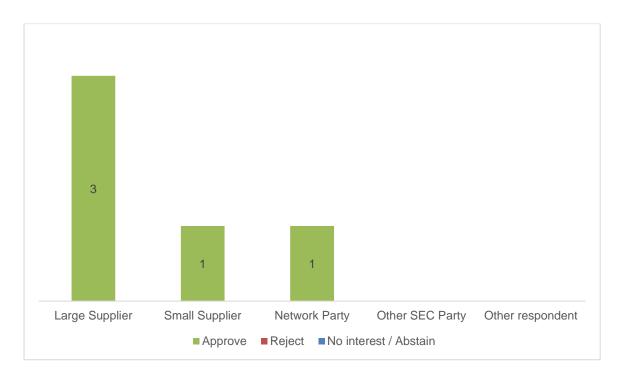
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SECMP0058 'Changes to the governance of the Self-Service Interface'

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the SECMP0058 Modification Report Consultation.



Summary of responses



Question 1: Do you believe that SECMP0058 should be approved?

Question 1					
Respondent	Category	Response	Rationale		
Smartest Energy Ltd	Small Supplier	Approve	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.		
EDF Energy	Large Supplier	Approve	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.		
			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.		
			For the avoidance of doubt we believe that the proposed solution is neutral against the other SEC Objectives. This includes SEC Objective (a) – while this change will make it easier to amend the SSI in a way that enables more efficient operation of smart meters, it does not directly deliver that benefit on its own.		
British Gas	Large Supplier	Approve	We are supportive of SECMP0058 being implemented as implementation will support the achievement of the General SEC Objectives (b) and (g).		
Npower	Large Supplier	Approve			
Western Power Distribution	Network Party	Approve	We believe that this modification should be approved as the costs are minimal and the proposed solution will provide a more flexible, transparent modification process for changes		





Question 1					
Respondent	Category	Response	Rationale		
			to the SSI. It will allow users to raise requests and it will provide visibility of changes to industry via consultations.		
			We believe that this modification better facilitates SEC Objective (g) by facilitating the efficient administration and implementation of this Code.		
			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.		







Question 2: Please provide any further comments you may have

Question 2					
Respondent	Category	Comments			
Smartest Energy Ltd	Small Supplier	N/A			
EDF Energy	Large Supplier	We are disappointed that the proposed timescales for making changes to the SSI under the new process are not shorter; although we recognise that this is because of the need for consultation with industry. Also, an appropriate level of control is required, especially in regards to approval of expenditure by DCC on any changes. While we believe that the benefits of this change are not as significant as they could be, it still represents an improvement on the current process.			
		We are not sure that it is accurate to say that the DCC costs associated with this change are effectively zero – some cost must have been incurred by DCC in creating the new SSI Baseline Requirements Document. It would be useful to understand what these costs were and how these will be recovered – otherwise the true costs associated with making this change will not be clear.			
		Should this change be approved we believe that some form of post-implementation review should be undertaken to determine whether this change has resulted in the outcomes predicted.			
British Gas	Large Supplier	We agree with the proposer that there are process benefits from removing low-level detail from the SEC and into a new, DCC controlled, document. This is consistent with other SEC related documents where the low-level detail does not need to appear in the SEC. This will allow for a more efficient change process in future with more appropriate level of governance in place.			
Npower	Large Supplier	None			
Western Power Distribution	Network Party				

