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SEC Change Board Meeting 17_1904

18th April 2018 10:00 – 11:00

8 Fenchurch Place, London, EC3M 4AJ

Final Minutes

Attendees:

Category	Change Board Members
Change Board Chair	David Kemp
SECAS Modifications Support	Selin Ergiden
Large Suppliers	Jonathan Hawkins
	Stacey Brentnall
	Graham Wood (<i>Teleconference</i>)
	Rachael Mottram (<i>Teleconference</i>)
	Sam Cannons (<i>Teleconference</i>)
	Paul Saker (<i>Teleconference</i>)
	David Smith (<i>Teleconference</i>)
	David Rodger (<i>Teleconference</i>)
Small Suppliers	Steven Bradford (<i>Teleconference</i>)
	Karen Lee (<i>Teleconference</i>) – alternate for Carolyn Burns
Networks	Jeremy Meara (<i>Teleconference</i>)
	Paul Fitzgerald (<i>Teleconference</i>)
	Shanna Key (<i>Teleconference</i>)
Other SEC Parties	Elias Hanna (<i>Teleconference</i>)
	Mike Woodhall (<i>Teleconference</i>)
	Gerdjan Busker
Representing	Other Participants
BEIS	Christopher Thompson
Ofgem	Raymond Elliot
DCC	Amanda Rooney

1. SECCB_17_1804_01 – SECMP0002 ‘Add New Command to Reset Debt Registers’

SECAS provided the Change Board Members with the Final Modification Report (FMR), the Draft Legal Text and the Modification Report Consultation (MRC) Responses for SECMP0002.

Change Board Vote on SECMP0002:

The Change Board unanimously voted to recommend **REJECT** SECMP0002. The voting outcome is shown below:

Party Category	Approve	Reject	Abstain
Large Suppliers	0	8	0
Small Suppliers	0	2	0
Networks	0	2	1
Other	0	3	0

The majority view of the Change Board is that SECMP0002 will better facilitate Objectives (a)¹ and (c)² whereas the rest of the Members noted that this modification could better facilitate those Objectives, but were unclear whether it did so demonstrably better than the current baseline.

The unanimous view of the Change Board is that the cost associated to implement this modification outweighs the benefits, and therefore this modification should be rejected. One Large Supplier member also noted that there is no business case for SECMP0002. They noted there are different ways to achieve the same outcome, and implementation of this modification would impact customer journey and create additional complexity.

One Network member abstained as they did not believe that this modification has an impact on Gas Transporters. Another Network member noted the DCC costs are becoming barriers to implementing changes.

An Other SEC Party member raised the point that the time it has taken to get this modification to the Change Board voting stage was long, noting that the industry has spent two years developing and agreeing on a solution, only for it to be rejected on the ground of costs. If more information on the likely costs had been known much earlier, they felt the Working Group could have checked these and potentially avoided the work altogether, enabling this time and effort to be spent elsewhere. SECAS informed the Change Board that it is currently considering this subject as part of the Section D Review.

The Change Board:

- **CONSIDERED** the FMR, Draft Legal Text and MRC responses;
- **AGREED** that the FMR should not be returned to the SEC Panel;

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

² Facilitate Energy Consumers' management of their use of electricity and gas through the provision to them of appropriate information by means of Smart Metering Systems

- **VOTED** that SECMP0002 should be **REJECTED**; and
- **PROVIDED** rationale as to why the Modification Proposal should be rejected.

2. SECCB_17_1804_02 – SECMP0029 ‘Business Continuity and Disaster Recovery Testing Amendments’

SECAS provided the Change Board Members with the FMR, the Draft Legal Text and the MRC Responses for SECMP0029.

The Change Board discussed the current drafting of the Legal Text and highlighted a number of amendments that they believe needs to be made. This discussion was guided by one of the responses received to MRC.

The Change Board members agreed that the consultation on the Business Continuity and Disaster Recovery testing referenced in proposed SEC Section H10.12A should be completed prior to the notification being issued. If the consultation does not close, and the responses, decisions and other related documentation are not provided to Parties prior to the notification, there would be little point in the consultation. It was highlighted that this was the intent of the legal text, but clarification should be made to ensure this was clear.

SECAS confirmed that this is a minor and non-material clarification change and could be made at this stage of the Modification Process.

The members discussed whether the title of SEC Section H10.11 should be read as ‘test’ as opposed to ‘tests’.

The DCC Representative responded to this comment, noting that the reason it is read as ‘tests’ is there are a number of steps/tests within one BCDR testing procedure, and some of those tests are carried out on different dates. They also informed the members that this area is one of the questions that DCC would look to include in the consultation.

Following discussions, Change Board members agreed to leave it as ‘tests’.

The Change Board discussed the term in brackets (‘or, where it is not reasonably practicable to give 60 Working Days’ advance notice, as far in advance as is reasonably practicable’) in proposed SEC Section H10.12B. It was discussed whether this sentence in brackets should be removed, as there is no reason why 60 Working Days’ notice cannot be provided by the DCC.

One Change Board member, who had been on the Working Group, highlighted that this clause had been introduced to cover any rescheduling that may be required after the original plan had been approved. They noted the example that, during testing, it may be identified that an additional weekend of outage may be needed due to issues with the tests. In this scenario, Suppliers would have less than 60 Working Days’ notice of this change of plans. It was always the intent that the original notification would be given at least 60 Working Days before the event.

A member raised the question that Suppliers may potentially have to reset their consumers’ expectations of an outage, especially prepayment customers, due to changes in the plan. It is therefore sensible to have this as a codified or defined parameter. This point was raised because the current drafting could be interpreted as saying Parties may not have 60 WDs notice; it does not mention that this point was introduced specifically in relation to rescheduling once the original plan has been notified. It also does not state how much time the Suppliers may have to give to their consumers if the testing is delayed and rescheduled.

One member put forward a view concerning the issue identified and the proposed solution, noting that the solution agreed by the Working Group did not appear to meet the original intention of this modification. The issue identified within the Modification Proposal was around the loss of Service Requests, and this modification currently does not deliver a solution for that issue. Instead, this modification requests that Suppliers do not send consumer driven Service Requests during a BCDR test, which does not provide any level of protection. Also, in a scenario where Ofgem's automated switching program is implemented, since such Service Requests would be automated, Suppliers will not have any visibility of these being sent, and these would not be cached; hence Suppliers will have no control over them. Therefore, considering these points, the member stated that they are not sure if the current solution is a solution to the actual problem identified.

The Proposer Party's representative responded to comments made and agree it would be beneficial to take this modification back to the Working Group to introduce any clarification into the legal text. However, the member also believed that this modification, as it stands, will help Parties and DCC through the BCDR testing process, and fill the gap that currently exists, and therefore believes that this modification should be progressed to a decision as soon as possible. They noted that this had been discussed by the Working Group in conjunction with DCC, and it had been agreed that this was the most effective solution that could be implemented at this time. As Proposer, they were content with the solution developed.

It was felt that making such changes to the legal text at this stage would constitute a material change. The Change Board therefore agreed to send this back to Refinement Process to be discussed and developed further by the Working Group. Members requested that the Working Group should ensure that the legal text clearly delivers the intent of the solution with no ambiguity.

The Change Board also requested the Working Group to discuss this and finalise the points as soon as possible, to prevent this modification from being delayed any further.

Change Board Vote on SECMP0029:

The Change Board unanimously agreed to send this modification back to the WG for further consideration, in order to clarify the issues stated during the meeting (especially relating to the legal text).

The voting outcome is shown below:

Modification to be returned to the SEC Panel			
Party Category	Approve	Reject	Abstain
Large Suppliers	8	0	0
Small Suppliers	2	0	0
Networks	2	0	1
Other	3	0	0

The Change Board:

- **CONSIDERED** the FMR, Draft Legal Text and MRC responses; and
- **AGREED** that the FMR should be returned to the SEC Panel with a recommendation for further clarification to be made on the legal text.

3. SECCB_17_1804_03 – Modification and Release Status Report

The Change Board noted this months' Modification and Release Status Report. There were no further comments received.

4. Any other business

There were no further comments or any other business raised.