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Sub-Committee input during the Modifications Process

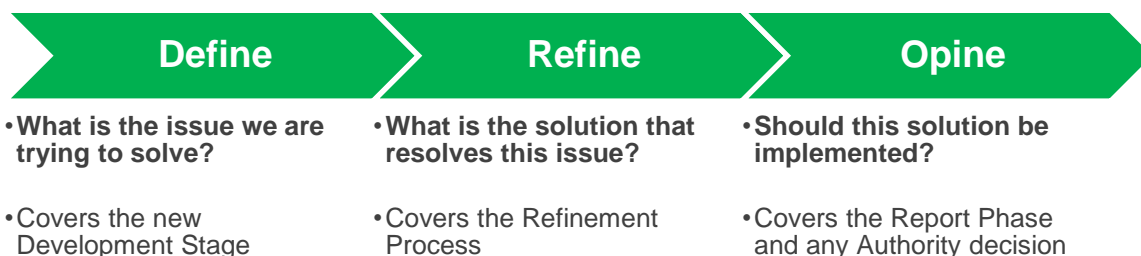
1. Purpose

This paper, which is being presented to the Operations Group (OPSG), the Security Sub-Committee (SSC), the Technical Architecture and Business Architecture Sub-Committee (TABASC) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA), summarises the framework for assessing Draft Proposals and Modification Proposals and how we intend to seek these Sub-Committees' input into their development going forward.

We have been introducing changes to the SEC Modifications Process to improve the framework and enhance our services around this in response to customer feedback. Our new approach will see greater and earlier input sought from the SEC Panel Sub-Committees during this process. This allows for valuable expert insight to be identified and obtained at earlier points, potentially saving time and effort that could otherwise have been spent developing and assessing unfeasible or unsupported proposals.

2. The stages of the framework

[SECMP0049 'Section D Review: Amendments to the Modification Process'](#), which was implemented on 4 March 2019, introduced the new Development Stage into the SEC Modification Process. The introduction of this stage means there are now three distinct phases to the framework for assessing and developing a change and deciding whether it should be made, each looking at a core question:



Any proposal raised will advance through these stages, with each core question needing to be answered before the change can pass the 'gateway' to the next stage. This ensures a proposal evolves and develops in a more structured and effective manner.

The framework and associated timescales are designed to be flexible. Each proposal's progression will be assessed on a case-by-case basis depending on the complexity of each issue raised or the subsequent solution, and regular progress updates will be provided to the Panel. A summary of the key steps in each stage can be found in Appendix A.

In planning for each stage in the framework, opportunities for reducing the required elapsed time will be sought, consistent with ensuring the necessary work is completed. Going forward, we will be placing a much greater emphasis on 'Proposer ownership' of the issue and solution, with clear windows for industry comment before the Proposer has the final say. This is expected to reduce the time currently spent needing to reach a consensus at each step. Furthermore, not every proposal will need to undergo every step in the framework, and some proposals with clear solutions may not need to undergo the 'Refine' stage and could proceed straight from 'Define' to 'Opine'.

3. Sub-Committee input during a proposal's lifecycle

The OPSG, the SSC, the TABASC and the SMKI PMA provide a wealth of expertise in their relevant areas, and we feel we have under-utilised this in the past. As part of our move to the new framework, we will be enhancing the input these Sub-Committees have on the development of a proposal, and for this to be obtained in a more structured and consistent manner.

In line with the Code Administration Code of Practice (CACoP),¹ any solution developed under a Modification Proposal is 'owned' by the Proposer. It is up to them to determine the solution that is ultimately taken forward for decision. The SEC allows Alternative Solutions to be raised if Parties disagree with the Proposer's solution and want to put forward different options; such solutions would be developed under the same modification but would be 'owned' by a separate sponsoring Party.

However, we would expect any Proposer to take on board comments and feedback provided by Sub-Committees in developing their solutions. If they do not, they risk their solution being rejected at the end of the process should any risks, concerns or issues raised not be properly mitigated.

The sections below provide an overview of each stage in the framework and how we intend to seek input from the OPSG, the SSC, the TABASC and the SMKI PMA during these.

This paper does not cover the SEC Releases process and the associated testing that follows the approval of a Modification Proposal. We will cover this separately at a future date, once more detail on an enduring process has been developed with the DCC, which will also be where we engage with the Testing Advisory Group (TAG).

3.1 Define: input during the Development Stage

Purpose of this stage

The intent of this stage is to ensure the problem, issue or defect identified by the Proposer is defined and understood before any solutions are developed. By first ensuring the problem is known and understood, effective solutions can then be developed that can be shown to resolve it. It also ensures everyone is working from the same understanding of the issue when assessing the merits of these solutions.

¹ CACoP Principle 6 'A Proposer of a Modification will retain ownership of the detail of their solution' states that "to ensure that a Modification is developed in the way which the Proposer intends, the Proposer will keep control over the detail of their solution. Other individuals or Workgroups cannot amend the Modification."

As part of this stage, we will also assess the scale of the problem and the impact it is having. This would inform the business case for spending time in developing a solution and would provide a baseline in the case for change made at the end of the process.

This stage is overseen by the Change Sub-Committee (CSC), who are responsible for ensuring the problem statement is fully understood. Only once the CSC are happy this is the case will the Draft Proposal be presented to the Panel to be converted to a Modification Proposal and sent to the next stage. The three main areas the CSC will ultimately need to ensure have been covered are:

- the problem that has been raised is fully defined and understood;
- the impacts that this issue is having are assessed, including the scale of the issue and the impacts on Parties of doing nothing; and
- the part(s) of the SEC that this issue relates to is identified.

In completing this assessment, we will engage with the DCC, the relevant Sub-Committees and any Parties and other organisations such as manufacturers (including representatives for any groups) likely to be affected by the issue, and to ensure a full and robust assessment is carried out. There will also be opportunity for any affected organisation to comment during this stage.

The introduction of this stage, with the early involvement of Parties and the Sub-Committees, gives the opportunity for robust challenge and valuable insight to be provided at an early point. This then has the potential to save time and effort further down the track that could otherwise have been spent developing and assessing unfeasible or unsupported proposals.

Input sought from Sub-Committees

Each month we will present the OPSG, the SSC, the TABASC and the SMKI PMA with a short paper summarising the new Draft Proposals that have been raised. At this point, all the Proposer will have submitted is the problem or issue they have identified and the impact this is having on them. We will also provide any further assessment on the issue and impacts that we have completed by this time.

Here, we will be seeking any thoughts or views on the issue raised and its impacts from each Sub-Committee, and whether this proposal is one the Sub-Committee believes warrants further input from them during this stage. We would not be seeking views on solutions at this time. Any views from the Sub-Committees will be fed back to the Proposer and considered as part of the Draft Proposal's assessment.

Should further input be needed from a Sub-Committee during this stage, we will return at future meetings as required.

All comments received from Sub-Committees will be captured in a 'live comments' document on the proposal's webpage on our website, along with the response from SECAS or the Proposer. At the end of this stage, the comments received from Sub-Committees and the responses to these will be summarised in the final problem statement submitted to the CSC for sign-off.

3.2 Refine: input during the Refinement Process

Purpose of this stage

The purpose of the Refinement Process is to assess and develop solutions to the identified issue. By agreeing the problem first, this stage can then focus exclusively on the solutions that resolve this, and

better ensures that the solution developed is the most effective. Any solution developed must be shown to resolve the defined problem.

The first part of this stage will involve SECAS, the Proposer and, where it impacts them, the DCC developing the business requirements, which will be based on the agreed problem statement. Once the business requirements have been agreed, one or more solution options will be identified and developed.

Input will be sought from the Sub-Committees as required in shaping the business requirements and solution options – it is better to find out whether a solution would, for example, fundamentally undermine the security architecture before a large amount of time is spent assessing it. There will also be opportunity for all SEC Parties to review and comment on these. Where relevant, we will also carry out a DCC Preliminary Assessment based on the agreed requirements.

Following completion of this work, the second half of this stage seeks wider industry assessment of the solution options developed and their impacts. We will begin by discussing the modification at a monthly Working Group meeting. The purpose of this session is to allow Parties to review and comment upon the strawman solution(s) developed for each modification, to ensure that they are fit for purpose, before the detailed assessment is undertaken.

If participants are satisfied with the solution that has been developed, an industry consultation and, where relevant, a DCC Impact Assessment can then be carried out, to understand the full impacts of this change on Parties and the DCC.

If the Working Group or the industry consultation raises concerns, work will need to be carried out first to further refine the solution, which may require repeating previous steps. Otherwise, the Modification Report is presented to the Panel for sign-off.

Input sought from Sub-Committees

Each month we will include in our paper a summary of all the Draft Proposals that have been converted to Modification Proposals. At this stage, the problem, the impacts it is having and the context of the issue within the SEC will have been agreed, and work on the business requirements will be at an early stage. We will also provide our assessment of which Sub-Committees we believe will need to provide further input during this stage, drawing upon the discussions from the Development Stage.

In considering this paper, we will be seeking any views from each Sub-Committee on the risks to be considered or areas that need to be accounted for when developing solutions; for example, would there be likely security implications arising from this, or any impact on systems or business processes that needs to be carefully considered. Any views on alternative approaches can also be raised for consideration. As with the Development Stage, any comments received from any Sub-Committees and the response from SECAS, the DCC or the Proposer will be captured in the 'live comments' document on our website. We will also agree whether or not the Sub-Committee needs to be further engaged on this Modification Proposal.

Should further input be needed from a Sub-Committee, we will return as we develop the business requirements, to seek feedback and comments on these for the Proposer's consideration. Sub-Committees are also welcome to submit a response to the industry consultation issued later on during this stage, though we would hope to have identified and responded to all their concerns before this point.

All comments and discussions from Sub-Committees across the whole process and the responses to these will be clearly highlighted in the Modification Report produced at the end of this stage. We will also flag any outstanding concerns or reservations from any Sub-Committees, so these can be taken into account during the final decision-making stage.

Implementation approach

We also see a role for the OPSG and the TABASC in inputting to the implementation approach for a modification. This is to ensure effective alignment of changes is achieved, minimising the input on Users in having to upgrade or amend their systems or business processes.

For DCC System impacting modifications, the earliest point an implementation approach can be put forward is following the receipt of the DCC's Preliminary Assessment, as this is the first opportunity to assess the expected lead time. This date is further reviewed as Party lead times are gathered during the subsequent industry consultation and the views of the OPSG and the TABASC obtained. For other modifications, an initial implementation date could be assessed earlier in the stage. The implementation approach is ultimately approved by the Panel when they sign off the Modification Proposal to proceed into the Report Phase.

When developing the implementation approach, we will consult with the OPSG and the TABASC on which SEC Release the solution would best fit into. As part of this, the priority of the change and the business benefit will need to be assessed, so the best balance can be established. The Sub-Committees' feedback will be highlighted as part of the proposed implementation approach ultimately presented to the Panel for approval.

3.3 Opine: input during the Report Phase

Purpose of this stage

This final stage of the process focuses on determining whether the change should or should not be made. When a modification reaches this stage, the solution(s) is fixed, the implementation approach (if approved) is set, and we focus on the final decision.

An industry consultation is carried out on the Modification Report, seeking industry views on whether the change should be made. The Change Board are then presented with the Modification Report and the consultation responses and will vote on whether the modification should be approved or rejected. If the modification is Self-Governance, this vote forms a decision; otherwise, it forms a recommendation to the Authority, who will make the final decision.

If the modification is approved, it is then implemented in line with the implementation approach approved by the Panel when they signed off the Modification Report.

Input sought from Sub-Committees

No further input will be sought from the OPSG, the SSC, the TABASC or the SMKI PMA during this stage, though Sub-Committees are welcome to submit a response to the Modification Report Consultation.

4. Recommendations

The TABASC are requested to **NOTE** the contents of this paper.

David Kemp

SECAS Team

9 May 2019

Appendix A: key steps in each stage

The diagram below summarises the key steps during each of the three core stages of the framework. Not every proposal will need every step (e.g. no DCC Assessments are needed for a proposal that does not impact on DCC Systems), and some proposals may not need to undergo the 'Refine' stage at all.

