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Action:	For Discussion

SEC Document Management

1. Purpose

This paper identifies a number of areas where improvements could be made to the SEC document management approach as outlined in the SEC. It provides a high-level summary of each area and requests the Panel to consider these areas, and any additional areas, for review. Following this meeting, we will develop a detailed plan for progressing the identified improvements for approval.

2. Improving SEC Document Management

We have identified a number of improvements that can be made to the document management approach in the SEC. Following the recent reviews of the Modifications Process and the Release Management Policy, coupled with the approaching end of the transition phase, now seems a prudent time to amend the framework for the enduring SEC.

Summarised below are areas of document management we believe it would be beneficial to review. The Panel are asked to provide comments on these areas and highlight any other issues they would like us to explore.

2.1 Version control

Version control ensures you can identify one version of a document from another, making it clear when and why a document has been updated. It provides a clear audit trail allowing Parties to track changes and identify when key decisions have been made. Version control is therefore incredibly important for a document like the SEC, that contains obligations and technical information and is constantly subject to change. The current SEC version control methodology does not deliver the objective of version control.

The SEC is made up of 80 individual documents, yet it is treated as though it is one document. If a single section of the SEC is updated, then all Sections, Schedules and Appendices increase in version number. This makes tracking changes to specific sections difficult, and it is harder for Parties to easily see what has been updated as part of a Release. To add additional complexity, not all SEC documents are treated in the same way. Some documents (e.g. the Technical Specifications) contain their own version numbers outside of the main SEC versioning. This makes it even harder to identify when changes have happened to a specific document.

Complicating matters further is how new version numbers for the SEC are recorded. The current approach means the first modification to be implemented in a calendar year increases the version of all SEC documents by one integer number i.e. v1.0 to v2.0. The next change to be delivered in the

calendar year then increases the version by a fraction value i.e. v2.0 to v2.1. This can cause confusion for Parties as it appears there are two types of change: those that increase integer numbers, and those that increase fraction numbers. In practice, the only difference is when in the year the changes were implemented. This adds unnecessary confusion, since versions of documents identified by fractional increases should be reserved for those in draft and not for approved documents.

To help simplify tracking amendments to SEC documentation, we believe there would be benefit in treating each SEC Section, Schedule and Appendix as a separate document, providing each with its own version number. A complete version history for each SEC document would be created showing when and why it had been amended.

We would also recommend introducing a more conventional approach of version numbering. Removing complexity around when in the year a change was implemented and simply having each approved change to a document increasing its version by a whole integer number. Fractions would only be used when issuing draft documents for review.

2.2 Document categories

As noted above, the SEC consists of 80 individual documents (18 Code Sections, 39 Appendices and 23 Schedules). This can be a rather overwhelming number of documents to a new entrant. Even for those established in the market, the sheer number of documents does not make navigating the Code any easier. One of the main reasons the SEC can feel bewildering, is that all of the documents are treated and labelled the same; there is no immediate way to differentiate the purpose of each document (e.g. a form or a detailed functional specification).

We believe there would be benefit in introducing document categories into the SEC. This would allow documents that serve a similar purpose or function to be grouped together (e.g. all forms grouped as a set of documents). This would allow the introduction of clear subsidiary documents within the SEC, an approach that has been used to great effect across other industry Codes. It would also remove the need to continually add Appendices to the SEC.

Creating document categories would also allow suitable governance arrangements to be brought into place for individual documents or entire categories. For example, you could mandate that any updates to Appendix L 'SMKI Recovery Procedure' should be reviewed by the SMKI PMA before Panel approval. Equally, it could be that any changes to Appendix L are delegated to the SMKI PMA to approve via another mechanism that is not a Modification Proposal. This is not to say that this is the correct course of action, however it provides an example to illustrate that robust, yet proportionate, governance can be introduced by categorising documents.

2.3 Technical Specifications

When seeking views as part of the Modifications Process review, we received feedback from several Parties noting the complexity of the rules regarding the Technical Specifications. It was felt that the provisions relating to applicability periods of different versions could be simpler, and a similar approach to those applied to Metering Codes of Practice could be used.

There have also been discussions at the Panel regarding the transparency of the rules for updating Technical Specifications which resulted in guidance being drafted. We believe there would be benefit in exploring the current provisions to see if they can be made clearer and potentially replaced with a more suitable set of arrangements.

2.4 Ease of use

Having reviewed the content of several SEC documents, we believe we can reduce the number of these by combining similar provisions spread across a number of documents into a single place. There are also sections that contain duplicated obligations. These could be streamlined to reduce the volume of text in certain sections, making the Code more accessible.

We also believe that it is important to use plain English as much as possible. Much of the SEC has been written in complex language and is often impenetrable due to the style of writing. Reviewing the SEC documents to remove unnecessary complex statements and superfluous legal terminology, and simplifying cross references would help existing Parties and new entrants to more easily understand their obligations and the SEC framework.

2.5 Document Log

We believe a SEC Document Log would be useful to help Parties quickly identify when changes have occurred in documents that are important to them, and to clearly see the latest version of SEC documentation. Currently, a “statement of live SEC documents” is produced. Amending this document into a more user-friendly format, and potentially including better information on document status and history, could make it a useful document for Parties to follow the changes to the SEC and explore previous updates at their leisure.

2.6 Redline text

Depending on the size and scope of a Modification Proposal, reviewing the associated redline text can be a difficult task for Parties. Whilst we cannot remove the need for such a review, we believe it would be useful to publish some principles of how we issue redline text, so that Parties can guarantee a consistent approach and know what to expect from a review. This guidance would also include information on the “developing SEC” that sets out the legal text changes for all approved Modifications and how that can be used by Parties to better understand upcoming changes.

3. Next steps

We welcome comments from the Panel on the areas set out in section 2 above, and any other related areas identified as part of discussions. We will take on board any comments and produce a detailed work plan setting out our planned approach and estimated effort in delivering the above improvements. We will bring this back to the Panel for approval at the August Panel meeting.

4. Recommendations

The Panel are requested to:

- **PROVIDE** any comments and further areas for review regarding SEC Document Management; and
- **AGREE** the next steps for this work.

Adam Lattimore

SECAS Team

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