

SEC Release Management Policy Consultation responses

About this document

This document contains the full non-confidential collated responses received to the SEC Release Management Policy Consultation.

Question 1: Please provide any comments you may have on the updated SEC Release Management Policy.

Question 1		
Respondent	Category	Comments
EDF Energy	Large Supplier	<p>As a high-level policy regarding SEC Releases the content of the SEC Release Management Policy seems fine – it is likely that the actual process of agreeing and implementing a SEC Release (and especially a SEC Systems Release) will be much more complicated than this policy would indicate.</p> <p>The SEC Release Management Policy does not make any reference to the consequential impacts that might arise from any SEC Systems Release, and specifically any Release that compromises new versions of the DCC User Interface Specification (DUIS), the GB Companion Specification (GBCS) or the Technical Specifications.</p> <p>Implementing a SEC Systems Release not only involves creating new versions of those documents, and setting the Installation/Maintenance Validity Period start dates; consideration will also need to be given to whether previous versions of documents will need to be removed or end dated, or Installation/Maintenance Validity Period end dates set. In the absence of this information SEC Parties will not know whether or when they are required to implement a particular SEC Systems Release, which will be critical to understanding the impacts of any Release.</p> <p>Consideration of the impacts of new versions of DUIS/GBCS/Technical Specifications on the existing versions needs to be part of the consideration for any SEC Systems Release, and therefore part of the SEC Release Management Policy.</p>
Npower	Large Supplier	No comment.
SSE	Large Supplier	We are generally supportive of the content and the format of the updated SEC Release Management Policy. Our specific comments on the content are set out below.

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		<p>Section 5 – Contents of the Release Implementation Document</p> <p>In SEC Section D13.13 (c) the RID “defines how the DCC shall report progress towards readiness;”, however it does not seem clear where this would be reported when looking at the current list referenced in this section of the RMP.</p> <p>On a separate note for SECAS, we believe SEC Section D13.13 is a typo and may be one to add to the SEC housekeeping log - D13.13 directly follows D10.12 in SEC v6.17.</p> <p>Section 6 – SEC Release Testing Approach Document</p> <p>The paragraph currently sets out: “The TAD should be issued to the TAG for review at least nine months preceding the go-live date of a SEC Release. The TAD should be finalised and published for all Parties at least six months prior to the go-live date of a release. These dates are a minimum requirement and should not be seen as the standard approach.”</p> <p>We believe this should read:</p> <p>“The TAD shall be issued to the TAG for review at least nine months preceding the go-live date of a SEC Release. The TAD shall be finalised and published for all Parties at least six months prior to the go-live date of a release. These dates are a minimum requirement and should not be seen as the standard approach.”</p> <p>Section 7 – Release cost</p> <p>This section should include the costs for System Capacity Testing (where appropriate).</p>
SMS Plc	Other SEC Party	N/A
DCC	DCC	Thank you for the opportunity to comment on the SEC Release Management Policy.

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		<p>DCC plays a central role in the delivery of system impacting SEC Releases and it is important that the Policy document is well drafted and reflects a process and governance framework that allows the most economic and efficient delivery of system impacting change, in accordance with the Second General SEC Objective, which in turn enables DCC to deliver against its General Objectives in the DCC Licence.</p> <p>We offer the following observations and queries in relation to the draft Policy document.</p> <p>1. We would welcome greater clarification on the proposed role of SECAS in as a project manager for SEC Releases (page 5), especially in relation to System Impacting SEC Releases. For example:</p> <ul style="list-style-type: none"> • what decision-making powers would be granted (if any) to SECAS in this role and by whom? • to what extent is this role budgeted for under code administration? • how does the role of the administrator acting as a project manager dovetail with the planning and coordinatory role undertaken by DCC in delivery system changes? • how far would the project manager role extend? Would SECAS expect this role cover service providers, their subcontractors, or other roles? • what is seen as the potential benefit of extending the SECAS role as described? <p>We would observe that, as a Licenced entity in the energy market, DCC must always consider its General Licence Objectives in the context of any specific commitments relating to change delivery, and we would seek assurance that any project management role undertaken would take this into consideration.</p> <p>2. In relation to the SEC release cycle, DCC requests that the SEC Release Management Policy Document is amended to include a clear mechanism for considering and governing possible changes to release date. Managing the central systems in any SEC System Change is one part of DCC's mandated business, and there may be circumstances where concurrent delivery activity outside of the SEC, conflict with a SEC</p>

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		<p>Release and it would be more economic and efficient to move the release date (not only for DCC, but also for other energy market participants, who are also managing a complex framework of change). DCC would suggest that the Panel is given a role to consider requests to amend the date if proposed by a SEC Party.</p> <p>3. Related to the point above, in instances where there are small changes to dates which move a Release to a different calendar month, we suggest that SECAS consider amending the naming convention to avoid confusion (for example, Summer, Autumn and Winter as opposed to June, November and February releases).</p> <p>4. Regarding Implementation Dates for Modifications (Section 4). Whilst DCC fully supports the inclusion of a mechanism for amending of implementation dates for modifications, we query whether the process as described is agile enough to manage in circumstances where it may be necessary to revise the scope of a release at relatively short notice. This may be necessary in cases where User and/or DCC testing of certain capability is not complete, and it is more efficient and economical to remove capability associated with a Modification as opposed to amending the overall Release Date.</p> <p>5. In Section 6, DCC recommends the addition of provisions that allow the Testing Approach Document to be amended, in consultation with SEC Parties and/or TAG. There may be circumstances where new testing requirements have been identified and/or new testing processes may make testing more cost-effective.</p> <p>6. DCC requests that the date for submission of release actuals in Section 7 of the document is set at 3 months after the release, as opposed to 2 months. This would accommodate holiday periods that follow the Autumn release and may follow the Winter release. We see value in allowing a little more time to ensure costs from our Service Providers are validated and assured prior to their submission.</p>

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		<p>7. In Section 8, regarding Release go-live, whilst we recognise the critical importance of providing the Panel with necessary time to make a determination, it should be noted that there may be good reasons for testing to continue beyond this date in the run-up to a SEC System Release, and so it may not be possible to provide a complete testing picture at this point. We would recommend that the Panel and SECAS consider a suitably agile process that facilitates governance in instances where outstanding testing may be required. DCC has extensive experience of managing governance and approvals processes for system releases and would be happy to support further thinking in this area. Submitting evidence at least six weeks before go-live will create challenges delivering medium to large size modifications when User Testing is mandated.</p> <p>8. Finally, regarding the draft document itself, we would recommend clarifying the Implementation Date Format paragraphs in section 4, possibly by adding some worked examples alongside the explanatory text.</p> <p>Other points to note</p> <p>In reviewing the SEC Release Management Policy, we have also reviewed version 6.17 of the Smart Energy Code, and have noted the following:</p> <p>In Section D10.9 the SEC refers to the ‘Panel Release Management Policy’, and we consider this should be updated to refer to the ‘SEC Release Management Policy’.</p> <p>In Section D10.7 a document is described as “the Panel SEC Release Management Policy” – we consider that this should be amended to “SEC Release Management Policy.”</p>

