This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

Paper Reference:	**SECP_72_1309_16**
Action:	**For Decision**

SEC Document Management Review project overview

1. Purpose

This paper outlines our approach to carrying out a full review of the structure and document management practices of the SEC documentation. This paper summarises the scope of the project and the activities we intend to carry out. We are requesting the Panel's approval of this. The Board will then be requested to approve the project spend.

2. Project overview

The purpose of this project is to review and update the structure and document management practices of the SEC documentation. In doing this, we can improve clarity, streamline the documents, and reduce the time, cost and complexity involved in making changes to the SEC. Through this review, we seek to ensure that the right documents appear in the right place in the SEC, with appropriate governance associated with them.

This paper provides the activities we intend to complete in this financial year. We have noted additional activities that could be completed in subsequent years but have not included them as part of this brief. We have also not included time and effort in progressing and implementing any subsequent Modification Proposals that may be required, as these will be covered under business-as-usual resource.

Why are we undertaking this review?

In July 2019, we presented our thoughts on areas for improvement[1]. We identified the following main issues that this review is intended to address:

- **Version control:** The SEC is made up of 80 individual documents but is treated as one document with one version number. The SEC version number is also dependent on when the release is implemented. Further, some documents (e.g. the Technical Specifications) contain their own version numbers separate to the main SEC versioning. This makes tracking changes to specific sections, and when those changes took place, difficult for Parties.
- **Document categories:** All 80 SEC 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

[1] Please see Panel paper SECP_70_1207_13 for more details.

functional specification). They are also not grouped in a logical manner, with new documents simply given the next available Appendix letter. This makes navigating the SEC difficult, especially for new entrants.

- **Technical Specifications:** We have received feedback from Parties on the complexity of the rules regarding the Technical Specifications and how they are updated. It was felt that the provisions relating to Validity Periods of different versions could be simpler, and a similar approach to those applied to Metering Codes of Practice could be used.
- **Ease of use:** We believe there is duplication within the SEC that can be removed, and opportunities for related provisions spread across multiple documents, to be consolidated. The SEC is also written in 'legalese' and can be hard to read. Simplifying complex statements, legal terminology and cross references will help Parties in identifying their obligations and understand the SEC framework.
- **Document log:** Currently, a 'statement of live SEC documents' is produced. Amending this into a more user-friendly format, with better information on document status and history, would make it a useful document for Parties. They can then follow the changes to the SEC and explore previous updates at their leisure, identifying the changes important to them.

In addition to these, our proposed improvements to the SEC will complement the current digitalisation of the SEC, ensuring the digital format of the SEC is clear and easy for Parties to understand.

3. Project activities

The activities for this review have been split into three main workstreams.

Workstream 1: Establishing the structure

This workstream will review and update the structure of the current SEC. We will complete the following activities:

- We will introduce a simple, conventional version numbering approach and apply a specific version number for each Section, Schedule and Appendix. This will allow Parties to better track when changes occurred in each document. It will also result in only one versioning system for Parties to have to understand.
- We will review the version control mechanism for the Technical Specifications and propose a simpler approach. We will engage with BEIS and the Technical Architecture and Business Architecture Sub-Committee (TABASC) on any proposals. This will respond to feedback received from several Parties over the current complexity of these documents and their Validity Periods.
- We will review each document to identify when changes were introduced and compile a version history log. We will use this to determine what the current version number of each document should be under the proposed new approach. This log will allow Parties to review past changes to each document to clearly understand the evolution of that document and identify the changes that are important to them.
- We will split the subsidiary documents into more meaningful categories, based on purpose or function (for example 'Technical Specifications' or 'Smart Metering Key Infrastructure (SMKI)

documents'). This will group all related documentation together for ease of access, allowing Parties to find all related provisions and obligations more easily.

- Each document or group of documents will be allocated a responsible Sub-Committee(s). This will identify which Sub-Committee(s) should comment on changes to that document as part of any Draft or Modification Proposal (though other Sub-Committees can also comment on changes if they wanted to). We will engage with the Sub-Committees over this allocation. This will ensure that the right experts are consulted on changes as they are developed, ensuring a robust assessment of proposed changes is carried out prior to a decision being made.
- We will compile a 'baseline statement' stating all current SEC documents and the version number(s) currently in effect.

A Modification Proposal may be required to make consequential changes within the SEC (for example the SEC explicitly refers to 'Appendix XX' in places, which will need amending if that convention is changed). We will identify the changes that would need a modification as we carry out this workstream.

Workstream 2: Document hierarchy

This workstream will review which documents need to be included as part of the SEC and which can be removed and subjected to a lighter governance approach (for example Panel approval of changes). We will complete the following activities:

- We will review each SEC Schedule and Appendix and identify whether it is appropriate their content remains subject to the Modifications Process, or to a more proportionate governance process. SECMP0058 'Changes to the governance of the Self-Service Interface' provides a good example of making lower-level detail subject to more proportional governance.
- Where we believe material should be moved to a lower level, we will propose alternative governance arrangements that these should be subject to.

A Modification Proposal will be required to implement any changes. Once we have developed the changes we believe are needed, we will update the Panel, before seeking a sponsor for the modification.

Workstream 3: Consolidation and simplification

This workstream will review the individual documents within the SEC to identify where they can be simplified and written in Plain English. We will complete the following activities:

- We will review each document to identify duplication of provisions. We will propose how these can be consolidated to make it simpler for Parties to follow the SEC provisions and obligations.
- We will review each document and identify where they can be written in clearer, plainer English. We will develop proposed changes to these documents for consideration.

As part of this scope, we will initially review a small number of SEC documents and present these for comment. If there is support for the changes we demonstrate, we will then propose extending the project to complete the remaining documents and progress these to implementation.

Future opportunities

As a further enhancement, we believe the SEC should be reviewed more critically to understand what obligations need to be captured within the SEC. This would be with a view to consolidating the SEC into a framework of core obligations, with underlying processes captured in subsidiary documents.

We believe this review should be undertaken after the SMETS1 Enrolment and Adoption programme has completed and the SEC baseline has become more stable. The industry will need to be more comfortable with the arrangements, and better understand what should and shouldn't be captured within the main SEC Sections, before such a review can be done. We have therefore not included this work as part of this project brief.

Supporting work

Success for these changes will be dependent on Parties being fully informed. We will be working to provide information, guidance and education pieces throughout the review. This will keep Parties abreast of what is being proposed and when these are likely to come into effect, enabling them to prepare for the changes and provide any thoughts and input as we go.

4. Project timescales

We believe that Workstreams 1 and 2 will be completed in time for presentation at the December 2019 Panel meeting. Any changes that don't require a modification can then be set live by the New Year. Once these workstreams are completed, we will commence Workstream 3. We intend to produce our demonstration pieces at the January 2020 Panel meeting, where the Panel can agree if we should continue further.

5. Next steps

If the Panel are happy with the scope, the Board will be requested to approve the spend for this project. We will then commence the outlined work and will keep the Panel informed of progress.

6. Recommendations

The Panel are requested to:

- **APPROVE** the scope of this project; and
- **NOTE** that the Board will be requested to approve the project spend.

David Kemp

SECAS Team

6 September 2019