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<b>Paper Reference:</b>	<b>TABASC_46_1909_20</b>
<b>Action:</b>	<b>For Discussion</b>

## New Draft Proposals and Modification Proposals

### 1. Purpose

This paper provides a summary of the new Draft Proposals raised and the Draft Proposals that have converted to Modification Proposals in the last month. Copies of the draft or approved problem statements for each proposal are attached to this paper.

We seek any initial comments the Technical Architecture and Business Architecture Sub-Committee (TABASC) may have on these proposals at these stages in the framework, and agreement on which proposals it will want to provide further input on as they progress.

### 2. Update on previous TABASC comments

This section lists any updates on the proposals the TABASC discussed last month, where further action was to be taken or a comment sought from the Proposer.

#### [DP080 'Ensuring a Managed move to DUIS Version 3.0'](#)

DP080 was raised by Helen Metcalfe of DCC. The Lead Analyst from SECAS is Harry Jones.

The comments from the TABASC concerning the enduring solution and which versions of the DCC User Interface Specification (DUIS) were forwarded on to the Proposer. They approved of the idea of using this proposal to try and find an enduring solution to prevent recurring modifications for this purpose. The Proposer also noted comments about the consideration of DUIS version 3.1 going forward.

#### [DP082 'Alt HAN Channel Selection'](#)

DP082 was raised by Angel Osés de León of Scottish Power. The Lead Analyst from SECAS is Joe Hehir.

Following the meeting, the comments made on the title choice were passed to the Proposer. They noted the idea of a title change to prevent confusion this proposal is exclusive to Alt HAN. They stated that they will look into this matter before the next Change Sub-Committee meeting.

### 3. New Draft Proposals

This section lists the new Draft Proposals submitted in the last month and which have entered the Development Stage. At this point in the process, we are focused on assessing and clarifying the issue identified, the impacts this is having (including the impact of doing nothing), and the context of this issue within the SEC. Solutions will not be discussed until the Change Sub-Committee have agreed the problem statement has been fully defined.

We invite any views from the TABASC on the issue identified under each proposal, the impacts this may be having, and any areas the Proposer may need to consider further as part of developing their problem statement.

#### DP083 'Change Coordination'

DP083 has been raised by Tom Rothery of the DCC. The Lead Analyst from SECAS is Jordan Crase.

Changes to Users Systems, Devices and processes can have a direct impact on DCC Systems and the overall Smart Metering network. When changes are made to Systems, new Devices are introduced, or updates are made to existing Devices using DCC Systems, there is a risk that these activities may impair the performance of the DCC Total System. In extreme cases, there is a possibility that the Services could be disrupted. User-led changes can also have an impact on how the DCC identifies, triages and manages Incidents. There are no obligations in the SEC for DCC Users to provide such information. This means the DCC does not have a full view of changes and the potential impacts they may have on DCC Systems.

The draft problem statement containing the information provided by the Proposer can be found in Appendix A.

#### DP084 'Other User Panel Seating Amendment'

DP084 has been raised by Maria McLean of the Energy Saving Trust. The Lead Analyst from SECAS is Harry Jones.

Currently, the SEC Panel has two seats to be occupied by Other SEC Parties. However, Other SEC Parties aren't always Other Users, and so this may lead to Other Users being underrepresented. A SEC Panel questionnaire was issued in April 2019 and the outcomes discussed at SEC Panel in June 2019 to gauge opinion. It was suggested that an Other User seat should be added to the Panel to ensure the Other Users are proportionately and fairly represented.

The draft problem statement containing the information provided by the Proposer can be found in Appendix B.

### 4. Draft Proposals converted to Modification Proposals

This section summarises the Draft Proposals that were converted to Modification Proposals by the Panel at their last meeting and which have entered the Refinement Process. At this stage, the issue has been agreed and we have begun developing the business requirements for any solution with the Proposer and the DCC.

We invite any initial views and considerations from the TABASC to feed into the development and assessment of solutions to the issue. We also seek agreement with the TABASC as to which of these

they will need to provide further input on, including commenting on the business requirements as they are developed.

#### MP079 'Provisions for withdrawing modifications'

MP079 has been raised by Simon Trivella of British Gas. The Lead Analyst from SECAS is Bradley Baker.

The provisions in SEC Section D 'Modifications Process' are built around the key principle that any SEC Party can raise a proposal to change the SEC. Each proposal must be allowed into the process by SECAS and the panel and should be assessed fairly.

The SEC contains provisions for the Proposer to withdraw their proposal prior to final decision. However, this power is limited to the Proposer; SECAS, the Panel nor their Sub-Committees can close a modification prior to decision.

The TABASC noted this proposal previously. Members expressed an interest were these powers to be extended to Sub-Committees but noted there is no DCC Systems impact expected.

The problem statement containing the information provided by the Proposer can be found in Appendix C.

## **5. Recommendations**

The TABASC are requested to **DISCUSS** the proposals and provide any views and comments.

**Harry Jones**

**SECAS Team**

**12 September 2019**

#### **Attachments:**

- **Annex A:** DP083 draft problem statement
- **Annex B:** DP084 draft problem statement
- **Annex C:** MP079 final problem statement

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# DP083 ‘Change Coordination’

## Problem statement – version 0.1

### About this document

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This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

### Proposer

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This Draft Proposal has been raised by Tom Rothery from the Data Communications Company (DCC).

## What is the issue or problem identified?

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### Background

#### *DCC led changes*

Under SEC obligations, the DCC informs Users of planned changes to DCC Systems. This is primarily performed through the Forward Schedule of Change. This tool ensures that the DCC provides timely information on Planned Maintenance and is designed to explicitly minimise the impact of changes on DCC Users. It is also intended to help DCC Users plan their own changes without disruption from Planned Maintenance or changes to DCC Internal System.

#### *User led changes*

Changes to Users Systems, Devices and processes can also have a direct impact on DCC Systems and the overall Smart Metering network. When changes are made to Systems, new Devices are introduced, or updates are made to existing Devices using DCC Systems, there is a risk that these activities may impair the performance of the DCC Total System. And, in extreme cases, there is a possibility that the Services could be disrupted. User-led changes can also have an impact on how the DCC identifies, triages and manages Incidents.

### Issue

As Users are not currently required to notify the DCC of their planned changes, the DCC only has a partial view of planned changes that can impact the Smart Metering network. Without a full view of all change, the identification, triage and management of Incidents is more challenging to execute, and consequently incident resolution can take longer.

### How does this issue relate to the SEC?

In accordance with SEC Section H8.4, the DCC is required to provide Parties, Registration Data Providers (RDPs) and the Technical Architecture and Business Architecture Sub Committee (TABASC) with a schedule of each month's Planned Maintenance. This schedule sets out:

- the proposed Maintenance activity;
- the parts of the Services that will be disrupted (or where there is a Material Risk of disruption) during each Maintenance activity;
- the time and duration of each Maintenance activity; and
- any associated risk that may subsequently affect the return of normal Services.

In accordance with SEC Section H8.8, where the DCC is proposing to make a change to DCC Internal Systems the DCC shall also:

- undertake an assessment of likely impact on Parties and RDPs that may arise because of the Maintenance;

- consult with Parties, RDPs and the TABASC regarding any Material Risk of disruption;
- provide Parties and RDPs with the opportunity to be involved with any testing of the change to DCC Internal Systems prior to implementation; and
- undertake an assessment of the likely impact of the change on the security of the DCC Total System, Smart Metering Systems, and the Systems of Parties and RDPs.

There are no such obligations in the SEC for DCC Users to provide such information. This means the DCC does not have a full view of changes and the potential impacts they may have on DCC Systems.

As a Licenced body, DCC has a duty to fulfil its Licence Objective<sup>1</sup> and the SEC Objective<sup>2</sup> of maintaining an efficient and economical service, to enable the Smart Meter roll-out and to provide ongoing Smart functionality for end consumers. A holistic, transparent view of both DCC-led and User-led changes can help maintain a smooth service for all Users in the future and support DCC in fulfilling its objectives.

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<sup>1</sup> The First Enduring General Objective of the Licensee is to carry on the Mandatory Business in the manner that is most likely to ensure the development, operation, and maintenance of an efficient, economical, co-ordinated, and secure system for the provision of Mandatory Business Services under the Smart Energy Code and where relevant the Retail Energy Code.

<sup>2</sup> The second General SEC Objective is to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence.

## What is the impact this is having?

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### What Incidents have already been encountered?

The DCC has already encountered Incidents resulting from the lack of communication of planned User led changes. Two such incidences and their impacts are noted here.

#### Firewall

A User made changes to their firewall, which blocked the message route between the Data Service Provider (DSP) and the User. No messages were received by the User from the DSP, and the DSP had a build-up of 1,500,000 messages, which impacted the performance of the network and the operations of all Users. The DCC had to reallocate its resources to investigate the issue, which meant that the Business Continuity Disaster Recovery (BCDR) activity that was planned for that day had to be postponed.

#### Meter data management

A User deployed a new meter data management system with adverse repercussions. The launch caused the generation of erroneous messages by the User's systems, which flooded the DCC System. The 'message storm' caused an interruption to the DCC service, impacting all Users' ability to commission smart meters. Users had to both rebook installations, which meant taking slots from other planned installations, and install SMETS1 assets instead.

### What is the impact of doing nothing?

As described in the examples above, interruptions are already happening. The DCC is concerned that, without greater transparency of User change, there will be even more disruption ahead. The complexity of the Smart Metering estate is growing with new market entrants, firmware versions, Devices and functionality, which may have a disproportionate impact on the Smart Metering network.

## What are the views of the industry?

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### Views of the DCC

The DCC is supportive of changes to the SEC to ensure transparency of DCC User planned changes and coordination of these changes. DCC have also been working closely with SEC Parties to identify a solution for sharing User-led change.

### Views of SEC Parties

The views of Parties will be gathered during the Development Stage.

### Views of Panel Sub-Committees

The views of Panel Sub-Committees will be gathered during the Development Stage.

### Views of the Change Sub-Committee

The views of the Change Sub-Committee will be gathered during the Development Stage.



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# DP084 ‘Other User Panel Seating Amendment’

## Problem statement – version 0.1

### About this document

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This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

### Proposer

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This Draft Proposal has been raised by Maria McLean from Energy Saving Trust (EST).

## What is the issue or problem identified?

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There is a need to distinguish between Other Users and Other SEC Parties as the two have differences in the SEC. Other Users are described as Users not currently acting in any of the other User Roles, even if they are a Supplier or Network Operator. By contrast, an Other SEC Party is defined as a Party that isn't a Supplier, Network Operator or DCC. Currently, the SEC Panel have two seats to be occupied by Other SEC Parties, but because Other SEC Parties aren't always Other Users this may lead to Other Users being underrepresented. A SEC Panel questionnaire was issued in April 2019 and the outcomes discussed at SEC Panel in June 2019 to gauge opinion. It was suggested that an Other User seat should be added to the Panel to ensure the Other Users are proportionately and fairly represented. Therefore, under this proposal the two Other SEC Party seats will be split so there will be one Other SEC Party seat and one Other User seat on Panel.

The Panel is currently comprised of a mix of elected and appointed representatives. Of the eight elected seats on Panel, they are allocated as such in SEC Section C3.1 (a) – (e):

- Two persons elected by Large Suppliers;
- Two persons elected by Small Suppliers;
- One person elected by Electricity Network Parties;
- One person elected by Gas Network Parties; and
- Two persons elected by Other SEC Parties.

In order to ensure Other Users are fairly represented Other Users require one of the Other SEC Party seats.

## How does this issue relate to the SEC?

At the moment, SEC Section C 'Governance' currently specifies in C3.1 (e) that "two persons elected by Other SEC Parties" is the seat structure. Therefore, any Modification Proposal that splits these seats to one Other User and one Other SEC Party needs to amend this section.

Additionally, the terms of "Other User" will have to be added throughout other governance areas in the SEC. This is so that a discrepancy can be given between Other Users and Other SEC Parties when considering they will be different seats.

## What is the impact this is having?

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If nothing is done, then it will result in potentially allowing Other Users to be underrepresented in Panel meetings. With Other SEC Parties able to occupy both seats currently without being Other Users, this presents a flaw in the current Panel seating arrangements.

Alternatively, if the Panel were to change the seating arrangement but the SEC left unchanged, the SEC would not be accurately reporting the structure of the Panel's seating. SEC Section C 'Governance' needs to be aligned with the current Panel structure, so any change to this structure requires a Modification Proposal to help facilitate this change.

## What are the views of the industry?

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### Views of the DCC

The views of the DCC will be gathered during the Development Stage.

### Views of SEC Parties

The views of Parties will be gathered during the Development Stage.

### Views of Panel Sub-Committees

The views of Panel Sub-Committees will be gathered during the Development Stage.

### Views of the Change Sub-Committee

The views of the Change Sub-Committee will be gathered during the Development Stage.

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# DP079 ‘Provisions for withdrawing modifications’

## Problem statement – version 0.3

### About this document

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This document provides a summary of this Draft Proposal, including the issue or problem identified, the impacts this is having, and the context of this issue within the Smart Energy Code (SEC).

### Proposer

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This Draft Proposal has been raised by Simon Trivella from British Gas.

## What is the issue or problem identified?

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### Who is able to withdraw a modification?

The provisions in SEC Section D 'Modifications Process' are built around the key principle that any SEC Party can raise a proposal to change the SEC, and that each proposal should undergo due process for a solution to be developed and for this to be determined upon. As such, SECAS and the Panel must allow any proposal into the process and ensure it receives a fair assessment.

The SEC does contain provisions for the Proposer to withdraw their proposal prior to final decision, if they no longer wish to progress it (for example it is identified that the issue can be resolved without a change to the SEC, or if it is clear the proposal is not likely to succeed). However, this power is limited to the Proposer; SECAS, the Panel nor their Sub-Committees cannot close a modification prior to decision.

During their recent feedback sessions, SECAS identified frustration among many Parties that the SEC does not provide any power for SECAS, the Panel or the Change Board to withdraw a modification. The primary concern raised is that a lot of time, resource and cost is being put into Modification Proposals that are not going to progress or are unlikely to be implemented. Equally, there are cases where Proposers are not engaged with the process and allow their proposals to effectively sit in stasis.

### How can this issue be mitigated now?

The improvements recently introduced to the SEC modifications framework attempt to nullify this risk. The new Development Stage helps to ensure proposals are fully thought through and supported before they progress. Equally, requiring Change Board approval prior to incurring the cost of a DCC Impact Assessment seeks to prevent nugatory costs and effort during the Refinement Process.

However, these are preventative measures and can only go so far, especially since these rely on the Proposer acting on the views of the Change Sub-Committee or the Change Board. A Proposer is within their right to ignore the views of the wider industry and continue to progress their proposal to decision, even if it is clear it is not required, feasible or supported.

The Panel does have the power to set the timetable for a proposal's progression and could theoretically choose to progress a Modification Proposal to decision early. However, it is anticipated that any Modification Proposal whose solution is not fully developed and assessed would be viewed as incomplete, and so would be sent back by the Change Board or the Authority.

The Panel have noted Parties' frustrations and believe the issue should be explored further to see if further change around these provisions is merited.

### How does this issue relate to the SEC?

The provisions for withdrawing Modification Proposals, including that this ability is limited only to the Proposer of the change, is set out in Section D.

## What is the impact this is having?

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### Industry time and effort

A lot of time and effort is required by SECAS, the DCC and SEC Parties in assessing and developing solutions to Modification Proposals, including:

- Developing business requirements and solutions options
- Developing the business case for change
- Performing and reviewing DCC Assessments (with a cost associated with performing Impact Assessments)
- Attending Working Group sessions
- Responding to consultations and
- Preparing and reviewing documentation such as Modification Reports, business requirements and legal text

As long as a Proposer wishes to proceed with their proposal, this work must be completed in order to present a fully developed solution and accompanying assessment to the Change Board and the Authority for decision. This must happen even for proposals that are unlikely to be implemented. Consequently, SECAS and industry time and effort continue to be spent, along with any costs associated with a DCC Impact Assessment, resulting in costs being incurred to Users.

There is currently insufficient check-and-balance in the process to ensure that industry time and effort is being spent wisely. If a Proposer wishes to progress their proposal, the Panel is required to ensure that a suitable and robust assessment is carried out to develop the proposal for decision. This may result in SECAS and industry time and effort needing to be spent on a proposal unlikely to succeed that could otherwise be spent on other proposals that would provide benefit to Parties, incurring additional costs for Users for nugatory work.

## What are the views of the industry?

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### Views of the DCC

The DCC commented that this modification is unlikely to impact DCC total systems.

### Views of SEC Parties

No further comments from SEC Parties were received during the development stage.

### Views of Panel Sub-Committees

The Draft Proposal was presented at the Security Sub-Committee meeting on Thursday 25 July 2019. The SSC commented that they would show an interest on this subject and will be happy for this to be explored.

The Draft Proposal was discussed with the Operations Group Sub-Committee on Tuesday 6 August 2019. The Group showed concerns that the modification could result in parties 'shutting down' modifications through numbers. However, we clarified that the purpose of this proposal is to help close modifications that are not progressing or are unlikely to progress. Rationale will also have to be given for modifications set to be closed.

After discussing the Draft Proposal at their latest meeting, TABASC showed an interest in the issue and wanted to clarify who would have the power to withdraw modifications. In particular they wanted to know if the power would be extended to Sub-Committees.

### Views of the Change Sub-Committee

The Change Sub-Committee commented that this Draft Proposal would create a shift away from full Proposer ownership; however, this could be mitigated through the development of the appeal process.

One CSC Member queried if it was only the Proposer who can withdraw a modification or members of other Sub-Committees. It was noted that some guidelines would be needed on what can be withdrawn and who is authorised to do so.

It was queried whether this process was being developed with vexatious modifications in mind. The Proposer confirmed it was more around having a backstop for proposals that lack support or are no longer needed that subsequently stall within the process.

Members also considered that there could be a positive impact in terms of modification timescales and making sure change progresses on a timely basis. It was also mentioned that there could theoretically be a timeout on modifications that have been in stasis for a certain period of time. Ofgem commented that this could potentially be implemented into an existing process, such as the Panel's abilities to set progression timetables, as opposed to introducing an entirely new one.

The Draft Proposal was taken to the Change Sub-Committee for decision where it was met with unanimous approval. The Change Sub-Committee stated that the way in which the powers are used must be clearly defined in the Refinement Process.



### Initial views of the SEC Panel

Panel members felt that while the idea would be against the general principles of code modifications, some sort of backstop would be good, and the principles SECAS laid out would provide sufficient safeguards against the Panel withdrawing modifications unilaterally. Overall, the Panel were supportive of exploring this issue further.