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Paper Reference:	CSC_08_2910_05
Action:	For Decision

DP088 Draft Proposal decision

1. Purpose

This paper provides a summary of our assessment of [DP088 'Power to raise modifications'](#), taking into account industry views and views of the Panel Sub-Committees on the problem this Draft Proposal has identified. We are asking the Change Sub-Committee (CSC) to agree that the problem identified under this Draft Proposal is clearly understood and that it is ready to progress to a Modification Proposal.

2. What is the issue?

DP088 has been raised by Simon Trivella of British Gas.

There are very limited circumstances where the SEC Panel can raise a modification, and no provisions for SECAS to do so. These constraints act as a blocker to the efficient progression of changes. The Panel has proposed several proposals in the past. However, it was not able to raise these proposals itself. Instead, SECAS sought a SEC Party to do so on the Panel's behalf. Additionally, SECAS has also put forward several Draft Proposals to the Panel for endorsement, but then needed to ask for volunteer Proposers.

Needing to find a sponsor adds additional time and effort into the process. The sponsor must also agree to devote the time and effort that being a Proposer requires to a proposal where they are not the originator and may only be acting on behalf of others. Furthermore, SECAS or the Panel will need the sponsor's agreement for the solution subsequently developed, adding in further steps.

The problem statement containing the information provided by the Proposer and updated by SECAS during our investigations can be found in Appendix A.

3. Comments on the issue

We have received comments in support of this proposal. The DCC has recommended some avenues that should be investigated as part of the progression of this modification. This includes consulting with the Authority to take consideration of the planned reform of the energy Codes, and noting the SEC Panel or SECAS not having any licence conditions and the implications this may have.

The full collated comments and questions raised can be found in Appendix B.

4. Next steps

We believe the issue is fully understood and that there is support to develop a solution to this. We recommend that this Draft Proposal is converted into a Modification Proposal and enters the Refinement Process. This will allow for a solution to be developed and for this to be discussed with the industry.

5. Recommendations

The CSC is requested to:

- **AGREE** that the issue identified under DP088 is clearly defined and understood;
- **RECOMMEND** to the Panel that this Draft Proposal is ready to be converted to a Modification Proposal; and
- **RECOMMEND** to the Panel that the Modification Proposal should proceed to the Report Phase.

Jordan Crase

SECAS Team

22 October 2019

Attachments

- **Appendix A:** DP088 problem statement
- **Appendix B:** DP088 industry comments