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Stage 04: Final Modification Report

# SECMP0020: Removal of the confidential classification of the unique identifiers listed in SEC Schedule 5

This Modification Proposal seeks to remove the confidential classification requirement in SEC Schedule 5 which prohibits the publication and disclosure of the unique identifier(s) described within it.

The Change Board voted unanimously to approve this modification on 23<sup>rd</sup> November 2016.



SECMP0020 will be implemented on 14<sup>th</sup> December 2016, five Working Days after the end of the 10 Working Day referral period.



Potential Impacts on:

- SEC Panel; and
- SECAS

What stage is this document in the process?

01	Initial Modification Report
02	Refinement Process
03	Report Phase
04	Final Modification Report

**Any questions?**

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SECMP0020 Final Modification Report

24<sup>th</sup> November 2016

Version 1.0

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## About this document

This document is the Final Modification Report for SECMP0020. The Change Board considered this report as part of their deliberations on whether to approve, reject, or defer the Modification Proposal. It has been updated following the Change Board vote on 23<sup>rd</sup> November 2016.

**Attachment B** contains the responses to the Modification Report Consultation.

**Attachment C** provides the full details of the Change Board vote outcome.

## 1. Summary

This section provides an overview of SECMP0020. For further details on the Modification Proposal, please refer to subsequent sections. Defined terms and acronyms used in this document are listed in the Glossary (section 9) of this document.

### 1.1 Why Change?

SEC Schedule 5 'Accession Information' specifies that the unique identifier (Market Participant Identifier (MPID)) associated with Network Operators and Suppliers, as well as the unique identifier by which Meter Operators and Meter Asset Managers are identified) must be treated as confidential.

This information is publically available under other Industry Codes, but due to the confidentiality restriction, this information cannot be provided under the SEC.

### 1.2 Solution

SECMP0020 seeks to remove the confidentiality clause so that MPIDs can be published on the SEC website via the ID Allocation spreadsheet.

### 1.3 Impacts and Costs

There is no impact on SEC Parties as they currently provide the information as part of the accession process and the data is publically available.

The costs to implement this change will be limited to the Code Administrator's time and effort.

### 1.4 Implementation

5 Working Days (WD) following the end of the 10 WD referral period following the Change Board Vote.

### 1.5 Path 3: Self-Governance

Changes to SEC Schedule 5 are non-material and require minimal changes to the SEC. Therefore, SECMP0020 is being progressed as a Path 3 Modification (Self-Governance).

### 1.6 Modification Report Consultation Responses

10 SEC Voting Groups (representing a total of 15 SEC Parties) responded to the Modification Report Consultation. Other than one expression of "no interest", all respondents supported the approval of SEMP0020.

## 2. Why Change?

### 2.1 Background

When the SEC version 4.0 (SEC4.0) was designated on 14<sup>th</sup> January 2015, SEC Schedule 5 contained a clause which stated that unique identifiers known as Market Participant Identifiers (MPIDs), for both Suppliers and Network Parties, as well as the unique identifiers for Meter Asset Managers (MAMs) or Meter Operators (MOPs) should be treated as confidential. As a result, these MPIDs cannot be made available on the SEC website.

MPIDs are currently publically available under the Balancing and Settlement Code (BSC) and Supply Point Administration Agreement (SPAA) which publish the unique identifiers on their websites.

### 2.2 What is the issue?

Since the MPIDs are to be treated as confidential, they cannot be made available to SEC Parties through mediums that may aid their internal processing. Consequently, SEC Parties must put in place their own extra steps and activities outside of the SEC to manage the information they need.

This information is publically available under other Industry Codes, such as the BSC and SPAA, therefore it is not efficient for SEC Parties to have to take these extra steps to get the information; nor does it seem logical to restrict publically available information as confidential.

### 3. Solution

#### 3.1 Proposed Solution

Western Power Distribution (the Proposer) raised SECMP0020 on 3<sup>rd</sup> October 2016. It seeks to remove the confidential classification provisions in SEC Schedule 5 which prohibit the publication and disclosure of the unique identifier(s) described within it.

The SECMP0020 solution would include the unique identifiers in the ID Allocation Spreadsheet which is published on the SEC website. This would aid SEC Parties in the identification of other SEC Parties. If SECMP0020 is approved, the [ID Allocation Procedure document](#) and related Excel spreadsheet will be updated to capture the provision of these unique identifiers.

As the SEC develops and the Smart Metering Implementation Programme (SMIP) progresses, Parties interaction will increase. Facilitating the availability of the unique identifiers to SEC Parties would lead to further efficiency.

The Proposed legal drafting to deliver the Modification Proposal solution is provided in Attachment A.

As noted above, the unique identifier information is already available freely through other mechanisms, e.g. via the ELEXON website in the case of the BSC. Therefore, this change will have no impact on security.

#### 3.2 Proposers views against SEC Objectives

The Proposer believes SECMP0020 will better facilitate General SEC objective (g) *“to facilitate the efficient and transparent administration and implementation of this Code”*.

They believe it will enable SEC Parties to efficiently map unique identifier information to other SEC Parties and allow for quicker identification of SEC Parties and organisations by enabling the provision of the MPID information within the ID Allocation Procedure excel spreadsheet.

#### 3.3 Sub-Committee views on SECMP0020

As the modification does not impact the Technical, Business Architecture or Security matters, neither the Technical Architecture and Business Architect Sub-Committee (TABASC) or Security Sub-Committee (SSC) remits are impacted by this changes.

## 4. Impacts and Costs

### 4.1 Impacts

SECMP0020 will have **no impact** on SEC Parties, the DCC or any systems (including DCC Systems, User Systems and/or Smart Metering Systems). There are also no identified impacts on other energy Codes, Greenhouse Gas Emissions or Consumers.

The following section sets out the assessment of the impacts arising from SECMP0020.

Potential Impacts of SECMP0020	
Smart Energy Code Parties	
Suppliers	No Impact
Networks	
DCC	
Other Users	
Systems	
DCC Systems	No Impact
User Systems	
Smart Metering Systems	
Other	
Impact on Consumers	
No Impact	
SEC and subsidiary documents	
SEC Sections	SEC Schedule 5, paragraphs 13, 14 & 15 will have the confidentiality provisions removed. The proposed legal changes can be found in Attachment A.
Subsidiary Documents	No impact.
Other Industry Codes and Documents	
No Impact	
Greenhouse gas emissions	
No Impact	

## 4.2 Costs

The costs to implement this change will be limited to the Code Administrator's time and effort to making the necessary amendments to the SEC and release a new version to SEC Parties and the publication of it on the SEC website.

The table below sets out the estimated working day effort to implement this change:

Implementation activities, cost and effort		
Implementation activities	Effort	Cost
<ul style="list-style-type: none"> <li>Application of approved changes to the SEC</li> <li>Publication of new version of the SEC on the SEC website and issuance to SEC Parties</li> <li>Review and update any impacted SEC guidance materials</li> </ul>	2 Man Days maximum	£1200 <sup>1</sup>
<ul style="list-style-type: none"> <li>Ongoing costs</li> </ul>	N/A	N/A

<sup>1</sup> Based on a blended rate of £600 per day

## 5. Implementation

### 5.1 Recommended Implementation approach

As this Modification Proposal only involves minor changes to SEC Schedule 5, and should have no impact on SEC Parties or the DCC, the following implementation approach is proposed:

- **5 Working Days** following the end of the 10 Working Day referral period that applies after the Change Board vote.

On this basis subject to now referrals, SECMP0020 will be implemented on 14<sup>th</sup> December 2016.

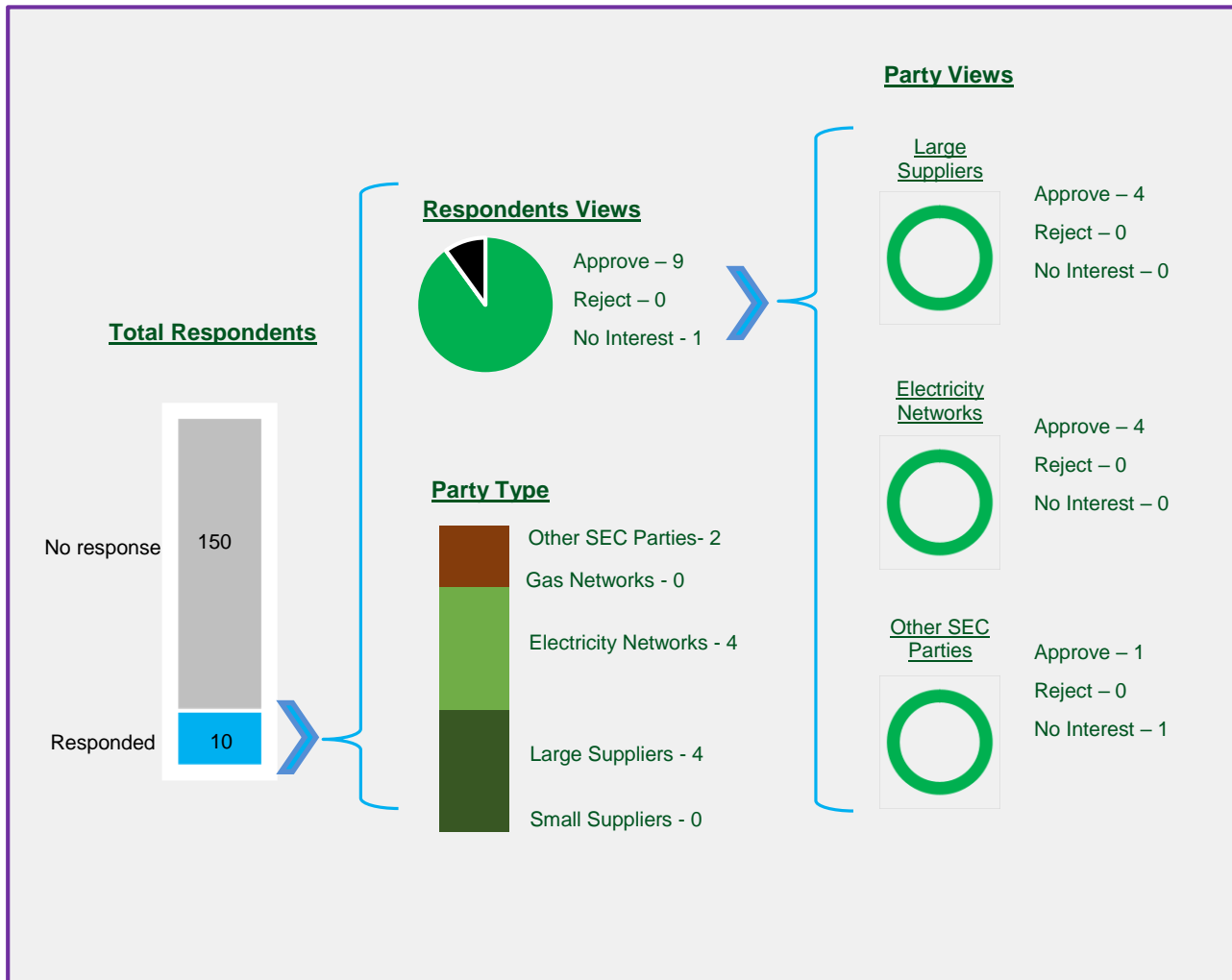
Note this is subject to SECMP0020 being treated and voted on by the Change Board as a Path 3 Self-Governance Modification Proposal.



## 6. Modification Report Consultation Responses

This section summarises the responses received to the Modification Report Consultation. 10 consultation responses, representing a total of 15 SEC Parties<sup>2</sup>, replied to the Modification Report Consultation. The full list of represented SEC Parties and the responses are provided in Attachment A.

### 6.1 Summary of Responses



<sup>2</sup> Out of a total of 201 SEC Parties.

## 6.2 Summary of views against the SEC Objectives

Summary of Large Suppliers' views for and against SECMP0020		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (a)	One Large Supplier agreed that SECMP0020 will allow for efficiency gains in dealing with SEC Parties through quicker mapping of the unique identifier information.	None
Objective (g)	All Large Suppliers also agree that SECMP0020 aligns with the SEC Objectives g) in that it would aid the efficient and transparent administration and implementation of this Code. Respondents also noted that they believe there is no reason for identifiers to be continued to be marked as "confidential".	None
Summary of Networks' views for and against SECMP0020		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	The Network respondents agreed that SECMP0020 better facilitates objective (g). Network Operators agree that SECMP0020 will improve efficiency of SEC Parties accessing MPIDs. This will allow for the quicker identification of organisations.	None
Summary of Other SEC Parties' views for and against SECMP0020		
SEC Objectives	Benefit(s)	Drawback(s)
Objective (g)	The Other SEC Party respondent indicated that SECMP0020 will greatly assist with the efficient provision, installation and operation of Smart Metering by removing the unnecessary confidentiality relating to MPIDs.	None

## 6.3 Other Consultation Response Observations

One Large Supplier in its consultation response indicated that the functionality that the Modification Proposal would enable would only be required on rare occasions.

## 7. Change Board Decision

### 7.1 Deferral?

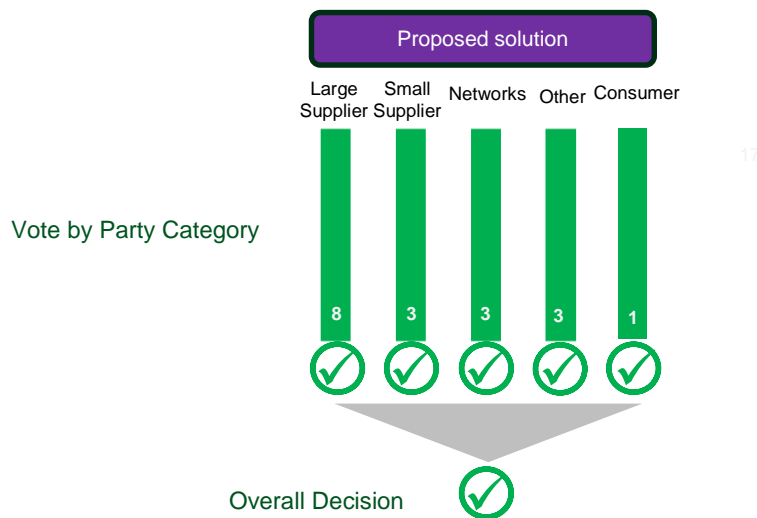
The Change Board unanimously agreed that SECMP0020 should not be sent back to the SEC Panel for further clarification or analysis.

### 7.2 Approve SECMP0020

The Change Board unanimously voted to approve SECMP0020, due to the modification better facilitating SEC Objective (a) and (g)<sup>3</sup>:

- facilitating the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers’ premises within Great Britain; and
- facilitating the efficient and transparent administration and implementation of this Code.

Details of voting by Party Category is provided in Attachment C. A summary of the Change Board’s views against the applicable SEC objectives can be found below.



Summary of Change Board views for SECMP0020		
SEC Objective	Benefit	Drawback
Objective (a)	<ul style="list-style-type: none"> <li>• Allows for efficiency gains in dealing with SEC Parties through quicker mapping of all unique identifiers.</li> </ul>	None
Objective (g)	<ul style="list-style-type: none"> <li>• Ensures that information that is deemed as “non-confidential” is made available to SEC Parties.</li> <li>• Reduces administration burdens by providing a more efficient process for mapping unique identifiers.</li> <li>• Allows for all unique identifiers to be available to SEC Parties in one location.</li> <li>• Aligns the SEC with other industry codes.</li> </ul>	None

<sup>3</sup> The seventh General SEC Objective is to facilitate the efficient and transparent administration and implementation of this Code.

### 7.3 Change Board consideration

A Change Board Member queried why the unique identifiers were currently classified as confidential. SECAS advised that they may have been provisionally marked as confidential, at the time of designation, as it was not apparent that this information was publicly available under other Industry Codes and that mapping could be achieved through these means. The Change Board noted that this was not highlighted in the FMR and agreed that this level of detail should be included in FMRs for future modifications being considered by the Change Board.

## Appendix 1 – Glossary and References

Glossary		
Acronym	Term	Plain English Summary
BSC	Balancing and Settlement Code	The Legal document setting out the rules for the operation and governance of the Balancing Mechanism and Imbalance Settlement. A licensed electricity generators and suppliers must sign up to the BSC and other interested parties may also choose to do so.
GBCS	Great Britain Companion Specification	A SEC Subsidiary Document that describes the HAN interfaces of the ESME, GSME, CH, HCALCS, IHD and PPMID.
MPID	Market Participant Identifier	This is a four alpha character ID and is registered within Market Domain Data (MDD) which maintains key information essential to the operation of the Supplier Volume Allocation arrangements.
MRA	Master Registration Agreement	The Master Registration Agreement (MRA) provides a governance mechanism to manage the processes established between electricity suppliers and distribution companies to enable electricity suppliers to transfer customers.
MAM ID	Meter Asset Manager	An agent appointed by a Gas Supplier to install and maintain gas meters.
MAP ID	Meter Asset Provider ID	The owner of a device to whom the registered supplier pays rents.
MOP ID	Meter Operator Participant ID	An agent appointed by an electricity supplier to install and maintain electricity meters.
UNC	Uniform Network Code	The Uniform Network Code (UNC) is the hub around which the competitive gas industry revolves, comprising a legal and contractual framework to supply and transport gas.

## References

The following table contains any useful links relevant to this change or referenced in this document.

Links and References	
Description	Link
A Consultation on New Smart Energy Code Content (Stage 4) and consequential/ associated changes to licence conditions	<a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4_-_Consultation_Document.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/329306/SEC4 - _Consultation_Document.pdf</a>