

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_75_1312_23
Action:	For Discussion

SEC Document Management Review update

1. Purpose

This paper provides an update on our progress with the SEC Document Management Review and our intended next steps. The Panel is invited to endorse the proposed improvements and next steps.

2. Goals of the project

The Document Management Review project was set up to improve the structure and document management practices of the SEC¹. In doing this, we are seeking to remove complexity, improve clarity and streamline the SEC documents.

Under this review we are examining the following issues:

- **Version control:** The SEC is made up of 80 individual documents but is treated as one document with a single version number that is dependent on when in a year a change 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 functional specification). They are also not grouped in a logical or intuitive 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.

¹ Please see Panel paper SECP_72_1309_16 for the full project proposal.

- **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.

Our proposed improvements will complement the work being done with CodeWorks, ensuring the digital format of the SEC is clear and easy for Parties to understand.

3. Identified improvements

This section sets out our proposed improvements identified so far and how we intend to take these forward.

3.1 Introduce a SEC Document Log

We have developed a SEC Document Log to replace the 'statement of live documents' noted above. This document will list all SEC documentation along with its version number, the effective date of that version and the change (e.g. a SEC Release) that resulted in that version being issued.

For completeness, the Document Log will also include all related SEC Documentation (i.e. those documents referenced within the SEC that do not form part of the SEC). An example of this is the SEC Release Management Policy, which is required under SEC Section D10.7 but is not a part of the SEC itself. We will also include Design Notes in the log.

The Document Log will provide a single definitive source of all SEC documents and the versions that are currently in effect. This will make it easier for Parties to identify everything they need to be aware of to meet their obligations.

3.2 Document categorisation

Currently, the document structure of the SEC can cause confusion. Subsidiary documents are often referred to as a blend of document types: 'Subsidiary Documents', 'Schedules' and/or 'Appendices'. There is no material difference in the function or governance of these document types, and the type applied to a document comes down simply to how it is referenced in the SEC.

In order to simplify the types of document relating to the SEC we are grouping documents into three types:

- **The SEC:** All SEC Sections A-Z.
- **Code Subsidiary Documents:** All the Schedules and Appendices.
- **Other:** All documents the SEC requires, such as the SEC Release Management Policy and the Security Controls Framework (SCF), but do not form part of the SEC.

In addition to the three SEC Document types we are also proposing to place these into categories that will make it easier for Parties to quickly identify all documents related to a topic. We have identified seven such categories:

- **Section:** The SEC Sections, laying out the core obligations.
- **Technical Specification:** The Smart Metering Equipment Technical Specifications (SMETS), the Communications Hub Technical Specifications (CHTS), the GB Companion Specification (GBCS), the DCC User Interface Specification (DUIS), the Message Mapping Catalogue

(MMC) and the Central Products List (CPL) Requirements Document, as well as the accompanying applicability tables and compatibility matrix.

- **Security:** Any documents relating to the security architecture, including the Smart Metering Key Infrastructure (SMKI) arrangements.
- **Interface Document:** Any documents laying out how DCC and Party systems interact with each other (e.g. Codes of Connection and Design Specifications).
- **Testing:** Any documents relating to testing and testing approaches.
- **Governance:** Any documents relating to the processes and framework for governing the SEC.
- **Form:** Any document that consists of a form Parties can fill in.

We will be trialling out this categorisation approach within CodeWorks. During this time, we welcome feedback from users on whether we have got the groupings and allocations right. Once we believe we have got it correct, we can seek to formalise the approach within the SEC.

3.3 Revise the document version numbering approach

Effective from the February 2020 SEC Release, we will give each SEC Section and Subsidiary Document their own individual version number.

The SEC is currently at version 6.21; we will therefore set each SEC Section and Subsidiary Document which do not have their own version numbers to version 7.0. The Appendices that do currently have their own version numbers will be retained, with those that currently aren't set to the next integer version as part of this update.

Individual version numbers will then increase by an integer value (e.g. 8.0, 9.0 etc) each time the document is updated. Decimal versions (e.g. 7.1, 7.2 etc) will be used for draft versions published ahead of implementation.

This approach will make it easier for users to identify which parts of the SEC have been updated and when the last version was released. It will also make SECAS's administration of changes more efficient, as well as clearly marking live and draft versions of documents ahead of a release.

Please note we are **not** proposing to apply these changes to the Technical Specifications² at this time; these will retain their current version numbering approach. However, we are working on improvements to the applicability tables and the compatibility matrix, which we believe will make these clearer to Parties. We will be including this as part of the Document Log and will be requesting Party feedback on this. We will continue to investigate if further improvements can be made in the future.

3.4 Remove surplus Subsidiary Documents

In order to streamline the SEC, we have identified several SEC documents that we believe could be removed, either in their entirety because they are obsolete or merged with another similar document.

We also believe that several Subsidiary Documents, or parts of documents, could be removed from the SEC, similar to how the detailed Self-Service Interface (SSI) requirements were removed under [SECMPO058 'Changes to the governance of the Self-Service Interface'](#). This would allow changes to lower-level details to be subject to lighter governance, while ensuring the overarching obligations remained subject to the Modifications Process.

² The SMETS, the CHTS, the GBCS, the DUIS and the MMC.

Further work is required to identify all suitable documents, and Modification Proposals would be required to implement any changes. Before taking forward any changes, we will seek legal advice from Gowling and input from the relevant Sub-Committees to ensure our proposals would be valid.

3.5 Ceasing to pre-designate changes

Historically, BEIS has sought to pre-designate changes, particularly to the Technical Specifications, into the SEC prior to go-live. A consequence of this approach has been that versions can be superseded before they become effective. This makes it harder for Parties to determine which versions are live or not. Furthermore, should an implementation date change (as happened with the November 2019 SEC Release), additional work is required to ensure the pre-designated changes are implemented correctly.

We do not believe that the approach of pre-designating change is required going forward. SEC Sections D10.2-D10.4 set out that the Panel determines what actions are needed to implement change and a suitable implementation timetable for this. It does this via the Release Implementation Document (RID) for each SEC Release. These provisions also require Parties to co-operate with the Panel to ensure that they take appropriate action to be ready and that modifications are implemented by the agreed implementation date. If Parties are not ready, they place themselves at risk of being found in breach of the SEC following implementation.

Rather than pre-designating SEC Documents, we will ensure the redlining for all approved changes for a SEC Release is available both on the [Developing SEC](#) page and on the [SEC Release's](#) page on the SEC website. These will be kept up-to-date as modifications are approved for inclusion. CodeWorks will also allow users to see all the changes pending implementation.

This approach will mean only live content is included in the live SEC, with pending content clearly visible on our website. Additionally, we will not end up with versions of documents in the live SEC that are superseded before they even become effective. This will remove any confusion as to which parts of the SEC are or aren't in effect and make it clearer to Parties which versions are applicable.

4. Next steps

We are intending to implement these changes in parallel with the February 2020 SEC Release. We believe this will be the most efficient time to introduce these changes. We will prepare guidance for Parties on the changes in advance, so that they are fully aware before the changes are introduced.

As noted, we will be trialling some of our improvements in CodeWorks for a few months and seeking feedback from Parties, before deciding how to proceed further. We will update the Panel on the feedback we receive and our intended next steps before we take any further action.

We will also continue to work on identifying specific streamlining improvements, liaising with Sub-Committees and Gowling on these. We will keep the Panel informed on progress with this work.

5. Recommendations

The Panel is requested to **ENDORSE** SECAS's proposed improvements to the management of SEC documentation and the approach to taking these forward.

David Kemp, SECAS Team

6 December 2019