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DP110

‘Aligning SEC Appendix D with DCC Processes’

Modification Report

Version 0.1

About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

Contents

1. Summary.....	3
2. Issue.....	4
Appendix 1: Progression timetable	5
Appendix 2: Glossary	6

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1. Summary

This proposal has been raised by Gordon Hextall on behalf of the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA).

During a recent audit carried out in June 2019 under Smart Energy Code (SEC) Appendix C 'SMKI Compliance Policy', the auditor identified non-compliances where the Data Communications Company (DCC) internal processes did not conform to the processes set out in SEC Appendix D 'SMKI Registration Authority Policies and Procedures' (SMKI-RAPP).

The DCC and the SMKI PMA have agreed changes that should be made to SEC Appendix D. The resulting changes agreed by the DCC and the SMKI PMA will ensure that the independent assurance is satisfied.

SEC Appendix D now requires amendments so that it is aligned with the processes agreed by the DCC and SMKI PMA.

2. Issue

What are the current arrangements?

SEC Appendix C requires the DCC to submit to a SMKI Independent Assurance Scheme, approved by the SMKI PMA. The scheme approved by SMKI PMA and meeting the requirements set out in SEC Appendix C is 'tScheme'.

The most recent audit was carried out in June 2019 and the auditor identified non-compliances where the DCC internal processes did not conform to the processes set out in SEC Appendix D 'SMKI Registration Authority Policies and Procedures'.

At the request of the SMKI PMA, the DCC was asked to investigate the discrepancies. and make recommendations to the SMKI PMA for changes to the SEC, for example, where the original SEC processes have been replaced by a more efficient process.

What is the issue?

During live operations, the DCC has evolved the processes set out in SEC Appendix D to operate more efficiently. The SMKI Independent Assurance Scheme has identified discrepancies between the SEC defined processes and the actual DCC practices.

On 17 December 2019, the DCC presented the SMKI PMA with the changes that it proposed to be made to the SEC Appendix D. SMKI PMA members went through each proposed change and made some amendments. The resulting changes are acceptable to the DCC and to the SMKI PMA and will ensure that the independent assurance is satisfied.

SEC Appendix D now requires amendments so that it is aligned with the processes agreed by the DCC and SMKI PMA.

What is the impact this is having?

If these changes are not made, the discrepancy between the obligations in the SEC and the DCC actual live practices would persist. There will be no impact on SEC Parties as these practices are already in use.

Appendix 1: Progression timetable

The proposed timetable for DP110 is for the Draft Proposal to be presented at the next Change Sub-Committee (CSC) meeting for decision and to Panel in February for conversion to a Modification Proposal. If the Panel agrees it should become a modification proposal it should then proceed directly to the Report Phase, as it has been discussed and agreed by the DCC and the SMKI PMA.

In order to do this, the draft legal text must be approved by Panel. The Smart Energy Code Administrator and Secretariat (SECAS) is preparing the draft legal text, which will be published on the SEC Website ahead of the Panel meeting for comment.

Timetable	
Action	Date
CSC review the issue	28 Jan 20
Panel convert Draft Proposal to Modification Proposal	14 Feb 20
Modification Report Consultation	17 Feb – 6 Mar 20
Change Board vote	25 Mar 20

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
SEC	Smart Energy Code
SMKI	Smart Metering Key Infrastructure
SMKI PMA	SMKI Policy Management Authority
SMKI-RAPP	SMKI Registration Authority Policies and Procedures