

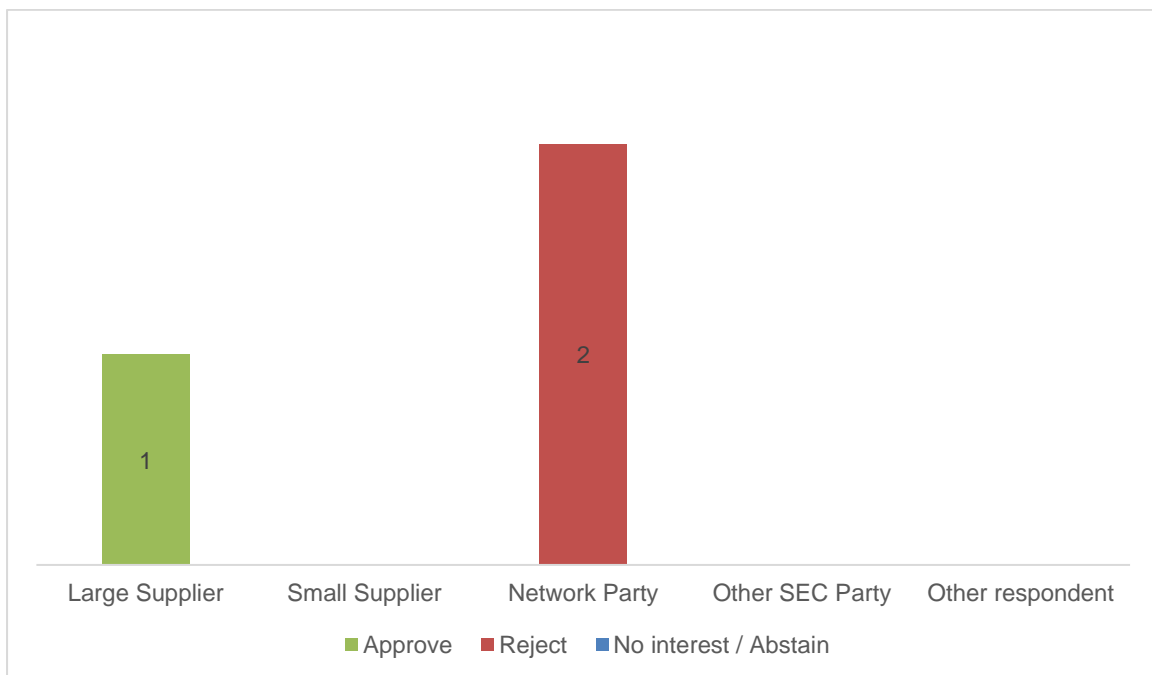
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# MP088 ‘Power to raise modifications’ Modification Report Consultation responses

## About this document

This document contains the full collated responses received to the MP088 Modification Report Consultation.

## Summary of responses



## Question 1: Do you believe that MP088 should be approved?

Question 1			
Respondent	Category	Response	Rationale
Western Power Distribution	Network Party	Reject	We don't believe that this modification better facilitates any of the SEC Objectives and therefore reject.
EDF	Large Supplier	Approve	We agree that MP088 would better facilitate SEC Objective (g) by enabling Modifications to be raised more quickly and by the groups/parties that have identified the need for a change to be made. This should improve the timeliness and efficiency of the Modifications process.
Electricity North West	Network Party	Reject	We do not believe the General SEC Objectives would be better facilitated by this change indeed it could have a negative impact on (g) which is ' <i>to facilitate the efficient and transparent administration of this Code</i> ', for example the potential difficulty of the Panel being able to independently review a proposed change if the Panel had also raised the change. The ability to ask different parties to raise a draft change that meet a test to a party of being beneficial for their stakeholders exists so the defect is unclear.

## Question 2: Please provide any further comments you may have

Question 2		
Respondent	Category	Comments
<b>Western Power Distribution</b>	Network Party	<p>Whilst we understand the problem being raised and do not want to see modifications being blocked or delayed, we question whether this is truly a problem. It appears in the consultation that although there are a number of modifications that were initiated by the Panel, SECAS or a Sub Committee, all of these modifications have been raised and are in the process, therefore implying that the current process is not a blocker. There is no evidence to advise time delays caused by trying to find a volunteer proposer.</p> <p>Although some codes allow the Code Administrator to raise proposals, other codes, such as MRA and BSC don't and this does not cause an issue. We would question whether if a committee felt that a modification was required, why a member of the committee would not be willing to raise that change. Could this be included as a requirement in the membership? Alternatively, the MRA allows MRASCO to raise a Change Proposal as long as there is an appropriate sponsor, would this potentially be more suitable?</p> <p>Another question we have is around conflict of interest if you allowed a committee to raise a modification, who will then also be the working group, (we understand that there might be certain circumstances where this is appropriate, i.e. specialist security areas).</p> <p>If this modification is approved, we seek clarification on how the Panel or a Sub Committee agree a modification should be raised by them? Is it by vote and if so majority or unanimous? Is it appropriate for SECAS to be able to raise modifications without this type of validation or approval?</p>
<b>EDF</b>	Large Supplier	

Question 2		
Respondent	Category	Comments
Electricity North West	Network Party	We already have a concern about the number of changes that have been raised since the SEC was implemented and MP088 could result in more. Would it be appropriate to wait for the outputs from the BEIS/Ofgem consultation on reforming the energy codes before progressing such changes?