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Action:	**For Discussion**

New Draft Proposals and Modification Proposals

1. Purpose

This paper provides a summary of the new Draft Proposals raised and the Draft Proposals that have converted to Modification Proposals in the last month. Copies of the draft Modification Reports for each proposal are attached to this paper.

We seek any initial comments the Technical Architecture and Business Architecture Sub-Committee (TABASC) may have on these proposals at these stages in the framework, and agreement on which proposals it will want to provide further input on as they progress.

2. New Draft Proposals

This section lists the new Draft Proposals submitted in the last month and which have entered the Development Stage. At this point in the process, we are focused on assessing and clarifying the issue identified, the impacts this is having (including the impact of doing nothing), and the context of this issue within the Smart Energy Code (SEC). Solutions will not be discussed until the Change Sub-Committee (CSC) has agreed the problem statement has been fully defined.

We invite any views from the TABASC on the issue identified under each proposal, the impacts this may be having, and any areas the Proposer may need to consider further. If you require any further information on a Draft Proposal, the Modification Reports of each Draft Proposal can be found in the attachments to this paper or on the respective proposal's webpages via their hyperlinks.

DP112 'Setting the Privacy Assessment Assurance Status'

DP112 has been raised by Simon Crouch of Utiligroup. The Lead Analyst from SECAS is Bradley Baker.

In SEC Section I2.32, there are four potential assurance statuses a Party may receive after completing their Full Privacy Assessment (FPA). While the first two, '1. Approved' and '2. Approved subject to', are clear to understand, '3. Provisionally approved' and '4. Deferred' are thought to be less clear, and thus could result in a level of confusion for a Party seeking to complete their User Entry Process Tests.

DP113 'Unintended Data Disclosure when using SR8.2'

DP113 has been raised by Ian Speller of the DCC. The Lead Analyst from SECAS is Joe Hehir.

DCC Service Users routinely query the DCC System to discover or validate various customer, property or meter data as part of their business processes. Queries can be generated using various identifiers, including the MPxN, address and postcode, which are all treated as personal data under General Data Protection Regulation (GDPR).

If a DCC Service User submits a query to the DCC System with a house name and postcode, but without a unique reference, the results may return data of an unintended property due to the 'matching postcode' in place. The Proposer believes that could include unintended personal data, which would be a breach of GDPR.

DP114 'Alt HAN P2P Charging Data'

DP114 has been raised by David Lyons of E.ON. The Lead Analyst from SECAS is Harry Jones.

The SEC details how the Alternative Home Area Network Company (Alt HAN Co) sets out its charging methodology and how it will recover costs in SEC Section Z 'Alt HAN Arrangements'. Currently there are nine data items that Alt HAN Co is obligated to submit to the DCC each year to help determine the value of these charges. Some of these data items aren't wholly obtainable and therefore the DCC can't accurately complete the calculation used to determine one of the main charges – the 'average monthly incremental cost'. This results in DCC recovering charges from Supplier Parties that don't match the costs they incur. With the current text in SEC Section Z, the DCC will continue to inaccurately charge Supplier Parties.

DP115 'Changes to the NCSC Good Practice Guides'

DP115 has been raised by Gordon Hextall on behalf of the SMKI PMA. The Lead Analyst from SECAS is Joe Hehir.

A SECAS review of the SMKI Document Set has found that it contains several references to Good Practice Guides (GPGs) that have been discontinued and will not be replaced. The SMKI PMA wishes to address this by aligning the SEC with these changes and by making available authorised replacement SMKI PMA guidance.

DP116 'Service Request Forecasting'

DP116 has been raised by Graeme Liggett of the DCC. The Lead Analyst from SECAS is Bradley Baker.

Currently, for each quarter of the year, DCC Users must submit to the DCC an eight-month forecast of the number of Service Requests that the User anticipates sending. It is believed that each forecast takes an average of two days for each User to complete. These forecasts are intended to assist in managing demand on the DCC User Interface Services. The DCC has raised concern that the accuracy of the forecasts does not meet the level required to produce useful data that will improve the management of demand on the DCC User Interface Services.

DP117 'Bulk CH returns'

DP117 has been raised by Sasha Townsend of the DCC. The Lead Analyst from SECAS is Harry Jones.

DCC Users must send an individual Service Request to notify the DCC of each Communications Hub return. This takes a significant amount of time and effort when multiple CHs require return. DCC Users have stated that this is not a sustainable approach in dealing with returns.

3. Recommendations

The TABASC is requested to:

- **DISCUSS** the proposals in this paper; and
- **PROVIDE** any views or comments.

Harry Jones

SECAS Team

27 February 2020