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MP099 ‘Incorporation of multiple Issue Resolution Proposals into the SEC – Batch 4’

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP099 Refinement Consultation.

Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
EDF	Large Supplier	No	<p>While we agree with the content of these IRPs and that they should be implemented, as agreed at TSIRS, we do not agree that new sub-versions of the Technical Specifications should be created. This is not the approach proposed for other changes (namely MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4).</p> <p>Creation of new sub-versions of GBCS would require all devices installed compliant with the previous sub-version to be upgraded, and any devices that could not be upgraded would no longer be compliant with supplier obligations to maintain devices to a valid version the Technical Specifications. This is mainly a concern for GBCSv3.3 as devices are already being developed to be compliant with version 3.2 and would therefore need to be upgraded as a result of this change.</p> <p>We believe that these changes could be included in GBCSv4.0; it is not clear why any new sub-versions would be required.</p>

Question 2: Will there be any impact on your organisation to implement MP099?

Question 2			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	We will need to ensure devices that we procure and are responsible for are compliant with the new version of GBCS.

Question 3: Will your organisation incur any costs in implementing MP099?

Question 3			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	It is difficult to accurately identify the costs associated with any single change to the device specifications. The cost of this change will be higher if we are required to upgrade devices we have already installed to be compliant with the new version of GBCS.

Question 4: Do you believe that MP099 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	We agree that implementing this change will better facilitate SEC Objective (a), as these IRPs resolve issues with the Technical Specifications and will ensure devices operate correctly.

Question 5: Noting the costs and benefits of this modification, do you believe MP099 should be approved?

Question 5			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	We agree that these changes should be made, as noted above the question is how they should be implemented in a new version of GBCS.

Question 6: Do you agree with the proposed implementation approach?

Question 6			
Respondent	Category	Response	Rationale
EDF	Large Supplier	No	See answer to question 1.

Question 7: Do you agree that the legal text will deliver MP099?

Question 7			
Respondent	Category	Response	Rationale
EDF	Large Supplier	Yes	We have not identified any issues with the legal text

Question 8: Please provide any further comments you may have

Question 8		
Respondent	Category	Response and Rationale
EDF	Large Supplier	We are concerned that there is a lack of clarity in regards to the overall strategy for implementing device related changes and how changes should be included in new versions of the Technical Specifications. This is one of a number of changes in progress which require changes to be made to the Technical Specifications, while these changes are separate the way that they are implemented needs to be more coordinated, and the impact on parties resulting from creating new sub-versions of devices (which impacts devices that are installed and in the supply chain) needs to be considered.