SEC
Smart Energy Code

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Smart Energy Code

DP133

‘Consequential changes to SEC Section G’

Modification Report

Version 0.2

23 June 2020

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

Contact

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1. Summary

This proposal has been raised by Simon Crouch from Utiligroup.

Currently in the SEC Section G, G1.7 lists exclusions for Export Suppliers and Registered Supplier Agents (RSAs). There it states if you are a Data Communications (DCC) User who acts in either of those two User Roles, then SEC Section G's obligations don't apply except for the ones listed under G1.7. The "Shared Resources" section isn't currently listed under G1.7, which means Export Suppliers and RSAs can ignore those obligations whilst not being in breach of the SEC.

The solution is to add the "Shared Resources" Sections G5.25 – G5.28 to G1.7 so that Export Suppliers and RSAs are still obligated to follow these requirements as per the original intention of SECMP0040 'Changes to how DCC Users schedule and carry out User Security Assessments after completion of the User Entry Process'.

2. Issue

What are the current arrangements?

Currently SEC Section G1.7 lists exclusions for Export Suppliers and RSAs. There it states if you are a User who acts in either of those two User Roles, then SEC Section G's obligations don't apply except for the ones listed under Section G1.7.

SECMP0040 'Changes to how DCC Users schedule and carry out User Security Assessments after completion of the User Entry Process' implemented changes to SEC Section G which had impacts on Export Suppliers and RSAs.

What is the issue?

With the existing arrangements, Export Suppliers and RSAs are not obligated to follow the full list of changes made under SECMP0040. As a result, the "Shared Resources" section in SEC Section G which covers Sections G5.25-G5.28 are not compulsory for Export Suppliers and RSAs to follow.

What is the impact this is having?

The impact of this is that the "Shared Resources" obligations do not apply for Export Suppliers and RSAs. By not explicitly including these sections in the SECMP0040 legal text, the SEC allows this to continue until those entries are added to the list in G1.7.

3. Solution

Proposed Solution

The Proposed Solution is to make a consequential change to SEC Section G. By adding the “Shared Resources” Sections G5.25-G5.28 to Section G1.7, the Export Suppliers and RSAs will be obligated to follow these requirements.

Without this, the SEC currently reads as if Export Suppliers and RSAs are exempt from following the obligations set out through Sections G5.25-G5.28.

The redlined legal text to deliver this consequential change can be found in Annex A.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
	Large Suppliers		Small Suppliers
	Electricity Network Operators		Gas Network Operators
	Other SEC Parties		DCC

No SEC Parties will be impacted by the proposal, as it will only deliver a clarification to the solution implemented through SECMP0040

DCC System

There are no impacts to the DCC Systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section G 'Security'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Consumers

There are no impacts to consumers.

Other industry Codes

There are no impacts on other industry Codes.

Greenhouse gas emissions

There are no impacts on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this proposal.

SECAS costs

The Smart Energy Code Administrator and Secretariat (SECAS) costs to implement this modification is two days of effort amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

There will be no cost to SEC Parties.

6. Implementation approach

Recommended implementation approach

The Smart Energy Code Administrator and Secretariat (SECAS) is recommending an implementation date of:

- **5 November 2020** (November 2020 SEC Release) if a decision to approve is received on or before 22 October 2020.

The Panel has already baselined the scope of the November 2020 SEC Release, but can choose to add further modifications by exception if it is deemed either necessary or efficient to do so.

The Proposed Solution should be implemented as soon as is reasonably possible to add the clarification. This will ensure that Export Suppliers and RSAs are not exempt from these obligations. It could be deferred to the February 2021 SEC Release, but given the minor but important change to the SEC it would deliver, SECAS recommends it be included in the November 2020 SEC Release.

7. Assessment of the proposal

Observations on the issue

The Change Sub Committee (CSC) will give its view on this proposal on 30 June 2020.

No other comments have been received on the issue highlighted by this proposal.

Views against the General SEC Objectives

Proposer's views

The Proposer believes the proposal better facilitates General SEC Objective (g)[1]. This is due to aligning the SEC to the technical requirements of solutions and ensuring the two are identical.

[1] (g) To facilitate the efficient and transparent administration and implementation of the SEC.

This document has a Classification of **White**

Appendix 1: Progression timetable

After being raised on 22 May 2020, the Draft Proposal will be presented to the CSC on 30 June 2020. At the CSC, it will be recommended to be converted to a Modification Proposal. It will then be presented to the Panel on 17 July 2020 to be converted to a Modification Proposal and proceed directly to the Report Phase.

Timetable	
Event/Action	**Date**
Draft Proposal raised	22 May 2020
Presented to CSC for initial comment and recommendations	30 Jun 2020
Panel converts Draft Proposal to Modification Proposal	17 Jul 2020
Modification Report approved by Panel	17 Jul 2020
Modification Report Consultation	20 Jul – 7 Aug 2020
Change Board vote	26 Aug 2020

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**
CSC	Change Sub-Committee
DCC	Data Communications Company
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat