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# Process for Incorporating Issue Resolution Proposals and Non GBCS Non Mandated Alerts into the SEC Consultation responses

## About this document

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This document contains the full collated responses received to the Smart Energy Code (SEC) consultation relating to the Process for Incorporating Issue Resolution Proposals (IRPs) and Non-Great Britain Companion Specification (GBCS) Non Mandated (NGNM) Alerts into the SEC.

## Question 1: Do you agree with the outlined approach for implementing IRPs into the SEC?

Question 1			
Respondent	Category	Response	Rationale
ScottishPower	Large Supplier	Yes	The approach promotes a more efficient governance process.
Centrica (British Gas)	Large Supplier	Yes	Although we agree with / support the approach being suggested, we have fed into and agree with the issues and comments raised within the EUK response.
Energy UK		See rationale	<p>Energy UK welcomes these proposals from SECAS, off the back of SECAS' engagement with BEIS and DCC on the matter. Energy UK and members have previously raised concerns around this area at the BEIS TSIRS and BEIS TBDG meetings, so it is helpful that steps are being taken to address these concerns. The work done by SECAS with BEIS and DCC to get to this stage is appreciated. Energy UK broadly agrees with the proposals; however, we have a number of overarching points for consideration as well as areas suggested for further clarification – these are captured within the rationale below.</p> <p>Overarching points that we believe need to be considered:</p> <ol style="list-style-type: none"> <li>1. The existing and proposed process has huge reliance on the timeliness and robustness of DCC's impact assessments (PAs / IAs) of SEC Mods. For a number of years, industry concerns have been highlighted on this issue within BEIS SMIP Transition Governance forums and SEC Enduring Governance forums, and with Ofgem. It is important that DCC provides assurance and details of the steps it is taking to address industry's longstanding concerns on DCC's impact assessment of SEC Mods. Without that, it is likely the new proposed approach for IRPs will suffer from the same issue.</li> </ol>

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			<p>2. The discussions at the BEIS TSIRS meetings in 2020, which was the trigger for these proposals, identified that part of the issue is the internal disconnect / disjoint between the various parts of DCC when assessing and progressing change, which ultimately slows down and frustrates the process when IRPs are packaged up within SEC Mods. Therefore, it is important to get DCC confirmation of the steps being taken to address this to ensure internal DCC functions are working together and providing clear, timely and consistent input into the SEC Mod process for these IRPs.</p> <p>3. Once an IRP has been agreed and closed by BEIS at TSIRS, that IRP should not be revisited during the SEC Mod process to change any of its already agreed requirements – it is important that the SEC Mod process ensures that IRPs are not changed. The process should also be cognizant of the Competition Act as part of this to ensure that no party is proposing new solutions to meet their needs (or potentially for commercial benefit) over that of other DCC Users and / or SEC Parties.</p> <p>Specific comments on the proposals that we seek further clarity on:</p> <p>a) It is our assumption that for each of the Category 1, 2 or 3 IRPs, the reference to impact on DCC “Systems” means the overall DCC solution i.e. systems and CHs. Please confirm the assumption.</p> <p>b) It is important to note that for each of the Category 1, 2 or 3 IRPs, some of these may impact device manufacturers, e.g. meters, IHDs, PPMIDs, etc. This may need recognition within the proposed process, as device manufacturers will have their</p>

Question 1			
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			<p>own implementation plans for design, build, test and firmware upgrades – expected to be different to DCC’s timelines.</p> <p>c) Linked to the above two points a and b on impacts on CHs and devices, it would be helpful to clarify the related timing approach for updating SEC Schedule 11 (TSAT), if any potential changes to the IVP or MVP dates are required as a result of changes to IRPs or following a Tech Specs uplift.</p> <p>d) DCC currently as part of the development of BEIS driven IRPs provides BEIS with an early technical view from its DCC GBCS Working Group to help inform BEIS when developing the IRP. This DCC (and its Service Providers) early technical assessment is referred to in the BEIS Issues Management Process. We would therefore suggest that as soon as a BEIS driven IRP is closed / agreed by TSIRS then DCC ought to start the impact assessment process. This has the benefit of making an early start so that when the SEC Mod formally arrives (batching up the IRPs) then DCC has already done some work on the IRP’s assessment – helping expedite the process. We believe this would help in part with our overarching point 1 earlier on wider concerns with DCC impacts assessments. Additionally, looking further ahead to when BEIS hands over the Issues Management Process from SMIP Delivery / Transition Governance to SEC Enduring Governance, it would be good to understand if the DCC GBCS Working Group continues to provide input (e.g. into TABASC) or it ceases to exist.</p> <p>e) The proposed annual process for raising SEC Mods for incorporating Category 1 IRPs into the SEC means it could be at least two years, likely longer, before DCC</p>

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			<p>implements an IRP in its solution, assuming a sunny-day scenario. We would suggest consideration of how this could be further expedited (linked to our earlier overarching point 1 on timeliness of DCC impact assessments) and potentially assessing the merits of SEC Mods being raised more than once a year, e.g. twice a year. Furthermore, these suggested timelines do not cater for the costs review once DCC provides its impact assessment, so it is likely to be longer. We would also suggest clarifying who will be responsible for undertaking the costs review.</p> <p>f) The proposals for separate release timelines for different categories of IRPs appear to over-complicate the process with no clear benefit. Whether an IRP is a Category 1, 2 or 3 should not really drive the point within the year for when the IRP should be implemented. It could be argued that Category 1 and 2 IRPs should be implemented at the same time; this would allow for the DCC testing to be consolidated and be more cost effective. Generally speaking, industry prefers certainty on lead times and the number of releases, but it is important the process allows for flexibility to reduce lead times when it suits.</p> <p>g) It would be helpful to understand what the future approach is intended to be for IRPs once BEIS hands over its Issues Management Process from SMIP Delivery / Transition Governance to SEC Enduring Governance under SEC Panel / TABASC1, e.g. will IRPs as a concept remain or will a new approach needs to be established. This also links to our point d above in respect of input from the DCC GBCS Working Group.</p>

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			<p>h) The consultation refers to BEIS driven IRPs only, so we assumed this also covers BEIS driven CRPs (Change Resolution Proposals), as CRPs are also part of the BEIS Issues Management Process within SMIP Delivery.</p>
Utilita	Large Supplier	<p>Yes, Utilita broadly agrees with the approach for implementing IRPs into the SEC</p>	<p>Utilita supports developing a clear structure for incorporating IRPs into the SEC, working towards creating both efficiency and transparency in the management of this process.</p> <p>Although we broadly approve, we have overarching concerns around the timelines proposed:</p> <ul style="list-style-type: none"> <li>We believe there is an over-reliance on DCC to produce quality assessments on time and the possibility of deadlines to be missed remains. The timings associated with DCC producing PAs/IAs should be regularly reviewed to ensure that these are produced in a timely manner. To do this, there needs to be good oversight/management of DCC producing PAs/IAs within the proposed timelines. This could possibly be managed in the SEC Change group.</li> <li>The possibility of a 12-month lead time for implementing IRPs into the SEC is a concern. Figure 1 proposes a timescale where a PA takes three and half months while the IA is three months. Perhaps these be shortened to reduce the 12-month lead time so that the implementation is not in danger of being delayed by another year.</li> </ul> <p>In the proposed approach, for Category 1 IRPs there is a minimum of 2 years (likely to be more, if not a straightforward process) before DCC implements them into DCC's Systems. With only having one cut-off date for each category, each year there is potential that IRPs could be raised after a cut-off date and therefore be waiting for release for at least a year longer than necessary. To mitigate this risk, IRP related SEC Mods could be raised at least twice a year with releases aligned with the SEC Release calendar.</p>

Question 1			
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OVO	Large Supplier	Yes	We fully support, and have actively fed into, the EUK response on all the questions. In addition to their response we would like to call out that we support the outlined approach but have concerns that any changes, that are agreed and signed off via TSIRS, should not then be reopened and separate conversations then be had with the same parties already previously involved. We have seen instances where it would be in some party's commercial best interests for a solution or issue to be resolved in a very specific manner. That may go completely against either the BEIS intent of that agreed with others in the TSIRS process. That does not seem to be fully covered in the proposal. We would also like to echo the comments made by EUK on the matter of the disjoint within the DCC and the breakdown when it comes to issues affecting DCC's Service Providers. If the DCC is providing a response that needs to be cognizant and including of the overall DCC ecosystem and all the parties that make up that entity and not just one part and then we're left having the cost and delay in getting outputs from the other areas.
EDF	Large Supplier	EDF broadly agrees with the proposal, with the comments set out in the rationale.	<p>A few concerns exist:</p> <ol style="list-style-type: none"> <li>1. SEC Mod process has historically been very slow, partially as a result of the internal processes of DCC impact assessments. It is noted that this is being carried over from the existing BEIS driven process to the new SECAS driven one so the same issues may arise.</li> <li>2. Is there a mechanism for expediting "emergency" IRPs? The proposal mentions such a mechanism but not how it would operate.</li> <li>3. While the annual November release for IRPs will create a more predictable change cycle, it may not (at least initially) fit with device manufacturer development or maintenance cycles to implement changes. The change cycle appears to be geared towards DCC needs mainly.</li> </ol>
Landis+Gyr	Other SEC Party	No	Whilst we agree with the approach for the DCC ( and the logic for this ), this proposal neglects to consider the approach on device manufacturers and gives little, if no, time for

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			IRPs to be considered by device manufacturers, as is currently addressed by the BEIS TSIRS process. Whilst an IRP might be classified as Category 3 for DCC it could well be Category 1 for device manufacturers.
<b>E.ON</b>	Large Supplier	Yes	We agree that it is important to have a well defined and documented approach to implementing IRPs into the SEC. It does also allow for efficiencies for less affecting IRPs that can be introduced in a shorter timescale than those that are more involved.
<b>SSEN</b>	Network Party	Yes	SSEN agree that the proposed process and timelines assist in providing an adequate timeframe to review, refine and implement IRP's.
<b>Western Power Distribution</b>	Network Party	Yes	We believe that the outlined approach provides a suitable enduring process for implementing IRPs into the SEC in a regular and efficient way and welcome an enduring process.
<b>EUA</b>	Trade Association	Partly	<p>The implementation timescales for Category 1 and Category 2 IRPs provide the framework and timelines which seems appropriate and can be worked to, but that is not the case for Category 3 IRPs. It is assumed that the implementation date as outlined for Category 3 IRPs is the IVP start date and therefore not the date by which devices / meters will have this functionality incorporated within its firmware, just the first point at which the functionality will be able to be incorporated.</p> <p>That note, Category 3 IRPs, which dictate a change / impact to a Devices on the HAN need appropriate time for socialisation, specification development and agreement (normally via TSIRs). Following this period, Device Manufacturers will need to design, develop and test changes to firmware. Therefore, timescales for these IRPs are not appropriate.</p>
<b>DCC</b>	DCC	Yes	DCC supports the proposed approach to bring the implementation of IRPs into the SEC into the enduring SEC governance arrangements. We have contributed to the development of



Question 1			
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			<p>this proposed process. An annual modification cycle for each category, supported by categorisation via quarterly initial assessments, will provide a clear and structured approach, more efficient than raising modifications throughout the year. One point to note is that initial views on categorisation during discussion in TSIRS (or TABASC once that change takes place), may change once DCC has carried out a Preliminary Assessment. Consequently, the categorisation and therefore the batching and lead time would also change.</p>

## Question 2: Are the stated anticipated lead times between Modification Proposal approval and implementation sufficient for your organisation to implement changes?

Question 2			
Respondent	Category	Response	Rationale
Scottish Power	Large Supplier	Yes	We agree that these lead times should be sufficient
Centrica (British Gas)	Large Supplier	Yes	The anticipated lead times proposed do seem appropriate, however, as with the existing process for SEC Releases, we are supportive of having a degree of flexibility that allows for prioritisation of change and reduced lead times where the materiality of the change, or urgency, justify so.
Energy UK	Trade Association	Energy UK does not have specific views on this point	We would suggest views on this are needed from impacted parties directly affected given the varying implementation approaches between parties and associated timelines for design, build, test and implementation of any change. We expect Energy UK members to respond directly to SECAS on this point. Additionally, we suggest that SECAS seeks views from DCC (in terms of both its systems and CH providers) and device manufacturers given that IRP driven changes will likely to be device affecting in some cases – i.e. for meters, IHDs, PPMIDs, CADs, etc.
Utilita	Large Supplier	N/A	Please see overarching points in Question 1 with regards to improving time efficiencies with IRPs implementation process
OVO	Large Supplier	Yes	The issue of meeting the lead times will not be with DCC Users, it will be with the likes of the DCC and Device Manufacturers. We are driven by SEC changes, once agreed.
EDF	Large Supplier	Yes	EDF does not have a specific concern about these lead times. Device manufacturers may have to align to the proposed November release dates but we note that the schedule is

Question 2			
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			<p>proposed as an aim and that the schedule may be flexed depending on the type of IRP or the urgency of the IRP.</p> <p>It should be clarified by what process the schedule will be adjusted and the revised plan be agreed and published.</p> <p>EDF would be impacted if the lead times and implementation dates resulted in compression of device installation validity dates, whereby older stocks of devices are required to be installed by a given date in the TSAT.</p>
<b>Landis+Gyr</b>	Other SEC Party	No	<p>In the case of IRPs which affect manufacturers, if they fall in the worst case Category 3 ( but also to an extent Category 2 ) they present an impossibly short time for manufacturers to respond and there is not enough to address how manufacturers will have seen any of the IRPs prior to this point. In the case of a change to a Stack, there is typically a 6 – 9 month lead time for implementation, which, if it emerges from a Category 3 IRP, gives manufacturers only a short (few weeks) timescale to assess. It is not feasible for DCC to assess impacts upon devices to assess the equivalent categorisation of IRPs for manufacturers.</p> <p>In the current process, IRPs are socialised by BEIS and there are opportunities for manufacturers to assess impact and feedback via trade associations from the point that they are raised, which allows modification and alignment, and this proposal acknowledges that BEIS will no longer carry this out but does not address how this important gap will be filled.</p>
<b>E.ON</b>	Large Supplier	No	<p>We are not sure that this question can be answered sufficiently. As stated, every IRP is reviewed independently to assess the timescales, and the lead times proposed are only those of the DCC readiness to implement. So while in principle 12 months and 24 months</p>

Question 2			
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			should be sufficient, an IRP that is of little impact to the DCC may have larger impacts to manufacturers or other industry parties, of which these are not considered in the categorisation on the IRP. Additional to the timescales, the offset of the modification reports for the three categories of IRP could mean that changes are made during the implementation stage of a lower category change for the same release. Careful consideration needs to be taken to ensure an IRPs do not impact changes already in the implementation phase of lower category IRPs.
<b>SSEN</b>	Network Party	Yes	SSEN believe that the lead times proposed for each category are sufficient to review and implement changes required
<b>Western Power Distribution</b>	Network Party	Yes	We agree that the proposed lead times are suitable, especially and allow enough time for refinement and a suitable amount of time from approval to implementation. We are of the opinion that potential industry feedback for different lead times will be provided by TABASC at the time of discussion prior to the IRP being included into the modification.
<b>EUA</b>	Trade Association	No	As outlined above, for Cat 3 changes there needs to be considerably more time provided. The Smart eco-system is complex, with much of that complexity translated / incorporated into the actual Smart Devices connected to the HAN. Therefore, there needs to be appropriate time and process developed to socialise and develop industry agreement to make changes (therefore time to agree design, develop, test and gain appropriate certification of any changes to devices). This needs to be reflected within Cat 3 timelines.
<b>DCC</b>	DCC	Yes	DCC has contributed to developing these proposals. We consider the proposed default timelines for the implementation of the three categories of IRP to be realistic, noting the proviso above that there may be variation to these schedules as individual IRPs are assessed and implemented.

### Question 3: Do you agree with the outlined approach for implementing NGNM Alerts into the SEC?

Question 3			
Respondent	Category	Response	Rationale
ScottishPower	Large Supplier	Yes	Again, this will provide for a more efficient governance process.
Centrica (British Gas)	Large Supplier	Yes	Although we agree with / support the approach being suggested, we have fed into and agree with the issues and comments raised within the EUK response
Energy UK	Trade Association	Energy UK notes that these proposals make sense; however, we believe further clarification is needed.	<p>Areas for further clarification:</p> <ul style="list-style-type: none"> <li>• Categorising the implementation of these NGNM Alerts into the SEC at the same level as Category 1 IRPs seems unnecessary / an over-kill as the impact on DCC systems is in theory only limited to the Parse and Correlate software. It is our understanding the DCC systems in respect of these NGNM Alerts is already capable of forwarding these NGNM Alerts to DCC Users (with a description of “not in GBCS” or similar), so it would just be an update to the P&amp;C Software to ensure new NGNM Alerts are included with the correct description.</li> <li>• SEC Mod 90 is also looking at incorporating NGNM Alerts into the SEC and so it is unclear what the interplay is between SEC Mod 90 and the proposals captured here, as the objectives appear to be similar. If the objectives are different, it would be helpful to clarify the intent of the proposals here and how they differ to the in-flight SEC Mod currently in Refinement.</li> </ul>
Utilita	Large Supplier	Yes, this proposal makes sense	Considering the available/possible choices for a solution to MP090 is not yet definite as it goes through the Refinement process, we agree with this approach to avoid unnecessary delays.

Question 3			
Respondent	Category	Response	Rationale
<b>OVO</b>	Large Supplier	Yes	Any formalisation of the process is fully welcomed and supported. We agree with the approach set out. We expect any Parties that create a NGNM alert are made fully aware of the options available to them and what they need to do in relation to getting their desired outcome.
<b>EDF</b>	Large Supplier	Yes	EDF welcomes the change to include the NGNM alerts into the SEC along the same process lines as the IRP process.  We do not believe that they require the level of DCC assessment as Category 1 IRPs as they only really impact the device manufacturers and suppliers receiving the new alerts.  How does this proposal relate to SEC Mod 90, which looks to address the same issue.
<b>Landis+Gyr</b>	Other SEC Party	Yes	The process to incorporate the NGNM alerts is needs to be addressed and the timescale for the incorporation is sensible.
<b>E.ON</b>	Large Supplier	No	We agree in principle the requirements and process set out but would like to understand further why Category 1 was chosen as the model to follow for these. While we appreciate there is DCC work involved, once the process has been completed once, the precedent has been set and the impact assessments would be near identical for every instance thereafter. The text also mentions they require a 3 month implementation, so we believe these changes would align better with Category 2 timescales.
<b>SSEN</b>	Network Party	Yes	Having a clearly defined process with sufficient lead times will allow SSEN to understand new potential impacting alerts being introduced into the SEC.
<b>Western Power Distribution</b>	Network Party	Yes	We believe that the outlined approach provides a suitable enduring process for implementing NGNM Alerts into the SEC in a regular and efficient way and welcome an enduring process.

Question 3			
Respondent	Category	Response	Rationale
EUA	Trade Association	No	<p>Some of our members are concerned that the time as outlined for Cat 1 changes seems a disproportionate long time to introduce NGNM Alert functionality, which will stifle innovation by suppliers and device manufacturers. It may also cause suppliers issues when they inherit devices which send NGNM alerts they do not understand and cannot configure. Therefore, in order to mitigate this issue, a fast track process could be considered and agreed with Industry.</p> <p>The addition of NGNM Alerts is a known quantity of work for DCC to manage and as such a PA/IA should not be necessary so could be managed within a CAT3 timeframes (please also note comments on Q1 and Q2).</p>
DCC	DCC	Yes	DCC supports the proposed approach to bring the implementation of NGNM Alerts into the SEC into the enduring SEC governance arrangements. We have contributed to the development of this proposed process.

## Question 4: Do you agree with a targeted one uplift of the Technical Specification per year?

Question 4			
Respondent	Category	Response	Rationale
ScottishPower	Large Supplier	Yes	This should limit the need for any reciprocal uplift to our own systems.
Centrica (British Gas)	Large Supplier	Yes	This seems a sensible and consistent approach. However, as per our response to Q2, we would expect the process to allow for flexibility when any changes are deemed to be urgent or necessary to implement outside of the scheduled annual uplift.
Energy UK	Trade Association	-	Energy UK believes this appears to be a sensible approach and provides clarity and certainty for SEC Parties and DCC Users. It is also our understanding that if there is a material or urgent requirement to uplift the Tech Specs (e.g. as a result of a security issue) then the SEC allows for a standalone release or further uplifts.
Utilita	Large Supplier		<p>Looking at the whole proposed approach alongside the annual up-lift we don't agree that this is the best solution unless there are changes made to other areas in the modification process.</p> <p>While we agree one uplift provides clarity, we are concerned that this may only create backlogs of IRPs due for release years down the line.</p> <p>This may be easily resolved if there were min. two SEC Mods per Category year and a reduction in assessment time needed from DCC.</p>
OVO	Large Supplier	Yes	We agree with the uplift proposal
EDF	Large Supplier	EDF agrees that the annual batch approach.	As mentioned in the response to Q2, EDF would ask how the schedule is proposed to be agreed to be adjusted and then published if it deviates from the default timings or "emergency" IRPs are to be processed out of the normal batch.



Question 4			
Respondent	Category	Response	Rationale
			Similarly, with differing lead times for the different Category IRPs looks sensible in that it allows Category 2 and 3 IRPs to progress more quickly but could risk there being multiple releases during the year that becomes a source of confusion about when they are to be implemented by. However, this seems to be more controlled than the current situation so is tentatively welcomed.
<b>Landis+Gyr</b>	Other SEC Party	Yes	We believe this strikes a balance between updating the documentation and maintaining a reasonable balance of change as issues and changes emerge. It allows parties to track the specification uplifts in an efficient manner.
<b>E.ON</b>	Large Supplier	Yes	For the volume of work, one uplift per year would be reasonable. We would like to ask whether SECAS considered a 6-monthly release for Cat 3 IRPs and the reasoning for not suggesting this.
<b>SSEN</b>	Network Party	Yes	Targeting one a year will allow for a clear trackable uplift. SSEN are interested to understand if this is not a steadfast rule, how this process will be managed if further uplifts are required.
<b>Western Power Distribution</b>	Network Party	Yes	We believe that one uplift of the Technical Specifications each year is a sensible approach and will allow Users to better plan and implement system uplifts to align accordingly.
<b>EUA</b>	Trade Association	Partly	The outlined approach with the appropriate consultation periods will be a workable solution.
<b>DCC</b>	DCC	Yes	It is clear from experience that uplifts are required from time to time. Targeting an annual approach will help to provide improved clarity and structure to this process. We note, and support, the point that further uplifts may be required in particular circumstances.

## Question 5: Please provide any further comments you may have

Question 5			
Respondent	Category	Response	Comments
Scottish Power	Large Supplier	N/A	-
Centrica (British Gas)	Large Supplier	N/A	-
Energy UK	Trade Association	N/A	-
Utilita	Large Supplier	N/A	-
OVO	Large Supplier	N/A	-
EDF	Large Supplier	No further comments	-
Landis+Gyr	Other SEC Party	See comments	Overall this proposal is solely DCC focussed and an appropriate process needs to be developed that works for manufacturers. Part of the solution is the early socialisation of IRPs and feedback process as highlighted above, but in addition numerous examples of IRPs have been categorised as having no impact on manufacturers which has proven to be invalid placing importance on active IRP reviews.
E.ON	Large Supplier	See comments	We believe there should have been a question whether industry parties agree with the rationale for categorisation of IRPs. We would like to ask whether SECAS have considered other models for categorisation of the IRPs to take into account the effort involved for all industry parties.
SSEN	Network Party		

Question 5			
Respondent	Category	Response	Comments
Western Power Distribution	Network Party		-
EUA	Trade Association		-
DCC	DCC	See comments	DCC welcomes this proposed transfer of another process from the transitional governance arrangements into the enduring governance structure.