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MP149 ‘Effecting Changes to the Smart Energy Code efficiently’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP149 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	Yes, although we believe this solution would work best with a SEC Manager model like that of a REC Code Manager role to manage these draft proposals efficiently.	<p>We welcome more groups being able to raise a draft proposal through the SEC modification process, but this may also result in an increase in modifications raised at a certain period. For example, in less than a week (17th - 22nd June 2021) we have seen 6 modifications be raised and, in some modifications, the full proposal draft has not been clear or accurate, therefore has needed further review. This is only likely to get more challenging for Industry and SEC administrators to facilitate once this modification is approved.</p> <p>To manage these potential increased pressures in efficiently managing extra draft proposals, we believe it worth reviewing and comparing this process against the REC's approach of handling the modification process. The REC assigns REC Code Managers to work more closely with the modification proposer to develop a solution to the changes and prioritise all modifications appropriately. Ensuring a modification is in the best, full state it can be before being raised, helps ensure that once it is out for consultation, the feedback is about content and much of the thinking of, e.g. interactions with other modifications and drafting, has already been completed.</p>	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			While it is helpful to allow more parties to raise SEC modifications, we need to make sure this is not slowing down the SEC Modification Process even further and that we are continuously moving in a direction that is most efficient for change to happen.	
Western Power Distribution	Electricity Network Party	Yes	<p>We agree that this modification addresses a valid issue that has been raised, however we question the governance around modifications being raised by certain Sub-Committees for example Change Board who would then be voting on their own proposal.</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>	
British Gas	Large Supplier	Yes	We strongly agree with the solution and support the modification to reduce time and effort taken to implement change. The need to sponsor proposals can be labour intensive and can impact other priority areas.	
OVO	Large Supplier	Yes	As a regular 'volunteer' that raises, and then has to own and justify, said Mods, we fully support and endorse the solution. It is a flawed process to expect a singular	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			individual, acting on behalf of their SEC Party, to take on the mantle required of them as the SEC sub committee is unable to do so.	
Electricity North West Limited	Electricity Network Party	No	<p>We agree in principle that:</p> <ol style="list-style-type: none"> 1) SECAS should have the ability to raise its own modifications (to replace finding a Sponsor) subject to this being set against a predefined set of criteria 2) Other specified SEC sub committees as named in this proposal such as the as the Alt Han Forum should have the ability to raise their own modifications (as per the SEC Security Committee and Smart Metering Key Infrastructure Policy Management Authority) subject to this being in accordance with predefined sections of the SEC. <p>We can not see sufficient evidence for and consequently do not agree with the proposal as it is currently stands and the draft legal text for the:</p> <ol style="list-style-type: none"> 1) the extension of the SEC Panel powers to raise modifications in any circumstances; 2) for the SEC Panel to be delegated with responsibility to determine if other SEC Sub-Committees should be able to raise modifications. 	

Question 2: Will there be any impact on your organisation to implement MP149?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	Yes	As highlighted in Q1, this mod could slow down the SEC Modification process even further.	
Western Power Distribution	Electricity Network Party	Yes	We understand there will be no direct impact to us, however as a Party that has previously volunteered to raise a SEC Modification on behalf of a Sub-Committee we would benefit from not having to do so in the future.	
British Gas	Large Supplier	No	No negative impact, only positive by means of not needing to volunteer for future proposals raised by SEC Panel allowing resource to be allocated to priority areas and positive delivery.	
OVO	Large Supplier	Yes	The impacts are all positive and will allow the correct parties to manage the Mods and not rely on favours and volunteers doing so.	
Electricity North West Limited	Electricity Network Party	Yes	We would be indirectly impacted by any modifications that are raised under the extension of these provisions.	

Question 3: Will your organisation incur any costs in implementing MP149?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	-	
Western Power Distribution	Electricity Network Party	No	-	
British Gas	Large Supplier	No	-	
OVO	Large Supplier	No	N/A	
Electricity North West Limited	Electricity Network Party	Yes	We could be indirectly impacted for modifications that would in future be raised by under the extension of these provisions. We are unable to provide costs for modifications that have not yet been raised or determined to impact Electricity Network Parties.	

Question 4: Do you believe that MP149 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	Yes	MP149 better facilitates SEC Objective B as it benefits the overall implementation of SEC Codes, by allowing the SEC Modification Process to be open to more SMART related groups to raise SEC changes. However, there is a risk that this modification can have equally negative impacts if it slows down the SEC Modification Process. Therefore, how it is implemented/the implementation method of this modification is very important to ensure the benefit is realised.	
Western Power Distribution	Electricity Network Party	Yes	We believe that this modification better facilitates the General SEC Objective (a)	
British Gas	Large Supplier	Yes	We believe this will better support timeframes for delivery of change to the general SEC objectives and allow members more time to focus on other proposals and give necessary time and effort in their feedback.	
OVO	Large Supplier	Yes	Yes, we do not believe the General SEC Objectives ever intended any individual SEC Party would have to justify and progress changes on behalf of others because there is no process in place for them to do so.	
Electricity North West Limited	Electricity Network Party	No	Subject to refinement or provision of sufficient evidence for all the proposed changes – see our response to Q1	

Question 5: Noting the costs and benefits of this modification, do you believe MP149 should be approved?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	Yes	However, there is still a step needed to ensure that the SEC Modification Process is not negatively impacted: as above, we recommend looking at the REC for inspiration for how to implement in a way that ensures the Modification Process is not slowed down as a result.	
Western Power Distribution	Electricity Network Party	No	<p>We support the modification however we question the governance around modification being raised by certain Sub-Committees for example Change Board who would then be voting on their own proposal.</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>	
British Gas	Large Supplier	Yes	We strongly recommend this is approved. Benefits to the current volunteers allows time and effort in areas of need and focus within the business. In our view also, the expert	

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			should be the proposer to allow the proposal to have the full attention required.	
OVO	Large Supplier	Yes	N/A	
Electricity North West Limited	Electricity Network Party	No	Subject to refinement or provision of sufficient evidence for all the proposed changes – see our response to Q1	

Question 6: How long from the point of approval would your organisation need to implement MP149?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	N/A	-	
Western Power Distribution	Electricity Network Party	N/A	We do not have any additional changes to make and therefore do not require any lead time.	
British Gas	Large Supplier	Sep 2021	It is our view that this proposal could and should be implemented immediately post decision	
OVO	Large Supplier	Immediately	No work is required of SEC Parties if this is approved. If it is not, then this would impact all.	
Electricity North West Limited	Electricity Network Party	N/A	N/A	

Question 7: Do you agree with the proposed implementation approach?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	-	This should be a part of wider discussion on the SEC Modification Process and code management rather than just a standalone modification. As above, we recommend looking at the REC for inspiration for how to implement in a way that ensures the Modification Process is not slowed down as a result.	
Western Power Distribution	Electricity Network Party	Yes	-	
British Gas	Large Supplier	Yes	We agree with the implementation approach set out.	
OVO	Large Supplier	Yes	Completely support	
Electricity North West Limited	Electricity Network Party	Yes	Subject to the proposed refinement or provision of sufficient evidence for all the proposed changes – see our response to Q1	

Question 8: Do you agree that the legal text will deliver MP149?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	Yes	While the legal text explicitly delivers this one modification, there is still a step needed to ensure that the SEC Modification Process is not negatively impacted: as above, we recommend looking at the REC for inspiration for how to implement in a way that ensures the Modification Process is not slowed down as a result.	
Western Power Distribution	Electricity Network Party	Yes	<p>We agree that the legal text meets the proposed solution however as mentioned previously we question the governance around modification being raised by certain Sub-Committees for example Change Board who would then be voting on their own proposal.</p> <p>If this modification is approved, we believe 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? Is included in the legal text.</p>	
British Gas	Large Supplier	Yes	The legal text is clearly defined	
OVO	Large Supplier	Yes	N/A	
Electricity North West Limited	Electricity Network Party	No	See our response to Q1 as there is insufficient evidence for all the proposals	

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP149 is implemented?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	But there may be a risk to consumers if the SEC Modification Process is slowed down as a consequence of this modification, which is why it is important to consider the wider impacts of the implementation of this modification and ensure it does not have unintended consequences.	
Western Power Distribution	Electricity Network Party	No	We do not feel that there is any direct impact to the consumer.	
British Gas	Large Supplier	No	No negative impacts to consumers, positive only by means of better support timeframes for delivery of change and allow more focus and time to delivery other areas of need.	
OVO	Large Supplier	No	This being implemented should not impact consumers in any way.	
Electricity North West Limited	Electricity Network Party	Yes	Subject to refinement or provision of sufficient evidence for all the proposed changes – see our response to Q1	

Question 10: Do you agree that the current governance process offers sufficient protection against misuse should MP149 be approved?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	-	Without context, it is hard to provide an answer to this question, e.g. what misuse is being suggested? Perhaps this question could be discussed as part of the Working Group or an ad-hoc discussion where context and background could be provided.	
Western Power Distribution	Electricity Network Party	No	As per previous comments we have concerns around committees raising and potentially voting on their own proposal. We have also raised a question about how it is agreed that a proposal should be raised by a Sub-Committee i.e. by vote and have challenged whether there should be some governance/approval process for SECAS to raise modifications. This would help ensure that large volumes of modifications don't get raised unnecessarily.	
British Gas	Large Supplier	Yes	The current governance process ensures all changes are sufficiently reviewed and protected. We do not believe there is any requirements or need to add in further complexities to this process as that could then make changes less efficient.	
OVO	Large Supplier	Yes	We do agree.	

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Electricity Network Party	No	See our response to Q1 as there is insufficient evidence for all the proposals	

Question 11: Do you agree that the SEC Sub-Committees should be included within the proposal of MP149?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	No	There does not appear to be a reason/rationale for including other SEC Sub-Committees. Unless there is a need, then it seems that including other Sub-Committees could unnecessarily slow the progression of the modification. Some Sub-Committees are already actively involved in the SEC Modification process, for example, TABASC. If there is a need to involve other stakeholders, as a principle, we should be focusing on groups that have less of a voice in the SEC Modification Process and have no means to feed into these modifications or draft proposals.	
Western Power Distribution	Electricity Network Party	Yes	Please refer to previous comments. We also believe that they should be restricted to only raising modifications within their area of expertise.	
British Gas	Large Supplier	Yes	Allowing SEC sub committees to raise proposals would make the process more efficient and ensure the modification could progress with the correct level of expertise and drive behind the proposal. At present a volunteer may not have the relevant experience to a particular issue which could limit progression or change.	

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
OVO	Large Supplier	Yes	Very much so.	
Electricity North West Limited	Electricity Network Party	No	See our response to Q1 as there is insufficient evidence for all the proposals	

Question 12: Noting the costs and benefits of this modification, do you believe MP149 should be approved?

Question 12				
Respondent	Category	Response	Rationale	SECAS Response
Utilita Energy Ltd	Large Supplier	See Question 5	-	
Western Power Distribution	Electricity Network Party	No	<p>We support the modification however we question the governance around modification being raised by certain Sub-Committees for example Change Board who would then be voting on their own proposal.</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>	
British Gas	Large Supplier	Yes	-	
OVO	Large Supplier	Yes	We do.	
Electricity North West Limited	Electricity Network Party	No	We agree in principle with the main driver of this proposal, but it requires further refinement or sufficient evidence to be provided to justify all the proposed modifications - See our response to Q1	

Question 13: Please provide any further comments you may have.

Question 13			
Respondent	Category	Comments	SECAS Response
Utilita Energy Ltd	Large Supplier	-	
Western Power Distribution	Electricity Network Party	-	
British Gas	Large Supplier	-	
OVO	Large Supplier	Not at this time.	
Electricity North West Limited	Electricity Network Party	<p>The remit of the Cross Code Steering Group terms of reference or working practices are still under development. We recommend the Working Group also consider this before providing sufficient evidence for extending the powers of SEC Panel so that they are able to raise modifications under any circumstances.</p> <p>Ofgem said that at the RDUG Meeting of 25 March 2021 various stakeholders had raised concerns about panels being able to overrule other panels' recommendations. Ofgem had decided to adjust its policy position as a result. Ofgem considered that the Cross Code Steering Group should have oversight to designate lead Codes in these situation; any guidance or principles for choosing the lead code should be set out in the CCSG's terms of reference or working practices.</p>	