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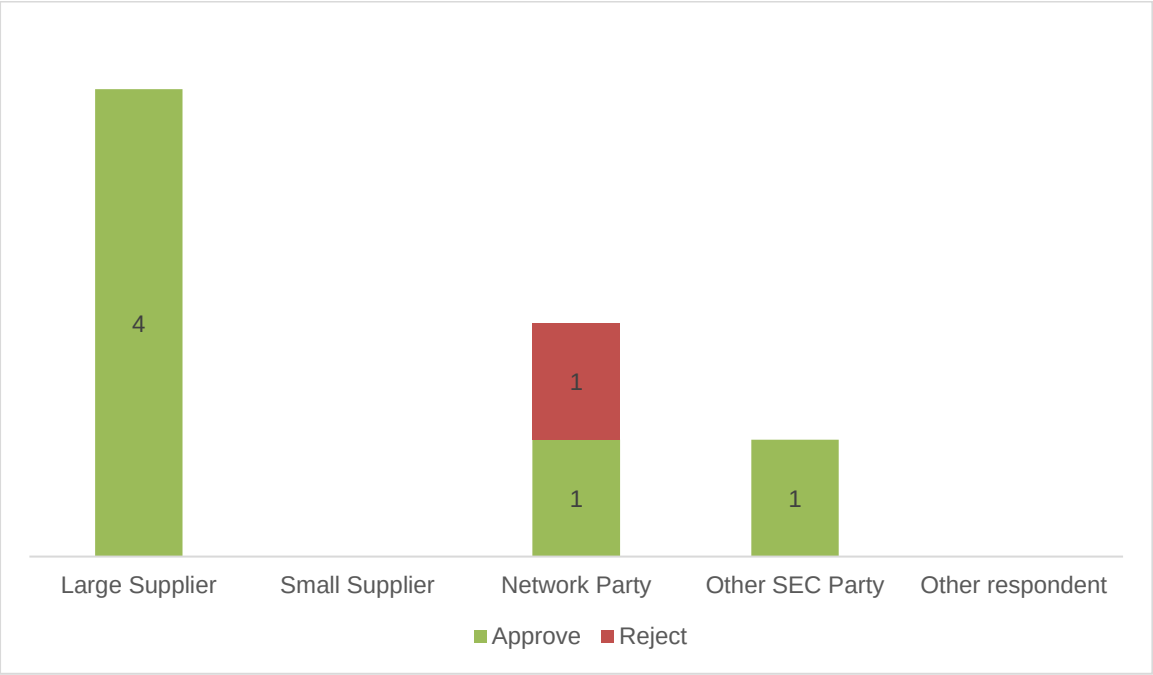
MP149 'Effecting Changes to the Smart Energy Code efficiently'

Modification Report Consultation responses

About this document

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

Summary of responses



Question 1: Do you believe that MP149 should be approved?

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
Western Power Distribution	Network Party	Approve	We believe that this modification better facilitates SEC Objectives (a) to facilitate the efficient provision, installation, and operation, as well as interoperability, of smart metering systems at Energy Consumers' premises within Great Britain.	-
Citizens Advice	Other SEC Party	Approve	We think this modification will better facilitate SEC objective G to facilitate the efficient and transparent administration and implementation of the code. Enabling SEC Panel, Sub-Committees and SECAS the opportunity to bring forward code modifications will support the governance process as these groups may be best placed to realise and respond to issues with code. Without this modification the process for raising modifications will continue to fall to parties who may not be best placed to bring them forward due to a lack of resource or interest. There appears to be a clear trend in SEC Panel SECAS and Sub-Committees having to seek proposers to bring forward modifications that benefit the operation of the code (20 cases). This is inefficient and presents a risk to the delivery of the code objectives. Given the protections in place that are outlined in the modification report, notably the review by the CSC, we	-

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			think SECAS are well based to bring forward modifications more efficiently.	
Electricity North West Limited	Network Party	Reject	We agree in principle that: 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. We welcome and acknowledge that the legal text has been updated to exclude the Change Sub-Committee. and the Change Board. We do not agree with the draft legal text for the extension of the SEC Panel powers to raise modifications in <u>any</u> circumstances. We would like to see areas where SECAS can raise modifications itself (e.g. where SECAS is fully accountable) and the circumstances (e.g. no party feels strongly enough to raise a housekeeping change) outlined.	SECAS will be able to provide guidance that highlights the intended areas of the SEC in which we would expect to raise modifications, and the expected circumstances. This guidance could also be used to highlight the areas of the SEC in which the SEC Panel remains responsible and have not delegated to Sub-Committees. However, this should not preclude either SECAS or the Panel from raising other modifications should an unforeseen circumstance later arise.

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			The SECAS response in the modification report that "*The SEC Panel is responsible for certain areas of the SEC such as Credit Rules, or Governance. Therefore they would be the appropriate committee to raise Modifications in those areas*." does not provide sufficient evidence. The only other area in the modification report which could provide rationale states that the current restrictions on the SEC Panel has lead to 6 modifications being raised by volunteer proposals (of which only 3 have been implemented, one rejected and 2 are still in development).	
British Gas	Large Supplier	Approve	We believe this should be approved as it better facilitates SEC objective g	-
Utilita Energy Limited	Large Supplier	Approve	SEC objective G – this change will result in modifications being overseen with the raising body as opposed to a sponsor and should consequently aid the development and potential implementation of modifications, leading to efficiencies of this Code.	-
EDF	Large Supplier	Approve	We agree that it would be appropriate to allow Sub committees to raise modifications to avoid individuals being asked to raise, sponsor, support and champion a change that they have little interest in. The solution for this modification will better facilitate SEC Objectives (g) as the improvement will reduce the modification duration and will accurately reflect the Proposer, rather than a SEC	-

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
			Party's name who may not have interest in the modification.	
OVO	Large Supplier	Approve	As a Supplier that has raised numerous Modifications on behalf of both Industry bodies and for BEIS, We fully support and welcome the progression of this Mod to address that. This aligns fully to SEC Objective (g) as set out in the Mod Report.	-

Question 2: Please provide any further comments you may have

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
Western Power Distribution	Network Party	We wonder if there should be additional detail around when/what modifications the Code Administrator (SECAS) can raise.	SECAS will be able to provide some guidance that highlights the intended areas of the SEC in which we would expect to raise modifications, and the expected circumstances. However, this should not preclude us from raising other modifications should an unforeseen circumstance later arise.
Citizens Advice	Other SEC Party	-	-
Electricity North West Limited	Network Party	Yes. The Authority rejected MP088 Power to raise modifications (and early version of MP149) due to lack of evidence of inefficiencies with the process when modifications had volunteer Proposers. We believe that there still remains a lack of evidence for existing the SEC Panels power to raise a modification in any circumstances. Instead, we would support a modified MP149 that only extended the SEC panels against defined circumstances such as Credit Rules.	SECAS will be able to provide guidance that highlights the intended areas of the SEC in which we would expect to raise modifications, and the expected circumstances. This guidance could also be used to highlight the areas of the SEC in which the SEC Panel remains responsible and have not delegated to Sub-Committees. However, this should not preclude either SECAS or the Panel from raising other

Question 2			
Respondent	**Category**	**Comments**	**SECAS Response**
			modifications should an unforeseen circumstance later arise.
British Gas	Large Supplier	-	-
Utilita Energy Limited	Large Supplier	N/A	-
EDF	Large Supplier	-	-
OVO	Large Supplier	Hopefully this will smooth out the process and lead to a more effective management of Modifications as set out in the Report.	-