SEC
Smart Energy Code

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Smart Energy Code

MP149

‘Effecting Changes to the Smart Energy Code efficiently’

Modification Report

Version 1.0

31 August 2021

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

This document is a Modification Report. It 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 two annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the proposed solution.
- **Annex B** contains the full responses received to the Refinement Consultation.

Contact

If you have any questions on this modification, please contact:

Kev Duddy

020 3574 8863

kev.duddy@gemserv.com

1. Summary

This proposal has been raised by Sarah-Jane Russell from Centrica.

This Modification Proposal seeks to resolve an inefficiency within the Modifications Process whereby SEC issues identified by the Department for Business, Energy and Industrial Strategy (BEIS) or the SEC Panel and its Sub-Committees can only be progressed if an industry Proposer (SEC Party) is identified and prepared to sponsor the initiative.

This increases the burden on already busy SEC Parties, can detrimentally impact the progression of the modification (if the Proposer has limited time, knowledge, or interest in the topic), and increases the cost and lead time to progress and implement modifications.

This modification therefore seeks to give the SEC Panel, its Sub-Committees and the Smart Energy Code Administrator and Secretariat (SECAS) the power to raise modifications, in order to better facilitate the efficient and transparent administration and implementation of this Code. It also complements a key area of Code governance reform being introduced under the Retail Energy Code (REC).

The need for this Modification Proposal is highlighted following handover of responsibilities from BEIS to SECAS in relation to Issue Resolution Proposals (IRPs). Historically, BEIS would identify issues with Technical Specifications, mark up SEC legal text changes to resolve these issues, and request that SECAS implement the changes through BEIS-led designations. BEIS has since transferred responsibility for delivering IRPs to SECAS to implement through the SEC Modification Process. This requires SECAS to seek a volunteer Proposer from the SEC Party community to sponsor and support the modification through the process, which is inefficient, and may not always be the most appropriate person.

During the development of this solution, it has become apparent that the power to raise modifications should not only be extended to SEC Panel and SECAS, but also to the remaining Sub-Committees and the Alternative Home Area Network (Alt HAN) Forum who currently do not have the power to raise modifications relating to their remits. The Proposed Solution will enable the SEC Panel and SECAS to raise proposals as well as the Technical Architecture and Business Architecture Sub-Committee (TABASC), the Operations Group (OPSG) and the Alt HAN Forum so long as any proposal relates to their remits. The modifications framework contains checks and balances to ensure that only truly value-adding modifications proceed beyond the Development Stage.

The costs for implementation of the modification are limited to SECAS time and effort to update the SEC. There are no system changes required, and no direct costs for SEC Parties. There is a lead time of 10 working days to prepare the relevant changes, therefore the November 2021 SEC Release is being targeted for this modification. This modification is an Authority Determined Modification.

2. Issue

What are the current arrangements?

What are Issue Resolution Proposals?

IRPs identify issues within the SEC Technical Specification documents and put forward a solution to the identified problem. They can affect the Great Britain Companion Specification (GBCS), the Smart Metering Equipment Technical Specifications (SMETS) or the Communications Hub Technical Specifications (CHTS). Once these issues have been identified and a solution has been agreed at the BEIS-led Technical Specification Issue Resolution Sub-group (TSIRS), these IRPs are passed to SECAS to incorporate into the SEC via the SEC modifications process. IRPs will still (for the time being) be discussed at the TSIRS, until this moves from being governed by BEIS to being overseen by the TABASC.

Who can raise SEC modifications?

SEC Section D 'Modification Process' sets out the journey of a SEC modification from raising a Draft Proposal through to implementation.

SEC Section D1.3 states which Parties can raise Draft Proposals, and these are:

- SEC Parties (including the Data Communications Company (DCC));
- Citizens Advice and Citizens Advice Scotland;
- Anyone specifically designated by the Authority;
- The Authority, but only following a Significant Code Review (SCR); and
- The Panel in specific circumstances (see below).

Two SEC Sub-Committees can also raise Draft Proposals:

- the Security Sub-Committee (SSC) under SEC Section G 'Security' Section G7.20 where a Draft Proposal relates to its remit or documents; and
- the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) under SEC Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' Section L1.19.

SEC Panel raising SEC modifications

The specific circumstances under which the Panel can raise a Draft Proposal are (this can be found under SEC Section D1.3(e)):

- following a review carried out by the Panel at the request of the Authority (Section C2.3(i)), to progress any consequential changes required;
- following a recommendation from SECAS that the SEC is inconsistent with the Code Administration Code of Practice (CACoP) (Section C7.2(c)), to resolve this inconsistency;
- to progress a Fast-Track Modification to resolve any non-material typographical errors or other minor factual inaccuracies or inconsistencies within the SEC; and

- to progress any consequential changes required to the SEC as a result of changes under other Codes.

Code governance

Code governance is currently undergoing a review across the industry, and this includes reviewing the approach to change. This can be found in the latest emerging industry Code, the REC. The REC, whilst still in draft form, allows for 'any interested person' to submit a Change Proposal, regardless of whether or not they are a Party to the REC (this can be found under REC Section 7 'Submitting Change Proposals').

One of the reasons this approach was taken forward is that the REC is a Code focusing on Consumer outcomes and promoting innovation. It was felt that it wouldn't be appropriate to allow a scenario where REC Parties (or even the Code Manager) can stifle innovation if another organisation (or individual) has a good idea that should be explored. The Code Manager has been appointed by the Authority to prevent this process from being abused and given it the provision to reject any Change Proposals that may be vexatious and have no real chance of success.

The Code Manager service was procured with the specific intention of it operating in a more empowered, independent way, taking on many of the responsibilities currently managed by Panels and Executive Committees.

There is also precedence for Code Administrators to be able to raise changes, for example National Grid can raise Connection and Use of System Code (CUSC) modifications as the System Operator, even though it is also the Code Administrator. In addition, the DCC, whose functions are also subject to SEC governance, can also raise SEC Draft Proposals.

What is the issue?

SEC Party resources

Under the current arrangements SECAS is forced to rely on the goodwill and resource of SEC Parties in order to carry out the responsibilities transferred to it by BEIS to process IRPs, or to progress changes identified by SECAS and the SEC Panel Sub-Committees.

Resource constraints of SEC Parties has always been a consideration for potential volunteer Proposers, and this has been exacerbated by the pandemic. Many businesses have been forced to reduce the size of their regulatory departments to make savings and are focussing their employees to work on the issues directly affecting their organisation. Relying on goodwill to carry out necessary modifications is seen as an increasing risk, as individuals and SEC Parties are becoming less willing to carry this burden. In addition, as BEIS hands over more transitional governance activities to SECAS, it is anticipated that more responsibility for change will be handed over to SECAS to enact through the Modification Process.

Misallocation of responsibility

When a volunteer Proposer agrees to take on the burden of being part of the change process they are often not closely engaged with the process, the issue, or the modification, and only volunteered out of goodwill. It is not appropriate for an individual to be asked to sign their name on behalf of a SEC Party that has not been involved, nor potentially had any interest or understanding, with a modification that they have been asked to sponsor.

This can lead to a lack of active and efficient engagement with the modification which creates inefficiencies, given the need for SECAS to seek a Proposer's approval at various stages. This requires SECAS to carry out work and development of the modification, prepare recommended options and ways forward, educate the Proposer on technical issues and seek their approval of the Proposed Solution before the change can be considered further, adding an additional step into the process[1].

SECAS and Sub-Committees

SECAS and the Sub-Committees are often better placed to identify and consider potential changes that would be of benefit for the Consumer and the industry. The SMKI PMA and the SSC already have the ability to raise changes when within the remit of that Sub-Committee, whereas the remaining Sub-Committees and the Alt HAN Forum do not, and so must rely on SEC Parties' goodwill and resource in order to enact positive change.

How many modifications has this issue affected?

The current restrictions have led to more than 20 SEC Panel, OPSG or SECAS-initiated modifications being raised by volunteer Proposers. Since 2018 these proposals account for around 17% of all SEC modifications raised.

What is the impact this is having?

Increased risk of changes not being raised

SECAS and the Sub-Committees are well placed to identify and consider potential changes that would be of benefit for the Consumer and the industry. It is an increasing risk that SEC Parties will not be able to devote resource to act as a Proposer on modifications that do not directly affect their organisation. If a volunteer cannot be found due to resource constraints, or if the proposal does not provide that SEC Party with a benefit, then a change that could have a consumer benefit may not be raised, to the detriment of the consumer, unless Citizens Advice is able to provide a resource to raise the proposal.

Creating inefficiencies in the Modification Process

Where a volunteer Proposer is needed, SECAS must devote time and effort to finding a volunteer and then consulting with them at various stages of the Modification Process. As progressing modifications are not the volunteer's main job, these consultations often cause delays as they need to fit in with the Proposer's other responsibilities that take priority. This can be exacerbated when a volunteer Proposer needs more time to understand and consult internally as they're not engaged with the modification, or when their organisation is not engaged with the change, and they require internal approval in order to progress the modification.

[1] CACoP Principle 6 'A proposer of a Modification will retain ownership of the detail of their solution' – please see the CACoP for more information.

Large SEC Party bias

The change process is often accused of being monopolised by the larger Parties, and there are some suggestions that Large Suppliers drive industry change for their own benefit. However, this is more likely because Large Suppliers are more likely to have the resources to take responsibility for changes; this perception is then magnified by them acting as volunteer Proposers in these instances.

There is an element of bias that naturally occurs when considering the impacts from a specific organisation's point of view. This could prevent that change from being raised if that change is of no benefit to that Party. It could also lead to the development of that modification with an increased risk of bias being driven by a Party's agenda that would otherwise not have been there.

Impact on consumers

SEC modifications need to be shown to better facilitate the SEC Objectives to ultimately provide a better service to consumers. It is therefore vital that the consumer is at the forefront when discussing the impact of change.

However, a SEC modification that benefits consumers may also result in SEC Parties incurring costs. This could potentially deter Parties from putting themselves forward as Proposers and result in the Consumer Representative, Citizens Advice, volunteering, who may not have adequate resource to actively engage.

Due to the previously stated inefficiencies, these delays automatically cause an increase in costs. If the duration of a modification was shorter, it would likely to lead to cost savings for SEC Parties and therefore consumers.

3. Solution

Proposed Solution

MP149 proposes to extend the provisions to raise Draft Proposals to SECAS, the TABASC, the OPSG and the Alt HAN Forum. It will also remove the existing limitations placed on the SEC Panel. Additionally, MP149 will also extend this ability to certain other SEC Sub-Committees subject to the SEC Panel delegating them that responsibility within their terms of reference.

Legal text

The changes to the SEC required to deliver this proposed solution 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

SEC Parties are not directly impacted by this modification. However, they are likely to be indirectly impacted by modifications that are raised under the extension of these provisions.

DCC System

There is no impact identified on the DCC systems.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section D 'Modifications'

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

Technical specification versions

There are no identified impacts on technical specifications.

Consumers

There are no identified direct impacts on consumers.

Other industry Codes

There are no identified impacts on other industry Codes.

Greenhouse gas emissions

There are no identified impacts on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs to implement this modification.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

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

SEC Party costs

SEC Parties have indicated via the Refinement Consultation (see Annex B) that they will not incur direct costs from this modification. One Party did note that there could be indirect costs as a result of modifications raised under these provisions in the future. However, SEC Parties will continue to input to and vote on all proposed changes, as currently, thereby ensuring only needed changes progress.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received on or before 21 October 2021; or
- **24 February 2022** (February 2022 SEC Release) if a decision to approve is received after 21 October 2021 but on or before 10 February 2022.

As this is a document only change, and there are no impacts to other SEC Parties there is a lead time of 10 working days to prepare the relevant changes within the SEC Release. The November 2021 SEC Release is the next SEC Release that this change can be targeted for.

7. Assessment of the Proposal

Observations on the issue

SECAS presented the Draft Proposal to the Change Sub-Committee (CSC) for initial comment. Members were supportive of the proposal's intent. Members felt that the issue was clearly defined and supported the rationale. Several CSC members have experienced first-hand becoming volunteer Proposers.

Members identified a key benefit which was the potential alignment to the newest industry Code, the REC. During the Development Stage, SECAS engaged with the REC Code Manager to further understand the rationale behind allowing 'any interested person' to submit a Change Proposal. The outcomes of this can be found in Section 2 above. Ofgem has also commented that while it encourages other Codes to learn from the changes being introduced under the REC, they should not just copy these over like-for-like but should first ensure any changes are suitable for that Code.

The proposal was presented to all other SEC Sub-Committees, who were happy for it to proceed and added no further comments.

The CSC recommended that the Panel converted the Draft Proposal into a Modification Proposal and progressed it to the Refinement Process.

Solution development

The original solution to this issue was raised under MP088 'Power to raise modifications'. The solution was discussed at the Working Group, along with each of the SEC Sub-Committees and received widespread support. MP088 was recommended for approval by the Change Board but was ultimately rejected by the Authority. The Authority's decision letter highlighted key points that it felt needed further justification in order to approve the proposal.

SECAS, the Proposer and the Working Group have considered these points and have sought to address these below.

Do current governance arrangements block efficient progression of modifications, or prevent them being raised?

Ofgem questioned whether there was sufficient evidence to support this modification. It noted in the MP088 decision letter that there was no evidence that modifications were not being raised, nor that there were inefficiencies within the process when modifications had volunteer Proposers.

Each modification is very different so making direct comparisons between them can be misleading. There have been more than 20 modifications raised that relied on a volunteer Proposer. Working Group members highlighted particular modifications they had volunteered for that had resulted in an inefficient change process. MP095 'Alignment of SEC Credit Cover' (arising from a Panel recommendation) and MP122 'Operational Metrics' (arising from an OPSG recommendation) were both highlighted as good examples of this. MP095 has been placed on hold as the Proposer does not have the resource to drive forward a solution that works for the rest of industry. MP122 resulted in a split to two proposals (MP122A and MP122B) and has required a far greater level of input and resource from the volunteer that had been envisaged. Therefore, the Proposer is not able to devote as much time as required in order to efficiently progress the modification. Both of these proposals are still ongoing after well over a year and are still in the Refinement Process. This contrasts with the average duration of 140 working days between a Draft Proposal being raised to the time a decision is made on a modification (since 2018). These figures also do not consider the additional time and effort required to find a volunteer Proposer in advance of a Draft Proposal being raised, and the time taken to keep them engaged and up to date throughout the process.

Requests for volunteer Proposers is being met with increasing resistance as resources become more stretched for SEC Parties. Large Suppliers are often relied upon to act as a volunteer Proposer as other Parties often are not able to commit the resource required of them. However, the Large Suppliers who have traditionally acted as volunteer Proposers in the past have indicated that this is

becoming more of an issue for them as well. At the Working Group meeting in June 2021, multiple SEC Parties who had acted as volunteer Proposers in the past voiced their opinions. The themes were that the resource required to support a modification is a burden, and also that the volunteer is often left to make decisions without necessarily having the technical knowledge required in order to make that decision. It was clear that there was no appetite to continue to act as volunteers if it could be helped. This supports the belief that the solution is needed to futureproof the Modification Process.

How and when would SECAS and the Sub-Committees raise modifications?

The SMKI PMA and the SSC have raised 18 Draft Proposals since 2016. Of these modifications that have reached a decision, each of them has been approved and implemented. This acts as an indicator for the quantity and demonstrates the quality of change that would likely be raised by a Sub-Committee.

The Working Group was asked to confirm which Sub-Committees it believed should be granted this power, and whether that should be unrestricted. The group agreed that Sub-Committees should only be allowed to raise modifications in areas that fall under the remit of that Sub-Committee. Therefore, each Sub-Committee would only be able to raise modifications that directly relate to its Terms of Reference. The Working Group agreed that the TABASC, the OPSG, the Alt HAN Forum and the SEC Panel should be able to raise Proposals.

One respondent to the Refinement Consultation questioned how the affected Sub-Committees, the SEC Panel and Alt HAN Forum would reach decisions on whether to raise modifications. It was confirmed that these decisions would be made in accordance with all decisions within those forums, as stated in the Terms of Reference for each forum. This is currently by majority verdict. This mirrors the way that the SSC and SMKI PMA currently make their decisions to raise modifications.

The Working Group also felt that placing restrictions on the modification types that SECAS could raise would be too limiting in terms of its ability to raise positive changes. SECAS should be able to raise changes that it identifies could benefit the industry or consumers, as and when they are identified. Members also felt the modifications framework already contains sufficient check and balances to prevent unnecessary or vexatious proposals from proceeding beyond the Development Stage. They did not believe an additional check was needed before SECAS was able to formally raise a new Draft Proposal.

Are new/amended responsibilities or accountability mechanisms required?

In its decision on MP088 Ofgem noted that the Modification Report did not give enough consideration to any potential change in governance or accountability.

The Working Group discussed the governance arrangements in detail and determined that the existing arrangements offer sufficient protection against misuse. It also noted that all modifications should follow the same process and adding unnecessary complexity and inefficiency into the governance was not warranted. The CSC would report to the SEC Panel if it felt that modifications were being raised that were not needed.

The Working Group agreed that the current SEC modification framework gives sufficient oversight and separation to ensure that vexatious proposals do not continue through the process. Each proposal must be reviewed and approved independently by the CSC and the Change Board at various stage gates. In addition, all SEC Parties are given the opportunity to input into each proposal

via the Refinement Consultation, the Working Group and the Modification Report Consultation in advance of a decision.

One respondent to the Refinement Consultation questioned whether it was appropriate for SECAS to be able to raise modifications without having any validation or approval in advance. They also noted that SECAS could have a predefined set of criteria. However, this point was discussed at the Working Group and it was determined that this could be too prescriptive and subsequently prevent an appropriate change being raised.

Will additional workload lead to increase in SECAS costs?

Whilst MP088 did address the implementation costs for the modification, there was no analysis against the potential costs that may be incurred as a result of the change of the modification.

It is not expected that there will be an increase in costs associated with this proposal. Currently each proposal is assigned a Lead Analyst who is responsible for assisting the Proposer to drive forward the modification by preparing documentation and carrying out research on each proposal.

Many volunteer-led modifications are currently presented to the Working Group several times for discussion as a result of the Proposer not being fully engaged with the proposal or having the requisite knowledge of the issue. These delays often result in duplication of work. Therefore, whilst there is the potential for more modifications to be raised directly by SECAS, the overall time and cost associated with managing the modification will come down.

The Working Group questioned whether there would be an increase in costs. SECAS highlighted that the amount of work that goes into raising an initial Draft Proposal for CSC to review would be similar to the amount required to request permission to formally raise a Draft Proposal. It was also noted that this workload is prioritised by the CSC once a Draft Proposal is raised, and therefore only modifications that are deemed of sufficient value are worked on, once raised initially.

Future of Code Governance – Alignment with the REC

Ofgem has indicated, by way of the REC proposals, a shift from traditional Code Administration towards Code Management with enhanced responsibilities and accountability. SECAS is being continually challenged by stakeholders to operate as more of a Code Manager and it is important that innovation and continuous improvement is at the forefront of the SEC to ensure it continues to evolve to meet the demands of smart metering to the benefit of the consumer.

One respondent to the Refinement Consultation noted that the current arrangements should be compared with the REC to identify any further improvements that could be made to the SEC Modification Process.

The REC proposals include provisions that any person can propose a change to the Code, albeit with an appropriate framework to ensure that proposals only continue that would be of benefit. MP149 does not aim to widen the net that far under the SEC. However, by allowing SECAS and the Sub-Committees to raise proposals it promotes a similar level of innovation. To ensure frivolous modifications are not raised, any change must, as now, pass through the CSC in the first instance before resource is diverted to them. The CSC also carries out a similar role to that of the REC Code Manager with regards signing off the prioritisation of modifications that should be worked on. This means that CSC has the power to prevent any modification that the CSC do not believe has merit from being explored further and incurring cost.

Who should be given the power to raise modifications?

SECAS

SECAS currently manage the IRP process, having been handed this responsibility from BEIS. This has already resulted in SECMP0055, MP078, MP090, MP098, MP099, MP143 and MP158 being raised. Seeking a volunteer Proposer is inefficient for this enduring process. Additionally, SECAS would be well placed to raise other modifications that might result from projects that are requested by SEC Parties or the SEC Panel. For example, housekeeping modifications, making changes from certain SEC reviews, or facilitating changes such as leaving the European Union (EU). The list of previously initiated modifications below shows the variety of areas identified by SECAS.

Past modifications identified by SECAS	
Modifications with volunteer Proposers	**Status**
SECMP0049 'Section D Review: Amendments to the Modification Process'	Implemented
SEMP0050 'Section D Review: Moving the Working Group Terms of Reference to a separate document'	Implemented
SECMP0051 'Section D Review: Amendments to the Fast Track Modification process'	Implemented
SECMP0055 'Incorporation of multiple Issue Resolution Proposals into the SEC'	Implemented
SECMP0069 'EU Exit Changes'	Implemented
MP078 'Incorporation of multiple Issue Resolution Proposals into the SEC - Part 2'	Refinement Process
MP079 'Provisions for withdrawing modifications'	Rejected
MP088 'Power to raise modifications'	Rejected
MP098 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 3'	Implemented
MP099 'Incorporation of multiple Issue Resolution Proposals into the SEC - Batch 4'	Pending Implementation
DP132 'DLMS references in GBCS'	Withdrawn
MP143 'Incorporating IRPs into GBCS v3 series'	Refinement Process
MP149 'Effecting Changes to the Smart Energy Code efficiently'	Refinement Process

SEC Panel

The SEC Panel has been the instigator for a number of modifications in the past. There are areas within the SEC that do not fall under the Terms of Reference of another Sub-Committee and therefore the responsibility and expertise for these lies with the SEC Panel. An example of this is within the Credit Rules. The SEC Panel has previously been the instigator of multiple modifications in this area, the table below provides further information. The existing arrangements to find a volunteer Proposer each time to raise identified gaps within the SEC is inefficient.

Past modifications identified by the Panel	
Modifications with volunteer Proposers	**Status**
SECMP0047 'Default Provisions for Other SEC Parties'	Implemented
SECMP0061 'Enduring SEC Release Provisions'	Implemented
MP0076 'Pursuing Non-Payment in Events of Default'	Implemented
MP084 'Other User Panel Seating Amendment'	Rejected
MP095 'Alignment of SEC Credit Cover'	Refinement Process
MP159 'Credit Cover Review'	Refinement Process

Alt HAN Forum

As the Alt HAN Arrangements and the Alt HAN Company (AltHANCo) develop, there will be discrepancies that are identified between the SEC and how these real-world processes are working. It is envisaged that these situations will continue as the technology and solutions changes, which could require accompanying SEC changes to facilitate these.

Similarly, the Alt HAN Forum has required volunteer Proposers for modifications in the past. The table below shows these modifications that have been raised historically.

Past modifications identified by the Alt HAN Forum	
Modifications with volunteer Proposers	**Status**
SECMP0064 'Alt HAN Co permission to seek access for Alt HAN Activities as a representative of energy suppliers'	Implemented
SECMP0070 'Permission to give Alt HAN Forum vires for enduring management and maintenance of the Exempt Premises List (EPL)'	Implemented
MP082 '2.4GHz Channel Management'	Refinement Process
MP086 'Alt HAN Roll-Out Financing'	Implemented
MP114 'Alt HAN P2P Charging Data'	Implemented

TABASC

The TABASC regularly reviews issues and potential solutions that relate to the Smart Metering Architecture. Its membership naturally identify issues and raise good ideas for Architecture improvements as part of its remit. However, it is currently not able to raise these to positively impact the Smart Metering Implementation Programme (SMIP).

Moving forward, the plan is for the TSIRS to transition away from BEIS to fall under the Terms of Reference for the TABASC, adding further impetus for this proposal.

Operations Group

The OPSG is responsible for issues surrounding operational activities that are undertaken by SEC Parties in relation to Smart Metering. It has a unique insight into identification of process inefficiencies

and failures that would require changes to the SEC. Additionally, the OPSG would be able to raise requests for reporting that may be required to support the identification or operational issues and risks. The list below shows the modifications that have been initiated by the OPSG in the past.

Past modifications identified by the OPSG	
Modifications with volunteer Proposers	**Status**
MP122A 'Operational Metrics'	Implemented
MP122B 'Operational Metrics - Part 2'	Refinement Process

Futureproofing the modification

Some SEC Parties that responded to the Refinement Consultation, supported by previous Working Group discussions, had indicated that there was some concern over the approach to the legal text. This has been drafted to futureproof the requirement to allow the SEC Panel to delegate the provision to raise modifications to any new Sub-Committee in the future. SECAS highlighted that if another Sub-Committee was created, having to consult the industry on its ability to raise modifications would slow down any potential changes that could be raised for the benefit of consumers or SEC Parties.

Parties had highlighted that in the legal text drafting, the CSC and Change Board had not been specifically excluded. SECAS advised this would be amended in the final legal text.

The Working Group agreed that it was comfortable with this approach, subject to the changes detailed above.

Support for Change

Working Group

The Working Group agreed that this is an issue that is likely to become more of a problem as resource constraints continue to be a factor. Many previous volunteers provided their views on being a volunteer in the past and how the burden and the decision making was not appropriate. There was widespread support for other Sub-Committees to be able to raise modifications that sat within their remit. Members felt that a Sub-Committee would pass on the details of any issue they identified that did not sit within their remit to the appropriate group. This view was challenged in the Refinement Consultation and SECAS returned to the Working Group in August 2021 with additional rationale behind the proposal to extend the provision to each group. The Working Group members agreed that sufficient rationale had been provided against each group in the Modification Report and that the provision to raise modifications should be extended to those groups.

It was agreed that making the legal text too prescriptive could be a detriment should modifications arise that SECAS was then unable to raise that would generate positive change.

The Working Group agreed that the existing governance arrangements for all should be followed for any SECAS or Sub-Committee raised modifications. The existing arrangements provide sufficient oversight and opportunity for engagement; adding additional criteria would make the process unnecessarily cumbersome and complex.

Refinement Consultation

Five SEC Parties responded to the Refinement Consultation. Each of those noted that they supported the principle of the modification. However, some Parties provided feedback as to areas that the modification should be refined before it was progressed. These related to the specific Sub-Committees that should be able to raise modifications, as well as the SEC Panel having its current provisions de-restricted. The modification underwent further refinement at later Working Group sessions to address these issues which is described under the Solution Development section above.

The legal text was updated following these discussions and the consultation responses to remove the CSC and Change Board specifically from the legal text.

Views against the General SEC Objectives

Proposer's views

Objective (g)[2]

The Proposer believes that 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 Party's name who may not have interest in the modification.

Industry views

Four out of five respondents to the Refinement Consultation agreed that the modification better facilitates the SEC Objectives. The fifth respondent noted that they felt the modification needed further refinement before they could give support. The details are noted under the Solution Development section above.

Views against the consumer areas

Improved safety and reliability

If implemented, this modification will have a neutral impact against this consumer area.

Lower bills than would otherwise be the case

If implemented, this modification will have a neutral impact against this consumer area.

Reduced environmental damage

If implemented, this modification will have a neutral impact against this consumer area.

Improved quality of service

If implemented, this modification will have a neutral impact against this consumer area.

[2] To facilitate the efficient and transparent administration and implementation of this Code.

Benefits for society as a whole

If implemented, this modification will have a neutral impact against this consumer area.

Appendix 1: Progression timetable

The Modification Report will be presented to the CSC on 31 August 2021 and then issued for Modification Report Consultation. It will then be presented to the Change Board for recommendation on 29 September 2021. The Modification Report will then be issued to the Authority for decision.

Timetable	
Event/Action	**Date**
Draft Proposal raised	14 Jan 2021
Presented to CSC for initial comment	26 Jan 2021
Sub-Committee input sought	Jan – Feb 2021
Presented to CSC for final comment and recommendation	23 Feb 2021
Panel converts Draft Proposal to Modification Proposal	12 Mar 2021
Solution developed with Proposer	Apr – May 2021
Modification discussed with Working Group	2 Jun 2021
Refinement Consultation	11 Jun 2021 – 2 Jul 2021
Modification discussed with Working Group	7 Jul 2021
Modification discussed with Working Group	4 Aug 2021
Modification Report presented to CSC	31 Aug 2021
Modification Report Consultation	1 Sep 2021 – 20 Sep 2021
Change Board vote	29 Sep 2021
Authority decision (anticipated date)	Late Oct 2021

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**
BEIS	Business, Energy & Industry Strategy
CACoP	Code Administration Code of Practice
CUSC	Connection and Use of System Code
CSC	Change Sub-Committee
DCC	Data Communications Company
IRP	Issue Resolution Proposal
KPI	Key Performance Indicator
PMA	Policy Management Authority
REC	Retail Energy Code
SCR	Significant Code Review
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMIP	Smart Metering Implementation Programme
SMKI	Smart Metering Key Infrastructure
SSC	Security Sub-Committee
TSIRS	Technical Specification Issue Resolution Sub-Group

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MP149 'Effecting Changes to the Smart Energy Code efficiently'

Annex A

Legal text – version 1.0

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section D 'Modifications'

These changes have been redlined against Section D version 7.0 incorporating the changes for MP161 'Significant Code Review – Retail Code Consolidation' that will be implemented on 1 September 2021.

Amend Section D1.3 as follows:

D1.3 A Draft Proposal may be submitted by any of the following persons (the **Proposer**):

(a) a Party;

(b) Citizens Advice or Citizens Advice Scotland;

(c) any person or body that may from time to time be designated in writing by the Authority for the purpose of this Section D1.3;

(d) the Authority or the DCC acting at the direction of the Authority, but in each case only in respect of variations to this Code which are in respect of a Significant Code Review; ~~and~~

(e) the Panel ~~(where all Panel Members at the relevant meeting vote unanimously in favour of doing so), but only in respect of variations to this Code which are intended to give effect to~~, and the following Sub-Committees:

(i) the Security Sub-Committee in accordance with Section G7.23 (Modifications);

(ii) the SMKI PMA in accordance with Section L1.19 (Modification of the SMKI SEC Documents and S1SPKM SEC Documents by the SMKI PMA); and

(iii) each and every other Sub-Committee (excluding the Change Sub-Committee and the Change Board) to which the Panel expressly delegates the power to raise a Draft Proposal (but only in respect of matters within the scope of the Sub-Committee's remit); and

~~( ) recommendations contained in a report published by the Panel pursuant to Section C2.3(i) (Panel Duties);~~

~~( ) recommendations contained in a report published by the Code Administrator pursuant to Section C7.2(c) (Code Administrator);~~

~~( ) Fast-Track Modifications (as described in Section D2.8 (Fast-Track Modifications)); and/or~~

~~( ) consequential changes to this Code required as a result of changes proposed or already made to one or more other Energy Codes.~~

~~(j)~~(f) the REC Code Manager and/or the Code Administrator where a Consequential Change to this Code has been identified~~.~~;

~~(k)~~(g) the Alt HAN Forum in respect of Section Z (Alt HAN Arrangements); and

~~(l)~~(h) the Code Administrator.

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MP149 'Effecting Changes to the Smart Energy Code efficiently'

Annex B

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.	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. 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.	SECAS raise initial proposals on behalf of the Proposer as Draft Proposals before presenting them to Change Sub-Committee (CSC). This gives CSC the opportunity to feedback on them and provide feedback as to whether an issue is sufficiently developed to move to the next stage and being raised as a modification proposal. This check ensures that only fully defined issues are progressed. Working on solutions before engaging with industry can lead to an increased risk of developing solutions that are not suitable for some Parties. The REC Code Manager has more accountability for responsibilities than SECAS is looking to implement. The actions of the Code Manager in the REC are largely carried out by the CSC for the SEC, or SECAS provides a recommendation to the CSC for those

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.	activities. The actions themselves already happen. CSC also already makes decisions on the prioritisation of modifications.
Western Power Distribution	Electricity Network Party	Yes	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. 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?	The intention was that Sub-Committees involved in the Change Process would not have these provisions extended to them. SECAS acknowledges that this is not covered in the legal text and will seek to amend it. The decisions made by Panel or Sub-Committee would be made in the same manner as they are now. This is by majority and is set out within the Terms of Reference of the Sub-Committees.
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	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 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: 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.	Whilst having a predefined set of criteria would add additional checks into the process, should a potential modification fall just outside these then this would still require a volunteer Proposer. The role of the CSC is to evaluate the initial Draft Proposals and would be able to prevent the progression if it felt it was appropriate to do so. The modification report has been updated to include more detailed rationale for those groups. 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. The SEC Panel delegation is a consequence of future proofing should new Sub-Committees be created that are not defined within the SEC. Currently, the

Question 1				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
				Operations Group is not a defined Sub-Committee within the SEC, and it was agreed by the Working Gorup that these new provisions should be extended to them. This highlights that Sub-Committees may benefit from this provision in the future.

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.	Please also see SECAS response to Question 1
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.	SECAS expects that the streamlining of this process should offset against the potential for additional modifications. We recognise that industry can only progress a certain number of modifications at one time, and prioritisation by the CSC is necessary to maintain an efficient process.

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	Please also see SECAS response to Question 1

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.	Please also see SECAS response to Question 1
Western Power Distribution	Electricity Network Party	No	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. 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?	Please also see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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.	Please also see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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.	Please also see SECAS response to Question 1
Western Power Distribution	Electricity Network Party	Yes	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. 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.	Please also see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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.	Please also see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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.	The misuse was in regards frivolous Draft Proposals being raised and thereby generating extra work without benefit. This was previously discussed at June Working Group.
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.	Please see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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.	The modification report has been updated to include more detailed rationale for those groups. Whilst some Sub-Committees are more involved than others within the change process, the whole industry has visibility of changes being progressed and has the chance to input. Although the TABASC are involved in the process, they do not make decisions. Their involvement is to provide recommendations to the Working Group based on their expertise to ensure that Proposed Solutions are workable and will not be detrimental to the current processes.

Question 11				
Respondent	**Category**	**Response**	**Rationale**	**SECAS Response**
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.	The proposed legal text states the Sub-Committee can raise Modifications “only in respect of matters within the scope of the Sub-Committee's remit”
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.	-
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	Please also see SECAS response to Question 1

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	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. 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?	Please see SECAS response to Question 1
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	Please also see SECAS response to Question 1

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	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. 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.	The Cross Code Steering Group would be able to designate a lead code. If the Panel was to raise a contrasting Proposal, this would still need to be determined by the Change Board with final vote.