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SEC Change Board Meeting 61x

22 December 2021, 10:00 – 10:50

Teleconference

SECCB_61x_2212- Draft Minutes

Attendees:

Category	Change Board Members
Change Board Chair	David Kemp (DK)
Large Suppliers	David Rodger (DR)
	Emma Johnson (EJ)
	Alex Hurcombe (AH)
	Tim Larcher (TL)
	Robert Johnstone (RJ)
Small Suppliers	Daniel Davies (DD) *(alternate for Carolyn Burns)*
	Gareth Evans (GE) *(part meeting – items 2-4)*
Network Parties	David Mitchell (DM)
	Gemma Slaney (GS)
	Paul Fitzgerald (PF)
Other SEC Parties	Gerdjan Busker (GB)
	Alastair Cobb (AC)
	Mike Woodhall (MW)
Consumers	Ed Rees (ER)

Representing	Other Participants
Data Communications Company (DCC)	David Walsh (DW)
	Charlotte Semp (CS)
	David Rollason (DR) *(part meeting – item 1)*
	Leigh Hill (LH) *(part meeting – item 1)*

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Ofgem	Rachel Clark (RC) *(part meeting – items 1 and 2)*
	Danielle Walton (DWn) *(part meeting – items 1 and 2)*
MHHS Programme	Chris Welby (CW) *(part meeting – items 1 and 2)*
SECAS	Bradley Baker (BB)

Apologies:

Representing	Participant
Large Suppliers	Emslie Law
Small Suppliers	Carolyn Burns
SECAS	Ali Beard
	Holly Burton

1. MP188 'Temporary Communications Hub Ordering and Delivery Rules extension' Change Board Vote

The Change Board was invited to perform the final vote on MP188 'Temporary Communication Hub Ordering Delivery Rules extension'.

No comments were raised, and the Change Board proceeded to vote.

Change Board Vote – MP188 decision:

The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	**Approve**
Small Suppliers	1	0	0	**Approve**
Network Parties	3	0	0	**Approve**
Other SEC Parties	3	0	0	**Approve**
Consumers	1	0	0	**Approve**
			Overall conclusion:	**APPROVE**

The view of the Change Board is that MP188 will better facilitate SEC Objective (a) for the reasons given by the Proposer in the Modification Report.

The DCC (DR) thanked the industry for its engagement on the updates to the Temporary Communications Hub Ordering and Delivery Rules (TCHODR) document.

The Change Board:

- **AGREED** that MP188 should proceed to vote;
- **AGREED** that MP188 should be **APPROVED** under Self-Governance; and
- **PROVIDED** rationale for this recommendation against the General SEC Objectives.

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There will now be 10 Working Days for any SEC Party who wishes to refer the Change Board's decision to the Change Sub-Committee (CSC) to do so. This referral period will close at **5pm** on **Monday 10 January 2022.**

MP188 will be implemented on **23 December 2021**. If any referrals are received and the Change Board's decision subsequently overturned, MP188 would be subsequently backed out of the SEC.

2. MP162 'SEC Changes required to deliver MHHS' Impact Assessment Request

The Change Board was invited to approve the DCC IA request for MP162 'SEC Changes required to deliver MHHS'.

A Change Board member (GS) noted that there were no reporting requirements covered in the business requirements. They were also concerned over progressing the current solution for Impact Assessment given a further change was expected to be raised which could incur further costs. They also highlighted concerns that the SEC modifications framework was not being fully followed in delivering MHHS.

SECAS (DK) noted the consultation comments around reporting had been discussed by the Working Group. The Working Group had concluded that no additional reporting is needed for MP162, and everything required would be captured under existing reporting. However, the DCC will monitor the proportion of on-demand Service Requests compared to scheduled requests.

The DCC (CS) confirmed the cost of the proposed follow-up modification around reducing the Target Response Times (TRTs) for Meter Data Retrievers (MDRs) wouldn't be higher than if the change was included under MP162. Separating it may be more cost-effective overall as this wouldn't delay the core changes needed for market-wide half-hourly settlement (MHHS). This follow-up change would require an increase in capacity to service.

Another member (AH) also had concerns that the MHHS changes were being shoehorned into the modification framework. They noted the high cost of the Impact Assessment, considering it still wasn't clear if the solution proposed will be the right way to improve settlement, and felt it was still to early to be requesting this.

The MHHS Programme (CW) noted the overall timeline for delivering MHHS. They acknowledged that ideally the design would be fully completed before the modification had been raised, but the expected DCC lead times means this had to be progressed earlier. The MHHS Programme is confident the DCC's proposed solution will meet the needs of MHHS but need the Impact Assessment completed to understand the costs and lead times. Ofgem (RC) noted the importance of MHHS in meeting net zero targets, and that delaying progression would delay the delivery of the benefits for the consumer.

The DCC (DW) highlighted the technical solution is the right option. The DCC has gone through several options and identified the most effective change within the DCC Total System to implement MHHS.

A Changer Board member (GE) queried how flexible the solution would be to changes in the wider MHHS solution. The DCC (DW) confirmed the solution developed so far would be carried forward, and any DCC Assessments would not need to start from scratch. The MHHS Programme (CW) noted the design is being firmed up, but it feels this is the correct solution. The target operating model (TOM) still stands, and the MHHS Programme is not envisioning any material changes to this. The DCC (DW) considered the only likely change would be around the source of the data feed into the Data Service Provider (DSP).

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A Change Board member (ER) also noted the uncertainty due to the wider design still being developed and felt there were still some significant design challenges to overcome. The DCC (DW) confirmed all 11 Service Providers would need to be thorough in their assessments and felt the variables around the solution had been refined as much as they could.

Change Board Vote – MP162 Impact Assessment request:

The voting outcome is shown below:

Party Category	Approve	Reject	Abstain	Conclusion
Large Suppliers	5	0	0	**Approve**
Small Suppliers	2	0	0	**Approve**
Network Parties	3	0	0	**Approve**
Other SEC Parties	2	0	1	**Approve**
Consumers	1	0	0	**Approve**
			Overall conclusion:	**APPROVE**

Members noted the concerns that had been raised but considered the responses provided in the meeting gave sufficient comfort to proceed with the Impact Assessment.

Ofgem (RC) noted the potential follow-up modification around the TRTs and that this would not negate the costs of MP162. They confirmed there would be further work on the TRTs due to the concerns raised by Supplier agents.

A Change Board member (GS) noted that under Ofgem's price control consultation MHHS had been classed as a programme of work but is also being progressed as a modification. Clarity is needed on where the costs for this are being picked up, to ensure these are not being charged twice.

The MHHS Programme (CW) thanked the Change Board for agreeing to progress MP162 to Impact Assessment. They acknowledged the concerns and challenges raised around the design and that they need to provide greater confidence to the industry around this.

A Change Board member (AC) considered that if work is still being completed on the design work, clarity on the timeline would be welcome. It could have been that an ad-hoc Change Board meeting could have been held in early January 2022 if the design work was completed by then, to provide greater certainty. They noted the pressure being exerted to progress this high-cost change through.

The DCC (DW) confirmed that the technical solution was unlikely to be impacted by any changes in the wider MHHS design, and that any further changes would likely be governance related. The DCC (CS) also noted they have been engaging with Ofgem over the solution design for two years and have gone through several iterations with Service Providers. If the solution had not progressed to Impact Assessment, this would have held up the wider programme.

The Change Board **AGREED** that a DCC Impact Assessment should be requested for MP162.

3. Treatment of non-responses to consultations

The Chair noted the discussion held at the previous meeting around how the Change Board should account for Parties that don't provide a response in consultations. Having considered this further

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since then, they proposed that the most pragmatic approach would be to treat them like an abstention and that the Parties have no strong preference either way.

A Change Board member (GE) considered the share of the implementation cost incurred by Small Suppliers would likely be smaller than the cost to submit a response to the consultation. Another member (AC) agreed that non-responses should be treated as an abstention. They try to raise changes in forums, but don't always get input. Another member (DD) agreed that enough opportunities were provided through forums and consultations, and that with the volume of consultations a no-response would likely be due to not enough time or no strong views.

A Change Board member (ER) considered it important that there is fair opportunity to respond. Given the volume of consultations, some can get missed, so queried if more time could be given to respond. Another member (GS) considered that if a Party was particularly against a given change they would prioritise responding to that consultation, noting the resource constraints a lot of Parties have.

A Change Board member (TL) queried the difference between 'abstain' and 'no response'. They noted that in other forums no response is taken as approval. Another member (GS) considered that there are too many Parties under the SEC who don't respond for such an approach to be taken here. They considered that if they didn't get a steer from their constituents, they would use their best judgement based on the Modification Report and the Change Board's discussions on the day. They considered it should be made clear that if a Party doesn't respond then their Change Board representatives would make any decisions on their behalf.

A Change Board member (DD) queried if this would be formalised and circulated to Parties. They also felt that non-responses could be highlighted more in Modification Reports as this could affect the business case. The Chair agreed to prepare a formal position based on these discussions and bring this to the next Change Board meeting for agreement.

A Change Board member (AC) noted that where Other SEC Parties do respond, there can be conflicting views from different participant types, so felt that Change Board members should be empowered to make decisions based on the feedback provided.

The Change Board **CONSIDERED** how non-responses to consultations should be treated.

ACTION 61x/01: SECAS to prepare a formal position on how the Change Board will treat non-responses to consultations, for agreement by the Change Board in January 2022.

4. Any Other Business

There was no further business, and the Chair closed the meeting.

Next scheduled meeting date: 26 January 2022

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