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MP078 ‘Incorporation of multiple Issue Resolution Proposals into the SEC - Part 2’

Modification Report Consultation responses

About this document

This document contains the full collated responses received to the MP078 Modification Report Consultation.

Summary of responses



Question 1: Do you believe that MP078 should be approved?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
OVO Energy	Large Supplier	Reject	The Arqiva costs associated with this modification are far too high and do not outweigh the benefits, if implemented. The costs are associated with 2 cycles of testing. CSP South only requires one cycle of testing. This double testing issue should be resolved by DCC before this modification can be implemented. It is unclear why 2 cycles of PIT testing are required and we do not believe that these costs should be passed onto SEC Parties due to the lack of confidence that Archiva have in their own testing cycles. The SSC has stated the risk that this is addressing is such that the business case for addressing this does not stack up. This all adds to us feeling that this Modification, as is, should be rejected.	-

Question 2: Please provide any further comments you may have

Question 2			
Respondent	Category	Comments	SECAS Response
OVO Energy	Large Supplier	In the December Working Group it was implied that the DCC would be presenting revised costs for the November 2022 SEC Release as a package of works. We were advised that this should provide a sizable reduction in testing costs as they will be shared amongst the modifications in scope. They considered the Design, Build and PIT costs to be higher than expected too. We have not seen these revised costs reflected in the modification and were expected mid December. We believe that this modification would benefit from the IRPs being split and progressing them separately. This way they can be measured under their own merit and the costs may be more acceptable.	<p>The potential reduction in costs from the November 2022 SEC Release package of works were discussed at December Working Group. DCC has since confirmed that they did not receive any updated costs from Arqiva.</p> <p>Although the costs cannot be separated for each IRP, SEC Parties did not provide any indication through this modification that either IRP was causing them issues that warranted incurring costs to resolve.</p>