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MP186 ‘Section D Review (2020): further enhancements’ Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP186 Refinement Consultation.

Question 1: Do you agree that the solution put forward will effectively resolve the identified issue?

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	<p>We agree with the principles that:</p> <ol style="list-style-type: none"> 1) If a Change Board decision under Self-Governance is appealed by a Party, the appeal is issued directly to the Authority – as this is a more streamlined appeal route. 2) Eligible SEC parties are able to raise an Alternative Solution to an existing modification - as this allows for more efficiency 3) Extending the duration of open DCC assessment under certain scenarios and subject to SECAS approval which could be overturned by the CSC if appropriate – as this allows for suitable checks for appropriate use of this new power 4) Extending DCC SLA from 15 to 25 WDs for completing a preliminary assessment – subject to the DCC ensuring they address any party responses or clarification request. This is an area the DCC needs to improve upon. 5) Changing references to the CSC from the Panel where applicable 	<p>SECAS notes the proposed variation whereby a party category be used to refine and endorse legal text whilst working with the Proposer and with oversight from SECAS. However, we do not believe this impacts the provisions for MRCs and we do not believe this needs to be codified, though we will review if this could be included within the Working Group's terms of reference. Party categories can already be used to refine legal text but all legal text must ultimately be considered by the CSC and subsequently decided upon by the Change Board or the Authority.</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>6) The Change Board being able to approve correction of any non-material typographical errors or minor factual inaccuracies within the legal text.</p> <p>Regarding Modification Report Consultation we are recommending a new Proposal C (adaption of Proposal A):</p> <p><i>The MRC could be made optional for any modification that undergoes the Refinement Process. <u>However, in considering this option the SCS/Working Group can delegate powers to a party category to refine and approve the legal text working with the proposer and overseen by SECAS.</u></i></p> <p>This working principle is working well for P096'DNO Power outage alerts' whereby the Working Group agreed the DNOs can refine and approve the legal text with the proposer (and which would then be brought back to the Working Group). It would be beneficial to codify the transfer of powers and tailoring of expert refinement by a party category which is solely impacted.</p>	
OVO Energy	Large Supplier	Yes	<p>Part of the solution is to recommend an extension of the preliminary assessment to 25 working days. We would like to understand the measures that will be put in place to monitor adherence to this.</p>	<p>All statistics on DCC Assessment durations are included within the SEC Operations Report which is presented to the Panel every month, and we will be working with the Panel to further enhance</p>

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
				this reporting going forward. SECAS also receives weekly updates from the DCC on the progression of assessments. SECAS monitor the DCC's progression with assessments and try to ensure there are no preventable delays.
British Gas	Large Supplier	Yes	These improvements will help streamline the modification process, whilst ensuring it remains robust. We have a few concerns on the individual elements which we have outlined below.	
Western Power Distribution	Network Party	Yes	<p>We believe that the following issues identified would be addressed via the proposed solution.</p> <ul style="list-style-type: none"> • Moving the Change Board's responsibility for approving the costs of an Impact Assessment to the Change Sub-Committee (CSC). • Simplifying the Self-Governance appeal route so that any appeal of the Change Board's decision under Self-Governance would be submitted directly to the Authority. • Revising who can raise an Alternative Solution, moving this away from the Working Group and instead allowing individual Parties eligible to raise a Draft Proposal to raise and own an Alternative Solution. • Amending the DCC's Preliminary Assessment duration be increased to 25 Working Days and 	

Question 1				
Respondent	Category	Response	Rationale	SECAS Response
			<p>that enhancements to the mechanism for extending DCC Assessment timescales be introduced.</p> <ul style="list-style-type: none"> Simplifying the approach to Modification Report Consultations (MRCs) can be simplified. 	

Question 2: Do you believe that the CSC's delegated duties for overseeing modifications' progression and timetables should be made enduring and for this to be reflected in the SEC?

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	We note that all respondents to this question 2 were in favour of reflecting the CSC's delegated duties for the Modification Process in the SEC. However, considering the Panel's views (see SECP_104_1305_09) on this proposal, we will leave the responsibilities set out in SEC Section D with the Panel, with these continuing to be delegated to the CSC via the Delegations Register. We will continue to progress with the proposal to move the responsibility for the approval of costs for an Impact Assessment from the Change Board to the CSC, which the Panel was supportive of.
OVO Energy	Large Supplier	Yes	-	As above.
British Gas	Large Supplier	Yes	The delegation of these activities to the Change Sub Committee seems to be working well, and should be made enduring. The committee meetings are efficient, allowing SECAS to confirm progression of modifications with a smaller group of more active industry participants.	As above.

Question 2				
Respondent	Category	Response	Rationale	SECAS Response
			The relevant parts of SEC Section D should be updated accordingly.	
Western Power Distribution	Network Party	Yes	We agree that CSC's delegated duties should be made enduring and be reflected in the SEC. We believe that having a dedicated Sub-Committee that focuses on overseeing Modifications progression and timetables and assessing modifications prior to be being converted from a draft proposal, has been very successful.	As above.

Question 3: Do you agree that responsibility for approving the costs for a DCC Full Impact Assessment should be moved from the Change Board to the CSC?

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Probably	<p>In most cases this is sensible. However, for more controversial modifications, we may want to retain the option of referring it back from the CSC to Change Board. For example, the recent MP134B proposal which was on the agenda of the last Change Board meeting for Impact Assessment approval, after having received considerable negative feedback in refinement consultation. I think that one did need the full Change Board to consider it, and it wouldn't have been appropriate for it to be delegated to CSC.</p> <p>One option, particularly as CSC happens before Change Board each month, would be for CSC to either approve the Impact Assessment or if there are any concerns to pass it back the Change Board. I think that would still enable CSC to handle the majority of Impact Assessment decisions, but would ensure any more sensitive ones could still be handled by Change Board.</p>	<p>We note the proposal that an allowance be made for the CSC to pass the approval of an Impact Assessment to the Change Board. However, we believe this to be inefficient and an unnecessary two-tier process. Also, Sub-Committees cannot pass delegated responsibilities to each other.</p> <p>We believe we have received enough support for the current proposal to progress it further.</p>

Question 3				
Respondent	Category	Response	Rationale	SECAS Response
Western Power Distribution	Network Party	Yes	<p>We agree that the responsibility for approving the costs for a DCC Full Impact Assessment should be moved to the CSC as they will have the full end-to-end oversight during the refine stage.</p> <p>We seek clarification on how the CSC will determine if a FIA should be requested i.e. is this by majority vote or unanimous vote? If this is not in the Legal Text is it included in the terms of reference?</p>	The CSC would determine whether an Impact Assessment request should be approved by holding a vote with the outcome being based upon the majority view, as per the current decision-making approach set out within the CSC's terms of reference.

Question 4: Do you agree that when a Change Board decision under Self-Governance is appealed by a Party, the appeal should be submitted directly to the Authority?

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	No	<p><i>It would be useful to have a reminder of what the circumstances surrounding the two previous occasions where Change Board decisions have been appealed. We were aware of one (and I think we were the party who appealed it) but are not sure what mod the other one relates to.</i></p> <p>We consider that the current process where an appeal to a Change Board decision goes first to the SEC Panel should remain.</p> <p>Codes should be prompted to sort out their own issues, where possible, allowing SEC Panel to resolve a dispute on a Self Governance matter, before any escalation to OFGEM.</p> <p>Going to Panel at least prompts a conversation amongst panel representatives (including OFGEM), and that means that OFGEM will be better briefed on the views and rationale of the case, if it does end up getting a</p>	<p>The previous examples for which this scenario occurred were SECMP0015 'GPF timestamp for reading instantaneous Gas values' and SECMP0021 'Increase the representation of the "Other SEC Party" category on the SSC and TABASC'.</p> <p>We note the views in this area as well as the support for our proposal from other respondents and the Working Group. However, we believe the benefits this proposal would bring are expected to be minimal, especially given the expected rarity of this event.</p>

Question 4				
Respondent	Category	Response	Rationale	SECAS Response
			<p>second appeal. This ensures that if OFGEM does need to take the final decision, they are well briefed on the situation, having already been in a Panel discussion on it, rather than trying to make a decision on a paper document review.</p> <p>We would also note that this has only happened twice in the past 7 years, and just because these two appeals ended up being reappealed to OFGEM does not mean that this would happen again in a third case. Two incidents within seven years hasn't put significant extra work on the SEC Panel, so we would prefer to keep the SEC Panel appeal review in the process. It would be a different matter if SEC Panel were needing to deal with an appeal every 3 months or so.</p>	
Western Power Distribution	Network Party	Yes	We agree that when decision under self-governance is appealed by a party the appeal should be submitted directly to the Authority to increase efficiency in the process.	

Question 5: Do you agree that Parties eligible to raise new Draft Proposals should be able to raise and own an Alternative Solution to an existing modification?

Question 5				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Partially	We agree, however, we believe that those that have raised an alternate solution outside of the working group then attend the working group when that particular modification is discussed.	We agree with the views provided and SECAS would manage this and ensure the Proposer is in attendance for meetings where the Alternative Solution is discussed.
British Gas	Large Supplier	Yes	<p>We agree with this proposal, and it brings SEC in line with other codes where anyone that can raise a Draft Proposal can also raise an Alternative Solution.</p> <p>Alternative Solutions should go through the same governance process as new Draft Proposals go through – ie they should have a ‘sanity check’ by the CSC. This will ensure that only a realistic number of Alternative Solutions can progress. This avoids a situation previously in UNC where one mod ended up with 15 alternative solutions, which was unmanageable.</p> <p>Alternatively, can SECAS themselves raise and own alternative solutions? This would be potentially much more efficient – with SECAS able to raise an Alternative Solution on behalf of the working group. Even through</p>	<p>The Change Sub-Committee could not close an Alternative Solution just because too many had already been raised for the given modification. However, the Working Group would be used to review, refine and ‘sanity check’ Alternative Solutions and provide feedback to the alternative’s proposer in the same way that it does for the Proposer’s Proposed Solution.</p> <p>If the CSC deemed the Alternative Solution had been raised simply to disrupt the progress of a modification, it could close the Alternative Solution. We would</p>

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Question 5				
Respondent	Category	Response	Rationale	SECAS Response
			SECAS can not currently raise a new Draft Proposal, they could be enabled to raise, own and lead on an Alternative Solution.	ensure Working Group input is sought on this first to help inform the CSC's decision. We note the suggestion that SECAS be allowed to raise Alternative Solutions. However, this is similar to the Proposed Solution under MP149 'Effecting Changes to the Smart Energy Code efficiently' which has been rejected. Therefore, we do not intent to take this proposal forward.
Western Power Distribution	Network Party	Yes	Agree with the proposal, however would like clarification that the process of developing and considering the alternative solution will be done alongside the existing modification and solution.	Yes, any Alternative Solution(s) would be fully refined and assessed to the same degree as the Proposed Solution and fully documented in the Modification Report before it is returned to the CSC to progress forward to decision.

Question 6: Do you agree with the revised provisions for the DCC being able to request an extension to complete a DCC Impact Assessment?

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Yes	<p>We agree with this proposal, which makes sense, but consider that if it is introduced then the consequences of breaching the SLA for a non-material reason should be tightened.</p> <p>Qn – can you confirm if DCC Impact Assessments costs are fixed, once approved, or if the DCC takes more time does the DCC cost of the Impact Assessment rise?</p>	<p>We can confirm that DCC Impact Assessment accosts are fixed costs. If the duration needed to be extended for an Impact Assessment, the cost would not increase as a result.</p>
Western Power Distribution	Network Party	Yes	<p>Agree with views to allow DCC to request from SECAS an extension to the deadline, however is it right for SECAS to decide?</p> <p>Should CSC get the request to approve an extension rather than just overturn SECAS decision?</p> <p>Are there different answers depending on the reason for the extension, i.e. SECAS reprioritising might be ok for SECAS to approve, if it is just challenging should DCC customers (the CSC) be the ones to sign off?</p>	<p>We have proposed that SECAS be given the first sign-off for a request to extend a DCC Impact Assessment in order keep the process as efficient as possible. If the request had to go to straight to the CSC first, it could result in waiting up to a month for a decision on the request.</p> <p>In our proposal the CSC would still be allowed to review all requests to extend a DCC Impact Assessment and if it</p>

Question 6				
Respondent	Category	Response	Rationale	SECAS Response
				overruled SECAS' decision, the SLA that the assessment is subsequently measured against would be revised accordingly.

Question 7: Do you agree that the service level agreement (SLA) for DCC Preliminary Impact Assessments should be increased from 15 to 25 Working Days?

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1 and subject to the scenarios and conditions set out.	
OVO Energy	Large Supplier	Partially	We would only be happy to agree to the extension if there was a process in place to hold DCC to account if, for whatever reason, they do not meet the extended deadline.	SECAS cannot penalise the DCC for not delivery assessments on time. However, it does hold the DCC to account by reporting to the Panel on its assessment performance as well as highlighting to the CSC any delays to modifications caused by late DCC assessments.
British Gas	Large Supplier	No	<p>seems high. Perhaps an increase to just 20 days may be more appropriate.</p> <p>Qn – Do we know how many Preliminary Impact Assessments go over the current 15 days SLA?</p> <p>Qn - Are there any constraints in DCC's contracts with its subcontractors that mean DCC is unable to get the required information from their subcontractors within the required SLA? When Preliminary Impact Assessments currently go over the current 15 days SLA, is that because of DCC or because of third parties it is relying upon?</p>	<p>Of the 73 DCC Preliminary Assessment requests accepted, 63 have gone over the 15 Working Day SLA. The average duration for DCC Preliminary Assessments is 30 Working Days. We believe that Data Service Provider (DSP)-only Preliminary Assessments are returned considerably quicker than the 30 Working Day average.</p> <p>The DCC advised that it has no contact, contract, or leverage with its Service Providers subcontractors. It noted the following reason for when Preliminary</p>

Question 7				
Respondent	Category	Response	Rationale	SECAS Response
				<p>Assessments go over the 15 Working Day SLA:</p> <ul style="list-style-type: none"> • The modification is very complex, and it takes a while for the Service Providers (contractors) to pull together their responses • There are enquiries and clarifications to resolve with SECAS and/or the business Proposer • Requirements can be ambiguous or require some form of additional information • The Service Providers (contractors) return their responses late to the DCC due to resource constraints
Western Power Distribution	Network Party	Yes	We agree that the SLA for the DCC to complete PIA is extended from 15 Working Days to 25 Working Days, to allow sufficient time for the DCC to challenge its Service Providers on the responses submitted, as well as address complex or high volumes of clarification requests.	

Question 8: Do you believe that Modification Proposals submitted by the Panel should always be subject to the Refinement Process?

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	No	<p>We are confused by this question and proposed change. It appears that only one SEC Modification has ever been raised by the SEC Panel, and that was SECMP0001, which was just a small text change.</p> <p>Regardless of who has raised a Modification Proposal, it should go through the same scrutiny and triage with CSC as any other Modification Proposal.</p> <p>There is the option for mods to go straight to report phase built into the current process, if considered appropriate. For example, MP200 Faster Switching consequential changes to the SEC (raised by OFGEM) was able to progress directly to Report phase, through normal channels.</p>	As we are not going to take forward the proposal to make the CSC's delegated responsibilities in the Modification Process enduring (see response to question 2), we believe these provisions should remain unchanged with all modifications raised by the Panel being subject to the Refinement Process. This will futureproof the arrangements should the Panel later decide to revert modification oversight to itself.
Western Power Distribution	Network Party	No	We believe that if a panel raised modification meets relevant criteria, as per current draft proposals it should be eligible to progress straight to the report phase. By	

Question 8				
Respondent	Category	Response	Rationale	SECAS Response
			making all modifications go into a refinement process could cause unnecessary delays.	

Question 9: Do you believe either Proposal A or Proposal B for MRCs should be developed further, or do you believe the current provisions for MRCs should remain unchanged?

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Proposal C (ENWL recommended)	<p>We recommend an alternative Proposal C (adaption of Proposal A) as follows:</p> <p><i>The MRC could be made optional for any modification that undergoes the Refinement Process. <u>However, in considering this option the SCS/Working Group can delegate powers to a party category to refine and approve the legal text working with the proposer and overseen by SECAS.</u></i></p> <p>This working principle is working well for P096'DNO Power outage alerts' whereby the Working Group agreed the DNOs can refine and approve the legal text with the proposer (and which would then be brought back to the Working Group). It would be beneficial to codify the transfer of powers and tailoring of expert refinement by a party category which is solely impacted.</p>	
OVO Energy	Large Supplier	Proposal A	Providing that there are no changes to the modification following the refinement consultation stage.	
British Gas	Large Supplier	Do nothing	We consider that the current provisions for MRCs (where all mods undergo a Modification Report Consultation) is important and should be maintained.	

Question 9				
Respondent	Category	Response	Rationale	SECAS Response
			<p>Depending on staffing availability not all SEC parties are able to keep fully on top of all open mods, and may not notice that a modification is about to pass to Change Board vote, especially if it has been a long time in refinement and development.</p> <p>The Modification Report Consultation seems an important step, to allow all parties a final chance for consideration.</p>	
Western Power Distribution	Network Party	Proposal A	<p>We agree with Proposal A however acknowledge that some Parties may wait to respond until the MRC is issued and therefore if proposal A is progressed there will need to be some engagement/education with industry to ensure they are fully understanding of the new process and that there views may need to be submitted during the Refinement process.</p> <p>We don't believe Proposal B should be progressed as we believe this could add unnecessary delays to modification that are straight forward and would otherwise go straight to MRC.</p>	

Question 10: Do you agree that the legal text will deliver MP186?

Question 10				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Yes	The changes to the legal text seem correct.	
Western Power Distribution	Network Party	Yes	-	

Question 11: Do you agree the proposed re-worded clauses are in sufficiently plain English and the restructure of SEC Section D aligns better with the order of steps in which the process is carried out?

Question 11				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Yes	The rewording of the text in Section D seems clear, and should be easier to follow.	
Western Power Distribution	Network Party	Yes	-	

Question 12: Do you agree with the proposed implementation approach?

Question 12				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	This modification does not impact the DCC or SEC Party Systems or business processes and can be implemented in any scheduled SEC Release.	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Yes	Qn: Does implementation definitely need to be linked to a certain SEC Release date (Feb/Jun/Nov etc) or could it be released immediately, on an adhoc basis, in order to avoid delay?	SECAS aims to release modifications in batches for efficiency. However, where it is not appropriate or efficient to implement a modification in a scheduled release, an additional ad-hoc release of new SEC content may occur. The CSC approves the implementation approach upon considering the final Modification Report, including any Refinement Consultation responses.
Western Power Distribution	Network Party	Yes	-	

Question 13: Will there be any impact on your organisation to implement MP186?

Question 13				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	No	See our response to Q12	
OVO Energy	Large Supplier	No	-	
British Gas	Large Supplier	No	We will continue to engage in the modification process, and respond / participate as appropriate.	
Western Power Distribution	Network Party	Yes	We will be positively impacted by a clearer and more efficient modification process.	

Question 14: Will your organisation incur any costs in implementing MP186?

Question 14				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	No costs	See our response to Q12	
OVO Energy	Large Supplier	No	-	
British Gas	Large Supplier	No costs	We will continue to engage in the modification process, and respond / participate as appropriate. We would not incur any specific extra costs.	
Western Power Distribution	Network Party	No costs	-	

Question 15: How long from the point of approval would your organisation need to implement MP186?

Question 15				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	n/a	n/a	
OVO Energy	Large Supplier	Immediately	-	
British Gas	Large Supplier	None	Could implement immediately.	
Western Power Distribution	Network Party	N/A	-	

Question 16: Do you believe that MP186 would better facilitate the General SEC Objectives?

Question 16				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	We agree the proposal will better facilitate General SEC Objective (g).	
OVO Energy	Large Supplier	Yes	As set out in the modification report.	
British Gas	Large Supplier	Yes	We agree this will better enable General SEC Objective 'g'.	
Western Power Distribution	Network Party	Yes	We agree the proposal will better facilitate General SEC Objective (g) To facilitate the efficient and transparent administration and implementation of this Code.	

Question 17: Do you believe there will be any impacts on or benefits to consumers if MP186 is implemented?

Question 17				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	n/a	n/a	
OVO Energy	Large Supplier	Not measurably	-	
British Gas	Large Supplier	No	No impact either way.	
Western Power Distribution	Network Party	No	-	

Question 18: Noting the costs and benefits of this modification, do you believe MP186 should be approved?

Question 18				
Respondent	Category	Response	Rationale	SECAS Response
Electricity North West Limited	Network Party	Yes	See our response to Q1	
OVO Energy	Large Supplier	Yes	-	
British Gas	Large Supplier	Partial	See responses to above questions for detail on where we don't agree.	
Western Power Distribution	Network Party	Yes	-	

Question 19: Please provide any further comments you may have

Question 19			
Respondent	Category	Comments	SECAS Response
Electricity North West Limited	Network Party	<p>We agree with Ofgems' comments and we believe this proposal does add improvements to the Modification process. Further improvements would be to codify the SCS/Working delegating powers to a party category to refine/approve the final legal text prior to voting where appropriate. As per our 'Proposal C'. This would improve efficiencies.</p> <p>Also, we would recommend as part of this Section D review a new obligation (f) is placed upon the DCC under Section 5.8 'Analysis by the DCC' to ensure the DCC are obliged to address each of the concerns raised by a party in any impact assessment and give those SEC parties sufficient notice and time to review the impact assessments in order to better respond to draft legal text drafting or voting.</p> <p>Ofgem has specifically asked the DCCs to improve their stakeholder/user engagement as part of the annual Ofgem price control reviews. Examples, where the DCC could have improved upon their SEC party feedback in the earlier stages is regarding issues raised by DNOs on the MP096 and MP162 modification refinement timescales and the impact of the proposed solutions on DNO systems. This would improve transparency and efficiency of the modification refinement process.</p>	<p>Please see our response to question 1 for our comments around delegating responsibility to review legal text to a specific Party category.</p> <p>We do not think the proposed new Section 5.8 (f) is necessary. This is due to existing requirements for the Working Group and any applicable Sub-Committees to act as a sounding board and review DCC solutions. If upon reviewing the Modification Report, the CSC feels the DCC has not adequately addressed industry concerns, it can send the report back for further work in the Refinement Process.</p>
OVO Energy	Large Supplier	-	
British Gas	Large Supplier	None	

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Question 19			
Respondent	Category	Comments	SECAS Response
Western Power Distribution	Network Party	We wonder whether there should be provision for the WG to agree for a Sub Section i.e. DNO's to refine and approve the solution and legal text before being brought back to the WG. This principle is currently being used for developing MP096 and appears to be successful.	SECAS notes the proposed variation whereby a party category be used to refine and endorse legal text whilst working with the Proposer and with oversight from SECAS. However, we do not believe this impacts the provisions for MRCs and we do not believe this needs to be codified. Party categories can already be used to refine legal text but all legal text must ultimately be considered by the CSC and subsequently decided upon by the Change Board or the Authority.