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SEC Modification Proposal Form – SECMP0051

Mod Title

Section D Review: Amendments to the Fast Track Modification process

Submission Date

5th April 2018

Details of Proposer

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Details of Representative (if applicable)

Name:	n/a
Organisation:	n/a
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1. What issue are you looking to address?

SECAS has been looking at ways to improve the SEC change processes and, at the SEC Panel's request, undertook a full review of SEC Section D.

One of the review's recommendations was to align the Fast Track Modification process with that followed by other Codes.

2. Why does this issue need to be addressed? (i.e. Why is doing nothing not an option?)

Fast Track Modifications were introduced across the industry Codes in order to provide a quick and efficient route for self-evident changes to be progressed quickly without unnecessary bureaucracy. Such changes include correcting typographical errors, inconsequential reference changes, or resolving conflicts in legal text between two other approved modifications.

The current SEC Fast Track Process requires the Panel to raise such a modification one month, then approve it the next month after the industry has had the chance to review and comment on the proposal. In practice, this only saves around two weeks compared to if the modification was submitted directly to the Report Phase as a Self-Governance Modification. This does not provide the efficient process that was envisioned for the Fast Track Process when it was first introduced across the industry Codes, and is inconsistent with other Codes such as the BSC or the CUSC.

3. What is your Proposed Solution?

This modification seeks to implement the same Fast Track Process under the SEC that is used in other industry Codes such as the BSC or the CUSC, as follows:

- The Panel will be able to simultaneously raise and approve a Fast Track Modification at the same meeting. It will only be able to approve the modification as a Fast Track Modification if that decision is unanimous. If this decision is not unanimous, the Panel must progress the modification down a different route (e.g. direct to the Report Phase as a Self-Governance Modification).
- If the Panel approves the modification as a Fast Track Modification, Parties will have a 15 Working Day window in which to object to the decision.
 - If an objection is received, the modification is returned to the Panel for it to progress down a different route.
 - If no objections are received, the decision to approve is final and the modification is implemented on the agreed date.

We consider that criteria similar to that under other Codes should be introduced against which the Panel would judge whether a modification is Fast Track or not.

In addition, Fast Track Modifications can currently only be raised by the Panel. We believe it would be more efficient if any participant able to raise a modification is able to request that their modification be Fast Track. The Panel will then determine if this is the case when it first considers the Modification Proposal.

The solution that we propose to implement under this modification is that documented in Section 4 of SECAS's Section D Review Consultation document.

4. What SEC objectives does this Modification better facilitate?			
<p>This modification will better facilitate SEC Objective (g) 'facilitate the efficient and transparent administration and implementation of this Code'.</p> <p>Streamlining the process for progressing and approving self-evident changes will improve the efficiency of the process. The Panel will only need to consider a Fast Track proposal once, rather than twice, before it is approved. The requirement for the Panel's approval of a Fast Track Modification to be a unanimous one will provide a sanity-check on whether a modification meets the criteria to progress as a Fast Track Modification.</p>			
5. What is the requested Path type?		Path 2	
<p>This modification will make material changes to the processes in SEC Section D. This satisfies criteria (d) in the list of criteria in SEC Section D2.6 for a modification to require an Authority determination.</p>			
6. Are you requesting that the Modification Proposal be treated as Urgent?		No	
<p>This modification does not meet the urgency criteria.</p>			
7. What is your desired implementation date?			
<p>1 November 2018 (November 2018 SEC Release) – we believe that this modification can be included as part of this release. This will also achieve efficiencies by being implemented alongside SECMP0034 which is also amending Section D.</p>			
8. Which SEC Parties are expected to be impacted? (Please mark with an X)			
Large Supplier Parties	<input type="checkbox"/>	Small Supplier Parties	<input type="checkbox"/>
Electricity Network Parties	<input type="checkbox"/>	Gas Network Parties	<input type="checkbox"/>
Other SEC Parties	<input type="checkbox"/>		
<p>We do not believe that the implementation of this modification will have a direct impact on any SEC Parties, as it is seeking only to make changes to the Modification Process within the SEC. However, SEC Parties may benefit from the enhancements to the process that this modification seeks to make, allowing for a more effective and efficient assessment of changes.</p>			
9. Which parts of the SEC will be impacted?			
Section D			

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10. Will there be an impact on Central Systems? (Please mark with an X)

DCC Systems	<input type="checkbox"/>	Party interfacing systems	<input type="checkbox"/>
Smart Metering Systems	<input type="checkbox"/>	Communication Hubs	<input type="checkbox"/>
Other systems	<input type="checkbox"/>		

There will be no impact on Central Systems.

11. Will there be any testing required?

No testing will be required.

12. Will this Modification impact other Energy Codes?	No
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We do not expect any other Code to be impacted by this modification.

13. Will this Modification impact Greenhouse Gas Emissions?	No
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There will be no impact on greenhouse gas emissions.