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Stage 04: Modification Report Consultation Responses

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
▶ 04	Decision

SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'

About this document

This document contains the collated responses to the SECMP0029 Modification Report Consultation (MRC). The Change Board will consider these responses when making its determination on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Selin Ergiden on 020 7090 1525 or email SEC.Change@gemserv.com.

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 1 of 16

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Content

Summary of Responses	3
Question 1	4
Question 2	7
Question 3	10
Question 4	12
Question 5	14

About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0029.

The Change Board will consider these responses at its meeting on 18th April 2018, where it will determine whether SECMP0029 should be approved or rejected.

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 2 of 16

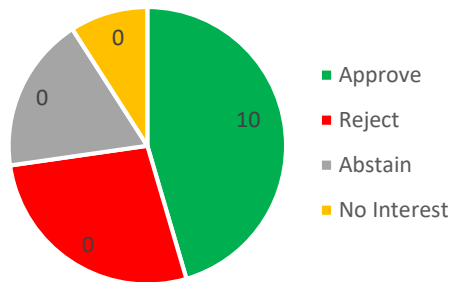
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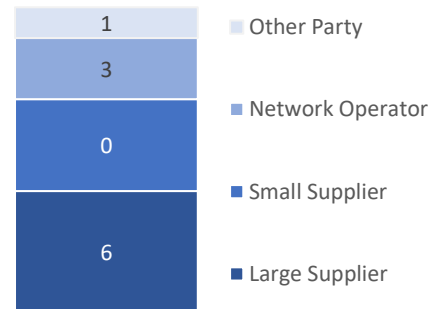
Summary of Responses

This section summarises the responses received to the SECMP0029 MRC.

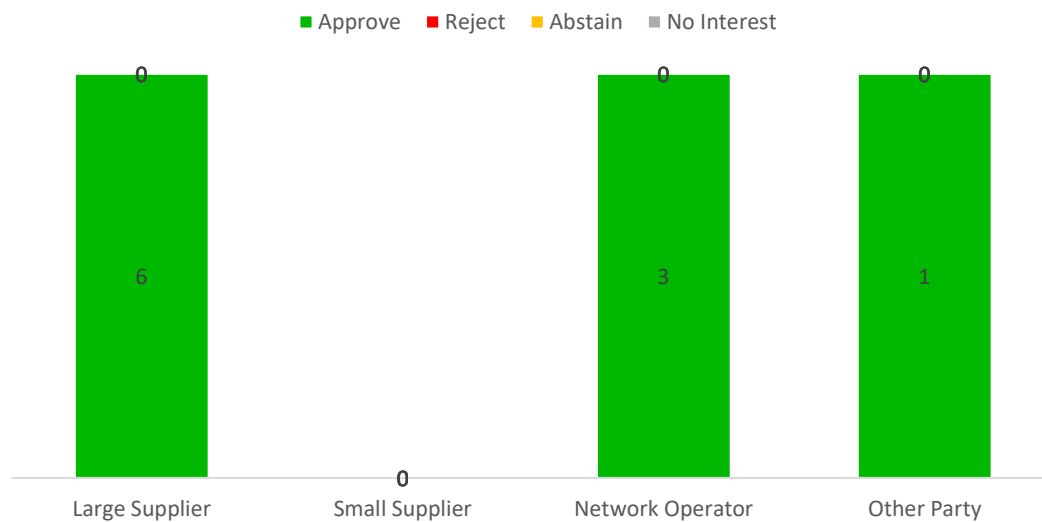
Respondents Views



Number of Respondents (by Party Type)



Views by Party Type



SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 3 of 16

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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN believe with the proposed better facilitates the General SEC Objective (a) and should be approved.
E.ON	Large Supplier	Yes	<p>The implementation of this solution would bring efficiency to the current process by which a zero balance is achieved on the registers in question, and therefore this modification arguably facilitates SEC Objective (a).</p> <p>We do not believe a directional correlation between debt information and energy management has been empirically established, we do not therefore agree that this modification will better facilitate SEC Objective C (we acknowledge that it might).</p>
Utilita Energy	Large Supplier	Yes	As the proposer of this modification we strongly maintain that SECMP0029 better facilitates SEC objective (a) and (c) through introducing DCC obligations that will help reduce service disruption for DCC Users and consequential customer impacts
Western Power Distribution	Network Operator	Yes	We believe that this modification better facilitates SEC Objective (a) as it will help to facilitate the efficient operation of Smart Metering Systems. We also believe that this modification better

SECMP0029

Modification Report
Consultation
Responses

DD MONTH YEAR

Version 0.1

Page 4 of 16

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			facilitates SEC Objective (c) by providing information so Energy Consumers can manage their use of gas and electricity.
Electricity North West Limited	Network Operator	Yes	Yes we agree that SECMP0029 better facilitates SEC Objective
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	<p>In our view, it is clear that SECMP0029 better facilitates SEC Objective A in that it will achieve the efficient operation of SMS.</p> <p>We also believe SECMP0029 better facilitates SEC Objective B in that it will enable the DCC to efficiently discharge its obligation to perform BCDR tests.</p> <p>We further think that SECMP0029 might be said to better facilitate the transparent implementation of the SEC, given that BCDR is a feature of the Code.</p>
EDF Energy	Large Supplier	Yes	<p>We agree that the proposed solution better facilitates SEC objective (a) and the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.</p> <p>Implementing a process that better defines the process by which DCC will consult with Users on its plans for BCDR testing, and which provides more notice that such testing will take place, will ensure that the impacts of BCDR Testing on Users, and therefore on their customers, can be better managed.</p>

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 5 of 16

This document is
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nPower	Large Supplier	Yes	We believe that SECMP0029 should be approved as it facilitates SEC Objectives.
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	We agree with the view of the WG that this modification will better facilitate Objectives A and C.

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 6 of 16

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Question 2

Q2: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agree that SECMP0029 should be approved?

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN will be able to plan for any such event. This will minimize the administrative burden that lost service requests would trigger.
E.ON	Large Supplier	No	<p>We do not support the implementation of SECMP0002 because it has no evident cost-benefit case. The costs that DCC have attributed to this modification surpass our understanding entirely; we cannot see that there is any justification that would warrant such a cost to achieve an outcome which is already achievable (albeit via a different method).</p> <p>We would be interested to understand the details of how DCC reached the extortionate price tag of £2.5m, for what ought to be a relatively small and simplistic change. It ought to be acknowledged by DCC that costs such as these (with consideration to overall Programme costs) are likely to become a disincentive for raising Modifications. As a consequence such costs may be perceived as a) becoming a barrier to innovation within the market, and b) a failure to uphold the objectives of the SEC, both of which seemingly contravene requirements of the DCC Licence</p>
Utilita Energy	Large Supplier	Yes	<i>We strongly believe this modification should be approved. This modification puts in place new requirements on the DCC in relation to BCDR testing which will enable more sufficient</i>

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 7 of 16

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			<i>supplier planning to avoid avoidable customer disruption when the DCC system has a planned outage.</i>
Western Power Distribution	Network Operator	Yes	We believe SECMP0029 should be approved. The costs are minimal and it will ensure we are provided with notice of the outages so we can put internal processes in place to accommodate this.
Electricity North West Limited	Network Operator	Yes	Yes we support SECMP0029 being approved. Although there is no direct mitigation we can put in place for these events - being given notice by the DCC will at least make us aware in advance of the forthcoming BCDR testing. We also would also reasonably expect the DCC as a competent service provider to already be ensuring that there is no data loss during a DR exercise. The proposed amendments make this an explicit obligation on DCC
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	While we agree that SECMP0029 should be approved it is not yet clear what the quantifiable benefits that will be achieved will be. This will be dependent on what happen in any consultation period and the extent to which User input is accounted for in any final BCDR Test Plan. It is also not clear whether the new 60 day notice period is appropriate – and whether reactive changes need to be made within this period that effectively negate the benefits of having this period in effect.

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 8 of 16

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nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	We stand by our comments provided in the Working Group Consultation that the implementation of this change will ensure oversight by DCC of potential impact to end consumes, and that as there are no costs or impacts to our organisation resulting from this modification we are fully in support of this improvement being made.

SECMPO029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 9 of 16

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Question 3

Q3: Do you agree that draft legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	
E.ON	Large Supplier	Yes	
Utilita Energy	Large Supplier	Yes	Yes, we support the proposed drafting and believe it supports the Working Groups preferred solution.
Western Power Distribution	Network Operator	Yes	
Electricity North West Limited	Network Operator	Yes	Yes we agree that the proposed legal text (Attachment B) for SECMP0029 delivers the intention of SECMP0029.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text.

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 10 of 16

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Smart Energy Code

nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	

SECMPO029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 11 of 16

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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	
E.ON	Large Supplier	No	We do not believe this modification should be implemented. We note however that the suggested date accords with Release Management Policies currently subject to consultation, but we do not believe that a period of just shy of 3.5 years is a suitable precedence to set for the implementation of modifications if this were to be approved
Utilita Energy	Large Supplier	Yes	We believe this modification should be implemented as soon as reasonable practical.
Western Power Distribution	Network Operator	Yes	An early implementation date will ensure SEC parties are given notice of any testing to be carried out in the second half of 2018. This will be particularly useful as the rollout ramps up.
Electricity North West Limited	Network Operator	Yes	Yes we agree with the recommended implementation date of 28th June 2018, if a decision to approve is made by 11th June 2018; or 1st November 2018, if a decision to approve is made after 11th June but by 15th

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 12 of 16

This document is
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Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date.
nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	

SECMPO029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 13 of 16

This document is
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Question 5

Q5: Do you have any further comments on SECMP0029?

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	No	
E.ON	Large Supplier	Yes	<p>The proposal of any optional functionality presents a level of potential discord in consumer journeys across Suppliers (with the potential to impact churn), and creates the potential for additional complexity in a world which will already be convoluted with disparate Operational Processes for SMETS1 and SMETS2.</p> <p>This proposal specifically allows the potential for 'opting-in' Users to incur ongoing costs for additional operational processes (use of new Service Requests (SRs)), because of the need to maintain this functionality alongside the existing processes for any inherited meters which are not functionally capable of utilising these SRs. If Service Requests become an audit requirement (DCC Capacity) in BAU, there could be additional negative consequences for Suppliers opting to use the proposed solution, where errors are made in the use of SRs across different Devices. Such a solution therefore appears to be a little impractical or risk-inherent, when considering sustainability.</p>
Utilita Energy	Large Supplier	No	

SECMP0029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 14 of 16

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Western Power Distribution	Network Operator	Yes	<p>The DCC BCDR proposal is that the systems will be taken down from 20:00 – 00:00. Having a start time of 20:00 can cause problems with the sending of RDP files. Having a later start time would mitigate this problem.</p> <p>During the Working Group meetings it was also discussed that going forward the DCC would look to run BCDR testing simultaneously with different Service Providers to minimise the amount of outage time. This hasn't been detailed in the consultation; however it does state that the DCC intend to raise a modification to provide more of the detail around how future BCDR tests will be carried out on an enduring basis.</p> <p>Although we agree with this modification, we are concerned by the amount of outage time that may be required to carry out this testing, due to the fact that we would not receive any power outage alerts during this time, and await further communication from the DCC.</p>
Electricity North West Limited	Network Operator	No	No we have no further comments.
Scottish Power Energy Retail Ltd.	Large Supplier	No	
EDF Energy	Large Supplier	No	
nPower	Large Supplier	No	No comments to add
TMA	Other SEC Parties	No	XXXX

SECMPO029

Modification Report
Consultation
Responses

5th April 2018

Version 0.1

Page 15 of 16

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SSE	Large Supplier	No	
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