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## SEC Section D Review Consultation Responses

Question 1: Do you agree with having the Change Board comment on a new modification before it is presented to the Panel?	
Opus Energy Ltd	Yes. Having the Change Board review the modification provides the opportunity to identify potential amendments that may be required, at an early stage.
Scottish and Southern Electricity Networks	SSEN agrees in principle to the proposal if this process expedites the time table rather than increasing it.
E.ON Energy Solutions	One of the functions of the Change Board is to “facilitate the development, refinement and discussion of potential variations to this Code prior to their formal submission as Modification Proposals”, so we must. However, we would question how this will work in reality, given that the arrangements of the Change Board work on a constituency basis. For example, it would be difficult for attendees to represent a view as to likely support for a modification from a constituency perspective, when many modifications divide opinion within a constituency. It is our view that much greater value would be attained from such a process if either an alternative group were to be used, or if the Change Board were to have a separate Terms of Reference (ToR) for this function wherein the attendees are representing their organisations, or they are independent, as is in-keeping with similar groups within the Industry (e.g. IREG).
Utilita Energy	<p>Although we fully support efforts to improve the SEC Change Process and appreciate the efforts taken by SECAS to reconsider the purpose of the Change Board, we believe that current proposals will further elongate the process for raising and progressing Modifications.</p> <p>We would have liked to see SECAS pushing the boundaries of its existing governance constraints and seeking to learn from other energy codes as well as exploring the possibilities from other markets. As a starting point, we would like to see the following ideas given strong consideration:</p> <p>Issues process:</p> <ol style="list-style-type: none"> <li>1. A Proposer has an issue or idea for a Modification which they can raise using a new form (i.e. a MIF under MRA, SIF under SPAA, DIF under DCUSA, Issues under the BSC etc.)</li> <li>2. A Change Board Issue Sub-group will meet monthly to discuss any new issues/potential Modifications which Proposers must attend. At the first meeting, the Issue Sub-group will have a role in advising the Proposer on initial views, suggesting possible solutions and identifying areas of change required to the SEC/DCC systems, to enable the Proposer to decide if a Modification is worthwhile.</li> </ol>

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3. The Issue Sub-group can send RFIs to gain further information from industry to help determine whether there is appetite for change and if so this will support the Proposer in completing an actual Modification form. This process should include as much solution development as reasonably possible without incurring DCC costs.
4. No DCC costs should be incurred during the issue process – PAs and IAs can only be raised in the Modification process.
5. Proposers will use the Change Board Issue Sub-group's feedback over one or several meetings to decide on the next routes i.e. should the issue/potential Modification be closed or is a Modification required.

#### Change Board duties:

1. The Change Board should manage the progression of issues, including overseeing the activities of a separate standing Issue Sub-group (see above) by setting meeting agendas, agreeing Issue discussion timetables etc.
2. The Change Board will also manage the end to end progression of all Modifications. This will include accepting new Modifications, agreeing Modification timetables, overseeing the activities of a new Modification Development Sub-group (in which all new Modifications will be developed under the remit of).
3. The Change Board will agree whether DCC PAs or IAs should be requested, assess the DCCs timeliness of impact assessment requirements and be responsible for justifying the cost to Panel. Where a Proposer disagrees with a decision of the Change Board, an appeals process will exist whereby the Panel acts as an escalation point.
4. The Change Board will direct the progression of all new Modifications that have either been developed through the Issue Sub-group, or have been raised by a Proposer without going through a pre-modification process. The Change Board shall consider the Proposers recommendations and decide if a Modification is ready to enter the impact assessment/ industry consultation stage. Where a Modification is ready, the Change Board will agree the length of impact assessment. Where the Change Board does not believe a Modification is ready, it can direct the Modification to the Modification Development Sub-group for refinement, or where the Modification is more complex (i.e. it may involve multiple options for a solution), it can direct the establishment of a new Special Modification Development Working Group to refine the Modification (SECAS would be tasked with coming up with a timetable and ToR for the Change Board to agree). Again, the Panel is available as a point of escalation to Change Boards decisions.
5. Following agreement of a Modification's impact assessment, comments will be brought back to the Change Board for consideration. Where a number of comments have been raised, the Change Board can advise the Proposer that the Modification be deferred to the Modification Development sub-group for further refinement or (where it was developed) where a Modification has received minor comments, typographical & non-material amendments can be made by the Change Board before vote. A Modification report becomes final after voting.

	<p>6. All Modifications that do not require Authority consent will be voted on by the Change Board with a subsequent appeal window, where a Modification requires Authority Consent the Change Board will make a recommendation straight to the Authority.</p> <p>SECAS responsibilities and obligations:</p> <ol style="list-style-type: none"> <li>1. The Issues form is considered by SECAS to make sure it is completed correctly and contains enough information to be formally raised, SECAS should have an SLA to provide any comments back to Proposers.</li> <li>2. Where a Modification is believed to be required following an Issues form being raised/discussed, a Modification is raised and SECAS will undertake a thorough review of the Modification Report and provide feedback to the Proposer before taking the Modification to the Change Board for consideration alongside the Proposers recommendations for progression. This should have specific codified timescales.</li> <li>3. A monthly summary paper will be taken to the Panel to explain the status of issues and Modifications within the process, Change Boards decisions at its previous meeting and an overview of DCC PA/IA expenditure and DCC timeliness.</li> <li>4. A monthly summary paper will also be taken to the Change Board to explain the status of issues and Modifications and an overview of DCC PA/IA expenditure and DCC timeliness.</li> </ol> <p>The aim of the above roles and responsibilities is to reduce Panel input into the SEC Change Process, allowing Panel to focus on other matters by delegating responsibility for Change Management and Issue Resolution to a Change Board of operational experts. The Change Board will be the central group to all Modifications and Issues and can decide whether a standing development group is the best route to develop a modification or whether a specialised Working Group is needed for development of particularly complex modifications.</p> <p>As the Change Board will be responsible for overseeing Working Groups, the standing issue sub-group and the Modification development sub-group they will be able to decide on whether Issues and Modifications can be grouped, providing efficiencies in the process. Panel can act as an escalation point when challenges arise or if a Proposer is dissatisfied with a decision of the Change Board.</p>
Electricity North West Limited	<p>Yes as the Change Board can then help inform the timetable and terms of reference for the modification on condition the Change Board voting system being amended at the same time as per our proposed solution under SECMP0041 modification proposal whereby each SEC Party is entitled to a vote on SEC variations; and SEC Change Board members' votes are bound by voting to SEC variations for their Party Category.</p> <p>In other words, we would not agree with granting the SEC Change Board further powers under the Assessment Stage in the absence of SEC parties having the an entitlement to vote and the Change Board to be bound by that voting.</p>
EDF Energy	<p>We agree that it would be useful to have a stage in the process before the Modification is presented to the Panel that undertakes a level of initial analysis. Amongst other things this should determine whether the problem that is being addressed has been clearly articulated, and that any proposed solution is a reasonable way of addressing that problem. This should enable the Panel to</p>

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	<p>make a more informed decision on whether to accept the Modification into the formal process.</p> <p>It would seem sensible that the Change Board, as an existing SEC Sub-Committee, is used to undertake this initial analysis on behalf of the Panel. However, it will need to be ensured that the members of the Change Board are sufficiently well informed to be able to carry out these additional duties, as this is a change from the current remit of the Change Board to which people sought nomination and election.</p>
<b>Npower</b>	<p>Yes, although we would like to understand the impact on the timeline for progression of a modification and to understand how this will be managed. For example, will the Change Board be meeting every month ahead of Panel to review new modifications and provide their comments or will this be managed ex-committee? Can SECAS provide a sample timetable for progression of a “simple” modification – i.e. one which needs no more than a month in the “development” stage of the process to show how this will work?</p>
<b>Utility Warehouse</b>	<p>We agree that the Change Board should consider the modification at the IAR stage but do not agree with this being reviewed by both the Change Board and the Panel, as this adds an unnecessary step into the process with no justifiable benefit. The modification should either be initially considered by the Panel, or the Panel should formally delegate those powers to the Change Board as with other codes.</p> <p>The main issue with the current modification process is it is overly complex and takes too long to progress a modification. Adding an additional step that doesn't introduce efficiencies into the process will only make things worse.</p> <p>We do think that the IAR should be reviewed by the Change Board but think this should be on behalf of the Panel, and not to provide a recommendation to the Panel as is proposed in this consultation.</p>
<b>DCC</b>	<p>Yes. DCC considers that, if implemented, this Modification Proposal would allow better scheduling, co-ordination and sequencing of Modifications. In addition to this, it would allow the Change Board to allocate Modification Proposals which relate to similar issues to joint Working Groups, and to coordinate scheduling and implementation timelines. The Change Board could also use this approach to take other industry changes into consideration whilst assessing a Modification Proposal, for example Faster Switching or the Code Governance Review 3 (CGR3). This would allow DCC to highlight any potential dependencies or conflicts within the DCC Systems, along with providing an indication of the development time needed by DCC and its Service Providers.</p> <p>However, DCC would not support a modification which would lengthen the overall process for managing Modification Proposals. We therefore support the Panel fully delegating the first review of Modification Proposals to the Change Board in order to avoid increasing overall timescales.</p>
<b>Western Power Distribution</b>	<p>If the modification is presented to the Change Board prior to the Panel there is the opportunity for further thought and more detail and information being provided, however we are not sure if this will just add a delay if the Panel were to send the modification to the Change Board for ‘Development’ anyway.</p>
<b>SSE</b>	<p>Yes, we support the use of the Change Board in considering new modifications. This will need to be efficiently managed to ensure there is sufficient time for the Change Board to consider and feedback to the Panel. However, we believe the process can be established in such a way that it does not become a barrier or further extend the Modification Process timescales.</p>

**Question 2: Do you agree with the introduction of the 'Development Stage' into the process? Do you have any comments on the purpose of this stage or how this will work?**

<b>Opus Energy Ltd</b>	<p>Yes. This proposal is similar in principal to the established MRA Issue Form (MIF) process as used by MRASCo. The pre-modification process enables a proposer to present a concept to the Change Board as a Working Group, without necessarily having mapped out every aspect of how the proposal will work in practice. This supports innovation, by enabling parties to draft proposals for changes they wish to introduce, but utilising the joint expertise of the Change Board to refine the proposal. It also provides the opportunity for the Change Board to "dismiss" at an early stage, proposals which, after consideration are deemed as unsuitable and to refine or recommend alternative solutions. The concept of the Change Board merging a batch of related changes into a single change is a good one as it should reduce costs and streamline activities. However, careful coordination may be required where changes are raised by multiple parties and, where one particular change is considered by the proposer as urgent, they should still have the option for it to be progressed as a standalone change.</p>
<b>Scottish and Southern Electricity Networks</b>	<p>SSEN agrees with this step as it is viewed as being necessary to remove any ambiguity (if any) and will ensure the modification is robust in its aim. It is fair to say that some modifications should not have been progressed at all.</p> <p>However, having taken into consideration DCC view on costs allocation per individual modification, when IT system change is necessary, it would be best if DCC could coordinate some modifications so the likelihood of them reaching a DCC Release hence sharing development costs would allow each modification to receive a more realistic development costs that is seen at present.</p> <p>Needless to say, that this step should not increase the timetable. Rather it should allow the refinement process timetable to be shorten in duration whenever possible. SSEN expect SECAS to monitor the effectiveness of this proposed change.</p>
<b>E.ON Energy Solutions</b>	<p>Our view concerning agreement will be assessed against information which has yet to be presented e.g. financial increase in SECAS fees, additional burden on Change Board Members etcetera. We are principally supportive of such a process for there are similar processes within the Industry that yield great value, and we would expect to see the same here. It will simply be a matter of the cost-benefit case.</p> <p>We would note the following points with regard to the current proposals however:</p> <p>We do not support the proposal that an undefined 'subset' of Change Board is sufficiently robust enough that any of the intended efficiencies will be realised, nor that the requirement to have minimum representation across industry could be met.</p> <p>We believe that in order for the Change Board may provide any useful input to Panel with regard to the implementation timetable, they would need to have visibility of the DCC's capacity model, the Maintenance Release Schedule, and the Release Management Document. The Change Board currently have no visibility of these documents.</p> <p>There appears to be a gap in the Development stage regarding the Draft Proposal (DP): where the proposer does not update their proposal in accordance with the Initial Assessment Report (IAR) provided by SECAS, and</p>



	<p>the Change Board are presented with only the IAR, we believe it is unlikely that they will be able to achieve any of the intended benefits of this stage.</p> <p>Having the Panel set the date by which the Change Board are required to report back to them needs additional consideration and clarification: there needs to be a balance between the 20+ monthly-standing Industry meetings and relevant Industry consultations with regard to burden for the Change Board, and the impacts to the Release Management Policy, DCC Assessments and timeline for implementation.</p> <p>Further thought is also required for the Issue process in our view: the Development process as proposed is Panel-directed, whereas the Issues process is User-directed. Replacing the latter with the former is not equitable under the current proposals.</p> <p>We believe that the role of the Proposers of other Modifications also needs additional consideration. If the Change Board were to propose that the DP progress alongside two existing modifications or two other DPs, but the proposers of the other two modifications or DPs do not wish for their modifications to be progressed with the same timeline as the DP being considered what happens?</p> <p>Further deliberation as to the withdrawal process is also warranted in our opinion: what happens if a proposer chooses to withdraw their DP and</p> <ul style="list-style-type: none"> <li>a) someone else picks up the DP, or</li> <li>b) none else picks up the DP, and</li> <li>c) in each instance, with consideration to the Change Board having recommended that the DP progressed with other modifications</li> </ul> <p>Specifically, we would like to understand the timelines and process-impacts of the above.</p>
<b>Utilita Energy</b>	<p>We believe a pre-modification phase is vital to any change process as it acts as a means for Proposers to come to industry with an initial idea for a change which industry can provide feedback on and provide suggestions for further development without the need to raise a Modification straight away. A similar approach is also adopted in the water market and helps reduce the number of Modifications that are raised at any one time.</p> <p>We believe the pre-modification phase works well under other codes where there is a dedicated standing group that all issues/potential modifications are taken to and are either developed by that group directly, or are directed to a special working group for development or even closed off where there is no industry appetite. Introducing similar arrangements to the SEC would allow efficiencies to be gained by not necessarily needing new working groups for every Modification, which is extremely hard to resource, and providing a place to discuss modifications which are necessary but lack interest</p> <p>We have provided our suggestions into how the SEC pre-modification process should work under question 1, we believe current proposals would add to delays in developing modifications and have involvement from too many SEC Sub-Committees.</p>
<b>Electricity North West Limited</b>	<p>Yes we agree with the introduction of the Development Stage and the increased involvement of the Change Board to enable the Proposer to receive an early indication of any issues with their proposal and likely level of support across the industry.</p>

	<p>However, again our agreement is on condition the Change Board voting system being amended at the same time as per our proposed solution under SECMP0041 modification proposal whereby each SEC Party is entitled to a vote on SEC variations; and SEC Change Board members' votes are bound by voting to SEC variations for their Party Category.</p> <p>In other words, we would not agree with granting the SEC Change Board further powers under the Development Stage in the absence of SEC parties having the an entitlement to vote and the Change Board to be bound by that voting.</p>
<b>EDF Energy</b>	<p>We agree that some form of pre-Modification process would be very useful – this would allow issues and potential Modifications to be discussed in an open forum. This should help not only to filter out Modifications that have no realistic chance of being approved, but also shorten the Refinement process by undertaking some of that work up front.</p> <p>We are concerned by the risk of overlap between the Development Stage and the Refinement Stage and potential for having the same conversations and debates under both parts of the process. We need to the Modifications process to be more timely and efficient than it is now, so it must be ensured that there is a clear demarcation between the Development and Refinement stages and the scope of the discussions that should occur in both. We would expect any analysis undertaken in the Development Stage to be relatively light touch – especially if it is to be undertaken by the change Board. Any more detailed analysis should be undertaken by a Working Group as part of the Refinement stage.</p> <p>As the Development Stage will be looking to consider potential approaches to addressing a problem it is vital that the DCC are involved in these discussions – they should be able to provide input on the cost-effectiveness of any potential solutions at this early stage which will help to inform whether a Modification should progress to the Refinement Stage or not.</p>
<b>Npower</b>	<p>Yes, we think this is a good idea. However, we would like to understand how the Change Board will act as the working group in developing the Mod, given that they may not be experts in the topic in question.</p> <p>Is there any intention for the Change Board to delegate this to a sub-group and if so, is this permissible under the SEC? How would members of the sub-group be chosen?</p> <p>We note that the Change Board will make a recommendation at the point where the modification is ready to move into the “refinement” stage. More information is needed to show how will it be agreed that a modification is ready to move on in the process? What if there is disagreement between the Proposer and the Change Board, how will this be managed? More clarity on this is needed.</p>
<b>Utility Warehouse</b>	<p>We agree that there is a need for a pre-modification process to be formalised under the SEC. However, we do not agree with the proposed “Development Stage” process that has been proposed in this consultation. Again, we believe that the modifications process needs to be less complex and introduce efficiencies and the proposed process doesn't achieve this.</p> <p>The benefits of a pre-modifications process / issue resolution process should be to allow a party to get an early indication on any issues with their proposal and initial views on industry support. This shouldn't just be restricted to the scope and objectives of the modification, and the proposed solution should be able to be considered in this process, where a full cost/benefit analysis or</p>

	<p>impact assessment wouldn't be required as part of the proposal. If a DP was refined in the pre-modification process, it would enable more modifications to progress directly to the Report Phase and remove the requirement for a dedicated working group to be established. The final decision on if a MP needs to go through a refinement stage should be made by the Panel.</p> <p>We don't see the need for the Panel to set the areas the Change Board / Working Group are required to assess, as part of a pre-modification process, and any timetables associated with this, as it should be for the proposer to seek these views from the group, with the requirements of Change Board / Working Group members underpinned by the Terms of Reference.</p> <p>We agree with proposal that the proposer decides on whether to withdraw their DP or progress to the Modifications Process at the end of the process.</p>
DCC	<p>Yes. DCC considers that the use of a 'pre-Assessment' group works well in other codes and should also be adopted in relation to the SEC. We also consider the open forum structure of Technical Specification Issue Resolution Sub-group (TSIRS) to provide well rounded consideration of DCC system change. As the Transitional Period ends, and Transitional groups fall away, there will be an increased need for a group of this type to provide a 'Sandbox' allowing broad discussions around the types of change needed, along with the priorities of all Parties in relation to change. We consider that input from all segments of industry and other stakeholders at an early stage to provide very valuable evidence and information, enabled better decision making throughout the process. We believe this early input could provide for faster and more efficiency in the Refinement Phase.</p> <p>The Balancing and Settlement Code recently introduced a 'Sandbox' to support these types of discussions, and Ofgem also maintains a 'Regulatory Sandbox' to allow collaboration and creative solution design. We believe this stage will facilitate greater collaboration, early discovery of challenges, and early buy in across different User categories. We expect that this forum would also allow an early 'steer' from the Regulators (Ofgem and BEIS during the Transitional Period) on the viability of changes. Furthermore, this would allow for better scheduling, prioritisation and alignment of changes. We attach the SPAA Change Process guidance incorporating a 'pre modification' comment period and simplified change process, which we consider could be a model for SEC change governance.</p>
Western Power Distribution	<p>We think a 'Development Stage' is a good idea. It will allow for more feedback and allow for solutions to be discussed and also allows for the aim of the modification to be altered if necessary. In the consultation stage 2.1 and 2.2 are written to be very similar, asking the same questions of the same people. We think that in the 'Development Stage' there should be the option to send a 'Request For Information' out to industry to get a feeling of what the industry thinks and if the industry believes there are any other thoughts or options that should be considered.</p> <p>Whilst we agree that efficiencies can be achieved by considering other potential modifications with the original Draft Proposal together, we do not agree that this should be during the 'Development Stage'. We feel that this would cause confusion and may result in the focus of the Draft Proposal and the issues it seeks to address being diluted.</p> <p>We would suggest that the batching of similar modifications should be undertaken once the draft proposal has been agreed to move to a Modification Proposal.</p>



SSE

We support the introduction of the 'Development Stage' to discuss and clarify the scope of the modification and what it is seeking to achieve. We agree that some form of collaborative session to develop pre-Modification content is beneficial and has assisted discussions in other Industry Codes.

Our concerns relate to the effective management and facilitation of the discussions of this stage, to ensure the subsequent Refinement stage is not a repeat of previous engagement regarding the modification.

Question 3: Do you agree with the process and purpose of the Refinement Stage?	
<b>Opus Energy Ltd</b>	Yes. Refinement should help to present an optimum solution. However, although there is a separate fast track process, it is important that the process is managed effectively so that it does not unnecessarily delay, for example, straightforward or urgent changes.
<b>Scottish and Southern Electricity Networks</b>	SSEN expects this stage to have benefited from the Development stage fully.
<b>E.ON Energy Solutions</b>	<p>The only evident changes to the Refinement stage that we can ascertain are that the scope of a Modification Proposal is fixed and cannot therefore be amended by a Working Group (WG), and that the Change Board are asked to vote on whether or not a Modification may progress to the DCC Impact Assessment stage.</p> <p>With regard to the former we would ask for clarification as follows: how does this change impact the timeline for raising an alternative? In addition, if nothing can be descoped from a Modification Proposal but the Working Group (WG) and ultimately the proposer, decide that the cost of progressing with the current solution is not viable: will the MP be progressed alongside an alternative with a lesser scope, will an alternative be allowed to progress where the original is withdrawn, or will a new DP with a lesser scope be required?</p> <p>Concerning the Change Board vote on whether or not to progress the Modification for DCC Assessment, we see little value in such an addition. The proposer may continue to progress their Modification regardless of the Change Board so there seems little change in the outcome of the process when compared to the current Change Process. If there were to be a stage added to the process to ensure a binding decision relating to the progression to DCC Assessment however, it would likely be challenged on the ground that it inhibits the Change Process. As such we are unclear on the intent of this additional step.</p> <p>Given the above, we find that we are not in a position to agree with the proposal.</p>
<b>Utilita Energy</b>	<p>We believe a refinement stage should only be used for more complex modifications that cannot be developed by a standing development group/ sub-committee of the Change Board. The Change Board should be responsible for agreeing if refinement is needed for new Modifications and if so what group would be best place to undertake the refinement i.e. the standing development group/ Change Board sub-group (for less complex changes) or a new or existing Specialised Working Group for more complex modifications (that may require extensive meetings to discuss possible solution avenues etc.).</p> <p>We also believe that the Change Board should have an appropriate level of challenge from the Panel regarding how Modifications are progressing through the process. At present there is no challenge to the Panel even though some modifications have not gone to vote despite being raised 2 years ago.</p>
<b>Electricity North West Limited</b>	No we do not agree with the Change Board voting on the merits of progressing the modification further based on the current voting mechanism rules. The current arrangements only allow SEC Parties to express a view on a Modification Proposal and the SEC Change Board Members are not bound by their SEC Party constituents' responses.

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	Our proposed solution under SECMP0041 modification proposal is for each SEC Party to be entitled to a vote on SEC variations; and SEC Change Board members' votes are bound by voting to SEC variations for their Party Category.
EDF Energy	<p>We agree that the main purpose of the Refinement Stage should be to develop the solution(s) and assess the case for change – including a full assessment of both the costs and the benefits of the modification. Given the scale of the costs involved in making changes to the DCC systems in particular, there needs to be an enhanced focus on quantifying the benefits of making any modification.</p> <p>The proposed process for the Refinement Stage seems reasonable, as noted in our response to the previous question it needs to be ensured that the discussions in this Working Group do not go back over ground that has already been covered in the Development Stage. We would expect that the Refinement Stage would be shorter than we are currently experiencing, as some of the work that is currently undertaken in this stage, especially discussion of the problem and the range potential solutions, will have already occurred.</p>
Npower	<p>Yes, this is an established part of the modification process and works well.</p> <p>However, given that a new Working Group will be set up at this stage to refine a modification, this Working Group may be made up of different people to those who have looked at it in the “development” stage and this may create a disjoint or risk of duplication of work which should be avoided.</p> <p>The consultation paper states that the Working Group is expected to include some of the Change Board members, this means that Change Board reps will end up attending a lot of meetings, which may not practicable and may have a detrimental impact on smaller parties.</p> <p>We note that the Change Board will vote on moving a modification forward into the “report” stage and if the Change Board vote is not in favour, it's up to the proposer to decide whether to continue and if so to justify their decision. More information on how this will work in practice would be beneficial.</p>
Utility Warehouse	<p>We agree that where a modification proposal requires a full assessment of the costs and benefits, and/or a DCC Impact Assessment to be completed, that this should enter the Refinement Stage to be further assessed by a working group. We do not agree with the assumption that any modification that underwent a Development Stage would require a Refinement Stage. If this was the case, it would significantly undermine the value of a Development Stage, addition additional costs without introducing any efficiencies. For standard modifications to the SEC, a proposer should be able to gain feedback at the Development Stage to enable them to refine their proposed solution so the MP is able to be progressed directly to the Report Phase.</p> <p>We also don't agree with the requirement for individual working groups to be established for each modification as part of the refinement process. This is inefficient and unnecessarily resource intensive, where a standing group could consider any modification impacting a specific area (e.g. a technical working group that reviews any modifications affecting devices and associated technical specifications, or a working group that reviews mods impacting DCC systems, etc.). There will still be occasions where a dedicated working group will need to be established, but it's not appropriate, or manageable to have 20+ working groups.</p>
DCC	Yes. The purpose of the Refinement Stage should be to reach consensus on the need for change, along with the most cost-effective means to achieve change. There have been criticisms of the length of time the current process takes and DCC has undertaken measures to reduce the amount of time we

	<p>take to complete our analysis in order to help address this. We that believe a robust refinement phase is crucial to delivering well-functioning solutions which are beneficial to all Users, and which are cost effective for energy consumers. The introduction of a vote before costs are incurred on full Impact Assessment should be considered as part of changes to assign an implementation date and possibly prioritisation of changes. We consider this process, being similar to other industry codes, provides the most efficient means for discovering evidence for a cost benefit analysis of each change.</p>
<b>Western Power Distribution</b>	<p>We believe that there is benefit to the Refinement Stage. This stage has a very structured work through of different solutions to what is by this point a very definitive requirement.</p> <p>We agree that costs and benefits are hugely important in assessing modification proposals. However, the proposer has the option to amend the scope of the modification and the issue or defect initially identified at any time whilst the modification is a Draft Proposal. We would suggest that costs and benefits should be considered once the draft proposal has been agreed and moved to a Modification Proposal.</p>
<b>SSE</b>	<p>We agree with the purpose of the Refinement Stage and we have comments where we would like to clarify some of the process steps and their description.</p> <p>Step 1: "If there are multiple related MPs, we will form a single Working Group to assess all of them."</p> <p>Given the desire to batch similar MPs to streamline WG and DCC IA costs, it would be beneficial to see further narrative on how this could progress in the subsequent steps. We would see batched as being more challenging to move forward in conjunction compared to a modification of merged MPs.</p> <p>For example, the timely production of the WG consultations and MP draft Mod Reports for consideration by the Change Board, in particular where we would want to ensure the batch of modifications would proceed as one to the DCC Impact Assessment, where required.</p> <p>Step 9: "If the Change Board recommended not proceeding but the Proposer elected to continue, they will be required to provide their rationale for this decision."</p> <p>Who will receive the rationale and what will be done with it? Is there an expectation of testing this rationale by the Panel and against what criteria?</p>

**Question 4: Do you believe that a mechanism for allowing the Panel to close stalling modifications should be introduced? Do you have any views on how this should work?**

<b>Opus Energy Ltd</b>	Yes, but subject to development of a robust process as referenced in the consultation. For example, if a proposer is seeking further information to support their proposal following feedback from the refinement/other stages, allowance should be made for how much work may be involved to gather this information. An appeals-type process could be introduced for which the proposer could present to the Change Board for cases where they consider an extension to be justified.
<b>Scottish and Southern Electricity Networks</b>	SSEN support the need to close stalled modification. However, based on each merit, perhaps due to lack of available solutions (DCC or market place at the time) it might be best to propose the modification to temporarily closed.
<b>E.ON Energy Solutions</b>	It is our view that Panel should not be permitted to close a Modification.  In the absence of definitions or a proposal it is difficult to understand the intention of this proposal; however it holds no value for us in so far as there is no consequence of having modifications open until the issue identified therein can be resolved, and it does not accord with best practice for change within the Industry. Further we would argue that such a mechanism may constitute an inhibitor to change; this is something which we would not endorse.
<b>Utilita Energy</b>	We believe Panel should have some processes and mechanism available to them in order to help close down Modifications. However, Panel should not be able to shut down Modifications just because a Modification is taking longer than expected. All Modifications should be given due regard before being closed down. It should also be made clear to industry where a modification has been closed against the proposers will.
<b>Electricity North West Limited</b>	Yes subject to clear criteria being met first before these powers can be invoked and which gives the Proposer options to withdraw or defer their proposal. The Proposer may have a legitimate reason to ask for the proposal to be deferred rather than withdrawn. The deferral of proposals are common in other code modification processes.
<b>EDF Energy</b>	We agree that a mechanism for allowing the Panel to close stalling modifications should be introduced, but as noted the criteria for when such powers could be used would need to be clearly defined.  We would expect that the introduction of the Development and the discussions proposed to take place in this stage would reduce, if not eliminate, the number of Modifications that are formally raised but which have no viable solution. We would also hope that a Proposer would not insist on keeping a Modification open in these circumstances. The role of the Proposer in the Modification may need to be more clearly defined within the SEC – they are not only responsible for raising the change and taking on board the feedback they receive from the Working Group and any consultation, but they should only keep a Modification open if they have a clear understanding of how it can be progressed.
<b>Npower</b>	We accept that stalled modifications do create problems and this has been the case in other industry codes, not just SEC – perhaps utilising CACoP? We think best practice would be for a consistent approach to be taken across all industry codes where possible.



	We agree that if the Panel are going to be given powers to withdraw modifications that have stalled then some very clear criteria needs to be put in place to guide Panel decisions.
Utility Warehouse	Yes, we agree that there needs to be an end point for all modifications. If a modification proposal is in a position to proceed to vote, and there is no solution available to resolve this, there should be a mechanism for the Panel to close this down if the proposer refuses to withdraw the modification. We would suggest that a recommendation or closure report from the working group should be provided to the Panel in these circumstances to allow them to make an informed decision on if the modification proposal needs to be closed.
DCC	<p>Not as written. Open governance should allow any Party to raise a Modification Proposal, and have its proposal fully developed and fairly assessed. The Authority holds the final decision powers, in part, to protect small parties and ensure fair competition.</p> <p>The issue that the SEC faces is that there is a backlog of changes that have struggled to achieve quorate Working Groups. The Panel has a duty to ensure that any Modification Proposal it deems suitable for development is fully developed before being assessed. DCC considers that powers to unilaterally terminate Modification Proposals against the wishes of the Proposer would require an appeal mechanism to protect the interests of smaller parties and parties from smaller constituencies. Such an appeal mechanism would need to be developed before a change of this nature could be implemented.</p> <p>The Panel should consider what existing powers available to it could be used to achieve an agreement with proposers regarding the best way forward for the issue they have raised.</p>
Western Power Distribution	We can understand that the Panel do not want Modifications left open indefinitely if they are not progressing, however, we have concerns around the Panel having the ability to close Modifications. This is an area that will need a lot of consideration and strict criteria. We would suggest that this is raised under a separate modification.
SSE	We support the introduction of a mechanism to allow the Panel to close stalling modifications. We agree that further discussion would be needed to determine how this could work and the criteria to apply.

## Question 5: Do you agree with the proposal to move the detail around how Working Groups operate out of the SEC and into a Panel-owned document?

<b>Opus Energy Ltd</b>	Yes. The additional flexibility that this would introduce, but still within a maintained 'Working Group Terms of Reference' should simplify processes.
<b>Scottish and Southern Electricity Networks</b>	SSEN agrees that the current SEC arrangements are too restrictive and support the proposal.
<b>E.ON Energy Solutions</b>	<p>We do not, and we feel it necessary to note three objections to this proposal:</p> <ol style="list-style-type: none"> <li>1) ToRs are a robust and necessary Industry standard, we would therefore not support their removal from Code to be at the liberty of the Panel,</li> <li>2) The rationale provided for this proposal appears to 'treat the symptom not the cause', which is not an appropriate way to address issues within this Industry, and</li> <li>3) To the point of the rationale provided, we feel it necessary to clarify that WG Member availability is not a known problem. There have been scheduling issues noted within this process that result from WG Member availability at the times proffered by the Code Administrator, because they overlap with standing, monthly Industry meetings, and/or are often requested with little notice during periods of significant congestion.</li> </ol> <p>It is our view that the most effective way to rectify the issue identified is to have the Code Administrator follow the guidance provided by Ofgem for Principle five of the Code Administration Code of Practice (CACoP), specifically the second and third points. In addition, an extension of the fourth point of this guidance (regarding notice provided) would likely enable WGs to be scheduled with relative ease, as it does for the scheduling of other non-standing groups within the Industry.</p>
<b>Utilita Energy</b>	<p>We agree that the detail describing how Working Groups should operate is probably not best located in the SEC and could better sit elsewhere. We have experienced long delays between SEC Working Group meetings which, although we understand can be down to external factors, means it is extremely hard to keep on top of what is happening under the different working groups we attend, especially with 6+ months between WG meetings with little to no update on progress being given.</p> <p>In other codes, we usually find Working Group meetings are held at least monthly to ensure continued momentum and fast progression of Modifications. We would like to see a single Modification group being established to discuss the development of all Modifications (i.e. Modifications which have progress to enable discussion at a meeting, if they do not they are not put on the agenda).</p>
<b>Electricity North West Limited</b>	Yes we agree that the Working Groups operating out of a Panel-owned document.
<b>EDF Energy</b>	Minimising the amount of detailed Modification process information that is included in the SEC would support the flexibility of the Modification process. As

	we have already seen smart metering and the SEC does not suit a 'one size fits all' approach, so the arrangements need to be able to flex to suit the needs of the specific change at hand, as well as change over time.
<b>Npower</b>	<p>Yes, as this is what happens in other codes and consistency should be applied where possible.</p> <p>The "Panel-owned document" should be drafted giving specific direction to the Working Group on what they need to consider when looking at modifications including what timetable they expect the group to follow.</p>
<b>Utility Warehouse</b>	We agree that the further flexibility in how Working Groups operate is needed and that this should be controlled through the Terms of Reference, which should be set by the Panel. As in our response to Question 3, we believe that there is a need for more standing working groups to be formed that can act as the working group for certain modifications, as directed by either the Panel or Change Board.
<b>DCC</b>	<p>Yes. DCC supports moving the rules governing Modification Working Groups to either a Subsidiary Document or Panel owned document. We consider this to be a pragmatic solution which recognises that the workings of the SEC are maturing.</p> <p>We also consider that other areas of the SEC may benefit from the adoption of such a pragmatic approach, for example in relation to certain SEC Subsidiary documents which would be better suited to a more flexible and rapid change process than that provided under Section D.</p>
<b>Western Power Distribution</b>	We can understand the benefit of allowing for some flexibility by having the details in a Panel-owned document rather than the SEC along with making it easier to alter and adapt going forward, however, we do have some concerns that this could lead to some Working Groups being given an advantage over others by giving 'favoured' Modifications preferential requirements. We would seek clarity around the requirements that the Panel will employ should they decide if Terms of Reference are to be changed i.e. would this be taken to a panel vote and if so should this be a unanimous vote?
<b>SSE</b>	We agree with this proposal and support the SEC Panel managing the Terms of Reference to give greater flexibility when it is required.

Question 6: Do you agree with the proposed quoracy arrangements for Working Groups? Do you agree these should be adopted immediately?	
Opus Energy Ltd	Yes. However, although if, for example, only one or two members were to attend, it may be inappropriate to assume that the remaining members have read the paperwork and have nothing further to add.
Scottish and Southern Electricity Networks	SSEN agrees that the quoracy requirements can be used to prevent modification to proceed to their intending conclusion. Immediate application will allow stranded modification to be dealt with appropriately.
E.ON Energy Solutions	We do not understand the rationale for this proposal and we would not endorse such a radical change. Quoracy exists as an Industry standard to ensure that minimum representation from across the Industry have a fair voice in decision-making. This is an essential part of our change process and we feel that the likely result of removing this will be a direct increase in rejected modifications, or recommendations for the rejection of modifications. Consequently, this change would be introducing inefficiency within the Change Process, flouting the General Objectives of the SEC (namely g, the other would depend upon the changes being rejected).
Utilita Energy	Yes, in the short term. However, under question 1 we have set out our ideas of how Modifications which lack industry interest can instead be considered by a standing group rather than the current SEC process which relies on Working Groups being set up for each Modification (and sometimes on the same day) which means they are extremely hard to resource. We would strongly recommend consideration of efforts to move away from this approach.
Electricity North West Limited	Yes we agree we the proposed quoracy arrangements and these should be adopted immediately subject to SEACAS being required to ensure as many members across all party groups as possible are able to attend a meeting.
EDF Energy	<p>We agree that the proposed quoracy arrangements for Working Groups – attending meetings, even by phone, can be time intensive and it should be possible for people to contribute through review of documentation, although attendance at meetings should still be encouraged.</p> <p>It would be useful to understand what if any barriers currently exist that are preventing more people from participating in Working Groups – reducing the quoracy requirements will address the immediate problem but does create the risk that the same small group of parties have a disproportionate ability to contribute to, and therefore influence the outcome of, the Modifications process.</p>
Npower	We agree that it is not necessary for five people to <u>attend</u> a Working Group meeting for it to be deemed quorate, but we do think there should be a requirement that a minimum number of three Working Group members are present, otherwise there could be occasions where just one or two Working Group members turns up and the meeting is still allowed to proceed which we don't think would be acceptable.
Utility Warehouse	Yes, we agree that there should be a minimum representation of 5 working group members but that there shouldn't be a quoracy requirement for the meeting to proceed. Again, we believe that if standing working groups were utilised this would be less of an issue.

<b>DCC</b>	Yes. DCC considers that the SEC does not require quoracy for every meeting of a working group, only for Working Group membership. We consider SECAS would be compliant with the SEC to operate in the proposed way. Additionally, we consider that the increased use of teleconference and electronic means for development of Modification Proposals would allow the Modifications process to run more efficiently.
<b>Western Power Distribution</b>	We agree with the Working Group quoracy remaining the same, but with the added confirmation that Working Group meetings can progress without all members (or the proposer) being present/on the telephone, with these members being contacted via email for input.
<b>SSE</b>	We agree that for the Working Group meetings, the quoracy at a specific session could be relaxed to ensure that discussions can progress. We support maintaining the minimum representation of 5 members for a WG. We agree that the arrangements could be adopted immediately, as long as SECAS continue to reinforce the message of WG representation and attendance.



## Question 7: Do you agree with the proposed changes to the Fast Track process?

<b>Opus Energy Ltd</b>	<p>Yes. Removing unnecessary levels of complexity and aligning processes with those for other industry codes is logical and should improve the efficiency of the change process.</p> <p>We see no issue with parties other than the Panel being permitted to raise fast track changes.</p>
<b>Scottish and Southern Electricity Networks</b>	<p>SSEN agrees that the Fast Track process should be amended to lessen the bureaucratic nature of the SEC.</p>
<b>E.ON Energy Solutions</b>	<p>We do not believe that the proposed changes to the Fast Track process bring any worthwhile benefit, but they do raise concern; as such we are not supportive of this proposal.</p> <p>In a 'business as usual' world, this process may provide some value, but we are nowhere near that point today. With so much change and congestion within the Smart Industry the consequences of the concerns raised by this proposal are felt too great to warrant the change. It would not take much at this scale of stretch across the Industry for a change to be implemented where it should not have been, simply because materiality was not noticed within the single meeting at which a Fast Track modification was approved, or because Parties did not have time within 15 WDs of approval to assess and object to such a modification. In our experience, establishing materiality or more importantly non-materiality, requires time because of the various areas of expertise which may be required in reviewing the proposed changes. The current arrangements allow for this time because of the requirement for two Panel meetings, it is therefore felt that the current arrangements are more robust and secure than are those being proposed.</p>
<b>Utilita Energy</b>	<p>We agree with the concept but as the process hasn't seen much use to date we are unsure that the changes will have much of a benefit on the overall SEC Change Process. We also wonder if the Panel needs to be in control of this process or whether it can be the Change Board under a new process like that which we have detailed under question 1.</p>
<b>Electricity North West Limited</b>	<p>Yes we agree with the proposed changes to the Fast Track process.</p>
<b>EDF Energy</b>	<p>We agree that it would seem sensible to align the Fast Track process to that already in place under other codes.</p>
<b>Npower</b>	<p>We agree that any party should be able to propose a fast track modification, not just the Panel. However, the Panel should retain the power to decide whether or not a modification is treated as fast track. We agree that the process used in the SEC should be aligned with that in other industry codes, governed by CACoP.</p>
<b>Utility Warehouse</b>	<p>Yes, we agree with the proposed changes to the Fast Track process.</p>
<b>DCC</b>	<p>Yes. DCC considers that the elimination of the consultation period under these circumstances is sensible. The criteria for changes suitable to be considered</p>

	<p>through this mechanism is sufficiently robust to minimise the risk of a change detrimental to Parties or constituencies.</p> <p>We would however add that changes of this nature should be highlighted to all Parties and should be accompanied by a plain English explanation of the process, the change and the available means to protest or appeal. All Parties should be provided with sufficient opportunity to assess each Modification Proposal and raise any concerns in advance of the Panel making a decision.</p> <p>It is necessary for SECAS to provide Critical Friend services to not only the proposer, but also to any Party questioning these changes during the period prior to the Panel decision, and within the Appeal window.</p>
Western Power Distribution	Yes we agree with the Fast Track process that has been suggested.
SSE	Yes

**Question 8: Do you have any other areas under Section D that you believe should be further reviewed?**

<b>Opus Energy Ltd</b>	No.
<b>Scottish and Southern Electricity Networks</b>	SSEN believes that once SECMP0046 is finished, SECAS and its members may wish to review then if any more improvement can be made.
<b>E.ON Energy Solutions</b>	-
<b>Utilita Energy</b>	<p>We have reviewed the SEC Change Process using our experiences of raising and progressing SEC modifications in comparison to other code change processes and have put forward an alternative proposal for how the SEC Change Process could work under question 1 of this consultation. We would be happy to talk through our suggestions with SECAS as we believe this is a vital opportunity to take a completely fresh and more efficient approach to change management and issue resolution under the code.</p> <p>We strongly encourage considering mirroring arrangements that work well under other codes to reduce the barriers to change and innovation which we believe exists today.</p>
<b>Electricity North West Limited</b>	<p>Yes. We do not agree with the current voting arrangements under Section D of the SEC during the Report Stage. This consultation has not asked a question on the Report Stage. The current arrangements only allow SEC Parties to express a view on a Modification Proposal and the SEC Change Board Members are not bound by their SEC Party constituents' responses.</p> <p>Our proposed solution under SECMP0041 modification proposal is for each SEC Party to be entitled to a vote on SEC variations; and SEC Change Board members' votes are bound by voting to SEC variations for their Party Category.</p>
<b>EDF Energy</b>	Not at this time – however we note that SECMP0041 is currently in progress which could impact the remit and constitution of the Change Board if it is approved.
<b>Npower</b>	We have no other comments or suggestions to add.
<b>Utility Warehouse</b>	<p>We believe that greater depth and transparency is needed from the DCC when providing their impact assessment on the cost of change to their systems. The cost of changes to DCC systems is being identified as a barrier to change, as the expense involved makes it difficult to justify the benefit vs the cost. However, as an industry we have no visibility of what is responsible for these costs. If there was a greater depth of visibility of the costs DCC incur when providing details of an impact assessment, it would provide a greater understanding when exploring future solutions what aspects of DCC systems are the most costly to change, and allow the industry to consider this when exploring future solutions.</p>
<b>DCC</b>	Yes. DCC considers this to be a good opportunity to examine and debate all issues surrounding governance of the SEC. As with a Significant Code Review, it would be expedient to consider all outstanding governance issues in the

	<p>round. This could include changes in the voting system used in the Change Board as expressed in SECMP004.1. The additional powers proposed for the Change Board would need to review the membership and this would have overlap with voting rights.</p> <p>We consider that the SEC will need to develop and implement processes and procedures for the formulation of DCC system releases. This could include:</p> <ul style="list-style-type: none"> <li>• The mechanism for allocating Modifications to DCC System releases;</li> <li>• A decision-making system for prioritisation of change;</li> <li>• The suitability of the Urgent modification process for all aspects of the SMIP including mass roll out and</li> <li>• A system for governance around acceptance testing failures.</li> </ul> <p>We also believe there is sufficient demand to warrant a review of a User Pays model for the SEC.</p> <p>Furthermore, in the medium term the SEC will need to consider:</p> <ul style="list-style-type: none"> <li>• A mechanism for cross code system alignment;</li> <li>• Interactions with the forthcoming Retail Energy Code;</li> <li>• Interactions with the proposed changes embodied in CGR3; and</li> <li>• Governance for DCC system changes outside of the SEC.</li> </ul>
<b>Western Power Distribution</b>	<p>We agree with this Consultation, however we think an additional modification for addressing exactly how and when the Panel can close a modification, needs to be raised.</p>
<b>SSE</b>	<p>Not at this time however it may be beneficial to review once any amendments have been implemented for a period of time.</p>

Please provide any further comments you may have	
Opus Energy Ltd	-
Scottish and Southern Electricity Networks	<p>It would be good if the panel can monitor and report to DCC Users whether or not the DCC could indeed complete a modification while showing expenditure saving.</p> <p>However, one can play this game by inflating the initial cost and pretend saving were made.</p>
E.ON Energy Solutions	-
Utilita Energy	Our final comments are regarding the critical friend role taken by SECAS regarding Modifications. We believe this service should be a recommended advisory role i.e. suggestions and advise may be given by SECAS however feedback should not lead to delays in Modifications being progressed and Proposers should have the final say in how the Modification is treated.
Electricity North West Limited	<p>Yes. SECAS should have an obligation to notify a Proposer why a modification is being stalled or not being progressed through the refinement process (or development stage as is being proposed) in a timely manner.</p> <p>Our SECMP0041 (a related modification to this Section D review) was published on the 2 August 2017 with a proposed implementation date of March 2018. The first working group meeting took place on the 18 October 2017. It took SECAS another 5 months to schedule the second working group meeting without any explanation for the delay to ENWL as the Proposer. The second working group meeting has been scheduled for the 5 April 2018 nearly 6 months after the first meeting.</p> <p>Clear guidelines should be written to ensure any particular modification or review does not take precedence over another modification without appropriate justification being provided.</p>
EDF Energy	The SEC Modifications as it stands is clearly not working as effectively as it could be, so we welcome this review of the process and are broadly supportive of the changes proposed. More discussion of issues and potential changes prior to Modifications being raised in the proposed Development Process should help to ensure that Modifications that are formally raised will be progressed more quickly, and have more chance of being successfully implemented.
Npower	-
Utility Warehouse	-
DCC	<p>Thank you for the opportunity to comment on these matters. DCC is pleased that a wholesale review of SEC governance is being undertaken. We feel the Code has reached a point of sufficient maturity for assumptions made in the original drafting to require review.</p> <p>We look forward to working with SECAS and all stakeholders to find means to improve the processes and workings of the SEC. DCC is dedicated to providing</p>



	an excellent customer experience and we believe the SEC open governance process is an opportunity to demonstrate this.
<b>Western Power Distribution</b>	We agree with the overall review, however there are still a lot of areas that need further work and development. We also feel that SECMP0041 should still progress as this Section D review does not address the issues that SECMP0041 is addressing.
<b>SSE</b>	We don't have any further comments at this time.

## Response from the Operations Group Sub Committee to the SEC Section D Review Consultation.

At its meeting on Tuesday 27<sup>th</sup> March, the Operations Group (Ops Group) discussed proposals for changing the Self Service Interface (SSI). A principle part of this discussion related to the effectiveness of the change process for the SSI. The Ops Group agreed it would be appropriate to inform the Working Group of these discussions, so that it can consider whether the issues raised are being addressed in the proposed improvements to the modifications process.

Please note that the Ops Group has not considered the proposals in the Section D consultation as a whole.

### Context

At present there are concerns that the SSI as currently implemented is not suitable for operational use. The DCC have come forward with proposed improvements; the DCC have also suggested that an effective way of implementing these would be incrementally (an “agile” approach).

The SSI definition takes the form of a SEC Subsidiary document (the Self Service Interface Design Specification (SEC Appendix AH). It contains a very detailed specification, down to field level.

The discussion was entirely in the context of the SSI. The Ops Group did not consider whether any analogous situations might occur elsewhere in relation to other topics.

### Issues

Concerns were raised over whether the Mods process (as currently defined and executed)

1. Was suitable for quickly dealing with very detailed changes to a technical specification, best achieved by continual interaction between DCC and Users. Individual proposed changes might be small, but with apparently obvious benefits to Users
2. Would be able to facilitate an incremental approach as suggested by the DCC. It was felt that the most likely outcome under the current arrangements would be the batching of many small proposed changes into a single modification which then would then follow a lengthy path through the modification process. In theory the existing Modification Process could be shortened such that the Panel may determine that the change could go straight to report consultation, in instances where the proposal is fully costed.

### Points Raised

1. A way of quickly and efficiently assessing, approving and executing changes to the SSI is required.
2. Any changed governance of the change process for the SSI should still give appropriate control and visibility under the SEC to SEC Parties.
3. It was noted that adopting new governance for changes to the SSI risked establishing an alternative change process, operating in parallel to the mods process. This would be avoided

if the Modification Process could be changed to include provision for rapidly assessing and approving detailed specification changes.

4. The question was also raised as to whether it was appropriate for the detailed SSI technical specification to be a Code Subsidiary document and hence part of the SEC, or whether the SEC should rather include a high-level statement of requirements, and refer out to the more detailed specification.
5. The agile approach proposed by the DCC should be considered (and, for example, whether this would be applied to both development and deployment), whilst noting that this would be a new approach under the SEC.
6. It should also be noted that an Ops Group Member advised that there had been no opportunity for Users to trial the SSI before it was completed and deployed for Live Operations. A lesson learnt is that such a step would have been a valuable part of the process.

The Ops Group hopes the above comments will assist the Working Group in its considerations of change processes under the SEC.