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Action:	**For Decision**

Release Management: Enduring Responsibilities of the SEC Panel

1. Purpose

This paper identifies what are expected to be the principal enduring responsibilities of the SEC Panel in overseeing, on behalf of SEC Parties, the implementation of SEC Releases. These responsibilities will, in essence, be in place of those currently carried out by BEIS: they will need to be fulfilled for Release 4.0 and succeeding Releases.

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It is anticipated that changes to the SEC will be necessary to confirm the Panel's authority for the identified responsibilities.

The paper asks that the Panel notes and agrees the identified responsibilities and indicates whether it is prepared to support changes to the SEC being made, and to select their preferred means of initiating these changes.

2. Assumptions and Scope

The starting assumption for this paper is that the SEC Panel will have an enduring responsibility to oversee, on behalf of SEC Parties, the implementation of SEC Releases. In this paper, a "SEC Release" or, simply, "Release", means the implementation of changes to put into effect one or more SEC Modifications. This term is used to distinguish such Releases from other releases that DCC may carry out for its own purposes.

DCC, as the licensee, are responsible for making the necessary changes to DCC services and systems for a Release: the Panel is not (and will not be) responsible for the management and execution of these activities.

A SEC Release encompasses the changes resulting from one or more modifications to the SEC. In some cases, such an implementation may be carried out concurrently with other changes to DCC systems, initiated by the DCC. There may be interdependencies between these concurrent changes that the Panel will need to take account of.

This paper addresses the nature of the SEC Panel responsibilities envisaged, and how these might be incorporated into the SEC. The paper does not address how these responsibilities would be carried out: the appropriate processes would be defined subsequently.

This paper specifically concerns the oversight of SEC Releases, and does not address any other aspects of the enduring operation of the SEC.

3. Prior Discussions

The principles set out here have been discussed with BEIS and Ofgem, and the paper takes account of their views. BEIS and Ofgem have not been asked to review the final version of this paper prior to publication.

4. Context

To date in the SMIP, BEIS has overseen the development activities being carried out by DCC. This has included, for instance, agreeing the technical content of Releases including defect fixes, the review of plans and monitoring of progress against those plans. BEIS has also carried out extensive stewardship activities with DCC, with the intention of smoothing the path to full scale live operation of DCC Services. This has involved extensive engagement with and assistance to DCC at a working level.

These activities are enabled by the statutory powers of BEIS.

It is understood that BEIS will now transition out of these activities, with the expectation being that a subset of them will be transferred to the SEC Panel. This will be done in time for the Panel to oversee Release 4.0.

At present, the SEC does not include the oversight of Release Management by the SEC Panel: DCC have the responsibility for managing a Release.

Ofgem are responsible for regulating DCC in accordance with DCC's licence. This will include Ofgem determining what costs are recoverable by DCC. It is understood that Ofgem will look to the SEC Panel for a view on Release implementation costs.

5. Enduring Panel Responsibilities

5.1 General Approach

It is assumed that there will be an enduring need for oversight of the implementation of Releases on behalf of SEC Parties, who are the ultimate customers for DCC Services: this oversight would be the responsibility of the SEC Panel.

It is proposed that, in accord with general programme management principles, this oversight should encompass, at the appropriate level of detail, consideration of:

- Scope (reflecting approved modifications and taking account of costs and benefits)
- Time (that is schedule)
- Quality (that is, achievement of defined requirements in accordance with defined standards)
- Cost

Duties related to the above would continue throughout the lifecycle of a Release, that is encompassing planning, progress review against plan, go-live, and post go-live review.

Note that it is not proposed that the SEC Panel take over the stewardship roles of BEIS which comprise detailed assistance to DCC. These activities would fall away as they are discontinued by BEIS. Close working relationships would be retained to facilitate understanding of plans, progress, and assurance activities. This would seem consistent with DCC's status as an established, responsible licensee.

5.2 Specific Responsibilities

It is envisaged that the SEC Panel's responsibilities for overseeing Releases would encompass the following specific aspects.

a. Release Management Policy

The SEC Panel is already fulfilling the provisions in the SEC relating to Release Management Policy.

b. Release Formulation and Requirements

The SEC Panel is already fulfilling the provisions in the SEC relating to individual Modifications. However, the essence of release management is that a Release should be considered as a whole. Therefore, the SEC Panel should approve requirements for a Release as a whole, including its design, content and timeline. The timeline should identify the main phases of the lifecycle of a Release.

Further, proposed changes to DCC infrastructure will be reviewed and endorsed by Panel subcommittees (TABASC, SSC, OPSG as appropriate). However, approval will be by DCC

It will be important to consider the end to end implications of a Release, for example, in regard to the implications for User systems, and, as necessary, other industry implications.

c. Design and Implementation Strategy

This includes consideration of design options, sourcing options, and testing strategy and approach. This strategy needs to encompass all parties involved, including Users and providers.

The SEC Panel, through the SSC and TABASC (with input from the OPSG as appropriate) will review and, as appropriate, endorse proposed design solutions.

DCC will identify proposed sourcing options, and seek endorsement from the SEC Panel. It is anticipated that the final decision on sourcing will rest with DCC as licensee.

Design of an integrated testing approach for a whole Release is likely to be an important and significant activity. It is likely to include assessment of risk, and consequent impacts on costs and benefits

d. Cost/benefits Review and Challenge

The consideration of costs and benefits in the modification process will remain.

However, the expectation is that the SEC Panel will also play a role in considering and, as necessary, challenging costs and benefits of a Release as a whole (Currently, the modification process only addresses costs for an individual modification to the end of SIT: consideration of total release costs through to go-live is necessary).

This would be consistent with Ofgem expectations; it is understood that some SEC Parties also believe this to be a valuable role.

For changes to DCC infrastructure**,** the question is to what extent the SEC Panel takes a larger role, replacing BEIS activities. The assumption is that Parties will want the SEC Panel to take on a greater role in reviewing and challenging DCC costs and providing a view to Ofgem for consideration in their approval processes.

e. Implementation Planning

It is expected that the SEC Panel will take an increased role in planning a Release. This will include approving the content of the Release and approving the implementation and test plan to be produced by DCC.

The implementation plan should encompass development, testing methodology, deployment to live and production proving.

f. Implementation Monitoring - Schedule

It is expected that the SEC Panel will monitor against plan the progress of the implementation of the Release with active involvement in the run up to Live.

This monitoring will include overseeing the management of implementation risks and issues.

g. Implementation Monitoring -Quality

It is assumed that the SEC Panel will take on the responsibility for reviewing the quality of formal documents provided as deliverables.

h. Implementation Monitoring – Costs

The SEC Panel would also monitor and review deviations of actual costs from planned for a Release. This assumes, that the Panel does take on some broader responsibility for overseeing costs of a Release.

i. Implementation Assurance

The SEC Panel should set the requirements for assurance that the Release is ready for deployment to live and should review achievement of these requirements as development progresses.

Such requirements will have a number of components. So, for example, it would include approval of the test strategy and ensuring that the level of risk associated with any particular approach had been properly assessed and explained.

The SEC Panel would also be responsible for ensuring that an appropriate level of independent assurance is obtained. For example, this might include the appointment of an independent implementation auditor. This auditor would work according to terms of reference set by the SEC Panel. (Note that under the SEC, the SSC already has opportunity to require independent assessments relating to security compliance).

j. Change Management

The SEC Panel should define and oversee the change management process for the Release (that is, the process by which changes to the scope, schedule, costs of the Release, made subsequent to their approval, are authorised and implemented). It is important that the SEC Panel has early visibility of proposed material changes in scope, cost, or implementation schedule. It would be expected that the SEC Panel would have the authority to endorse or reject such proposals.

k. Management of Release

The SEC Panel will oversee and monitor progress towards readiness for release deployment. The context for this will be the Release Management Policy and the Implementation Plan.

Readiness reporting and monitoring would be a continuing activity throughout the implementation lifecycle, and would encompass all involved parties, not just DCC.

l. Go-live Decision Making

The SEC Panel will be responsible for determining that the Release should go-live. This will involve the Panel being comfortable that

- the development of the Release has been completed satisfactorily (including systems, processes, data, availability and training of staff). Any known defects should have been properly risk assessed, and appropriate work arounds proven and approved.
- adequate testing/proving has been successfully carried out
- the transition process for the Release has been defined and adequately rehearsed (or otherwise proven)
- that DCC is ready to operate the new Release in live circumstances
- Users are ready
- The status of the DCC services (prior to the deployment of the new Release) is satisfactory
- A contingency plan is defined (and has been adequately proven) to address the circumstance where the deployment to live fails or causes serious problems. The process for invoking this plan should be defined.

The SEC Panel should set out the process by which the Go-live decision shall be reached, and the information required at each step. In this decision-making process the SEC Panel will need to consider the reported status of the DCC work and also independent assurance reports.

m. Post Go-live Monitoring and Review

The Panel will be responsible for two distinct phases of post go-live review, as below

- Monitoring and review of initial period of live operation. The primary purpose here is obtain assurance that the Release has been successfully put into live operation, without any major difficulties
- Release Review. This would be the equivalent of a project implementation review. Its purpose would be to ascertain how well the implementation of the Release had achieved its objectives, and the identification of lessons learnt. This would include a review of actual against planned costs and benefits.

6. SEC Provisions

An initial consideration of the SEC suggests that the responsibilities outlined in Section 5.2 are not currently fully supported by the SEC. For example, while the SEC has provisions relating to Release Management Policy and to handling modifications, it does not explicitly address most of the matters concerned with the management of a Release as a whole. Similarly, the SEC does not provide for the consideration of costs and benefits of a Release as a whole by the SEC Panel.

Consequently, the current view is that a change to the SEC would be required to include the responsibilities identified in Section 5 as part of the SEC Panel's duties. Such a change could be achieved in one of the following ways:

a. BEIS could use their statutory powers to direct a change to the SEC.

This route would be likely to deliver the quickest solution and allow the Regulatory Authorities to recognise these activities as being justified and that they should continue. A letter to the SRO from the Panel could be the means of formally initiating this.

b. A SEC Party could raise a modification.

   This route would require a SEC Party to take up this matter and initiate a modification proposal. Once raised, it would be subject to the normal processes and timescales for consideration of a modification.

c. The SEC Panel could raise a modification, as provided for in Section D1.3(e) of the SEC, following a written request by the Authority (C2.3(i)) and the publication of a report by the Panel. It should be noted that this would require a unanimous vote of the Panel. The Recommendations in Section 7 of this paper are structured to explore whether the SEC Panel would support this route unanimously. Clearly this route involves the SEC Panel proposing a change to the scope of its own responsibilities.

7. Recommendations

The Panel is requested to:

- **NOTE** the contents of this paper;
- **AGREE** that responsibilities identified in the paper (Section 5.2) should be included in the Panel's duties, subject to detailed consideration in the process of changing the SEC (either by Modification or by Direction);
- INDICATE its view of the preferred route for making the necessary changes to the SEC, choosing from
  - By Direction from BEIS using its statutory powers
  - By a SEC Party raising a Modification
  - By the SEC Panel raising a Modification in accordance with SEC D1.3e(i)
- **AGREE** that, in the event that the SEC Panel were to raise a Modification, it would support the initiation of a Modification in accordance with SEC D1.3e (i).

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SECAS Team

6th July 2018