Smart Energy Code

SEC
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Stage 02: Working Group Consultation Responses

What stage is this document in the process?

- 01 Initial Modification Report
- 02 Refinement Process
- 03 Report Phase
- 04 Final Modification Report

SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'

About this document

This document contains the collated responses to the SECMP0029 Working Group Consultation (WGC). The Working Group (WG) will review these responses and consider them as part of the solution development for 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.

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Gemserv

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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	No	The solution doesn't look as though it will actually address the problem that has been described. The proposer is suggesting that the issue is that DCC are under no obligation to store any SRs they receive during BCDR testing, and then forward them to the intended smart meters once the BCDR event is over. This proposed SEC change would just require DCC to tell DCC Users when they are about to perform BCDR testing. That could then allow Suppliers to tell their customers not to top up during that outage period. However, the Smart solution does allow for pre-payment top ups to be applied locally if there is no WAN signal so the customer would not lose their credit. This makes it difficult to see what the benefit of this change really is.
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN agree with the working group that General SEC Objective (a) is facilitated by this proposed modification.
Utilita Energy	Large Supplier	Yes	We support the view of the Working Group that SECMP0029 will better facilitate SEC Objective a through introducing DCC

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			obligations that will help reduce service disruption for DCC Users and consequential customer impacts.
Electricity North West Limited	Network Party	Yes	Yes, we agree that SECMP0029 better facilitates SEC Objective (c) by allowing Electricity Network Operators to prepare for the outages and manage efficiently.
Citizens Advice	Consumer Rep.	Yes	Yes. This change will ensure the operation of smart metering systems is efficient and coordinated across industry, fulfilling the first general objective. It will also protect consumer driven service requests during BCDR testing, simplifying the process to consumer benefit.
E.ON Energy Solutions	Large Supplier	Yes	We believe this better facilitates objectives a) and c) because the installation and operation of SMART metering systems will depend significantly upon DCC systems being available, and users being notified of any planned downtime with as much lead time as possible to minimise disruption and re-planning activities.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We agree with the Working Group that ECMP0029 better facilitates SEC Objectives (a) and (c).
EDF Energy	Large Supplier	Yes	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. 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

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			Users, and therefore on their customers, can be better managed. However this is only the case if the consultation is meaningful and takes User feedback on board to find an outcome that has a consensus behind it.
Western Power Distribution	Network Party	Yes	I believe that this modification better facilitates SEC Objective (a) as it will help to facilitate the efficient operation of Smart Metering Systems. I believe that this modification also better facilitates SEC Objective (c) by providing information so Energy Consumers can manage their use of gas and electricity.

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Question 2

Q2: Will your organisation be impacted due the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	Yes	Yes. On the one hand, our organisation would be positively impacted by the implementation of this change as it will ensure we are provided with at least 60 WDs notice of any BCDR Test activity which will enable us to plan accordingly and issue communications in a timely manner. However, we do not support this change and think that it should not be implemented. This is because our solution is built to be able to cope with failure for our Service Requests to reach DCC (which would happen in a BCDR event), as such the solution detailed in this change is not needed by us.
Scottish and Southern Electricity Networks	Network Party	Yes	SSEN will be able to plan for any such event. This will minimize the administrative burden that lost service requests would trigger.
Utilita Energy	Large Supplier	Yes	Yes, a User of the DCC Service we will be impacted however we believe this Modification only brings benefits to current DCC Business Continuity and Disaster Recovery practices.
Electricity North West Limited	Network Party	Yes	Yes our organisation will be impacted. The main impact of a BCDR testing on us as an Electricity Network Operator would

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			be that we will not receive Power Outage alerts or be able to Read Supply Status whilst the DCC system is down.
Citizens Advice	Consumer Rep.	No	No
E.ON Energy Solutions	Large Supplier	No	N/A
Scottish Power Energy Retail Ltd.	Large Supplier	No	Any impacts as a result of the implementation of SECMP0029 are expected to be favourable.
EDF Energy	Large Supplier	Yes	The increased notice period will support our forward planning for system downtime and help manage the customer impacts of this.
Western Power Distribution	Network Party	Yes	If this modification is approved we will have to implement internal processes for when the DCC systems are taken down. We will need to manage Service Requests and also have a process to manage the fact that we will not be receiving Alerts (specifically Power Outage Alerts) during any outage time. We will also need processes to manage the potential of RDP files failing depending on the times of the outages.

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Question 3

Q3: Will your organisation incur any costs due to the implementation of this modification?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	Yes	This change looks like a small admin cost at first, but if DCC are required to make changes to their solution to be able to store and subsequently send SRs, that could be significantly more expensive with minimal benefit to Suppliers or customers and should therefore be avoided.
Scottish and Southern Electricity Networks	Network Party	No	N/A
Utilita Energy	Large Supplier	No	N/A
Electricity North West Limited	Network Party	No	N/A
Citizens Advice	Consumer Rep.	No	No, however the cost of this change is likely to be borne through consumer bills.
E.ON Energy Solutions	Large Supplier	No	The implementation of this modification should ensure unnecessary costs are avoided, as outlined in the answer to question one above.
Scottish Power Energy Retail Ltd.	Large Supplier	No	N/A

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EDF Energy	Large Supplier	No	We have not identified any costs that we would incur as a result of the implementation of this modification.
Western Power Distribution	Network Party	No	We will not require any system changes, just changes to our internal processes.

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Question 4

Q4: Having considered the potential impacts and costs to your organisation, as well as the cost to deliver the modification, do you agreed that SECMP0029 should be approved?

Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	No	As Suppliers, we have a duty to our customers to manage our solutions and meters properly, including commands. We should already be tracking the responses and outcomes of commands we send – rather than sending them out and just hoping for the best. Npower already has this in design and have implemented it at cost, so therefore we do not support the implementation of SECMP0029.
Scottish and Southern Electricity Networks	Network Party	Yes	All costs associated with this change are insignificant and the change should therefore be supported.
Utilita Energy	Large Supplier	Yes	We believe the Modification will only lead to improvements for SEC Parties and strongly support its approval.
Electricity North West Limited	Network Party	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.
Citizens Advice	Consumer Rep.	Yes	Yes, this change will protect consumers, if they top up during BCDR testing. The loss of these service request could result in high detriment, especially if consumers are left off supply. It may also be confusing customer experience if they need to top up again, despite believing they have already done so. The

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			change simplifies the process somewhat and reduces the risk of negative outcomes.
E.ON Energy Solutions	Large Supplier	Yes	N/A
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We would support the approval and early implementation of SECMP0029
EDF Energy	Large Supplier	Yes	While we agree that SECMP0029 should be approved it is not yet clear what the 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 negates the benefits of having this period in effect.
Western Power Distribution	Network Party	Yes	I believe that SECMP0029 should be approved as it provides more notice for any outages and therefore will allow us to be better prepared.

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Question 5

Q5: Do you believe that the draft legal text changes deliver the intention of the modification?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	No	• Attachment A Section 4 – This section states that there are no impacts upon SEC Parties, however it then states that it is proposed that SEC Parties should be consulted (regarding proposed BCDR activity I assume) and be notified regarding proposed BCDR activity, both of which are impacts (although positive ones which we support) upon SEC Parties. Also, it is noted that the proposal will also have an impact on the DCC as they will need to implement the proposals within their system/process. However the way the document is drafted implies that the DCC are not a SEC Party, which they are so this should be addressed. • Attachment B – proposed new definition of "Business Continuity and Disaster Recovery Test Procedure" – the proposed new definition is "means a document created by the DCC setting out its procedure for undertaking the Business Continuity and Disaster Recovery Tests". We believe this should be "Test" rather than "Tests" as the other proposed new definition is in the singular not the plural (Business Continuity and Disaster Recovery Test) and it therefore considers the BCDR Test to be one event rather than multiple testing events. This also applies to Attachment B – Header to Clause H10.11 which should be amended to read "Business Continuity and Disaster Recovery Testing" rather than "Business Continuity and Disaster Recovery Tests" for the same reasons. Again,

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			within Attachment B – Drafting of Clause H10.12A – this clause again uses both "Test" and "Tests". We think that further clarity is needed in the drafting with regards to whether or not BCDR is to be considered one Test or a series of Tests. • Attachment B – Drafting of Clause H10.12A – as currently drafted this clause will require the DCC to consult with SEC Parties regarding the BCDR Test Procedure on an annual basis (and for this consultation to be carried out more than 60WDs prior to when the DCC are planning to conduct their BCDR Activity). Whilst consulting with parties is a good idea, is an annual consultation on the BCDR Procedure itself what was intended? Or alternatively, was it intended that the DCC would consult with Parties each year regarding their plans regarding that year's BCDR activity in advance of issuing a notification to parties regarding the activity? Further clarification on this is required. • Attachment B – Drafting of Clause H10.12B – we fully support the inclusion of this clause which would oblige the DCC to provide us with at least 60WD notice.
Scottish and Southern Electricity Networks	Network Party	Yes	N/A
Utilita Energy	Large Supplier	Yes	Yes, we are in strong support of this Modification to place well needed obligations on to the DCC to consult with and notify SEC parties before carrying out future Business Continuity and Disaster Recovery Tests.
Electricity North West Limited	Network Party	Yes	Yes we agree that the proposed legal text (Attachment A) for SECMP0029 delivers the intention of SECMP0029.

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Citizens Advice	Consumer Rep.	N/A	Neutral
E.ON Energy Solutions	Large Supplier	Yes	N/A
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	N/A
EDF Energy	Large Supplier	Yes	We believe that the draft legal text changes deliver the intention of the modification
Western Power Distribution	Network Party	Yes	N/A

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Question 6

Q6: Do you agree with the recommended implementation date?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	N/A	We cannot answer this question. There appears to be some inconsistency of the proposed implementation date so clarification on this is needed before we can confirm whether or not we agree with the recommended implementation date.
Scottish and Southern Electricity Networks	Network Party	Yes	N/A
Utilita Energy	Large Supplier	Yes	Yes, although we would support an implementation date as soon as reasonably practice.
Electricity North West Limited	Network Party	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 October 2018.
Citizens Advice	Consumer Rep.	N/A	Neutral
E.ON Energy Solutions	Large Supplier	Yes	E.ON would prefer the earlier date of 28th June 2018 to ensure that any BCDR testing performed in the second half of 2018 will comply with the arrangements of this Modification. For the majority of DCC Users activity in the second half of 2018 is likely to be significant, appropriate lead time of system

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			outages will therefore be imperative to minimise business impacts.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We would like to see SECMP0029 implemented at the earliest opportunity
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date.
Western Power Distribution	Network Party	Yes	N/A

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Question 7

QX: Do you have any further comments on SECMP0029?			
Party Name	Party Category	Yes/No	Comments
nPower	Large Supplier	Yes	Within the consultation covering letter it states that the WG recommends an implementation date of 30/09/18 (alongside R2.0) if a decision is made to approve by 14/09/18. Within Attachment A however it states that the WG recommends an implementation date of 28/06/18 (if a decision is made to approve by 11/06/18) or 01/11/18 (if a decision is made to approve after 11/06/18 but before 15/10/18. There appears to be some inconsistency of the proposed implementation date so clarification on this is needed.
Scottish and Southern Electricity Networks	Electricity Networks	No	N/A
Utilita Energy	Large Supplier	N/A	N/A
Electricity North West Limited	Electricity Networks	No	No we have no further comments.
Citizens Advice	Consumer Rep.	N/A	Neutral

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E.ON Energy Solutions	Large Supplier	Yes	We believe that the title for H10.11 should read "Business Continuity and Disaster Recovery Testing" opposed to "Business Continuity and Disaster Recovery Tests"
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	We note from the minutes of the second Work Group meeting that: *"Four systems will be tested (1 DSP, 2 CSPs and SMKI), either at the same time or separately. If the testing occurs separately, the outage time will be 32 hours in total."* We think it important that the DCC commits to test these four systems simultaneously, wherever possible, in order to reduce the periods of any outage.
EDF Energy	Large Supplier	Yes	Given the scope of the changes proposed following refinement of the change it is not clear that this should still be a Path 2 modification and require determination by the Authority.
Western Power Distribution	Network Party	Yes	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. 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 codify more of the detail around how future BCDR tests will be carried out on an enduring basis. Although I agree with this modification I am concerned by the amount of outage time that may be required to carry out this testing.

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