Smart Energy Code

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Stage 04: Modification Report Consultation Responses

What stage is this document in the process?

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

SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'

About this document

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

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

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SECMP0029

Modification Report Consultation Responses

17th April 2018

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About this Document

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

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

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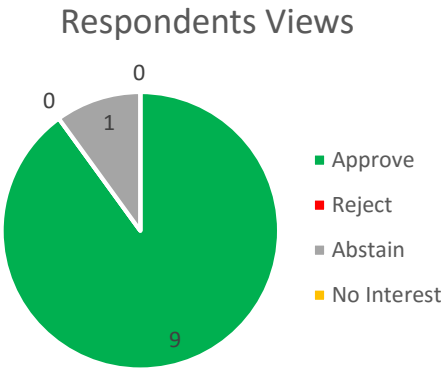
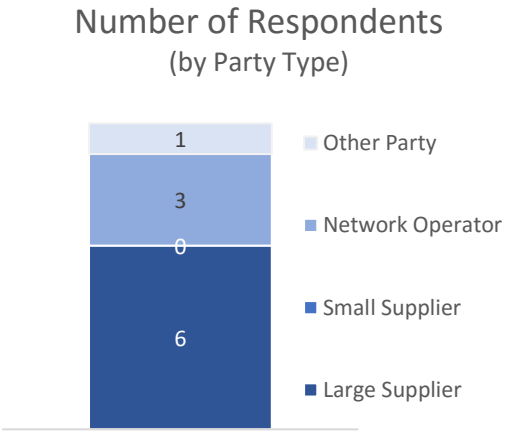
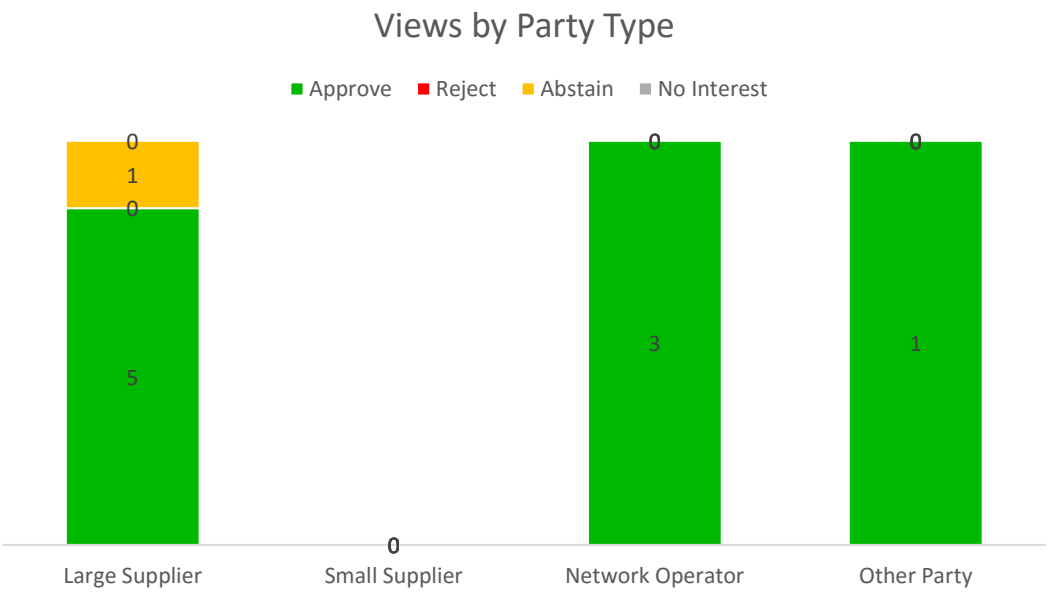
Summary of Responses

This section summarises the responses received to the SECMP0029 MRC.







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Question 1

Q1: Do you agree that the proposed solution better facilitates the SEC Objectives and should therefore be approved?			
Party Name	Party Category	Yes/No/ Neutral	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN believe with the proposed better facilitates the General SEC Objective (a) and should be approved.
E.ON	Large Supplier	Neutral	We believe that where DCC Users are notified 60WDs in advance of BCDR activities they may be able to secure better facilitation of the operations of Smart Metering Systems (SMSs) during the associated outages, and this modification may therefore support Objective a). We further believe that where Suppliers use the SMS to communicate information pertaining to the outage to consumers, this Modification will better facilitate Objective c).
Utilita Energy	Large Supplier	Yes	As the proposer of this modification we strongly maintain that SECMP0029 better facilitates SEC objective (a) and (c) through introducing DCC obligations that will help reduce service disruption for DCC Users and consequential customer impacts
Western Power Distribution	Network Operator	Yes	We believe that this modification better facilitates SEC Objective (a) as it will help to facilitate the efficient operation of Smart Metering Systems. We also believe that this modification better

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			facilitates SEC Objective (c) by providing information so Energy Consumers can manage their use of gas and electricity.
Electricity North West Limited	Network Operator	Yes	Yes, we agree that SECMP0029 better facilitates SEC Objective
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	In our view, it is clear that SECMP0029 better facilitates SEC Objective A in that it will achieve the efficient operation of SMS. We also believe SECMP0029 better facilitates SEC Objective B in that it will enable the DCC to efficiently discharge its obligation to perform BCDR tests. We further think that SECMP0029 might be said to better facilitate the transparent implementation of the SEC, given that BCDR is a feature of the Code.
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 Users, and therefore on their customers, can be better managed.

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

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Question 2

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

Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	SSEN will be able to plan for any such event. This will minimize the administrative burden that lost service requests would trigger.
E.ON	Large Supplier	Neutral	Since descoping the requirement to cache Service Requests (SRs) sent during BCDR the Modification no longer reflects a solution to the issue identified in its entirety. The residual requirements for a consultation and a 60 WDs notification period prior to BCDR activity, should enable Suppliers to set their consumers expectations in such a manner as they do not generate SRs during these outages to avoid SR loss. However the value of this is limited currently because neither the Modification nor the legal text necessitate that the consultation be completed prior to the notification being sent, only that the consultation commences prior to the notification. In order for the 60WDs (and consequently this modification) to provide any value, it is necessary that there are no changes experienced once the 60WD notification has been set. Consequently we believe that the Modification should require the consultation to be completed prior to the notification being issued, and that the BCDR date cannot be subject to change resulting from pipeline reviews or the implementation of Modifications. Furthermore, the solution does not cater for CoS-related SRs. Historic BCDR outages have extended midnight and where this occurs post implementation of this Modification, these SRs will

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			not have been actioned and neither will Suppliers have received a failure notice. The failure of CoS events undermines the value of this modification in our opinion, especially if the automated notifications (Switch Secured Notifications) being reviewed under the Switching Programme are to be implemented. If the DCC consultation requests a delay to the start period of this outage to avoid RDP data processing complications this issue will likely be exacerbated. We are therefore neutral to the implementation of this Modification because whilst the costs of implementation are minimal, the value of this Modification is questionable.
Utilita Energy	Large Supplier	Yes	*We strongly believe this modification should be approved. This modification puts in place new requirements on the DCC in relation to BCDR testing which will enable more sufficient supplier planning to avoid avoidable customer disruption when the DCC system has a planned outage.*
Western Power Distribution	Network Operator	Yes	We believe SECMP0029 should be approved. The costs are minimal and it will ensure we are provided with notice of the outages so we can put internal processes in place to accommodate this.
Electricity North West Limited	Network Operator	Yes	Yes, we support SECMP0029 being approved. Although there is no direct mitigation we can put in place for these events - being given notice by the DCC will at least make us aware in advance of the forthcoming BCDR testing. We also would also reasonably expect the DCC as a competent service provider to already be ensuring that there is no data loss during a DR exercise. The proposed amendments make this an explicit obligation on DCC

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Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	While we agree that SECMP0029 should be approved it is not yet clear what the quantifiable benefits that will be achieved will be. This will be dependent on what happen in any consultation period and the extent to which User input is accounted for in any final BCDR Test Plan. It is also not clear whether the new 60 day notice period is appropriate – and whether reactive changes need to be made within this period that effectively negate the benefits of having this period in effect.
nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	We stand by our comments provided in the Working Group Consultation that the implementation of this change will ensure oversight by DCC of potential impact to end consumes, and that as there are no costs or impacts to our organisation resulting from this modification we are fully in support of this improvement being made.

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Question 3

Q3: Do you agreed that draft legal text changes deliver the intention of the modification?			
Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	
E.ON	Large Supplier	Yes	We believe that the legal text reflects the solution arrived at by the Working Group, however we feel that said solution does not address the points noted above. We have the following comments regarding the proposed text: H10.11 – We believe that the title of this section should read 'test' opposed to 'tests' H10.12A – We believe that this clause ought to be updated to reflect that the consultation must be complete prior to BCDR notification as above H10.12B – We believe that the sentence in brackets ought to be removed: it appears to undermine the intent of this modification, and with BCDR being an annual requirement we can fathom no justifiable reason as to why 60 WDs notice could not be provided. – Especially in light of the capacity model being drawn up by the DCC.
Utilita Energy	Large Supplier	Yes	Yes, we support the proposed drafting and believe it supports the Working Groups preferred solution.

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Western Power Distribution	Network Operator	Yes	
Electricity North West Limited	Network Operator	Yes	Yes we agree that the proposed legal text (Attachment B) for SECMP0029 delivers the intention of SECMP0029.
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We have not identified any issues with the legal text.
nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	

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Question 4

Q4: Do you agree with recommended implementation date?			
Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	Yes	
E.ON	Large Supplier	No	We believe that should this modification be approved, it be implemented only after the proposed DCC consultation has completed. This is simply to ensure that costs are not duplicated in updating SEC Section H, if the DCC consultation results in consequential changes to SEC Section H. We do not believe such a delay would have a negative impact because under the Release Management Policy there will be three Releases a year for SEC-impacting Modifications, and it is therefore plausible that this Modification can still be implemented in time to apply to the BCDR activities undertaken in 2019. However if the 2018 BCDR is scheduled for either post June or post November 2018 and this Modification were implemented in the relevant Release, then we acknowledge this modification will not apply to BCDR activities during 2018 as a result of any such delay.
Utilita Energy	Large Supplier	Yes	We believe this modification should be implemented as soon as reasonable practical.

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Western Power Distribution	Network Operator	Yes	An early implementation date will ensure SEC parties are given notice of any testing to be carried out in the second half of 2018. This will be particularly useful as the rollout ramps up.
Electricity North West Limited	Network Operator	Yes	Yes we agree with the recommended implementation date of 28th June 2018, if a decision to approve is made by 11th June 2018; or 1st November 2018, if a decision to approve is made after 11th June but by 15th
Scottish Power Energy Retail Ltd.	Large Supplier	Yes	
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date.
nPower	Large Supplier	Yes	No comments to add
TMA	Other SEC Parties	Yes	XXXX
SSE	Large Supplier	Yes	

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Question 5

Q5: Do you have any further comments on SECMP0029?			
Party Name	Party Category	Yes/No	Comments
Scottish and Southern Electricity Networks	Network Operator	No	
E.ON	Large Supplier	Yes	The Final Modification Report states that the WG unanimously supports the implementation of this Modification, we believe that this ought to state that 'the majority of the WG support', given the comments made by one respondent.
Utilita Energy	Large Supplier	No	
Western Power Distribution	Network Operator	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 provide more of the detail around how future BCDR tests will be carried out on an enduring basis.

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			Although we agree with this modification, we are concerned by the amount of outage time that may be required to carry out this testing, due to the fact that we would not receive any power outage alerts during this time, and await further communication from the DCC.
Electricity North West Limited	Network Operator	No	No, we have no further comments.
Scottish Power Energy Retail Ltd.	Large Supplier	No	
EDF Energy	Large Supplier	No	
nPower	Large Supplier	No	No comments to add
TMA	Other SEC Parties	No	XXXX
SSE	Large Supplier	No	

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