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Stage 02: Draft Modification Report

SECMP0039:

Communication Hub returns notification mechanism for Other SEC Parties

What stage is this document in the process?

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

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Summary

This modification seeks to allow all SEC Parties who order Communication Hubs (CHs) a mechanism to notify the DCC of fault or no fault returns and receive appropriate responses. The Proposer believes that this will enable all ordering parties to execute a complete ordering and returns process.

Working Group View



- The Working Group **by majority** believes that SECMP0039 should be approved.

Impacts



- Data and Communications Company (DCC);
- DCC User Interface Specification (DUIS); and
- Other SEC Parties

SECMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 1 of 15

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classified as **White**

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Content

1. Summary	3
2. What is the issue?	5
3. Proposed Solution	6
4. Alternative Solution	Error! Bookmark not defined.
5. Impacts	7
6. Costs	9
7. Implementation	10
8. Working Group Discussions	11
9. Working Group's Views	13
10. Recommendations	Error! Bookmark not defined.
Appendix 1: Glossary	15

About this Document

This document is a Draft Modification Report (DMR). This document provides detailed information on the issue, solution(s), impacts, costs and Working Group discussions and conclusion on SECMP0039.

The Smart Energy Code (SEC) Panel will consider this report to ensure that due process has been followed and determine whether to issue the modification for Modification Report Consultation (MRC).

SECMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 2 of 15

This document is
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1. Summary

What is the issue?

The SEC allows any SEC Party to place orders for CHs (SEC Section F5). Between the CH delivery acceptance and installation at a premise, the SEC Party that placed the order requires a mechanism to notify DCC in the event of needing to return the CH. This can be done by submitting the corresponding DCC User Interface Specification (DUIS) Service Requests.

Currently, these service requests are only available to Energy Suppliers¹. Access to a notification and response mechanism will allow any ordering party to return orders on behalf of a number of Energy Suppliers. This will enable consistent supply of CHs to help smooth out peaks and troughs of demand for each individual Energy Supplier.

What is the Proposed Solution?

The Proposer proposes to extend the Eligible User Roles for DUIS Service Requests 8.14.3 and 8.14.4 to include Registered Supplier Agents (RSA).

The Proposer also suggests that, in addition to a mechanism for notifying the DCC, the ordering Party should be provided with a response to acknowledge the acceptance or failure of the notification.

Impacts – Proposed Solution

Party

Large Supplier Parties		Small Supplier Parties	
Electricity Network Parties		Gas Network Parties	
Other SEC Parties	X		

System

DCC Systems	X	Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

¹ Import Supplier or Gas Supplier



Implementation Costs

The total estimated implementation cost to deliver SECMP0039 is approximately £501,200. This total cost consists of:

- **£1,200** in SEC Administration effort; and
- **£500,000** in DCC effort.

Implementation Date

The Working Group recommends an implementation date of:

- **25th June 2020**, if a decision to approve is made by 25th June 2019; or
- **5th November 2020**, if a decision to approved is made after 25th June 2019 but on or before 5th November 2019.

Working Group's views

The Working Group believes **by majority** that SECMP0039 does better facilitate the SEC Objectives, and therefore believes that this Modification Proposal should be **approved**.



2. What is the issue?

Background

The SEC currently allows any SEC Party to place orders for CHs, in accordance with SEC Section F5 'Communication Hub Forecasts & Orders'. Between acceptance of the CH delivery acceptance its installation at a premise, the SEC Party that placed the order requires a mechanism whereby they can notify DCC in the event of needing a fault or no fault return. This can be done by submitting DUIS Service Requests '8.14.3 Communications Hub Status Update – Fault Return' or '8.14.4 Communications Hub Status Update – No Fault Return'.

What is the issue?

Currently, these two Service Requests can only be submitted by SEC Parties in the role of Energy Suppliers (either an Import Supplier or a Gas Supplier). Other Parties that may order and install CHs on behalf of a Supplier cannot submit these requests, and must instead request the Supplier do so on their behalf.

Access to this notification and response mechanism will allow an ordering party acting on behalf of Suppliers to be able to trigger a CH return directly. This will enable a more efficient process for returning CHs and help to reduce the demand on each individual Energy Supplier. This modification was raised to allow all SEC Parties who order CHs a mechanism to execute a complete ordering and returns process.

SECOMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 5 of 15

This document is
classified as **White**

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3. Proposed Solution

Solution

The Proposer proposes to extend the Eligible User Roles for DUIS Service Requests 8.14.3 and 8.14.4 to include Registered Supplier Agents (RSAs).

The Proposer also proposes that, in addition to a mechanism for notifying the DCC, the ordering Party should also be provided with a response to acknowledge the acceptance or validation failure of the notification.

Draft legal text

The proposed legal text changes to SEC Appendix AD is provided in Attachment A.

4. Impacts

The following section sets out the impacts associated with the implementation of SECMP0039.

SEC Party impacts

Large Supplier Parties		Small Supplier Parties	
Electricity Network Parties		Gas Network Parties	
Other SEC Parties	X		

This modification will allow DCC Users registered as RSAs to be able to submit Service Requests 8.14.3 and 8.14.4 if they wish.

Central System impacts

DCC Systems	X	Party interfacing systems	
Smart Metering Systems		Communication Hubs	
Other systems			

DCC Systems will need to be amended to receive and validate Service Requests 8.14.3 and 8.14.4 from RSAs.

Testing

DCC will be required to carry out Pre-Integration Testing (PIT) and System Integration Testing (SIT) for SECMP0039.

The suggested PIT scope would include:

- Production, review and agreement of a design to enable development;
- Low level design production, development, unit test and any rework to achieve PIT complete status;
- Data generation and loading into the Test environment;
- Execution of System Tests through sufficient iterations to enable PIT complete;
- Design, implementation and execution of FAT scripts in accordance with assurance procedures used for Release 1.2; and
- Achieving PIT complete status and subsequent reporting.



Additional SIT is recommended by DCC for a modification of this type. It should however be noted that the scope of SIT is likely to be more focused on regression testing to confirm that the changes applied as part of this modification have not had an impact on the wider DCC Total Systems.

The suggested SIT scope would, at a high level, typically include:

- System Test script and data design;
- Data generation and loading into a co-ordinated System Test environment;
- Execution of System Tests through sufficient iterations to enable SIT complete.

SEC and Subsidiary Document impacts

Changes will be required to SEC Appendix AD 'DUIS v2.0' to include 'RSA' as an 'Eligible User Role' for Service Requests 8.14.3 and 8.14.4.

Impacts on other industry codes

None

Greenhouse Gas Emission impacts

No impacts anticipated.

5. Costs

Estimated Implementation costs

The total estimated implementation cost to delivery SECMP0039 is approximately £501,200.

SEC costs

The estimated SEC implementation cost is detailed in the table below:

SECAS implementation costs		
Implementation Activity	Effort (man days)	Cost
Application of approved changes to the SEC. Publication of new version of the SEC on the SEC Website and issuing this to SEC Parties. Review and update any impacted SEC guidance materials.	Two	£1,200 ²

DCC costs

The estimated DCC implementation cost is detailed in the table below:

DCC implementation costs (excluding VAT)	
Implementation Activity	Cost
Design	£250,000-500,000
Build	
Pre-Integration Testing	
System Integration Testing	Not provided
User Testing	
Implementation to Live	
Total estimated DCC implementation cost:	£250,000-£500,000

² SEC man day effort based on a blended rate of £600 per day.



6. Implementation

Recommended implementation date

The Working Group is recommending an implementation date for SECMP0039 of:

- **25th June 2020**, if a decision to approve is made by 25th June 2019; or
- **5th November 2020**, if a decision to approved is made after 25th June 2019 but on or before 5th November 2019.

The June 2020 SEC Release is the earliest SEC Systems Release that this modification can be targeted for. DCC requires a minimum of 12 months lead time, and it will not be possible to reach a decision on SECMP0039 in time for inclusion in the November 2019 Release.

SECMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 10 of 15

This document is
classified as **White**

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7. Working Group Discussions

Discussion of Proposed Solutions

The Working Group initially discussed how this Modification would facilitate SEC objectives (a) and (d) by facilitating return of CH's prior to installation.

Two solutions were initially proposed:

- Make changes to the Eligible User Roles within Service Requests 8.14.3 and 8.14.4; and/or
- Add additional functionality into the DCC's Operational Management Services (OMS) systems.

The Working Group considered that solving this issue via the OMS system would avoid the complications of the relevant participants needing to become a DUIS User. However, the Working Group also noted this option may be limited as there is a need for making sure that the other actions triggered by the DUIS Service Request take place, which means this option would still require corresponding changes to be made to DUIS. Suppliers would also be impacted by this option.

The DCC Preliminary Assessment concluded that this solution would be unfeasible as it would result a manual process. DCC noted to the Working Group that there were two OMS systems, for each of the two Communication Service Providers, with no integration between these and the Data Service Provider. In any event, even if this option was progressed, changes would still be required to DUIS as any request submitted via the OMS would still need the corresponding Service Request (8.14.3 or 8.14.4) to be created.

The Proposer and the Working Group therefore agreed to progress only the one proposed solution of allowing all potential participants that can order CHs to have access to Service Requests 8.14.3 and 8.14.4. This would be achieved by extending the list of eligible senders for these requests.

Which roles should be added to the list of Eligible Users?

The Working Group initially believed that the list of Eligible Users for Service Requests 8.14.3 and 8.14.4 should be extended to cover all potential participants that could order CHs, and therefore may need to return them prior to installation. During the DCC Preliminary Assessment, DCC believed that this could be achieved by adding 'Registered Supplier Agent' to the list.

The Working Group considered whether the addition of RSA would be sufficient, noting that this would not cover participants such as Meter Asset Providers (MAPs). One member believed the basic principle that Service Requests should only be made available to those that needed them. Another member, who was from a MAP, did not believe they needed to be included in the list of Eligible Users, and was comfortable with only adding RSA.

SECMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 11 of 15

This document is
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The Working Group agreed that, as long as respondents to the Working Group Consultation did not identify any issues, the addition of RSA would be sufficient to deliver the SECMP0039 solution.

What validation should be performed on submissions from RSAs?

The Working Group sought to clarify what validation DCC needed to perform on a Service Request received from an RSA. In addition to the basic validation of confirming the sender was an RSA, members wanted DCC to validate that the RSA was submitting a request on behalf of a Supplier for which it was confirmed they were working for. One member noted they did not want an RSA to send a request on their behalf when it was not working for them. The Working Group agreed that this validation needed to be included in the solution.



8. Working Group's Conclusions

The Working Group's **majority** view is that SECMP0039 better facilitates General SEC Objectives (a) and(d) and should be **approved**.

Benefits and drawbacks of SECMP0039

The Proposer and the Working Group have identified the following benefits and drawbacks related to SECMP0039:

Benefits

- This will remove the need for Small Suppliers to become involved when one of their Supplier Agents needs to return a Communications Hub, which streamlines the process and reduces the burden on them. Members note that while Large Suppliers are able to manage this themselves, Small Suppliers don't have the same logistics and so often use agents to perform activities such as installing CHs on their behalf. Efficiency in this process is reduced if the agents have to request the Small Supplier submit Service Requests on their behalf each time they need to trigger a return, incurring costs on the Small Supplier in time and effort.
- It allows for greater consistency of service provided by agents across the industry, where agents can operate on behalf of their Suppliers. Members note that CH returns process does not currently align with the wider industry standard of allowing agents to work on behalf of Suppliers, due to them being unable to submit the corresponding Service Requests; this change would remove this impediment and bring this returns process in line with this model.
- It may also reduce operational costs, which benefits the consumer. However, DCC clarified a monthly shipment of returns will reduce costs but if smaller users were to send back CHs individually then it could be more costly. In any event, this change would not affect the subsequent administration for returning a CH, only the means by which it is triggered and who it can be triggered by.

Drawbacks

No drawbacks were identified by the Working Group.

SECMP0039
Draft Modification
Report

9th July 2018

Version 1.0

Page 13 of 15

This document is
classified as **White**

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Views against the General SEC Objectives

Objective (a)³

The majority of the Working Group believes that this modification better facilitates the efficient procurement of Communication Hubs by enabling ordering parties to support Small Suppliers in the effective provision, installation and operation of Smart Metering. Small Suppliers seek Other SEC Parties to provide a 'full managed service', particularly in regard to the logistics involved in the Smart metering rollout; better allowing this will reduce costs and administrative burden.

One member was neutral as they could not see an overall benefit for the costs that this modification would incur.

Objective (d)⁴

The majority of the Working Group believes that this modification better facilitates effective competition as it will allow all ordering parties to be able to carry out a complete ordering and returns process. It will also help lower costs and administrative burden for smaller Suppliers. This change will also bring the CH returns process into line with the wider industry approach of allowing agents to perform tasks on behalf of their Suppliers, and so corrects a flaw in the design of this particular process.

One member was neutral as they could not see an overall benefit for the costs that this modification would incur.

For the avoidance of doubt, the Working Group believe that SECMP0039 is neutral against the remaining Objectives.

³ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

⁴ Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy.

Appendix 1: Glossary

The table below provides definitions of the terms used in this document.

Acronym	Defined Term
BEIS	Department for Business, Energy and Industrial Strategy
CH	Communications Hub
DCC	Data Communications Company
DCUSA	Distribution Connection Use of System Agreement
DUIS	DCC User Interface Specifications
DMR	Draft Modification Report
FMR	Final Modification Report
MRA	Master Registration Agreement
MRC	Modification Report Consultation
Ofgem	The Office of Gas and Electricity Markets
PIT	Pre-Integration Testing
RSA	Registered Supplier Agent
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SECCo	Smart Energy Code Company
SIT	System Integration Testing
WGC	Working Group Consultation