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Stage 04: Modification Report Consultation Responses

SECMP0029 'Business Continuity and Disaster Recovery Testing Amendments'

What stage is this document in the process?

01	Initial Assessment
02	Refinement Process
03	Modification Report
04	Decision

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 Talia Addy on 020 7090 1010 or email SEC.Change@gemserv.com.

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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 22nd August 2018, where it will determine whether SECMP0029 should be approved or rejected.

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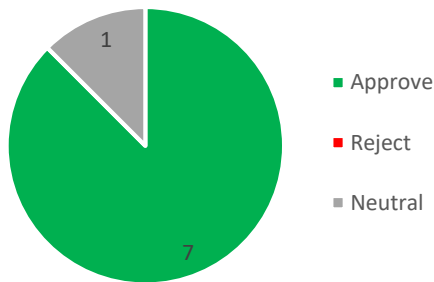
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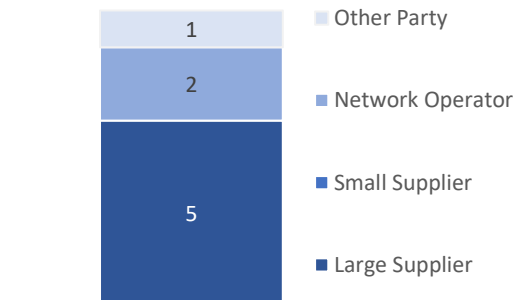
Summary of Responses

This section summarises the responses received to the SECMP0029 MRC.

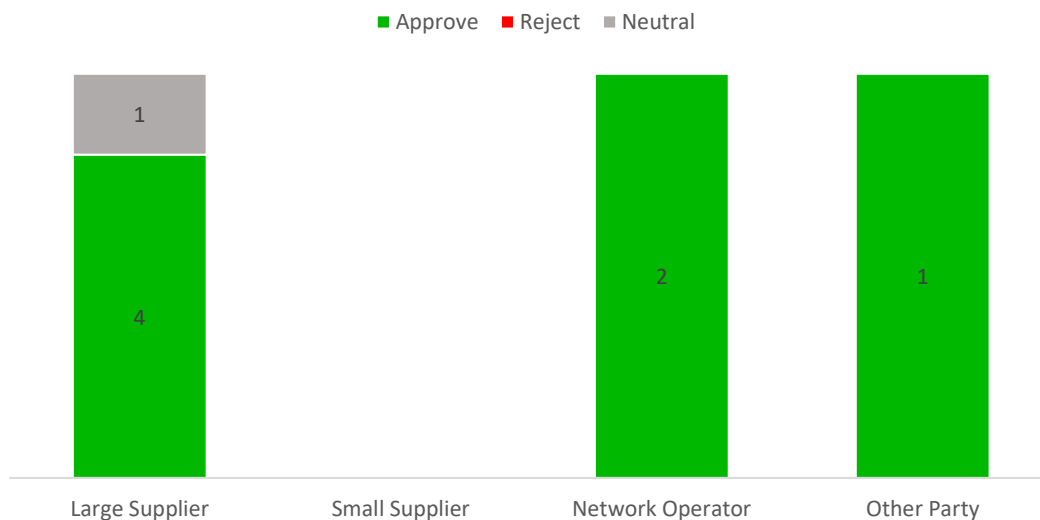
Respondents Views



Number of Respondents (by Party Type)



Views by Party Type



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Question 1

Q1: Do you believe that the proposed solution better facilitates the SEC Objectives and should be approved?

Party Name	Party Category	Yes/No/ Neutral	Comments
E.ON Energy Solutions	Large Supplier	Neutral	<p>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).</p> <p>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).</p>
Landis+Gyr	Other SEC Party	Yes	As it better facilitates SEC objectives "a" and "c"
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.
Scottish and Southern Electricity Networks (SSEN)	Network Party	Yes	SSEN agree with the working group that General SEC Objective (a) is facilitated by this proposed modification
EDF Energy	Large Supplier	Yes	We agree that the proposed solution better facilitates SEC objective (a) and the efficient provision, installation, and

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			<p>operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.</p> <p>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.</p>
SSE	Large Supplier	Yes	We support the workgroup's view that this will better facilitate Objective A and Objective C.
Npower	Large Supplier	Yes	We are supportive of this modification and believe it better facilitates the SEC objectives as outlined within the modification
Utility Warehouse Ltd	Large Supplier	Yes	We believe this modification better facilitates general objectives (a) and (c) by providing Suppliers with appropriate notice of BCDR testing, allowing them to prepare for outages.

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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
E.ON Energy Solutions	Large Supplier	Neutral	<p>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 legal drafting still permits the DCC to provide less than the required 60WD notice. It is our view following agreement via consultation, the BCDR date should not be subject to change resulting from pipeline reviews or the implementation of Modifications etcetera.</p> <p>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 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.</p>

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			We are therefore neutral to the implementation of this Modification because whilst the costs of implementation are minimal and there is potential for value to be delivered, the value of this solution is currently questionable.
Landis+Gyr	Other SEC Party	Yes	-
Western Power Distribution	Network Party	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.
Scottish and Southern Electricity Networks	Network Party	Yes	All costs associated with this change are insignificant and the change should therefore be supported.
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.
SSE	Large Supplier	Yes	We believe the intention of this modification is to improve the engagement between SEC Parties and the DCC in the BCDR testing process, which we fully support. The costs to implement this modification are relatively small but should create a significant improvement to the current arrangement, so we believe this modification should be approved.

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Npower	Large Supplier	Yes	-
Utility Warehouse Ltd	Large Supplier	Yes	We believe that this modification should be approved as it will ensure that parties are provided with appropriate notice of outages so these can be managed efficiently.

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Question 3

Q3: Do you agree that the legal text changes deliver the intention of the modification?

Party Name	Party Category	Yes/No	Comments
E.ON Energy Solutions	Large Supplier	Yes	<p>We believe that the legal text reflects the solution arrived at by the Working Group in part. We have the following comments regarding the proposed text:</p> <p>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. We would also note that we do not believe this text to be reflective of Working Group discussions, wherein it was noted that the only circumstances in which less than 60WD notice could be provided were rescheduling was reasonably required for the BCDR following the 60WDs notification (after the consultation). The current legal drafting however does not convey this requirement, and instead permits less than 60WDs notification to be given without requiring this to be for a rescheduled BCDR event that has previously following the correct process.</p>
Landis+Gyr	Other SEC Party	Yes	-
Western Power Distribution	Network Party	Yes	-

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Scottish and Southern Electricity Networks	Network Party	Yes	-
EDF Energy	Large Supplier	Yes	We believe that the additional changes to the legal text better deliver the intention of the modification.
SSE	Large Supplier	Yes	-
Npower	Large Supplier	Yes	-
Utility Warehouse Ltd	Large Supplier	Yes	Yes, we agree the revised legal text delivers the intent of the modification.

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Question 4

Q4: Do you agree with the recommended implementation date?

Party Name	Party Category	Yes/No	Comments
E.ON Energy Solutions	Large Supplier	Neutral	In view of no consultation known to be shortly forthcoming from the DCC concerning the BCDR arrangements, we have no objection to this being implemented in November 2018. We would however note that we do not believe it appropriate for Parties to be asked whether or not they agree with flouting the Release Management Policy; it is for the Panel to determine changes to a Release.
Landis+Gyr	Other SEC Party	Yes	-
Western Power Distribution	Network Party	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.
Scottish and Southern Electricity Networks	Network Party	Yes	-
EDF Energy	Large Supplier	Yes	We agree with the recommended implementation date.
SSE	Large Supplier	Yes	-

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Npower	Large Supplier	Yes	-
Utility Warehouse Ltd	Large Supplier	Yes	We agree with the recommended implementation date

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Question 5

Q5: Do you have any further comments on SECMP0029?

Party Name	Party Category	Yes/No	Comments
E.ON Energy Solutions	Large Supplier	No	-
Landis+Gyr	Other SEC Party	No	-
Western Power Distribution	Network Party	No	-
Scottish and Southern Electricity Networks	Network Party	No	-
EDF Energy	Large Supplier	No	-
SSE	Large Supplier	Yes	<p>We are in support of this modification, but there are some questions this raises for us that we hope can be clarified:</p> <ul style="list-style-type: none"> - Dates: While we appreciate that 60 working days warning will be given, and that "SEC Parties will be able to advise the DCC of any date/time ranges where a test is not desirable for them", will we be able to suggest preferred dates to DCC in advance, or will this happen solely in the consultation period? Many of our requests are at the beginning of the month, so testing at this time

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			<p>would present operational risks for us that we hope could be avoided.</p> <p>- Notification: Which contact is used to notify us that testing will take place? The contact used by DCC is not the same as that used for SEC notifications. We would appreciate clarification on where the notification of testing is sent to, so that we can ensure the relevant stakeholders and teams are notified.</p>
Npower	Large Supplier	No	-
Utility Warehouse Ltd	Large Supplier	No	-

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