



This document is classified as **White** in accordance with the Panel Information Policy. Information can be shared with the public, and any members may publish the information, subject to copyright.

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

SECMP0051 ‘Section D Review: Amendments to the Fast Track Modification Process’

About this document

This document contains the collated responses to the SECMP0051 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 Harry Jones on 020 7081 3345 or email SEC.Change@gemserv.com.

SECMP0051

Working Group
Consultation
Response Form

6th August 2018

Version 1.0

Page 1 of 13

This document is
classified as **White**

© SECCo 2018

Content

Summary of Responses	3
Question 1	4
Question 2	6
Question 3	8
Question 4	10
Question 5	12

About this Document

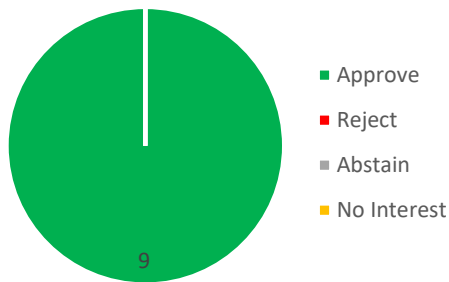
This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0051.

The Change Board will consider these responses at its meeting on 22nd August 2018, where it will determine whether SECMP0051 should be approved.

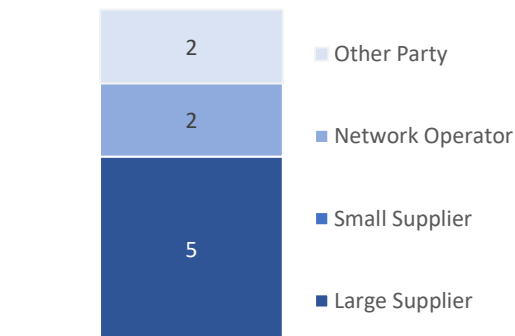
Summary of Responses

This section summarises the responses received to the SECMP0051 MRC.

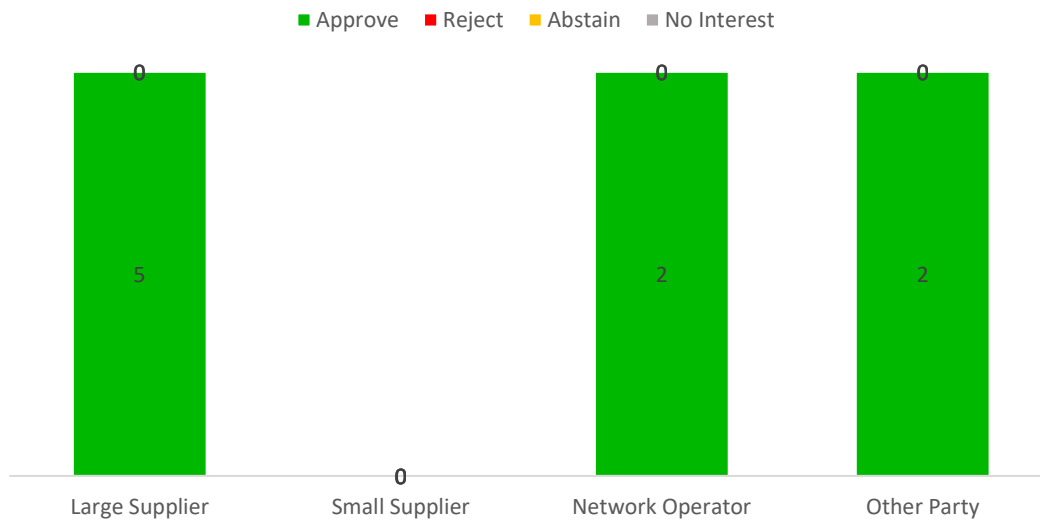
Respondents Views



Number of Respondents (by Party Type)



Views by Party Type





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
ZIV Automation UK, LTd.	Other SEC Party	Yes	
Utilita Energy	Large Supplier	Yes	We agree with the Working Groups view that SECMP0051 better facilitates SEC Objective G and should be approved. We believe the Modification will lead to time being saved in the case of raising and progressing a fast-track Modification.
E.ON	Large Supplier	Yes	When comparing the proposed Fast-Track (FT) Modification process being proposed, to the current FT Modification process it is evident that some Modifications raised as FT Modifications may progress with greater efficiency, and therein facilitate SEC objective g.
Landis + Gyr	Other	Yes	As it is better facilitates SEC objective "g"
Northern Gas Networks Ltd.	Gas Network Operator	Yes	We support this modification as the proposal is identical to that of the existing Fast Track process of the UNC.
SSEN	Electricity Network Operator	Yes	SSEN believes that this modification better facilitates SEC Objective (g) by aiding the efficient administration of the code and aligning the process with other codes.

SECMP0051

Modification Report
Consultation
Responses

6th August 2018

Version 1.0

Page 4 of 13

This document is
classified as **White**

© SECCo 2018



SEC
Smart Energy Code

SSE	Large Supplier	Yes	We agree that this solution will better facilitate SEC Objective G.
Npower	Large Supplier	Yes	We are supportive of this modification. We agree that the process used in the SEC should be aligned with that in other industry codes, governed by CACoP and therefore this would met SEC objective G
EDF	Large Supplier	Yes	We agree that SECMP0051 better facilitates General SEC Objective (g) and should be approved. This change will make the fast track modifications process more efficient and timely, and will align the SEC with the same process under the energy codes which simplifies market governance.

SECMP0051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 5 of 13

This document is
classified as **White**

© SECCo 2018



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 SECMP0051 should be approved?

Party Name	Party Category	Yes/No	Comments
ZIV Automation UK, LTd.	Other SEC Party	Neutral	
Utilita Energy	Large Supplier	Yes	We are supportive of the Modification and believe where a fast-track Modification is raised it can be progressed and implemented in shorter timescales. Since however there has been very few fast-track Modifications to date we don't believe the Modification will have a major impact to improving the efficiency of the SEC Change Process overall.
E.ON	Large Supplier	Yes	Following discussions at the last Working Group (WG) and clarifications made with the Modification Report Consultation documents, we are comfortable that the proposed solution provides mitigations to our concerns over materiality and self-perpetuating Modifications.
Landis + Gyr	Other	Yes	
Northern Gas Networks Ltd.	Gas Network Operator	Yes	Yes, the amendments would make the Fast Track process more efficient and would help align any implementation timescales should there be cross-code impacts.

SECMP0051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 6 of 13

This document is
classified as **White**

© SECCo 2018



SEC
Smart Energy Code

SSEN	Electricity Network Operator	Yes	
SSE	Large Supplier	Yes	
Npower	Large Supplier	Yes	
EDF	Large Supplier	Yes	This change will make the fast track modifications process more efficient and timely, and will align the SEC with the same process under the energy codes which simplifies market governance

SECMPO051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 7 of 13

This document is
classified as **White**

© SECCo 2018



Question 3

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

Party Name	Party Category	Yes/No	Comments
ZIV Automation UK, LTd.	Other SEC Party	Neutral	
Utilita Energy	Large Supplier	Yes	We believe our comments to the Working Group Report consultation have since been rectified.
E.ON	Large Supplier	Yes	<p>We believe that the current legal drafting reflects the intent of the Modification.</p> <p>We would note however that D9.5 may warrant further consideration for optimisation: if publication of the decision on a Fast-Track Modification occurs on the same day as such a decision is made, for seven months of the year the 15 Working Days (WDs) objection window does not close at least 5WDs prior to the next Panel meeting. Consequently, Panel will receive late papers for any Fast-Track Modifications that have been objected to.</p> <p>If Panel were happy to accept these as late Papers that would optimise the efficiency of this solution, although it should be highlighted that where they do not, this would not introduce more time than the current FT Modification process.</p>
Landis + Gyr	Other	Yes	

SECMP0051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 8 of 13

This document is
classified as **White**

© SECCo 2018



Northern Gas Networks Ltd.	Gas Network Operator	Yes	
SSEN	Electricity Network Operator	Yes	
SSE	Large Supplier	Yes	
Npower	Large Supplier	Yes	
EDF	Large Supplier	Yes	We have not identified any issues with the draft legal text changes.

SECMPO051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 9 of 13

This document is
classified as **White**

© SECCo 2018



Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
ZIV Automation UK, LTd.	Other SEC Party	Neutral	
Utilita Energy	Large Supplier	Yes	We believe this Modification should be implemented as soon as possible and we are comfortable with the November release window.
E.ON	Large Supplier	Neutral	We would not object to the proposed implementation date if Panel were to approve it, but we note that we do not feel 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	Yes	
Northern Gas Networks Ltd.	Gas Network Operator	Neutral	
SSEN	Electricity Network Operator	Yes	
SSE	Large Supplier	Yes	

SECMP0051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 10 of 13

This document is
classified as **White**

© SECCo 2018



Npower	Large Supplier	Yes	
EDF	Large Supplier	Yes	We agree with the recommended implementation date

SECMPO051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 11 of 13

This document is
classified as **White**

© SECCo 2018



Question 5

Q5: Do you have any further comments?

Party Name	Party Category	Yes/No	Comments
ZIV Automation UK, LTd.	Other SEC Party	No	
Utilita Energy	Large Supplier	No	
E.ON	Large Supplier	Yes	The current draft legal text means that any Fast-Track Modification that is objected to must be routed through an alternative Modification Path (D9.5 (b)), there is however no process to ensure that objections to Fast-Track Modifications are valid. We believe it would be advantageous for the WG to consider this point.
Landis + Gyr	Other	No	
Northern Gas Networks Ltd.	Gas Network Operator	No	
SSEN	Electricity Network Operator	No	
SSE	Large Supplier	No	

SECMP0051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 12 of 13

This document is
classified as **White**

© SECCo 2018



SEC
Smart Energy Code

Npower	Large Supplier	No	
EDF	Large Supplier	No	

SECMPO051

Working Group
Consultation
Responses

6th August 2018

Version 1.0

Page 13 of 13

This document is
classified as **White**

© SECCo 2018