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Stage 03: Final Modification Report

SECMP0061:

Enduring SEC Release Provisions

Summary

This Modification seeks to make changes to the SEC to clarify the powers and obligations of the SEC Panel to oversee SEC Releases on an enduring basis.

Impacts



- SEC Panel
- There are no impacts on SEC Parties identified.
- There are no impacts on Data Communications Company (DCC) Central Systems or Party interfacing systems

What stage is this document in the process?

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

SECAS Contact:

Name:

Nikki Olomo

Number:

020 7081 3095

Email:

SEC.Change@gemserv.com

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About this Document

This document is the Final Modification Report (FMR) for SECMP0061. This document provides detailed information on the issue, solution(s), impacts, costs, industry consultation as well as the Panel's discussions and conclusions on the modification.

The Change Board will consider this modification at its meeting on 24th October 2018, where it will determine whether SECMP0061 should be approved or rejected by the Authority.

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1. Summary

What is the issue?

To date, BEIS has overseen the development activities being carried out by DCC in relation to the Smart Metering Implementation Programme (SMIP). This has included agreeing the technical content of Releases, defect fixes, and the Release Implementation Approach as well as monitoring the progress of Releases.

BEIS is transitioning out of these activities, with the expectation being that a subset of these will be transferred to the SEC Panel to oversee SEC Releases on an enduring basis. However, the SEC does not currently include the full set of obligations and powers regarding oversight of Release Management for SEC Releases that have been identified by the SEC Panel.

What is the Proposed Solution?

This Modification proposes to amend [SEC Section D 'Modification Process'](#) to confer the SEC Panel with the full set of agreed powers and obligations to oversee SEC Releases.

Potential impacts

Party

There are no anticipated Party Impacts.

System

There are no anticipated System Impacts.

Implementation Costs

The estimated cost to implement SECMP0061 is approximately £1,200 and is limited to SEC administration time and effort to deliver the necessary SEC changes.

Implementation Date

The Panel has agreed an implementation date of:

- **28th February 2019** (February 2019 SEC Release), if a decision to approve is made by 14th February 2019; or
- **27th June 2019** (June 2019 SEC Release), if a decision to approve is made after 14th February 2019 but by 13th June 2019.

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A fall-back implementation date of the June 2019 Release has been recommended in case a decision cannot be made by 30th January 2019.

This approach will allow the Panel to develop the changes to the policy and consult upon them to go live at the same time.

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2. What is the issue?

Background

Any approved SEC Modification Proposal is expected to be implemented as part of a scheduled SEC Release. The [Panel Release Management Policy](#), last updated in February 2018, lays out the Panel's intended approach to implementing SEC Releases, including their schedule and the key steps to follow. To date, the only modifications to be implemented have been document-only changes (no impact on DCC Systems).

BEIS currently oversees the development activities being carried out by DCC in relation to the SMIP. This has included agreeing the technical content of Releases, including defect fixes, and the Release Implementation Approach, and monitoring the progress of Releases.

BEIS is transitioning out of these activities, with the expectation being that a subset of these will be transferred to the SEC Panel in order for it to oversee SEC Releases on an enduring basis. However, following a review of SEC Section D, it has been concluded that the SEC does not include the full set of obligations and powers regarding oversight of Release Management for SEC Releases by the SEC Panel.

At the July 2018 Panel meeting, the Panel considered the responsibilities that it should take on with regards to overseeing the delivery of SEC Releases which is defined as the implementation of a package of one or more Modification Proposals (see [Panel paper SECP 58_1307_05](#) for full details). The Panel agreed that the responsibilities it would take on from BEIS should be included in its duties. At its August 2018 meeting the Panel considered the changes to the SEC that will be required to fully enable these responsibilities to be included in its duties (see [Panel paper SECP 59_1008_16](#)); all of which have been outlined in the legal text for this modification.

What is the issue?

The process of BEIS transitioning out of the Release Management activities means that changes need to be made to the SEC for the SEC Panel to properly perform its duties. The Panel does not believe that the current provisions in the SEC encompass the full set of responsibilities that it will need to take on, and so changes are needed to clarify the arrangements going forward.

The Panel agreed the changes that are required to the SEC and considered that the most efficient way to implement these changes is for a Party to raise a Modification Proposal. This modification has been raised following this view from the Panel.

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3. Proposed Solution

Solution

SECMP0061 'Enduring SEC Release Provisions' was raised by Scottish Power on 5th September 2018. It proposes to amend [SEC Section D10 'Implementation'](#) to cover the core powers and obligations with regards to the Panel's oversight of SEC Releases, as discussed by the Panel.

The underlying details of how the Panel will discharge these duties will be contained within the SEC Release Management Policy. This policy will be a renamed version of the current Panel Release Management Policy and will remain a document owned and maintained by the Panel, with any changes to it needing to be consulted upon first.

This arrangement will provide greater flexibility to update the underlying process in the future in response to feedback and lessons learnt, while ensuring the key obligations are contained within the SEC and so would need a modification to change.

To be clear, these changes only relate to the oversight of SEC Releases, which is defined as the implementation of a package of one or more SEC Modification Proposals.

Legal text

The legal text changes to SEC Sections A and D are provided in Attachment B.

Views against the General SEC Objectives

The Proposer believes that this Modification Proposal better facilitates General SEC **Objective (g)**¹ as adding the core powers and obligations regarding the Panel's oversight of SEC Releases into SEC Section D would ensure that the governance arrangements for releases are clear, facilitating transparency. By including the core powers in the SEC and providing the detail of how these will be discharged in a Panel-owned document, this will make it easier to amend the underlying processes in response to any feedback, while ensuring the core obligations are enshrined in the SEC. This will facilitate the efficient administration of the process.

For the avoidance of doubt, the Proposer believes that this modification is neutral against all other SEC Objectives.

¹ (g) to facilitate the efficient and transparent administration and implementation of this Code



4. Impacts

The following section sets out the impacts associated with the implementation of SECMP0061.

SEC Party impacts

There are no impacts on SEC Parties anticipated in implementing this modification, although this modification will impose additional obligations on DCC.

SEC Panel impacts

This modification will impact the SEC Panel as it will extend their powers and give them additional responsibilities in regard to Releases.

Central System impacts

There are no central system impacts anticipated and no testing will be required.

SEC and Subsidiary Document impacts

Changes will be required to SEC Sections A 'Definitions and Interpretations' and D 'Modification Process'.

Impacts on other industry codes

There are no impacts to other industry codes.

Greenhouse Gas Emission impacts

There are no Greenhouse Gas Emission impacts.

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5. Costs

Estimated Implementation costs

The costs to implement SECMP0061 will be limited to Code Administration time and effort for:

- Making the necessary amendments to the SEC;
- Releasing a new version of the SEC to SEC Parties; and
- Publishing the updated SEC on the SEC website.

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 a 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

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



6. Implementation

Recommended implementation date

The Panel has agreed an implementation date of:

- **28th February 2019** (February 2019 SEC Release), if a decision to approve is made by 14th February 2019; or
- **27th June 2019** (June 2019 SEC Release), if a decision to approve is made after 14th February 2019 but by 13th June 2019.

This approach will allow the Panel to develop the changes to the Release Management Policy and consult upon these with the industry in time for these changes to go live in parallel with SECMP0061.

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7. Panel discussions & conclusions

Panel discussions

At the July Panel meeting, the Panel considered the responsibilities that it should take on with regards to overseeing the delivery of SEC Releases. Please see [Panel paper SECP 58 1307 05](#) for full details of this discussion.

At its August meeting, the Panel considered the changes to the SEC that will be required to fully enable these responsibilities to be included in its duties, as members considered that the SEC does not currently include the full set of obligations and powers regarding Release Management. Please see [Panel paper SECP 59 1008 16](#) for full details of the areas the Panel believed needed to be covered in the SEC.

The Panel considered that SECMP0061 was intended only to clarify within the SEC the full set of core powers and obligations available to the Panel regarding oversight of SEC Releases, which had already been discussed by the Panel over previous meetings. The detail of how these would be discharged will be documented in the SEC Release Management Policy document, which will be consulted on separately. Members therefore felt that there would be little additional benefit that further consideration by a Working Group would add. It was therefore agreed that SECMP0061 should proceed directly to Modification Report Consultation.

Panel conclusions

The Panel **unanimously** agree that due process has been followed and that SECMP0061 should progress directly to Modification Report Consultation.

The Panel also agreed that SECMP0061 is a Path 2: Authority Determined Modification Proposal and that the draft legal text changes to the SEC deliver the intention of the modification.

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Appendix 2: Glossary

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

Acronym	Defined Term
DCC	Data and Communications Company
FMR	Final Modification Report
SEC	Smart Energy Code
SMIP	Smart Metering Implementation Programme

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