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Stage 04: Modification Report Consultation Responses

SECMP0061 'Enduring SEC Release Provision'

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 SECMP0061 Modification Report Consultation (MRC). The Change Board will consider these responses when making its recommendation to the Authority on this modification.

If you would like any further information, or to discuss any questions you may have, please do not hesitate to contact Nikki Olomo on 020 7081 3095 or email SEC.Change@gemserv.com.

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Consultation
Response Form

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About this Document

This document contains the collated responses to the Modification Report Consultation (MRC) for SECMP0061.

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

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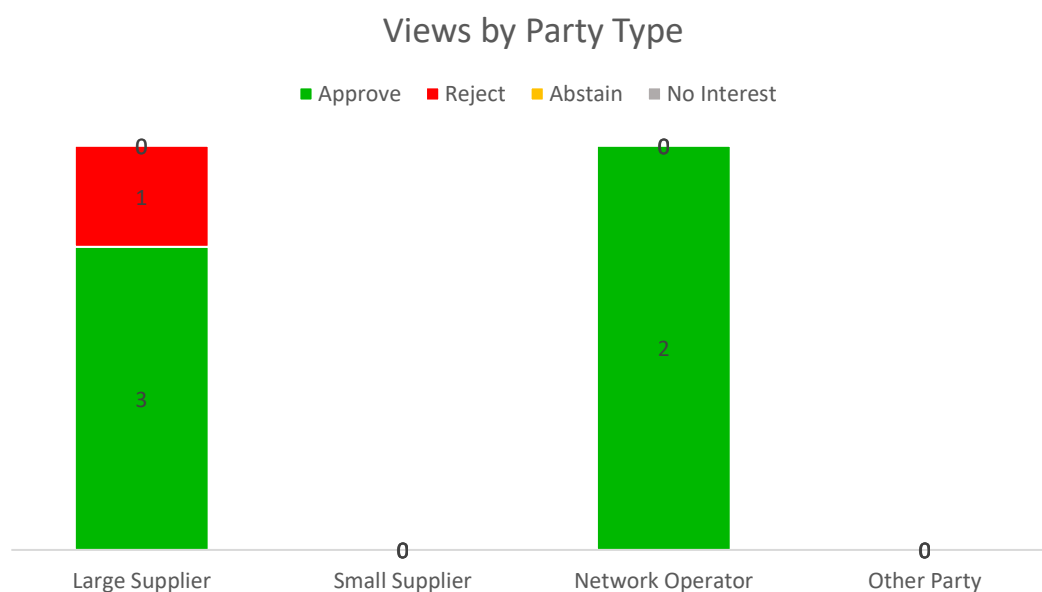
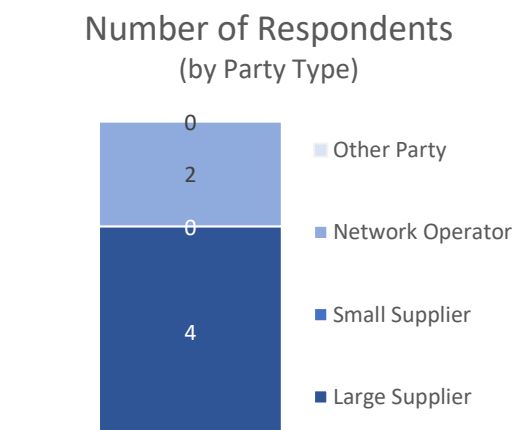
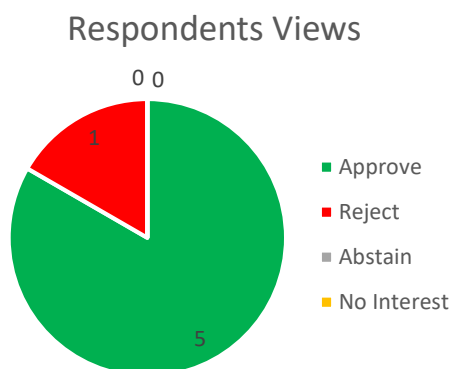
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Summary of Responses

This section summarises the responses received to the SECMP0061 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
EDF	Large Supplier	Yes	We agree that the proposed solution better facilitates SEC Objective (g) as it will provide the SEC Panels with the powers appropriate to its ongoing role in managing the implementation of SEC Releases. SEC Parties rely on the SEC Panel to be able to manage the Release process effectively and implement the changes that they have, through the Change Board, decided should be made. The proposed change will provide the SEC Panel with additional capability to enable them to fulfil this role.
Utilita	Large Supplier	Yes	We believe this Modification better facilitates SEC objective g through providing better clarity of the SEC Panel's role for overseeing future SEC releases.
SSEN	Network Operator	Yes	No further comment to add above the rationale as expressed in the SECMP0061.
Western Power Distribution	Network Operator	Yes	We agree with the proposer that this modification better facilitates SEC Objective (g) as the inclusion of the obligations of the SEC Panel to oversee SEC Releases on an enduring basis within the SEC will make it clear and transparent what those obligations are and who is responsible.
N Power	Large Supplier	Yes	We believe this is a positive step forward and will enable the transition to a more enduring governance model

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			We understand that SoS takes precedence in terms of the decision making, however, we would like to see some assurance which provides clarity around the final decision making between SECAS and BEIS
E.ON	Large Supplier	No	<p>Whilst we are supportive of the concept of Release Management and Panel's involvement therein, we feel that the current solution inhibits the facilitation of SEC objective g in many places, namely the divergence between the progression of this Modification solution and the consultation on changes to the Release Management Policy, and the 'solution gaps' highlighted in our comments below.</p> <p>We further feel that in the absence of a transitional Release process, there will be continued delays to DCC System-impacting SEC Releases as the result of conflict with the Enrolment and Adoption project which we also perceive to contravene SEC objective g.</p>

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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 SECMP0061 should be approved?

Party Name	Party Category	Yes/No	Comments
EDF	Large Supplier	Yes	We agree that SECMP0061 should be approved.
Utilita	Large Supplier	Yes	We believe the proposed changes will provide for a more transparent understanding of SEC releases and the SEC Panel's powers and responsibilities.
SSEN	Network Operator	Yes	-
Western Power Distribution	Network Operator	Yes	The costs proposed appear reasonable. We will not incur any costs as a result of this modification.
N Power	Large Supplier	Yes	-
E.ON	Large Supplier	No	<p>As given above, we feel that further work is required for the completion of this solution, and we believe that this Proposal would have benefited from a Working Group as well as alignment with the Release Management Policy consultation.</p> <p>We find that we cannot accept the risks posed by the proposed solution until the following have been addressed such that the solution is robust and unambiguous:</p>

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			<p>D10.2 – we believe that this ought to stipulate how Parties are notified of the actions so determined by Panel and when, such that they may accord with the obligations placed upon them in D10.4</p> <p>D10.4 – we believe that this clause ought to be amended to reflect the required level of reasonability for Parties, such as has been afforded the DCC in D10.10 and D10.14. We suggest “Each Party shall co-operate with the Panel to the extent that may reasonably be required to ensure...”</p> <p>D10.5(a) – we note that the current legal drafting only permits a Panel to request single change to the implementation timetable of a Modification (i.e. a request can only be made to amend the first approved implementation timetable). We would request clarification to confirm that this is reflective of intent</p> <p>D10.5 – we believe that this clause ought to be amended to include notification requirements to inform Parties of any change to an implementation timetable in a timely manner</p> <p>D10.5 – we believe that this clause ought to be amended to prevent perpetuating undue burden on Parties with regard to their obligations under Section D. For clarity, where the Implementation timetable changes following a direction made by the Authority, all obligations in Section D (e.g. D10.4; D10.10; D10.13; D10.16; D10.18, and D10.19) now apply to the implementation timetable as directed by the Authority thus permitting the eventuality of overly-burdensome requirements on Parties. We would therefore request additional consideration to this drafting such as to mitigate this eventuality and ensure that implementation timetable amendments are made ahead of any Party undertaking actions to achieve the first such timetable, or that any actions undertaken by Parties in accordance with Section D are not duplicated following an implementation timetable amendment. We would further ask that where any such</p>
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			<p>amendment would result in cost implications associated with SEC Releases, that this clause requires the Panel to consult Parties ahead of requesting a new implementation timetable</p> <p>D10.5 – we believe that this clause ought to be amended to clarify the outcome of an unsuccessful request to amend the implementation timetable</p> <p>D10.8(d) – we would request clarification on this point such that we may understand whether the Panel will be monitoring cost-drivers of SEC Releases, or the actual costs of SEC Releases, thus what the Panel may be reporting to the Authority. Where the clarification is for the latter we would request that this clause be amended such that Panel report these costs to Parties as well as the Authority</p> <p>D10.8(e) – we would request clarification on ‘live operation’ here such that we may understand whether this refers simply to the publication of a version of SEC so amended to include the variation/s required by approved Modification Proposals, or whether this extends to include the implementation of DCC System changes required by approved Modification Proposals. Where this relates to the former we would ask what mechanism beyond the approval process that the Panel would like to utilise to determine that a SEC Release be implemented</p> <p>D10.9 – We would request that this clause be amended such that there is an obligation on Panel to ensure that the consultation responses and conclusions are made available to all Parties in a timely manner. We would further seek clarification concerning how Parties will be notified of a change to the SEC Release Management Policy</p>
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			<p>D10.11 – we believe that this clause should be amended such that Parties are consulted with for any procurement activity involved in the appointment of an external auditor, such that they may assess the business case for said activity. We further believe that this clause ought to stipulate that the cost of this activity is socialised in accordance with the charging methodology in Section K</p> <p>D10.11 – we believe that this clause ought to be amended such that there is an obligation on the DCC to undertake action as necessary following such an audit to ensure value, and that consideration be given to the extension of such an obligation to DCC's Service Providers. Where adherence to such an obligation incurs cost, we further believe that the DCC ought to consult DCC Users with regard to which actions to undertake in terms of the cost-benefit case for any audit recommendation. In either case, we believe that any auditor report ought to be shared with DCC Users (in a redacted form where commercial sensitivity so requires)</p> <p>D10.11 – we would like to understand from the DCC that the requirements in this clause present no conflict with the Smart Meter Communication Licence</p> <p>D10.12 – we believe that this clause ought to be amended such that the location of the publication is provided to ensure transparency</p> <p>D10.13(b) and (f) – we believe that these requirements ought to be consulted upon with DCC Users and that D10.13 or D10.18 ought to be amended to reflect this obligation. It would be our preference that Panel sub-committees such as TAG are consulted alongside DCC Users. We feel it imperative that these requirements be subject to consultation because of the impact that they will have on our business in terms of time, resource and cost. We further feel that DCC Users ought to be given the opportunity to understand the testing requirements and timelines ahead of</p>
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			<p>any SEC Release such that they may understand any potential operational risk following the DCC deployment associated with any SEC Release, and assess the value and cost-effectiveness of such a Release with particular consideration to the 'go-live criteria'. We further believe that it will be necessary for DCC to be included within this consultation such DCC Users may acquire necessary assurances concerning the availability of testing slots and readiness. Moreover we believe that the Panel ought to consider all consultation responses in the context of change conflict so highlighted by DCC or DCC Users before finalising the content of a SEC Release Implementation Document. The cut-off requirements contained within the Release Management Policy mean that changes cannot be made to DCC Systems within 12 months of their approval, which on average (to date) is over two years after the change requirement is identified via the SEC Modification route. Businesses undergo an awful lot of change per annum and standing-up a testing team for each DCC System-impacting SEC Release is not an obligation that we are happy to accept without the opportunity to assess and assert the impact that will have on our business</p> <p>D10.14 – we believe that this clause ought to be clarified such that the obligation lends itself to the approved implementation timetable, thus suggest "... for a SEC Release, in such a manner as to permit the Modifications within the relevant SEC Release to be implemented in accordance with the approved implementation timetable."</p> <p>D10.15 – to our knowledge, there is currently no change process established to permit amendments to the SEC Release Implementation Document and we believe that such a process is necessary in order for Parties have a transparent understanding of the SEC Release process that they will have to manage. We believe that such a process ought to be referenced within this clause</p>
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			<p>D10.16 – we believe that this clause ought to be amended such that the obligation follows consultation as well as Panel approval, as given in our comments against D10.13(b) and (f)</p> <p>D10.17 – we feel that this clause ought to be amended such that there is no ambiguity concerning who Parties appeal to and how, and what path an appeal shall take where it is not referred to the Authority</p> <p>D10.18 – we believe that timelines are required within this clause such that DCC Users are entirely clear as to the SEC Release process with regard to the implications for and expectations of them.</p> <p>D10.19(c) – we would request clarification as to ‘risks in business terms’: does this intend that the DCC will highlight risks to their business or will try to assume the risks to the businesses of DCC Users? If the latter, we would like to understand the process behind this obligation</p> <p>D10.20 – to our knowledge, there is currently no change process established to permit amendments to the SEC Release Testing Approach Document and we believe that such a process is necessary in order for Parties have a transparent understanding of the SEC Release process that they will have to manage. We believe that such a process needs to clearly stipulate the arrangements for approving and such amendment, and that the process ought to be referenced within this clause</p>
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Question 3

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

Party Name	Party Category	Yes/No	Comments
EDF	Large Supplier	Yes	<p>While we agree that the draft legal text changes deliver the intention of the modification we do have a question about one of the changes.</p> <p>The proposed new text for Section D10.8(a) States that the SEC Panel Release Management Policy will include a mechanism for allocating Modification proposals into SEC Releases. However the implementation timetable (including the proposed implementation date) forms part of the Modification Report that informs the vote at the Change Board. We would welcome clarity on how decisions on when an approved Modification Proposal will be made and who by – if this is determined by the Panel then the process for allocating Modification proposals into SEC Releases needs to be transparent, and involve SEC Parties.</p>
Utilita	Large Supplier	Yes	Following review of the proposed legal text we have no comments.
SSEN	Network Operator	Yes	-
Western Power Distribution	Network Operator	Yes	We agree that the draft legal text changes deliver the intent of the modification.
N Power	Large Supplier	Yes	-

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E.ON	Large Supplier	Yes	<p>We believe that the drafted legal text introduces powers and obligations for Panel's oversight of SEC Releases.</p> <p>We have the following additional comments on the legal text:</p> <p>Section A</p> <p>Technical Code Specifications – we believe that the commas (bar the last) ought to be semi-colons, and that the instances of double-spacing ought to be removed</p> <p>Section D</p> <p>D6.8(e) – we believe that the last line of text contains an erroneous instance of 'which' that ought to be removed</p> <p>D10.1 – we believe that the first iteration of Authority-Led Variations ought to be 'Authority-Led Variation'</p> <p>D10.4 – we believe that this clause ought to be clarified such that Parties understand that 'such date' refers to that stipulated in the approved implementation timetable</p> <p>D10.5(b) – we believe that this ought to be written "defined in relation to" rather than "defined by relation to"</p> <p>D10.8(c) – we believe that 'define' ought to be written 'defines'</p>
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			<p>D10.11 – for clarity, we believe that ‘such’ ought to be inserted between ‘approve any’ and ‘external auditor’s terms’</p> <p>D10.13(d), (e) and (f) – for consistency, we believe that ‘defines’ ought to be written in lower-case</p> <p>D10.13(f) – we would request clarification as to whether this clause is alluding to D10.8(e)</p>
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Question 4

Q4: Do you agree with recommended implementation date?

Party Name	Party Category	Yes/No	Comments
EDF	Large Supplier	Yes	We agree with the proposed implementation date.
Utilita	Large Supplier	Yes	Yes, agree with the proposed implementation dates put forward by the Panel.
SSEN	Network Operator	Yes	-
Western Power Distribution	Network Operator	Yes	As the modification is a documentation change only we agree with the proposed implementation date
N Power	Large Supplier	Yes	-
E.ON	Large Supplier	No	As given above, we believe that a transitional Policy ought to be considered for the delivery of outstanding Modifications, and that their delivery ought to be mindful of conflict with existing delivery requirements of the DCC.

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Question 5

Q5: Do you have any further comments?

Party Name	Party Category	Yes/No	Comments
EDF	Large Supplier	Yes	<p>While we agree with the proposed changes to the powers of the SEC Panel we remain concerned that the SEC change process, and especially the costs associated with making changes to the DCC systems, means that it will be almost impossible for meaningful changes to the implemented. The costs that are associated with such changes are significant, and are often difficult to justify with business cases that cover these costs.</p> <p>While these proposed changes enable the SEC Panel to assess the forecast and actual costs of a SEC Release we remain concerned that it is so difficult to get changes approved at the Change Board, that few changes will make it as far as a SEC Release. This issue still requires resolution.</p>
Utilita	Large Supplier	No	N/A
SSEN	Network Operator	No	-
Western Power Distribution	Network Operator	No	-
N Power	Large Supplier	No	-

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E.ON	Large Supplier	No	-
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