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Stage 02: Draft Modification Report

SECMP0058:

Changes to the governance of the Self-Service Interface

Summary

This modification seeks to remove the Self-Service Interface (SSI) Design Specifications from the SEC and include them in a new lower level document which is created and maintained by the DCC, with any future changes being consulted on and agreed by the SEC Panel. This will ensure that improvements can be implemented to the SSI in a timelier manner whilst also ensuring that the industry remain in control of what new functionality is deployed, along with the associated costs.

Working Group View



- The Working Group unanimously believes that SECMP0058 should be approved.

Impacts



- This modification will impact all users of the SSI.
- There are no impacts on 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

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About this Document

This document is a Draft Modification Report (DMR). This document provides detailed information on the issue, solutions, impacts, costs and Working Group discussions and conclusion on SECMP0058.

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).

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1. Summary

What is the issue?

The DCC has received feedback from Users stating that, whilst the SSI is compliant in its current form, it has insufficient functionality to fully support them as effectively as required.

[SEC Appendix AH 'Self-Service Interface Design Specification'](#) currently sets out the detailed specifications for the SSI. The information set out in Appendix AH is specified at a level of detail which is very prescriptive, and which can only be changed by raising and progressing a SEC Modification. Due to this, the DCC is unable to make rapid changes to the SSI to improve Users ability to access DCC services, which is undermining the usefulness of the SSI over time as the needs of Users change.

What is the Proposed Solution?

This Modification seeks to remove the low-level detail and functional requirements from SEC Appendix AH and move these to a new specification document titled the SSI Baseline Requirements Document (Attachment D) which would be created and maintained by the DCC. The SSI Baseline Requirements Document will not be subject to the Section D Modifications Process and instead DCC will be able to make changes to the document following consultation with Parties, and with the agreement of the SEC Panel (or a Sub-Committee to which the Panel has formally delegated the required decision-making power).

Impacts – Proposed Solution

Party

This modification is expected to impact the DCC as the new SSI Baseline Requirements Document will need to be developed and maintained by the DCC.

There are no impacts of any other SEC Parties identified.

SEC Panel

Under this modification, the SEC Panel (or any delegated authority or Sub-Committee) will be given the power to approve changes to the new SSI Baseline Requirements Document. This means that the SEC Panel will have to review and consider any changes to this SSI document.

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System

There are no system impacts anticipated for this modification.

Implementation Costs

The total estimated implementation cost to deliver SECMP0058 is approximately £1,200. This total cost consists of SEC Administration time and effort.

Implementation Date

The Working Group is recommending an implementation date for SECMP0058 of:

- 28th February 2019, if a decision to approve is made on or before 14th February.
- or
- Ten Working Days following approval if a decision to approve is made after 14th February.

Working Group's views

The Working Group believes **unanimously** that SECMP0058 does better facilitate the SEC Objectives. The Working Group therefore believes that this Modification Proposal should be **approved**.



2. What is the issue?

What is the SSI?

The Self-Service Interface (SSI) is a web-based portal which allows Users to obtain information about, and interact with, DCC Services. This includes raising and monitoring the status of incidents, viewing smart metering inventory and accessing external systems.

What discussions have already been held?

DCC initially informed the Operations Group on 27th March 2018 on the feedback it had received from Users about the SSI within SEC Appendix AH, outlining the changes that DCC would like to make for the SSI for it to work more effectively. It was noted that the functionality provided by the SSI was set in the SSI Design Specification, which is part of the SEC, and that this prevented making changes to the SSI without a Modification Proposal. The Operations Group discussed the issue and agreed that improvements to the SSI were needed, and that an agile approach might be considered, but noted that it would still need to include appropriate governance under the SEC.

DCC presented slides to the Operations Group on 24th April 2018 covering their proposals for change to the SSI. DCC outlined their preferred approach to amend SEC Appendix AH removing the detailed specification and replacing this with a set of functional requirements and governance requirements. The detailed SSI specification document would be managed by DCC outside the SEC but referenced in the SEC. This would mean that making changes to the SSI specification in the future would not need a SEC Modification. It was noted however, that a modification would be required to make these changes to Appendix AH and its governance. DCC also proposed that an alternative approach was to leave Appendix AH as the detailed specification but with an alternate change process to enable swift and timely changes to be made. DCC then advised the Operations Group on 26th June 2018 that they would be raising a modification to replace the detailed SSI specification in SEC Appendix AH.

On 24th July 2018 DCC explained to the Operations Group the Modification Proposal they would be raising to replace Appendix AH with a new document that would not be subject to the Section D Modifications Process itself (but would still require a modification to implement the document), enabling DCC to more effectively make improvements to the SSI. The possibility of using the Operations Group as a Working Group was then discussed due to their prior knowledge of the issue. The proposed new document which can be found in Attachment D (this has since been updated to a newer version), was then circulated by SECAS to all Operations Group members on 30th July 2018.

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What is the issue?

The DCC has received feedback from Users stating that, whilst the SSI is compliant in its current form, it has insufficient functionality to fully support them as effectively as required.

SEC Appendix AH 'Self-Service Interface Design Specification' currently sets out the detailed specifications for the SSI. The information set out in Appendix AH is specified at a level of detail which is very prescriptive, and which can only be changed by raising and progressing a modification. Due to this, DCC is unable to make rapid changes to the SSI to improve Users ability to access DCC services, which is undermining the usefulness of the SSI over time as the needs of Users change.

3. Proposed Solution

Solution

DCC raised [SECMP0058 'Changes to the governance of the Self-Service Interface'](#) on 2nd August 2018.

This modification seeks to remove the low-level detail and functional requirements from SEC Appendix AH from the SEC and move these to a new specification document titled the SSI Baseline Requirements Document which would be created and maintained by the DCC.

The proposed SSI Baseline Requirements Document will allow full traceability of the requirements outlined in SEC Sections H8.15(c) and H8.16 to the lowest level of detail. It will also reflect the requirements of [Appendix AI 'Self Service Interface Code of Connection'](#).

DCC propose that the new DCC managed document will not be subject to the Section D Modification Process. Instead, it can be amended by DCC following consultation with Parties, and with the agreement of the SEC Panel (or a Sub-Committee to which the Panel has formally delegated the required decision-making power).

It is proposed that Appendix AH should remain as a SEC Subsidiary Document and will be used to apply the access control rules contained in [Section H8.16](#) of the SEC to specific functionality and information provided by the SSI. Access control will be applied to newly created Functional Components, which will have the same scope as the existing Interface Transactions in order to preserve the existing levels of access control. Because the purpose of Appendix AH will be focussed on providing detailed rules around access control, rather than being a technical specification, it is proposed that it should be re-named to 'the Self-Service Interface Access Control Specification'. Appendix AH will also contain the key governance rules which will apply to the SSI Baseline Requirements Document.

The technical details of each Functional Component will be contained in the new SSI Baseline Requirements Document, along with details of how Functional Components will be used to provide services to Users via the SSI. It is proposed that these aspects should be subject to a new governance process which allows the DCC to make changes following consultation with Parties and subject to agreement from the Panel (or a Sub-Committee to which the Panel has formally delegated the required decision-making power). The SSI Baseline Requirements Document will contain the detailed step-by-step governance rules which will apply when making changes to the SSI Baseline Requirements Document in order that detailed governance steps may be changed without needing to raise a Section D Modification Proposal.

The amended version of Appendix AH and the SSI Baseline Requirements Document are structured to provide direct traceability of regulatory requirements between the two documents. Appendix AH establishes Business Functional Domains, which define the

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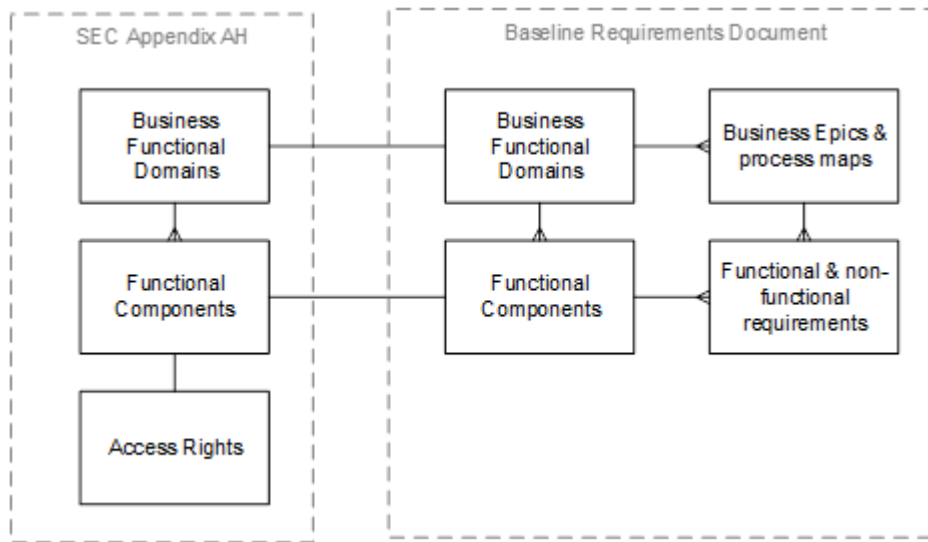
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capabilities provided by the SSI in terms of groupings of one or more Functional Components. Both the Business Functional Domains and Functional Components are included in the SSI Baseline Requirements Document and are linked to Epics, which describe User activities and are associated to Process Maps. The relationship between different elements of each document are illustrated in the diagram below:



Draft legal text

The proposed legal text changes to Section A, Section H, Appendix I and Appendix AI are provided in Attachment B.

The proposed legal text changes to Appendix AH is provided in Attachment C.

4. Impacts

The following section sets out the impacts associated with the implementation of SECMP0058.

SEC Party impacts

This modification is expected to impact the DCC as the new SSI Baseline Requirements Document will need to be developed and maintained by the DCC. There are no impacts of any other SEC Parties identified.

SEC Panel impacts

Under this modification, the SEC Panel (or any delegated Sub-Committee) will be given the power to approve changes to the SSI and the new SSI Baseline Requirements Document. This means that the SEC Panel will have to review and consider any changes to the SSI and the SSI document.

Central System impacts

There are no system impacts anticipated for this modification.

Testing

There is no testing anticipated to be needed for this modification.

SEC and Subsidiary Document impacts

The following SEC documents will all be impacted by this modification;

- [Section A 'Definitions and interpretations'](#);
- [Section H 'DCC Services'](#);
- [Appendix I 'CH Installation and Maintenance Support'](#);
- [Appendix AH 'Self Service Interface Design Specification'](#); and
- [Appendix AI 'Self Service Interface Code of Connection'](#)

Impacts on other industry codes

There are no other codes anticipated to be impacted as a result of this modification.

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Greenhouse Gas Emission impacts

This modification will not have an impact on Greenhouse Gas Emissions.

5. Costs

Estimated Implementation costs

The total estimated implementation cost to delivery SECMP0058 is approximately £1,200.

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 ¹

¹ 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 SECMP0058 of:

- 28th February 2019, if a decision to approve is made on or before 14th February.
or
- Ten Working Days following approval if a decision to approve is made after 14th February.

The February 2019 SEC Release is the earliest SEC Release that this modification could be implemented in. The Working Group as well as the Proposer are keen for this process to be implemented as soon as possible, due to the current interim approach to SSI changes running out and the need to move to an enduring approach.

7. Working Group Discussions

What impact will this modification have on planned DCC maintenance durations?

In the proposal form for this modification, DCC references that future changes to the SSI will affect the levels of planned maintenance, but that this will be the subject of a separate modification. The Working Group considered how big an impact this modification could have on planned maintenance durations.

The SEC allows for four hours per month for planned DCC SSI system maintenance. However, a temporary arrangement is now in place that allows DCC a window of six hours per week to carry out system maintenance. The Working Group questioned the impacts this modification would have on planned DCC maintenance durations. DCC clarified that the window for system maintenance covers the deployment phase of changes to the SSI and that future SSI changes would not cause them to exceed this. DCC added that on the rare exception DCC did need to exceed six hours system maintenance in a week, they would have to consult with the Operations Group first, who have been delegated by the Panel to oversee changes to the SSI.

For the avoidance of doubt, when the temporary SSI maintenance arrangements lapse, the DCC will adhere to SEC section H8.3 & H8.4 for any Planned maintenance activities.

How can it be ensured that the costs of subsequent changes to the SSI will be included in the consultation issued by DCC?

The Panel noted that the costs of subsequent changes to the SSI should be included in the consultation issued by DCC so that these could be considered by all SEC Parties. The Panel also raised a query over whether these costs could be signed off outside of the modification process, as this would require clear governance and appropriate documentation. They asked the Working Group to ensure appropriate governance around costs was clearly defined and included within the solution of this modification.

The Working Group discussed the SSI Governance Process in depth. Initially the Proposer raised the idea of consulting on SSI impacting changes with the Customer Working Group (a DCC-led forum) and the Operations Group. However, Working Group members advised that the Customer Working Group is not formally recognised under the SEC and nor does it contain enough representation across SEC Parties to be able to form a sufficient consultation. Working Group members also advised that a consultation using the Operations Group would not be adequate as the Operations Group doesn't contain enough SEC Party representation either. The Working Group then agreed that an industry consultation issued to all SEC Parties would have to occur during the process and that this would last for at least 15 Working Days, allowing SEC Parties to consider the consultation and provide responses in a reasonable timeframe.

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The Working Group agreed that SSI change consultations would last for 15 Working Days. There was discussion as to the size and frequency of the consultations in the short-term and the long-term. These consultations would focus on the packages of work to be completed in a number of sprints over a subsequent defined time period. It was agreed that in the short-term the consultations should cover batches of fourth months in size due to the backlog, but that eventually these consultations could occur yearly with a view to what would be the sprints for the on a less frequent basis as the number of proposed SSI changes decreases. In addition, rather than consulting on each SSI change proposal individually, these consultations would include batches of proposed SSI changes that had been agglomerated over the previous months.

The level of detail in the consultations were discussed and it was agreed they should include the following details:

- The type(s) of proposed SSI change(s);
- Which SEC Parties are expected to be impacted;
- Whether each change is seeking to add, remove or amend functionality;
- The reasons why each change is being proposed;
- The anticipated cost range (the proposer agreed that SEC parties must be made aware of the costs for such changes and that they were happy to have obligations for formalisation); and
- The anticipated timescales to develop and deploy.

It was agreed that the SEC Panel or a delegated Sub-Committee would have to manage work requiring sign-off such as the development and deployment of SSI changes. The Working Group recommended that this work should be delegated to the Operations Group as they currently consider SSI changes under the current 'sprints' process utilised by DCC. Furthermore, the Panel, or the delegated Sub-Committee, would manage and approve any changes to a package of work consulted upon (e.g. the addition of new items or changes to deployment dates) without any further consultation with the industry.

The level of communication was highlighted as a key factor in relation to the consultation and it was agreed that the scope of the SSI changes and the impacts would be clearly communicated. It was proposed that SECAS could communicate the consultations on behalf of DCC and that having an agreed list at the start of the process with suitable contacts would ensure relevant individuals would receive the consultations.

Full detail on the proposed SSI governance process, as well as the consultation details, can be found in Attachment E.



Sub-Committee Terms of Reference

The governance process for making changes to the SSI were discussed by the Working Group and it was suggested that any work requiring sign off could be delegated to the Operations Group. A member of the Working Group advised that although all members within this group could vote, the current terms of reference around quoracy and voting rights were quite vague. The Working Group agreed that the Operations Group Terms of Reference would require amendments to include conditions on decisions regarding making changes to the SSI.

Prioritisation of SSI changes

A member of the Working Group advised that although they were meant to be, user requirements had not been prioritised during the current 'sprints' process under Planned Maintenance of the SSI, but that the DCC's requirements were prioritised. Another Working Group member agreed and advised that there needed to be a level of detail given by DCC as to why certain SSI changes are prioritised. DCC acknowledged this feedback and will look into this as part of the consultation.

SSI Baseline Requirements Document

The SSI Baseline Requirements Document is intended to contain the low-level detail that will be removed from SEC Appendix AH. It was initially proposed that the SSI Baseline Requirements Document would not show the changes to the SSI but that a 'delta document' would be periodically released showing the latest changes to the SSI. Some members of the Working Group strongly opposed this due to a perceived lack of efficiency and transparency and advised that there had to be a live version of the SSI Baseline Requirements Document. Following this feedback, the DCC agreed to maintain a live version of the SSI Baseline Requirements Document as well as releasing a 'delta document' to illustrate the changes to the SSI from the previous version.

Draft legal text changes

Initially DCC had proposed to remove SEC Appendix AH in its entirety and that the SSI Baseline Requirements Document (Attachment D) would form its replacement. However, the majority of the Working Group were opposed to this and advised that both DCC and User obligations needed to remain in the SEC as SEC Parties would not be legally bound to comply with the SSI Baseline Requirements Document if it fell outside the SEC. Other Working Group members then suggested that, rather than completely removing the content from Appendix AH, it could be left with just a set of core principles and requirements. This was still not adequate to some Working members and so the idea of a 'slimmed down' SEC

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Appendix AH was agreed upon which would include all DCC and User obligations as well more detail than simply a set of core principles, particularly in relation to way that the access controls set out in Section H8.16 are applied to the provision of specific functionality and information via the SSI. This approach has been reflected in the attached legal text.

8. Working Group's Conclusions

The Working Group's **unanimous** view is that SECMP0058 better facilitates the General SEC Objectives and should be **approved**.

Benefits and drawbacks of SECMP0058

The Proposer and the Working Group have identified the following benefits and drawbacks related to SECMP0058:

Benefits

- The Working Group acknowledge, in terms of impacts, this modification would result in stronger governance being in place for changes to the SSI.
- This modification would result in unwanted low-level detail being removed from the SEC. This would contribute to a more efficient SSI change process as proposed changes would have less chance of impacting the legal text in the SEC and would therefore not require a Modification Proposal to utilise the Modifications Process.
- The use of a delta document alongside the Business Requirements Document would allow for greater control of SSI changes through to delivery as well as an audit trail for SEC Parties to have an ongoing view of changes to the SSI.
- Considering the anticipated benefits that this modification should bring, DCC will be able to make changes to the SSI fast enough to meet the changing needs of SSI users. Improving the SSI will encourage more SEC Parties to use it and there will therefore be a reduction of interaction outside of the SSI.

Drawbacks

One drawback was identified in the Working Group in that to contain the level of detail required in the industry consultation, DCC would have to carry out more development prior to the consultation, which would increase the risk of cost wastage if the proposed SSI changes would not come to fruition, although this risk was not considered to increase significantly compared to the existing Section D Modification Process.

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Views against the General SEC Objectives

Objective (a²)

The **majority** of the Working Group agreed that this modification facilitates SEC Objective (a), though some members felt that it would facilitate SEC Objective (g³) instead of (a) with the reason being that these two objectives can sometimes be misinterpreted for one another. The Working Group agreed that this Modification will provide Users with an improved means of accessing DCC Services directly, including information which could be critical to resolving issues related to the provision, installation and operation of Smart Metering Systems.

Objective (b⁴)

The **majority** of the Working Group agreed that this modification facilitates SEC Objective (b), to enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence. This Modification will better enable DCC to meet the Interim General Objective in its licence, specifically it will support improved co-ordination of the activities, systems, and procedures of SEC Parties by providing better access to DCC Services and information.

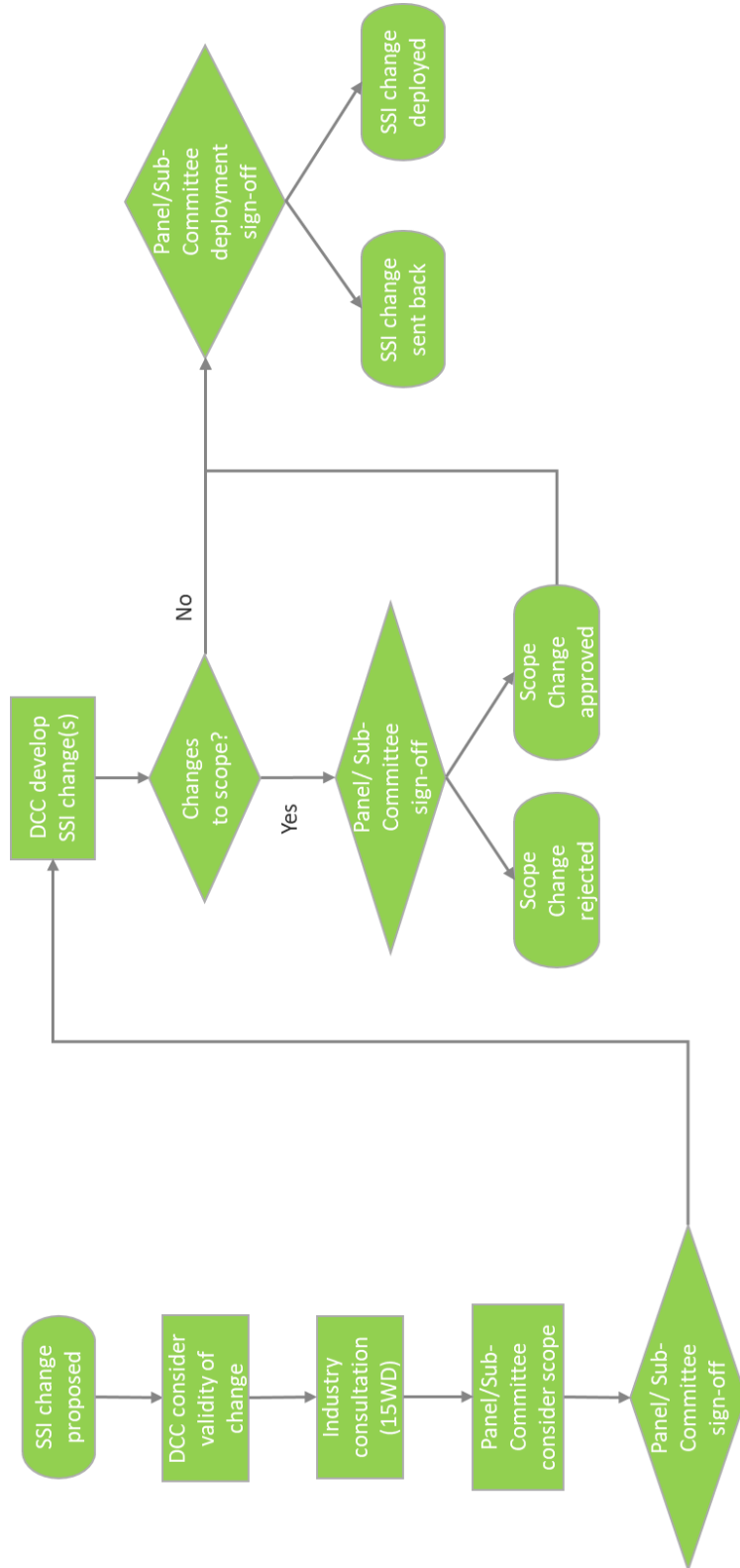
For the avoidance of doubt, the Working Group believe that SECMP0058 is neutral against all other SEC Objectives.

² To facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain.

³ To facilitate the efficient and transparent administration and implementation of this Code.

⁴ To enable the DCC to comply at all times with the General Objectives of the DCC (as defined in the DCC Licence), and to efficiently discharge the other obligations imposed upon it by the DCC Licence.

Appendix 1: SSI Governance Process Map



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Appendix 2: Glossary

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

Acronym	Definition
DCC	Data Communications Company
DMR	Draft Modification Report
IMR	Initial Modification Report
MRC	Modification Report Consultation
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SSI	Self-Service Interface