



SSI Consultation

Consultation on proposed
changes to the Self-Service
Interface Change
Governance Process

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1. Background

The Self-Service Interface (SSI) is a web-based portal which allows Users to obtain information about, and interact with, Data Communications Company (DCC) Services. The requirements of which are set out in section H8 of the Smart Energy Code (SEC).

The SSI Change Governance Process was developed as part of the solution to SECMP0058 which removed low level SSI requirements from SEC section AH and allowed for SSI amendments to be progressed outside of the SEC Modification Process. The SSI Change Governance Process is a DCC owned document, and any amendments require consultation with DCC Users and approval by SEC Panel.

The SEC requires that any changes to the SSI are processed following the SSI Change Governance Process. This has resulted in two processes being required where a SSI Improvement Proposal (SIP) is also linked to a SEC Modification and adds unnecessary complication while also duplicating efforts.

It has therefore been proposed that SIPs related to SEC Modifications are processed through the SEC Modification process. The SSI Change Governance Process has been amended to reflect this and is available in a tracked changes version and clean format alongside this consultation.

DCC has also taken the opportunity to make other small adjustments to the Change Governance Process which it is hoped add clarity, while also amending some of the wording in to a more DCC familiar language. The process has also been transferred to the standard DCC template rather than that of SECAS.

Further information is provided in this consultation document below. Please note, in the interests of efficiency, some of the smaller wording changes are not described in this document since they don't change the process but are available for view in the tracked changes version document provided. Respondents are encouraged to comment on these changes if they have any concerns.

The closure date of this consultation is 1 July 2021.

2. SIPs linked to SEC Modification

SEC H8.15A requires that any changes to the SSI are processed following the SSI Change Governance Process. This has resulted in two processes being required where a SSI Improvement Proposal (SIP) is also linked to a SEC Modification and adds unnecessary complication while also duplicating efforts.

It is therefore proposed that where a SIP is also a requirement of a SEC Modification, that the SIP be progressed through the SEC Modification process. Under this proposal Users would continue to have the same rights to comment on the changes proposed but this would form part of the modification consultation process. Additionally, Impacts Assessments and the approval to develop and deploy would also fall under the SEC Modification process.

These changes reduce duplication of efforts and bring the SEC Modification and required SIP under the same process which it is hoped will provide for increased efficiency. A single Impact Assessment also allows the true cost of a modification to be more accurately assessed during the modification process.

Under section 1 of the process the following paragraph has been added to allow for this change:

Where a SIP is generated from a SEC Modification Proposal, that modification will not need to follow this change governance process. That proposal, including refinement, development and implementation, will be superseded with actions taken during the SEC Section D Modification Process. Parties will have the opportunity to comment on the proposal through the Modification Process including through a Refinement Consultation. Impact Assessments for these SSI changes will be combined with the wider modification Impact Assessment.

Question 1

Do you agree that the development of SIPs related to SEC Modifications should be combined with the SEC Modification process? Do you agree that the amendment is sufficient to allow SIP development to be combined with the SEC Modification process? If not, please provide a rationale for your response.

3. Amendments to Section 1 “Proposing Improvements to the SSI”

In addition to the change described above, this section has been amended in the following ways:

1. The requirement to propose an improvement on a prescribed form has been removed to allow for an easier path for Users to suggest amendments.
2. Requests that where a proposer believes the proposal is urgent that they highlight that to the DCC when proposing the improvement so that the urgency is clear and can be considered by DCC.

Question 2

Do you agree with the changes made to section 1? If not, please provide a rationale for your response.

4. Amendments to Section 3 “SSI Improvement Consultation”

This section has been amended in the following ways:

1. The title has been amended to *SSI Improvement Proposal Consultation* to better reflect the document purpose.
2. Wording which covered thoughts or decisions of the SECMP0058 working group have been removed since they don't describe the process.
3. The minimum time for a consultation period has been increased from 15 working days to 20 working days aligning to DCC aims to provide ample time for Users to reply. While also noting there may be occasions where a more urgent SIP could result in a shorter consultation period to allow for swifter progression.

Question 3

Do you agree with the changes made to section 3? If not, please provide a rationale for your response.

5. Amendments to Section 4 “Panel (or Sub-Committee) Impact Assessment sign-off”

In this section additional lines have been added to provide clarity should the Panel (or delegated sub-committee) reject progression to Impact Assessment. The additional text requires that the decision to reject progression to Impact Assessment also be accompanied by a direction to DCC to either refine or withdraw the SIP.

Question 4

Do you agree with the changes made to section 4 requiring the Panel to provide a decision on whether the SIP should be refined or withdrawn where approval to proceed to Impact Assessment isn't provided? If not, please provide a rationale for your response.

6. Additional Requirements for Testing Considerations

A new section titled “User Testing” has been added which requires DCC to make an assessment of whether user testing should be offered prior to deployment of the SIP. There is currently no requirement to offer testing. While there may be little benefit in offering testing on smaller

amendments, testing could prove valuable for larger or more complexed changes to prove the solution and allow Users to understand new. It should be noted that the provision of testing may increase costs and extend the implementation timeframe.

Question 5

Do you agree that DCC should consider the scope and complexity of an SSI change, and offer testing where larger or complexed changes are made? If not, please provide a rationale for your response.

7. Removal of Section 7 “Sub-Committee Terms of Reference”

The text in this section covered advice from the SECMP0058 working group including that the Panel could choose to delegate responsibility to the Operations Group since that group had historically been involved in SSI amendments. This section has been removed since it is not considered applicable to a process document, and the ability for the Panel to delegate is covered in section 4 and 5.

Question 6

Do you agree that section 7 is not required and should be removed? If not, please provide a rationale for your response.

8. Other Smaller Amendments

In the interests of efficiency other smaller wording changes have not been highlighted in this consultation paper but can be seen in the tracked changes version of the SSI Change Governance process published alongside this document. Reviewers are encouraged to comment on those changes should they have any concerns.

Question 7

Do you agree with other wording changes, or do you have any concerns about changes not highlighted in this consultation paper? Please provide a rationale for your response.

9. List of Consultation Questions

Question 1

Do you agree that the development of SIPs related to SEC Modifications should be combined with the SEC Modification process? Do you agree that the amendment is sufficient to allow SIP development to be combined with the SEC Modification process? If not, please provide a rationale for your response.

Question 2

Do you agree with the changes made to section 1? If not, please provide a rationale for your response.

Question 3

Do you agree with the changes made to section 3? If not, please provide a rationale for your response.

Question 4

Do you agree with the changes made to section 4 requiring the Panel to provide a decision on whether the SIP should be refined or withdrawn where approval to proceed to Impact assessment isn't provided? If not, please provide a rationale for your response.

Question 5

Do you agree that DCC should consider the scope and complexity of an SSI change, and offer testing where larger or complexed changes are made? If not, please provide a rationale for your response.

Question 6

Do you agree that section 7 is not required and should be removed? If not, please provide a rationale for your response.

Question 7

Do you agree with other wording changes, or do you have any concerns about changes not highlighted in this consultation paper? Please provide a rationale for your response.

10. Next Steps

These are the next steps following the consultation closure on 1 July 2021.

DCC will review and collate consultation responses and consider any relevant refinements to the SIP. The refined SIP and collated consultation responses will be provided to the SEC Panel or delegated Sub-Committee for approval or rejection as we move through the SSI Change Governance Process.

11. How to respond

Please provide responses by 17:00 on 1 July 2021 to DCC at:
consultations@smartdcc.co.uk

DCC will complete a summary of questions, comments and responses to be shared with SEC Operations Group and be added to the documentation of the consultation.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation response to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department of Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.