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CONSOLIDATED IMPACT ASSESSMENT RESPONSES

R0103 CENTRAL PROVISION OF DCC TECHNICAL CONTACTS FOR REQUESTING TEST CERTIFICATES

On 23 May 2023 the Code Manager issued an Impact Assessment Request to industry to seek feedback on the Initial Assessment Report.

The purpose of this document is to consolidate the responses and for the Code Manager to answer any questions raised within those responses.

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RESPONSE TYPE	NON-CONFIDENTIAL
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RESPONSIBLE COMMITTEE	Change Panel
LEAD ANALYST	Colette Baldwin

DATE CONSULTATION ISSUED	23/05/2023
RESPONSE DEADLINE	14/07/2023

Question 1:	Do you have any comments on the proposed solution or legal text?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks DNO	No comments, this would appear to be a sensible solution	Noted
National Grid Electricity Distribution (DNO)	Whilst we understand the solution that is being proposed to we have concerns around the controls to "prevent any other actions being taken by the Switching Operator-appointed Technical Contacts". Whilst we appreciate that this control may just be a "list" of technical contacts, we believe that this should be included within a redraft of the legal text so that there may be recourse in the event of inappropriate actions. In reference to 'ensuring that the appropriate controls are in place' – What are these – can this details be enhanced further to RBAC would restrict? All controls should be base lined and signed off by CSS User – is our only recourse the removal of the SO appointed technical contact?	There are two controls, covering both prevention and audit: - **Prevention** - These SO-nominated TCs will be restricted via the role-based access (RBAC) functionality from being able to perform any actions other than requesting Test Environment PKI Certificates in ServiceNow. - **Audit** - All actions undertaken by these TCs will be visible and traceable if there were to be any concerns about inappropriate actions. The legal text is written at a higher, principle, level as is consistent with other similar obligations in the Schedule, where responsibility is clearly placed on the relevant party for ensuring compliance, but without explicitly describing what the controls should be. In regard to sign off by CSS Users, this is very unlikely to be possible on an individual basis; approval for the proposed approach will be via the CP.

Question 2:	Do you believe there are any requirements that have not been addressed through the solution or legal text? If yes, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks DNO	SPEN have not identified anything additional.	Thank you
National Grid Electricity Distribution (DNO)	As above	We don't believe the legal text requires any amendment, the description of the controls is consistent with other similar REC drafting, putting the responsibility on the Switching Operator to prevent any activities outside those permitted.

Question 3:	No direct CSS User impacts have been identified from this solution. Do you agree with this? If not, please describe the impacts you consider relevant.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks DNO	Yes	noted
National Grid Electricity Distribution (DNO)	Whilst no impacts have been identified with the proposed solution, we would highlight that the creation of this role does have implications for those parties in which they are acting on behalf of.	See above response

	You have identified that controls will have to be in place to prevent other actions – this is indicative of potential impacts to CSS User	

Question 4:	Would the approval of this change result in additional costs being incurred by your organisation? If so, please provide details.	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks DNO	No costs identified	
National Grid Electricity Distribution (DNO)	The assumption is that the creation of this role would not have a financial implication to our organisation. However, if we are to monitor the actions undertaken by this role, and potentially remove them from our listings – this would have an impact on time spent.	For those Parties who provide their own Technical Contacts, there is no reason for the SO to step in to provide substitute Technical Contacts. On-going monitoring will not be necessary for those organisations who provide their own Technical Contacts.

Question 5:	Do you have any additional comments?	
RESPONDENT DETAILS	**RESPONSE**	**CODE MANAGER COMMENTS**
Scottish Power Energy Networks DNO	No additional comments	Thank you for your responses
National Grid Electricity Distribution (DNO)	There are no controls described to ensure that the SO appointed Technical Contacts perform no other task. You have eluded to "controls" but not provided clarification.	Please see our earlier comments on this point.