

Report Phase Consultation Responses

E L E X O N

P474 'Ongoing governance, funding and operation of the Data Integration Platform (DIP)'

This Report Phase Consultation was issued on 17 June 2024, with responses invited by 17 July 2024. Any confidential responses will be visible to the Authority only.

Phase

Initial Report

Consultation

Final Report

Consultation Respondents

Respondent	Role(s) Represented
IMServ Europe	Supplier Agent
British Gas	Supplier
Scottish Power Energy Networks	Distributor
Electricity North West Limited	Distributor
Stark	Distributor
Northern Powergrid Ltd	Distributor
National Grid Electricity Distribution	Distributor
MHHS Programme	MHHS Programme Codes Workstream
Scottish and Southern Electricity Networks	Distributor
UK Power Networks	Distributor
RECCo	Code Body

P474
Authority Led SCR
Modification Consultation

19 July 2024

Version 1.0

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Question 1: Do you agree with the Panel's initial unanimous recommendation that P474 should be approved?

Summary

Yes	No	Neutral/No Comment	Other
6	7	0	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	-
British Gas	Yes	-
Scottish Power Energy Networks	No	<p>We have concerns around the reference to ISO/IEC 27000 throughout the legal text and supporting documents. This certification has a number of serials that may not apply to industry parties and which they will be bound to given the wording in this change.</p> <p>We believe that further clarification is essential in this proposal to define explicitly which parts of the ISO accreditation are applicable to DIP users, as without this it remains open to interpretation, and could place an additional burden on parties.</p> <p>We also note that references to ISO 27000 and ISO27001 appear to be used interchangeable through the documentation. We require clarity on the serials to be used. If ISO27000 is to be used, then this includes all associated serials, and the impact is significant.</p> <p>We require clear wording relating to the SO/IEC 27000 series and which areas are applicable to Network Operators as a DIP User and the relevant evidence that would be required to submit as part of the MHHS Qualification process, we would suggest the following:</p> <ul style="list-style-type: none"> • ISO27001 only. • That this applies only to systems that connect directly to the DIP, in our case our DIP adapter. • Evidence of ISO27001 certification for our DIP adaptor provider for the relevant systems in scope is sufficient and no additional audit evidence is required.

Respondent	Response	Rationale
		<p>Notwithstanding the above point we are supportive of the requirement to have governance arrangements in place for the DIP.</p>
<p>Electricity North West Limited</p>	<p>No</p>	<p>Whilst we agree that the DIP will need appropriate ongoing governance and funding arrangements (referred to as the DIP Rules) in place for it to deliver the service prescribed by the MHHS programme, we have significant concerns over the lack of clarity of the DIP participants requirements to adhere to the ISO/IEC 27000 'series' standards'. Specifically, regarding the absence of clarity on '<i>the extent that the standards are applicable to their organisation</i>' and absence on DIP guidance on '<i>...which parts of the ISO/IEC2700 series are applicable to...</i>' Network Operators as a...'<i>DIP user</i>'. In the absence of clarity Network Operators are unable to understand the extent they will need to plan, resource and demonstrate readiness for MHHS Qualification by M10.</p> <p>The relevant sections of the lower level draft DIP subsidiary documents requiring clarity as they refer to ISO/IEC 2700 series and ISO 27001 requirements:</p> <ul style="list-style-type: none"> • Section 1 of DSD002 – DIP Connection and Operation • Section 1 of DSD002 – Annex One – DIP On-Boarding Non-Functional Checks • Section 5 of DSD002 – Annex Two – Detailed DIP Operational Requirements • Section 5 of DSD002 – Annex Three – The DIP PKI Policy <p>We request sight of the DIP guidance and amendments to the draft DIP subsidiary documents setting out the specific requirements of the ISO/IEC 2700 series applicable to Network Operators as a DIP User and what evidence a Network Operator would need to be submit in order to qualify for M10. We request confirmation that the scope for MHHS Qualification purposes is:</p> <ul style="list-style-type: none"> • ISO27001 only; • Applies only to the systems that connect directly to the DIP 'i.e. the DIP adaptor'. • Evidence of ISO27001 certification for our DIP adaptor provider for the relevant systems in scope is sufficient and no additional audit evidence is required. <p>This clarity would complement and not contradict the following higher level legal text which solely refers to ISO 27001 requirements:</p>

Respondent	Response	Rationale
		<ul style="list-style-type: none"> Section 3.3.3 of the DIP Supplement which refers to alignment with ISO 27001 Section 12.2.13 of the BSC Section C Section 2.1 of the Interact Code of Connection (DEL1197) document which states: <ul style="list-style-type: none"> '...the level of evidence requested will vary depending on the type of DIP Service User'. '...demonstrating that all applicable ISO/IEC 27001 controls have been applied, where appropriate (where an organisation is ISO27001 certified) <p>The draft BSC legal text and Code of Connection does not refer to the ISO/IEC 27000 series.</p> <p>As currently drafted, and in the absence of any clarity Network Operators are unable to plan, resource and prepare for Qualification adequately in this regard due to the uncertainty in the draft DIP requirements regarding which parts of the ISO/IEC 27000 series are applicable and which systems are in scope.</p>
Stark	Yes	Agree with the stated views against applicable BSC Objectives (c) and (d).
Northern Powergrid Ltd	No	Please see comments below.
National Grid Electricity Distribution	No	<p>There are concerns relating to ISO/IEC 27000 inclusion throughout the 'DIP Rules'. This series is not applicable to all industry parties in all parts, and yet they will be accountable to them due to the wording in these Legal Texts.</p> <p>We have raised these concerns throughout Issue 101 where we sought assurance that alternatives to ISO 27000 would be accepted.</p> <p>The DSDs should explicitly outline which parts of ISO accreditation are necessary, and should include the 'alternative' caveat above. Nothing within a Legal Text should be left open to interpretation by a DIP User, nor by those governing the DIP Users.</p> <p>Clarity of expectations per DIP User category should be in built to these DSDs, and not reliant upon further unratified DIP Manager Guidance. 6.1.3 in Dip Connection and Operation refers to further guidance to that which is applicable</p> <p>The wording relating to the ISO 27000 series and which areas are applicable to Network Operators</p>

Respondent	Response	Rationale
		<p>as a DIP User should be refined to provide clarity. We would suggest the following;</p> <ul style="list-style-type: none"> • ISO27001 only (alternatives & adherence to ISO will be considered) • Applicability to those systems which connect to the DIP directly <p>Evidence of ISO27001 certification from DIP Adapter providers is accepted as evidence due to the systems which are in scope of connectivity.</p>
MHHS Programme	Yes	This change will support the data exchange that supports the new MHHS arrangements
Scottish and Southern Electricity Networks	No	<p>SSEN is supportive of the requirement to have governance arrangements in place for the DIP however reference to ISO/IEC 27000 in the legal text and supporting documents give cause for concern as not all series may not apply to industry parties. This would result in a regulatory obligation and would have a significant impact.</p> <p>SSEN would like to see clear wording relating to the SO/IEC 27000 series and how this relates to Network Operators.</p> <p>A more appropriate approach would be the following</p> <ul style="list-style-type: none"> • ISO27001 only. • That this applies only to systems that connect directly to the DIP, in our case our DIP adapter. • Evidence of ISO27001 certification for our DIP adaptor provider for the relevant systems in scope is sufficient and no additional audit evidence is required. <p>Further clarification is essential in this proposal to ensure no additional costs and resource constraints are put on the MHHS programme and the ability to meet M10.</p>
UK Power Networks	No	<p>UK Power Networks require clarity to confirm our assumptions:</p> <ul style="list-style-type: none"> • Only those system(s) that are connected directly to the DIP (for UK Power Networks, this is the Swim SOAK DIP Adapter) are required to be ISO27001 certified. • Any evidence of certification will come from the Swim SOAK DIP adapter provider (C&C) and no additional audit evidence is required from UK Power Networks.

Respondent	Response	Rationale
		<ul style="list-style-type: none"> As a DIP user (via the DIP adaptor), UK Power Networks will only be required to provide assurance of compliance as laid out in section 2.1 of the Interface Code of Connections. <p>To avoid ambiguity, this needs to be expressly written into the Change Proposal / Code drafting.</p> <p>To confirm, UK Power Networks have procured the C&C Swim SOAK DIP adaptor service which is ISO27001 certified.</p> <p>Should there be any requirement for UK Power Networks to become ISO 27000 certified in whole or part, for qualification, this poses a significant risk to M10 (Central Systems Ready for Migration).</p>
RECCo	No	<p>RECCo fully supports the development and implementation of the DIP as a key component of the new MHHS arrangements and the realisation of the benefits that this will bring for consumers. We have engaged constructively in the development of the proposals that were consulted on as part of Issue 101. We look forward to working with the DIP Manager and DCAB to support the implementation and operation of the DIP Rules.</p> <p>We consider that there are several material issues with the proposed governance approach for the DIP Rules, set out in our response below. Ideally these should be addressed before P474 is approved or, if this is not possible, ahead of M8/M10 when the new MHHS arrangements move into live operation.</p>

Question 2: Do you agree with the Panel that the redlined changes to the BSC deliver the intention of P474?

Summary

Yes	No	Neutral/No Comment	Other
4	7	2	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	-
British Gas	-	See legal text comments.
Scottish Power Energy Networks	No	<p>As per response to Question 1, the current DIP Documentation (including Legal Text) does not provide the clarity required in relation ISO 27000/1 to allow us to plan or resource for MHHS Qualification, as in the first instance we cannot identify which systems are in scope until further clarification is provided.</p> <p>We note that document 'DIP Connection and Operation' seeks to place different obligations on parties as per extract below, however, are not aware of any published documentation as per 6.1.3 that provides this guidance and allows for DNO (or any other party) to have clarity on which areas are applicable/not applicable. As it currently stands our interpretation is that without this documentation all serials are included as a default position</p>
Electricity North West Limited	No	<p>As noted in our response to Question 1, the current DIP Subsidiary Document text which underpins the DIP Supplement document (including in the Legal Text drafting) does not provide a sufficient level of clarity and expands the requirements of the BSC legal text.</p> <p>Section C of the BSC section 12.2.13 defines MHHS ISMS</p> <p><i>"MHHS ISMS" means the information security management system arrangements put in place to ensure MHHS Implementation compliance with ISO 27001, or equivalent."</i></p> <p>In the Data Integration Platform Supplement section 3.3.3, the text states</p> <p><i>"Without prejudice to chapter 1 of this DIP Supplement, the DIP Manager shall review and, where relevant, update all relevant requirements</i></p>

Respondent	Response	Rationale
		<p><i>relating to information security, in order to ensure it remains aligned to ISO 27001”.</i></p> <p>The DIP Subsidiary Document DIP Connection and Operation DSD002 places different obligations on parties.</p> <p><i>“DIP Participants shall, as a minimum, adhere to the requirements of the ISO/IEC 27000 series standards to the extent that the standards are applicable to their organisation.</i></p> <p><i>For clarity, if parts of the ISO/IEC 27000 series are not applicable to a DIP Participant then they are not required to meet those standards. But where something within a standard is applicable, they are expected to meet that requirement and their ISMS shall be set-up and/or operated in the same way as expected in the ISO/IEC 27000 series.</i></p> <p><i>The DIP Manager shall provide guidance on which parts of the ISO/IEC27000 series are applicable to DIP Users.”</i></p> <p>At present, the requirements set out vary between “align with ISO27001”, “adhere to the requirements of the ISO/IEC 27000 series standards but not required to meet those standards if not applicable” and, comply with the obligations where the DIP manager provides <i>guidance on which parts of the ISO/IEC27000 series are applicable to DIP Users.”</i></p> <p>As currently drafted, and in the absence of any clarity Network Operators are unable to plan, resource and prepare for MHHS Qualification adequately in this regard due to the uncertainty in the draft DIP requirements regarding which parts of the ISO/IEC 27000 series are applicable and which systems are in the scope.</p>
Stark	Yes	<p>The intention of this modification was to provide clarity to the industry of the requirements & obligations for DIP Managers & DIP Users and enable enduring operation of the DIP.</p> <p>We agree that the redlined changes to the BSC, allowing for the governance, funding and operation of the DIP, deliver this intention.</p>
Northern Powergrid Ltd	No	<p>It is unclear what ISO/IEC 27000 series requirements apply to which organisations.</p> <p>We believe that the LDSO requirements are restricted but require further clarity.</p> <p>Can you please confirm that for Qualification purposes, the scope for LDSOs is restricted to enable us to be programme ready by M10:</p> <ul style="list-style-type: none"> • ISO27001 only;

Respondent	Response	Rationale
		<ul style="list-style-type: none"> That only systems that connect directly to the DIP only i.e. the DIP Adapter; That evidence of certification from our DIP adapter provider C&C is sufficient. <p>Without this clarification, LDSOs may be unable to adequately resource and prepare for Qualification and M10.</p>
National Grid Electricity Distribution	No	Please refer to response to Question 1.
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	No	Please refer to SSEN's response to question 1 the current documentation does not provide enough detail or clarity on Networks Operators obligations re ISO27000
UK Power Networks	No	<p>Please refer to answer to Q1.</p> <p>In addition, UK Power Networks site an absence of clarity, meaning we are unable to plan, resource and prepare for MHHS Qualification adequately due to the uncertainty in the draft DIP requirements regarding which parts of the ISO/IEC 27000 series are applicable and which systems are in scope. Noting UK Power Networks believe the scope is limited to the DIP Adapter only.</p> <p>Also refer to Section 4.</p>
RECCo	No	<p>There are two main areas described in our response below where we are concerned that the red line changes to the BSC (including the DIP Supplement) do not deliver the intent of P474. Note that our key concerns with the DSDs are set out in our response to Question 3:</p> <p>1. Application of BSC Modification Rules to the DIP Supplement</p> <p>We do not support the inclusion of the DIP Supplement within the scope of the BSC Modification Rules. This is a change to proposals presented in the Issue 101 report, which clearly captured the DIP Supplement within the scope of the DIP CR process. Including the DIP Supplement within the scope of the BSC Modification Rules creates a dual governance risk; moves away from the principle of DIP governance independence and portability; and fundamentally changes the rights of DIP Users and other interested parties that are not BSC Parties, for example by removing rights of appeal.</p>

Respondent	Response	Rationale
		<p>The principle of governance separation from the BSC Panel was subject to two consultations and was clearly agreed by industry following signalling from Ofgem that this was the desired approach.</p> <p>We note the reference in the P474 Modification Proposal to Ofgem requesting amendments to the legal text in order to avoid making changes to the National Grid ESO's electricity Transmission Licence. In responding to this request, we are concerned that alternative approaches, that would have lessened the impacts, and been more in keeping with the agreed principles, have not been adequately developed and discussed with impacted parties. For example, it is not clear why all material content from the DIP Supplement has not been moved into the DSDs. Such an approach would better mitigate the risks noted below and would have more closely matched the industry developed and agreed governance model.</p> <p>For context, the DIP Supplement contains material provisions for the operation of the DIP Rules. For example, it includes the DIP Relevant Objectives, the Categories of DIP Users, DCAB membership, elections and term, data protection and confidentiality provisions, DIP CR implementation arrangements, cost recovery, requirements on all DIP Users to onboard to the DIP prior to accessing the service etc.</p> <p>We have summarised our concerns below:</p> <ul style="list-style-type: none"> • Throughout discussions on Issue 101 it was clear that a separate governance body was required to recognise that the DIP User community are not covered by the BSC Panel representation. For example, the DCAB includes representation from MEMs who are not involved in BSC governance, and we do not believe that Data Services are represented on the BSC Panel. In addition, RECCo has representation on the DCAB, both as a DIP User (through EES) and as a code body, given REC Qualification includes a requirement on Suppliers, LDSOs and MEMs to be DIP Users. However, RECCo is not represented on the BSC Panel so would have no role in decision making regarding the DIP Supplement under the revised approach. A sufficient justification for amending this principle at this late stage has not been provided.

Respondent	Response	Rationale
		<ul style="list-style-type: none"> • Any change to the DIP Supplement will now be assessed against the Relevant Objectives of the BSC rather than the Relevant Objectives of the DIP. We are concerned that this will prevent the DIP from being developed in the way intended. For example, there may be a use case / proposal to expand the scope of the DIP beyond electricity settlement, or the electricity market itself, that the BSC Panel is unable to accept based on BSC Objectives. The principle of changes not requiring BSC Panel approval in any way (including BSC Panel ratification) was agreed through the Ofgem decision to make Elexon responsible for managing the DIP and establishing Issue 101 to define the new governance arrangements to enable future portability: <u>Decision on the governance, funding and operation of an Event Driven Architecture for Market-Wide Half-Hourly Settlement Ofgem</u>. See in particular paragraphs 3.17 and 4.11. This principle was also restated on the front page of the Issue 101 report to Ofgem. • There are material differences in the BSC Modification Rules which restrict the role of DIP Users that are not BSC Parties. <ul style="list-style-type: none"> • The rights of appeal of DIP Users that are not BSC Parties are materially reduced from the Issue 101 proposal. The original intent was for all DIP Manager decisions on DIP CRs (including changes to the DIP Supplement) to be appealable to DCAB. DCAB decisions would be appealable to the Authority. Under P474, our understanding is that DIP Users that are not DIP Parties do not have appeal rights against BSC Panel decisions and the rights to appeal against an Authority decision to approve/reject a proposal are constrained. We do not consider this to be an acceptable position. • Unlike the proposal set out in the Issue 101 report, the BSC Modification Rules do not permit

Respondent	Response	Rationale
		<p>any person to raise a change to the DIP Supplement, and</p> <ul style="list-style-type: none"> The views of DIP Users are not sought on a BSC Modification that impacts the DIP Supplement. Instead, the views of DIP Manager and/or DCAB are requested as a proxy. There is drafting overlap between the DIP Supplement and the DSDs. Where a proposal requires a change to both the DIP Supplement and the DSDs, dual governance creates a risk of confusion, inefficiency in having to run two change processes and potential for conflict between the decisions made by the BSC Panel (in relation to the DIP Supplement) and DCAB (in relation to the DSDs) given their differing Code Objectives. Some non-exhaustive examples of duplicative requirements between the DIP Supplement and the DSDs include: <ul style="list-style-type: none"> DCAB Membership – DIP Supplement para 2.2.1 and DSD001 para 4.3.1, and DCAB Quoracy and Voting – DIP Supplement paras 2.6.1 and 2.8.1 and DSD001 4.8.3 and 4.8.2. <p>Notwithstanding our first preference that all material content is moved to the DSDs, we propose that, where there is an overlap, the detail is removed from the DIP Supplement and retained in the DSDs to ensure the original principles can be applied to these rules.</p> <p>2. Assurance of DIP Rules</p> <p>We do not support the proposal for a DIP User, that is also a Party to an Industry Code (e.g. the REC), to be subject to the performance assurance requirements of that Industry Code should there be a breach of the DIP Rules. This is proposed in DIP Supplement para 1.5.5 and DSD003 para 4.13.</p> <p>There are currently no provisions under the REC that require a party to comply with the DIP Rules and therefore no rights under the REC for action to be taken for non-compliance with the DIP Rules. The REC arrangements for MHHS (developed through industry consultation and now going through the MHHS Programme Consistency Check</p>

Respondent	Response	Rationale
		<p>Consultation ahead of M6 approval by CCAG at the end August) require that REC Parties complete DIP Testing and become a DIP User in accordance with the DIP Rules. Under these arrangements, a REC Party would only be in breach in the event they are suspended or removed as a DIP User.</p> <p>We note that new provisions could be added to the REC to require assurance of the DIP Rules to fall within its scope. However, such an approach should be avoided as it would create confusion on assurance arrangements between the DIP Rules and creates a risk of double jeopardy which would be unreasonable and would expose RECCo to a risk of challenge if we sought to impost a Performance Assurance Technique (PAT) for something that should more appropriately be dealt with under the DIP Rules.</p> <p>We note that the DIP Rules (DSD003) set out the assurance arrangements and consequences of non-compliance so these should be followed in the event of a breach rather than relying on the REC governance.</p> <p>We propose that the DIP Supplement para 1.5.5 and DSD003 para 4.1.3 are amended so it is clear that any assurance with the DSDs is a matter for the DIP Manager as described in DSD003.</p> <p>We request confirmation on whether the DIP Manager or BSC PAB are responsible for performance assurance against the DIP Supplement to avoid the potential for dual governance. There may be confusion on the role of the BSC PAB as the DIP Supplement is part of the BSC and subject to the BSC Modification rules.</p>

Question 3: Do you agree with the Panel that the draft subsidiary documents deliver the intention of P474?

Summary

Yes	No	Neutral/No Comment	Other
4	8	1	0

Responses

Respondent	Response	Rationale
IMServ Europe	No	See below comments on various of the DSD documents
British Gas	Yes	-
Scottish Power Energy Networks	No	Refer to response to Questions 1 & 2
Electricity North West Limited	No	Please see our answer to Q1 and Q2.
Stark	Yes	The requirements for the DIP Manager & DIP Users are clearly defined and set out by these documents
Northern Powergrid Ltd	No	As above we require further clarification on the detail of the ISO/IEC 27000 series requirements.
National Grid Electricity Distribution	No	Please refer to response to Question 1.
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	No	Refer to response to Questions 1 & 2
UK Power Networks	No	Refer to Q1 & Q2 answers. Also refer to Section 5.
RECCo	No	<p>There are two areas where we are concerned that the DSDs do not deliver the intent of P474. These are described below:</p> <p>1. Missing DSD Requirements</p> <p>Requirements identified in the baselined MHHS Design have not been captured in the draft DIP Rules. Missing requirements have been highlighted through a traceability exercise published by the MHHS Programme. In this traceability exercise, the gaps are acknowledged with the expectation that</p>

Respondent	Response	Rationale
		<p>the DIP Manager will incorporate the missing requirements in Autumn 2024. The missing requirements cover important areas, for example on volumetrics and service management.</p> <p>We understand that the intention is for the DIP Manager to use the new DIP Change Management rules to implement the missing MHHS Design requirements. As this is a new process, this approach carries a risk that the missing requirements are not implemented ahead of M8/M10, or not at all as parties may seek to reject or amend the MHHS Design requirements.</p> <p>Given the proposed change to the governance rules for the DIP Supplement, there is also a risk that a BSC Modification would be needed in addition to a change to the DIP Subsidiary Documents. This dual governance approach would cause additional complexity in capturing the missing requirements.</p> <p>All DIP requirements should be captured in P474 before it is approved. If the missing requirements are not added to the DIP Rules via P474, we would welcome assurances that Ofgem will closely monitor the progress of any required DIP CR to ensure that the MHHS design has been fully transcribed into the DIP Rules for M8/M10.</p> <p>We further note that MHHS Programme has recently proposed a change to the DIP Interface Code of Connection: Interface Code of Connection and PKI Policy page on the MHHS website which is a baselined MHHS design artefact. If agreed, this change would also need to be captured into DSD002-A2. We welcome assurances that proposed changes to the MHHS Design ahead of M8/M10 will carefully consider how these are implemented into the DIP Rules to avoid a situation where parties are working to the MHHS Design but are not compliant with the DIP Rules.</p> <p>2. Scope of DIP Change process</p> <p>As described in DSD004 para 1.1.1, the scope of the DIP Change process covers both the 'DIP' and the 'DIP Rules'.</p> <p>The implication of the drafting is that a change to the DIP, where this does not impact the DIP Rules, will require a DIP CR. We do not understand the intent of this requirement and how it is expected to work in practice. Parties do not have sight of the DIP contractual requirements and therefore will not</p>

Respondent	Response	Rationale
		<p>be able to request changes to the DIP outside of service provisions documented within the DIP Rules.</p> <p>The DIP Rules should set out the relevant requirements for the DIP Service Provider and parties should be able to raise changes to the DIP Rules to amend, add and remove DIP Service Provider requirements. Separate to this, the DIP Manager may request changes to the DIP that do not impact functionality described in the DIP Rules. Any such changes would be progressed bilaterally and not require a DIP CR.</p> <p>We note and support the arrangements described in DSD004 para 2.13 which provide for a standalone process to manage changes to the DIP messages. However, we are concerned by, and do not understand the justification for, the requirement set out in DSD004 para 2.3.2 which requires an Industry Code to raise a complementary DIP CR where a REC change requires a change to the DIP (not the DIP Rules). Our view is that it would be for the DIP Manager to take forward any required changes to the DIP Service Provider contract which are required as a consequence of either a change to the DIP Rules or a change to another Industry Code which impacts the DIP e.g. the introduction of a new DIP message.</p> <p>There are several references in DSD004 to changes to the 'DIP legal text' as being something different to a change to the DSDs. The term 'DIP legal text' is not defined and it is not clear if this is intended to refer to the DIP Service Provider contract or something else. DSD004 para 2.7.2 refers to this 'DIP legal text' needing to be in the DIP CR. All relevant requirements should be defined in the DIP Rules, and we would welcome confirmation of the scope of the DIP legal text and the requirement to use the DIP CR process to amend it.</p>

Question 4: Do you agree with the Panel's recommended Implementation Date?

Summary

Yes	No	Neutral/No Comment	Other
5	6	2	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	-
British Gas	Yes	-
Scottish Power Energy Networks	No	<p>We cannot support the implementation date given the uncertainty surrounding the ISO27000 requirements for industry parties as users of the DIP.</p> <p>This has impacts for MHHS Qualification and ongoing BSC Audits, there will be a requirement to provide documentation to support this and without clear definitions of the applicable serials this would be a significant amount of work.</p>
Electricity North West Limited	No	<p>As noted in the response to Q1 and Q2, there is significant uncertainty regarding what ISO requirements are being placed upon DIP Users. This uncertainty on the parts of the ISO 2700 series which are applicable and the scope of systems - impacts Network Operators both as a MHHS Party Participant planning regarding readiness for MHHS Qualification and as BSC Party with ongoing audit testing (i.e. which standards/elements of standards are being tested) and scope of any associated DIP Manager guidance.</p> <p>If Network Operators are required to undertake and demonstrate additional ISO certification by external assessors (beyond ISO27001 certification from its DIP adaptor provider for the connection to the DIP) then this will take time to schedule, produce documentation and verify to the applicable standards. There would need to be a significant gap between approval and implementation to allow Network Operators time to comply (and demonstrate compliance) with the obligations ahead of the DIP go live in April 2025 (M10).</p>
Stark	Yes	-

Respondent	Response	Rationale
Northern Powergrid Ltd	No	Further detail/clarification is required before we can comment on the implementation date. If we are required to complete additional ISO 27000 series certification, additional timescales will be required to undertake and demonstrate compliance.
National Grid Electricity Distribution	No	Whilst it is imperative that DIP Rules are in place for DIP on-boarding, if they are not fully fleshed out (i.e. DIP guidance to follow) it is inappropriate to implement them.
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	No	SSEN does not support the implementation date as the requirements are not clear. Also, no guidance has been issued re 6.1.3 of the ISMS Standards and Obligations.
UK Power Networks	No	Refer to Q1 & Q2 answers. However, if updates are made to the Change Proposal / Code drafting such that ambiguity is removed and it is clear that UK Power Networks do not need to become ISO27000 (or sub part) compliant, then we would accept that the recommended implementation date is achievable.
RECCo	Neutral	It is not clear why P474 is being implemented ahead of M8/10 or why there wasn't time to engage with industry on the significant and material changes to the original proposal developed under Issue 101 ahead of taking this modification proposal forward.

Question 5: Do you agree with the Panel's initial consideration that P474 does impact the European Electricity Balancing Guideline (EBGL) Article 18 terms and conditions held within the BSC?

Summary

Yes	No	Neutral/No Comment	Other
5	0	8	0

Responses

Respondent	Response	Rationale
IMServ Europe	Yes	-
British Gas	Yes	-
Scottish Power Energy Networks	-	-
Electricity North West Limited	-	-
Stark	Yes	-
Northern Powergrid Ltd	-	-
National Grid Electricity Distribution	-	No comments
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	-	-
UK Power Networks	-	No comments
RECCo	N/A	N/A

Question 6: Do you have any comments on the impact of P474 on the EBGL objectives?

Summary

Yes	No	Neutral/No Comment	Other
0	5	8	0

Responses

Respondent	Response	Rationale
IMServ Europe	No	-
British Gas	No	-
Scottish Power Energy Networks	-	-
Electricity North West Limited	-	-
Stark	No	-
Northern Powergrid Ltd	-	-
National Grid Electricity Distribution	-	No comments
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	-	-
UK Power Networks	-	No comments
RECCo	N/A	N/A

Question 7: Will P474 impact your organisation?

Summary

High	Medium	Low	None	Other
8	1	1	1	2

Responses

Respondent	Response	Rationale
IMServ Europe	Low/None	All costs to develop systems, processes and knowledge base to support the use of the DIP have already been incurred during our preparations for MHHS SIT and Qualification, however we are unable to ascertain whether any further work is required pending a response to the comments we raise below regarding DSD002.
British Gas	Medium	-
Scottish Power Energy Networks	High	In accordance with the current document drafting, we have assessed the impact as High, on the basis that as a Network Operator we are required to be a DIP user and comply with the rules as written. In the absence of the lower-level detail of the required relevant serials relating to ISO27000, as written this means we are obliged to comply with them in their entirety. This places significant uncertainty on the requirements and risk on delivery of milestones for M10.
Electricity North West Limited	High	Based on the current proposal legal and subsidiary document drafting and as a Network Operators who is required to be a DIP User and adhere to the DIP Rules we could incur significant and material resource and cost impacts to comply with a undefined ISO27001 series (which includes 30-40 standards).. As noted in our response to Q2, the level of impact is highly dependent upon the specific ISO certification we are required to hold and evidence during MHHS Qualification and for ongoing annual audit requirements. At present, the drafting places significant uncertainty and risk on Network Operators and our ability to be programme ready for M10.
Stark	-	Any organisational impact of P474 is related to the requirements for MHHS qualification and the subsequent additional obligations as a DIP User.

Respondent	Response	Rationale
Northern Powergrid Ltd	High	As drafted currently, significant activity would be required by LDSOs to meet the ISO 27000 series certification, which could impact our readiness for M10.
National Grid Electricity Distribution	High	In current format it is not possible to comply with incomplete and unclear rules. We need sight of the further guidance and clarity on ISO 27000.
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	High	The current document drafting will have a high impact if parties must comply with ISO27000 and the relevant series and may have an impact on the delivery of the M10 milestone for MHHS.
UK Power Networks	-	Unable to answer – UK Power Networks will carry out a detailed impact assessment once clarification is received as to the scope of any ISO27000 certification requirements. Our assumptions are stated in Q1. Clarification is requested to enable us to progress. Once known, an assessment of time, costs and risks to M10 can be provided.
RECCo	High	<p>RECCo is a DIP User (in relation to the Electricity Enquiry Service) and will therefore be required to comply with the DIP Rules and engage within the DIP governance arrangements. Furthermore, the DIP delivers a service required to operate critical business processes referenced in the REC. We therefore require the DIP Manager to effectively hold parties to account for the operation of the DIP Rules.</p> <p>The interconnected nature of the business processes developed for MHHS means that we require the DIP Rules to have an effective change management arrangement that supports the development of REC Change Proposals.</p> <p>REC Parties are required to become DIP Users and therefore require DIP accession and onboarding arrangements to work smoothly and support REC Party Qualification.</p> <p>As we have been engaging throughout the Issue 101 and P474 processes, we have already reviewed the requirements to ensure these can be met by our service providers. Therefore, we are not expecting any significant impacts post approval.</p>

Question 8: How much will it cost your organisation to implement P474?

Summary

High	Medium	Low	None	Other
3	1	0	1	8

Responses

Respondent	Response	Rationale
IMServ Europe	Not known	See above response
British Gas	-	The cost of interacting with the DIP is incorporated in our overall MHHS budget
Scottish Power Energy Networks	High	We are unable to provide a cost for this given the uncertainty of the requirements associated with the ISO27000 issue. We require the relevant series to be defined for clarity and to allow an impact assessment to be made. If the current drafting is retained, the work required to implement this would be significant.
Electricity North West Limited	High	Due to the level of uncertainty around the ISO requirements, we cannot place an accurate cost on the business for the implementation, onboarding and delivery of P474. Potential ROM costs include engaging certification bodies, drafting of new/updated processes to meet the requirements of ISO27000 series , redesign of systems and reporting processes etc.
Stark	-	-
Northern Powergrid Ltd	-	Due to the lack of clarity regarding requirements, we are unable to calculate a cost at this time. Should certification of the full ISO 27000 series be required, we expect additional costs to be high.
National Grid Electricity Distribution	-	Unable to provide costings due to above uncertainties
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	High	If the requirements remain as they are this could introduce significant costs which SSEN is unable to quantify currently.

Respondent	Response	Rationale
UK Power Networks	-	Unable to answer – UK Power Networks will carry out a detailed impact assessment once clarification is received as to the scope of any ISO27000 certification requirements. Our assumptions are stated in Q1. Clarification is requested to enable us to progress. Once known, an assessment of time, costs and risks to M10 can be provided.
RECCo	Medium £100k - £200k	We originally did not expect significant cost in implementing the DIP rules. However, the significant nature of the changes made to the agreed solution will impact our assumptions on the impact to REC governance and operational readiness preparation. There will now be increased effort in assessing the impacts to the REC and mitigating against the risks we have highlighted in this response.

Question 9: What will the ongoing cost of P474 be to your organisation?

Summary

High	Medium	Low	None	Other
0	4	0	1	8

Responses

Respondent	Response	Rationale
IMServ Europe	-	-
British Gas	-	Unknown
Scottish Power Energy Networks	Medium	We are unable to quantify the costs currently, again this points to the issue of the relevant ISO27000 series not being included in the change, without this reference we are assuming high costs for maintaining accreditation and for any audit's relation to the DIP (or our use of).
Electricity North West Limited	Medium	The cost is largely dependent upon the audit regime that is put in place and the requirements for compliance with ISO27000 series. Potential ROM costs include resource intensive DIP Audits and requirements to maintain accreditation to ISO27000 series standards and responding to changes to the DIP Manager guidance.
Stark	-	-
Northern Powergrid Ltd	-	Due to the lack of clarity regarding requirements, we are unable to calculate a cost at this time. Should certification of the full ISO 27000 series be required, we expect additional costs to be high.
National Grid Electricity Distribution	-	Unable to provide costings due to above uncertainties
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	Medium	Unable to quantify without further clarification.
UK Power Networks	-	Unable to answer – UK Power Networks will carry out a detailed impact assessment once clarification is received as to the scope of any ISO27000 certification requirements. Our assumptions are stated in Q1. Clarification is requested to enable us

Respondent	Response	Rationale
		to progress. Once known, an assessment of time, costs and risks to M10 can be provided.
RECCo	Medium £100k - £200k	We will need to complete a full impact assessment on the final solution taken forward to fully understanding the enduring costs, once the gaps and concerns highlighted in this response have been addressed.

Question 10: How long (from the point of approval) would you need to implement P474?

Summary

0-6 months	6-12 months	>12 months	Other
2	0	0	11

Responses

Respondent	Response	Rationale
IMServ Europe	Not known	Processes and systems have been developed in advance of P474 however we are unable to ascertain whether any further work is required pending a response to the comments we raise below regarding DSD002.
British Gas	-	-
Scottish Power Energy Networks	-	We are unable to provide a clear view on this as the requirements for the ISO27000 series is not clear.
Electricity North West Limited	Dependent upon the requirements	Please see our response to Q4.
Stark	-	-
Northern Powergrid Ltd	TBC	Further detail/clarification is required before we can comment on the implementation timescales.
National Grid Electricity Distribution	-	Unable to provide due to uncertainties
MHHS Programme	-	N/A
Scottish and Southern Electricity Networks	-	Until the requirements are confirmed SSEN is unable to give a lead time.
UK Power Networks	-	Unable to answer – UK Power Networks will carry out a detailed impact assessment once clarification is received as to the scope of any ISO27000 certification requirements. Our assumptions are stated in Q1. Clarification is requested to enable us to progress. Once known, an assessment of time, costs and risks to M10 can be provided.
RECCo	Minimal (TBC)	RECCo is preparing for MHHS in line with the MHHS Implementation Programme. As part of this

Respondent	Response	Rationale
		<p>activity, we are engaging with the DIP Manager to ensure operational readiness.</p> <p>The implementation of P474 ahead of M8/M10 is therefore expected to have limited additional direct impact on RECCo other than the requirement to identify and provide resource to support DCAB meetings and to review DIP Change Proposals ahead of M8/M10.</p> <p>As referenced in Questions 8 and 9, the changes made to the agreed solution in this modification proposal will have a greater impact on RECCo's operational readiness activities ahead of M8/M10.</p>

Question 11: Do you agree with the Proposer's view on the benefits of P474?

Summary

Yes	No	Neutral/No Comment	Other
5	5	3	0

Responses

Respondent	Response	Rationale
IMServ Europe	-	-
British Gas	Yes	-
Scottish Power Energy Networks	No	<p>Other than the issue previously raised regarding the ISO27000 and relevant serials we are of the view that the overall proposal seeks to introduce areas of governance that we are supportive of.</p> <p>We are supportive of the governance areas that have been proposed in this proposal, however if clarity is not provided on the ISO27000 issue our view is that this would detract from any benefit, as the default position is that all serials apply, and this increases uncertainty and risk for Industry participants particularly in relation to cost.</p>
Electricity North West Limited	No	<p>Whilst there are a number of necessary, efficient and appropriate areas of governance proposed in P474, the lack of clarity (discussed earlier) creates uncertainty regarding cost, resource and risk impacts to Network Operators and lack of a cost benefit impact assessment regarding the benefits, This lack of clarity was raised during the Issue 101 group discussions..</p>
Stark	Yes	Agree with the benefits as summarised in the consultation document.
Northern Powergrid Ltd	No	As above.
National Grid Electricity Distribution	-	Other than the outlined uncertainties – it is necessary for governance
MHHS Programme	-	N/A

Respondent	Response	Rationale
Scottish and Southern Electricity Networks	No	As previously stated SSEN is supportive of governance arrangements but the question around ISO27000 could reduce any benefit realised.
UK Power Networks	No	There is a requirement to have clear and appropriate Governance arrangement in place. However, there is a level of ambiguity which requires clarification (points already raised in Q1 & Q12).
RECCo	Yes	<p>RECCo fully supports the rationale for the DIP and agree the benefits being introduced through a clearly defined set of DIP Rules. We have constructively supported the development of the DIP Rules through Issue 101 and will be working closely with the DIP Manager to support its effective operation from implementation.</p> <p>We are fully supportive of the intent, however we are disappointed that the alternative solution in this modification proposal, developed without consultation with industry parties, harms and dilutes the original benefits envisaged for the DIP, as highlighted in our response to earlier questions.</p>

Question 12: Do you have any further comments on P474?

Summary

Yes	No
10	3

Responses

Respondent	Response	Rationale
IMServ Europe	No	-
British Gas	Yes	<p>We are still concerned that Suppliers are only given minimal representation on the DCAB.</p> <p>We would prefer a model similar to the Smart Energy Code (SEC) Change board where suppliers are well represented.</p> <p>SEC Change Board membership:</p> <ul style="list-style-type: none"> • 1 member from each Large Supplier voting group with one vote each • 3 Small Suppliers • 3 Network Parties • 3 Other SEC Parties • 1 Consumer Representative • DCC and Ofgem • Chaired by SECAS
Scottish Power Energy Networks	Yes	<p>We believe that it is worth noting that the change process for the DIP is via the BSC Panel. DNO's do not have a vote on this panel and therefore are impacted by any changes made by this proposal without being able to input into the final decision.</p>
Electricity North West Limited	Yes	<p>There appears to be a number of issues surrounding the interchangeability of the terms ISO27001 and ISO27000 series. The ISO 27001 is a singular part of the ISO 27000 series and being compliant with both means that you have to be compliant with the full suite of documents under ISO 27000 which creates an unnecessary regulatory burden on DIP Users and a significant cost to customers in absence of a cost benefit analysis We would request a review if the approach is proportionate and targeted based on each DIP Users role.</p> <p>Another concern with the process for assessing the change proposal is the statement the BSC Panel unanimously approved the proposals. Network Operators are not BSC Trading Parties and as such</p>

Respondent	Response	Rationale
		do not have a vote on the BSC Panel but are impacted by this proposal.
Stark	No	-
Northern Powergrid Ltd	Yes	Further detail/clarification is required before we can comment on the implementation timescales.
National Grid Electricity Distribution	No	N/A
MHHS Programme	Yes	<p>The MHHS Programme Code workstream undertook a traceability exercise to ensure all MHHS Design Requirements were mapped to either DIP Manager governance or MHHS Code text. The traceability process relating to the DIP Manager identified 5 minor gaps. There was not enough time to add these amendments to the DIP SCR text, because the traceability process completed after the SCR process had started.</p> <p>Through engagement with the DIP Manager and as per the DIP traceability matrix, it has been agreed these 5 items will be updated to the DIP arrangements through the new DIP Management Governance process in October 24. This will ensure that the DIP Manager arrangements are updated and complete before Central Systems ready for Migration MPANS (M10) MHHS Go-live. For clarity these are existing requirements in the MHHS Design. They are not new requirements. Through the DIP Manager governance process, we understand parties will be engaged and consulted before the DIP arrangements are updated to amend the inconsistencies.</p> <p>For information only. Design clauses to be added to DIP Governance.</p> <ol style="list-style-type: none"> 1. In terms of handling messages all participant systems shall be idempotent and have mechanism for handling duplicate messages 2. When participant systems/services are unavailable from both unplanned and planned outages the outage shall be communicated to the DIP via e-mail or via the DIP portal **to be picked up later when DIP governance procedures are written *** 3. "All Services (see exceptions) shall have capacity to process the following volumes of messages: <ul style="list-style-type: none"> - average daily volume of 66,000

Respondent	Response	Rationale
		<ul style="list-style-type: none"> - peak daily volume of 300,000 - average hourly volume of 2,750 - peak hourly volume of 35,000 - annual volume of 24M" <p>4. "All Services (unless explicitly referenced below) shall have capacity to process the following volumes of messages:</p> <ul style="list-style-type: none"> - peak daily volume of 2,100,000 * portfolio coefficient ¶¶ - peak hourly volume of 2,100,000 * portfolio coefficient ¶¶ - annual volume of 110M * portfolio coefficient ¶¶" <p>5. All services (involved in BP affecting the Secured Active process), shall not plan outages within the Secured Active processing window</p>
Scottish and Southern Electricity Networks	Yes	None at the time of writing.
UK Power Networks	Yes	It is stated that the BSC Panel unanimously approved the proposals. However, it should be noted that although DNOs will be impacted by this proposal (the extent to which will be dependent on the outcome of obtaining clarity of the issues raised), DNOs are not eligible to vote at the BSC Panel (although are represented by a non-voting member).
RECCo	Yes	The successful implementation of the DIP Rules will require cooperation, planning and work between the REC Code Manager, BSC Code Manager and the DIP Manager to operationalise the new arrangements. We are committed to supporting this activity and look forward to continuing to engage with the DIP Code Manager to meet this aim.

Responses

Respondent	Location	Comment
IMServ Europe	-	-
British Gas	Section C 12.15	Refers to Data Collectors & Aggregators qualifying for MHHS - this is obviously wrong. Aggregators do not exist in MHHS, DCs become Data Services
British Gas	Section X-1	Refers to Data Collectors & Aggregators qualifying for MHHS - this is obviously wrong. Aggregators do not exist in MHHS, DCs become Data Services
Scottish Power Energy Networks	-	-
Electricity North West Limited	-	-
Stark	-	-
Northern Powergrid Ltd	-	-
National Grid Electricity Distribution	-	-
MHHS Programme	-	-
Scottish and Southern Electricity Networks	-	-
UK Power Networks	Section C 12.2.13	This section should be amended to make it clearer as to the exact requirements.
RECCo	Section F 1.1.2	We suggest that DIP Users are informed of changes to the BSC where a modification impacts the DIP Supplement.
RECCo	DIP Supplement 3.2.6	Typo. Sentence should start 'DIP Users' or 'A DIP User'.
RECCo	DIP Supplement 5.3.5	This para provides for the DIP Manager to determine 'materiality criteria' that would allow it to approve a DIP CR without DCAB approval. We recommend that these materiality criteria are approved by DCAB rather than simply having their views taken into account. It is important that the

Respondent	Location	Comment
		users of the service have sufficient control of the changes to that service.

Responses

Respondent	Location	Comment
IMServ Europe	DSD002 6.1.3	<p>This clause is too vague and creates an immediate risk for Participants planning to use the DIP.</p> <p>The ISO 2700 series is a large suite of documentation with multiple requirements, each of which typically incurs resource, time and cost to implement.</p> <p>The elements of the 2700 series that are applicable to DIP users should be documented and made available now so that all Qualification participants are aware of these in advance of the start of the Qualification exercise. The method of providing this guidance also needs to be described.</p> <p>The 2700 series is subject to revisions therefore there also needs to be a formal mechanism to implement any changes to this guidance.</p>
IMServ Europe	DSD002 A2 2.1.17/6.3.6	What about other test environments that will be stood up (as per 2.1.12)?
IMServ Europe	DSD002 A2 2.5.2/6.3.4	2.5.2 suggests a participant can use separate certificates for message signing and mtls, whilst 6.3.4 appears to contradict this?
IMServ Europe	DSD002 A2 6.7.1	Should specify how the notification occurs
IMServ Europe	DSD002 A2 8.9.2	How long are messages left on the dead letter queue and is there any mechanism for them to be resent?
IMServ Europe	DSD002 A2 9.12.4	This is not correct. API key pairs are per DIP ID. Please update
IMServ Europe	DSD002 A3 2.2.1	Extraneous characters at the end of (b)
IMServ Europe	DSD002 A3 4.7.3	Delete 'the'
IMServ Europe	DSD004	The DIP will need to be subject to regular updates. Infrastructure updates (even for PaaS services) could introduce breaking changes and DIP software libraries etc will need to be regularly patched and presumably tested as per the NFR requirement of maintaining software. Who will be monitoring for breaking changes introduced by MS? Also, this

Respondent	Location	Comment
		continuous software delivery and lifecycle management falls under which category in 2.1?
IMServ Europe	DSD005 3.1.2	No mention of continuous maintenance of software?
IMServ Europe	DSD005 3.1.2	Should additional test environments be added to this list?
British Gas	-	-
Scottish Power Energy Networks	-	-
Electricity North West Limited	-	-
Stark	-	-
Northern Powergrid Ltd	DSD002 A2 2.2.2	Will market participant user have access to the DIP Service Desk via the user portal to raise incidents?
Northern Powergrid Ltd	DSD002 A2 2.2.2	Which of the market participant user roles will have access to the Admin portal and user portal?
Northern Powergrid Ltd	DSD002 A2 3.3.1	PKI Role Governance - Does the vetting and registration process applicable only for the first certificate admin (i.e., the additional certificate admins will not be going through the vetting process)?
Northern Powergrid Ltd	DSD002 A2 10.5.6	Can multiple MPIDs within the same MPO have the same certificate? Or do each MPID should have its own certificates?
National Grid Electricity Distribution	-	-
MHHS Programme	-	-
Scottish and Southern Electricity Networks	-	-
UK Power Networks	DSD002 6	This section should be amended to make it clearer as to the exact requirements.
UK Power Networks	DSD002 A1 1	This section should be amended to make it clearer as to the exact requirements.
UK Power Networks	DSD002 A2 5	This section should be amended to make it clearer as to the exact requirements.

Respondent	Location	Comment
UK Power Networks	DSD002 A3 5	This section should be amended to make it clearer as to the exact requirements.
RECCo	DSD001 2.1.1	It is not clear why the DIP Applicable Objectives are set out in the DIP Supplement rather than in this DSD. Any change can only be made if this furthers the objectives of the BSC. This is unduly restrictive in allowing the DIP to be developed to meet non-Settlement use cases.
RECCo	DSD001 3.6	We do not understand the purpose of this section as there are no DIP Manager Terms of Reference stated. Will these be developed and implemented through a future DIP CR?
RECCo	DSD001 A1 3.2.1	This section sets out a dual running period where decisions relating to the DIP shall be agreed by the DIP Manager and the MHHSP, with the MHHSP having primacy. Please confirm that the scope of this provision excludes changes to the DIP Rules. We think this is the intent of 3.1.4, but it is not explicitly stated.
RECCo	DSD001 A1 3.2.2	Please confirm that the intent of this paragraph is to have the DCAB in place six weeks ahead of the proposed implementation date of 1 October, i.e. by mid August. If this is correct, we welcome further information on when requests for DCAB membership nominations will be published.
RECCo	DSD001 A1 3.3	In this section the terminology switches between SIT and MHHS SIT. The terminology also switches between MHHS Qualification and Qualification. Our assumption is that is a drafting error and a single set of terms should be used consistently in this section.
RECCo	DSD002 4.3.2 i)	We are not clear why a failed supplier, that has had its licence removed by Ofgem as part of the SoLR process, should be permitted to continue to have access to the DIP. As drafted, such access is granted if the failed supplier 'requires it' without consideration of the risks or controls that should be in place.
	DSD002 5.3.1	Typo – Last sentence refers to 'that paragraph amended' but it is not clear which paragraph is being referred to.
	DSD002 6.1.4	Typo – start sub paras with 'a' rather than 'c'.
	DSD002 6	This section requires DIP Users to comply with the sections of the ISO/IEC 27000 series as applicable to their organisation.

Respondent	Location	Comment
		<p>There is a requirement for the DIP Manager to provide guidance on which parts of the ISO/IEC 27000 are applicable. We consider that parties should have access to this guidance so that they can fully understand their requirements before they can enter into Access Agreements. We understand that this guidance is expected to be published shortly.</p> <p>This guidance should be subject to consultation, with updates being appealable and have a mechanism for impacted parties to raise changes/or an annual review so that it remains appropriate and proportionate.</p>
	DSD003 3.1.1	<p>This paragraph creates an expectation that DSD003 will list the reports to be generated. However, a list of reports is not provided. Para 3.1.4 provides some 'examples' of DIP reports that 'may' be provided but does not match the perceived intent of para 3.1.1.</p>
	DSD003 3.3.1	<p>This paragraph sets out the instances where the DIP manager shall disclose the content of DIP Messages. There are four individual circumstances (as indicated by the 'or' at the end of sub-clause c). We welcome confirmation that the intent of this section is that any party can have access to the data if they have controls in place <u>or</u> are willing to be audited. We suggest that further consideration is given to the arrangements for data provision, e.g. whether the party must have controls in place and be willing to be audited.</p>
	DSD003 4.1.3	<p>For the reasons set out in our response to Question 2 we do not agree that non-compliance with the DIP Rules is a performance assurance matter under the REC.</p> <p>Suggest that this is amended to clarify that, if as part of its activity, the DIP Manager identifies a potential non-compliance with another Industry Code, it shall notify that Industry Code and provide all necessary information to allow that potential non-compliance to be investigated.</p>
	DSD004 General	<p>As noted above, we are concerned that the change process is being used to decide contractual matters that are outside of the scope of the DIP Rules and which parties do not have sight of.</p> <p>Suggest removing references to the scope DIP CR process including the 'DIP' so that it is clear that it is only applicable to changes to the DIP Rules.</p>

Respondent	Location	Comment
	DSD004 2.1.4	We propose that the decision of the DIP Manager to determine a DIP CR to be Tier 2 should be appealable to DCAB.
	DSD004 2.1.5 b)	Suggest that the scope of this sub-clause is extended so that a DIP CR is considered to be material (and therefore requiring DCAB approval) where it would <u>amend</u> an existing obligation. Currently, the clause only refers DCAB approval of new obligations.
	DSD004 2.3.2	As set out in our response to Question 3, we do not agree that an Industry Code such as the REC should be required to raise a DIP CR where a REC CP requires a change to the DIP. As management of the DIP is a contractual matter, we would expect the DIP Manager to contribute any REC Change Management Impact Assessment request and identify DIP impacts. If the REC CP is agreed, we would expect the DIP Manager to make all necessary changes to the DIP to implement that change. Where there a change to the DIP Rules are identified, we would expect this to be progressed in accordance with the arrangements set out in the CCSG (as set out in para 2.6.4).
	DSD004 2.4.3 k)	Typo – refers to ‘core DIP services’. Suggest using the defined term ‘DIP Core Services’.
	DSD004 2.6.1	DIP Manager should be required to set out the criteria that it shall use to determine whether not to consult on a DIP CR. In developing such criteria, the DIP Manager should take into account the views of DIP Users. The criteria should also be approved by DCAB. Where criteria are not in place, the default position should be to consult.
	DSD004 2.7.2	Refers to a change to the ‘DIP legal text or DSDs’. As noted above, we are not clear what is meant by DIP legal text.
	DSD004 2.9.1 and 2.9.4	These paragraph sets out obligations on the BSC Panel. Please confirm that the BSC Panel is subject to the provisions described in the DSDs. If not, these provisions should be moved to the BSC Section F and cross references added to the DSD to assist parties in following the end-to-end process.
	DSD004 2.13.4	We welcome the provisions that set out arrangements for amending the DIP Flows. However, we are unclear what is intended by the reference in this para to a decision being treated in the same way as a DIP System only change. In accordance with para 2.15.5, this may require a

Respondent	Location	Comment
		DIP CR and appears to contradict the intent of section 2.13 which would require the DIP to be updated as necessary to implement the DIP Flow changes outside of the DIP CR process.
	DSD006 3.2.3	This paragraph requires the DIP Manager to seek the advice/permission from the owner of data/Mata Data prior to release. In relation to Data Items and DIP Messages, please confirm that DIP Manager will reference the Energy Market Data Specification to identify ownership.
	DSD007 Section 2 – Access Agreement	It is not clear what is meant by the DIP User being 'bound by the DIP'. Suggest that this is amended to 'bound by the DIP Rules'
	DSD007 Section 2 – DIP Change	As noted above, we are concerned that the change process is being used to decide contractual matters that are outside of the scope of the DIP Rules and which parties do not have sight of. Suggest removing 'and/or the DIP'.