



Conclusions

On the Revised Delivery Plan for Continuation of Data Services (DSP)

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Table of Contents

1. Introduction and Context	2
1.1. Background	2
1.2. Consultation Questions and Respondents.....	3
1.3. Responses.....	4
2. Questions – feedback and DCC conclusions.....	5
2.1. Planning /question 1 & 2	5
2.1.1. Question 1.....	5
2.1.2. Question 2.....	7
2.2. Delivery Plan Activities to Contract Award /question 3.....	8
2.2.1. Question 3.....	9
2.3. Delivery Plan Activities post Contract Award /question 4, 5 and 6	10
2.3.1. Question 4.....	10
2.3.2. Question 5.....	12
2.3.3. Question 6.....	14
2.4. Plan interactions with other DCC and Industry Change /question 7 ..	15
2.4.1. Question 7	15
2.5. Dependencies and Assumptions / question 8.....	16
2.5.1. Question 8.....	16
2.6. Risks and Opportunities /question 9	17
2.6.1. Question 9	17
2.7. Customer Journey and Engagement /question 10 & 11.....	18
2.7.1. Question 10	18
2.7.2. Question 11	19
3. Changes to the Plan	20
4. Next Steps.....	22
Appendix A – Plan on a Page (DSP)	23
Appendix A – Plan on a Page (DSP SI).....	24
Appendix A – Plan on a Page (FSM).....	25
Appendix B – Licence Condition 13B Milestone Table.....	26

1. Introduction and Context

1. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single, secure, digital network. DCC supports the roll-out and operation of second-generation (SMETS2) smart meters, as well as the migration and operation of existing first-generation (SMETS1) meters onto our network.

1.1. Background

2. The Data Systems Provider (DSP) and other services delivered under the data services contract sit right at the heart of the Smart Metering infrastructure. It provides data services that connect DCC Users (network operators, energy suppliers and others) to devices at their consumers' premises. This flow of messages between consumer premises and DCC users enables critical functions to take place such as prepayment meter top-up, and allows for the collection of data needed in energy supplier billing/settlement or for other industry-wide innovative purposes.
3. The DSP's architecture and service contract were originally procured and negotiated by the Department for Energy and Climate Change (DECC), now the Department for Energy Security and Net Zero - abbreviated to DESNZ throughout this document, during the initiation of the Smart Metering Programme between 2009 and 2013. The initial contract term was for 8 years from September 2013 to October 2021 and continues for a 3-year extension period up to October 2024.
4. The DCC plan for DSP ensures that services are continued in a way that minimises risk to continuity of the service and the security of smart metering and doing so in an economic and efficient manner.
5. DCC consulted on its original plan for delivery of the DSP service continuity in September 2021 and concluded our findings in February 2022, with appropriate plan milestones being added to the JIP shortly after.
6. DCC was directed by the Secretary of State on 26th July 2023 (under Conditions 13B of its Licence) to undertake a replanning exercise for DSP. This consultation¹ ran between the 9th November 2023 and the 15th December 2023. DCC held a customer webinar on the 1st December 2023 to support stakeholders with responses.

¹ <https://www.smartdcc.co.uk/consultations/the-revised-delivery-plan-for-continuation-of-data-services-dsp/>

1.2. Consultation Questions and Respondents

7. The consultation presented the questions as set out in the below table.

1	Is there anything further that you would like us to consider within our planning activities? Please provide any details.
2	Do you agree with the proposed revised LC13B plan? Are there any milestones that you consider should be included that are not? Please provide a rationale for your views.
3	Do you agree with our DSP Programme approach up to Contract Award?
4	Do you agree with DCC's approach to testing? Are there any other testing constraints or opportunities that should be considered?
5	Do you agree with DCC's approach to Regulatory Change? Are there any other matters that should be considered?
6	Do you agree with our planned DSP Programme approach following Contract Award?
7	Do you agree with our assessment of external change which could impact or be impacted by the re-procurement of the DSP Service? Are there areas that we have not considered?
8	Do you agree with DCC's updated dependencies and assumptions? Are there any that have not been included, or any which have been included incorrectly or inaccurately?
9	Do you agree with DCC's updated assessment of the key external risks and opportunities? Are there any that have not been included, or any which have been included incorrectly or inaccurately?
10	Do you support DCC's proposals for engagement with stakeholders during the delivery of the plan? Please tell us why.
11	Do you support DCC's proposals for LC13B Milestones that should be included within the JIP? Please explain your response.

1.3. Responses

8. DCC received 5 responses from stakeholders, comprising:
 - a. 2 Large Energy Suppliers;
 - b. 1 Distribution Network Operator;
 - c. 1 Governance Body; and,
 - d. 1 Telecommunications Provider.
9. DCC would normally have expected a larger number of stakeholder responses for a Programme of this size; however, we are interpreting this as an indication that Stakeholders are comfortable with the proposed plan, at least up to contract award and appointment of Service Providers. At this point DCC will be in a position to share more information on the next stage of the Programme, particularly in relation to transition and migration activities for DSP.
10. Section 2 of this document sets out the feedback received from stakeholders in response to our consultation. Section 3 of this document sets out the changes that we have made to the DSP Plan. The final version of the proposed plan POAP can be found in Appendix A and final version of our proposed Milestone Plan is within Appendix B, subject to the next steps noted within Section 4.
11. Plan milestones are referenced as MS##, throughout this document, in reference to the Appendix B milestone table.

2. Questions – feedback and DCC conclusions

12. DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.
13. We have summarised the key points made in relation to each question in the subsections of this chapter. Where respondents have reiterated points across numerous questions, we have set out our response for the most relevant question. Copies of all responses in full have been shared with the Secretary of State to inform their decision as to whether or not to approve DCC's plan.

2.1. Planning /question 1 & 2

14. DCC sought views on the activities planned over the course of the programme and the proposed supporting milestones, asking the below questions:

2.1.1. Question 1

Question 1

Is there anything further that you would like us to consider within our planning activities? Please provide any details.

Response summary

15. Respondents to this question were broadly supportive of DCC's proposals and raised the below points:
 - a. One respondent noted that the plans at present are high level and requested that DCC remain transparent in progress against these milestones and to keep the Panel and the industry informed of any delays that may arise. This would allow for discussion to take place on how to mitigate any issues. The same respondent noted that the plan milestones are at a high level and further detail would be needed to have full confidence in delivery. One respondent noted that they would expect to see DBT milestones following contract award.
 - b. One respondent raised concern that DCC has not committed to the use of Prince2, rather than the DCC's Change Delivery Methodology (CDM). It was the respondents view that best practice would be achieved through use of Prince2 methodology and would like to understand the rationale for continuing to use CDM for the implementation of the DSP Programme.
 - c. One respondent suggested that is It would be prudent to ensure that any contract agreed will cover the period up to MS47: DSP DS Transition and Migration Complete, but also has an optional incumbent DSP extension period should the DSP project be delayed for any reason.
 - d. One respondent raised concerns with the specifics of the planned activities relating to SI, these concerns included the role of the SI partner and their involvement in the design, build and test activities of the programme, and that the approach to contract award was confusing in regard whether the SI role will be independent to the DSP or if contracts can be awarded to the same party.

- e. One respondent specifically asked about whether the Communications Hub IP address will continue with no disturbance to the existing fleet or allocation process, given the devices have the DSP IP address hard coded in them and the proposed approach to a phased migration.

DCC conclusions

16. DCC welcomes the broad support for our planned activities, acknowledging the importance of stakeholder engagement on relevant topics and that further information should be shared once DCC is in a position to better describe the Programme path from contract award to Programme complete. We respond to the specific points raised by respondents below:

- a. DCC fully acknowledge the point made in relation to engagement and plan detail. It is DCC's intent to share more detailed plans with SEC Panel, sub committees and other stakeholders as appropriate. Above regular planned engagement, DCC will engage the appropriate SEC forum should a material Programme risk or issue emerge/change, to allow DCC to remain as transparent as possible.
- b. As we described within our consultation, the DSP Programme plan is working towards a timely and robust contract award process in October 2024, with a well-defined plan up to this milestone. At this stage we cannot fully describe the path from contract award to programme close down but commit to engaging with stakeholders on this to provide greater certainty for the next stage of the plan once Service Providers have been appointed, including additional granularity in DBT activities. DCC has included two control points in the remainder of our plan, including one following contract award to consider whether future consultation is needed at that point. In alignment with this approach and our Programme Assurance Policy (PAP) commitments, DCC plans to share the draft PID with SEC Panel in July 2024.

DCC remains committed to implementing Prince2 in place of the existing CDM framework across the organisation. This must be done in a controlled way and with certainty that any additional DCC costs associated with this implementation are appropriate and can be justified. Once the new methodology is embedded a decision must be made for ongoing Programmes such as DSP.

As stated DCC remains committed to the implementation of Prince2 across all aspects of the programme life-cycle including (where appropriate) use of the Green-Book business case methodology. It's DCC's view that the Green Book methodology stages of the programme is where the use of Prince 2 could drive the greatest value. Since DSP is already past certain stages of the green book business case, the benefit of moving from CDM to Prince2 is reduced for this programme. However, it remains DCC's intention to move to Prince 2, subject to a robust transition plan with full cost justification and an impact assessment on any in-flight programmes including DSP.

Whilst the preference is to implement Prince2 across the organisation, it is worth noting that the existing DCC CDM framework was based on Prince2 when it was developed and in DCC's view remains fit for purpose. Further to this, as part of the DSP procurement exercise, organisations that bid to become a DSP Service Provider must be Prince2 accredited as a firm prerequisite.

In summary, while the DCC is dedicated to implementing Prince2 across the organisation, including the DSP programme, we approach this transition with a focus on controlled implementation, cost justification, and a thorough consideration of the impact on ongoing programmes. We appreciate stakeholder ongoing support and

engagement as we work towards achieving the highest standards of programme management.

- c. DCC fully supports the point made and is presently working with the incumbent DSP provider to ensure that there is sufficient time to run a procurement and undertake DBT / migration of the new solution. This will include various options to extend services further in the event of delay to the Programme. This extension is subject to a business case and appropriate stakeholder engagement. DCC has previously included and retains a specific milestone within its plans to reflect that this agreement of extension will be in place with the incumbent in April 2024.
- d. The DCC's strong preference is for the successful bidder to be independent, which would allow the DSP Systems Integrator to perform the same role as the incumbent but allow it to perform the assurance role with the DSP Core lot winners, assuring the quality of the design and code as part of this role. However, should this independence not be possible through a competitive process, DCC will exercise its right to award the same provider to the DSP and role of DSP SI. Progress of the DSP SI procurement will be shared with Customers and DESNZ throughout the process and in line with our engagement commitments.

DCC will propose an approach and timeline detailing how the component integrators of the legacy DSP, new DSP and other DSP providers will work together through the migration. Engagement with DCC customers and DESNZ will commence in spring 2024, as part of DCC's commitment to engage on Transition and Migration milestones detailed in our response to question 4.

- e. DCC acknowledges the point raised in regard to Communication Hub IP addresses and commits to working with the successful Service Provider in addressing this as part of our transition and migration approach. At this stage it is DCC's view that the Communication Hub IP address does not necessarily need to change; however, this will be determined by the outcome of collaborative solutioning as part of the procurement process.

2.1.2. Question 2

Question 2

Do you agree with the proposed revised LC13B plan? Are there any milestones that you consider should be included that are not? Please provide a rationale for your views.

Response summary

17. Responses to this question were broadly neutral, with the below points raised:

- a. One respondent noted that timescales for the Programme are 'tight' and would need close DCC control. Linked to this point, one respondent noted their expectation that more detailed DBT milestones would be seen after contract award.
- b. One respondent noted the potential for an additional milestone to allow for Private Key Transfer activity, should the new DSP provider be different from the incumbent. The respondent also noted that there are known issues with asset certificate rotation

and should this transfer be needed DCC should avoid stranding customer assets with the incumbent DSP.

- c. One respondent raised a concern that delivery of the DSP Programme is delayed, and a revised plan is necessary. The respondent noted the criticality of the DSP in relation to wider DCC infrastructure and is further concerned that we risk making rushed key decisions leading to costly contract extensions or impacts to DSP operations.

DCC conclusions

18. DCC addresses the points raised below:

- a. DCC agrees that delivery of the DSP Programme should be managed robustly and as such, we have implemented a core delivery function to ensure that delivery is tracked and issues or risks to Programme deliverables are managed or escalated as appropriate. Additionally, DCC is planning to provide updates on Programme progress through the established JIP governance arrangements and SEC committees, including adherence to the PAP. Contract Award will be a key milestone to support more detailed future plans, particularly in relation to the DBT, transition and migration phases and is closely followed by our Control Point 2 milestone that will allow DCC to consider whether further plan consultation is required.
- b. DCC agrees that a milestone would be required to allow for Private Key Transfer activity, should the new DSP provider be different from the incumbent. DCC commits to addressing this as part of our overall transitional planning, for which we have included an additional milestone for (MS07) as part of this consultation conclusion.
- c. We acknowledge that the Programme is being delivered later than the original plan approved following our September 2021 LC13B consultation. However, during this time DCC has undertaken significant engagement with key industry stakeholders and the organisations that could potentially bid to contract for a DSP role through competitive procurement. This has allowed us to plan robustly up to contract award through a tried and tested 12-month procurement window approach. We highlight within our consultation that we cannot fully describe the path from contract award to programme close down as this is dependent on the Service Provider appointed and planning will need to include further engagement with stakeholders.

To reflect this, we have included a number of control points within our plan where we will engage with stakeholders on greater certainty and granularity for the next stage of the plan. This is in addition to regular, routine engagement with SEC Panel and DESNZ. The DSP decision making process itself is defined within the plan we have consulted on. This provides time for both stakeholder engagement and considered review / decision making, avoiding rushed decisions.

Negotiations with the incumbent DSP Service Provider are ongoing and will provide sufficient time to run a procurement and undertake DBT / migration of the new solution. This will include various options to extend services further in the event of delay to the Programme. Value for money of the contract extension is subject to ongoing negotiations with the incumbent Service Provider.

2.2. Delivery Plan Activities to Contract Award /question 3

19. DCC sought views on the DSP Programme approach up to Contract Award, asking the below question:

2.2.1. Question 3

Question 3

Do you agree with our DSP Programme approach up to Contract Award?

Response summary

20. DCC received broad support for our approach with the below points additionally being raised by stakeholders:
- a. One respondent commented that each Statement of Work highlighted within the consultation is for an 8-year period and was concerned over the lack of optional contract extensions should the new DSP service be efficient and cost effective.
 - b. One respondent sought confirmation that the wider requirements for the new DSP provider includes those lessons learnt from live operation of the current DSP over the last ten years to allow for operational experience to be reviewed and any lessons learnt included in the requirements.
 - c. Two respondents noted the lack of reference within the DSP consultation to security assurance, noting that DCC has obligations relating to security within the Smart Meter Communications Licence and the SEC, including the requirement for independent security assessments during the design, build and testing of any new or changed components.
 - d. One respondent sought assurance from DCC that the exit provisions of the new DSP Service Provider will be suitably robust, noting ownership of Intellectual Property Rights (IPR) as an example.

DCC conclusions

21. DCC addresses the points raised below:
- a. We understand the concern raised and have provided additional information, not part of the consultation document, to address this point. The contract award, presently scheduled for 31st October 2024 will include an initial period of DBT and migration for 3 years followed by 8 years of operational service. In addition to this DCC will have the contractual option to incrementally extend the service for up to a further 3 years.
 - b. DCC has applied its experience and lessons learned from live operation of the current DSP and incorporated these within the programme requirements. As part of the ongoing DSP requirements definition work, DCC experts with operational experience are closely involved in workshops and review cycles, to ensure that real world lessons learnt from the operational DSP are being addressed. To reflect customer experience high level requirements were provided to SEC subcommittees (TABASC, OPSG and SSC) for their feedback, and DCC will continue to do so in subsequent requirement iterations.

- c. DCC agrees with the points raised in relation to Security Assurance and our plans already include meeting the noted regulatory requirements. We include additional information below. To avoid any doubt, DCC will undertake the steps needed to meet our regulatory obligations, including the required independent security assessment. Additionally, we have an ongoing commitment to continue to engagement with SSC on Security related matters. The appointed independent assurance provider will need to engage directly with SSC to review and agree the scope of assurance and take recommendations.

Procurement of the Competent Independent Organisation (CIO) will start imminently with a view to CIO contract award well ahead of the Programme design phase. We have included three additional milestones within our Programme Plan:

MS16 - CIO Appointed - DCC will have appointed an organisation to provide CIO services as per SEC security assessment requirements including to work with the CIO, SMKI PMA and SSC to confirm the assessment scope. Appointment will be by 30 Aug 2024.

MS35 - Interim CIO report - An interim CIO report will be shared with the SSC. Completed by 20 Aug 2025.

MS41 - CIO report and remediation plan submitted. The first complete CIO report and remediation plan is submitted to the SMKI PMA and SSC. Completed by 14 Jul 2026.

The CIO will remain appointed until after the new system goes live to allow for the necessary recommendations and additionally to support any remediation/assurance activities that may be needed at that time.

- d. In relation to future Service Provider exit provisions, DCC can confirm there will be core contractual principles in place ensuring that DSP will have the right for continuous uninterrupted service in the event of either a full or partial termination of the (then) incumbent Service Provider and transition to a different 3rd party Service Provider. This includes the necessary IPR rights to facilitate the principle of DCC retaining ownership of IPR where it is possible to do so.

2.3. Delivery Plan Activities post Contract Award /question 4, 5 and 6

- 22. DCC sought views on the DSP Programme plan post Contract Award, asking the below questions:

2.3.1. Question 4

Question 4

Do you agree with DCC's approach to testing? Are there any other testing constraints or opportunities that should be considered?

Response summary

- 23. Respondents were overall supportive of DCC's approach to testing at this stage of the Programme. A number of points were raised:
 - a. One respondent suggested that the User Testing period has a very tight timescale and is scheduled over the summer holiday period.

- b. One respondent supported that real devices will be used in testing but would be concerned if this changed in the future, leading to a fallback onto emulator testing.
- c. A number of respondents stated their expectation that the SEC's Testing Advisory Group (TAG) would be engaged to review the Programme testing approach. One respondent expanded that this should include the outcomes of each testing phase and TAG should provide its views against the corresponding Live Services Criteria and greater visibility of any defects found during User Integration Testing (UIT).
- d. One responded raised there is little reference to achieving operational readiness within the proposed Programme plan and would like this to be more clearly recognised, noting the six-week period between completion of User testing and go-live may be a demanding schedule. The responded further noted that planning should better reflect changes other than the system changes needed for the new DSP capability, such as processes, personnel, or infrastructure.
- e. One responded suggested that Component Integration Testing (CIT) needs to be explored with DCC to ensure scope, approach and impact is universally understood and that Device Adoption for PIT needs to be a key consideration, alongside the TAF Operating Model.

DCC conclusions

24. We have responded below to the points raised:

- a. DCC's current assumption, on which the plan is based, is that User Testing will be almost completely focused on regression testing – at the time of writing there is no intention to provide new functionality from the new DSP. It is felt that 2 months provides sufficient opportunity for such testing to be completed. It should be noted that the DSP code will continue to reside in the User Testing environment and as such will be available for Service User testing up to and beyond the go live date.

User testing timescales and requirements can be reviewed and validated once Service Providers are appointed and once the transition and migration approach has been developed.

- b. DCC does not intend to 'fallback' onto emulator testing; the vast majority of testing will be conducted using real devices. The exceptions will be either where devices are unavailable, or where tests are destructive and result in the future unavailability of that device.
- c. DCC is pleased to acknowledge that TAG will continue to play a key role in providing a governance oversight through review and approval of the key testing artefacts. These will include Test Approach Documents, Test Coverage Documents, and Test Completion Reports.

DCC acknowledges the request for greater visibility of UIT testing issues, and we will ask TAG to discuss this request. Subject to Service User confidentiality, DCC sees no issue with providing all relevant available detail of any testing issue identified in UIT or any testing phase.

DCC will continue to provide a monthly update to TAG on the general progress towards procurement of the new DSP, and during this period will set up a quarterly session at TAG to discuss any specific test-related topics for this programme. It is

anticipated that the first of these quarterly sessions will take place in the March 2024 TAG.

- d. In reference to operational readiness, DCC agrees with the importance of completing robust operational readiness in advance of go-live. DCC has a milestone in place to submit evidence that it has met the Live Service Criteria (LSC) to DESNZ and SEC Panel, which would include acceptance criteria (defined by DESNZ) including on operational readiness.

DCC is planning to undertake Transition to Operations Testing (TTOT), which includes Operational Acceptance Testing and additionally Business Acceptance Testing to satisfy internal operational readiness requirements and the outcome will help inform the LSC acceptance criteria. This will include relevant processes, personnel and infrastructure changes. OPSG will be engaged and provided with information to allow recommendations to be made to the SEC Panel in relation to our LSC submission milestone (MS44).

Additionally, DCC has added a new Transition engagement milestone to our Program plan, which will allow for additional engagement and compliment any updates that DESNZ direct to the Transition and Migration Approach Document (NETMAD). This early engagement session will seek to capture DCC Stakeholder views and considerations in relation to future transitional arrangements. This session will not be to present a detailed plan but an opportunity for stakeholders to raise any specific areas that may be impacted, concerns, risks or other considerations that DCC will need to take into account in advance of agreeing final DSP Service Provider contracts. This session will also capture stakeholder views on how future engagement could work for this topic, with the scope of related regulatory change being consulted upon in advance of November 2024 as per (MS28) and being confirmed in August 2025 (MS33). The new milestones is:

MS07 - SP Data Systems - Transitional Engagement Commenced – Stakeholder Engagement commenced in relation to DSP Transitional Arrangements by 01 Apr 2024.

- e. DCC intend to incorporate a CIT test stage to de-risk SIT testing. This will be conducted by the DSP SI. The focus of CIT is the integration points; ensuring that the system components will pass data between them as required by the specification.

TAF will be used to validate DSP functionality in SIT and in UIT; any decision on whether TAF would be used in PIT will be deferred until discussions with the successful bidder have concluded.

In regard to adoption, DCC will be proposing that device selection for PIT (including CIT) and SIT will be determined by running the Device Selection Methodology rules against the current and future anticipated estate.

2.3.2. Question 5

Question 5

Do you agree with DCC's approach to Regulatory Change? Are there any other matters that should be considered?

Response summary

25. The majority of respondents were supportive of the programme approach to regulatory change with the below points additionally being raised:

- a. A number of respondents sought additional clarity in relation to a potential change freeze and how this would be implemented. Additionally, one respondent requested the DCC discusses and agrees any such approach and timings with the SEC Panel before proceeding and remains in close contact with the SECAS over the scope and timing of future SEC Releases.
- b. One respondent requested that DCC discuss and agree DSP impacting SEC modifications with the Panel before proceeding and remain in close contact with SECAS during the progression of these potential modifications to the SEC.
- c. One respondent noted the possibility of different regulatory change topics being consulted upon at different times understanding the drivers for this. A concern was raised that stakeholder time is limited, and they may not have the resources to respond to multiple consultation topics, noting a preference for as few packages as possible to mitigate the time needed by stakeholders to respond.
- d. One respondent asked to better understand the potential regulatory changes as a result of the DSP Programme, in light of the aim that the new arrangements continue to meet SEC requirements.

DCC conclusions

26. DCC welcomes the support for its approach to regulatory change. We respond to the specific points raised below:

- a. The possibility of a change freeze has been suggested at TABASC and with DESNZ. DCC must meet its License and SEC requirements in relation to regulatory change to the fullest extent possible during this period. Impacts on ongoing change will be considered in advance of the DSP procurement contracts award. Timely stakeholder engagement is key to the success of this programme, including SEC Panel and SECAS, and any change 'freeze' will only go ahead if approved. The most likely date for this engagement will be in the spring of 2024 as part of DCC's commitment to engage on Transition and Migration milestones detailed in our response to question 4. Further information will be included within the November 2024 Proposed Scope of Regulatory Change milestone. Additionally, DCC will initiate regular engagement with SECAS to align on transitional arrangements that relate to SEC modifications and release management. This will commence in Q2 2024.
- b. We can confirm that DCC will fully engage with SEC Panel, relevant SEC sub-committees and SECAS as appropriate on DSP Programme matters relating to SEC modifications. Additionally, DCC has committed to more widely consult with stakeholders on our approach to industry change that supports the DSP Programme. This is captured within Proposed Scope of Regulatory Change milestone.
- c. We agree with the point raised that additional time and resource is required to respond to multiple regulatory change consultations. It is DCC's intent to consolidate these consultations as much as possible and only consult separately by topic if absolutely necessary.
- d. We agree with the point raised, any SEC changes as a result of the DSP Programme will be to facilitate / support implementation of the new service provider rather than

seeking to change SEC requirements for any other reason. We are not aware of any firm changes to the SEC that are required at this point in time, other than the NETMAD and SVTAD noted within our consultation. DCC will begin work to identify potential regulatory change once a preferred Service Provider has been selected and consult in alignment with our regulatory change milestones.

2.3.3. Question 6

Question 6

Do you agree with our planned DSP Programme approach following Contract Award?

Response summary

27. The majority of respondents were supportive of the programme approach following contract award, with the below points additionally being raised:
- a. One respondent noted and was supportive of the DSP Programme control points; however raised a concern that justification would need to be provided for any slippage to the consulted on plan.
 - b. One respondent noted and was supportive of the two milestones seeking the Panel's input on the Full Business Case (FBC) and the Live Services Criteria (LSC) before these are decided upon. The respondent additionally asked for more information on how these go/no-go decisions will be made.
 - c. A number of respondents mentioned the need for more information and a structured approach to transition and migration, including engagement with DCC Users to ensure that these phases are suited to industry needs.
 - d. One responded noted the expectation that the DSP SI partner should be heavily involved in this stage of the programme and further noted the absence of reference to the actions of this partner within the proposed activities.

DCC conclusions

28. DCC welcomes the support for its approach following contract award. We respond to the specific points raised below:
- a. We agree with the point raised, changes to the programme plan would need to be explained and justified to stakeholders. The proposed plan Control Points are included to support refinement where new information becomes available, DCC is confident in delivery of this plan based on the information we have available at this point within the programme lifecycle. Any replan or refinement activity will be based upon new and subject to stakeholder consultation.
 - b. In response to the point raised concerning SEC Panel input to the DSP Data Systems FBC and LSC, DCC will, in advance of a decision being made on these key programme topics, commit to engage with SEC Panel and relevant SEC Sub-Committees. For LSC, DCC expects to follow the governance and engagement process as we have done previously for other LSC submissions but welcome any suggestions on how this may be improved. For FBC, DCC will work with the SEC Panel alongside other

stakeholders to capture views in relation to the DSP solution options and the transition approach and specifically seek Panel endorsement of spend on desirable items ahead of submitting any FBC for DESNZ non objection.

- c. We welcome the support from respondents acknowledging that the transition and migration phases of the plan can only be planned for following appointment of Service Providers. We agree that DCC will need to provide further information in relation to transition and migration and therefore have included an additional Transition Plan milestone, which will support early engagement with stakeholders. This is described in more detail in our conclusion to question 4.
- d. Systems Integration is key to the success of this program, assuring quality and cohesion of the various elements of the solution and supporting customers in their testing. The DCC values the interaction of Customers and DESNZ and will engage with stakeholders regarding the interaction between the legacy and new Systems Integrator(s) and as the procurement progresses. These are described in more detail in our conclusion to question 2.

2.4. Plan interactions with other DCC and Industry Change /question 7

29. DCC sought views on the DSP Programme approach to managing external change, asking the below question:

2.4.1. Question 7

Question 7

Do you agree with our assessment of external change which could impact or be impacted by the re-procurement of the DSP Service? Are there areas that we have not considered?

Response summary

30. The majority of respondents were supportive of the programme approach to external change with the below points additionally being raised:
- a. One respondent suggested that the DCC, in addition to the external change identified, also identifies topics where it may be too early to include in this list or where there is currently no impact. An example was raised by the respondent, which is the potential for future Government decisions on the usage of Hydrogen to heat homes and the related impact that this may have on DCC and related new smart devices that may be required.
 - b. One respondent suggested that DCC's plan should recognise any business-as-usual areas or activities that may impact or be impacted by the re-procurement of the DSP service.

DCC conclusions

31. DCC welcomes the support for its assessment of external change that could impact or be impacted by the re-procurement of the DSP Service. We respond to the specific points raised below:
- a. Future regulatory change that may result in the need for additional smart devices, such as the potential to introduce Hydrogen as a fuel source for consumption within

GB homes, is out of scope of the DSP business case and DSP Programme. However, the new DSP service, once implemented, will be more adaptable to change, delivering change more quickly, more flexibly and more cost effectively than possible with the present DSP system.

DCC is aware of and actively monitors / engages with stakeholders on the future regulatory landscape, particularly where topics may have an impact on the services that DCC provides. Where relevant DCC participates in trials that demonstrate the broader potential of the Smart Metering System, where this aligns with overall Government/Ofgem policy and where relevant and allowable under our licence.

Any additional regulatory change that is not planned for within the DSP Programme would need to be impact assessed on a case-by-case basis to understand the costs and impacts of implementing such a change into the old and new DSP system, at that point in time. We agree with the overall point made and are treating this as a risk. We have updated Risk 3 (R3) to better reflect this point.

Ref	Description	Impact	Mgt Strategy
R3	Updated: Urgent SEC MOD releases or unplanned additional change are required to be implemented at short notice or during the implementation of the new DSP system (particularly for direct DSP impacts).	Planned project timeline could be delayed and costs increase as a result of in-flight changes.	Changes between contract award and go-live of the new solution will have to be impact assessed by this programme and a decision taken by the appropriate body as to whether the change is urgent enough to require incorporation into the programme in-flight.

- b. DCC is planning to undertake robust Operational Readiness tests to ensure any BAU or other non-DSP areas/activities are not impacted by implementing the new DSP service without mitigations being in place. We describe this in relation to the LSC in our conclusion to question 4.

2.5. Dependencies and Assumptions / question 8

32. DCC sought views on the DSP Programme approach to Dependencies and Assumptions, asking the below questions:

2.5.1. Question 8

Question 6	Do you agree with DCC's updated dependencies and assumptions? Are there any that have not been included, or any which have been included incorrectly or inaccurately?
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Response summary

33. Two respondents to this question supported the DCC Dependencies and Assumptions consulted upon, the remaining three responses were broadly neutral.
 - a. One respondent noted that Assumption A4 was incorrectly worded and suggested some alternative wording for this assumption.

- b. One respondent suggested that DCC should consider an impact assessment of our Service Providers that may be impacted by changes as a result of our FSM (DSMS) plans.

DCC conclusions

34. DCC welcomes support for our Programme Assumptions and Dependencies.

- a. We agree with the respondent that suggested Assumption A4 was incorrectly worded and provide an updated assumption below.

Ref	Title	Description
A4	New: Provision of Legacy DSP Services	Legacy DSP services will be available for the period up to DSP DS Transition Complete to the new DSP Service Provider(s) as described in Section 3.2.

- b. We agree with the point raised regarding impact assessment of our Service Providers as a result of the FSM Programme. This step was already in plan but considered too low detail for the DSP consultation. DCC are tracking this impact assessment as an internal plan dependency and do not anticipate the outcome to impact plan timelines. Relevant Change Requests (CRs) will be issued to key Service Providers at the appropriate time.

2.6. Risks and Opportunities /question 9

35. DCC sought views on the DSP Programme approach to Risks and Opportunities, asking the below question:

2.6.1. Question 9

Question 9	Do you agree with DCC's updated assessment of the key external risks and opportunities? Are there any that have not been included, or any which have been included incorrectly or inaccurately?
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Response summary

36. Respondents were overall supportive in response to this consultation question. No additional risks were suggested for inclusion; however, the below points were made.

- a. One respondent noted the potential for Urgent SEC Modifications and associated risks and sought confirmation that DCC will engage fully with the SEC Panel in DSP matters that relate to SEC modifications.
- b. One respondent described the risks highlighted by DCC as lacking information and failed to provide confidence that they are adequately being managed, additionally asking for further information that would provide confidence that the actions stated are sufficient to manage the associated risk.

DCC conclusions

37. DCC welcomes support for the DSP Plan risks and opportunities. We address the points made below:

- a. In relation to Urgent SEC Modifications or any other DSP related SEC modification matter, we can confirm that DCC will fully engage with SEC Panel and relevant SEC sub-committees as appropriate. Additionally, DCC has committed to more widely consult with stakeholders on matters relating to industry change that supports the DSP Programme within our Milestone Plan.
- b. In relation to risk management, the DSP Programme makes use of an industry leading risk management system, supported by a Programme management process. The risks consulted upon within the consultation are the material risks identified at this point, that external stakeholders should be aware of, rather than intending to describe each risk at a detailed level. We believe the management strategy we have provided is sufficient information for this purpose. Should there be any material change to the risks highlighted or new material risks identified DCC commits to engaging with IMF, DESNZ and SEC Panel as appropriate and in a timely manner.

2.7. Customer Journey and Engagement /question 10 & 11

38. DCC sought views on the DSP Programme approach to Engagement and future JIP Milestones, asking the below questions:

2.7.1. Question 10

Question 10

Do you support DCC's proposals for engagement with stakeholders during the delivery of the plan? Please tell us why.

Response summary

39. Respondents were overall supportive in response to DCC's proposals for engagement with stakeholders. Additionally, the below points were made:

- a. One respondent noted support for DCC's alignment with the Programme Assurance Policy (PAP). Additionally, the respondent requested greater visibility of the artefacts that would be required under the PAP and greater visibility and opportunity to input on the programme business cases in advance of submission to DESNZ.
- b. Multiple respondents requested that DCC agree to develop and maintain an engagement plan with Users that aligns with the overall programme plan. This engagement plan should include more detail and key engagement points and their purpose. Additionally, the respondent requested that this plan is published and made subject to change control.
- c. One respondent suggested that DCC should improve feedback as to what has changed as a result of any stakeholder engagement as this is often not made visible to stakeholders.

DCC conclusions

40. DCC welcomes support for the DSP engagement proposals. We address the points made below:

- a. DCC remains committed to the PAP and at this stage of the DSP programme are expecting to share the draft Project Initiation Document (PID) with all sub-committees and the SEC Panel. This is planned for July 2024. In relation to Programme business cases, DCC I intends to provide full access for SEC Panel and specific access to relevant sub-committees as appropriate. The DSP Programme has developed and is now sharing a 6-month forward look engagement plan with each SEC Sub-Committee, SEC Panel and IMF, which contains key engagement points. Following baselining of the DSP Milestone plan, these milestones will also be included within the engagement plan for additional visibility. DCC is planning to publish this forward look engagement plan on its website during Q1 2024. The plan itself is fluid and subject to change, both from DCC and requests from stakeholders. Therefore, it is not easily subject to a change control process; however, DCC will endeavour to include a date on the website that reflects the latest update.
- b. DCC takes into account feedback from stakeholder engagement and will continue to do so in the future. An example of this would be how the DSP OBC Options 1 & 2 were reflected in the final OBC submission. Going forward and where possible DCC will endeavour to make clear to stakeholders on recurring topics, where a change has been made as a result of stakeholder input.

2.7.2. Question 11

Question 11

Do you support DCC's proposals for LC13B Milestones that should be included within the JIP? Please explain your response.

Response summary

41. The majority of respondents provided support for DCC's proposed JIP milestones, subject to any changes as a result of feedback to this consultation. Additionally, one respondent noted that these milestones may need to change as the programme matures.

DCC conclusions

42. DCC welcomes the support for our proposed DSP JIP milestones. We agree with the respondents that the plan should reflect changes as a result of feedback to this consultation, which we detail in each relevant section. We have included a summary of proposed changes to the plan milestones within Section 3 and have updated POAP's within Appendix A and an updated proposed Milestone Table within Appendix B.
43. We note and agree with the point raised that this plan may need to change as the Programme matures. To address this point, DCC has included appropriate control points within the Programme lifecycle to allow for a review of the milestones. Typically milestone reviews will follow a major event such as appointment of a Service Provider or baselining of detailed design and allow DCC to plan with increased certainty from that point.

3. Changes to the Plan

44. Following stakeholder feedback, we have made changes to the plan consulted on in November 2023. We summarise these changes below and detail within a revised Plan on a Page (POAP) in Appendix A and a revised Milestone Plan in Appendix B of this document.

New Transition Milestone

45. In response to stakeholder feedback, as described within the conclusions to Question 4, DCC has included an additional plan milestone in relation to Transition, this new milestone is:
- a. MS07 - DSP Data Systems - Transitional Engagement Commenced – Stakeholder Engagement commenced in relation to DSP Transitional Arrangements by 01 Apr 2024.

This milestone has been incorporated within Appendix B.

New Security Assessment Milestones

46. In response to stakeholder feedback, as described within the conclusions to Question 3, DCC has included additional milestones that relates to appointment of a CIO to undertake security assessment services. These new milestones are:
- a. MS16 - DSP Data Systems – CIO Appointed - DCC will have appointed an organisation to provide CIO services as per SEC security assessment requirements. Following appointment, DCC will work with the CIO, SMKI PMA and SSC to confirm the assessment scope. Appointment will be by 30 Aug 2024.
 - b. MS35 - DSP Data Systems – Interim CIO report - Following completion of the Design phase, an interim CIO report will be shared with the SSC. Completed by 20 Aug 2025.
 - c. MS41 - DSP Data Systems – CIO report and remediation plan submitted. The first complete CIO report and remediation plan is submitted to the SMKI PMA and SSC. Completed by 14 Jul 2026.

These milestones have been incorporated within Appendix B.

System Integration

47. It is DCC's intention that the contracts for the DSP Systems Integrator will be awarded on a similar timeframe as the DSP Core lots, rather than the shorter period of 3 years as previously set out. This new timeframe is 2 years of DBT followed by 8 years of run. This longer contract period provides for a stronger position in supporting continuity of service, for example should a longer period to embed the new DSP, be required or as contingency. This longer contract will include suitable break points, enabling flexibility to pursue other SI arrangements if needed.
48. The SI contract will commence immediately after award and will start with integrating the DBT of the Core Lots while the incumbent will continue to be the lead SI, coordinating other SI's and related activities for DSP, such as triage. At the appropriate time and in advance of migration the new DSP SI will transition to become the lead SI for DSP activities.
49. As this SI contract/arrangement (subject to break points) will continue post DBT we are now referring to this as DSP SI, rather than 'DSP SI DBT'.

50. Once the DSP Core lot goes live the new DSP Systems Integrator will become the lead while the incumbent will continue until the last meter is migrated. The contract will co-terminate with the DSP Core lots.
51. Each of the contracts is based on the principle that there would be regular breakpoints to provide the DCC the advantage of reprocurring each of the Statements of Work through the duration of the contracts if required at no additional cost and the contract award for each of these Statements of Work being set up in a similar manner.
52. As such, we have removed the following milestone as no longer required:
 - a. DSP SI Sub-Programme – Extend Enduring SI Decision - Latest Point at which DCC will make a decision on whether to exercise contractual options to extend scope of SI to include Enduring SI activities.
53. The following SI related milestone has been added to provide increased transparency of this key programme activity:
 - a. MS01 – DSP SI Sub-Programme – DESNZ decision on non-Objection to Strategic Business Case Non-objection to SOC confirmed by DESNZ by 21 Feb 2024.
54. The following SI related milestones have been updated as the lower level detail has been further developed in the Programme lifecycle. The final delivery milestone has moved by less than two weeks, which is not material to the overall plan timescales. Whilst some of the interim milestones have moved by a longer period and therefore is more condensed, is still achievable due to utilisation of contingency previously built into this period. These updates are:
 - a. DSP SI Sub-Programme –Outline Business Case Submission has been updated from 15 Dec 2023 to 26 Feb 2024.
 - b. DSP SI Sub-Programme –DESNZ decision on non-Objection to Outline Business Case has been updated from 09 Feb 2024 to 26 Mar 2024.
 - c. DSP SI Sub-Programme –RFP Issued has been updated from 04 Mar 2024 to 29 Mar2024.
 - d. DSP SI Sub-Programme –Full Business Case Submission has been updated from 21 Jun 2024 to 26 Jul 2024.
 - e. DSP SI Sub-Programme –DESNZ decision on non-Objection to Full Business Case has been updated from 26 Jul 2024 to 23 Aug 2023.
 - f. DSP SI Sub-Programme - Award Contract has been updated from 31 Jul 2024 to 06 Sep 2024.
 - g. DSP SI Sub-Programme –Systems Integrator in place has been updated from 30 Aug 2024 to 09 Sep 2024.

Other Changes

55. DCC has made minor updates to the following milestones during the course of the consultation as the lower level detail has been further developed in the Programme lifecycle. These milestones have moved to the left; therefore, not materially impacting the overall plan timescales. These updates are:

- a. Data Systems - Full Business Case (FBC) Submission has been updated from 13 Sep 2024 to 02 Sep 2024.
- b. Data Systems –DESNZ decision on non-Objection to Full Business Case has been updated from 18 October 2024 to 30 Sep 2024.

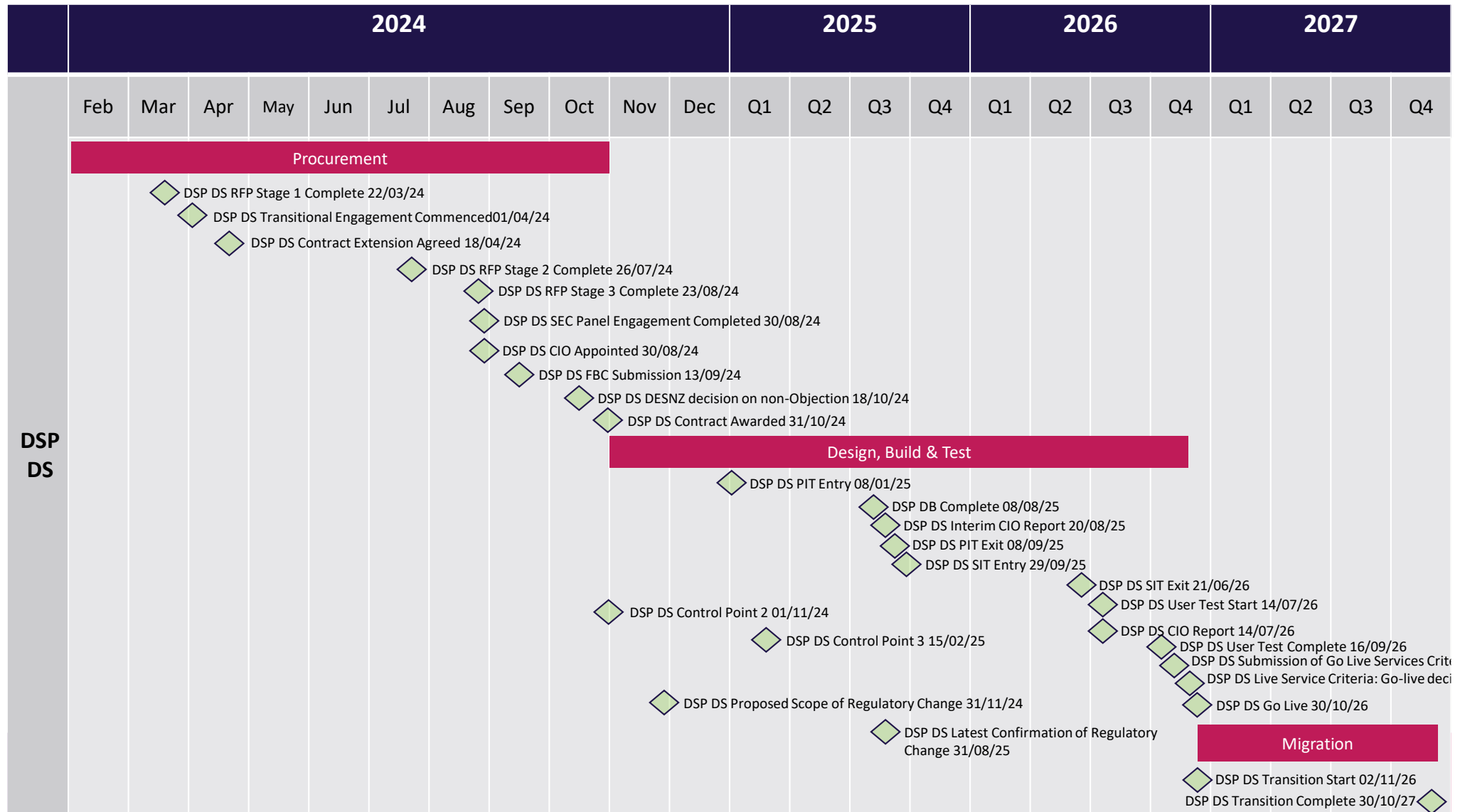
Milestones that have completed

56. The following milestones have completed during the course of the plan consultation and therefore have been removed from our Milestone Plan (Appendix B):
- a. Data Systems –RFP Issued - RFP issued for the Data Systems Programme. ITT issue, subject to receipt of non-objection from the Department. (06 Nov 2023)
 - b. DSP SI Sub-Programme – Strategic Outline Case Submission All DCC Internal approvals complete. Strategic Outline Case issued to the Department for review. (17 Nov 2023). (DCC resubmitted a revised DCC SOC on the 24th January 2024, following extensive discussions during the interim period, between DESNZ and DCC).
 - c. Data Systems –RFP, First Down Select First down selection has completed. (07 Dec 2023)
 - d. FSM – Strategic Outline Case Submission - All DCC Internal approvals complete. Strategic Outline Case issued to the Department for review. (22 Dec 2023)
 - e. FSM - DESNZ decision on non-Objection to Strategic Business Case Non-objection to SOC confirmed by DESNZ. (26 Jan 2024)

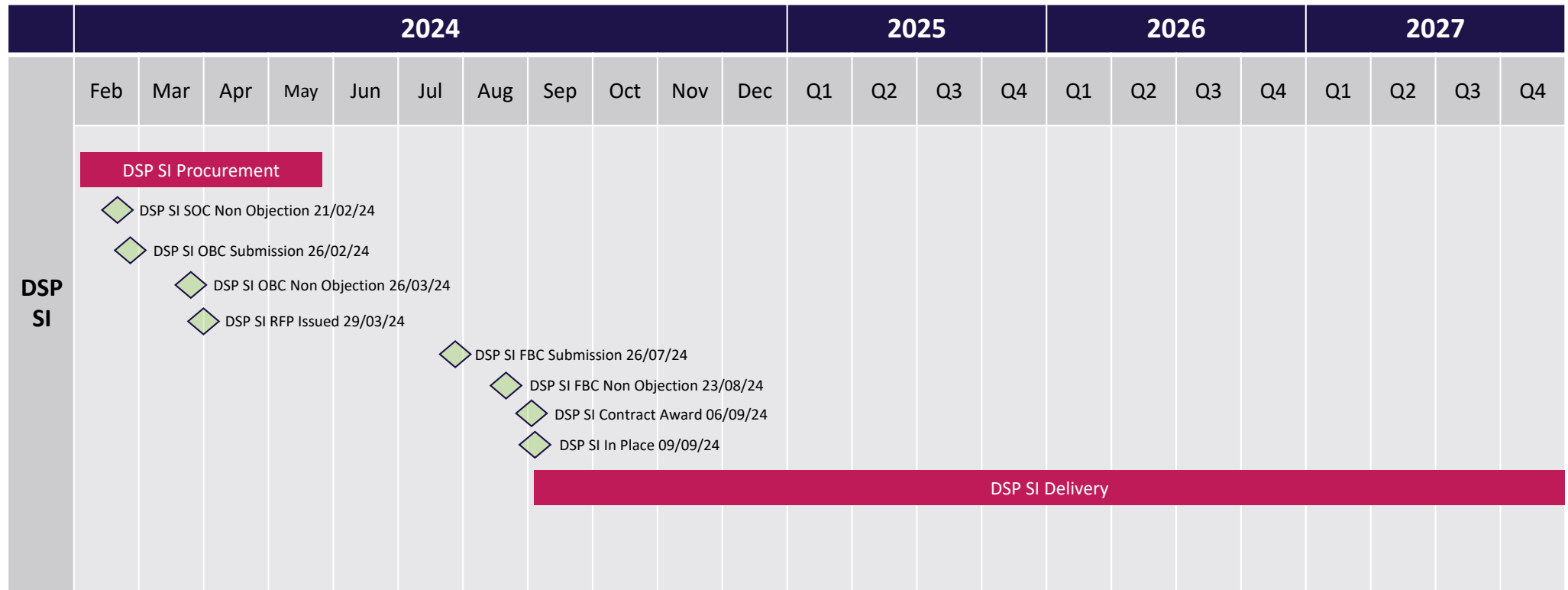
4. Next Steps

57. The Secretary of State will shortly make a determination on whether or not to approve the plan. When approved, the plan will be incorporated into the Joint Industry Plan and its progress monitored through SMIP Transitional Governance.

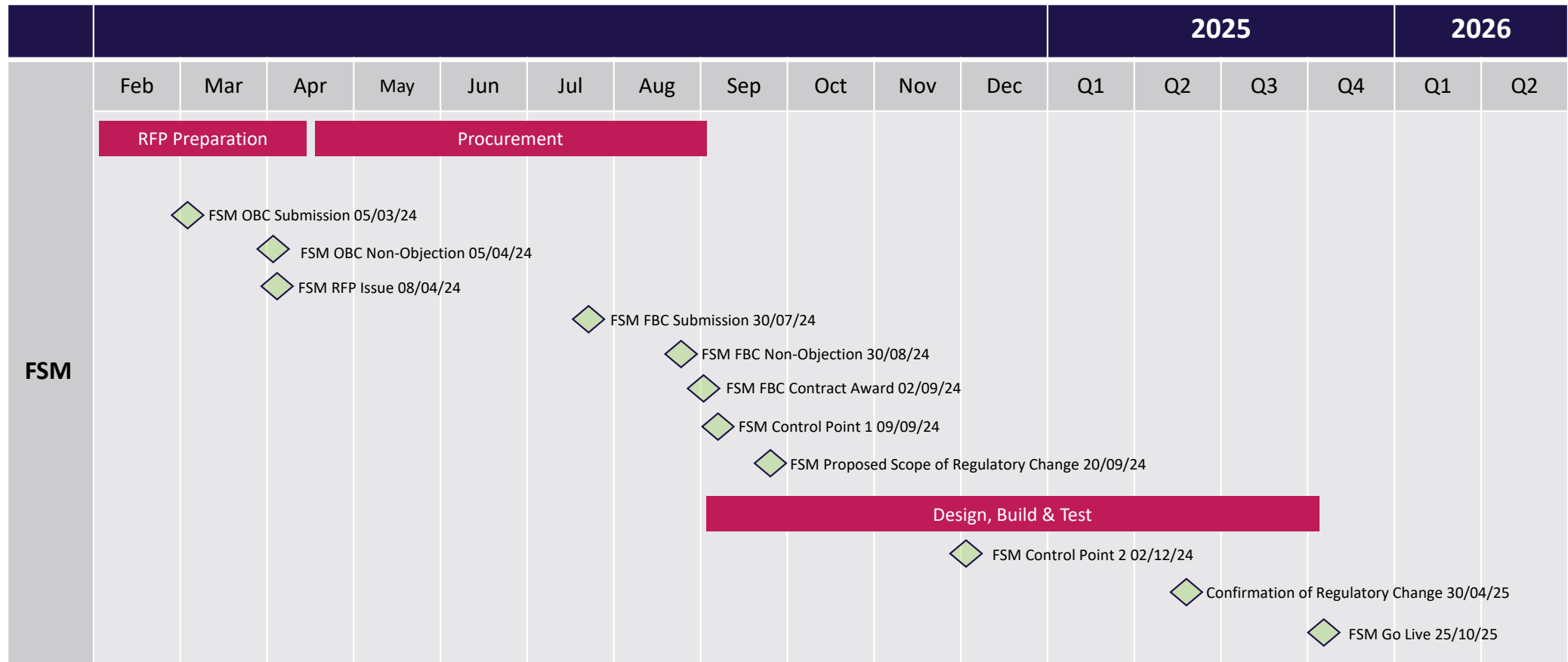
Appendix A – Plan on a Page (DSP)



Appendix A – Plan on a Page (DSP SI)



Appendix A – Plan on a Page (FSM)



Appendix B – Licence Condition 13B Milestone Table

Programme Key	
DS Programme	Data Systems Programme The main Programme that will deliver the replacement DSP data systems service.
FSM Programme	Future Service Management The Programme that will deliver the replacement DCC Service Management System (DSMS)
DSP SI Sub-Programme	DSP SI Sub-Programme Systems Integration Programme. The sub-Programme that will appoint a Systems Integrator (SI).

#	Key Milestones	Description	JIP Y/N	Revised LC13B Date
1	DSP SI Sub-Programme – DESNZ decision on non-Objection to Strategic Business Case	Non-objection to SOC confirmed by DESNZ.	Y	21 Feb 2024
2	DSP SI Sub-Programme – Outline Business Case Submission	All DCC Internal approvals complete. Outline Business Case issued to the Department for review.	Y	26 Feb 2024
3	FSM – Outline Business Case Submission	All DCC Internal approvals complete. Outline Business Case issued to the Department for review.	Y	05 Mar 2024
4	Data Systems – RFP, Stage 1 Complete	Second down selection has completed.	N	22 Mar 2024
5	DSP SI DBT Sub-Programme – DESNZ decision on non-Objection to Outline Business Case	Non-objection to OBC confirmed by DESNZ.	Y	26 Mar 2024
6	DSP SI Sub-Programme -RFP Issued	RFP Issue for the DSP SI Sub-Programme.	Y	29 Mar 2024
7	Data Systems – Transitional Engagement Commenced	Stakeholder Engagement commenced in relation to DSP Transitional Arrangements.	Y	01 Apr 2024
8	FSM -DESNZ decision on non-Objection to Outline Business Case	Non-objection to OBC confirmed by DESNZ.	Y	05 Apr 2024
9	FSM – RFP Issued	RFP Issue for the FSM Programme.	Y	08 Apr 2024

10	Data Systems – DSP Contract Extension Agreed	DCC has agreed an extension to the existing DSP contract subject to LC16.6A-C, where required.	N	18 Apr 2024
11	DSP SI Sub-Programme – Full Business Case Submission	All DCC Internal approvals complete. Full Business Case issued to the Department for review.	Y	26 Jul 2024
12	Data Systems – RFP, Stage 2 Complete	Preferred provider for each Lot has been selected.	N	26 Jul 2024
13	FSM – Full Business Case Submission	All DCC Internal approvals complete. Full Business Case issued to the Department for review.	Y	30 Jul 2024
14	DSP SI Sub-Programme – DESNZ decision on non-Objection to Full Business Case	Non-objection to FBC confirmed by DESNZ.	Y	23 Aug 2023
15	Data Systems – RFP, Stage 3 Complete	Completion of final contractual arrangements for each Lot in advance of contract award.	N	23 Aug 2024
16	Data Systems – CIO Appointed	DCC will have appointed an organisation to provide CIO services as per SEC security assessment requirements including to work with the CIO, SMKI PMA and SSC to confirm the assessment scope.	Y	30 Aug 2024
17	Data Systems – SEC Panel engagement completed prior to FBC	SEC Panel are updated and their views on the cost/benefit to Users of the solution options considered by DCC, and the transition approach are captured and considered before submission of the Full Business Case. SEC Panel and Panel Sub-Committee will be notified should the solution change at any point prior to this.	Y	30 Aug 2024
18	FSM – DESNZ decision on non-Objection to Full Business Case	Non-objection to FBC confirmed by DESNZ.	Y	30 Aug 2024
19	Data Systems – Full Business Case (FBC) Submission	Delivery Full Business Case to DESNZ for non-objection.	Y	02 Sep 2024
20	FSM – Award Contract	Contract signed and awarded, commence vendor onboarding.	Y	02 Sep 2024
21	FSM – Control Point 1 (Contract Award)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to DESNZ.	Y	09 Sep 2024
22	DSP SI Sub-Programme – Award Contract	Contract signed and awarded, commence vendor onboarding.	Y	06 Sep 2024
23	DSP SI Sub-Programme – Systems Integrator in place	System Integrator service is ready to support DSP Procurement and planning for Design, Build & Test.	Y	09 Sep 2024

24	FSM - Proposed scope of regulatory change	DCC will issue a consultation conclusions document, which details the complete high-level regulatory change and the roadmap for future engagement on regulatory change drafting and implementation.	Y	20 Sep 2024
25	Data Systems – DESNZ decision on non-Objection to Full Business Case	Non-objection to FBC confirmed by DESNZ.	Y	30 Sept 2024
26	Data Systems – Contracts Award	Contracts signed and awarded, commence vendor onboarding for all 3 Lots.	N	31 Oct 2024
27	Data Systems - Control Point 2 ¹ (Contract Award)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to DESNZ.	Y	01 Nov 2024
28	Data Systems - Proposed scope of regulatory change	DCC will issue a consultation conclusions document, which details the complete high-level regulatory change and the roadmap for future engagement on regulatory change drafting and implementation.	Y	30 Nov 2024
29	FSM – Control Point (Detailed Design)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to DESNZ.	Y	02 Dec 2024
30	Data Systems – PIT Entry	Latest possible date for PIT to start for all Service Providers.	Y	08 Jan 2025
31	Data Systems – Control Point 3 (Detailed Design)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to DESNZ.	Y	15 Feb 2025
32	FSM – Confirmation of regulatory change	DCC will issue a conclusions document on the regulatory drafting changes needed for the FSM Programme along with conclusions on plans for implementation of those regulatory changes.	Y	30 Mar 2025
33	Data Systems Latest confirmation of regulatory change	Latest point DCC will issue a conclusions document on the regulatory drafting changes needed for the DSP Programme along with conclusions on plans for implementation of those regulatory changes.	Y	31 Aug 2025
34	Data Systems – Design and Build Complete.	All SPs have completed all Design and Build activities.	N	08 Aug 2025
35	Data Systems – Interim CIO report	An Interim CIO report will be shared with the SSC.	Y	20 Aug 2025
36	Data Systems – PIT Exit	Latest possible date for PIT completion decision for all SPs by the designated governance body as advised by DESNZ.	Y	08 Sep 2025

¹ Data Systems - Control Point 1 Utilised during 2022.

37	Data Systems – SIT Entry	Latest possible date for SIT start for all SPs.	N	29 Sep 2025
38	FSM - Go Live	All capabilities live.	Y	25 Oct 2025
39	Data Systems – SIT Exit	Latest possible date for SIT completion decision for all SPs by the designated governance body as advised by DESNZ.	Y	21 Jun 2026
40	Data Systems – User Testing Start	Last point at which User Testing starts.	Y	14 Jul 2026
41	Data Systems – CIO report and remediation plan submitted	CIO report and remediation plan submitted. The first complete CIO report and remediation plan is submitted to the SMKI PMA and SSC.	Y	14 Jul 2026
42	Data Systems – User Testing Complete	Latest possible date for Window for user testing closed.	Y	16 Sep 2026
43	Data Systems – Submission of Go Live Services Criteria Document	SEC Panel to consider the evidence submitted by DCC against Go live service criteria and make a recommendation to DESNZ.	Y	30 Sep 2026
44	Data Systems – Live Service Criteria: Go-live decision	Response from DESNZ for approval prior to deploying changes to Live systems, following SEC Panel recommendation.	Y	28 Oct 2026
45	Data Systems – Go Live	All capabilities live.	Y	30 Oct 2026
46	Data Systems – Transition and Migration Start	Latest possible start of 1) transition from old system components to new system components, and 2) migration of Users and Smart Metering Systems to the new solution.	Y	02 Nov 2026
47	Data Systems – Transition and Migration Complete	Transition from old system to new system complete and migration of Users and Smart Metering Systems to the new solution complete.	Y	30 Oct 2027