

Consultation

SEC Variation Testing Approach Document for the Enduring Change of Supplier (ECoS) Arrangements

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1. Background and context

The “Enduring Change of Supplier” (ECoS) arrangements are changes to the process that the DCC follows when a consumer changes energy supplier and the new energy supplier seeks to take over control of the Smart Meter and other Devices in the consumer premises.

When a gas or electricity consumer with a Smart Meter switches energy supplier, the security information held on the Smart Meter needs to be changed so that it relates to the new energy supplier and not the old one. The processes that are currently in place for managing the change of security information held on Smart Meters are referred to as the “Transitional Change of Supplier” (TCoS) processes and they are administered by part of the DCC Systems known as the “change of supplier party” (COS Party).

As their name suggests, the existing TCoS processes were intended to be temporary. Changes to replace the existing TCoS arrangements to the enduring solution are already underway. Following a direction issued by the Secretary of State under condition 13A of the DCC licence, on 1 August 2019 the DCC published a consultation on its draft plan for its delivery of the ECoS arrangements. Following this consultation, the Secretary of State approved the plan on 30 March 2020.

The DCC has mobilised its project to implement the ECoS arrangements.

2. Introduction

Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the Smart Energy Code (SEC), the Secretary of State has directed the DCC to develop and provide a draft SEC Variation Testing Approach Document (SVTAD) in respect of variations to the SEC to deliver the ECoS Arrangements, for submission to the Secretary of State for approval no later than 4 June 2021, following DCC consultation with SEC Parties.

The SVTAD for ECoS is a high-level framework for the testing for the Secretary of State directed changes and will require the production of a document, a Testing Approach Document (TAD), to contain the detailed testing approach and to be developed by the DCC.

It is acknowledged that the SEC variations to support the ECoS Arrangements may be implemented at the same time as a number of SEC Modifications and that for convenience it may be appropriate for the TAD to also set out tests that are required to support these wider changes. The ECoS TAD’s scope may therefore be expanded to incorporate the TAD for the accompanying SEC Release. The TAD would therefore include details of the actual tests required for both sets of changes. This means that the DCC and Parties will only have a single test approach to work towards.

This consultation is seeking views on the DCC's proposal for the draft SVTAD for the ECoS Arrangements that the DCC has been directed to draft by the Secretary of State. This consultation also seeks views, on behalf of the Secretary of State, on the date for designation of the SVTAD, which would bring it into legal effect. A draft Direction is attached to this consultation in Attachment 1.

The closing date for this consultation is Friday, 14 May 2021.

3. General Requirements of the SVTAD for the ECoS Arrangements

The ECoS SVTAD sets out:

- the framework for the testing that is required to be undertaken for the introduction of the ECoS Variations. These are the variations to the SEC that are planned as part of the introduction of the ECoS Arrangements, including those changes that will apply during the period of ECoS Migration and any additional DCC capability to give effect to the migration.
- the arrangements that apply to the development of the ECoS TAD; and
- the rules to apply to the development of any ECoS Mandated User Testing.¹

3.1. Framework and Arrangements for Developing the ECoS Test Approach Document

The draft ECoS SVTAD requires the DCC to produce a draft ECoS TAD for the Department of Business, Energy & Industrial Strategy (BEIS) led changes, which can form part of a wider TAD covering the accompanying SEC Release. The reason for this approach is so that a single TAD can be produced for the Release that supports both SEC modifications and BEIS changes, recognising that the TAD will be subject to two different governance regimes (the governance prescribed by the ECoS SVTAD in respect of the BEIS changes, and the governance prescribed by Section D of the SEC in respect of the Modifications).

3.2. Governance and Approval of the ECoS provisions of the TAD

DCC will consult with industry on the draft ECoS TAD through the SEC Panel's Testing Advisory Group (TAG). DCC is planning to provide a draft ECoS TAD for an initial TAG review.

The ECoS TAD will contain the ECoS scope requirements for the testing of new functionality, the migration process, and the processing of the registration data. The processing of registration data will be dependent on whether the source of data is extracted from the Registration Data Providers (a contingency solution that will be developed and as outlined in the SEC currently), or from the enduring Central Switching Service (CSS) process. Currently, to enable a change of supplier using the TCoS Registration Data Provider data feeds are used to provide Registration

¹ See 'User Testing', Section, as initially, User Testing will not be Mandated

data to the DSP. Once the CSS is operational, these data feeds will be replaced by messages provided by the CSS, and changes will need to be made to the SEC accordingly.

As required by the ECoS SVTAD, the DCC will submit the proposed final ECoS TAD (and any subsequent version of it) to the TAG for approval insofar as it relates to any testing associated with the introduction of, or migration to, the ECoS Arrangements.

Where the TAG and DCC reach an agreement, the relevant draft ECoS TAD will be updated by DCC and deemed to be final. For any disagreements between TAG and DCC over the ECoS related content of the TAD, it will be submitted to the Secretary of State for a final and binding determination.

Any necessary revisions to the ECoS TAD will be submitted to TAG by DCC for agreement. As with the approach to agreeing the initial ECoS TAD, any disagreement would again be referred to the Secretary of State for final determination.

3.3. User Testing

User testing means testing by one or more Users of all or part of any changes to the DCC Total Systems that occur as a result of the ECoS Arrangements. It is not initially proposed to mandate any User Testing in the SVTAD/TAD for ECoS. However, the SVTAD sets out that each Supplier Party shall, where and to the extent reasonably requested by the DCC, provide information relating to whether it intends to carry out testing of its User Systems in order to verify that it will be able to successfully submit "CoS Update Security Credentials" Service Requests under the ECoS Arrangements and have them successfully processed. We expect user testing to focus on users' ability to successfully run CoS Update Security Credentials Service Requests (SRV 6.23) under the new ECoS arrangements. The expectation is that Supplier Parties will wish to demonstrate this themselves without the need to be mandated to do so.

In the unlikely situation that the DCC considers that Mandated User testing is required, prior to the implementation of the ECoS changes going live, we will set out our proposals for User testing in a draft ECoS Mandated User Testing Document, including those Users that should be required to participate in the testing and the User Role in which they are required to participate. This will include the approach to testing; the arrangements for test completion; the process for resolving test disputes; and notification of test completion.

In the unlikely event that a ECoS Mandated User Testing Document is required, the DCC would consult with the TAG, Parties and other relevant stakeholders before submitting the document to the Secretary of State. Should the Secretary of State approve/designate the document, then compliance with it shall be required. As stated above, the current view is that Mandated User testing will not be necessary for the ECoS Arrangements. However, the rules and information to be provided to DCC are included in the ECoS SVTAD for flexibility, should views subsequently change.

3.4. Test Completion

It is proposed that the SEC Panel (Panel) will decide on DCC test completion in respect of the ECoS Variations set out in the ECoS TAD. If there are outstanding areas of disagreement, these will be referred to the Secretary of State for final determination.

Completion of the testing for the changes set out in the ECoS TAD will only be complete when the Panel determines the Exit Criteria set out in that document for testing have been met.

The proposed process the DCC will follow is outlined below:

- A Completion Report will be prepared by the DCC. The Secretary of State, the Authority, the Panel, and the Parties will be notified by the DCC that we consider that testing has been completed. A copy of the Completion Report will be sent to the Authority, the Panel and the Secretary of State.
- The DCC will review the supporting documentation and evidence with regards to the relevant Exit Criteria with the TAG.
- Panel decision:
 - If the Panel is satisfied with the Completion Report, it will confirm the completion of testing for the ECoS changes. The Completion Report will be updated by the DCC and deemed to be final.
 - If the Panel highlights any issues or requires changes to the Completion Report in respect of the ECoS changes and the DCC agrees, the DCC will update the Completion Report to reflect resolution of any issues.
 - If the Panel believes that the Exit Criteria have not been met in respect of the ECoS changes, and the DCC and Panel disagree on this, the matter may be referred to the Secretary of State for determination. Alternatively, the DCC may continue with testing.
- Referral to the Secretary of State for determination:
 - If the Secretary of State agrees that testing for the ECoS changes is complete, then the relevant completion report will be updated by the DCC as necessary and the contents relating to the ECoS changes will be deemed to be final.
 - If the Secretary of State disagrees that testing for the ECoS changes is complete, then the DCC will continue with testing.
 - The DCC will publish the final Completion Report and notify the Panel, the Secretary of State, the Authority and the SEC Parties of the publication of the report.

4. Next Steps and Approval of the ECoS SVTAD

Following the closure of this consultation, the DCC will consider respondents' views, and subject to the consultation responses received, submit to BEIS the SVTAD for ECoS that it considers suitable for designation into the SEC, including why the DCC considers the draft to be fit for purpose; copies of the consultations responses received; and any areas of disagreement that arose during the consultation process that have not been resolved.

The DCC will conclude on this consultation, providing a report to BEIS no later than 4 June 2021.

The DCC has discussed the designation of the SVTAD with BEIS and it is proposed that, subject to the timely receipt of the DCC's conclusions report on this consultation, BEIS will designate the SVTAD on 11 June 2021 or as soon as reasonably practicable within one month thereafter. The draft Direction is presented in Attachment 1 of this consultation document for stakeholder consideration.

There may be further changes to the detail of the SEC variations needed to support the introduction of and migration to the ECoS Arrangements as the project to implement them progresses and the DCC will discuss any such changes with BEIS. It may consequently be necessary for DCC to update the SVTAD in accordance with the process for the modification of that document that shall be specified in it.

5. Questions for Respondents

The DCC would like stakeholders' views on the following consultation questions:

Q1	Do you agree with the proposed SVTAD for ECoS? Please indicate any areas of disagreement and the reasons for them.
Q2	Do you agree that the ECoS TAD should also be capable of setting out the testing approach that is required to support any SEC Modifications that are implemented at the same time as the SEC variations for the ECoS Arrangements? Please indicate any areas of disagreement and the reasons for them.
Q3	Do you agree with the proposed designation date of 11 June 2021 for the SVTAD for ECoS (or, if necessary, as soon as reasonably practicable within one month thereafter)?

6. How to Respond

Please provide responses by **16:00 on 14 May 2021** to DCC at consultations@smartdcc.co.uk.

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

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk

7. Attachment 1 - Draft legal text direction and designation for ECoS SVTAD

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22.27 of the DCC Licence and Section X5.4 of the SEC, the Secretary of State directs that the document set out at **Annex A** in this direction is hereby designated as the ECoS SEC Variation Testing Approach Document, and shall be incorporated into the SEC as Appendix [TBC] with effect from **11 June 2021**.

This direction is also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SECAS website in due course.