

Changes to the proposed date for the commencement of Pending Product Combinations Tests Services and Device and User Testing Services for SMETS1

DCC conclusions and recommendation to Secretary of State

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1 Executive Summary

DCC ran a consultation from 31 July to 15 August 2018 in accordance with Sections H14.31 and H14.36A of the Smart Energy Code (SEC), which proposed that the date that the DCC should start providing both Device and User System Testing and the Pending Product Combinations Tests (PPCT) Services for SMETS1 should be changed from of the 31 August 2018 to 30 November 2018.

This document forms DCC's recommendation to the Secretary of State to change of date that DCC must make SMETS1 Device and User System Tests and Pending Product Combinations Tests available for SMETS1. It is submitted in accordance with sections H14.31 & H14.36A of the SEC.

In order to provide stakeholders with a complete and meaningful response, DCC is including within this document the conclusions it has reached in respect of the consultation question on Pending Product Combinations Tests and Device and User System Tests for SMETS1, having taken into account consultation feedback.

2 Background and document structure

In the initial stages of the smart meter roll-out across Great Britain, several Energy Suppliers installed first generation smart devices (known as SMETS1 devices) in consumers' homes. These meters are, or will be, SMETS1 compliant and currently operate outside of the Data Communications Company (DCC). While this approach has driven out early learnings and benefits, SMETS1 meters installed by one energy supplier are not always supported by another's systems. This sometimes results in consumers losing their smart functionality when they switch energy suppliers. DCC considers that there are important shared benefits for industry and consumers from the enrolment of SMETS1 meters into a DCC Service; particularly the ability for all SMETS1 customers to maintain their smart services following a decision to switch suppliers. DCC is therefore developing SMETS1 Services to facilitate testing and the incorporation of such devices into its data and communications service to ensure these shared benefits for industry and consumers continue.

This document comprises the following core sections:

- an outline of the consultation process and DCC's proposal to change the commencement date for the PPCT Service and Device and User System Testing Services for SMETS1 to 30 November 2018;
- The question that was asked, together with a summary of respondent's views and DCC's responses to these;
- DCC's recommendation to the Secretary of State; and
- Next Steps.

Provided along with this document is the consultation feedback and response tracker document.

3 Outline of Consultation process & rationale behind DCC's proposal

DCC issued a formal consultation on its website on 31 July 2018. Parties were notified of its release by email. The consultation ran for 2½ weeks and closed on 15 August 2018.

DCC asked one specific question which highlighted its key proposal and received 2 comments in writing from 2 separate parties in response to the consultation question.

3.1 Rationale behind DCC's proposal:

The current DCC SMETS1 plan which was approved on 17 October 2017 targets the SMETS1 Initial Operating Capability (IOC) as going live at the end of November 2018 and the Middle Operating Capability (MOC) at end March 2019. At the BEIS Implementation Managers Forum on 28 June 2018 and as subsequently discussed between DCC and BEIS, there are several issues that have impacted DCC's ability to deliver IOC and MOC to these target dates. These include the risk of environment contention with R2.0 and the risk of a delayed to the integration testing of DCO software (in the SIT environment). DCC also anticipates that migration testing, which is still in the process of being defined, procured and planned for, may compound delay beyond SIT. In light of these issues, DCC considers that the current plan approved on 17 October 2017 can no longer be maintained. This in turn has an impact on DCC's ability to meet the obligation to provide PPCT and Device and User System Testing Services for SMETS1 by 31 August 2018. In interim measure was to propose an extension of this date to 30 November 2018 to ensure the DCC would not be in breach of the SEC whilst it planned for the proposed re-consultation of the Licence Condition 13 Plan (LC13 Plan).

In addition to the rationale set out above, DCC considers that, until the DCC interface is proven fit for production through Interface Testing (which will be necessary following its amendment to incorporate SMETS1 Services), no new Device Model Combination should be tested as part of the PPCT Service. This will ensure that any new Device Model Combination introduced into that customer's estate will be subject to testing against a successful baseline. DCC considers that this would ensure that SMETS1 Services are able to be delivered in a way which provides maximum confidence to our customers.

4 Consultation questions and DCC conclusions

This section sets out the question DCC asked on the commencement date for PPCT and Device and User System Testing for SMETS1, summarises responses received, and sets out DCC's conclusions in light of those responses.

4.1 Question 1

DCC asked consultees: *Do you agree with the proposed revised date of the 30 November 2018 for the commencement of the Pending Product Combination Testing Service and Device and User System Testing Services for SMETS1?*

DCC received responses from 6 parties, 2 responded positively, 4, responded with qualified support. None responded negatively with issues.

One respondent felt that DCC's proposal seemed to be the correct approach in light of current planning issues DCC is tackling.

One respondent acknowledged that the successful enrolment of SMETS1 assets will rely on the co-ordinated delivery of activities across the DCC, SMSOs, Energy Suppliers and other industry parties and called for DCC to publish the revised LC13 plan and key documents as soon as possible. Additionally, one respondent noted that they had already communicated on a number of occasions, that they still require a baselined Transition and Migration Approach (the TMAD) before they can start their design and development.

One respondent sought clarification as to what the term 'User System Testing Services for SMETS1' as noted in this consultation' means.

Several respondents raised concerns about how PPCT and Device and User Systems Testing would work in relation to DCC's Testing Approach to SMETS1, noting that further information on the overall DCC Test Approach was needed. The respondents requested this information as well as sufficient time to review and comment on it.

Four respondents wished to see the revised LC13 plan and queried how the date of 30 November 2018 accounted for their arrangements, factored in the issues DCC is currently dealing with (e.g. firmware issues) and how the date fitted in with the current review and LC13 re-plan.

DCC conclusions: DCC acknowledges the importance of industry and stakeholders having sight of, and sufficient time to review, the SMETS1 Testing Approach Documents. DCC can confirm that the consultation on the User Testing Services Approach Document for SMETS1 Services and associated changes to SEC subsidiary documents to facilitate the provision of SMETS1 Services is due to open at the end of August 2018 and will run for 4 weeks. This suite of documents sets out in detail, amongst other things, that:

- User Systems Tests comprise of SMETS1 as Eligibility Testing (which is essentially User Entry Process Testing) and SMETS1 Interface Testing;
- Device and User System Testing Services for SMETS1 relate to the provisions set out in sections H14.31 to H14.33A of the SEC, and are how a Party tests the interoperability of their user systems with DCC Systems and Devices (this is also known as End-to-End testing in SMETS2+); and
- PPCT is a new test service being provided by DCC to enable Testing Participants to submit a new Device Model Combination(DMC) that is not currently deployed in the field to DCC. For clarity, DCC will then schedule and undertake testing to confirm the DMC's interoperability with DCC Systems.

The revised LC13 will detail when SMETS1 services will be made available including PPCT, Device and User System Testing, Eligibility Testing and migration testing.

DCC acknowledges the importance of industry and stakeholders having sight, as soon as possible, of the proposed changes to the LC13 plan and DCC will be consulting on proposed changes once re-planning activity is complete. DCC proposed a date of 30 November as the revised commencement date for PPCT and Device and User Systems Testing Services for SMETS1 prior to the completion of its re-planning activity in order to ensure that the regulatory requirements in relation to the service were aligned with DCC's ability to deliver them. The LC13 plan consultation will factor in the delivery and impact of both PPCT and Device and User Systems Testing Services for SMETS1 into the overarching plan, to which Parties will be able to respond, providing a further

opportunity to consider their arrangements. If it is necessary to do so, DCC may seek to revise the start date of 30 November as part of the finalisation of the new LC13 Plan.

DCC is pleased to note that the views expressed are broadly in accordance with the proposal to extend the commencement date for SMETS1 PPCT Services and Device and User Systems Testing. DCC would like to reassure all Parties that the concerns raised have been taken into account and will be addressed in the upcoming LC13 Plan consultation and the User Testing Services Approach Document for SMETS1 Services and SEC Subsidiary Documents Consultation.

5 DCC Recommendation

In light of consultation responses received, and DCC's conclusions, **DCC recommends that commencement date for Pending Product Combinations Tests Service and Device and User System Testing Services for SMETS1 should be revised and should commence on 30 November 2018.**

6 Next Steps

Following the submission of DCC's recommendation to the Secretary of State, DCC expects the Secretary of State to make a decision on whether to accept the proposed date change. DCC shall shortly be consulting on the proposed changes to the LC13 Plan. The LC13 Plan consultation will include the proposed dates for Pending Product Combinations Tests and Device and User Systems Test to ensure that these dates align with the overall LC13 Plan.