

Consultation

On the User Testing Services Approach Document for SMETS1 Services DRAFT v0.1

Consultation opens: 24 August 2018
Consultation closes: 21 September 2018

Date: 22 August 2018

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1 Introduction and context

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 has therefore developed a plan and designed a solution, for the incorporation of such devices into its data and communications service as the use of this service provides important shared benefits for industry and consumers. Second generation (or SMETS2) meters operate via the DCC's service and facilitate the provision of smart services as consumers switch between suppliers.

In addition to the changes made by the Secretary of State to Section H14 of the Smart Energy Code (SEC) and the DCC's consultations on the SEC Variation Testing Approach Document (SVTAD) for the purposes of SMETS1 Services, DCC has developed a User Testing Services Approach Document (UTSAD) as part of a suite of documents which sit under the SVTAD. The UTSAD sets out the rights and obligations of the DCC and users in the User Testing Services (UTS) Test Phase. Wherever it has been possible, DCC has aligned the design of the SMETS1 Services with the existing SMETS2 services.

The UTSAD specifically sets out the information required under Section X11.5 of the SEC and includes:

- the test activities that are undertaken during the User Testing Services Phase;
- the testing environment(s) used for the undertaking of Eligibility Testing;
- rights to participate in testing;
- the Entry Criteria that need to be met before the SMETS1 User Testing Services Test Phase can begin;
- the Exit Criteria to be satisfied for the completion SMETS1 Interface Testing;
- the roles, responsibilities and obligations of the DCC and of a Party in respect of SMETS1 Interface Testing and Eligibility Testing;
- the details of the evidence to be presented to the Panel for SMETS1 Interface Testing completion; and
- reporting requirements for Eligibility Testing and SMETS 1 Interface Testing.

To support the rights and obligations set out in the UTSAD, a range of SMETS1 specific changes will be introduced to two SEC Subsidiary Documents (SSDs): The Common Test Scenarios Document (CTSD) and the Enduring Test Approach Document (ETAD). Following this consultation, the UTSAD, CTSD and ETAD will be updated in light of the comments received. The UTSAD will then be submitted to the Secretary of State for approval under the process set out in section 3 of the SVTAD. The CTSD and ETAD will be proposed for baselining under the governance of the Technical Business Design Group (TBDG). In accordance with Condition 22 of the DCC Licence and Section X5 of the SEC, it is the intention that the CTSD and ETAD would be

re-incorporated into the SEC. DCC expects the CTSD and ETAD will be re-incorporated alongside changes to the main body of the SEC that are required to support DCC's provision of Services in relation to SMETS1 Devices.

2 Consultation Structure

This consultation document constitutes DCC's formal consultation on its User Testing Services Approach Document for SMETS1 Services which DCC proposes will allow the SMETS1 Service to be delivered in the most economic and efficient way possible and includes the proposed changes made to the Common Test Scenarios Document and the Enduring Test Approach Document in order to enable the provision of SMETS1 Services.

The closing date for responses is 21 September 2018.

This consultation has the following components:

- An Introduction (section 1);
- a summary of DCC's development of, and engagement with stakeholders in relation to this document (section 3);
- Section 4, provides an overview of what is set out in the UTSAD;
- Section 5 is a high-level summary of the proposed changes to the CTSD and ETAD; and
- Section 6 sets out the questions DCC is seeking views on regarding the UTSAD and the changes to the CTSD and ETAD.

3 Development and stakeholder engagement

DCC has continued to liaise with its customers, BEIS, the SEC Panel and its sub-committees to further refine the design of SMETS1 services. DCC has also sought and received approval from the SEC Panel in April 2018, based on a recommendation by the Panel's Testing Advisory Group (TAG), on our central proposal for SMETS1 Interface Testing Exit Criteria in the User Testing Services Test Phase.

In order to provide stakeholders with sufficient time to contribute to the development of the UTSAD and the proposed changes to the CTSD, a workshop to discuss aspects of the UTSAD was held on 7 June and early versions of the UTSAD and CTSD were shared with industry in June 2018 for information. DCC has also been providing progress updates on the development of the UTSAD, CTSD and ETAD to the Testing and Design and Assurance Execution Group (TDEG) and TAG in June and July 2018; to the Small Supplier Forum in June 2018; and at bi-lateral meetings with our customers.

DCC, in liaison with our customers and BEIS, is also developing a complementary suite of documentation that will set out the SMETS1 testing approach in other areas including the updates to the Migration Test Approach Document and the Systems Capacity Testing Approach Document which are due to be consulted on later in 2018.

4 User Testing Services Approach Document.

The UTSAD for SMETS1 Services focusses on two types of testing: Eligibility Testing¹ and SMETS1 Interface Testing,² which together comprise the User Testing Services. The UTSAD also sets out the rights and obligations for the User Testing Service phase which include:

- the test activities that are undertaken during the User Testing Services phase;
- the testing environment(s) used for the undertaking of SMETS1 Eligibility Testing and SMETS1 Interface Testing;
- the rights to participate in testing;
- the Entry Criteria to be satisfied before starting Eligibility Testing and SMETS1 Interface Testing;
- the Exit Criteria to be satisfied for the completion of SMETS1 Interface Testing;
- the roles, responsibilities and obligations of the DCC and of the Parties undertaking Eligibility Testing and SMETS1 Interface Testing;
- the evidence to be presented to the Panel in respect of SMETS1 Interface Testing completion; and
- reporting requirements for Eligibility Testing and SMETS 1 Interface Testing.

Several matters, such as Testing Issue Thresholds and Testing Issue Resolution apply to all Test Phases and are set out in the SVTAD for SMETS1 Services. As these matters have been addressed in the SVTAD, they are not duplicated in the UTSAD and as a result the UTSAD is a shorter document that should be read in conjunction with the SMETS1 SVTAD. To provide assurance that the matters covered in the SVTAD for SMETS1 Services relate to the UTSAD, clause 3.2 of the UTSAD sign-posts the linkages between the two documents. This consultation document sets out a summary of the key points, rights and obligations contained in the UTSAD which are set out thematically below.

Respondents to this consultation should consider the relevant clauses in the SVTAD when providing comments on the UTSAD.

UTS Test Phase Environment:

Testing Participants will be able to use the UTS Test Phase Environment for Eligibility Testing (which will consist of testing Service Requests, Service Response and Service Alerts) and SMETS1 Interface Testing.

The UTS Test Phase will use the UIT environment for Eligibility Tests and SMETS1 Interface Testing. Before the UTS Test Phase opens for testing by Test Participants, DCC will go through a test phase entry gate and must ensure that it has fulfilled the SMETS1 UTS Entry Criteria which are set out fully in Table 5.1 of the UTSAD and include:

¹ Eligibility Testing comprises the undertaking of tests to demonstrate that a Party can successfully send Service Requests and receive Service Responses and Alerts for SMETS1 Devices.

² SMETS1 Interface testing means the testing activity that further assures, through the involvement of Users, that the part of the Modified DCC Total System that comprises the DCC User Interface operates in accordance with the amendments made to the SEC.

- the completion of SMETS1 Systems Integration Testing (SIT) for the SMETS1 Initial Operating Capability (IOC) – and that the SEC Panel has approved the Completion report issued by DCC;
- that the SMETS1 code base has been approved for release into the User Interface Testing (UIT) environment by DCC’s Testing Advisory Board (TAB);
- the UIT environment has been uplifted to include SMETS1;
- Environment proving and UTS Test Phase preparatory activity conducted and completed by the relevant DCC Service Providers post SIT Exit; and
- formal notification from the Systems Integrator and other DCC Service Providers (including the test lab provider) that business / device test data has been loaded into DCC’s systems.

The UTSAD also obliges DCC Service Providers to offer support for the test activities required for the Test Phase: this includes the installation and removal of SMETS1 Device Model Combinations, from DCC test laboratories as well as analysing logs for Testing Issue resolution; and involvement in daily calls for Parties’ test planning.

Overlap of SMETS1 SIT and SMETS1 Interface Testing:

Where DCC considers that SIT and SMETS1 Interface Testing should overlap, it will follow the rules set out in in clause 5.7 of the SMETS1 SEC Variation Testing Approach Document (SVTAD) which states that prior review of the TAG and agreement of the Panel is required. In considering whether SIT and SMETS1 Interface Testing should overlap, if doing so requires further changes to the SMETS1 SVTAD and/or UTSAD, DCC will follow the process for amendments set out in clause 4 of the SMETS1 SVTAD: following consultation with Parties and other relevant persons, the Testing Advisory Group of the Panel, the Authority, and the Secretary of State.

Eligibility Testing:

DCC will provide Eligibility Testing Services in line with the provisions in Section H14 of the SEC. Eligibility Testing will be conducted in a DCC test lab with devices provided by DCC that have successfully exited SIT. The purpose of the tests is to show that Users can communicate with SMETS1 Devices via DCC’s User Interface in accordance with clause H3.3 of the SEC.

Eligibility Testing will be made up of User Entry Process Tests and the entry criteria for Eligibility Testing is detailed in clause 5.4.3 of the CTSD. The tests will include the 72 Service Requests (variants) which cover all user roles. Those undertaking the testing will run Service Requests relevant to each User Role. Each Party that has completed User Entry Process Tests for a particular User Role must successfully complete Eligibility Testing for that User Role before they can send Service Requests from SMETS1 Devices in that User Role. Other than where one Service Request needs to be executed in advance of testing another (i.e. to establish the test), DCC will not prescribe any sequencing of the Service Requests.

A Testing Participant can rely on another Party’s systems having completed Eligibility Testing or Eligibility-style Testing as part of Device and User Systems Testing, as is the case in SMETS2+, with an adapter provider, for example. In such cases, DCC strongly advises those who wish to place reliance in accordance with the provisions in the SEC to perform a set of pre-determined live tests to confirm their systems work as they should, as this will help reduce any potential issues when first connecting to the live environment. For Device and User Systems Testing

independently, Testing Participants are required to follow a controlled entry process into Device and User Systems Testing, that will be set out in the User Testing Services Guidance.

SMETS1 Interface Testing Requirements from the SVTAD

SMETS1 Interface Testing Exit Criteria were recommended by the SEC Panel's Testing Advisory Group (TAG), approved by Panel in April 2018 and are set out in the SVTAD for SMETS1 Services and are detailed for information below. In order to complete SMETS1 Interface Testing, a minimum of two non-affiliated parties in the role of Import Supplier and two non-affiliated Parties in the role of Gas Supplier, must successfully complete SMETS1 Eligibility Testing without any Severity 1 or Severity 2 Testing Issues. If there are other Testing Issues, these must be within the Testing Issue Threshold by DCC Service Provider for the UTS Phase which is set out in Table 13.2 of the SVTAD for SMETS1 Services and is replicated below for convenience:

Testing Issue Thresholds by DCC Service Provider

Test Severity	Issue/Defect	UTS - SMETS1 Interface Testing
1		0
2		0
3		5
4		10
5		20

The SVTAD additionally contains an obligation on all Large Suppliers to declare their status as such (Clause 13.26) and to take all reasonable steps to complete Eligibility Testing as soon as reasonably practicable (Clause 13.25)

The rules governing the maximum allowable number of Testing Issues permissible at Interface Testing Completion; how these will be assessed; and the governance activities for agreeing SMETS1 Interface Testing Completion are set out in the SVTAD.

Completion of SMETS1 Interface Testing will be assessed by the SEC Panel's Testing Advisory Group (TAG). The assessment shall include all open Severity 1-3 Testing Issues raised by any Testing Participant; all open Severity 4-5 Testing Issues raised by any Party that has completed Eligibility Testing; and any other Severity 1-3 issues that have arisen in DCC Live Systems.

TAG will then assess whether the correct severity levels have been assigned in order to decide which testing issues (if any) should be counted to decide whether the Testing Issue Threshold has been exceeded. TAG will then confirm whether the Testing Issue Threshold exit criteria for SMETS1 Interface Testing have been met. For Interface Testing Completion there can be no open Severity 1 or Severity 2 Testing Issues or production issues that could impact the deployment of the SMETS 1 Code. In the cases where TAG and DCC disagree on either the level assigned to each severity or whether or not the Testing Issue Threshold has been exceeded, the Secretary of State will make the final decision.

The SEC Panel will either confirm SMETS1 Interface Testing Completion or, if the Panel does not believe the Exit Criteria have been met, will instruct DCC to continue with SMETS1 Interface Testing in order to address any outstanding points. The Panel will have the right to require DCC submit further supporting documentation and evidence relating to SMETS1 Interface Testing Completion. It will then be for SEC Panel to decide, based upon the additional evidence submitted, whether SMETS1 Interface Testing has completed.

Two Appendices to the SEC have been amended to incorporate the testing of SMETS1 Devices and Device Model Combinations: The Common Test Scenarios Document (CTSD) and the Enduring Test Approach Document (ETAD). These documents are referenced throughout the UTSAD and a summary of the proposed changes are set out in section 5 below.

Device and User System Tests:

Requirements relating to Device and User System Tests are detailed in the ETAD and will apply for SMETS1 unless the requirements have been varied. The variations are set out in clause 4.7 of the UTSAD and highlighted in section 5 below. One particularly noteworthy variation is that unlike SMETS2+, DCC will not provide remote test lab connections to the SMWAN for SMETS1.

For SMETS1, DCC will provide a service that enables Testing Participants to test the interoperability of SMETS1 Devices with DCC Systems. Under SMETS1 arrangements, suppliers using Smart Metering Service Operators (SMSOs) provide the link between the supplier and Smart Metering Systems; the installing supplier for SMETS1 Communication Hubs and Metering Devices is responsible for that Smart Metering System and DCC is responsible for ensuring Devices interoperate with DCC systems. DCC will not provide a remote test laboratory service similar to that provided for SMETS2+; this is due to the fact that DCC is not a supplier of SMETS1 Communications Hubs. As a result, if a Testing Participant wishes to undertake their SMETS1 Device and User System Tests from a remote test laboratory, they will need to procure SMETS1 Device Model Combinations that are on the Eligible Product Combination List and that have an appropriately configured SIM card to access the simulation of the SMETS1 SM WAN. DCC understands that BEIS will be progressing a change to section H14.31 of the SEC to reflect this.

The UTSAD holds that for Eligibility Testing, Section H14.20 of the SEC (which related to User Entry Process Tests) applies. This means that where a Testing Participant has completed Eligibility Testing by placing reliance on another Party's systems that has successfully completed Eligibility Testing (e.g. with an adapter provider), or tests equivalent to Eligibility Testing. According to the UTSAD, if a Testing Participant then wishes to undertake Device and User System Tests they are required, to follow a process specified by DCC before they are to undertake Device and User System Testing in respect of SMETS1 Devices. The process provides additional support to enable Testing Participants, who have not previously used the DCC test environment, to understand the processes and procedures which in turn provides the Testing Participant with a trouble-free start to Device and User System Tests. The process will be set out in the User Testing Services Guidance which will be published on the DCC website.

DCC interface testing as described in the UTSAD for SMETS1 is deemed complete when a minimum of two non-affiliated Suppliers in role of Import Supplier and two non-affiliated Suppliers in role of Gas Supplier pass Eligibility Testing. There is currently no rule in the UTSAD that would prevent DCC from exiting Interface testing via Suppliers completing Eligibility Testing using equivalence on a Managed Service Provider. DCC recognises that whilst this would expedite its

exit of Interface Testing, this may not give industry the level of confidence it may wish to see prior to the code being released to the production environment. A question on this point is set out in section 6 below.

A significant change to highlight is the introduction into the Enduring Test Approach Documents of the new Pending Product Combinations Tests Service that DCC will provide.

SMETS1 Pending Product Combinations Tests (PPCT) Service

PPCT is a new enduring Testing Service, initiated by Testing Participants, that will be provided by the DCC where Testing Participants can bring their own Device Model Combination(s) to be tested where they are seeking to move to a later version of a Device Model(s) that comprises all or part of an existing entry on the Eligible Product Combinations List. BEIS are looking to progress a change to the existing Pending Product Combinations Section of H14 to specify this. A Testing Participant must provide a minimum of 30 Working Days' notice to DCC before they can expect to start testing. Where less than 30 Working Days' notice is provided, and this cannot be reasonably accommodated by DCC, DCC will notify of a revised start date which will be as soon as reasonably feasible after the requested start date. The PPCT service will also be open to a person that is not a Party provided they have signed a Service Enabling Agreement with the DCC in accordance with Section H14.7 of the Smart Energy Code.

Any Testing Participant submitting a Device Model Combination to DCC to test under the SMETS1 PPCT Service must have obtained from the manufacturers of each component of the DMC that they consent to having their name published on the PPCT test schedule because this schedule will be shared with industry. Publishing this information allows suppliers and manufacturers to check progress against a particular Device Model Combination and to make an informed decision on whether any other versions need to be submitted for Pending Product Combinations Tests. DCC will assume consent has been obtained before accepting the DMC for Pending Products Combination Tests and accepts no liability if the Testing Participant has not obtained it. If a manufacturer does not provide consent or does not wish to have its details published on the list, the Testing Participant will need to let DCC know when they notify for PPCT and the details will be anonymised in accordance with section M4 of the SEC.

A Testing Participant submitting a Device Model Combination to DCC must also supply and install the component Devices that make up that Device Model Combination in the DCC Test Laboratory and all its data to the DCC, and contact details for a nominated contact for DCC to liaise with during testing. As Testing Participant will also be asked to provide confirmation that the Device Model Combination is SMETS1 compliant. When the start date is confirmed, DCC will add the submitted Device Model Combination to the Pending Product Combinations List. There is no specific entry or exit criteria for PPCT. A Device Model Combination will either pass or fail, the result will be published in the PPCT test schedule and the DCC will inform the relevant Supplier and/ or manufacturer of this.

In cases where the testing of a Device Model Combination has been suspended due to a testing issue, testing will resume once DCC receives confirmation that the appropriate fixes have been applied and retested. Where it has been suspended because either an issue which arose as a result of a material change to the DCC's systems and / or there has been a modification to the SEC, DCC must re-start testing if a service-user asks DCC to.

5 High-level Summary of Proposed changes to the ETAD and CTSD

A summary of the proposed changes to Appendix R (the Common Test Scenarios Document) and to Appendix J (the Enduring Test Approach Document) of the SEC has been set out in the sections below.

5.1 Proposed SEC Subsidiary Document changes - Overview

5.1.1 Common Test Scenarios Document (CTSD)

Key areas of change in respect of CTSD are as follows:

Area of change	Rationale for change	Clause(s) affected in the CTSD
Introduction	To provide clarity on which clauses in the CTSD relate to SMETS1 and which to SMETS2+	All clauses
DUIS Matrix – Additional column added	To distinguish the Mandatory Service Requests that must be executed for SMETS1 for each specific User Role	Annex C Clause 8.1.4
DUIS Matrix	Insertion of SMETS1 CV submission rules to provide additional clarity for Users executing SMETS1 Service Requests to identify the mandatory command variants to be executed for SMETS1 Service Requests	Annex C Clause 8.1.4
Device Alert Tests	To distinguish which Device Alert Tests a User in a particular User Role is required to execute for SMETS1.	Annex C Clause 8.1.13 Clause 8.1.14 Clause 8.1.16
DCC Alert Tests	To distinguish which DCC Alert Tests the DCC is required to execute for SMETS1	Annex C Clause 8.1.19 to Clause 8.1.25
Response Code Tests	To distinguish which Response Code Tests a User in a particular User Role is required to execute for SMETS1	Annex C Clause 8.1.26

5.1.2 Enduring Test Approach Document (ETAD)

Key areas of change in respect of ETAD are as follows:

Area of change	Rationale for change	Clause(s) affected in the ETAD
Introduction	To provide clarity on which clauses in the ETAD relate to SMETS1 and which to SMETS2+	All clauses
Obligations on Testing Participants using Remote Test Labs	Sets out the type of service regarding the provision of connections to the SMETS2+ SM WAN and the SMETS1 SM WAN – DCC will not be offering this service for SMETS1.	Clause 5.1
User Entry Process Testing	Specifically distinguishes the devices for SMETS1 and SMETS2+ that DCC will provide.	Clause 7.1
Device and User System Tests	<p>Where a Testing Participant or a party that has signed a Service Enabling Agreement (in accordance with section H14.7 of the SEC) has passed Eligibility Testing by placing reliance and wishes to enter into Device and User Systems Testing independently, Testing Participants are required to follow a controlled entry process into Device and User Systems Testing, that will be set out in the User Testing Services Guidance, to confirm that they can successfully connect and execute Service Requests.</p> <p>Additional sub-clause added to ensure that Testing Participants of have placed reliance on a Managed Service Provider can chose to independently undertake Device and User Systems Tests via a controlled process should they wish to.</p> <p>For SMETS1 if a Testing Participant wishes to bring their own Device Model Combination for Device and User System Testing, that Device Model Combination must be on the Eligible Product Combinations List (EPCL)</p>	<p>Clause 8</p> <p>Clause 8.1(c)</p> <p>Clause 8.3</p>
Pending Product Combination Tests	To set out what is required by the DCC and parties wishing to undertake Pending Product	Clause 9

	Combination Testing including governance and resolution processes.	
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6 Questions for respondents

User Testing Services Approach Document	
Q1.	Do you support the overall approach of the User Testing Services Approach Document for SMETS1? If not, please outline the areas of concern and provide a rationale for your response.
Q2.	Do you agree that the DCC can exit from SMETS1 Interface Testing via Suppliers completing Eligibility Testing using equivalence on a Managed Service Provider? Please state the reasons for your views.
Common Test Scenarios Document (CTSD)	
Q3.	Do you consider that the Service Requests (SRs) and Alerts as detailed in the CTSD include all those that should be tested? If not, please state your reasons why, along with any SRs or Alerts you think are required or should be removed.
Q4.	Do you agree that the contents of table 8.1.4 'SMETS1 CV Submission Rules' in the CTSD is sufficient? If not please set out your rationale and what additional information should be added.
Q5.	Do you have any other comments on the proposed changes to the CTSD? Are you aware of any other issues, relating to the CTSD that should be addressed and/or considered? Please state your reasons why.
Enduring Test Approach Document (ETAD)	
Q6.	Do you agree with the approach for PPCT? If not, please state your reasons why and any suggestions you think could improve the service.
Q8	Do you agree with the restriction that a Testing Participant can only request the DCC to execute SMETS1 PPCT for a SMETS1 DMC where it is seeking to move to a later version of a Device Model that comprises all or part of an existing entry on the Eligible Product Combinations List? Please state the reasons for your view.
Q9.	Do you agree with the approach that a new Device Model Combination for PPCT would consist of a new firmware variant applied to an existing hardware variant? Please state your reasons for your view.

Q10.

Do you have any other comments on the proposed changes to the ETAD? Are you aware of any other issues, relating to the ETAD that should be addressed and / or considered? Please state your reasons why.

7 How to respond

Please provide responses by **17:00 on 21 September 2018** to DCC at consultations@smartdcc.co.uk. If you have any questions about the consultation documents, please contact Ofordi Nabokei at ofordi.nabokei@smartdcc.co.uk.

DCC shall be providing additional assistance in setting out what is contained within the regulatory version of the UTSAD for SMETS1 Services and the changes made to the CTSD and ETAD, for those who request it. A briefing session will be held on 11 September to complement the consultation.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state whether all, or any part, of your consultation response is confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department 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 1998 and the Environmental Information 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.

8 Attachments

- Attachment 1: User Testing Services Approach Document (UTSAD) for SMETS1 Services - Regulatory version
- Attachment 2: Common Test Scenarios Document (CTSD)
- Attachment 3: Enduring Test Approach Document (ETAD)