

Data Services Provider

Consultation on the SEC Variation Testing Approach Document for Future DSP

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Table of Contents

1. Background and context.....	3
1.1. The DSP Programme.....	3
1.2. Direction to produce the SVTAD.....	4
1.3. Scope and structure of this consultation	4
2. Scope, structure and content of the SVTAD.....	4
2.1. General requirements and SVTAD change mechanism	5
2.2. Lower-level testing documentation	6
2.3. Device Selection Methodology	6
2.4. Future DSP releases.....	6
2.5. Test completion	7
2.6. Mandated User Testing.....	7
2.7. Resolving Interoperability Issues	7
3. Designation of the SVTAD.....	7
4. Next steps	7
5. Consultation questions and how to respond	8
6. Attachments	8
Appendix A – Future DSP SVTAD draft direction text	9

1. Background and context

1.1. The DSP Programme

1. The DSP sits right at the heart of the smart metering infrastructure, providing data services that connect Energy Suppliers to devices at their consumers' premises. The DSP Data System is a central facility that controls the flow of messages to and from smart metering equipment, with Service User (SU) organisations (e.g. Energy Suppliers, Network Operators, and Other Users) communicating via these central DSP facilities.
2. The contract for the current DSP solution (referred to in this document as 'As-Is DSP') is set to expire in 2028 and encompasses several different capabilities including but not limited to:
 - a. Provision of gateway services (i.e. network connectivity) to connect SU and Service Providers (SPs) to the DSP in both production and test environments. This will be the first stage of the DSP Programme, however is not the subject of this SVTAD consultation. This service is currently provided by Gamma. VodafoneThree was selected as the new provider for gateway connections, and the replacement solution is called 'DCC Connect'.
 - b. The DCC User Interface Specification (DUIS) which sets out the structure of the messages that can be exchanged with the DSP. This is not subject to this SVTAD consultation as DCC intend to deliver this in a future DSP release beyond Release 2.
 - c. The Core DSP which provides message routing, anomaly detection, registration services, inventory management, DCC Key Infrastructure (DCCKI – which refers to the cryptographic certificates used within the Public Key Infrastructure (PKI) framework of the DCC), Certification Authority (CA), security checking, logging and reporting, and a Smart Metering Key Infrastructure (SMKI) repository. This is the delivery which is subject to the SVTAD and this consultation.
 - d. A DCC Service Management System (DSMS) which supports DCC's service operation. This is not subject to this consultation.
 - e. A Systems Integrator (SI), which manages key elements such as change and testing to ensure the system functions optimally. This is not subject to this consultation.
3. DCC recently completed a Full Business Case (FBC) for a new DSP contract to procure a solution for the capabilities within the existing contract. This excludes the DSMS capability which is in the process of being disaggregated with a replacement service being delivered under DCC's Future Service Management (FSM) Programme. FSM is a separate programme to DSP, and the delivery plan for FSM has been consulted on separately. There is no requirement for FSM to be delivered before DCC Connect.
4. New contracts were signed with partner organisations in April 2025. A disaggregated approach is being adopted with different partner organisations providing different capabilities. The DSP Programme will encompass the implementation of these new capabilities. This includes both the migration of SUs and SPs to the new solution as well as the migration of devices from the current DSP to the new DSP.
5. On 26 June 2025, DCC was directed to produce an updated delivery plan for the DSP Programme and published its consultation on this on 22 August 2025.¹ This consultation closed at 17:00 on 3 October 2025. DCC will now provide a report to the Department of Energy Security and Net Zero (DESNZ, referred to as 'the Department') containing its consideration of the responses and its conclusions on its proposed updated plan. DCC will publish this conclusions document on the DCC website.

¹ [DSP consultation on the revised delivery plan | Smart DCC](#)

1.2. Direction to produce the SVTAD

6. On 3 October 2025, in accordance with SEC Section X11.4, the Secretary of State directed DCC to develop a draft SEC Variation Testing Approach Document (SVTAD) for the variations to the SEC being considered to enable the introduction of the DSP Programme (the 'SVTAD for Future DSP').
7. The general requirements for the contents and development of an SVTAD are set out in SEC Section X11. These include testing objectives, the testing to be undertaken, and the environments to be used.
8. The Direction received from the Secretary of State requires that the Future DSP SVTAD should provide for the detailed test approach that will apply to enable DCC to introduce and transition to the Future DSP arrangements and for this to be set out in associated documents to be developed by DCC. The relevant variations are those that are required to give effect to the implementation of the draft delivery plan published for consultation by DCC on 22 August 2025, except those that are required for the implementation of DCC Connect Gateway Connections. The Direction also sets out that the SVTAD should provide for DCC to revise these documents in accordance with any request made by the Secretary of State and provide for where these documents need to be submitted to the Testing Advisory Group (TAG) for approval (with any disagreement being submitted to the Secretary of State for final determination).
9. In accordance with SEC Section X11.6, any SVTAD developed by DCC needs to be submitted to the Secretary of State following consultation with SEC Parties and the TAG. DCC has been directed to complete this by 31 January 2026.

1.3. Scope and structure of this consultation

10. We have prepared a draft SVTAD for the Future DSP Programme which we propose be incorporated into the SEC as a new SEC Appendix. This consultation seeks your views on this draft document ahead of its submission to the Secretary of State for approval and designation into the SEC. Section 2 of this consultation document provides further commentary on our drafting, and the draft SVTAD is available in Attachment 1.
11. This consultation also seeks your views on the proposed designation date for incorporating this SVTAD into the SEC, which would bring it into legal effect. Section 3 of this consultation document sets out the proposed date and rationale for this.
12. This consultation is expected to impact all SEC Parties.
13. This consultation will close at **17:00 on Friday 19 December 2025**. Following this, DCC will provide a report to the Department by 31 January 2026 containing its consideration of the responses and its conclusion on the SVTAD to be designated for the Future DSP Programme. We will publish this conclusions document on the DCC website.

2. Scope, structure and content of the SVTAD

14. The Future DSP SVTAD has been produced to support the PIT, including CIT and System Capacity Testing, SIT and User Testing of SEC changes related to the delivery of the Core DSP. The Future DSP SVTAD follows a similar format to other recent SVTADs developed for testing to support SEC change.
15. For the Future DSP Programme, as with previous programmes, the TAG will be required to approve the Testing Approach Document (TAD) for both the Pre-Integration Testing (PIT) and Systems Integration Testing (SIT) phases. Please see section 2.4 for further details.

2.1. General requirements and SVTAD change mechanism

16. Section 1 of the SVTAD sets out the definitions and interpretations that apply within the document.
17. Section 2 sets out the scope of the document, including:
 - the framework for the testing of the Future DSP arrangements;
 - the development and governance of the Future DSP Test Approach Documents
 - the development and governance of any Future DSP Mandated User Testing Document;
 - the development of governance of a Device Selection Methodology that governs the use of devices in PIT and SIT testing of the Future DSP;
 - arrangements for setting out the content of the Future DSP releases;
 - the timetable for testing;
 - the testing objective; and
 - the test entry criteria;
18. The framework for testing will follow DCC's standard testing approach, which has developed over time through learning from experiences from several testing cycles across different delivery programmes. DCC will continue to use a test lifecycle with three key phases:
 - Pre-Integration Testing (PIT) encompasses functional and non-functional system testing which will be developed in increment and Component Integration Testing (CIT)
 - System Integration Testing (SIT) tests the new code in an integrated environment as a whole system that includes other components within that environment with the purpose to ensure integration
 - User Integration Testing (UIT) allows DCC Users to undertake testing to verify the integration of the DCC Total System with their own systems and processes. Section 8 of the SVTAD outlines the approach for DCC to take should it consider that User Testing needs to be mandated as part of any of the Future DSP releases
19. The SVTAD has been drafted to accommodate alternative approaches that may arise, such as splitting the changes across multiple releases. This will enable DCC and the TAG to agree to any alternative approach quickly should the need arise (for example a delay to some parts of the testing). It also enables the documentation to be combined or split for different test phases and/or releases. Finally, it allows for DCC to develop Test Approach Documents for the PIT phase that relate solely to changes being delivered by a particular increment of the Future DSP if it is necessary and feasible to describe and complete this testing ahead of other testing being undertaken.
20. The SVTAD sets out that DCC shall not commence tests until the Test Approach Document setting out the approach to that testing has been approved by the TAG. This aligns with the approach to PIT for this programme that DCC has discussed with the TAG, and the usual approach to SIT.
21. The SVTAD also sets out that DCC shall not commence testing with devices in respect of the Future DSP solution until the Device Selection Methodology that requires use of those devices has been approved by the TAG.
22. Section 3 describes how the Future DSP SVTAD can be modified by DCC. The mechanisms for change are:
 - Following a Direction from the Secretary of State.

- Following consultation with Parties and the TAG and submission to the Secretary of State.
- Without consultation if changes are of a minor typographical nature or will not materially affect Parties' rights and obligations.

2.2. Lower-level testing documentation

23. Sections 4 and 5 of the Future DSP SVTAD cover the lower-level testing documentation that DCC is required to produce and which needs to be approved by the TAG:
 - Future DSP Testing Approach Document(s) (Section 4)
 - Future DSP Device Selection Methodology (Section 5)
24. As noted above, the SVTAD has been drafted to allow for multiple Future DSP Releases with separate lower-level testing documentation for each. The approach to defining the scope of each Release is set out in Section 6 of the SVTAD.
25. The Future DSP SVTAD requires a Future DSP TAD(s) to include the approach to testing for each Future DSP Release, which will cover (among other things):
 - the proposed amendments to the SEC that will be subjected to testing;
 - the principles and approach that will apply to PIT(s), including PIT increments and SIT(s);
 - the testing environments being used;
 - Whether devices are to be used in the CIT lifecycle of PIT and/or SIT, and if so the Device Model Combinations to be used consistent with the Device Selection Methodology (which must be included in the Test Approach Document before testing against those devices commences);
 - the depth and breadth and approach to test coverage;
 - the process for Testing Issue resolutions, exclusions and thresholds;
 - the exit criteria and Completion Report; and
 - the approach for providing test assurance.
26. DCC is currently developing the Future DSP TAD(s) and supporting documentation in collaboration with the TAG. This is taking place in parallel with this consultation to enable these to be approved following the designation of the SVTAD into the SEC.

2.3. Device Selection Methodology

27. Section 5 of the Future DSP SVTAD covers the 'Device Selection Methodology' that DCC is required to produce in relation to Future DSP releases. DCC shall consult on the proposed methodology with SEC parties and other relevant stakeholders prior to seeking approval at TAG.

2.4. Future DSP releases

28. Section 6 of the Future DSP SVTAD cover the 'Future DSP Release Document' that DCC is required to produce in relation to Future DSP releases.
29. This document will set out the content of each Future DSP Release, include the scope of each Future DSP Release, any SEC variations that are planned to be implemented at the time of each release, and the planned date for implementation of each release.
30. DCC will provide the Future DSP Release Document to the TAG for information ahead of any Future DSP Release Test Approach Document for approval. Should the Future DSP Release Document need to be amended, that amended version shall be provided to the TAG for

information ahead of any new or updated Test Approach Documents that are impacted by that amendment.

2.5. Test completion

31. Section 7 of the Future DSP SVTAD sets out the arrangements for test completion for the Future DSP Programme.
32. Test completion for a Future DSP Release PIT (or Increments of PIT) and for SIT will occur once the SEC Panel, with support from the TAG, has determined that the exit criteria set out in the Future DSP TAD(s) have been met. DCC will support this completion process through the provision of a Test Completion Report to the Panel. Where the Panel supports the report, the test phase will be considered complete. Where it does not it will be necessary for DCC to update the report and continue testing or refer any disagreement to the Secretary of State for resolution.

2.6. Mandated User Testing

33. DCC has considered whether it will propose User testing for Future DSP should be mandated and sought views from industry as part of the LC13B consultation. Although DCC has not made a final decision on whether to propose this, the SVTAD outlines the process to be followed if DCC does propose User Testing should be mandated.

2.7. Resolving Interoperability Issues

34. Finally, DCC has proposed a process for resolving any interoperability testing issues coming out of SIT or UIT that arise between the DCC Total System and User Systems/Enrolled Smart Metering Systems any time prior to the Future DSP Device Migration Complete milestone set out in the Joint Industry Plan (JIP). This can be found in Clause 9 of the SVTAD. Where DCC considers that its solution is compliant with the baseline version of the SEC specified in the Testing Baseline Requirements Document (TBRD), the DCC shall provide to the Secretary of State a description of what the testing issue is and the results of its investigation. This will include a view of how the issue should be rectified (i.e. whether the DCC system, or the external interfacing system, ought to change). The Secretary of State will then determine how the Testing Issue should be rectified and notify its decision to the DCC and other stakeholders. This is similar to the approach that was taken for resolving interoperability issues that arose during testing of the new 4G communications solution.

3. Designation of the SVTAD

35. DCC has discussed the designation of this SVTAD with the Department. We are proposing that, subject to the timely receipt of DCC's conclusions report on this consultation, the Department will designate the SVTAD on 13 February 2026, or as soon as reasonably practicable within one month thereafter as a contingency measure if required. A draft direction for the designation of the SVTAD can be found in Appendix A of this consultation document.

4. Next steps

36. Following the closure of this consultation, DCC will assess respondents' views, and amend the draft SVTAD as required. DCC will then submit an amended version of this document to the Department that it considers suitable for designation into the SEC by the Secretary of State.

37. DCC is aiming to provide a report to the Department by no later than 31 January 2026. This report will contain DCC's consideration of the responses to this consultation as well as the proposed updated version of the SVTAD and the proposed date for the designation of this into the SEC. DCC will publish its conclusions document on its website.

5. Consultation questions and how to respond

38. We are seeking your views on the following questions:

Q1

Do you agree with the proposed SVTAD for the Future DSP Programme?

Please indicate any areas of disagreement and your rationale for this

Q2

Do you agree with the proposed designation date for the SVTAD of 13 February 2026 or within one month thereafter?

Please provide your rationale for your response

39. Please provide responses using the attached response form by **17:00 on Friday 19 December 2025** to DCC at consultations@smartdcc.co.uk.
40. Consultation responses may be published on our website (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 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 confidential) may be made available to the Department and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department 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 Information Regulations 2004). If the Department 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.
41. If you have any questions about this consultation, please contact us at consultations@smartdcc.co.uk.

6. Attachments

42. This consultation includes two attachments:
- Attachment 1: Proposed Future DSP SVTAD
 - Attachment 2: Consultation response template

Appendix A – Future DSP SVTAD draft direction text

This appendix contains the text that the Department plans to use for the designation of the Future DSP SVTAD.

This direction is made for the purposes of the smart meter communications 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 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that the document set out at Annex [XX] to this direction is hereby designated as the SEC Variation Testing Approach Document for Changes required to support the Future DSP, and shall be incorporated into the SEC as Appendix [XX] with effect from 13 February 2026.

This direction is also being notified to the SEC Administrator.