



Consultation

November 2020 SEC Variation Testing Approach

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Table of Contents

1. Introduction	2
2. General Requirements of the SVTAD November 2020	2
2.1. Framework and Arrangements for Developing the Test Approach Document	3
2.2. Mandated User Testing	3
2.3. Test Completion	4
3. Next Steps and Approval	5
4. Questions for Respondents.....	5
5. How to Respond	5
6. Attachment 1 - Draft SVTAD Direction Text.....	7

1. Introduction

The November 2020 SEC Release is expected to include both Smart Energy Code (SEC) Modifications and the Department of Business, Energy and Industrial Strategy (BEIS) directed changes.

Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the SEC, the Secretary of State has directed the DCC to develop a draft SEC Variation Testing Approach Document in respect of those variations to the SEC proposed to be made for the purposes of the "BEIS Q4 2020" package (November 2020 SVTAD), which are currently planned to be given legal effect on a planned go-live date of 29 November 2020.

The SEC Variation Testing Approach Document is a high-level framework for the testing for the BEIS directed changes included and will require the production of a document, a Testing Approach Document, to contain the detailed testing approach. The November 2020 SVTAD recognises that the Testing Approach Document's scope may also include tests that are required to support SEC Modifications that are planned to be introduced into the SEC at the same time as the BEIS Q4 2020 Release changes are to be made.

A SEC Release Testing Approach Document (TAD) defines the approach to testing changes to DCC Systems which arise as a result of a SEC Release. It has been agreed by the Panel and BEIS that the TAD for November 2020 SEC Release (November 2020 DCC Testing Approach Document) could include details of the actual tests required for both types 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 November 2020 SVTAD that 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. A separate consultation is being published in parallel with this consultation on the draft November 2020 DCC Testing Approach Document.

The closing date for this consultation is Wednesday, 10 June 2020.

2. General Requirements of the SVTAD November 2020

The November 2020 SVTAD sets out:

- the framework for the testing that is required to be undertaken for BEIS Q4 2020 SEC Variations as part of the November 2020 SEC Release;
- the arrangements that apply to the development of the November 2020 DCC Testing Approach Document; and
- the rules to apply to the development of any November 2020 Mandated User Testing Document.

2.1. Framework and Arrangements for Developing the Test Approach Document

The draft November 2020 SVTAD requires the DCC to produce a Test Approach Document for the BEIS changes, which can form part of wider Test Approach Document covering the November 2020 SEC Release (November 2020 DCC Testing Approach Document). The reason for this approach is so that a single Test Approach Document can be produced for the November 2020 SEC Release that supports both SEC Modifications and BEIS changes, recognising that the Test Approach Document will be subject to two different governance regimes (the governance prescribed by the SVTAD in respect of the BEIS changes, and the governance prescribed by Section D of the SEC in respect of the Modifications). In developing this proposed framework for the BEIS changes, we have built on governance models that applied to previous BEIS-driven SEC releases, the most recent being SMETS1 Releases.

In respect of the BEIS changes, the DCC will submit the draft November 2020 DCC Testing Approach Document to the TAG for review. Provided that the TAG and the DCC can reach an agreement, the relevant draft November 2020 DCC Testing Approach Document will be updated by the DCC as necessary and deemed to be final. However, if the TAG and the DCC cannot reach an agreement on the approach to testing for the BEIS Q4 2020 changes, the matters of disagreement will be referred by the DCC to the Secretary of State for determination. The Secretary of State's decision on such matters will be final and binding. The relevant draft November 2020 DCC Testing Approach Document will be updated by the DCC to reflect the determination and will be deemed to be final.

A consultation¹ on the draft November 2020 DCC Testing Approach Document is being issued in parallel with this consultation. Once the November 2020 DCC Testing Approach Document has been finalised, the DCC will take all reasonable steps to complete the tests set out in each November 2020 DCC Testing Approach Document in accordance with the milestone plan published by the DCC for the relevant November 2020 SEC Release. The document will also be annexed to the November 2020 SEC Release Implementation Document (RID)² and be part of the RID. The governance of the SEC Modification elements is set out in the RID.

2.2. Mandated User Testing

"Mandated" User testing, that is User testing that must be completed prior to a Release being deployed to Production and going live, is currently not expected for the November 2020 SEC Release.

If the DCC considers that User testing is required prior to the implementation of the BEIS Q4 2020 changes going live, we will set out our proposals for such Mandated User testing in a draft November 2020 Mandated User Testing Document, including those Users that should be

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/open-consultations/>

² <https://smartenergycodecompany.co.uk/november-2020-sec-release/>

required to participate in the testing, the approach to testing, the arrangements for test completion and notification of test completion.

In developing a November 2020 Mandated User Testing Document, the DCC will 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 this release. However, the rules are included in the November 2020 SVTAD for flexibility, should views subsequently change.

2.3. Test Completion

It is proposed that the Panel will decide on DCC test completion in respect of the BEIS Q4 2020 changes.

Completion of the testing for the BEIS Q4 2020 changes set out in the November 2020 DCC Testing Approach Document will only be complete when the Panel determines that the Exit Criteria set out in that document for that testing have been met.

The proposed process the DCC will follow is outlined below:

- A Completion Report will be prepared by 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, they will confirm the completion of testing for the BEIS Q4 2020 changes. The Completion Report will be updated by the DCC as necessary and deemed to be final.
 - If the Panel highlights any issues or requires changes to the Completion Report in respect of the BEIS Q4 2020 changes and the DCC agrees, the DCC will update the Completion Report to reflect resolution of any issues.
 - If the Panel believes the Exit Criteria have not been met in respect of the BEIS Q4 2020 changes, and the DCC and the Panel disagree on this, the matter may be referred to the Secretary of State for determination. Alternatively, the DCC may continue with testing (and Clause 3.10 onwards will apply again).
- Referral to the Secretary of State for determination:
 - If the Secretary of State agrees that testing for the BEIS Q4 2020 changes is complete, then the relevant Completion Report will be updated by the DCC as necessary and the contents relating to the BEIS Q4 2020 changes will be deemed to be final.
 - If the Secretary of State disagrees that testing for the BEIS Q4 2020 changes is complete, then the DCC will continue with testing (and Clause 3.10 onwards will apply again).

- 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.

3. Next Steps and Approval

Following the closure of this consultation, DCC will consider respondents' views, and, subject to the consultation responses received, submit to BEIS the SVTAD for the November 2020 SEC Release that it considers suitable for designation into the SEC.

DCC will conclude on this consultation, providing a report to BEIS no later than 21 June 2020.

DCC has discussed the designation of the SVTAD for November 2020 SEC Release with BEIS and it is proposed that, subject to timely receipt of DCC's conclusions report on this consultation, copies of relevant stakeholder responses to this consultation and proposed final version of the SVTAD, BEIS will designate the SVTAD on 30 June 2020 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.

4. Questions for Respondents

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

Q1	Do you agree with the proposed SVTAD for the November 2020 Release? Please indicate any areas of disagreement and the reasons for them.
Q2	Do you agree with the proposed designation date of 30 June 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the November 2020 SVTAD?

5. How to Respond

Please provide responses by **16:00 on 10 June 2020** 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 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 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 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.

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

6. Attachment 1 - Draft SVTAD Direction Text

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 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MMM YYYY], the document set out in Annex [XX] in this direction is hereby designated for incorporation as the SEC Variation Test Approach Document for the November 2020 SEC Release and shall be incorporated into the SEC as Appendix XX in the form set out in Annex [XX] (respectively) to this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5.6 of the SEC, the definition of "SEC Variation Testing Approach Documents" in Section A1 (Definitions) of the SEC is hereby amended by adding a comma after the words 'Appendix AJ', deleting the word 'and' prior to the words "Appendix AK" and adding the words "and Appendix [XX]" after the words "Appendix AK".

This direction is also being notified to the SEC Administrator.