Data Communications Company



DCC Diagnostic Function

Consultation on the SEC Variation Testing Approach Document

Issued: 10 November 2026
Respond by: 17:00 on 9 December 2026
Contact: consultations@smartdcc.co.uk
Classification: DCC Public

Table of Contents

1. Background and context 3
   1.1. The DCC Diagnostic Function 3
   1.2. Direction to produce the SVTAD 3
   1.3. Scope and structure of this consultation 4
2. Structure and content of the DDF SVTAD 4
   2.1. General requirements and SVTAD change mechanism 4
   2.2. Lower-level testing documentation 5
   2.3. Test completion 5
3. Designation of the DDF SVTAD 6
4. Next steps 6
5. Consultation questions and how to respond 6
6. Attachments 7
Appendix A – Future DDF SVTAD draft direction text 8

1. Background and context

1. Following a Direction from the Secretary of State, DCC has prepared a draft Smart Energy Code (SEC) Variation Testing Approach Document (SVTAD) for the DCC Diagnostic Function (DDF) Programme, which is available in Attachment 1 to this document. We are seeking your views on this document ahead of its submission to the Secretary of State for approval and designation into the SEC. This consultation will close at **17:00 on 9 December 2026.**

1.1. The DCC Diagnostic Function

2. The Smart Energy Code Company (SECCo), Energy Suppliers, DCC and other Parties are coordinating efforts to recover smart meters that are not operating in smart mode, ensuring that consumers can benefit from a fully operating smart meter. To support these efforts, DCC is seeking to operate a Diagnostic Function to assist resolution of both SEC Incidents and smart metering devices that do not always operate in smart mode.

3. The Department for Energy Security and Net Zero (DESNZ) (the Department) is currently consulting[1] on proposals to establish the supporting regulatory framework that would enable DCC to operate a Diagnostic Function. This consultation on the DDF SVTAD is intended to run in parallel with the DESNZ consultation

4. Introduction of these proposals would enable DCC to provide more effective information to SEC Parties and DCC Service Providers, supporting the identification of the reasons why smart devices may not be communicating. This would help improve outcomes for households and small businesses that are currently unable to realise the full benefits of smart metering.

1.2. Direction to produce the SVTAD

5. On 9 November 2026, in accordance with SEC Section X11.4, the Secretary of State directed DCC to develop a draft SVTAD for the variations to the SEC being considered to enable the introduction of the DDF (the 'DDF SVTAD').

6. 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.

7. The Direction received from the Secretary of State requires that the DDF SVTAD should provide for the detailed test approach to support the introduction of the diagnostic function and for this to be set out in associated document(s) to be developed by DCC.

8. The Direction also sets out that the SVTAD should:

   - Set out testing objectives, test stages, environments, entry and exit criteria, Testing Issue Thresholds, assurance arrangements and evidence required to support test completion;
   - provide for systems integration testing;
   - provide for the DCC to revise the associated testing documents in accordance with any request made by the Secretary of State; and
   - provide for the associated testing documents, and any material revision to them, to be submitted to the Testing Advisory Group (TAG) for review and approval before the relevant testing commences, and for any disagreement between the TAG and DCC concerning their content, to be submitted to the Secretary of State for final and binding determination.

[1] https://smartenergycodecompany.co.uk/desnz-consultation-on-licence-and-sec-changes-for-dcc-diagnostic-function/

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 28 January 2027.

1.3. Scope and structure of this consultation

10. We have prepared a draft DDF SVTAD 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 be of interest to all SEC Parties.

13. This consultation will close at **17:00 on 9 December 2026**. Following this, DCC will provide a report to the Department by 28 January 2027 containing its consideration of the responses, its conclusions, and a recommendation that the SVTAD be designated for the DDF Programme. We will publish this conclusions document on the DCC website at the same time.

2. Structure and content of the DDF SVTAD

14. The DDF SVTAD follows a similar format to other recent SVTADs developed for testing to support SEC change.

2.1. General requirements and SVTAD change mechanism

15. Section 1 of the DDF SVTAD sets out the definitions and interpretations that apply within the document.

16. Section 2 sets out the scope of the document, including:

- the framework for the testing of the DDF arrangements;
- the timetable for testing;
- the testing objective;
- the test entry criteria; and
- the arrangements that will apply for developing the lower-level documentation that sit below the SVTAD. This will be a Test Assurance Document (TAD), which sets out the testing approach (see section 2.2 of this document for more details on this).

17. DCC will undertake Pre-Integration Testing (PIT) that will be subject to internal DCC governance, with the output shared with the TAG for information. This will not, therefore, be in scope of the SVTAD.

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 use a test lifecycle with a single System Integration Testing (SIT) phase:

- System Integration Testing 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.

19. Due to the relative simplicity of the technical solution and development, testing shall be carried out by the DCC Technology Office. Assurance will be carried out by DCC Test Assurance.

20. Section 3 describes how the DDF SVTAD can be modified by the 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

21. Section 4 of the DDF SVTAD covers the lower-level testing documentation that DCC is required to produce, this being a DDF TAD.

22. The DDF SVTAD requires a DDF TAD to include the approach to testing, which will cover (among other things):

- the proposed SEC changes that that will be the subject of this testing;
- the scope of the DDF;
- the principles and approach that will apply to SIT;
- the testing environments being used;
- the requirements (if any) for security testing
- the process for Testing Issue resolutions, exclusions and thresholds;
- the exit criteria and Completion Report; and;
- the approach for providing test assurance.

23. The DDF SVTAD sets out how the DDF TAD will be approved and, where necessary, revised. It also provides a route of escalation to the Secretary of State where agreement cannot be reached between DCC and the TAG on the TAD content. DCC maintains a rolling forward plan of document and information sharing with the TAG. We expect that the draft TAD will be shared with the TAG through this process.

24. DCC will be developing the DDF TAD and supporting documentation. This will take place alongside this consultation to enable these to be approved following the DDF SVTAD's designation into the SEC.

2.3. Test completion

25. Section 5 of the DDF SVTAD sets out the arrangements for test completion for the DDF SIT.

26. Test completion for SIT will occur once the SEC Panel, with support from the TAG, has determined that the exit criteria set out in the DDF TAD has 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, DCC will need to either update the report and continue testing or refer any disagreement to the Secretary of State for resolution.

3. Designation of the DDF SVTAD

27. DCC has discussed the designation of the DDF 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 this into the SEC on 12 February 2027, or as soon as reasonably practicable within one month thereafter as a contingency measure if required. A draft direction for the designation of the DDF SVTAD can be found in Appendix A of this consultation document.

4. Next steps

28. Following the closure of this consultation, DCC will assess respondents' views and will discuss these with the Department. It will then prepare an amended version of the SVTAD that it considers suitable for designation into the SEC by the Secretary of State, accounting for the responses received. Alongside this, DCC will prepare a report containing its consideration of the responses to this consultation and the proposed date for the designation of the DDF SVTAD into the SEC. DCC will submit these to the Department no later than 28 January 2027 and will publish these on its website at the same time.

5. Consultation questions and how to respond

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

Q1	Do you agree with the proposed SVTAD for the DCC Diagnostic Function? *Please indicate any areas of disagreement and your rationale for this*
Q2	Do you agree with the proposed designation date for the DCC Diagnostic Function SVTAD of 12 February 2027 or as soon as reasonably practicable within one month thereafter? *Please provide your rationale for your response*

30. Please provide responses using the attached response form by **17:00 on 9 December 2026** to DCC at consultations@smartdcc.co.uk.

31. 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.

32. If you have any questions about this consultation, please contact us at consultations@smartdcc.co.uk.

6. Attachments

33. This consultation includes two attachments:

- Attachment 1: Proposed DDF SVTAD
- Attachment 2: Consultation response template

Appendix A – Future DDF SVTAD draft direction text

This appendix contains the text that the Department plans to use for the designation of the DDF 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 11 and Schedule 2 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 the DCC Diagnostics Function, and shall be incorporated into the SEC as Appendix [XX] with effect from 12 February 2027. This direction is also being notified to the SEC Administrator.