

# Future Service Management

DCC conclusions on the  
transitional and enduring  
regulatory changes

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# 1. Introduction and context

1. The purpose of this document is to conclude on the Data Communications Company's (DCC's) recent consultation on the proposed transitional and enduring regulatory changes to the Smart Energy Code (SEC) to support the delivery of the replacement tool for the current DCC Service Management System (DSMS).<sup>1</sup>
2. DCC needs to identify and set out any regulatory changes which correspond with any changes to the current arrangements required to deliver the new FSM platform. The Joint Industry Plan (JIP) for the Future Service Management (FSM) Programme includes a key milestone which requires DCC to have concluded on the detailed regulatory changes required no later than 2 May 2025. This document forms our conclusions required by this JIP Milestone.

## 1.1. The FSM Programme

3. The DSMS is a critical part of DCC's infrastructure, used to track and resolve issues across the smart metering network. Customers use DSMS to request DCC services, raise incidents, and access reporting and diagnostics information. This system handles a high volume of activity, with around 25,000 separate requests or incidents raised through it each month. The current DSMS service is supported under the existing Data Service Provider (DSP) contract.<sup>2</sup> However, the tool on which the DSMS is currently built is now coming to the end of its life and so a new tool is required to mitigate service and security risks to the smart meter network.
4. The FSM Programme was initiated in June 2023 to competitively procure and implement a replacement tool ahead of the new DSP service commencing in 2028. The scope of this programme is to:
  - Replace the existing scope of DSMS, including the Self-Service Interface (SSI) and the Self-Service Management Interface (SSMI);
  - Replace the underlying Service Management tool which is used by the DCC Service Desk; and
  - Incorporate Order Management System (OMS) including the ordering of 4G Communications Hubs (CHs) and the returns of all Smart Metering Equipment Technical Specifications 2+ (SMETS2+) CHs.
5. The current DSMS service is built upon a BMC Remedy platform, which is an IT Service Management tool. The support contract for Remedy is due to expire in October 2025 and DCC is working to procure a new platform as a replacement for the existing DSMS. Following it being recommended by all bidders during our procurement exercise, DCC has selected ServiceNow as the platform to be used for FSM. ServiceNow is a flexible cloud-based 'software as a service' tool offering several Service Management aspects either 'out-of-the-box' or via configuration or customisation.
6. DCC has concluded to include the OMS functionality for 4G CHs within scope of the FSM Programme, leveraging the same ServiceNow solution as for Service Management. The 4G OMS will therefore be delivered through the replacement tool at the same time, replacing the existing solution. Any future technologies would also be incorporated into the ServiceNow solution in the same way. DCC has also concluded to include the functionality to return all SMETS2+ CHs within the scope of the programme. Please note that the existing OMS solutions for ordering 2G/3G and long-range radio (LRR) CHs will not be replaced within this programme. Each will instead be

<sup>1</sup> [FSM consultation on the transitional and enduring regulatory changes | Smart DCC](#)

<sup>2</sup> The DSP and other services delivered under the data services contract sit right at the heart of the smart metering infrastructure by providing data services that connect DCC Users (such as Energy Suppliers, Network Operators and Other Users) to Devices at their consumers' premises.

retired independently in the future as they reach their final dates for ordering the respective products.

7. In addition to replacing the tool, DCC is intending to retire the use of User Interface (UI) DCC Key Infrastructure (DCCKI) personnel certificates to access the DSMS and replace them with multi-factor authentication (MFA). MFA is a widely used and trusted approach to authenticating the person logging in to a site by requiring them to provide two or more pieces of evidence (for example entering a password, using a security token or authenticator device, or using biometrics).

## 1.2. Previous industry engagement

8. DCC has engaged extensively with the industry (including DCC Users) during the competitive procurement via a series of workshops and with Smart Energy Code (SEC) Panel and Sub-Committees between March and June 2024. It used this engagement to understand DSMS users' business needs and the features and functionality that they would like to see in the new solution. Users considered the high-level problem statements and scope and were supportive of the overall approach, provided that the core functionality of the DSMS was protected. Additionally, customers were supportive of updating the SEC where necessary to keep the solution as close to the out-of-the-box tool as possible to drive optimal cost benefits
9. DCC shared the business requirements with the Operations Group (OPSG) and the Technical Architecture & Business Architecture Sub-Committee (TABASC), both of which were initially comfortable that the business needs identified would be achieved. DCC also set up a working group consisting of a small group of DSMS users from Supplier Parties and Network Parties (known as the Service Management Working Group (SMWG)). The SMWG supported DCC in understanding how the current tool works from customers perspective and how they would use the new solution by prioritising any customisations of the tool according to users' needs. DCC also held a working group for the security-based configurations and customisations and highlighted the need for potential changes to the SEC.
10. DCC's assessment and the outputs of the SMWG and the security working group were presented back to the SEC Panel and its Sub-Committees in June and July 2024. Overall, the industry was supportive of the outcomes from this work. This engagement has informed the solution that DCC is taking forward.
11. However, to provide benefits to DCC and users by modernising Service Management and access to a Service Management System, DCC identified a number of SEC changes that would be needed. It is proposing to introduce the following changes to the SEC:
  - **Changes to User access and identity management:** DCC is intending to retire the use of UI DCCKI personnel certificates and replace them with MFA. UI DCCKI certificates are only used for accessing SSI and SSMI and have no other use or purpose under the SEC. Additionally, these are separate to Enterprise Information Integration (EII) and Internal Infrastructure Issuing (III) DCCKI certificates, which are not affected by the FSM solution.
  - **Enable improved process for ADT and other file submissions:** DCC is developing a simplified process to allow a user to attach an Anomaly Detection Threshold (ADT) file directly within a service request and utilise a workflow to process it. This would remove the current manual process using SharePoint. This process also relates to Quarantine Command Action files and could also be extended to other file upload requests.
  - **Aligning OMS functionality with SSI:** DCC is also intending to incorporate OMS functionality within the scope of FSM. Specifically, this will cover the ordering of 4G CHs (and any later products) and the returns of all SMETS2+ CHs (both existing 'legacy' CHs and 4G CHs). Consequently, the access rules for OMS user security will need aligning with those for SSI. Please note that the existing OMS platforms for existing 2/3G and LRR CHs will be left as-is and will continue to operate until such time that those types of CHs are no longer able to be

ordered. Consequently, there are also some small wording changes within the SEC documentation to better accommodate the new processes as well as the legacy processes.

### 1.3. Consultation responses and next steps

12. This consultation, which ran from 23 January 2025 to 6 March 2025, sought views on:
  - The proposed changes to the SEC (both main body and subsidiary documents) to deliver the enduring arrangements;
  - The proposed changes to SEC Appendix AU 'Network Evolution Migration & Transition Approach Document' (NETMAD) covering the transitional arrangements during the delivery of the FSM Programme; and
  - The proposed designation date for incorporating these changes into the SEC.
13. A summary of the comments received and DCC's responses to these are set out in Section 2 of this document. Based on stakeholder feedback, we have made one change to the NETMAD, which is set out in Section 3 of this document.
14. DCC will submit its conclusions to the Secretary of State on 25 April 2025. Subject to the Department for Energy Security & Net Zero's (DESNZ) (the Department) approval, the changes to the NETMAD are due to be incorporated into the SEC on 1 May 2025 (or within one month thereafter). The proposed date for the incorporation of the enduring changes will need to be reconsulted upon, due to changes in the FSM Programme's timeline since this consultation was issued.
15. The changes to the SEC Subsidiary Documents will be delivered following Direction from the Department using powers under Condition 22 of the Smart Meter Communication Licence and SEC Section X 'Transition'. No material changes are required to the main body of the SEC (the SEC Sections) to deliver this solution. However, DCC has identified some consequential changes to the main body of the SEC that would be beneficial to make in response to the SSD changes. As the main body changes are consequential changes only, the Department considers the changes to the main body of the SEC can be delivered under the provisions of Licence Condition 22.30 and SEC Section X5.6, rather than needing to be enacted by the Secretary of State using the powers conferred under Section 88 of the Energy Act 2008.

## 2. Analysis of responses

16. DCC received four written responses to this consultation: three from Large Suppliers and one from a Network Party.
17. DCC has analysed the feedback provided. This section sets out an overview of the responses received to this consultation and DCC's response.

### 2.1. Question 1

18. DCC sought views on the proposed drafting to reflect the changes to User access and identity management.

**Q1**

Do you agree with DCC's proposed amendments to the SEC documents to reflect the changes to User access and identity management being delivered under the FSM solution?

### Respondent views

19. All four respondents agreed with the proposed changes relating to User access and identity management.

### DCC response

20. DCC notes the support and has not made any changes to the relevant drafting.

## 2.2. Question 2

21. DCC sought views on the proposed drafting to enable the improved process for ADT and other file submissions.

Q2

Do you agree with DCC's proposed amendments to the SEC documents to enable the improved process for ADT and other file submissions?

### Respondent views

22. All four respondents agreed with the proposed changes to enable the improved process for ADT and other file submissions.
23. One respondent welcomed any streamlining whilst still maintaining functionality. Another respondent noted removing the interaction with SharePoint would remove the risk of files being uploaded to the wrong location, which risked updates being missed. A further respondent would like to see more workflow steps removed to allow Electricity Network Parties to directly control ADTs in real time, allowing them to quickly adapt to changes in usage (e.g. in storm conditions) at a faster pace.
24. One respondent, while supportive of the changes, raised some clarification queries:
  - The respondent noted limited information is shared by DCC in relation to notification of warning and quarantine breaches to enable User investigation, meaning the User must request the required information. They queried if the intention is for this information to be available on the first communication of a breach in the FSM solution?
  - The respondent noted warning breaches are not currently communicated by an SSI ticket, and that emails are sent in relation to quarantine breaches only and not warnings. They asked if the intention is for a standard notification process for both warning and quarantine breaches to be implemented.
  - The respondent asked if the bulk release of quarantine messages will be available. This is not currently available, thus requiring small batch sizes to enable release.
  - The respondent commented that confirmation of ADTs being applied by DCC is not always shown in the SSI or sent in email confirmation. They asked how the FSM solution will confirm that the ADT has been applied, and what prompt will be issued to inform the User that confirmation of the ADT being applied by the DCC has been sent.
  - The respondent sought clarity on whether the SharePoint for uploading ADT files will be automatically removed or if User action would be required. They also asked if the SMKI folder for uploading and receiving any other SMKI related instructions would remain or if there would be a different method required to issue instructions to DCC.

## DCC response

25. DCC acknowledges the request to see more workflow steps removed. This would be a situation where the fast-track ADT process would be relevant and DCC has an existing commitment to processing within 24 hours of receiving a fast-track request. As part of the FSM Programme, DCC is removing one authorisation step from the Service Request processing in order to speed up the processing of the request. DCC currently reviews all ADT files to ensure that they are correctly formatted and will not cause further issues. If there is a desire for an improvement to the fast-track ADT process or timeframes, this would need to be considered outside of this programme.
26. DCC has reviewed the comments raised in paragraph 24 above, and our responses to each point are set out below.
- DCC is not currently planning to change the existing process around how information is shared in relation to notifications of breaches, or around whether notifications will be generated for warnings as well as breaches, and this was not raised by customers when requirements were gathered for the FSM solution. However, if customers provided feedback in the future (e.g. via relevant Sub-Committees) that this should change then DCC would investigate and progress those changes separately. DCC is currently developing the in-life change processes that will be used for the FSM solution after go-live and will share this with the industry later in the year once this has been prepared.
  - DCC notes the question of whether a bulk quarantine release function will be available is not currently part of the FSM solution. However, as above, if there was a request from customers for this in the future, then this would be investigated and progressed separately and added to the product backlog.
  - DCC confirms that confirmation will be sent to the requestor that an ADT update has been applied upon completion of the Service Request. This will happen through an update to the Service Request and an email notification.
  - No User action will be required regarding the SharePoint folders. These folders will remain in place as a back-up method, for example in case the SSI undergoes an outage. DCC can confirm that the option to upload SMKI nomination forms from SharePoint rather than directly through a Service Request will remain available.
27. We are not proposing any changes to the regulatory drafting in response to these comments.

## 2.3. Question 3

28. DCC sought views on the proposed drafting to align the OMS functionality with SSI.

**Q3**

Do you agree with DCC's proposed amendments to the SEC documents to align the OMS functionality with SSI?

## Respondent views

29. All four respondents agreed with the proposed changes to align the OMS functionality with SSI.
30. One respondent was supportive of not transferring 2G/3G CH to the new platform, so long as the current OMS is supported for as long as there are 2G/3G CHs available to order.
31. One respondent was supportive so long as training is provided and appropriate user roles set up to enable access to this portion of the SSI.



32. One respondent welcomed the improvement to the process for ordering 4G CHs. They sought confirmation that the FSM solution would deliver all the current OMS functionality. They also queried if changes to items such as a user's role or location would be managed within the SSI.

#### DCC response

33. DCC notes the support and has not made any changes to the relevant drafting.
34. DCC confirms that training will be made available for the OMS module and has clarified this within the NETMAD as an area of training that will be provided.
35. DCC confirms that the FSM solution will deliver all of the current OMS functionality, and that changes to the items stated will be managed within the SSI.

## 2.4. Question 4

36. DCC sought views on the proposed changes to the NETMAD.

**Q4**

Do you agree with DCC's proposed amendments to the NETMAD for the transitional activities?

#### Respondent views

37. Two respondents agreed with the proposed changes to the NETMAD. The other two respondents did not disagree but sought clarity on some elements of the drafting.
38. One respondent sought clarity on what is meant by 'SSI User Accounts' and whether this is what is seen and managed by the User or those in DCC's back-end system. They also queried what is meant by user identity data from the existing DCC Identity Provider Services (Entrust IDP).
39. One respondent noted the reference to transferring all user accounts regardless of whether the user is considered active or not and queried if these were the SSI user accounts or something else. They noted that administration users will need to 'activate' their SSI users, and queried what information will be shared by DCC to show the current roles each user has. Another respondent queried what 'early access' would be available to administration users and when this would begin, noting this activity could require significant resource from the organisation.
40. One respondent noted the training sessions in the weeks prior to start of User Integration Testing (UIT), and queried the targeted start date of UIT, and therefore the dates of the targeted training sessions. They also noted the subsequent weeks until the cut-over to the FSM during which incremental snapshots of user account data in live environment would be shared for checking and queried the planned timeline for this. Another respondent queried how training sessions would be communicated to users, and recommended publishing a calendar of training to support users in requesting a session to join.
41. One respondent queried who would be involved in testing the FSM solution, noting the User Entry Process Testing (UEPT) requirements and the new User testing required before a User is eligible to access ServiceNow platform, and what the timeline would be for this work.
42. One respondent sought specific training for different user types (e.g. to Suppliers or to Network Parties), recognising there will be common core elements to any such training.

#### DCC response

43. DCC can confirm that the user identity data in the existing DCC Identity Service Provider is the same information that relates to 'SSI User Accounts'. This is also the same information that is referred to under the transfer of all user account data.



44. Whilst the NETMAD details key activities and milestones for the migration of user accounts, DCC has not yet determined the detailed migration and cutover approach and will be engaging the industry on this once DCC has established its proposed position. We will ensure the queries flagged by respondents in paragraphs 39 and 40 above are included in this work.
45. DCC will shortly be issuing a consultation on the updated delivery and engagement plan for the FSM Programme (see question 13) and will set out the planned UIT entry dates and associated industry engagement activities as part of this. UIT training is planned to consist of a one-hour session two weeks prior to UIT entry, tailored to the UIT requirements. This will be notified to Users six weeks in advance. The training is currently expected to be generic, with a walkthrough of customer journeys, but DCC notes the request for specific training for specific User types and will take this into consideration. The portal interface is also being designed to be intuitive, and tours will be available for users on a self-learning approach. DCC will also host a drop-in session following the training.
46. DCC will be reaching out to all service users to identify representatives that will be responsible for cascading the training to all end users at their organisation, and invites will be sent to the nominated representative. While the training is not mandatory, DCC is expecting a representative from all service users to attend. A training schedule is being developed and DCC will make this available once this has been prepared.

## 2.5. Question 5

47. DCC sought views on its proposal to relocate some of the detail currently contained in the SEC appendices to supporting code required documents.

**Q5**

Do you agree with DCC's proposed approach to relocating detail currently contained in SEC Appendices to the supporting 'SSI Functions and Roles Policy' and 'DCC Internet Access Policy' Code Required Documents, which would be subject to a lighter governance approach to approving updates?

### Respondent views

48. Two respondents expressed their support for this approach, welcoming the lighter governance approach. The other two respondents gave no view either way.
49. One respondent noted that the content of the new documents would need to be reviewed as part of a further consultation. They queried what the process would be for a user to register their desire to use the internet access approach. They also queried the terminology 'whitelist' and 'blacklist' and considered these should be amended to use more appropriate language.

### DCC response

50. DCC notes that User engagement around internet connectivity will be set out and included in the DCC Internet Access Policy document which will be consulted upon in due course. DCC will also be reaching out to all Users ahead of testing to understand their required access approach. DCC acknowledges the point around terminology and will ensure appropriate terminology is adopted in the detailed drafting of the policy documents, which will be issued for consultation in due course.

## 2.6. Question 6

51. DCC sought views on its intention that all routine activity should occur via the SSI.

**Q6**

Do you agree with DCC's intention that all routine activities, including service requests, incident creation/updates etc, should occur via the SSI, and that email or telephone queries should only be supported for resolving issues related to accessing the SSI?

## Respondent views

52. Three respondents were broadly supportive of DCC's proposed approach, though two of these noted that there should always be an alternative mechanism available in case SSI is unavailable or when Parties cannot raise something correctly within SSI.
53. The fourth respondent raised several queries on this approach:
- The respondent queried what would happen with requests currently sent by email regarding access or uploading to the DCC SharePoint, or for general enquiries to a User's account manager. They also considered that email needs to be retained where confirmation is required by a non-SSI user, such as the SMKI SRO in relation to confirmation of ADTs being applied by DCC and notification of ADT warning or quarantine breaches.
  - The respondent asked what alerts will be available to prompt a user to check the SSI or know that ADTs have been applied. They believe email notifications are useful as it prompts the user, and queried if, under the FSM solution, the SSI would prompt the user to check on recent updates. They also noted that SSI tickets are currently automatically closed by DCC without authority from the SSI user, and queried if this would be the same under the FSM solution.
  - They also queried if the FSM solution would allow only the user (and nominated contact) to update a ticket or incident on behalf of the DCC User. Given there is no alert that the ticket or incident has been updated, the SSI user who raised this may not be aware of the change, and they queried if such an alert would be included in the FSM solution. They also queried the intention regarding access to tickets and incidents in the SSI and if this should be restricted, noting all SSI users can currently access and view all of these.
  - The respondent considered that for SSI to be used as the main communication point for incidents and tickets, there needs to be revision made so that the SSI user has the option to sort by the incidents and tickets they have raised. They considered a dashboard of the incidents that an SSI user has raised would significantly reduce time and effort in searching. They queried if the SSI would include a tracking system that users could use.
  - The respondent noted they had worked closely with DCC to implement an incident management process intended to collaboratively resolve incidents as quickly as possible, and requested these improvements continue and not be overridden by the FSM solution.
54. DCC also received a comment from the Department during the consultation querying how Parties who had not completed the additional testing required to access the FSM solution would be able to submit 4G CH forecast and orders.

## DCC response

55. DCC acknowledges the points around there needing to be an alternative mechanism, and notes that the alternative means to contact the Service Desk via email or phone will remain available to Parties as per the requirement in SEC Section H8.19.
56. DCC has reviewed the comments raised in paragraph 53 above, and our responses to each point are set out below. We are not proposing any changes to the regulatory drafting in response to these comments.
- The ability to contact DCC via email will be retained. The preferred contact route will be via the SSI, as per the requirements of SEC Section H8.19(a), but in the event a user couldn't access the SSI or if the SSI was unavailable then users will be able to use email.
  - DCC is not proposing any changes to the processes or timings around how alerts and emails are sent or how tickets are closed. Where an email is sent now, one will continue to be sent, although this may be generated automatically rather than manually. Please also see our response to question 7 below regarding disabling email notifications.

- An alert will be generated following any updates to tickets or incidents, and these will be sent to the user that raised the ticket and to any other named users on that ticket. A user will also be able to see and update any tickets where they have been given the relevant access rights as will be defined in the SSI Functions and Roles Policy.
- DCC will add the proposal regarding a dashboard and tracking system to the list of improvements we will investigate (see question 12). There are also numerous filtering options available in ServiceNow, which will be available to users.
- DCC's intention is to keep all existing process as unchanged as possible, or to build in any further improvements, and this will include the improvements developed with the respondent.

57. DCC notes the intention is that any Parties that had not completed the testing required to be eligible to access the FSM solution would be able to submit any 4G CH forecast and orders via the Service Desk using email or phone in the interim period between go-live and their completing this testing. DCC has updated the section of the NETMAD relating to access to the Service Desk to set this out.

## 2.7. Question 7

58. DCC sought views on its intention that all DCC contact with Users should occur via the SSI.

**Q7**

Do you agree with DCC's intention that all DCC contact with and responses to Users should occur via the SSI?

As part of your response, we seek your views on whether Users should be allowed to disable email notifications for new notifications within SSI.

### Respondent views

59. One respondent agreed with DCC's proposed approach to contact with Users, believing having one communication channel as easier to manage. They also noted the benefit of having access to their own account manager within DCC. They would want to maintain that contact, although support the definition of reportable defects or issues that could be streamlined into SSI. Another respondent also supported the proposal, noting they currently use the SSI as their primary communication channel.
60. One respondent disagreed that all contact and responses should occur via the SSI, querying what would happen if the SSI was unavailable or undergoing an outage. Another respondent agreed with the concept of routine contact being made via the SSI, but also considered there would be scenarios where email or phone contact would be needed, such as for Major Incidents and other urgent cases.
61. One respondent felt that users should be able to disable email notifications, and that it should not be a general rule applied to all users. The respondent considered DCC would have met its obligation to notify users via the SSI regardless of whether an email notification had been sent of this. The respondent did also query how and to who ADT warnings and quarantines would be communicated to. Another respondent agreed this should be left to each user to determine but recommended that there be checks to ensure that at least one person at each Party is receiving email updates.
62. Two respondents felt that users should not be allowed to disable email notifications. One respondent was concerned this would lose a visibility channel and would require users to log in to the SSI to view notifications. They considered that users could manage the number of emails they receive via appropriate rules within their mailbox if they wished to minimise email traffic. The other respondent noted this is important to prevent important updates being missed, though

considered it should be possible to easily choose which items a user wishes to receive notifications for.

#### DCC response

63. DCC acknowledges the points around there needing to be an alternative mechanism in the event of the SSI undergoing an outage, and notes that the Service Desk can continue to be contacted, and DCC able to respond, via email or phone if the SSI is unavailable.
64. DCC notes the differing views from respondents on whether users should be able to disable email notifications. This point was also discussed previously at the SMWG, and the group had concluded that allowing customers to disable email notifications introduced unnecessary risk for little benefit. This area also scored the lowest in the prioritisation activity undertaken with the SMWG. Given this, DCC does not intend to allow users to disable email notifications for individual service users and modules.

## 2.8. Question 8

65. DCC sought views on its proposed approach to MFA.

**Q8**

Do you agree with DCC's proposed approach to MFA?

As part of your response, we also seek your views on which option(s) you expect to use and, if you plan to use an authentication app, whether there is one that you prefer.

#### Respondent views

66. All four respondents supported DCC's proposed approach to MFA, as long as this met the regulation set out by the SSC.
67. Three of the respondents supported the use of Microsoft Authenticator as the standard approach, with several already using this within their organisations. The fourth expressed a preference for Google Authenticator, believing this should work with the solution.

#### DCC response

68. The FSM solution will formally support Microsoft Authenticator, and DCC recommends this tool. DCC will also include Google Authenticator as one of the authenticator apps it will support on a best-endeavours basis, (i.e. DCC will test that SSI works with these apps and provide some customer support for any basic queries but cannot take any responsibility if there are complex or fundamental issues with these apps). DCC will continue to engage with Parties to understand if there are any further popular apps that may need to be supported in this way.

## 2.9. Question 9

69. DCC sought views on its proposed connectivity requirements to the FSM solution.

**Q9**

Do you agree with DCC's proposed connectivity requirement?

As part of your response, we would also appreciate your explicit response on whether your organisation can provide the requisite access to Microsoft, or would require DCC to offer an alternative solution for you.

### Respondent views

- 70. All four respondents supported DCC's proposed connectivity requirements.
- 71. The respondents all noted their ability to support the Microsoft login page, although one noted an alternative solution may also be required and sought more detail on what the solution would be.

### DCC response

- 72. DCC notes the view that an alternative solution may also be required. DCC will provide an alternative solution where customers will be able to use ServiceNow login details instead of using Microsoft Entra. This will be expanded upon further in the DCC Internet Access Policy which will be consulted on later in 2025.

## 2.10. Question 10

- 73. DCC sought views on its proposal to allow internet access to SSI.

### Q10

Do you agree with DCC's proposal to allow internet access to SSI, including the restriction to allow only parties who do not have a DCC Gateway option and which have been whitelisted?

### Respondent views

- 74. Three respondents supported the proposal to allow internet access to the SSI. Two of the respondents agreed that primary access should be via the DCC Gateway connection, but one noted this may be prohibitive for smaller Parties, and the other believed there should be an alternative mechanism and that this seemed the most secure and sensible.
- 75. The fourth respondent didn't offer a view either way, noting they access the SSI via a Shared Resource Provider's Gateway Connection. They noted the reference to a Party using an internet connection to access the OMS but commented that this would also provide the user with access to the SSI as both functionalities would be available to Parties without a physical connection. They also queried whether there were any ownership requirements around the Internet Protocol (IP) address a user would have to comply with for the DCC to allow access to the SSI across the internet.

### DCC response

- 76. DCC notes the support for its proposal to allow internet access to the SSI and will be taking forward this proposal.
- 77. DCC acknowledges the reference regarding access to OMS and SSI via an internet connection. There is no planned segregation between these modules. If any segregation is required, then this can be managed by what roles a user is given access to in accordance with the SSI Functions and Roles Policy. This will be clarified in the policy documents.
- 78. Regarding ownership requirements around the IPs, there are not any restrictions. However, fixed IP addresses will need to be used, as is currently the case with the existing DSMS. This will be included as part of any discussions around the detailed migration approach and in the forthcoming industry consultation on the DCC Internet Access Policy drafting.

## 2.11. Question 11

- 79. DCC sought initial views on its proposal to remove the ability to release quarantine files, and whether this should be explored further.

**Q11**

Do you agree that DCC should further develop and consult on its proposal to remove the ability to release quarantined files from the FSM platform?

### Respondent views

- 80. Three respondents supported the proposal that this be further developed, discussed and consulted upon. This would allow Parties to assess this proposal in more depth. One respondent noted they do not currently use this functionality, but believed it needed to be discussed with all Parties before any decision was made.
- 81. The fourth respondent disagreed with the proposal. They noted that while usage may be low, it is a useful function, especially for any scheduled Service Requests that are quarantined. They sought further details on the reduced delivery cost associated with this proposed change.

### DCC response

- 82. DCC notes the level of support received for progressing further engagement and consultation on this proposal, and any cost-benefit analysis would form part of that activity. DCC notes that the benefits will depend on the timing of the agreement of any changes in relation to the completion of the design, build and test phases of both the FSM Programme and the DSP Programme. Given this, DCC will review the appropriate timing for progressing this initiative further and will consult the industry further on this proposal in due course.

## 2.12. Question 12

- 83. DCC sought views on any further benefits respondents believed should be delivered on the FSM platform in the future.

**Q12**

Are there any further benefits that you believe DCC should deliver on the FSM platform in the future?

### Respondent views

- 84. One respondent supported the migration of all SharePoint functionality to SSI, as long as it was reasonably practical. The SharePoint sites are difficult to navigate and locate items within, and the migration of these as part of FSM would resolve these issues while making SSI the 'one stop shop' for all DCC related interactions.
- 85. One respondent believed DCC should look at monitoring and visualisation of the portal throughput. Being able to see figures and volumes of detections in real time are what drives ADTs, and being able to monitor this would be helpful to many users.
- 86. One respondent queried what was being proposed regarding Nominated Contacts.
- 87. One respondent noted there was no reference to other instructions made to DCC, such as configuration changes or ARO/SRO appointments or removals. They asked what is being proposed regarding these.

### DCC response

- 88. DCC thanks respondents for the proposals they have raised and will add these to its roadmap of further enhancements for the FSM platform.
- 89. The Nominated Contacts list will be managed via Service Requests through the SSI, and there will also be a page within the SSI to allow users to view, sort, search and export their Nominated

Contacts list for any organisation they are associated with. Other instructions made to DCC will also be managed via Service Requests through the SSI.

### 2.13. Question 13

90. DCC sought views on the proposed designation date for the enduring changes.

**Q13**

Do you agree with the proposed redesignation date for the enduring changes of 25 October 2025 (or as soon as reasonably practicable within one month thereafter)?

#### Respondent views

91. Two respondents agreed with the proposed designation date. One of these noted the importance of meeting this due to the support for Remedy running out in October 2025 and wished to avoid a situation where there is no support in place for SSI activity.
92. One respondent noted the recently announced delay to the implementation of FSM and considered that this designation date would need to be amended accordingly.
93. One respondent considered 25 October 2025 was too soon. They noted testing is required and data will need to be reviewed and confirmed by SSI users. They did not consider this consultation fully addressed the assurance of a smooth transition from the existing solution.

#### DCC response

94. Since this consultation was issued, DCC has undertaken a replan of its delivery of the FSM Programme. This has concluded that it is no longer possible to deliver the FSM solution on 25 October 2025, and therefore the enduring changes cannot now be designated on this date. On 18 December 2024, DCC was directed to produce an updated delivery plan for the FSM Programme and will shortly issue its consultation on this. We will be consulting on a revised designation date for the enduring changes as part of that separate consultation.

### 2.14. Question 14

95. DCC sought views on the proposed designation date for the transitional changes.

**Q14**

Do you agree with the proposed redesignation date for the NETMAD of 1 May 2025 (or as soon as reasonably practicable within one month thereafter)?

#### Respondent views

96. All four respondents agreed with the proposed date of 1 May 2025 (or within one month thereafter).

#### DCC response

97. As noted in our consultation, we intend for the NETMAD changes to be designated on 1 May 2025 (or within one month thereafter).



### 3. Summary of drafting changes

98. After reviewing the responses received, DCC has made the following changes to the legal text that was consulted upon:
- SEC Appendix AU: Addition of sub-paragraph (d) to clause 11.1 to confirm that submitting 4G CH orders and CH returns will be an area that will be included in the training.
  - SEC Appendix AU: Clarification changes to clause 11.14 to more clearly set out in which version of SEC Appendix R 'Common Test Scenarios Document' that the changes referred to will have come into effect.
  - SEC Appendix AU: Addition of clause 11.21 to set out that any Parties that have not completed the additional testing required to access the FSM platform at go-live will be able to submit 4G CH forecasts and orders via the Service Desk using email or phone for the interim period until they have completed this testing.
99. The updated versions can be found in Attachments 1-16 to this document.
100. In parallel with this consultation, DCC has also issued its consultation on the regulatory changes needed to deliver the Future Connectivity North (FCN) Project. Two of the changes that are being proposed are to change the defined terms '4G Central/South' to '4G North/Central/South' and 'North' to 'LRR North'. These terms are used several times within SEC Appendices H and I, and the FSM Programme changes will also insert some new references to this term within these documents. Due to the timelines of these two consultations, these conclusions for the FSM Programme are being issued before the conclusions on the FCN Programme changes, but the regulatory changes for the FCN Project are expected to be implemented before the regulatory changes for the FCN Programme. Therefore, any reference to '4G Central/South' or 'North' in the versions of SEC Appendices H and I that are attached to this conclusions document should be deemed to be amended to '4G North/Central/South' and 'LRR North' respectively, if the regulatory changes for the FCN Project are approved and designated before the designation date for the enduring changes for the FSM Programme.
101. DCC will issue a further consultation in due course to consult upon the detailed drafting for the new SSI Functions and Roles Policy and DCC Internet Access Policy documents and updates to the SSI Baseline Requirements Document required for the FSM solution. These changes will then need to be approved by the SEC Panel prior to their being implemented.

### 4. Next steps

102. DCC is of the view that it has had appropriate engagement and consultation with industry on the proposed transitional and enduring changes to the SEC for the FSM Programme. As the responses to the consultation and engagement in industry were supportive of the proposed drafting, DCC will submit these to the Department for incorporation into the SEC.
103. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the proposed changes and, as such, further consultation is neither necessary nor appropriate.
104. In summary, DCC considers that the transitional and enduring regulatory changes for the FSM Programme are fit for purpose.

## 5. Attachments

- Attachment 1: Proposed changes to SEC Section A for FSM
- Attachment 2: Proposed changes to SEC Section F for FSM
- Attachment 3: Proposed changes to SEC Appendix D for FSM
- Attachment 4: Proposed changes to SEC Appendix H for FSM
- Attachment 5: Proposed changes to SEC Appendix I for FSM
- Attachment 6: Proposed changes to SEC Appendix J for FSM
- Attachment 7: Proposed changes to SEC Appendix K for FSM
- Attachment 8: Proposed changes to SEC Appendix R for FSM
- Attachment 9: Proposed changes to SEC Appendix S for FSM
- Attachment 10: Proposed changes to SEC Appendix T for FSM
- Attachment 11: Proposed changes to SEC Appendix V for FSM
- Attachment 12: Proposed changes to SEC Appendix W for FSM
- Attachment 13: Proposed changes to SEC Appendix AA for FSM
- Attachment 14: Proposed changes to SEC Appendix AH for FSM
- Attachment 15: Proposed changes to SEC Appendix AI for FSM
- Attachment 16: Proposed changes to SEC Appendix AU for FSM