



# SMETS1 Consultation on FOC Testing Changes

A consultation on changes to the SEC Variation Testing  
Approach Document for SMETS1 Services (SMETS1 SVTAD)

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# 1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems.

The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process and also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the Smart Energy Code<sup>1</sup> (SEC) and the latest version (AK 5.0) was included in version 23.0 of the SEC on 7 October 2020.

This consultation covers changes to the SMETS1 SVTAD to support changes to the FOC delivery approach and associated milestones that form part of the Smart Metering Programme Joint Industry Plan (JIP) which were agreed at the SMDG meeting on 8 October 2020.

## 2. FOC Testing Changes

The recent JIP change request process has set out the approach for FOC based on primary and secondary releases. In support of the primary release, DCC is proposing two changes to the SMETS1 SVTAD. Further changes may be required to support the secondary release, and if so, these will be separately consulted upon in due course.

For FOC, previously DCC selected five DMCs as described in DCC's conclusion document titled '[Conclusions on the SMETS1 FOC SIT: Proposed DMC Selection and Rationale](#)' which was published<sup>2</sup> on 20 December 2019. DCC selected the five most prevalent DMCs for MT and SIT, accounting for 42% of the FOC total deployed estate at the time of consultation. The vast number of DMCs in the FOC cohort drove the decision to test five in MT and SIT, as this was required to get a significant level of coverage of the FOC estate. As a result of the JIP change request, DCC is now proposing to test the primary release against two of those original five DMCs.. This leaves three DMCs that have been selected for use in a Migration Test Phase/SIT Test Phase, but, should it be required, further SIT or Migration Testing is not planned until March 2021 in support of the secondary FOC Release.

Currently any DMCs that have been selected for use in a SIT or Migration Test Phase are excluded from the DMCT Process in Clause 20 of the SMETS1 SVTAD. The first proposed change is to allow DCC to undertake testing via the DMCT Process for DMCs that have been selected for a Migration Test Phase and/or SIT Test Phase in respect of FOC if required. This would enable the aforementioned three DMCs to be entered onto the EPCL in advance of the secondary FOC release. DCC considers that this will allow SMETS1 migrations, and thus benefits, to be delivered sooner for FOC installations operating in credit mode.

<sup>1</sup> <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

<sup>2</sup> <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/conclusions-on-the-smets1-foc-sit-proposed-dmc-selection-and-rationale/>.

The rationale for not formally de-selecting the three DMCs for use in Migration Testing and SIT at this time is that the migration design for the FOC secondary release, which will deliver the capability suitable to migrate installations operating in prepayment mode, has not yet been agreed and therefore further testing in a Migration Test Phase and/or SIT Test Phase for the FOC secondary release may still be required.

The second proposed change to the SMETS1 SVTAD will allow DCC to de-select DMCs previously selected for use in a Migration Testing and/or SIT Test Phase where DCC considers this necessary in order to deliver the benefits of the SMETS1 programme at the earliest possible opportunity. The current SVTAD drafting only allows such de-selection where a Testing Issue has been encountered using the DMC that warrants such de-selection.

The purpose of this change is to allow DCC to propose the de-selection of three of the current five DMCs prior to any further testing in respect of them starting, should this be considered the appropriate way forward. For example, DCC may formally de-select these DMCs if testing in a Migration Test Phase and/or SIT Test Phase for the FOC secondary release is not required. The governance of such de-selection decisions would remain unchanged, however. This governance regime requires DCC to consult with the TAG prior to DCC deciding to de-select a DMC (as per Clause 13.6 of the SMETS1 SVTAD). The governance regime also provides a right for each Supplier Party to refer DCC's decision to de-select to the Secretary of State where the Supplier Party disagrees with the decision by DCC (as per Clause 13.7 of the SMETS1 SVTAD).

These changes are provided for via a limited number of changes to the SMETS1 SVTAD drafting:

- the rationale for proposing de-selection of DMCs previously selected for use in Migration Testing and/or SIT in Clause 13.5 is aligned to the overall SMETS1 objective of expediting the migration of SMETS Installations as soon as practicable;
- the defined term 'In-Scope DMCs' is amended to reflect the change in Clause 13.5;
- the defined term 'MOC or FOC SIT DMCs' is changed to be 'MOC SIT DMCs' given the proposed changes elsewhere in the document for FOC; and
- there are changes to Clause 20.1-20.2 and additional Clauses 20.2A-20.2B in order to support testing of DMCs selected for use in Migration Testing/SIT via the DMCT Process.

In addition to the changes described above there are a few minor changes within the SMETS1 SVTAD drafting to address typographical errors and improve clarity.

**FOC  
TEST  
Q1**

Do you agree with the proposed changes to the SMETS1 SVTAD to support the revised approach to delivery of the FOC primary release? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

### 3. Next Steps

To conclude on this consultation, DCC will take into account respondents' views, and prepare a conclusions report for the Department for Business, Energy and Industrial Strategy (BEIS) consistent with Clause 4.2 of the SMETS1 SVTAD. The conclusions report will set out a summary of responses received and detail on how DCC have addressed any concerns raised. Unless the Secretary of State directs otherwise, DCC is proposing to amend the SMETS1 SVTAD on 6

November 2020 pursuant to the provisions for it to do so within Clause 4.2 of the SMETS1 SVTAD utilising the draft notification text presented in Attachment 1.

**FOC  
TEST  
Q2**

Do you agree with the proposed amendment of the SMETS1 SVTAD by the DCC on 6 November 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?

## 4. How to Respond

Please provide responses in the attached template by 1600 on 23 October 2020 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk). This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website [www.smartdcc.co.uk](http://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 for 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](mailto:consultations@smartdcc.co.uk).

## 5. Attachments

Attachment	Title
1	Draft Notification Text on FOC Testing Changes
2	Response Template
3	SMETS1 SVTAD AK 5.1 draft – delta against current version

**Table 1 - Attachments**

## Attachment 1

This attachment contains the text that DCC plans to use for notification of a change to the SMETS1 SVTAD.

### **SMETS1 SVTAD Draft Direction Text**

*Words and expressions used in this notification shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.*

*Pursuant to Clause 4.2 of the SMETS1 SVTAD, DCC notifies that, with effect from [DD MMM YYYY] that the SMETS1 SVTAD is hereby modified in the form set out in Annex [AAA] of this notification.*

*For the avoidance of doubt such modification of the SMETS1 SVTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being approved, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).*

*This notification is also being sent to the SEC Administrator.*