

Consultation

**Changes to CTSD and ETAD
November 2020 SEC Release**

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1. Introduction

The November 2020 SEC Release is expected to introduce changes to the Smart Energy Code (SEC) that include both modifications raised and approved through industry governance, and changes directed by the Department of Business, Energy and Industrial Strategy (BEIS) under their transitional governance of the Smart Metering Implementation Programme. The changes arising from SEC modifications have already been consulted upon by SECAS as part of the SEC modification process. DCC is consulting on the proposed amendments to the SEC Subsidiary Documents that are required to support the BEIS directed changes.

The “BEIS Q4 2020 Package” requires a range of changes to the SEC that are required to support the following:

- the changes referred to in section 7 of the BEIS consultation on “changes to Standard Conditions of Gas and Electricity Supply Licences, conditions of the DCC Licence, the SEC, the UNC and the MRA”, published on 14 January 2020 (which essentially propose to amend the SEC to introduce a new type of Organisation Certificate with a Remote Party Role of “xmlSign”);
- the changes referred to in chapters 3 and 4 of the BEIS consultation on “the DCC’s provision of an enrolment service for EDMI SMETS1 meters; changes to DCC, Electricity and Gas Supply Licence Conditions; and changes to the SEC, BSC and UNC”, published on 6 April 2020 (which propose to amend the SEC to introduce functionality to support Standalone Auxiliary Proportional Controllers (SAPCs) and Auxiliary Proportional Control (APC) functionality for Electricity Smart Metering Equipment (ESME) and further arrangements relating to the Issuing of Organisation Certificates with a Remote Party Role of “xmlSign”); and
- the associated changes to SEC Schedules and Appendices required to support the above changes. This includes an additional SMETS document as well as additional Versions of CHTS and GBCS, respective draft versions 5.0, 1.4 and 2.1, which have been consulted upon by BEIS and are available on the SECAS website.

The DCC has published three consultations related to the BEIS Q4 2020 changes. They are:

- Consultation on changes to the DCC User Interface Specification (DUIS) and Message Mapping Catalogue (MMC) ahead of the November 2020 SEC Release;¹
- Consultation on the draft November 2020 SEC Variation Testing Approach;² and
- Consultation on the draft November 2020 SEC Release Testing Approach Document.³

This consultation is seeking views on the DCC’s proposed changes to the Common Test Scenarios Document (CTSD) and Enduring Testing Approach Document (ETAD) following the uplift to DUIS 4 (as was consulted on per the first bullet point above).

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/changes-required-to-deliver-against-beis-q4-package-to-be-included-in-the-november-2020-sec-release/>

² <https://www.smartdcc.co.uk/customer-hub/consultations/november-2020-sec-variation-testing-approach/>

³ <https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-the-draft-testing-approach-document/>

This consultation also seeks views, on behalf of the Secretary of State, on the date for designation of the CTSD and ETAD, which would bring the revised versions into legal effect. A draft Direction is attached to this consultation in Attachment 1.

The closing date for this consultation is Wednesday, 05 August 2020.

2. Changes to the Common Test Scenarios Document

The Common Test Scenarios Document (CTSD) sets out in further detail testing requirements covered in Section H14 of the Smart Energy Code (SEC) covering the arrangements for relevant Parties to act as DCC Users and interoperate with the DCC. As part of the process for becoming a (DCC) User in a specific User Role, a Party is required to conduct User Entry Process Tests (UEPT) against the scenarios that are set out in the CTSD for that User Role.

A key reason for revising the CTSD has been to ensure that the Test Scenarios included in the document, against which prospective DCC Users will undertake the UEPT, are aligned with the updated version of the DUIS. These are included as tracked changes in the CTSD published alongside this consultation.

The key changes we are proposing to introduce in this consultation are:

- For a Party completing UEPT for the first time, they can, subject to DCC agreement, descope certain Service Requests (SRs) which are not essential for them to operate in a particular User Role;
- For new SRs introduced by new releases of DUIS, or for any SRs that were descope from UEPT, Parties must complete Additional SR testing prior to being eligible to use them in production; and
- For Parties carrying out Additional SR testing, the ability to do so via the formal UEPT route or via Device and User System Testing (DUST).

Additionally, the introduction of Additional SR Testing as a generic concept removes the necessity for specific UEPT arrangements for DCC functional releases, and as such we propose to remove the following sections in the CTSD as they would be no longer applicable.

- Additive UEPT in respect of Release 2.0 Functionality;
- Eligibility Testing in accordance with the User Testing Services Approach Document (UTSAD) under the SVTAD for SMETS1; and
- Additive UEPT in respect of November 2019 SEC Release.

As a result of removing the section on "Eligibility Testing in accordance with the UTSAD under the SVTAD for SMETS1" (section 1.1.2), we will need to produce an updated version of the UTSAD. We are producing a separate consultation which will be published after this consultation.

Finally, in the light of the removal of some sections of the CTSD, we have taken the opportunity to make some formatting improvements, including the addition of paragraph numbers in the main body of the document.

2.1. Summary of Key Changes

Section 5 UEPT Procedure sets out the procedure that must be completed in order for Parties to complete UEPT or Additional SR Testing.

Section 5.1 DUIS Service Requests, has been amended to include a new section on Descoping of Service Requests.

Clause 8.1.5 of the CTSD sets out the Service Requests that a Party is required to have tested prior to it being eligible to send those SRs in a particular User Role. In this consultation, we are proposing to simplify the process for Parties who do not intend to use certain functionalities in production by introducing the concept of descoping DUIS Service Requests (including descoping of a Command Variant), Device Alert, DCC Alerts or a Response Code.

The UEPT and Additional SR Test Completion Certificate has been amended to reflect this simplification. The certificate will now capture all of the SRs a Test Participant has successfully executed in either UEPT or Additional SR Testing and will therefore be able to run those SRs in production.

2.1.1. Descoping of DUIS Service Requests, etc.

Existing DCC user have flexibility about when they take up new functionality and carry out additional testing associated for new releases. This flexibility does not currently apply to new users going through User Entry Process Testing (UEPT) for the first time as they need to complete the full scope of UEPT as documented in the CTSD even if they are not intending to use functionality that is being testing.

Therefore, for a Party completing UEPT for the first time, DCC is proposing to allow a Relevant Party to descope a subset of Service Requests (including descoping of a Command Variant), Device Alert, DCC Alerts or a Response Code from UEPT as set out in Clause 8.1.5 where:

- the Testing Participant will not use this functionality in production and therefore does not wish to become an Eligible User of this functionality; or
- the Testing Participant is unable to produce a Response Code due to their internal systems error handling.

However, such descoping will only be permitted to the extent that those SRs that are tested include those that the DCC reasonably considers constitute the minimum set of SRs that would be required for that Testing Participant to operate in the relevant User Role.

Under this proposal, if a Testing Participant wishes to descope a subset of SRs, Device Alert, DCC Alerts and/or Response Code, this information must be submitted to DCC via their UEPT test plan. As part of this submission, the Testing Participant will have to explain their rationale for descoping. DCC will review this submission and confirm in writing whether we agree with this descoping in line with the timelines set out in Table 1 of the CTSD.

If DCC reasonably considers that the proposed descoping set out by the Testing Participant does not fulfil the minimum set of SRs that the DCC considers would be required for that Testing Participant to operate in its User Role, then we will not agree to the proposed descoping and the Testing Participant will have to undertake all tests that DCC does not agree to descope. Although

the Testing Participant will not be able to formally “appeal” this decision, DCC considers that the pragmatic, two-way process offers an opportunity to reduce the amount of testing for Testing Participants. DCC welcomes views on this new approach.

If a Testing Participant subsequently wishes to be eligible to send a SR that was descope from their original UEPT they must successfully test this either via the UEPT procedural steps (as documented in Table 1, Table 3 and Table 5 in the CTSD) or the Additional SR Testing procedural steps (as documented in Table 2, Table 4 and Table 6 in the CTSD), prior to sending that SR in DCC Live Systems.

2.1.2. Completing Additional SR Testing

DCC is looking to provide a generic approach to User Testing for current and future releases. This removes the necessity for specific UEPT arrangements for DCC functional releases and gives Parties a clear indication of the User Testing needed for any future releases. Section 5.3 has been added to explain the requirements for a Testing Participant who has completed UEPT for a User Role and is seeking to become:

- An Eligible User for Service Requests that the Party has previously descope from their prior completion of UEPT; or
- An Eligible User for any Service Requests that have been introduced since the Party completed UEPT for a User Role in which they operate.

The Testing Participant will not be an Eligible User for any descope or newly introduced SRs until they have completed testing of the descope or newly introduced SRs in respect of that User Role.

We are proposing that Additional SR Testing may be completed by the following routes:

- via the process as documented in Table 1, Table 3 and Table 5; or
- via Device and User System Testing (DUST) as documented in Table 2, Table 4 and Table 6, where the Testing Participant is already actively participating in DUST.

If a Testing Participant that has previously completed UEPT in a particular User Role is not currently active in DUST, but wishes to use the process in Tables 2, 4 and 6 for Additional SR Testing in respect of that User Role, they must complete the entry process into the test environment used for DUST, as set out in Table 1 of the Enduring Test Approach Document, prior to being able to carry out such testing. The Testing Participant will have to receive confirmation from the DCC of the successful completion of Additional SR Testing of the SRs being tested prior to being able to carry out further testing of the SRs in DUST.

2.1.3. Procedural Steps for Additional SR Testing via formal UEPT or DUST

We have revised the Section 5.5 and 5.6 so that Parties can carry out additional SR testing via the UEPT route or via DUST.

Section 5.6, Procedural Steps for initiation of Additional SR Testing via DUST, provides a table which sets out the steps that must be undertaken during initiation of the Additional SR Testing by both the DCC and the Testing Participant seeking to undertake such testing via DUST and the timeframes within which such steps must be complete.

For Testing Participants wishing to carry out Additional SR Testing via the UEPT process, DCC and Testing Participant should follow the steps and timeframes as set out in Table 1 in Clause 5.5.1.

2.2. Recommended Testing Guidance

As part of Releases, DCC provides Testing Guidance ahead of the UIT window. This will cover information on test execution steps that parties may need to follow as well as any recommendations on areas that Parties should test.

2.2.1. Existing ALCS/HCALCS SRs and GBCS4.0 ESME

Whilst not mandatory, for Users using Existing SRs for Auxiliary Load Control Switches (ALCS)/ HAN Connected Auxiliary Load Control Switches (HCALCS), as set out in the bulleted list below, DCC is recommending re-testing of these SRs as 'highly advisable' if they wish to use GBCS4.0 ESME. This is because the processing pattern will be different and Users will wish to ensure their back-end systems continue to operate as expected.

- SR 6.14.2 Update Device Configuration (Auxiliary Load Control Scheduler); (ECS46c)
- SR 7.5 Activate Auxiliary Load (ECS47)
- SR 7.6 Deactivate Auxiliary Load (ECS47)
- SR 7.8 Reset Auxiliary Load (ECS47)
- SR 7.7 Read Auxiliary Load Control Switch Data (ECS61a)

2.2.2. XML Signing Certificates

In January 2020, BEIS consulted on changes to introduce a new type of SMKI Organisation Certificate, that of "XML signing". Discussions at the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) and Security Sub Committee indicated that there is benefit in the differentiation of the Private Keys used to Digitally Sign GBCS Payloads and those used to sign XML wrappers. As a result, a new type of Organisation Certificate - an "XML signing" Certificate – is being introduced. This would allow Users or Registration Data Providers to become subscribers for these new types of certificates and permit them to use the associated Private Key to sign the XML wrappers, while reserving "DigitalSigning" Private Keys for signing GBCS payloads.

In April 2020, BEIS consulted further on changes the SEC, BSC, and UNC to support the inclusion of registration data identifiers with XML signing certificates. BEIS's principal reason for introducing the new type of Certificate is to support additional processes that will be associated with the implementation of Enduring Change of Supplier (ECoS) arrangements. BEIS decided to introduce the new XML signing certificate early to give energy suppliers the opportunity to use them in advance of the ECoS arrangements taking effect. Should energy suppliers wish to use the new XML signing certificate, testing is advised.

There is no mandatory User testing associated with these changes but DCC recommends carrying out testing of this functionality ahead of using in production. DCC will provide further guidance as part of the Testing Guidance.

2.3. Supporting Documentation

We have provided a tracked change version of the CTSD document compared to the extant CTSD, alongside this consultation, as well as a clean version of the document incorporating the proposed changes.

3. Changes to the Enduring Test Approach Document

The Enduring Testing Approach Document (ETAD) describes the detailed procedural and technical requirements for the Testing Services, as defined in Section H14.1 of this Code, that the DCC will make available to Testing Participants on an enduring basis. Unless indicated otherwise this ETAD applies to Testing Services in respect of SMETS1 Devices and SMETS2+ Devices.

3.1. Summary of Changes

A minor change has been made in Section 6, Requirements for Use of DCC Test Labs, where we changed the word 'devices' into 'Devices' so the SEC definition now applies.

6.5 Where a Testing Participant wishes to install their own *Devices*, in a DCC physical test laboratory, the Testing Participant must provide the following to the DCC prior to installing a device in a DCC physical test laboratory.

Section 7, User Entry Process Test, has also been updated. Section 7.1 currently states that DCC physical test laboratories will house sets of Devices or the DCC will provide tests stubs for SMETS2+ Devices. We have now added a reference to 'emulators' recognising that DCC provides equipment which can emulate the functional aspects of smart metering Devices as well as stubs which do not.

References to Auxiliary Load Control, Standalone Auxiliary Proportional Controller and HAN Controlled Auxiliary Load Control have also been added to Section 7.

3.2. Further Anticipated Changes to the ETAD

A recent review of interoperability on change commissioned by BEIS recommended that DCC update their test approach documentation to include device manufacturer related testing services, and to validate with those parties that the services are fit for purpose. As a result of this recommendation, DCC have been reviewing the testing services that we offer to SEC Parties, and through consultation with industry have identified several additional service offerings that could be made available. Some of these include providing the capability to facilitate Radio Frequency (RF) noise testing, regular scheduled interoperability test events and an enhanced GBCS For Industry (GFI) that provides more of a "DCC in a box" test capability. DCC are currently drafting proposed wording to cover these services to be included in ETAD and will seek to obtain industry party views at the appropriate time.

Where DCC chooses to take forward these changes, we plan to raise a SEC modification to implement them in the coming months. We look forward to discussing the details further with SEC Parties via the SEC modification process.

3.3. Supporting Documentation

We have provided a tracked change version of the ETAD document compared to the extant ETAD, alongside this consultation, as well as a clean version of the document incorporating the proposed changes.

4. Secretary of State Designation date for CTSD and ETAD

DCC has discussed the designation of the CTSD and ETAD 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 CTSD and ETAD, BEIS will designate the CTSD and ETAD on 21 September 2020 or as soon as reasonably practicable within one month thereafter. The reason we are proposing this date is because the updated versions of the CTSD and ETAD need to be in place before the opening of the User Integration Testing window in the November 2020 SEC Release delivery plan. The draft Direction is presented in Attachment 1 of this consultation document for stakeholder consideration.

5. 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 CTSD and ETAD for the November 2020 SEC Release that it considers suitable for re-designation into the SEC.

DCC will also be consulting on the UTSAD after this consultation.

DCC will conclude on this consultation in late August or early September 2020.

6. Questions for Respondents

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

Q1	Overall, do you support the proposed amendments to the CTSD summarised in this consultation? If you do not, please provide a rationale for your answer.
Q2	Do you support the proposal that Test Participants should submit any proposed descoping of tests of the DCC, and that where DCC reasonable considers that the proposed descoping does not fulfil a minimum set required for a User Role, DCC may withhold the ability to descope? If you do not, please provide a rationale for your answer.
Q3	Overall, do you support the proposed amendments to the ETAD summarised in this consultation? If you do not, please provide a rationale for your answer.
Q4	Do you agree with the proposed re-designation date of 21 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the CTSD and ETAD?

7. How to Respond

Please provide responses by **16:00 on 5 August 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

8. Attachment 1 - Draft CTSD and ETAD Direction Text

This attachment contains the text that BEIS plans to use for direction of changes to the CTSD and ETAD.

CTSD Draft 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 re-designated for incorporation as the SEC Appendix R - Common Test Scenarios Document (CTSD).

In accordance with Condition 22.30 of the DCC Licence, the Secretary of State hereby directs that the CTSD which is by this direction being re-designated and incorporated into the Smart Energy Code shall apply and be interpreted as if each of the Schedules and Appendices published at [insert reference to SECAS website URL where revised November 20 SSDs are published] had been incorporated into the Smart Energy Code (until such time as each such Schedule or Appendix has been re-designated and incorporated into the Smart Energy Code).

For the avoidance of doubt such re-designation of the CTSD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.

ETAD Draft 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 re-designated for incorporation as the SEC Appendix J - Enduring Testing Approach Document (ETAD).

In accordance with Condition 22.30 of the DCC Licence, the Secretary of State hereby directs that the ETAD which is by this direction being re-designated and incorporated into the Smart Energy

Code shall apply and be interpreted as if each of the Schedules and Appendices published at [insert reference to SECAS website URL where revised November 20 SSDs are published] had been incorporated into the Smart Energy Code (until such time as each such Schedule or Appendix has been re-designated and incorporated into the Smart Energy Code).

For the avoidance of doubt such re-designation of the ETAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.