

Consequential changes to the SMETS1 SVTAD, UTSAD and ETAD arising from the November 2020 CTSD consultation.

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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. The "BEIS Q4 2020 Package" requires a range of changes to the SEC, which include those that are required to support the introduction of SAPCs in the November 2020 Release, as set out in a recent BEIS conclusions document<sup>1</sup>.

DCC is consulting on the proposed amendments to the SEC Subsidiary Documents that are required to support the BEIS directed changes. These include changes to the CTSD and the ETAD<sup>2</sup> that are due to take effect in early October, to support the start of the user testing window before the November 2020 Release goes live. The CTSD changes include a revised approach to UEPT and Additional SR Testing.

As part of its aforementioned conclusions document, BEIS set out amendments to Section H of the SEC to support the revised approach to UEPT and Additional SR Testing proposed in the CTSD consultation (see paragraph 114 of that conclusions document). These Section H changes are due to take effect in September.

To date, DCC has published four consultations on the BEIS Q4 2020 Package of 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;<sup>3</sup>
- Consultation on the draft November 2020 SEC Variation Testing Approach;<sup>4</sup>
- Consultation on the draft November 2020 SEC Release Testing Approach Document<sup>5</sup>; and
- Consultation on the Changes to the Common Test Scenarios Document (CTSD) and Enduring Testing Approach Document (ETAD) November 2020 SEC Release<sup>6</sup>.

Additionally, BEIS has also consulted on changes to Subsidiary Documents required to support the November 2020 Release<sup>7</sup>.

This current consultation follows from the changes proposed in the consultation 'Changes to the CTSD and ETAD November 2020 SEC Release'. In that consultation, DCC proposed the following key changes:

<sup>2</sup> <u>https://www.smartdcc.co.uk/customer-hub/consultations/changes-to-the-ctsd-and-etad-november-2020-sec-release/</u>

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<sup>&</sup>lt;sup>1</sup> <u>https://smartenergycodecompany.co.uk/latest-news/beis-consultation-response-government-response-to-6-april-2020-consultation-and-outstanding-matters-from-14-january-2020-consultation/</u>

<sup>&</sup>lt;sup>3</sup> <u>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/</u>

<sup>&</sup>lt;sup>4</sup> <u>https://www.smartdcc.co.uk/customer-hub/consultations/november-2020-sec-variation-testing-approach/</u>

<sup>&</sup>lt;sup>5</sup> <u>https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-the-draft-testing-approach-document/</u>

<sup>&</sup>lt;sup>6</sup> <u>https://www.smartdcc.co.uk/customer-hub/consultations/changes-to-the-ctsd-and-etad-november-2020-sec-release/</u>

<sup>&</sup>lt;sup>7</sup> <u>https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-changes-to-smart-energy-code-technical-specifications-and-subsidiary-documents/</u>

- For a Party completing User Entry Process Tests (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 descoped 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 removed the necessity for specific UEPT-type arrangements for DCC functional releases, and as such we proposed 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 User Testing Services Approach document (UTSAD) under the SVTAD for SMETS1" (section 1.1.2), we said that we would need to produce an updated version of the UTSAD and that we would produce a separate consultation. This is the follow up consultation.

In parallel to this consultation, DCC has published 'SMETS1 Consultation on improvements to the DMCT Process' which also proposes changes to the SMETS1 SVTAD. That consultation covers changes to the SMETS1 SVTAD to provide efficiency and clarity improvements to the SMETS1 DMCT Process which is captured within Clause 20 of the SMETS1 SVTAD. Since the changes are completely independent to each other, we decided to publish a separate consultation. We have, however, added the amendments arising from this consultation (showing in pink) to Appendix AK SMETS1 SVTAD **AK3.1** (draft), published alongside the former consultation, so that stakeholders can see both changes in one document. Appendix AK SMETS1 SVTAD **AK3.2** (draft) is published alongside the current consultation.

This consultation also seeks views, on behalf of the Secretary of State, on the date for designation of changes proposed in this document to the SMETS1 SVTAD and the ETAD in support of the November 2020 Release, which would bring the revised versions into legal effect. A draft Direction is attached to this consultation in Attachment 1 and 2.

#### The closing date for this consultation is Tuesday, 15 September 2020.

## 2. Removal of UTSAD

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 said in the Consultation on the CTSD and ETAD that we would need to produce an updated version of the UTSAD and that we would produce a separate consultation.

The UTSAD is a SMETS1 SVTAD required document rather than a SEC Subsidiary Document. The SMETS1 SVTAD refers to the UTSAD and the purpose of the UTSAD is to set out:

(a) supplementary rights and obligations with respect to the provision of Eligibility Testing Services by the DCC and the undertaking of Eligibility Testing by Parties;

(b) the criteria that need to be met prior to the point from which the DCC shall provide Eligibility Testing Services;

(c) supplementary arrangements governing SMETS 1 Interface Testing; and

(d) any steps that must be completed prior to being eligible to undertake Device and User System Testing in respect of SMETS1 Devices.

DCC has examined the necessary consequential changes further and came to the preliminary conclusion that:

- given that we are proposing to remove the Eligibility Testing requirements in the CTSD (as they are replaced with the Additional SR Testing arrangements), and
- as many of the elements of the UTSAD were transitional and therefore have been completed, such as in regards to SMETS1 Interface Testing and the entry requirements to initially open SMETS1 test services,

rather than update the UTSAD, it could be removed. For the small number of areas of the UTSAD that need to remain, we are proposing to either amend the SMETS1 SVTAD to include them (if transitional in nature) or amend the ETAD to include them (if enduring in nature). These proposed amendments are set out in the next section of this document.

It should be noted that if a further period of Interface Testing is ever required for any further SMETS1 releases, then a new UTSAD governing that period of testing could be produced with arrangements that are appropriate for such Interface Testing. Currently there are no such requirements for Interface Testing.

# SVTAD<br/>Q1Do you agree that, subject to the proposed amendments to the SMETS1 SVTAD and<br/>ETAD set out in Section 3, all other obligations in the UTSAD including entry<br/>requirements, Eligibility Testing and SMETS1 Interface Testing will no longer be<br/>required and the UTSAD can be removed?Please provide a rationale for your views.

## 3. Consequential Changes to the SVTAD and ETAD

Key changes to the SMETS1 SVTAD include:

- Removal of references to Eligibility Testing (Section 1 Definitions and Interpretations Table 1.1, Section 2 General 2.4(b), Section 5 SMETS1 Testing Objective 5.2(b), Section 8 Generic Testing Activities 8.4, Section 13 SMETS1 System Integration Testing 13.28(b), 13.29-13.31, and Section 16 Test Reporting 16.2, 16.3);
- Removal of references to User Testing Services linked to the Eligibility Testing (Section 1 Definitions and Interpretations Table 1.1, Section 5 SMETS1 Testing Objective 5.2(b), 5.6, Section 8 Generic Testing Activities 8.1(q), Table 10.1 Specific Deliverables, and Section 12 Test Procedure 12.3);
- Removal of the UTSAD as described above and from Section 1 Definitions and Interpretations Table 1.1 of the SVTAD SMETS1;
- Removal of the User Testing Services Guidance (Section 5 SMETS1 Testing Objective 5.6 and Section 10 Specific Deliverables 10.2); and
- Addition of variations to ETAD around what DMCs can be provided to Testing Participants for their testing which was originally included in the UTSAD but should remain on enduring basis (Section 13 SMETS1 System Integration Testing 13.30).

The reason we are proposing to remove references to the User Testing Services Guidance from the SVTAD SMETS1 is because DCC has an enduring obligation to provide User guidance via Section H of the SEC and the ETAD.

Key changes to the ETAD are:

• Addition of obligations on DCC and its Service Providers around the support provided to Testing Participants which was originally included in the UTSAD but DCC considers should remain on an enduring basis. These obligations have been made to apply to both SMETS2 and SMETS1 testing services as they are considered generic in nature. See new Section 13.

SVTAD Q2 Do you agree with the proposed changes to the SMETS1 SVTAD and ETAD? Do you have any detailed comments on the relevant changes to the legal drafting?

Please provide a rationale for your views.

## 4. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to BEIS an amended version of the SMETS1 SVTAD and the ETAD that it considers suitable for re-designation into the SEC by the Secretary of State. The ETAD that is submitted will combine the outcome from this consultation and the consultation issued in 07 July 2020.

DCC is aiming to provide a conclusions report to BEIS no later than 28 September 2020. DCC has discussed the re-designation of the SMETS1 SVTAD and ETAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the SMETS1 SVTAD and ETAD on 5 October 2020 or as soon as reasonably practicable within one month of that date.

The changes to the SMETS1 SVTAD to support the DMCT Process referenced in Section 1 of this document are currently proposed to be designated on 25 September (or within one month thereafter). While DCC tried to align the timelines of two sets of changes, this was not possible owing to tight timescales. Given that they relate to two separate DCC programmes, DCC is requesting two separate designations. This should not impact our customers in any way.

In order to expedite the re-designation of the SMETS1 SVTAD and ETAD in support of the November 2020 Release, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the SMETS1 SVTAD and ETAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

## SVTAD Q3

Do you agree with the proposed re-designation date of 05 October 2020 for updates to the SMETS1 SVTAD and ETAD related to the November 2020 SEC Release (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1 and 2?

## 5. How to Respond

Please provide responses in the attached template by 1600 on 15 September 2020 to DCC at <u>consultations@smartdcc.co.uk</u>. 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 <u>www.smartdcc.co.uk</u>. 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 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 <u>consultations@smartdcc.co.uk</u>.

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# 6. Attachments

Attachment	Title
1	Draft Notification Text on re-designation of SMETS1 SVTAD for the BEIS Q4 2020 Package of changes.
2	Draft Notification Text on re-designation of ETAD for the BEIS Q4 2020 Package of changes.
3	Response Template
4	SMETS1 SVTAD AL 3.2 – delta against version currently being consulted by DCC as part of 'SMETS1 Consultation on improvements to the DMTC Process'
5	ETAD Version J2.2 – delta against version consulted by DCC in July 2020 as part of 'Consultation on the Changes to the Common Test Scenarios Document (CTSD) and Enduring Testing Approach Document (ETAD) November 2020 SEC Release'

Table 1 – Attachments

## **Attachment 1**

This attachment contains the text that BEIS plans to use should it decide, having considered the outcome of the DCC consultation exercise, to direct changes to the SMETS1 SVTAD in support of the November 2020 Release.

#### SMETS1 SVTAD 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 SEC Variation Testing Approach Document for SMETS1 Services previously designated and incorporated into the SEC as Appendix AK is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the SEC Variation Testing Approach Document for SMETS1 Services 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.

## Attachment 2

This attachment contains the text that BEIS plans to use should it decide, having considered the outcome of the DCC consultation exercise, to direct changes to the ETAD in support of the November 2020 Release.

#### 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 Enduring Testing Approach Document previously designated and incorporated into the SEC as Appendix J is hereby redesignated and incorporated in the form set out in Annex [XX] to this direction.

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.