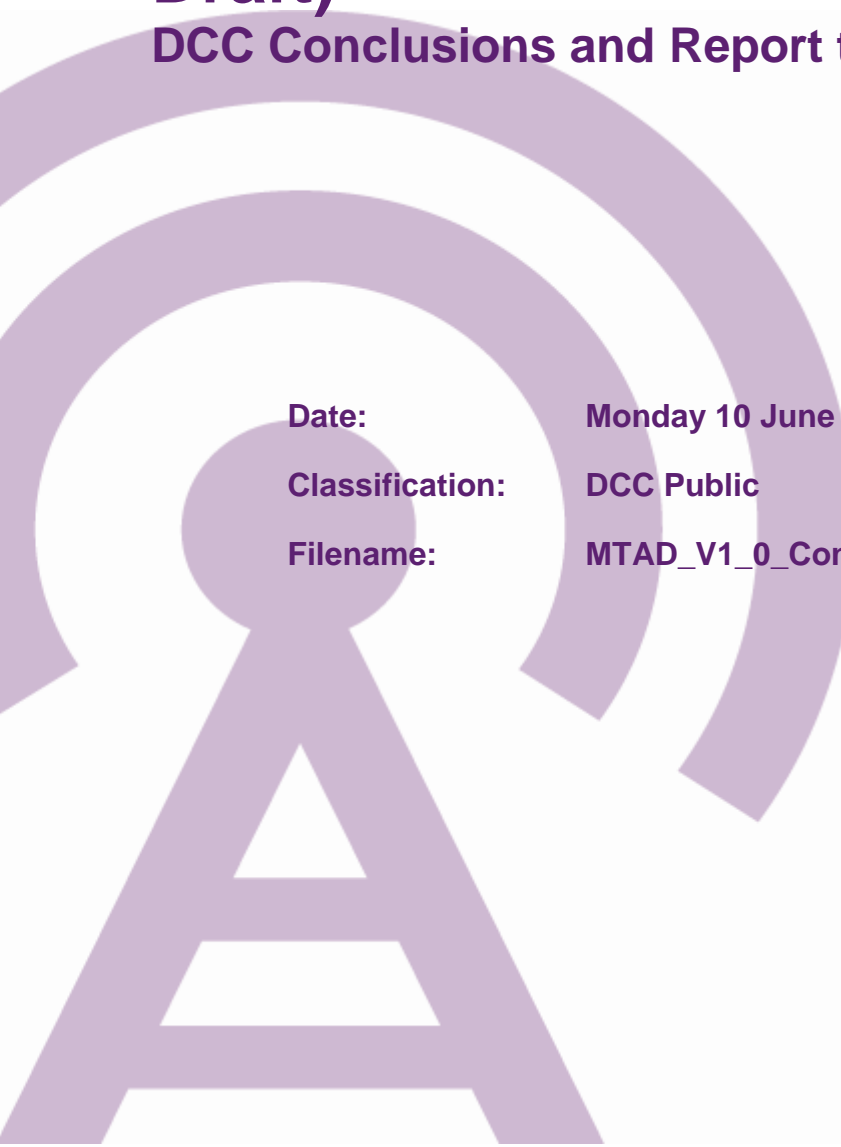# Data Communications Company

Migration Testing Approach Document for SMETS1 Services (MTAD v1.0 Draft)

DCC Conclusions and Report to Secretary of State

Date: **Monday 10 June 2019**

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1 Contents

1   Introduction and Context

The SEC Variation Testing Approach Document for SMETS1 Services ('SMETS1 SVTAD') was designated by the Secretary of State on 18 September 2018 and has been included in the Smart Energy Code (SEC) from version 5.22 onwards as Appendix AK. Under the SMETS1 SVTAD, DCC is required to develop and consult on various approach documents including the Migration Testing Approach Document for SMETS1 Services ('MTAD').

On Monday 15 April 2019, DCC issued a consultation on the MTAD (which also covered consequential amendments to the SMETS1 SVTAD) and this document provides DCC's conclusion to that consultation consistent with the relevant SEC requirements.

The MTAD is required under the SMETS1 SVTAD to set out any supplementary rights and obligations involved in migration testing. The purpose of migration testing is to demonstrate that the individual systems and processes of the modified DCC Total system used to migrate SMETS1 Installations[1] can work together and interoperate as required with SMSO and User systems to support the placing of Device Model Combinations (DMCs) on the list of SMETS1 Eligible Product Combinations ('EPCL').

2   Regulatory Requirements

This section details the differing regulatory requirements for production of MTAD and revision of the SMETS1 SVTAD.

The MTAD is produced pursuant to Clause 3.1 to Clause 3.3 of the SMETS1 SVTAD whereas SMETS1 SVTAD is produced pursuant to Section X11.6 of the SEC. These requirements are included in this document for ease of the reader within Figure 1 and Figure 2. DCC has prepared this document in a format that aligns to these requirements. This conclusion document covers all these requirements.

Figure 1 – MTAD Production Requirements

Extract from SEC
3.1   The Testing Approach Documents shall be developed by the DCC. In developing a Testing Approach Document, the DCC shall consult with the Testing Advisory Group of the Panel ("TAG"), Parties and other relevant stakeholders prior to the submission of the document to the Secretary of State.
3.2   The DCC shall submit each draft Testing Approach Document to the Secretary of State, indicating: (a)   why the DCC considers the draft to be fit for purpose; (b)   copies of the consultation responses received; and (c)   any areas of disagreement that arose during the consultation process and that have not been resolved.
3.3   The DCC shall comply with any direction given by the Secretary of State to re-consider, re-consult, and/or re-submit the draft document.

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[1] as described in Appendix AL of the SEC, the SMETS1 Transition and Migration Approach Document 'TMAD'.

Figure 2 – SMETS1 SVTAD Production Requirements

Extract from SEC
X11.6   The DCC shall submit each draft SEC Variation Testing Approach Document to the Secretary of State, indicating: (a)   why the DCC considers the draft to be fit for purpose; (b)   copies of the consultation responses received; and (c)   any areas of disagreement that arose during the consultation process and that have not been resolved, and, the DCC shall comply with any direction given by the Secretary of State to re-consider, re-consult and/or re-submit the draft document.

3   Stakeholder Engagement

This Section details DCC's various stakeholder engagement that has taken place in relation to the development of the MTAD and consequential revisions to the SMETS1 SVTAD.

3.1   MTAD Working Group

The working group inputted to the preparation of MTAD with the purpose of shaping the structure and content of the document to reflect the requirements and perspectives of all stakeholder groups. The MTAD Working Group (MTAD WG) met nine times between November 2018 and April 2019 and key elements of the scope within the MTAD resulted from these discussions. In addition, DCC has presented an overview of the approach to migration testing within the MTAD to the Testing Advisory Group (TAG) on Wednesday 27 March 2019.

3.2   Consultation

On Monday 15 April 2019, DCC published the consultation document titled '*Consultation on the Migration Testing Approach Document for SMETS1 Services (MTAD)*' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The key scope of the consultation was the following areas:

- Migration Testing Approach Document for SMETS1 Services v0.1;

- SEC Variation Testing Approach Document for SMETS1 Services v1.1;

- A draft Secretary of State Direction for approval / re-designation of the documentation; and

- the envisaged decision date for the Secretary of State.

Stakeholders were invited to respond by 16:00 on Tuesday 7 May 2019 in a template format that was attached to the consultation.

During the consultation period DCC held two stakeholder sessions via teleconference on Tuesday 23 April 2019 and Tuesday 30 April 2019 to enable DCC to explain the planned approach to migration testing as captured by the MTAD and revised SMETS1 SVTAD which included a page turn through each document. DCC also held a stakeholder teleconference on Thursday 6 June 2019 to discuss key outcomes from the consultation and obtain stakeholder views.

3.3 Consultation Questions

The **consultation response template** presented 6 specific questions covering the main areas for migration testing as well as an initial 'Q0' for any general comments as presented in Figure 3.

Figure 3 – MTAD Consultation Questions

Number	Question
MTAD Q0	Do you have any general comments on the approach to the Migration Testing.
MTAD Q1	Do you have any general comments on the Test Phase approach to Migration Testing and the provision of Migration DUST as presented in the SMETS1 SVTAD? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the SMETS1 SVTAD and MTAD.
MTAD Q2	Do you have any general comments on the approach / scope to Migration ST? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.
MTAD Q3	Do you have any comments on the approach / scope regarding Migration DMRT? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.
MTAD Q4	Do you have any comments on the approach to Migration DUST? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.
MTAD Q5	To what extent does your firm intend to utilise Migration DUST? Please provide contact details so that the Migration DUST team can contact you to explore your firm's requirements in more detail.
MTAD Q6	Do you agree with the proposed approval/re-designation date of Friday 24 May 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the MTAD and SMETS1 SVTAD using the draft direction at Attachment 1?

3.4 Respondents

The consultation closed on Tuesday 7 May 2019. DCC has received 12 responses to the consultation which provided extensive and comprehensive feedback on the MTAD.

Each respondent's submission was provided to the Secretary of State once received by DCC consistent with the requirements set out in Section 2 of this document.

4 Analysis of Responses

DCC has undertaken a rigorous analysis of the feedback provided by each respondent.

A number of respondents highlighted similar matters in response to different questions (as listed in Sub-section 3.3 of this document). On this basis, the DCC has classified the responses into topic area. Where necessary DCC segmented discursive responses into distinct paragraphs to ensure the key points were duly considered. This disaggregation resulted in 317 distinct responses which were collated into topic areas. Various subject matter experts within DCC have reviewed every distinct response and indicated the appropriate 'DCC reply' also highlighting where the MTAD should be amended or whether some other action is needed (e.g. providing input to those working on the Migration Dust User Guide).

Given the nature of the responses received and DCC's approach to the analysis of the distinct responses, DCC has structured the analysis of responses by topic. Thus, this section presents DCC's analysis by topic in a number of separate subsections; with each structured as:

1. an overview of the responses on the topic; and

2. areas where DCC disagrees with the view presented by Respondents consistent with the requirements set out in Section 2 of this document.

4.1 General Comments

Several respondents provided lengthy general comments. These responses were typically highlighting concerns related to the time taken by DCC to produce the MTAD; the need for further supporting documentary detail; and the alignment with the schedule for DCC undertaking migration testing.

4.1.1 Respondent View

8 of the 12 respondents expressed a range of general concerns:

- some respondents expressed concern that DCC had started migration testing at risk before the MTAD was approved and that TAG engagement on following documents should have concluded prior to migration testing starting:
  - Depth and Breadth of Migration Testing as per Clause 8.3 of the MTAD including supporting documentation; and
  - Regression Testing Approach as per Clause 7 of the MTAD;
- also, some of these respondents suggested that:
  - engagement of the Depth and Breadth of Migration Testing and Regression Testing and Regression Testing should be extended to all interested stakeholders rather than focused on TAG;
  - the documents covering Depth and Breadth of Migration Testing and Regression Testing and Regression Testing should be added to Table 4 set out within Clause 14 of the MTAD; and
  - rather than DCC reaching an agreement with TAG, there should be a formal TAG sign-off process;
- a few respondents expressed a view that the details discussed within the MTAD WG were not adequately captured in the MTAD and that the DCC are not clear on how this detail will be captured / provided to stakeholders; and

- one respondent expressed disappointment that the MTAD only captures the appropriate rights and obligation and doesn't include a discursive narrative to provide further insight into Migration Testing; and

- a few respondents expressed concern that there may be changes to the MTAD for MOC and/or FOC and wished to avoid the situation whereby DCC starts testing for MOC and/or FOC before changes to the documentation are drafted / approved.

Whilst the responses received presented a range of concerns in this area, DCC notes that most respondents also expressed general support for the need for DCC to expedite these matters related to migration testing.

One respondent asked which firm had been appointed as the Migration Auditor. Consistent with the requirements of Clause 12.3 of the MTAD, DCC can confirm that Mason Advisory (www.masonadvisory.com) were appointed as the Migration Auditor for the purposes of Migration Testing.

4.1.2 Areas of Disagreement

DCC notes the range of general concerns raised regarding the timeframe / documentation.

Concerns related to DCC starting testing at risk are noted. As articulated in various stakeholder forums, DCC are working to facilitate the migration, enrolment and adoption of SMETS1 devices as soon as reasonably practicable and therefore, at DCC's own risk have started early preparatory work on the testing of the migration solution. DCC remains focused on expediting the MTAD for approval and SMETS1 SVTAD for re-designation consistent with the overall SMETS1 timeline.

DCC had initial engagement with TAG on the Depth and Breadth of Testing and Regression Testing at the TAG meeting on 25 April 2019 (TAG54) and had further engagement at the subsequent meeting (TAG55) on 29 May 2019. DCC will be issuing a document to TAG to ensure that the requirements with Clause 8.3 and Clause 7 of the MTAD are fully met. In this context, DCC considers engagement focused with TAG on these matters to be appropriate given their role as industry expert group that advises on and assures testing activities planned and undertaken, rather than wider stakeholder engagement. DCC notes that areas of disagreement with TAG (on Depth and Breadth of Migration Testing / Regression Testing Approach) may be referred to the Secretary of State for a final decision. Finally, DCC has amended the MTAD to include a requirement to publish the approach to Regression Testing within the document titled 'Regression Testing Approach' in order to provide greater transparency for all stakeholders.

DCC notes the concern expressed regard the lack of narrative within the text of the MTAD. However, DCC considers that the current drafting style, focused on the rights and obligations, is appropriate as a discursive format to MTAD would give rise to the scope for uncertainty in the interpretation and possibility of disagreement, particularly in relation to exit decisions. However, publication of the key TAG documentation should also mitigate this concern.

DCC considers that the MTAD WG sessions were to shape the structure, objectives and content of the MTAD and the detail discussed fed into the development of the MTAD. DCC considers that the engagement with TAG on the Depth and Breadth of Testing and Regression Testing Approach will provide such further details.

A few respondents expressed concern that there may be changes to the MTAD for MOC and/or FOC and wished to avoid the situation whereby DCC starts testing for MOC and/or

FOC before changes to the documentation are drafted / approved. In order to avoid the need for DCC to proceed with migration testing at risk for future capabilities, DCC intends to release updates to the TMAD and MTAD in tandem, prior to SIT entry for MOC & FOC where necessary, unless there is a material advantage to starting SIT earlier and the risk of re-test as a consequence is low.

4.2 Test Phase Approach (Q1)

The first question related to changes to the SVTAD covering the overall approach to migration testing and provision of Migration DUST, stating 'MTAD *Q1 Do you have any general comments on the Test Phase approach to Migration Testing and the provision of Migration DUST as presented in the SMETS1 SVTAD? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the SMETS1 SVTAD and MTAD*'.

4.2.1 Respondent View

DCC received a response from 10 of the 12 respondents on this matter:

- 4 Respondents explicitly expressed general support for the test phase approach;

- 5 respondents providing a response to this matter didn't reject the test phase approach, providing some detailed comments and queries; and

- 1 Respondent rejected test phase approach suggesting it was too complex / inefficient and rather than the three Migration Test Phases (Active MMT, Dormant MMT and Mixed MMT) there should be a single Test Phase cover a set of testing for the combinations of Active / Dormant and Mixed DMCs.

The following points outline the matters raised by respondents in relation to the Test Phase approach in the MTAD.

- Some respondents queried whether Migration Test Phases would be undertaken in parallel or sequentially.

- A respondent sought clarity regarding device configurations to be used within testing given the drafting within Clause 4.4 of the MTAD provides DCC with flexibility. It is DCC's intention to utilise configurations provided by Installing Suppliers however, Clause 4.4. of the MTAD is drafted to provide for a degree of optionality in order to allow DCC to manage circumstance where several similar configurations are provided by different Installing Suppliers for the same DMC.

- Some respondents asked how Device Model Combinations Testing (DMCT) relates to the MTAD. The consultation document outlined that Migration Testing under the MTAD will not be required for every subsequent DMC to be placed on the EPCL, rather the DCC is introducing DMCT into the regulatory framework via a consultation that is scheduled for issue in the coming weeks. DMCT will provide evidence that a DMC can successfully interface with the DCC's SMETS1 solution as proven via a subset of SRVs being communicated to and from the DMC. Also, DMCT will include a test that each DMC can be migrated into the Modified DCC Total System, using the proven migration solution for each capability release (that was tested under the MTAD regime).

- A few respondents sought detail on how DCC's Live Services Criteria submission to BEIS related to the Test Phase approach. DCC provide information on how the Live Services Criteria will be taken forward include a governance process which will allow a

DMC to be placed on the EPCL initially with a limited quantity of dormant meters to be migrated and with more migrations in due course.

4.2.2 Areas of Disagreement

DCC considers the test phase approach in the MTAD is appropriate as it provides DCC the flexibility to exit with one of more test phases in parallel or in sequence depending on the outcome of testing for each DMC. Furthermore, this is aligned to TMAD approach for EPCL entries. In such circumstances the exit criteria, deliverables and governance can also be applied to multiple concurrent phases together, or individually if a single test phase only is deemed in scope.

DCC confirm that, as set out in the MTAD consultation, where possible it intends to complete these Test Phases in parallel.

4.3 Migration ST (Q2)

The second consultation question sought views on matters related to Migration Solution Testing (Migration ST) stating '*MTAD Q2 Do you have any general comments on the approach / scope to Migration ST? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.*'.

4.3.1 Respondent View

One respondent queried whether with Migration ST would be testing the retrieval of historic data on meters following Migration. DCC confirm that testing will ensure that critical data (billing, consumption, and alert and event logs) is not compromised prior to the completion of Migration Testing.

One respondent asked if Migration ST covered meters operating in pre-payment mode. DCC can confirm that meters operating in pre-payment mode are within the scope of Migration ST as presented to TAG. This respondent also asked if there are any provisions for testing migrations where customers are vulnerable e.g. are on the Priority Services Register. It is important to note that all elements of Migration Testing are on test devices rather than actual SMETS1 Installations. However, the TMAD allows for a priority flag to be set for a SMETS1 Installation by the Responsible Supplier in the MAF. This flag means the SMETS1 Installation are processed first each day; this enables the Responsible Supplier to prioritise migrations of any customers considered vulnerable. This element of the migration regime is within the scope of Migration ST.

Several respondents sought clarity on the Regression Testing (as set out in Clause 7 of the MTAD), with some of these respondents seeking to confirm (i) the difference and scheduling between 'end of cycle' and 'full regression'; and (ii) whether all SRVs/alerts will be tested. End of cycle testing is functional testing of the existing scope which also includes capability regression, SMETS2 Regression and Confidence SR's. Full regression includes remaining Confidence SR's (72 SMETS1 SR's) and compatibility testing against the existing Production code base. End of cycle is run after functional testing has completed. Regression Testing is an automated continuous run across each Test Phase.

There were a number of respondents who expressed concern that the Testing Issue Thresholds approach by Test Phase was could lead to a situation where there testing could complete for a DMC with up to 45 'Severity 3' open issues across Active MMT, Dormant MMT and Mixed MMT. A query was also raised by one respondent to the source of the threshold data in Table 5 of the MTAD; this data was selected to be consistent with Table

13.2 of the SMETS1 SVTAD. These respondents suggested that an aggregate threshold should be introduced for each DMC to apply across Active MMT, Dormant MMT and Mixed MMT – e.g. 30 'Severity 3'. DCC accepts the concern raised, noting that the Testing Issue Thresholds are already aggregated across Service Providers, unlike rest of SMETS1 SVTAD, and does introduce an element additional complexity. However, DCC accepts it would be prudent to amend the MTAD in this regard given respondents' views. Therefore, DCC has amended Clause 15 of the MTAD to count any extant Testing Issue Thresholds in subsequent Test Phase completions as well as aggregate limits consistent with stakeholder views to address the concerns expressed.

One respondent queried whether the application of the DNO certificates to a device would be tested. A respondent also queried whether the regime will be tested to ensure that where a Responsible Supplier has included DNO certificates, that these are valid certificates and for the correct DNO. DCC can confirm that the systems will check if the certificate is valid and also whether it belongs to the relevant Network Operator as per Clauses 5.10.12 and 5.10.17 of the TMAD. This element is within the scope of Migration ST.

One respondent queried whether testing of DCC's Migration Control Centre (MCC) should be within Migration ST.

4.3.2 Areas of Disagreement

DCC considers that the process for the application of the DNO certificates to a device should not fall with the scope of Migration ST but will be captured within DCC's business acceptance testing and thus detailed with the live services criteria. Also, DCC has amended the text within the MTAD to be clear that Migration ST (and Migration DMRT) is focused on the system testing rather than business process testing

DCC considers that the MCC should not fall within the scope of Migration ST. The MCC is an internal DCC function established to manage DCC's rights and obligations under the TMAD. The internal activities of the MCC are not a matter for Migration Testing under the MTAD testing. The MCC is accountable for conforming to TMAD rules in relation to Migration Forecasting, Scheduling and Reporting. The MCC is operationally accountable for managing SMETS1 migrations in respect of daily volumes and the ramp up of DMC volumes in line with minimising operational risk to the total DCC System and to customers.

4.4 Migration DMRT (Q3)

The third question sought views on the approach to Migration Dormant Meter Readiness Testing (Migration DMRT) stating '*MTAD Q3 Do you have any comments on the approach / scope regarding Migration DMRT? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.*'.

4.4.1 Respondent View

DCC received limited responses with regards to Migration DMRT. However, a number of respondents sought further details on the scope of such testing. These points are considered above in Section 4.1 in relation to the document titled 'Depth and Breadth of Migration Testing' and matters related to Regression Testing.

A number of respondents express support for Migration DMRT.

A few respondents sought confirmation on the extent to which DCC will relying on Installing Suppliers to carrying out this testing related to device configuration. DCC has confirmed that

DCC does expect Installing Suppliers to carry out testing of meters following the application of configuration by the SMSO, regardless of whether the instruction to configure was made by DCC or by Installing Suppliers.

4.4.2 Areas of Disagreement

n/a.

4.5 Migration DUST (Q4 & Q5)

The fourth and fifth questions sought views on the approach to the provision of 'Migration DUST' which is a migration related Testing Service provided by the DCC alongside Device and User System Testing and also the extent to which stakeholders plan to utilise Migration DUST, stating '*MTAD Q4 Do you have any comments on the approach to Migration DUST? Please provide a rationale for your views. Also, where appropriate please provide detailed comments on the legal drafting in the MTAD.*' and '*MTAD Q5 To what extent does your firm intend to utilise Migration DUST? Please provide contact details so that the Migration DUST team can contact you to explore your firm's requirements in more detail.*'.

4.5.1 Respondent View

DCC notes that 9 of the 12 respondents indicated that they wish to utilise Migration DUST and DCC will be engaging with these Test Participants in due course.

Several respondents expressed concern that Migration DUST User Guide has yet to be produced as Clause 17 of the MTAD does not provide the relevant details to allow Test Participants with actually engage with Migration DUST. The DCC provided an update on the Migration DUST User Guide to stakeholders via DCC's Service Desk on Friday 10 May 2018. DCC set out the plan to completion of the Migration DUST User Guide based on a three-phase approach as follows:

- Phase 1: Skeleton Guide (20 May 2019 to 30 May 2019)

  - Initial stakeholder engagement (calls on 24 May 2019 and 30 May 2019 to ensure stakeholder participation.)
  - Contents page and description provided
  - Understand questions to be answered

- Phase 2: Draft Guide (10 June 2019 to 28 June 2019)

  - Provide early indication of preparatory activities for Test Participant with potentially long lead times
  - Ensure relevant detail related to the various elements of the service is reviewed by TPs and clarifications made by DCC

- Phase 3: Final Draft (1 July 2019 to 18 July 2019)

  - Testing Participant engagement to allow for detailed preparatory planning activities to be finalised ahead of final document being issued.

In addition, the DCC will be bringing forward a plan for the detailed implementation of Migration DUST in due course.

One respondent queried the drafting in Clause 17.7 of the consultation version of the MTAD to confirm whether it means that only N16 and N55 alerts are available in Migration DUST. DCC can confirm that this isn't the case; these are only the alerts that DCC will help to generate consistent with Clause 8.6 of the Appendix J of the SEC, the Enduring Test Approach Document (ETAD). The relevant Clause in the MTAD was redrafted to improve

clarity. All other alerts will be created per the normal migration regime within the TMAD and SEC.

A few respondents queried why there are no entry criteria for Migration DUST. Whilst Migration DUST is not a Test Phase with a formal entry / exit, DCC has amended Clause 17 of the MTAD to set out the entry criteria it intends to meet prior to commencing the provision of Migration DUST.

4.5.2 Areas of Disagreement

DCC concurs that Clause 17 of the MTAD does not provide the relevant details to allow Test Participants to actually engage with Migration DUST. The intention is for the MTAD to set out the key rights and obligations in relation to Migration DUST building on the general Testing Services provisions the Section H14 of the SEC and the Appendix J of the SEC, the Enduring Test Approach Document. The Migration DUST User Guide will capture the additional detail needed to allow the utilisation of DUST.

Furthermore, the DCC has made a few drafting clarifications to improve comprehension of the Migration DUST provision as set out in Section 5 of this document.

4.6 Secretary of State Approval/Re-designation (Q6)

The sixth question in the covered approval of the MTAD and re-designation of the SMETS1 SVTAD by the Secretary of State, stating '*MTAD Q6 Do you agree with the proposed approval/re-designation date of Friday 24 May 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the MTAD and SMETS1 SVTAD using the draft direction at Attachment 1?*'.

4.6.1 Respondent View

DCC received a response from 10 of the 12 respondents on this matter. 3 of the 10 respondents that express a view objected to the proposed date. 7 of the 10 respondents that expressed a view in support of the proposal for the Secretary of State to approve/re-designate on Friday 24 May 2019 (or within one month thereafter) as follows:

- 4 respondents provided un-conditional support for the proposed date; and

- 3 respondents expressed caveated support for the proposed date.

The following concerns were expressed by respondents in relation to the proposal for the Secretary of State to approve/re-designate:

- a few respondents indicated that they expected DCC to receive extensive responses to the consultation that will require consideration by DCC's SMETS1 programme team and thus subsequent re-consultation prior to approval / re-designation is needed such that the timescale for finally concluding on the MTAD will need to be extended;

- some respondents expressed concern regarding a lack of supporting documentation (e.g. Migration DUST User Guide) and associated testing documents (e.g. SCTAD) and proposed sign-off be delayed until all related documents are available / approved.

- only one respondent stated that DCC's consultation allowed insufficient time to respond;

- one respondent was concerned that queries remained outstanding from the page turning session held with stakeholders.

- one respondent suggested that BEIS should be consulting subsequently on the date for approval/re-designation by the Secretary of State.

None of the respondents that provided a response to Q6 expressed a view on the draft direction text that was provided as Attachment 1 of consultation document (and included as Attachment 1 of this document for completeness). Given the comprehensive nature of the comments received in response to other questions (including general support for the date for approval /re-designation) DCC considers it not unreasonable to conclude that respondents were generally content with the draft direction text.

4.6.2 Areas of Disagreement

Whilst a few respondents objected to the proposed date for the Secretary of State approval/re-designation, DCC considers that it remains prudent to expedite the MTAD for approval and SMETS1 SVTAD for re-designation consistent with the overall SMETS1 timeline.

Some respondents suggested that DCC should re-consultation prior to approval / re-designation given that they expected to receive extensive responses to the consultation that will require consideration by DCC's SMETS1 programme team such that the timescale for approval will need to be extended. Whilst DCC has received extensive comments from some respondents, DCC has carefully considered the comments and has also extended the review time to assess these. Thus, DCC does not believe that views expressed result in fundamental amendments to the MTAD / SMETS1 SVTAD such that further consultation is either necessary or appropriate.

Some respondents expressed concern regarding a lack of supporting documentation (e.g. Migration DUST User Guide) and associated testing documents (e.g. SCTAD and SMETS1 SVTAD changes for DMCT) and proposed sign-off be delayed until all related documents are available / approved. DCC considers that is it appropriate to approve the MTAD and re-designate the SMET1 SVTAD at this point prior to the further documentation being finalised. Clearly, if consequential changes to the MTAD and/or SMETS1 SVTAD are highlighted within the finalisation of the further documentation then DCC will bring forward the required amendments to the regulatory texts.

DCC does not agree with the one respondent that stated that DCC's consultation allowed insufficient time to respond given that DCC has received extensive comments from a range of stakeholders.

One respondent suggested that BEIS should be consulting subsequently on the date for approval/re-designation by the Secretary of State. As set out in the consultation document, DCC is seeking views on the BEIS sign-off date in order to expedite the MTAD approval and SMETS1 SVTAD re-designation. DCC considers that a further period of consultation by BEIS introduces an unnecessary delay within the sign-off process.

5 Summary of Changes to the MTAD

The consultation process has given rise to a number of changes to the MTAD as detailed in this Section. This consultation resulted in no changes to the minor revisions that proposed to the SMETS1 SVTAD.

There are a few minor drafting changes within the legal drafting to amend for typographical errors and incorrect cross-references as well as a few minor changes to ensure the details presented reflect the planned approach to testing. Additionally, an overview of key changes to the MTAD (Figure 4) is set out below for information. Please note that the Clause references in Figure 4 are based on MTAD V1.0 DRAFT.

Figure 4 – Changes to the MTAD

Drafting Change	Description and Rationale for change
Various - 'systems and processes' change to 'systems'	To provide clarity that Migration Testing relates to testing systems testing rather than testing business process. Also providing explicit mention where testing relates to DCC systems and SMSO systems.
SMETS1 SVTAD definition	Definition added to aid clarity following respondent request.
Clause 3.1 (e) – Migration DUST entry criteria	Scope expanded to cover entry criteria for Migration DUST.
Clause 5.2 (e) – GSME and ESME	Combination of Active Meter being ESME or GSME for Mixed MMT added to confirm the scope and improve clarity.
Clause 5.3 (e) and (f) – security keys	Amended to be clear that relevant keys are tested rather than solely EncryptedKey.
Clause 5.4 – report testing	Amended to reflect testing to be based on reports needed for each DMC.
Clause 5.6 – migration outcome testing	Rephrased to improve clarity of scope.
Clause 6.3 (b) – dormant device configuration	Scope of testing extended to include elements related to responses being received by DCC on outcomes of device configuration.
Clause 7.1 (a) – End of cycle testing	Element referencing Migration ST and Migration DMRT removed for clarity as duplicating definitions of Active MMT, Dormant MMT and Mixed MMT. Also, 'regression' removed from end of cycle description to improve clarity.
Clause 7.2 – Combining Regression Testing	Redrafted to be clear that prior performed Regression Testing doesn't cover future Test Phases for different DMCs.
Clause 7.3 – timing of TAG engagement	Clause amended to reflect the timing of DCC's engagement with TAG.
New Clause 7.4 – reporting scope of Regression Testing	Added to provide clarity on how TAG engagement on Regression Testing will be made available within the document titled 'Regression Testing Approach'.

Drafting Change	Description and Rationale for change
New Clause 8.2 (f) – solution readiness	Extra entry criteria added to ensure DCC has confirmed the solution is fit for the Test Phase to start.
New Clause 8.3 – information on the website	Added to confirm that the document titled 'Depth and Breadth of Migration Testing' will be published given respondent request.
Table 3 – Exit Criteria	To improve clarity, exit criteria 2 was expanded into two separate items 2A 'end of cycle' and 2B 'full system regression'. NB error in the title for exit criteria 1 was also corrected.
Clause 15 – open issues carried forward and aggregate limit	Amendment added to include an aggregate limit and carry forward open issues to address concern that testing could complete for a DMC with 45 'Severity 3' open issues across Active MMT, Dormant MMT and Mixed MMT.
Clause 17.4 – remote test labs	Clause restructured to improve clarity given a concern raised by a respondent.
Clause 17.5 – device provision	Amended to reflect DCC approach device provision within Migration DUST.
Clause 17.7 - alerts that DCC helps to generate	Clause restructured to improve clarity and align to ETAD drafting approach given a concern raised by a respondent.
Clause 17.10 – DMCs in scope	Clause redrafted to expand provide clarity on the DMCs in scope for Migration DUST.
New Clause 17.11 & Clause 17.12 – Migration DUST entry criteria	New Clause to set out the entry criteria for Migration DUST.
New Clause 17.14 - Commissioning Requests	In response to a stakeholder query a new Clause to capture the requirements where a Test Participant does not wish for the DCC to be the Commissioning Party within Migration DUST
New Clause 17.17 – device configuration in Migration DUST	In response to a stakeholder query a new Clause to allow testing of devices provided by Testing Participants without configuration changes being applied.
New Clause 17.18 (h) no DNO Cert	Extra file-based exception added within Migration with based on respondent request where the correct DNO cert has not been provided by the Responsible Supplier.

6 Conclusions

DCC is confident that:

- the revised draft MTAD, submitted to the Secretary of State reflects the requirements for document submission that are set out in Clause 3.2 of the SMETS1 SVTAD; and

- the revised draft SMETS1 SVTAD, submitted to the Secretary of State reflects the requirements for revision that are set out in Section X11.6 of the SEC.

DCC has had significant consultation and interaction with industry in the development of the MTAD and revision to the SMETS1 SVTAD. DCC has, where necessary, addressed the comments that have been received from industry and sought additional feedback made by respondents. DCC does not believe that views expressed result in fundamental amendments to the MTAD /SMETS1 SVTAD such that further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and those that have not been resolved in line with the purpose of the documents. Moreover, that it has met its regulatory obligation in this regard.

The MTAD and revised SMETS1 SVTAD are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the MTAD is defined to a sufficient level of detail for approval by the Secretary of State;

- the revised SMETS1 SVTAD is defined to a sufficient level of detail for re-designation into the SEC;

- these documents provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of draft SEC requirements in relation to SMETS1 Services; and

- these documents deliver the regulatory requirements specified in the SEC and the Licence, are materially complete, and the content is technically accurate.

In summary, DCC considers that the MTAD and the SMETS1 SVTAD are fit for purpose.

7 Next Steps

Following the submission of the MTAD and revised SMETS1 SVTAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to approve the MTAD and re-designate the revised SMETS1 SVTAD into the regulatory framework.

8 Attachments

- Attachment 1 – Draft Secretary of State Direction

- Attachment 2 – SEC Variation Testing Approach Document for SMETS1 Services (v1.2)

- Attachment 3 – Migration Testing Approach Document for SMETS1 Services (v1.0 DRAFT)

- Attachment 4 – Migration Testing Approach Document for SMETS1 Services (v1.0 DRAFT) DELTA from v0.1

Attachment 1 - Draft Direction and Designation Text

This attachment contains the draft direction and designation text for approval of the MTAD and re-designation of the SVTAD that was included within the consultation.

Draft Direction and Designation 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.

> a) *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 [DATE], 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.*

> b) *Pursuant to clause 3.4 of the Appendix AK (SEC Variation Testing Approach Document for SMETS1 Services) to the SEC, the Secretary of State hereby directs that the Migration Testing Approach Document for SMETS1 Services is approved 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.