Data Communications Company

Amendment to the SEC Variation Testing Approach Document for SMETS1 Services (DMCT Process).

DCC conclusions and report to Secretary of State

Date:	**23 October 2019**
Classification:	**DCC Public**

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1 Executive Summary

This conclusions document forms DCC's report to the Secretary of State on the proposed changes to the SEC Variation Testing Approach Document for SMETS1 Services (the SMETS1 SVTAD) and the Migration Test Approach Document for SMETS1 Services (MTAD) to support its process for Device Model Combination Testing (DMCT Process). This conclusions document contains a summary of responses received to its consultation and an explanation of how the DCC has taken them into account.

The consultation process also identified small changes to the User Testing Services Approach Document for SMETS1 Services (UTSAD) and DCC is consulting on these as part of this conclusions report.

The SMETS1 SVTAD documents the overarching framework for SMETS1 DMCT testing. It details areas such as data analysis and scheduling for DMCT, DMCT completion, together with the activities and deliverables that are required to undertake this testing.

This document is submitted to the Secretary of State pursuant to Clause 4.2 of the SMETS1 SVTAD (Appendix AK of the SEC). DCC confirms that, in accordance with Clause 4.2 of SEC Appendix AK, it has developed drafts, and consulted appropriately on the revisions to the SMETS1 SVTAD and MTAD, which forms part of the SMETS1 SEC Document set. DCC can further confirm that it has taken into account consultation feedback and has amended the draft SMETS1 SVTAD and MTAD. DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the SMETS1 SVTAD and the MTAD. Subject to the Secretary of State not directing otherwise, DCC plans to modify the SMETS1 SVTAD and re-incorporate it into the SEC as Appendix AK along with modifying the MTAD on 25 October 2019.

In order to provide stakeholders with a complete and meaningful response, DCC is including within this document the conclusions it has reached in respect of the consultation questions on the DMCT Process.

2 Background

The latest version (version 1.2) of the SMETS1 SVTAD was designated by the Secretary of State on 14 June 2019 and has been included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AK. As part of agreeing to designate the SMETS1 SVTAD in September 2018, Department of Business, Energy & Industrial Strategy (BEIS) stipulated in their Designation Letter and response to their consultation on 'Incorporation into the Smart Energy Code (SEC), the SEC Variation Testing Approach Document (SVTAD) for DCC SMETS1 Services'[1], that they expected DCC to propose a further iteration to the SVTAD to make provisions for Device Model Combination (DMC) testing. This testing would be to enable a DMC to be added to the SMETS1 list of Eligible Product Combinations (EPCL) where a DMC has either been de-selected from Systems Integration Testing (SIT) or not-selected for SIT but eligible to be tested. DCC ran a

[1] https://smartenergycodecompany.co.uk/latest-news/sec-variation-testing-approach-document-svtad-smets1/

consultation from 31 July 2019 to 28 August 2019 on our proposals for the Device Model Combination Tests (DMCT) Process and on provisions for this testing in the SMETS1 SVTAD.

This document represents DCC's conclusions in light of the consultation that closed on 28 August 2019. DCC asserts that it has fulfilled the obligations in line with Clause 4.2 of the SMETS1 SVTAD and by consulting with parties as detailed in this report. DCC considers that the further revisions it has made post consultation to the SMETS1 SVTAD and MTAD have provided further clarity to the DMCT process as well as the rights and obligations of the DCC and Parties. We do not consider that these amendments constitute any material change to the SMETS1 SVTAD since the July/ August 2019 consultation that warrant further consultation, apart from in the case of the Exit Criteria for when DMC testing is undertaken as part of the DMCT Process. DCC will consider the responses on this further and develop and consult on our proposals for DMC testing Exit Criteria shortly.

The consultation process also identified small changes to the User Testing Services Approach Document for SMETS1 Services (UTSAD). DCC is consulting on these in Section 8 and Annex H of this conclusions report

3 Document structure

This document comprises of the following sections:

- **Section 1** an executive summary;
- **Section 2** provides a background to this report;
- **Section 3** sets out the structure of this document;
- **Section 4** provides an outline of the consultation process;
- **Section 5** provides an outline of the questions that were asked, together with a summary of the key issues that were raised and DCC's responses to these issues – including where any changes have been made to the SVTAD and MTAD;
- **Section 6** sets out post-consultation changes to SMETS1 SVTAD;
- **Section 7** sets out why DCC considers the SMETS1 SVTAD and the MTAD to be fit for purpose;
- **Section 8** sets out DCC proposed changes to the User Testing Services Approach Document for SMETS1 Services (UTSAD); and
- **Section 9** sets out next steps.

Provided along with this document are the following documents:

- **Annex A** DCC's draft notification for modification of SEC Appendix AK (SEC Variation Testing Approach Document for SMETS1 Services) and the MTAD;
- **Annex B** DCC's draft notification for modification of the UTSAD (for consultation);

- **Annex C** a final draft of the SMETS1 SVTAD (clean version);
- **Annex D** a final draft of the SMETS1 SVTAD (track changed version);
- **Annex E** a final draft of the SMETS1 SVTAD (track changed delta post consultation version);
- **Annex F** a final draft of the SMETS1 MTAD (clean version);
- **Annex G** a final draft of the SMETS1 MTAD (track changed version); and
- **Annex H** consequential changes proposed to be made to the SMETS 1 UTSAD (track changed version).

4 Document development and consultation

DCC has followed the process as set out and is in line with Clause 4.2 of the SMETS1 SVTAD:

- discussed procedures and requirements in forums with industry and other relevant stakeholders;
- consulted with Parties and other relevant persons, the Test Advisory Group of the SEC Panel's (TAG), the Authority, and the Secretary of State on the draft amendments to the SMETS1 SVTAD;
- collated and reviewed consultation feedback;
- addressed consultation responses including providing a summary of the consultation responses received and an explanation of how the DCC has taken them into account; and
- produced amended and assured drafts for submission to the Secretary of State.

4.1 Pre-Consultation Engagement

In order to provide stakeholders with sufficient time to contribute to the development of the DMCT Process:

- We held a Customer Engagement Day on 27 March 2019 and have sought TAG's views on our proposed approach to the DMCT Process and sought initial views on the potential variants to the test packs that will be executed for the DMCT process;
- In addition, we provided progress updates to TAG on the development of DMCT in February, April, and May 2019 - including on DMCT test pack selection and how testing issues would be dealt with in the DMCT Process; and
- Finally, our draft proposals for the DMCT Process were approved by the DCC SMETS1 Design Authority on the 12 June and were presented at the DCC SMETS1 Quarterly Migration Forum on 12 June 2019.

4.2 Formal Consultation Window

We issued a formal consultation on our website on 31 July 2019. Parties were notified of its release by email. The consultation ran for 4 weeks and closed on 28 August 2019.

We asked 3 specific questions on the scope and implementation of the proposals.

During the consultation period we held a briefing on the DMCT Process and underpinning amendments to the regulatory documents (SMETS1 SVTAD and MTAD) to provide Parties with further assistance on what is contained within the legal text and to answer any queries that were raised. The briefing was held on 15 August 2019. The consultation proposals were also presented at the Technical Business Design Group (TBDG) on the 21 August 2019

4.3 Consultation Responses.

We received comments in writing from 7 separate parties which include Distribution Network Operators (DNOs), an Industry Trade Association and Energy Suppliers.

Following the consultation, we reviewed the issues, comments and queries raised and this document sets out our consideration and conclusions.

5 Consultation questions and DCC conclusions

This section sets out the questions asked by DCC in its July 2019 consultation on the DMCT Process and the resulting regulatory amendments to the SMETS1 SVTAD and the MTAD. It summarises and groups responses by theme and sets out DCC's conclusions.

5.1 Question 1

DCC asked consultees: *Do you agree with our proposals for Device Model Combinations Tests? Please state the reasons for your view?*

DCC received responses from 7 parties, all of whom generally supported the proposals, with 6 raising specific issues and concerns on the process they wished to be addressed or have clarified. These are set out by theme below:

Economic Viability

One respondent stated that based on the contents of the consultation, it was their opinion that the DCC has not sufficiently justified its approach to evaluating the different DMCs proposed by Suppliers. They referenced the SMETS1 SVTAD which indicates that economic viability will be considered as part of the evaluation and scheduling of DMCs in the DMCT Process. They noted that the consultation document does not describe or justify the associated "hurdle threshold" whereby a SMETS1 DMC would be excluded from further evaluation by the DCC. In addition, that the consultation does not fully explain other potential evaluation options that could be operated by the DCC although did not suggest any alternatives.

Another respondent voiced concerns that the proposal for DCC to evaluate the economic viability for DMCT entry of each DMC, set out in Clause 20.6(g) of the SMETS1 SVTAD, will be difficult when the DCC does not possess the required economic information. Several respondents raised concerns about the lack of transparency in making the decision regarding economic viability. One

noted that the drafting did not sufficiently detail the factors that will be considered in its economic viability assessment, nor whether consequential impacts to energy consumers, Responsible Suppliers or Meter Asset Providers will be described in the proposal to the Secretary of State. Several respondents stressed the importance of engagement with all affected parties as being essential to ensure an accurate recommendation can be made to BEIS. Several respondents reinforced the potential cost to Energy Suppliers as well as the consumer of getting this recommendation wrong. Some respondents stressed the importance of factoring into assessment criteria the total impact on all energy suppliers from not including them in DMCT. For example, what is a relatively low amount of meter replacements for one Supplier may be relatively high for another. When you add the total amount of DMC's rejected, they may add up to a substantial amount of exchanges for individual parties that have no control over the equipment they have gained via Change of Supplier.

One respondent sought clarification on whether, for example, there should be minimum base levels that enable DCC to indicate there are not enough devices to submit for DMCT hence no migration.

Several respondents were of the view that there is a credible opportunity to further extend the principle of "DMC equivalence", as this may offer a route to maximise the number of small-volume DMCs considered eligible for Enrolment.

DCC conclusions: We acknowledge the concerns expressed regarding economic viability and clarity of the process in the SMETS1 SVTAD. The decision to exclude DMCs on the basis of economic viability can only be taken by the Secretary of State and we understand that this will be an overall assessment taking into account the costs and benefits to all affected parties. DCC's role will be to provide to the Secretary of State the cost of testing a DMC. We have additionally amended Clause 20.7 to require DCC to seek the views of affected stakeholders and include them in any proposal to the Secretary of State that a DMC should be excluded from DMCT on the grounds of economic viability. We understand that this is not a decision that will be taken lightly, and the intention is that as many DMCs as reasonably practicable can be added to the EPCL via the DMCT Process.

We also acknowledge that, for the sake of efficiency and cost savings overall, some DMCs may be proposed to be excluded from testing and added directly onto the EPCL where the operational risk is deemed to be minimal.

Where DCC considers that there is minimal operational risk to use the concept of substantive equivalence for functionally similar meter types, then DCC will endeavour to do so wherever possible. Substantive equivalence may be used to more quickly increase the volume of DMCs eligible for enrolment. For example, where the only difference in a DMC is the PPMID/IHD and that, given their limited functionality, this minor difference does not affect the interoperability of the DMC. DCC wishes to further clarify that the addition of any DMC onto the EPCL will initially go through a series of governance meetings including the SEC Panel and its sub-committees (in particular the Security Sub-Committee, TAG, SEC Operations sub-committee), in addition to DCC's internal governance (TAB, Operational Acceptance including Migration Control Centre approval). Over time, the intention is for the governance oversight to be reduced and therefore capable of taking decisions sooner.

DMCT Testing Capacity

One respondent noted that section 4.3.2 of the consultation document states that "…*the DCC may also look to increase the number of DMCs which can be tested in a tranche*…". Whilst they welcomed the information, they noted that the consultation document does not provide any timescales for the delivery of this increased capacity. Moreover, given that DCC's DMCT capacity is limited compared to the volume of DMCs operating across industry, the constraints preventing the simultaneous testing of significantly more SMETS1 DMCs at the point of DMCT going live needs, in their view, to be explained.

Several respondents welcomed DCC's suggestions around speeding up the testing processes as long as this can be done in way that does not sacrifice quality and robustness of the testing approach and is supported by testing expert groups. However, they went on to state that in their view, even with the streamlined processes that are being proposed now, it is still unlikely that current end of 2020 milestone can be met.

Several respondents welcomed the clarity from DCC on the intent to test a minimum of 6 DMCs in each tranche of DMCT testing. One respondent highlighted their support to the approach DCC set out in the DMCT briefing session. DCC had stated at the session that, in the case of a reduced test pack being selected, where possible, DCC will seek to test more DMCs and the frequency at which new tranches can begin the cycle could potentially be shortened. The respondent noted they would support the approach as long as it does not impact the integrity of the testing and is supported by testing expert groups. Another respondent commented that the 8-week DMCT duration defined, and bandwidth constraints in terms of number of DMCs within a tranche, when extrapolated against the number of DMCs that will need to be submitted to DMCT in order to become eligible for enrolment, poses significant risk to the obligations to enrol SMETS1 meters by the end of 2020. This would particularly be so for Suppliers with large quantities of SMETS1 meters deployed, large quantities of DMCs within their estate, and exacerbated further for FOC Suppliers who will be dependent on DCC completing FOC SIT and MT before any DMCT activities can commence.

Several respondents requested a clear update from DCC and BEIS on the ability for DCC to meet its obligations within the 2020 backstop and how many devices of each capability release are likely to be impacted by any shortfall. The volumes of devices that may not be enrolled within the 2020 backstop need to be understood before the end of 2019 to allow for efficient planning for any replacement programme that allows Suppliers to meet their licence obligations.

One respondent noted the dependency on DMCT will also delay the End to End (E2E) / Device and User System Testing (DUST) testing planned by Suppliers against their DMCs. The respondent questioned whether Middle Operating Capability (MOC)/ Final Operating Capability (FOC) DMCT could be supported in parallel to Initial Operating Capability (IOC) DMCT.

DCC conclusions: DCC will not be in a position to confirm when capacity can be increased until testing commences and at least 2 tranches have been completed. We wish to minimise the operational risk by proving the operational aspects of more than one DMC being tested at a time concurrently in a controlled manner prior to increasing the capacity of each DMCT tranche. The overall process timeframe for each tranche of DMCT is 8 weeks. This includes 2 weeks of prep, 5 weeks of testing (2 migration + 3 functional) and one week for reporting. DMC's that fail or are unable to complete may be added to subsequent tranches. In light of the responses received, we will endeavour to increase the number of DMCs which can be tested in each tranche as soon as

we are confident that the process works as expected. As highlighted at the DMCT briefing session on 15 August, where possible, DCC will seek to test more DMCs and the frequency at which new tranches can begin the cycle could potentially be shortened to less than 8 weeks. The number of tests is one of the limiting factors in the number of DMC which can be tested in a tranche over the 8-week period. If the reduced test pack is selected, then more DMCs can be tested in a tranche as there are fewer tests.

On Thursday 5 September 2019 DCC met with industry and BEIS as part of the engagement on revised SMETS1 plan dates. BEIS stated its intention to review the regulatory framework surrounding SMETS1 Enrolment & Adoption once the plans had been subject to relevant consultation as part of inputting the Joint Industry Plan and BEIS would engage with industry on this area in due course. We acknowledge the concerns expressed by industry in response to our consultation and we have passed these concerns to the Secretary of State by way of inclusion in this report.

The Joint Industry Plan Change Request on DCC's Delivery Plan for SMETS1 Service sets out proposals for a streamlined DMCT governance for subsequent DMCT. Where the DMCs that are being requested for approval on to the EPCL represent similar device models to previous entries and where limited change is seen from prior approvals it will be appropriate that the evidence is provided to SEC parties for information, however a shorter set of reviews is performed between DCC and BEIS against this evidence before the BEIS approval decision. This approach is to be discussed with both SEC Panel and BEIS and proposals communicated to impacted parties.

SMETS1 Test Device Availability & Firmware Upgrades

One respondent noted that the consultation document states that the "*DCC has a requirement for a minimum of six device sets to complete DMCT*", and that further requests for test devices may be made to installing Suppliers or meter manufacturers. Whilst the respondent said that they will clearly look to agree terms to supply additional test assets to support the evaluation of specific DMCs wherever possible, DCC must ensure that it's DMCT processes are operated in a way that minimises the risks of test devices being rendered unusable. The respondent also expressed concerns that the DCC's request for test DMCs that are operating firmware versions *lower* than the planned EPCL entry may pose additional challenges and represent an unnecessary DMCT entry criteria.

The respondent stressed the point that typically, SMETS1 meters are no longer being manufactured and certain hardware variants (e.g. those installed early in the roll-out) or firmware variants may be difficult to source and supply to the DCC. Moreover, that a scenario where the DCC proposes the exclusion of specific DMCs from enrolment owing to difficulties sourcing additional test devices would be challenged robustly. The respondent stated that opportunities exist for DCC to extend its "DMC equivalence" principles outlined in Section 4.2, (of the consultation document) as these could practically reduce DMCT workload while also minimising the demand for SMETS1 test assets. Fundamentally, the respondent believes that DCC must take steps to ensure the maximum number of SMETS1 DMCs are *efficiently* tested or assessed and subsequently enrolled. Doing so will minimise the risk of detriment to energy consumers, Responsible Suppliers and Meter Asset Providers.

One respondent confirmed they will continue to deploy OTA firmware upgrades to their operational SMETS1 Compliant fleets. While they will look to upgrade assets to firmware variants already

evaluated and included on the list of Eligible Product Combination (EPCL) wherever possible, they reserve the right to submit other operational SMETS1 Compliant DMCs for evaluation and testing and expect DCC to take all reasonable steps to evaluate the maximum number of SMETS1 DMCs in an effective and efficient way. They raised concerns about the financial implications to Suppliers if SMETS1 Compliant assets are deemed ineligible for, or excluded from, enrolment to the enduring SMETS1 service.

In addition, the respondent noted that Clause 20.18 of the SMETS1 SVTAD states that "…the DCC shall be relieved of its obligations to complete testing of a DMC pursuant to this Clause 20 should it no longer have sufficient devices available for use in testing…" and stressed that DCC must take all reasonable steps to mitigate against the risk of test devices being rendered unusable through the execution of its DMCT processes and that whilst the respondent will look to supply additional test devices, this cannot be guaranteed owing to limited stocks of hardware and firmware variants. They stressed that the exclusion of a SMETS1 DMC owing to DCC test process failures cannot be deemed to be an appropriate or acceptable outcome.

A number of respondents noted the requirement for a minimum of 6 device sets to be supplied for each DMCT and asked whether the 6 sets are a fixed requirement or an aspiration and that in practice some flexibility would be applied. One respondent asked for confirmation as to the status of the 6 sets, for example 'never used' or 'could have been previously installed' in a test or live environment, or a mix of devices from different Energy Suppliers, who may have the same DMC submission. In addition, one respondent thought that for older DMCs this is likely to be challenging for Suppliers where the only available sets will be previously installed but since decommissioned meters or leftover installation stock. The respondent asked for clarification regarding the obtaining and management of devices and whether or not this will be subject to discussions for each DMCT.

Some respondents noted the request for Suppliers to provide meters with an older firmware than the target DMC. They suggested it further complicates Suppliers ability to provide the necessary devices and strays from accepted testing norms of using a testing firmware hash to test the firmware upgrade process. Parties may not be able to provide devices in this state, although noted there may be a possibility to re-package the existing firmware version but as a later increment e.g. rename V1 to a new V1.1.

One respondent also asked why this requirement exists in DMCT noting that Dormant Meter Readiness Testing (DMRT) / Migration Solution Testing (MST) has no requirement for DCC to firmware upgrade devices to the proposed EPCL entry version and felt that DMCT should not be testing DMCs to a greater extent than in Migration Testing. The respondent suggested that if DCC want to test a firmware upgrade for other reasons, functionally identical images could potentially be provided to support this. Most manufacturers support this so may be an alternative if sourcing devices on lower versions is problematic.

It was remarked that in many DMCs the ESME and GSME and Communications Hub model and firmware will be the same with the IHD variant being the separator between DMCs; and suggested that DCC consider how it can manage provided devices re-using them for some DMCs where still viable, reducing the overall requirement. Respondents agreed that it would be sensible for DCC to document requirements, either in testing documents or guidance notes, that sufficient devices need to be available as a pre-requisite to DMCT execution and the requirements on firmware version.

DCC conclusions: DCC recognises that the availability of assets is an issue and will consider every DMC on a case by case basis. The request for a minimum 6 sets is driven by testing experience and DCC endeavouring to maximise the number of tests that can be run in the DMCT window. 3 sets will be installed on the wall and migrated. 1 further set will be used for continuous integrated regression testing. Additional sets will be requested as contingency based on previous experience. We will endeavour to ensure that any assets provided by Suppliers are not rendered unusable through DMCT and have suggested 6 as a minimum requirement in an attempt to prevent the need to go back to Suppliers for additional devices to complete testing. We have used devices purchased directly from Honeywell for IOC SRV Testing and any devices provided by Suppliers from the point of DMCT commencement onwards will be used for DMCT. DCC needs many more devices particularly old versions of PPMIDs to complete testing of all the DMCs which have been proposed. Where SMETS1 PPMIDs are available, DCC would opt to run a reduced set of tests, which focus on the SMETS1 PPMID only, to provide confidence that these consumer devices can be replaced post migration. DCC are also examining whether, in the case where the only variant between a DMC which has been proposed, to a DMC which has already been tested, is a SMETS1 PPMID, a DMC could be proposed as substantively equivalent. In this instance no Device sets would be required, just sufficient evidence in the form of release notes to prove that this change does not affect the interoperability of a DMC. DCC, however, would need to be confident that adding the DMC to the EPCL without testing poses minimal operational risk. DCC hope to complete DMCT with 3 sets per DMC however 100% contingency has been requested given experience with devices in IOC SIT.

We require the devices to be in good working order, preferably having not been installed in a live environment. However, if devices to this standard are not available, we will need to arrange for devices to be reset by manufacturers. However, this may mean that the DMC will have to be included in a later DMCT Schedule. In almost all cases, devices that fail migration under test can be rolled back to a state compatible with use by the SMSO. Devices that are successfully migrated will subsequently be used for post-migration SRV testing. DCC will engage with Suppliers to more fully understand the device availability options through a number of multi-lateral meetings - the first of which took place on 9 October 2019 - and the RFI process.

We acknowledge the concerns raised regarding lower firmware versions and retract our suggestion for Suppliers to provide DMCs with a firmware version lower than the planned EPCL entry. Following further discussion, DCC recognises this could delay the DMCT process and can be avoided through use of ‘dummy’ FW images as was done for Itron Mixed & Active Migration Testing. DCC’s priority is, first and foremost, to minimise the risk of detriment to energy consumers and to support meeting our obligation in Clause 13.2 of the SMETS1 SVTAD by maximising enrolment capability as soon as possible.

We are aware of the extended time to create firmware images and agree that this would only be done where this is the only option to allow enrolment of the impacted installations, given the potential delay to enrolment caused by mandating this. We would also appreciate guidance from Suppliers pre testing regarding any device specific behaviours which may impact expected behaviours and how these have been resolved by Suppliers in their own testing.

DMC Analysis and Scheduling - Oversight

One respondent asked for further clarification of what is meant by 'DCC plan to only test DMCs in the DMCT once the Operating Capability of which the DMC forms a part has completed SIT or Migration Testing'. They asked whether it meant that the operating capability release (OCR) needs to have completed SIT and Migration Testing (MT) test execution only; or the OCR needs to have completed SIT and MT test execution and the OCR code promoted to the SIT A stream after TAB approval only; or that the OCR needs to have completed SIT and MT test execution, the OCR code promoted to SIT A, and the required formal governance process to exit.

The respondent also questioned why Suppliers would be limited to disputes over substantive equivalence and/or prior testing, stating that if a Supplier has a reasonable case to be heard regarding *any* of the exclusion reasons, there should be a mechanism to allow for this rather than stipulating a framework that specifically prevents this.

One respondent noted that the DMCT framework, as documented does not appear to be particularly collaborative with industry. They noted that in many clauses actually specifies DCC as unilateral decision maker, and specifically excludes suppliers right to appeal in most circumstances. The respondent noted that on DCC's walkthrough call on this consultation content, both DCC and BEIS stated verbally that the intention is for the process to be collaborative, however in its view the intention and the defined framework do not appear to be aligned in that sense.

One respondent, whilst recognising the requirement for the testing of SMETS1 DMCs to be prioritised and scheduled, felt that the model proposed by the DCC does not appear to have any independent oversight over the DMCT Analysis and Scheduling stage. To minimise the risk of the prioritisation being challenged, they recommended that the DCC ensures that its DMCT Schedule is regularly reviewed and signed off by BEIS and a suitable industry forum. They were also of the view that industry representatives on the BEIS-led TBDG forum or SEC TAG could realistically support this DMCT oversight role.

Another respondent welcomed the insights into how DMCT will be scheduled and how much time each phase requires. However, they raised concerns that with the high level of potential DMCs requiring DMCT in the Initial Operating Capability release, combined with an unknown number of DMCs in the Middle Operating Capability and Final Operating Capability releases, DCC may not be able to conclude its obligations to enrol all SMETS1 compliant meters by 31 December 2020. The respondent welcomed the updated draft schedule included in the slides included on the DCC Consultation page and noted that this schedule has a much more rapid transition of eligible DMCs into DMCT than the example in the consultation wrapper resulting in 18 DMCs entering the process in a twelve-week cycle rather than only 12 DMCs. They felt that a more efficient schedule for DMCT combined with the proposed Standard Test pack approach should mitigate some timing concerns, however challenges in sourcing of testing devices and conclusion of the Device Issues Recommendation Forum (DIRF) process for any defects identified are likely to extend DMCT beyond anticipated deadlines.

One respondent asked for further clarification from the DCC regarding the reasoning behind the testing schedule order, i.e. how the priority of testing has been established. Another raised concerns that the frequency of the Request for Information (RFI) proposed may not allow a fixed DMC to be added back to the RFI for DMCT re-scheduling as soon as possible. One respondent

asked that DCC share an early view of which 6 DMCs will enter the first cycle (as there is an 8 weeks cycle per 6 DMCs) and a view of any further devices required at the earliest opportunity. Another respondent asked for a timetable to illustrate the timings of all DMC RFIs and due date, as per SMETS1 SVTAD Clause 20.2, could be provided.

A respondent noted that as per the consultation document and not written in any clauses, when returning the RFIs, Suppliers will have to indicate device availability (minimum 6 sets per DMC). They stated that whilst they understood that DCC will rely on this information to decide whether a DMC could enter DMCT they felt that the onus has been placed onto Suppliers to source the devices and that this does not take into account the devices already provided before the designation of Clause 20 of the SMETS1 SVTAD. The respondent added that there is also lack of indication whether a Supplier will have to have already shipped those devices for DCC to schedule DMCT or will a Supplier simply have to confirm devices availability to be prioritised in DMCT. Moreover, according to this new clause, once a DMCT has been scheduled and DCC runs out of devices the testing would stop. The respondent was concerned that should this happen, this will have a significant impact on the timings and scheduling of the remaining DMC.

DCC conclusion: DCC will produce the DMCT Schedule prioritising DMCs based on the predicted enrolment volumes first and foremost, following confirmation of device availability. This rationale can be included in the DMCT Schedule and any queries can be directed to the DMCT mailbox. This is consistent with DCC's obligation in Clause 20.1 of the SMETS SVTAD to operate the DMCT process in this way and DCC does not have any choice in this matter, consequently an appeal right on such decision-making is considered unnecessary.

The DCC will provide a contact email address on the DMCT Schedule where Suppliers can raise concerns about the DMCT Schedule.

DCC is required to produce the DMCT Schedule in line with Clause 20.10 of the SMETS1 SVTAD and industry oversight is provisioned by the publication of the schedule to which TAG & industry can advise of their opinion. At TAG58 it was agreed that, where appropriate and as a default, DCC will publish on the DCC website. This allows the TAG members to gain a wider understanding of the issues at hand.

The DMCT Process has been designed to be as streamlined as possible given the burden on Suppliers to support DCC in many other areas. In line with Clause 20.6 of the SMETS1 SVTAD, DCC will evaluate whether testing of a DMC is required by taking into consideration the following information on whether the DMC is:

- Already on or proposed to be on the list of Eligible Produce Combinations (EPCL);
- Already planned for testing in DMCT;
- Currently being tested in SIT or PPCT;
- Test devices available in sufficient quantities for executing DMCT.

DCC consider these four considerations to be factual and therefore a decision would not be subject to appeal. DCC will also consider whether the DMC is economically viable to test and the proposals for how this aspect of the process works are set out earlier in this document.

However, given responses to the consultation, Clause 20.20 of the SMETS1 SVTAD now sets out the right to appeal where a Supplier disagrees with the DCC decision where:

- the DMC is substantively equivalent to another DMC on the EPCL; and
- whether it is part of an Operating Capability which is unlikely to complete SIT or Migration testing prior to the production of the next DMCT Schedule.

DCC will consult with TAG on the extent of testing for each DMC, thereby seeking views on the appropriate tests from testing experts and DCC consider this is sufficient engagement.

The intention of Clause 20.6(b) of the SMETS1 SVTAD is that a DMC will not be included in the schedule if it's already currently being tested in SIT or PPCT i.e. a check to confirm no duplication of work, (albeit this is unlikely). The purpose of Clause 20.6(c) of the SMETS1 SVTAD is to clarify that DCC will not include DMCs on the schedule for a capability release where SIT or MST is not complete because we would not be sufficiently confident that changes introduced to the DCC Total System as a result of a new Operating Capability are stable enough to be tested against. If SIT or MST for an OC is close to completion (e.g. 1 month) DCC will include DMCs which are part of that operating capability in the schedule so they can be tested in DMCT as soon as possible following SIT completion. The entry criteria for DMCT start for any capability is dependent on the successful completion of SIT via TAB completion.

DCC plan to publish a schedule as soon as device availability is confirmed for Tranche 1. DCC will ensure the timetable for when RFIs are due from Suppliers is contained in the DMCT Schedule which will be published on the website. We would appreciate the submission of RFIs more frequently than every 2 months and will endeavour to schedule based on the most up to date information.

Suppliers will only have to confirm device availability in order for a DMC to be included in the schedule. This assumes that devices can be delivered in a relatively short timeframe. It must be noted that whilst provision of the devices is essential for testing, so is the information which allows DCC to actually use these devices. Without the information used to load these devices into the SMSO for testing DCC is unable to use them. DCC would like to clarify that we would not be reasonably confident of the planned start date for testing in the case where device availability has not been confirmed rather than where DCC isn't ready for testing to start. We have amended the drafting in Clause 20.11 to reflect this more accurately. We will consider DMCT based on all the information to hand at the time, if devices have already been provided by a Supplier, DCC will factor this into DMCT scheduling.

DCC will include MOC and FOC DMCs in the DMCT Schedule once SIT is close to completion - the DMCT Schedule may be mix of DMCs from all 3 cohorts prioritised by the predicted enrolment volumes.

Testing Issues

With regards to Testing Issues (defect resolution), one respondent asked that DCC documents the statements made on the DMCT Process consultation briefing and at the TBDG Enrolment & Adoption subgroup that the DIRF process will be used in the resolution of any defects identifying during the testing of any DMC in DMCT. Clarity on how Suppliers will be engaged in the process and its timings will be essential for assurance with confirmation that DMCT defects will be treated under the same process as SIT with any contentious issues decided upon by the Secretary of State.

One respondent felt that the consultation and SVTAD drafting do not outline the key governance and remediation processes which will be utilised to efficiently investigate and resolve defects identified during DMCT. They also thought it was vital that these governance and remediation processes are clarified further, given how critical they are to maintain DMCT through-put and ensuring DMCs are efficiently evaluated for subsequent enrolment.

Several respondents asked for clarification on what regression testing is planned as part of the DMCT Process. One respondent asked for clarification on the approach for DMCT to mitigate the risk of testing in the SIT B stream. The respondents also asked for clarification on the level of regression testing planned where issues are identified that result in a change to the DCC Systems and the process behind agreeing and in instances where an issue with the DCC Systems is found and resolved as a result of DMCT. They noted that this must be documented and understood and that the current framework only defines that DCC must test the change but does not consider the impact that change may have on other DMCs under test, or on existing EPCL entries. It was noted in the response that when this point was raised during the DCC consultation walkthrough, the response from DCC / BEIS was that the pending DCC Regression Test Strategy would document this approach, however the draft regression strategy released to TAG for review in August makes little reference to DMCT in order to understand the regression approach in the required level of detail.

One respondent requested more information regarding 'Pre-DMCT' phase, noting that 'Pre-DMCT' has been mentioned many times during industry meetings but that the actual process and levels of Supplier engagement remains unclear. They went on to state that as a Supplier, they would not want to wait until a potential failure being identified in DMCT and instead miss the early opportunity to identify these issues and come up with a fix at the earliest stage. Finally, the respondent asked for clarification on how any resulting SMETS1 Supporting Requirements (S1SR) changes would be handled and the rationale to implement a DCC system change rather than S1SR change.

DCC conclusion: Testing Issues

Device Issue Recommendation process and governance: DCC confirms that that the DIRF process will be used in the resolution of any defects identifying during the testing of any DMC during the DMCT Process.

Regression Testing: DMCs that have entered the DMCT Process and exited successfully without any changes to the DCC solution should not need to be subject to regression testing, consequently we will not run any regression tests for these DMCs which represent the addition of new DMCs to an unchanged DCC solution. Our assessment is that the only impact on regression testing is where one or more DMCs have passed DMCT and are subsequently placed on the EPCL. In such cases those DMCs may themselves become candidates for inclusion in future regression test activity. If solution changes are required as a result of testing issues found, then the approach to testing the delivery of those changes will be managed under the appropriate governance set out in Clause 20.21 onwards of the SMETS1 SVTAD, depending on whether it is the type of change outlined in Clause 20.19 (a) or Clause 20.19 (b).

Pre-DMCT & DMCT Scope: Pre-DMCT has now been renamed to 'IOC SRV testing' as it does not come under the same governance arrangements as DMCT. This is because DCC no longer considered this appropriate given the type of testing that is required, which includes some additional limited testing of the DCC solution to support these 'first of type' IOC meters. Our

approach to IOC SRV Testing is clarified in the IOC Honeywell Elster SRV Testing Depth & Breadth document that went to TAG in October and will be issued to TAG once finalised. A SMETS1 IOC Aclara Migration Depth and Breadth and a SMETS1 IOC Aclara SRV Testing Depth and Breadth will also be issued in due course.

Entry, Exit &Test Completion

Several respondents sought clarification on the entry criteria for the DMCT process and asked where they are defined and whether Clause 20.6(a)-(g) are only considerations or an explicit Entry Criteria into DMCT. They suggested that the clause could easily be interpreted into 'if it's never been in SIT, it will not be tested'.

Respondents also sought clarification on DMCT Exit / success criteria as they do not appear to be defined in either the SVTAD or MTAD and only the consultation wrapper states that 100% of tests must be passed within DMCT. A respondent asked if the test pack contains the Exit criteria.

One respondent felt that Exit criteria regarding the percentage of tests run / passed and required defect threshold should be explicit in the SVTAD. Similarly, another respondent stated their expectation of a requirement for 100% of agreed tests to have been run as per the relevant depth and breadth document to cover DMCT MT; DMCT Service Reference Variant Testing (SRVT); any additive DMCT migration test scope deemed required; 100% of tests passed, and 0 outstanding defects (or exceptions agreed). A respondent also noted that it was not clear from the documentation what exit governance a DMC is required to be submitted to in order to complete DMCT.

One respondent sought clarification on when the 'Test EPCL' will be updated post completion of testing as this is a key dependency for Suppliers to commence their DUST on that DMC.

DCC conclusions: Entry, Exit &Test Completion

Entry & Exit: The entry criteria for DMCT start for any capability is dependent on the successful completion of SIT via TAB completion for at least one DMC for that same capability. Following this, DMCT for that capability can be open. The entry for individual DMC entries into DMCT is controlled via two gates, both of which are controlled through a set of technical and test readiness checks. The first is an entry gate for the preparation stage, at which a number of criteria for entry into test preparation must be met, and the second a test readiness gate, where checks are made to ensure that devices and systems are prepared and ready for test execution. However, DCC considers that formal governance of test entry under the SMETS1 SVTAD is unnecessary.

In light of the consultation responses, we will consider making DMCs available to Suppliers for use in DUST after DMCT MT has completed on a case by case basis. We hope the duration between DMCT MT and DMCT SRVT completion to be less than 4 weeks. It should however be noted that whilst we will consider, the DMCs will not have completed testing and therefore the Suppliers who use it for testing may encounter a defect.

We will certainly make DMCs available for MDUST / DUST once all DMCT testing for that DMC has completed successfully. DMCs will be available for testing, by way of being added to the test EPCL, within 10 working days of the successful TAB for the DMC. However, examples of the actual DMC are unlikely to be available for use in MDUST/DUST unless the Supplier can provide additional device sets. DCC have a limited number of devices and therefore will prioritise the use

of these in SIT and DMCT to maximise the number of DMCs which can be deemed as eligible for migration. Unfortunately, there is currently no method available, to move the Devices from a SIT environment to a UIT environment, however DCC is exploring this option.

We acknowledge the concerns raised regarding the exit criteria for the DMCT Process. DCC will consider further and develop and consult on our proposals for DMCT Exit Criteria shortly.

DMCT Completion: Where testing of a DMC is required, once the exit criteria for test completion have been met (which we shall separately consult upon) DCC shall publish the DMCT Report with a recommendation on why DCC considers that an entry should be made to the EPCL in respect of a particular In-Scope DMC. DCC shall also produce a DMCT Completion report where testing is not required but where DCC considers that the DMC should be added to the EPCL. The report will be published on the DCC website and DCC will notify the Panel, the Secretary of State, the Authority and SEC Parties of the publication of the report.

Once approval is granted by the Secretary of State, the DMC is published on to the EPCL. As DMCT becomes more mature we aim to use the Completion Report for one or more DMCs.

Environments

Several respondents noted that the approach to environment utilisation and release management with regards to DMCT is not clear. They asked where it will be defined and agreed as to which environment DCC plans to run DMCT on. There are several dependencies and risks that would need to be understood and assessed depending on whether DMCT is planned to be run on SIT A or SIT B, or whether it will be on a case by case basis. At a minimum, the code/release management approach to support DMCT across OCRs must be understood and documented, but it is not currently clear where or how this will be delivered. One respondent noted that Clause 20.28(b) of the SMETS1 SVTAD states that DCC must run DMCT on an environment which has the same codebase as planned for Production at the time the DMC is planned to become eligible. This clause is correct and should be retained. However, the respondent pointed out that this would also appear to be misaligned with DCC's current intention, certainly with regards to Honeywell Pre-DMCT testing which is currently occurring on SIT B. If DCC plan to bypass this clause where they believe the risk of testing against a different codebase is negligible, or if they plan to run DMCT partially against a future codebase, with a regression cycle on the Production codebase to mitigate any risk, then this should be explicitly specified in terms of the process and evidence required to support deviance from this clause.

DCC conclusions: The intention is that DMCT will be conducted in SIT-A. SIT-A will contain the codebase most closely reflecting that of Production.

Pre-DMCT for Honeywell IOC devices is being conducted in SIT-B, as the SIT-A DMCT environment is not yet available. The codebase in SIT-B is identical to that in SIT-A except in terms of SMETS2 November19 DSP code currently under test, and a later version of the DCO codebase which will adopt the same route-to-live timetable as that for Pre-DMCT.

With regards to the concerns expressed regarding the use of environments for DMCT, in particular that DCC must run DMCT on an environment which has the same codebase as planned for Production at the time the DMC is planned to become eligible, Clause 20.29(b) of the SMETS1

SVTAD requires this. However, recognising that this approach is not always possible, Clause 20.31 provides for deviations from this approach where it is agreed by TAG.

5.2 Question 2

DCC asked consultees: *Do you agree with our proposed date for modification of the SMETS1 SVTAD and the MTAD?*

DCC received responses from 7 parties, 5 of whom agreed overall with the proposed modification date, 2 agreed with comments.

One respondent stated that the modification date must be determined by the nature of comments that the DCC receives through the consultation process, and the steps required to address these comments.

Another respondent stated that they were generally in agreement with the proposed re-designation date so long as there is no dependency or overlap in scope between the content of this consultation, and the second open consultation on the MTAD and SVTAD regarding SIT and MT alignment which requires a holistic review of responses across both consultations.

DCC conclusions:

DCC can confirm there is no overlap in the scope between the two consultation documents on the SMETS1 SVTAD however we acknowledge and understand the time it takes to respond to consultations. In this case, it was driven by multiple competing deadlines and a wish to not delay consultations on other regulatory documents. We welcome the general approval for the proposed modification date to incorporate out proposals for DMCT into the regulatory framework and agree that the designation date depends on DCC having sufficient time to address comments received, which DCC believes has been the case.

5.3 Question 3

DCC asked consultees: *Do you have any other comments on the proposed changes to the SMETS1 SVTAD or the MTAD? Are you aware of any other issues, relating to DMCT and the SMETS1 SVTAD or MTAD that should be addressed and / or considered? Please state your reasons why.*

DCC received further comments from all 7 parties. Some comments to this question were of a similar nature to those received to question 1 and therefore have been included as part of the summary and response to question 1.

One respondent sought clarification as to whether, in instances where a minor issue is uncovered in DMCT testing that means Suppliers cannot achieve a 100% pass rate, and the impacted firmware Supplier confirms the issue can be resolved in a firmware hotfix, sufficient DMCT approval can be issued to allow a Supplier to enter MDUST. Whether, on receipt of the hotfix, it would be possible to undertake a smaller scale DMCT. Another respondent similarly asked if, it is a ‘first time’ failure, depending on the criticality and issue itself, there is an ability to put in a fix or for a demonstration to be provided to show how it could be fixed, potentially for any minor issues.

One respondent asked whether a singular failure in the firmware would mean it is a complete DMCT fail and would require the impacted device to go back to the start and wait for the next 2-month window. The respondent felt that based on previous experience this was a highly likely scenario when dealing with firmware.

One respondent asked for clarification on whether the objectives include whether the migrated meter would retain the essential pricing information once migrated and whether the criteria of 'Successfully Migrate' includes retaining the existing data post-migration.

Several respondents noted that there were a number of typographical / referencing errors for example that the definitions of Standard Dormant DMCT Migration Test Pack and Standard DMCT Service Reference Variant Test Pack both refer to Clause 20.14 sub-clauses that do not exist in this version of the SVTAD; that Dormant Meter Migration Testing (DMMT) has been deleted from the definitions table whilst Active and Mixed Meter Migration Testing remain in the table so not clear why Dormant has been specifically removed and the introduction of DMCT to the SVTAD / MTAD should not impact the requirement for DCC to run DMMT within Migration Solution Testing and that PPCT is not defined in the SMETS1 SVTAD.

Several respondents reminded DCC that that on several occasions concerns have been raised that TAG is being used as a single point of approval for testing related industry changes. That the TAG is not representative of the whole industry and objects again to DCC continued use of it as a form of industry approval for its actions and testing processes. There are times when TAG is referred to as the body that agreed items on behalf of the wider industry that they may not have actually agreed with but had no regulatory power to enforce. TAG has relevant industry experts to provide advice, but TAG cannot not be a vehicle that circumvents wider industry and it should not be used as an excuse not to engage wider DCC users on testing results and assurance. Many felt that a lot of documentation that TAG reviews that has a `RED' security marking could be shared with wider audience for consultation feedback.

With regards to DMCT SRVT one respondent stated that they would be supportive of the assumption behind this proposed approach. Certainly, for their FOC meters, testing has not uncovered significant any differences in behaviour across the permutations listed which would warrant duplication of testing across these permutations, and therefore this would appear to be a sensible and efficient risk-based approach.

DCC Conclusions:

MDUST & DMCT MT: DCC will regard any testing issue requiring a firmware fix as a DMCT fail. In addition, any firmware change is a DMC change as the firmware version is a component that forms part of the definition of the DMC. In such a scenario, any firmware update will result in the creation of a new DMC, which will need to progress through the DMCT assessment process before being added to the DMCT Schedule. DCC will not consider firmware hotfixes as an appropriate method for the continuation of DMCT tests.

Confirmation of Data Retention during DMCT MT: Data retention is tested for dormant devices – the testing team will place data on the devices, apply configuration and then check the data has been retained. The device will then be migrated and will be checked again. DCC confirms that successful migration includes retainment of existing data pricing, billing and other historical data, unchanged pre and post migration.

Typographical errors / legal drafting: We acknowledge that there were a number of typographical errors in the SMETS1 SVTAD. We have amended the typographical errors and re-included the definition of DMMT. With regards to the definition of pending product combination tests, this is set out in H14 of the Smart Energy Code and SEC Appendix R. In line with standard legal drafting, a definition of PPCT is not required in the SMETS1 SVTAD.

Testing Advisory Group of the Panel: We acknowledge that there is a general overreliance on TAG for approval of such documents. It is hoped that introducing standard document sets will significantly reduce the amount of time required for review, as DCC will present deltas of variances in documents to increase efficiency. TAG is the industry expert body established by the SEC Panel for testing related matters. Therefore, it is DCC's considered opinion that as the industry expert body for testing, TAG is the appropriate body to use when seeking expert opinion on testing matters. TAG's Terms of Reference sets out membership terms and composition of TAG. Members groups within TAG include Large Suppliers, Small Supplier Members, Network Operators, Consumer Member and Other SEC Parties or Interested Parties. Other interested parties may be invited to attend the TAG on an ad-hoc basis at the discretion of the TAG Chair.

6 Post-consultation document changes

In light of consultation responses received, and DCC's conclusions, DCC has made the following key changes to the SMEST1 SVTAD:

- Further clarification on DMCT added to the definition section (Clause 1, SMETS1 SVTAD);
- Clarification on type of DMC to be used for DMCT added (Clause 20.2, SMETS1 SVTAD);
- Change to more accurately reflect the relevant factor to consider when determining the ability to include the DMC in the next DMCT Schedule (Clause 20.6(c), SMETS1 SVTAD);
- Removal of what was Clause 20.6 (e) where DCC could submit evidence of earlier testing of the DMC without having to put a DMC through testing under the DMCT Process. This has been removed as it was designed to support testing of the IOC Honeywell Elster and Aclara DMCs that dropped out of SIT/Migration Testing. However, as set out earlier in this document, DCC now plans to put this testing through a different process which is more suited to the additional solution testing that is required to test these DMCs (Clause 20.6, SMETS 1 SVTAD);
- Amendment regarding discussing DMCs that may be considered not to be economically viable with affected stakeholders incorporated into the drafting. Changed to align with DCC service design which shows that, where the Secretary of State disagrees with the DCC's view, that the DMC goes back into assessment. DCC cannot, necessarily, put the DMC straight into the DMCT Schedule as DCC needs to ensure first that it has suitable devices for testing (SMETS1 SVTAD Clause 20.7);
- Addition of the 'DMCT Status' list to further clarify the requirement on DCC to publish and update the statuses of DMCs in the DMCT Process (Clause 20.8, SMETS1 SVTAD);
- The addition of Supplier appeal grounds (SMETS1 SVTAD Clause 20.12);

- Additional drafting changes to further clarify where DCC recommends a change to the DCC Internal System and sign posting to Sections H8.9 – H8.12 of the SEC which sets out how such changes should be handled (Clause 20.20, SMETS1 SVTAD);

- Additional drafting changes to further clarify DCC's approach to testing changes where DCC recommends a change to the DCC Systems and a change to the Code (Clause 20.21 SMETS1 SVTAD);

- Additional drafting to account for circumstances where there is a need for both a firmware change and a change to the configuration applied to Device(s) that make up part of the DMC (Clause 20.23 SMETS1 SVTAD);

- Further clarification to DMCT Completion report and process. A DMCT Report is required where DCC is proposing the addition of a DMC to the EPCL. Where a DMC that was required to undergo testing has not successfully completed testing, DCC will provide the reasons to any Supplier that included the DMC in their latest DCC submission before or after testing commenced (SMETS1 SVTAD Clause 20.28); and

- Additional drafting to include where DCC proposes to test in an environment that is not the most production like environment at the time DMC(s) are eligible to be Migrated, DCC will seek approval from TAG. (Clause 20.31, SMETS1 SVTAD.)

DCC consulted on a number of changes to the MTAD including amendments to Clause 5.1, 5.4 and 6.6. In light of the consultation, it was decided that these amendments were no longer needed. Therefore, the only change to the MTAD was the additional line added in Clause 4.3, which we consulted on, to provide clarification that DCC may also undertake Migration Testing for any DMCs that are in the DMCT Schedule.

7 Why DCC considers the SVTAD for SMETS1 Services to be fit for purpose

DCC is confident that the revised draft SMETS1 SVTAD and MTAD submitted to the Secretary of State reflects and addresses the relevant comments made by respondents and, where necessary, takes into account the consultation feedback. It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised.

The DMCT Process is in line with the overall solution design for the SMETS1 Services and other relevant documents.

DCC considers that the DMCT Process as set out in the SMETS1 SVTAD, as well as the consequential changes to the MTAD are defined to a sufficient level of detail for designation into the SEC (the SMETS1 SVTAD) and approval under the SMETS1 SVTAD (the MTAD). The process provides an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of SEC requirements in relation to SMETS1 Services.

8 Proposed changes to the UTSAD

As part of the consultation process and analysis of the responses, DCC has identified a number of small changes to the UTSAD. DCC consider these changes to be small in order to align with the amended SMETS1 SVTAD and non-material. These changes are shown in track changes in the UTSAD in Annex H and include:

- DMCT process definition added;
- Clause 4.6 of the UTSAD: Clarification to include the DMCT Process as a route by which a DMC can be made available to test in MDUST and DUST.

DCC is consulting on these proposed changes to the UTSAD.

DCC is proposing to modify the UTSAD using the procedure set out in clause 4.2 of the SMETS1 SVTAD. Following consultation, DCC will provide a summary of responses received and detail on how DCC have addressed any concerns raised. DCC will ensures it builds in sufficient time for BEIS to take a view on the merit of modifying the UTSAD.

DCC expects to issue its conclusions of this consultation, along with any necessary amendments to the UTSAD on or before 6 December 2019. Unless the Secretary of State directs otherwise, DCC proposes to modify the UTSAD through the draft notification at Annex B on 13 December 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter).

Please provide responses on the proposed changes to the UTSAD and our proposed date for modification by 17.00 on 15 November to DCC at consultations@smartdcc.co.uk.

9 Next Steps

DCC submitted the SMETS1 SVTAD and MTAD and this conclusions report to the Secretary of State on 23 October 2019, having kept BEIS regularly briefed on the consultation responses received and the final changes to the drafting since the consultation closed. DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the SMETS1 SVTAD and the MTAD. DCC will publish its conclusions report on the DCC Website and notify SEC Parties. Subject to the Secretary of State not directing otherwise, DCC will issue a notice to modify the SMETS1 SVTAD and re-incorporate it into the SEC as Appendix AK along with modifying the MTAD on 25 October 2019. DCC will notify the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SEC website in due course.

As well as consulting on consequential changes to the UTSAD as part of this conclusions document, DCC will also be issuing a consultation shortly regarding the exit criteria for the DMCT Process.

DCC plan to publish the DMCT Schedule on the DCC website the week commencing 28 October 2019 and will notify parties accordingly, in addition to sharing with SECAS for publication on the SEC website.

Annex A

This annex contains the text that DCC intend to utilise for modification of SEC Appendix AK (SEC Variation Testing Approach Document for SMETS1 Services) and the MTAD. The date for modification of the amended SMETS1 SVTAD and MTAD is subject to the Secretary of State not directing otherwise.

Notification

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 25 October 2019, the SMETS1 SVTAD is designated and incorporated into the SEC as Appendix AK in the form set out in Annex [TBC] of this notification letter, and the MTAD is hereby modified and approved pursuant to the SMETS1 SVTAD in the form set out in Annex [TBC] of this notification.

For the avoidance of doubt such modification of the SMETS1 SVTAD and MTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated or approved, or to the continuing effectiveness of anything done under these documents prior to their modification (which shall have effect as if done under the re-designated documents).

This notification is also being notified to the SEC Administrator.

Annex B

This annex contains the text that DCC intend to utilise for modification of the UTSAD. The date for modification of the amended UTSAD will be subject to the Secretary of State not directing otherwise.

Notification

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 13 December 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter), the UTSAD is hereby modified and approved pursuant to the SMETS1 SVTAD in the form set out in Annex [TBC] of this notification.

For the avoidance of doubt such modification of the UTSAD 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 re-designated document).

This notification is also being notified to the SEC Administrator.