

Alignment of Migration Testing (MT) and Systems Integration Testing (SIT)

DCC Conclusions and Report to Secretary of State on
changes to changes to the SEC Variation Testing
Approach Document for SMETS1 Services (SMETS1
SVTAD) and the Migration Testing Approach Document
for SMETS1 Services (MTAD)

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1 Contents

- 1 Introduction and Context.....3**
- 2 Regulatory Requirements.....3**
- 3 Stakeholder Engagement3**
 - 3.1 MT/SIT Alignment Consultation4
 - 3.2 SMETS1 SVTAD Clause 13 Consultation4
 - 3.3 Consultation Questions4
 - 3.4 Respondents.....5
- 4 Analysis of Responses.....5**
 - 4.1 Removal of Audit Requirement (MT SIT Q1)6
 - 4.1.1 Respondent View6
 - 4.1.2 Areas of Disagreement6
 - 4.2 General Comments on MT/SIT Alignment (MT SIT Q2)7
 - 4.2.1 Respondent View7
 - 4.2.2 Areas of Disagreement8
 - 4.3 Detailed Comments on MT/SIT Alignment (MT SIT Q3)9
 - 4.3.1 Respondent View10
 - 4.3.2 Areas of Disagreement11
 - 4.4 MT/SIT Alignment - Secretary of State Approval/Re-designation (MT SIT Q4) ...11
 - 4.4.1 Respondent View11
 - 4.4.2 Areas of Disagreement11
 - 4.5 Comments changes Clause 13 of the SMETS1 SVTAD (FOC DMC Q2)12
 - 4.5.1 Respondent View12
 - 4.5.2 Areas of Disagreement12
 - 4.6 Clause 13 of the SMETS1 SVTAD - Secretary of State Approval/Re-designation (FOC DMC Q3)12
 - 4.6.1 Respondent View12
 - 4.6.2 Areas of Disagreement12
- 5 Summary of Changes to the MTAD and SMETS1 SVTAD.....12**
- 6 Conclusions.....14**
- 7 Next Steps.....15**
- 8 Attachments15**
 - Attachment 1 - Draft Direction and Designation Text (MT/SIT Alignment)16

1 Introduction and Context

The SEC Variation Testing Approach Document for SMETS1 Services ('SMETS1 SVTAD') has been included in the Smart Energy Code (SEC) from version 5.22 onwards as Appendix AK and the latest version¹ is dated 25 October 2019. 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'). The Secretary of State approved version 1.0 of the MTAD on 14 June 2019 and the latest version² is dated 25 October 2019.

On Friday 9 August 2019, DCC issued a consultation to provide for alignment of:

- Systems Integration Testing (SIT) as described in the SMETS1 SVTAD; and
- Migration Testing (MT) as described in the MTAD.

This alignment was required to support the approach to testing for each meter cohort within MOC and FOC. These changes provide the same Test Phase structure for SIT within the SMETS1 SVTAD as in the current MTAD for MT; there will be three Test Phases (active, dormant, and mixed) for each Device Model Combination (DMC) / Smart Metering Systems Operator (SMSO) combination which is planned to be entered on the Eligible Product Combinations List (EPCL). This will provide DCC with the flexibility to complete testing for each planned entry on the EPCL separately if required (though this is not currently planned for MOC or FOC). DCC also advised stakeholders on some further changes via a briefing teleconference that was held on Thursday 29 August 2019 and the briefing documentation was also made available on the DCC website³.

On Friday 13 September 2019 DCC issued a consultation on DMC selection for FOC testing which included changes to Clause 13 of the SMETS1 SVTAD related to device selection / de-selection. This document also considers responses to these changes to Clause 13 of the SMETS1 SVTAD.

2 Regulatory Requirements

There are differing regulatory requirements for revision to the 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. DCC has prepared this conclusions document in a format that covers all these requirements.

3 Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the updates to the MTAD and revisions to the SMETS1 SVTAD.

¹ The current SEC is available via <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

² The latest version of the MTAD is available via [Migration Testing Approach Document for SMETS1 Services v1.1](#).

³ The slide pack for the stakeholder briefing is available via - https://www.smartdccc.co.uk/media/3333/2019_08_29_smets1_mt_sit_alignment_consultation_briefing-v10-for-website2.pdf.

3.1 MT/SIT Alignment Consultation

On Friday 9 August 2019, DCC published the consultation⁴ document titled '[Alignment of Migration Testing \(MT\) and Systems Integration Testing \(SIT\)](#)' 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 v1.2;
- SEC Variation Testing Approach Document for SMETS1 Services v1.4;
- 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 Friday 6 September 2019 in a template format that was attached to the consultation.

During the consultation period DCC held a stakeholder session via teleconference on Thursday 29 August 2019 to enable DCC to explain the planned approach to the alignment of MT and SIT. During this session, DCC advised stakeholders on some further changes⁵ to the MTAD and SMETS1 SVTAD.

3.2 SMETS1 SVTAD Clause 13 Consultation

On Friday 13 September 2019, DCC published the consultation⁶ document titled '[SMETS1 FOC Device Model Combination Consultation](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

This consultation included changes to device selection / de-selection for FOC testing purposes set out in Clause 13 of the SEC Variation Testing Approach Document for SMETS1 Services v1.4a.

Stakeholders were invited to respond by Friday 4 October 2019.

3.3 Consultation Questions

The [consultation response template](#) presented four questions covering the main areas for the alignment of MT and SIT as presented in Figure 1.

⁴ The consultation documentation is available from <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-consultation-alignment-of-migration-testing-and-system-integration-testing/>.

⁵ The slide pack for the stakeholder briefing is available via - https://www.smartdcc.co.uk/media/3333/2019_08_29_smets1_mt_sit_alignment_consultation_briefing-v10-for-website2.pdf.

⁶ The consultation documentation is available from <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-foc-device-model-combination-consultation/>.

Figure 1 – MT/SIT Alignment Consultation Questions

Number	Question
MT-SIT Q1	Do you have any views on the proposal to remove the audit requirement from the MTAD and the SMETS1 SVTAD? If you consider that the audit requirement should be retained, then please can you detail the benefits you consider this provides.
MT-SIT Q2	Do you have any general comments on changes to the MTAD and SMETS1 SVTAD to support the alignment of MT and SIT for MOC/FOC?
MT-SIT Q3	Do you have any detailed comments on the changes to the legal drafting in SMETS1 SVTAD and MTAD? Please provide a rationale for your views.
MT-SIT Q4	Do you agree with the proposed approval/re-designation date of 4 October 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?

There were two questions covering changes to Clause 13 of the SMETS1 SVTAD in the FOC DMC consultation as presented in Figure 2.

Figure 2 – SMETS1 SVTAD Clause 13 Consultation Questions

Number	Question
FOC DMC Q2	Do you have any details comments on the proposed changes to the legal drafting in Clause 13 of SMETS1 SVTAD? Please provide a rationale for your views.
FOC DMC Q3	Do you agree with the proposed re-designation date of 1 November 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD using the draft direction?

3.4 Respondents

DCC received seven responses to the MT/SIT alignment consultation that closed on Friday 6 September 2019. Also, DCC received five responses to the FOC DMC selection consultation that closed on Friday 4 October 2019. A copy of every submission to both consultations was provided to the Secretary of State once each consultation had closed.

4 Analysis of Responses

DCC has analysed the feedback provided by each respondent. Subject matter experts within DCC have reviewed every response. DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:

-
- an overview of the responses on the topic; and
 - areas where DCC disagrees with the view presented by respondents consistent with the requirements set out in Section 2 of this document.

4.1 Removal of Audit Requirement (MT SIT Q1)

DCC sought views on the proposal to remove the independent audit requirement asking “*MT SIT Q1 Do you have any views on the proposal to remove the audit requirement from the MTAD and the SMETS1 SVTAD? If you consider that the audit requirement should be retained, then please can you detail the benefits you consider this provides.*”.

4.1.1 Respondent View

DCC received a response from all seven respondents on the proposal to remove the requirement for an independent audit:

- three respondents objected to the proposal;
- three of the respondents supported the proposal; and
- one respondent made observations without expressing a view to either support or reject the proposal.

Those respondents that disagreed expressed the view that the audit provided some value and that DCC’s consultation didn’t justify the proposed approach, seeking further justification from DCC. These respondents indicated that there was an on-going requirement for independent oversight regarding DCC’s testing to ensure integrity.

Those respondents that expressed support said that it was important that DCC demonstrated to the Testing Advisory Group of the Panel (TAG) that the appropriate standards are being met regarding the accuracy and completeness of SMETS1 testing. It was also noted that TAG expressed cautious support for the proposal to remove the independent audit requirement from the MTAD and SMETS1 SVTAD. One respondent, who supported the proposal, suggested that the audit provisions should be re-instated with a qualifier saying these only apply for IOC.

Some respondents suggested that in removing the auditor requirement DCC should commit to its own assurance team covering all criteria (including access to testing sites), and to presenting the evidence collected to industry via TAG, to demonstrate those standards are still being met.

4.1.2 Areas of Disagreement

Whilst there were mixed views on the proposal to remove the audit requirement, DCC still considers the independent audit provisions regarding MT and SIT provide limited value which is further diminished by the increasing TAG engagement which is occurring via the introduction of Depth and Breadth documents. In relation to assurance / evidence available, DCC’s reporting related to testing identifies what type of witnessing has been performed by DCC’s resources covering the examination of test results provided by service providers and the physical witnessing of testing by DCC’s test assurance personnel within the test environment.

However, on the basis of the responses, DCC has amended the Clause 19 in the SMETS1 SVTAD and Clause 12 in the MTAD to capture a two part approach:

1. DCC will procure an independent audit for the first test Migration and SIT test phases where the DCC functionality being used in the solution (whether that be migration solution functionality or the enduring solution functionality) has not previously been tested. In practice this means an audit being conducted for Migration and SIT test phases where a DMC emanating from a SMETS1 SMSO is being tested for the first time; and
2. for the second and subsequent test phases that use that same functionality, the activities previously ascribed to the independent auditor are performed by a part of the DCC that is sufficiently independent from those undertaking the testing.

DCC considers that this compromise provides a reasonable balance reducing the burden / cost for additional audits whilst ensuring that assurance continues to be provided to stakeholders. It should also be noted that the requirement for an interim audit opinion for MOC and FOC has not been retained in the SMETS SVTAD. This requirement was originally included to provide assurance that the scope of DCC testing was appropriate. However, this assurance is now provided via the production of depth and breadth documents for each SIT Test Phase, so procuring an interim audit opinion is unnecessary.

4.2 General Comments on MT/SIT Alignment (MT SIT Q2)

DCC sought views on the general approach to the alignment of MT and SIT asking “*MT SIT Q2 Do you have any general comments on changes to the MTAD and SMETS1 SVTAD to support the alignment of MT and SIT for MOC/FOC?*”.

4.2.1 Respondent View

DCC received general comments from all seven respondents on the plans to align MT and SIT:

- none of the respondents explicitly objected to the proposal;
- five of the respondents expressed support for the proposal; and
- two respondents made observations without expressing a view to either support or reject the proposal.

Some respondents expressed concern that the consultation on the alignment of MT and SIT overlapped with the separate consultation⁷ to provide for Device Model Combination Testing (DMCT) within the SMETS1 SVTAD, noting it seemed inefficient and created some confusion regarding the baseline document set.

One respondent expressed concerns regarding the management and availability of DCC test environments.

⁷ The consultation related to Device Model Combination Testing (DMCT) is available on the DCC website via - <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-changes-to-the-sec-variation-test-approach-document-svtad-and-the-mtad-migration-test-approach-document/>

Some respondents expressed concerns related to detailed plans for system regression as they wanted to ensure that no unexpected issues would arise.

One respondent expressed concern that the test phase approach based on planned entry on the EPCL was overly burdensome given the quantity of documents that may be needed to be produced. This respondent also indicated that the SMETS SVTAD and MTAD could be amended to improve the clarity of documentation, a point that DCC accepts and the concluded version of the documents have been amended to address this concern.

One respondent highlighted that the SMETS1 SVTAD does not require DCC to undertake two end of cycle testing runs for SIT. DCC accepts this omission and has amended the SMETS1 SVTAD accordingly.

One respondent requested that that the regulatory framework be amended to mandate that DCC makes Migration DUST available at the same time as Device and User System Tests (DUST) for a capability release, in order to ensure that provision of services to Testing Participants is consistent with the plans for MT / SIT alignment.

Within the consultation process, it has been brought to the attention of DCC that the '2A – End of cycle test run' exit criteria within Table 9.3 of the MTAD does not correctly reflect the approach to counting testing issues for the purposes of determining whether functional testing should successfully complete and is inconsistent with the corresponding exit criteria in Table 13.1 of the SMETS1 SVTAD. DCC will consider further and develop and consult on proposals in the coming weeks.

4.2.2 Areas of Disagreement

DCC considers there is clarity regarding the baseline documentation as this is the version of the SMETS1 SVTAD designated into the SEC and the version of MTAD approved by the Secretary of State. DCC can confirm there is no overlap in the scope between the two consultation documents on the MTAD and SMETS1 SVTAD (e.g. nearly all of the changes for DMCT are captured via the new Clause 20 within 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. DCC concluded on the DMCT consultation⁸ on 23 October 2019 and the documentation provided within this conclusion document is changed marked against those versions.

DCC published the environment plan following the industry consultation in September 2019. DCC is in the process of responding to TAG requests to publish a more detailed UIT plan.

DCC notes the concerns raised by respondents related to the need for system regression. DCC considers that the Depth and Breadth of Regression Testing document prepared pursuant to Clause 7.6 and Clause 7.7 of the SMETS1 SVTAD will allow stakeholders to express their views on the appropriate approach to regression (including how regression is handled for individual test phases). This arrangement also allows for any disagreements on the scope of regression testing to be referred to the Secretary of State by the TAG.

DCC considers that the test phase approach based on planned entry on the EPCL is required to provide maximum flexibility. However, in practice DCC does not consider that this

⁸ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/sec-variation-test-approach-document-svtad-changes-to-incorporate-device-model-combination-testing-dmct/>

approach will be overly burdensome as the regime allows for the various documents to be combined into a single document and DCC plans to do this where it is deemed to be appropriate and efficient.

Accordingly, for MOC and FOC, in addition to Completion Reports, DCC is planning to provide the nine key deliverables to TAG for their approval as per Figure 3.

Figure 3 – Envisaged Depth and Breadth Documents

Document Type	Content Variant
Depth and Breadth of MT	<ul style="list-style-type: none"> ▪ MOC MDS: Dormant, Active and Mixed ▪ MOC Secure: Dormant, Active and Mixed ▪ FOC: Dormant, Active and Mixed
Depth and Breadth of SIT	<ul style="list-style-type: none"> ▪ MOC MDS: Dormant, Active and Mixed ▪ MOC Secure: Dormant, Active and Mixed ▪ FOC: Dormant, Active and Mixed
Depth and Breadth of Regression Testing	<ul style="list-style-type: none"> ▪ MOC MDS: Dormant, Active and Mixed ▪ MOC Secure: Dormant, Active and Mixed ▪ FOC: Dormant, Active and Mixed

DCC does not consider it prudent to amend the regulatory framework to mandate that Migration DUST be made available at the same time as DUST for each capability release. DCC intends for Migration DUST to open at the same time for both MOC and FOC consistent with the delivery plans for those Capability Releases. The arrangements permit Testing Participants to use devices migrated via Migration DUST in DUST. There is nothing in the arrangements that stop Testing Participants testing in DUST / Migration DUST at the same time once the appropriate criteria for enabling DUST and Migration DUST are met. However, mandating that DUST and Migration DUST are made available at the same time (as proposed) would have no impact on the delivery timeframe. DCC’s plan is that once Migration DUST opens, any device request into DUST will be required to be Migrated via the Migration Solution. The only difference will be whether the Testing Participant migrates it through the Testing Participant-facing Migration DUST business process, or whether DCC migrates it on their behalf. The key dependency is uplift of the Migration Solution out of SIT into UIT and the subsequent completion of the Migration DUST preparatory steps to make the service available to Testing Participants in UITA & UITB.

4.3 Detailed Comments on MT/SIT Alignment (MT SIT Q3)

DCC sought views on the detailed legal drafting changes to provide for the alignment of MT and SIT asking “*MT SIT Q3 Do you have any detailed comments on the changes to the legal drafting in SMETS1 SVTAD and MTAD? Please provide a rationale for your views.*”

4.3.1 Respondent View

DCC received detailed comments on the legal drafting within the MTAD and SMETS1 SVTAD from five of the seven respondents. A number of the comments related to minor drafting changes / typographical errors which DCC has addressed.

Some respondents raised the concerns that not all of the cross-referencing had been updated due to the deletion of the audit requirements. DCC accepts that a number of cross-references were corrupted; the cross referencing has been reviewed and amended where appropriate. Also, DCC will reinstate Clause 19 of the SMETS1 SVTAD and Clause 12 of the MTAD as '[Not Used]' as per a respondent's request such that the numbering of the remaining Clauses is not impacted.

Most respondents expressed concern about the proposal to redraft Clause 8.7 of the SMETS1 SVTAD which relates to the testing timetable, arguing that the revised drafting was vague. DCC accepts this concern and will thus revert to the prior drafting.

One respondent thought that the drafting in Clause 7.6 of the SMETS1 SVTAD didn't encourage DCC to actively collaborate on the development of the depth and breadth documents.

A few respondents sought confirmation as to how DCC is going to test High Level Security (HLS) elements within the firmware for FOC as the Installing Supplier is unable to fully test these elements. For FOC, the security features enabled by the firmware changes that deliver HLS are tested within the scope of security testing set out in 'Securing a SMETS1 ESME' in Clause 5.5 (c) of the MTAD which already covers testing the security features related to key rotation. On this basis, the proposed addition in Clause 5.7 of the MTAD has been removed as advised via the briefing on 29 August 2019. Other aspects of HLS firmware testing undertaken by the DCC will be set out in the Migration Testing and SIT Depth and Breadth documents for the FOC DMCs.

One respondent expressed concern that the aggregate Testing Issue Thresholds in Table 13.3 of the SMETS 1 SVTAD relaxed the threshold and thus made it easier for DCC to exit each SIT Test Phase for MOC and FOC. This is not the intention, instead the intention is that both the single threshold for the Test Phase in Table 13.2, plus the aggregate thresholds for the Test Phase in Table 13.3 apply and DCC has amended the drafting in Clause 13.23 of the SMETS1 SVTAD to make this clear.

One respondent highlighted that the drafting of Clause 10.2 of the SMETS1 SVTAD is unclear as the 'environment guide' is not mentioned in Table 10.1 of the SMETS1 SVTAD. DCC accepts that the drafting needs to be aligned in this area. There is a different title for the 'environment guide' document within the SMETS1 SVTAD in the following places:

- (i) Clause 1.3 (definitions);
- (ii) Clause 10.2; and
- (iii) Table 10.1.

DCC will amend the SMETS1 SVTAD to ensure that the title "**User Testing Services Guidance**" is used consistently in all three places as the correct title for the 'environment guide'.

One respondent recognised the potential benefits arising from Clause 4.4 (b) of the MTAD which permits DCC to rely on evidence from materially equivalent prior tests but wished to ensure this was subject to appropriate governance. DCC notes this concern; DCC can confirm that any reliance on prior tests would be clearly articulated to TAG in breadth and depth documents and included within the completion reports.

4.3.2 Areas of Disagreement

DCC considers that the drafting in Clause 7.6 of the SMETS1 SVTAD sets out the formal process where an agreement can't be reached on the depth and breadth documents. Consistent with DCC's broad licence objectives, we will continue to engage with TAG on a positive basis regarding such documents and incorporate feedback from the Industry's Testing Experts. Thus, DCC considers that no changes to the principle approach are needed. DCC will clarify the drafting slightly to confirm this approach.

4.4 MT/SIT Alignment - Secretary of State Approval/Re-designation (MT SIT Q4)

In relation to the alignment of MT and SIT, DCC sought views on the approval of the MTAD and re-designation of the SMETS1 SVTAD asking "*MT SIT Q4 Do you agree with the proposed approval/re-designation date of 4 October 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?*".

4.4.1 Respondent View

DCC received a response from all seven respondents on the proposal for the Secretary of State to approve the MTAD and re-designate the SMETS1 SVTAD:

- one respondent objected to the proposal; and
- six of the respondents supported the proposal.

The respondent that objected suggested that DCC should have a further consultation on the documents given the overlap between the consultations on DMCT and MT/SIT alignment.

Some respondents repeated the same concerns that the consultation on the alignment of MT and SIT overlapped with the separate consultation⁹ to provide for Device Model Combination Testing (DMCT) within the SMETS1 SVTAD, noting it seemed inefficient and created some confusion regarding the baseline document set. Some respondents also sought to understand how version control will be applied between DMCT and the alignment of MT and SIT. DCC recognises such risks and given that DCC has already concluded on the DMCT changes¹⁰ on 23 October 2019, the changes proposed within this conclusion are presented against the DMCT version of the MTAD and SMETS1 SVTAD.

4.4.2 Areas of Disagreement

DCC doesn't consider that a further consultation is necessary given that changes within the overlapping consultations were generally distinct i.e. the consultations on DMCT and MT/SIT

⁹ The consultation related to Device Model Combination Testing (DMCT) is available on the DCC website via - <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-changes-to-the-sec-variation-test-approach-document-svtad-and-the-mtad-migration-test-approach-document/>

¹⁰ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/sec-variation-test-approach-document-svtad-changes-to-incorporate-device-model-combination-testing-dmct/>

alignment generally impact different areas within the MTAD and the SMETS1 SVTAD given that nearly all of the changes for DMCT are captured via a new Clause 20 within the SMETS1 SVTAD. Furthermore, the DMCT consultation has also concluded.

4.5 Comments changes Clause 13 of the SMETS1 SVTAD (FOC DMC Q2)

DCC sought views on the changes to Clause 13 of the SMETS1 SVTAD to support device selection / de-selection for FOC asking *“FOC DMC Q2 Do you have any details comments on the proposed changes to the legal drafting in Clause 13 of SMETS1 SVTAD? Please provide a rationale for your views.”*

4.5.1 Respondent View

Three respondents indicated support for the proposal. One respondent sought clarity on how the DMCT regime would apply for FOC. The DMCT regime is set out in Clause 20 of the SMETS1 SVTAD. DCC is already engaging with potentially impacted energy suppliers for DMCT related to DMCs for IOC and we will adopt the same approach for MOC and FOC.

Two respondents indicated that they had no comments on the proposed changes.

One respondent raised a concern on how DMC de-selection would work for FOC; this respondent was concerned that the new drafting in Clause 13 had an unintended consequence that would prevent a DMC being deselected to an issue with an ESME. DCC agrees with this view and has made a minor amendment to Clause 13 to address this point.

4.5.2 Areas of Disagreement

n/a.

4.6 Clause 13 of the SMETS1 SVTAD - Secretary of State Approval/Re-designation (FOC DMC Q3)

In relation to Clause 13 of the SMETS1 SVTAD, DCC sought views on the approval of the MTAD and re-designation of the SMETS1 SVTAD asking *“FOC DMC Q3 Do you agree with the proposed re-designation date of 1 November 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD using the draft direction?”*.

4.6.1 Respondent View

DCC received a supportive response from five respondents on the proposal for the Secretary of State to re-designate the SMETS1 SVTAD.

4.6.2 Areas of Disagreement

n/a.

5 Summary of Changes to the MTAD and SMETS1 SVTAD

The consultation process has given rise to a number of changes to the MTAD and SMETS1 SVTAD as detailed in this Section.

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 that the

details presented reflect the planned approach to testing. Additionally, an overview of key changes to the MTAD and SMETS1 SVTAD (Figure 4) are set out below for information. Please note that the Clause references in Figure 4 are based on conclusion versions attached to this document i.e. MTAD V1.2 and SMETS1 SVTAD V1.4.

Figure 4 – Changes to the Legal Drafting

Drafting Reference	Description and Rationale for change
MTAD Clause 4.2	Redrafted to provide clarity of approach
MTAD Clause 5.7	Removed as covered by 'Securing a SMETS1 ESME' within Clause 5.5 (c) of the MTAD.
MTAD Clause 6.3 (b) & (c)	Text reduced as detailed content within the depth and breadth documents.
MTAD Clause 7.1 (b)	New text to clarify that two end of cycle runs required for MT.
MTAD Clause 8.2	Preserved IOC drafting separately for clarity.
MTAD Clause 8.3	Allowing combining of the Depth and Breadth of MT document for several test Migration Test Phases.
MTAD Table 9.3	Preserved IOC exit criteria separately for clarity.
MTAD Clause 12	Rather than being deleted, changed to require audit for the first test phase for each SMETS1 SMSO and then prescribe DCC's assurance role thereafter.
SMETS1 SVTAD Clauses 1.3 (definitions), Clause 10.2 & Table 10.1.	Deliverable title amended to the User Testing Services Guidance to be consistent within the SMETS1 SVTAD.
SMETS1 SVTAD Clause 7.4 (c)	New text to clarify that two end of cycle runs required for SIT.
SMETS1 SVTAD Clause 7.6 & 7.7	Amended to be clear each Depth and Breadth of Regression Testing document is prepared on a Test Phase basis aligned to each planned entry of on the EPLC. Also, allowing a Depth and Breadth of Regression Testing document to cover several Test Phases.
SMETS1 SVTAD Clause 8.7	Reverting to prior drafting to align timescales to LC13.

Drafting Reference	Description and Rationale for change
SMETS1 SVTAD Clause 9.7	New text that each Completion Report for a SIT Test Phase shall be accompanied by the SIT Auditor Report.
SMETS1 SVTAD Clause 13	Various amendments to replace Clause 13.11 as per the FOC DMC selection consultation and to allow for deselection.
SMETS1 SVTAD Clause 13.23	Clause amended to improve clarity following a stakeholder comment.
SMETS1 SVTAD Clause 19	Rather than being deleted, changed to require audit for the first test phase for each SMETS1 SMSO and then prescribe DCC's assurance role thereafter.

6 Conclusions

DCC is confident that:

- the updated 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 undertaken significant consultation and interaction with industry in the updating of the MTAD and revision to the SMETS1 SVTAD. DCC has, where necessary, addressed the comments that have been received from industry and where appropriate has sought additional feedback from respondents. DCC does not believe that the 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 identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

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

DCC considers that:

- the updated 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 the SEC requirements in relation to SMETS1 Services; and

- these documents 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 updated MTAD and revised SMETS1 SVTAD to the Secretary of State, DCC anticipates that the Secretary of State will make a decision on whether and when to approve the updated MTAD and re-designate the revised SMETS1 SVTAD into the regulatory framework.

DCC plan to issue a short consultation in the coming weeks regarding proposals around the '2A – End of cycle test run' exit criteria within Table 9.3 of the MTAD.

Furthermore, DCC plans to further review the provisions in the SMETS1 SVTAD and MTAD in relation to the envisaged approach for regression testing and whether there is a need for a regression depth and breadth document regarding the Trilliant DMC(s) which will be the subject of Migration Testing under the MTAD and SRV testing under DMCT (rather than SIT) pursuant to Clause 20 of the SMETS SVTAD. If needed, DCC will consult on further changes to the documentation regarding such regression testing.

8 Attachments

- Attachment 1 – Draft Secretary of State Direction for MT/SIT Alignment

SMETS1 SVTAD

- Attachment 2 – SEC Variation Testing Approach Document for SMETS1 Services v1.4 - clean version
- Attachment 3 – SEC Variation Testing Approach Document for SMETS1 Services v1.4 - DELTA from version v1.3 (current SEC version)
- Attachment 4 – SEC Variation Testing Approach Document for SMETS1 Services v1.4 - DELTA from draft v1.4 (MT/SIT Alignment consultation version)

MTAD

- Attachment 5 – Migration Testing Approach Document for SMETS1 Services v1.2 - clean version
- Attachment 6 – Migration Testing Approach Document for SMETS1 Services v1.2 - DELTA from v1.1 (current approved version)
- Attachment 7 – Migration Testing Approach Document for SMETS1 Services v1.2 - DELTA from draft v1.2 (MT/SIT Alignment consultation version)

Attachment 1 - Draft Direction and Designation Text (MT/SIT Alignment)

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 on the alignment of MT and SIT.

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.