

Data Services Provider

**DCC conclusions on the SEC
Variation Testing Approach
Document for Future DSP**

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1. Introduction and context

1.1. Purpose of this document

1. The purpose of this document is to conclude on the Data Communications Company's (DCC's) recent consultation on the proposed drafting of the Smart Energy Code (SEC) Variation Testing Approach Document (SVTAD) for Future Data Services Provider (DSP) (the 'SVTAD for Future DSP'). Based on stakeholder feedback, DCC is not proposing any amendments to the SVTAD for Future DSP drafting that was consulted upon.

1.2. The DSP Programme

1. The DSP sits right at the heart of the smart metering infrastructure, providing data services that connect Energy Suppliers to devices at their consumers' premises. The DSP Data System is a central facility that controls the flow of messages to and from smart metering equipment, with Service User (SU) organisations (e.g. Energy Suppliers, Network Operators, and Other Users) communicating via these central DSP facilities.
2. The contract for the current DSP solution (referred to in this document as 'As-Is DSP') is set to expire in 2028 and encompasses several different capabilities including but not limited to:
 - a. Provision of gateway services (i.e. network connectivity) to connect SU and Service Providers (SPs) to the DSP in both production and test environments. This will be the first stage of the DSP Programme, however it is not the subject of this SVTAD consultation. This service is currently provided by Gamma. VodafoneThree was selected as the new provider for gateway connections, and the replacement solution is called 'DCC Connect'.
 - b. The DCC User Interface Specification (DUIS) which sets out the structure of the messages that can be exchanged with the DSP. This is not subject to this SVTAD consultation as DCC intend to deliver this in a future DSP release beyond Release 2.
 - c. The Core DSP which provides message routing, anomaly detection, registration services, inventory management, DCC Key Infrastructure (DCCKI – which refers to the cryptographic certificates used within the Public Key Infrastructure (PKI) framework of the DCC), Certification Authority (CA), security checking, logging and reporting, and a Smart Metering Key Infrastructure (SMKI) repository. This is the delivery which is subject to the SVTAD and this consultation.
 - d. A DCC Service Management System (DSMS) which supports DCC's service operation. This is not subject to this consultation.
 - e. A Systems Integrator (SI), which manages key elements such as change and testing to ensure the system functions optimally. This is not subject to this consultation.
3. DCC recently completed a Full Business Case (FBC) for a new DSP contract to procure a solution for the capabilities within the existing contract. This excludes the DSMS capability which is in the process of being disaggregated with a replacement service being delivered under DCC's Future Service Management (FSM) Programme. FSM is a separate programme to DSP, and the delivery plan for FSM has been consulted on separately. There is no requirement for FSM to be delivered before DCC Connect.
4. New contracts were signed with partner organisations in April 2025. A disaggregated approach is being adopted with different partner organisations providing different capabilities. The DSP Programme will encompass the implementation of these new capabilities. This includes both the migration of SUs and SPs to the new solution as well as the migration of devices from the current DSP to the new DSP.

5. On 26 June 2025, DCC was directed to produce an updated delivery plan for the DSP Programme and published its consultation on this on 22 August 2025.¹ This consultation closed at 17:00 on 3 October 2025. DCC has since published a report to the Department of Energy Security and Net Zero (DESNZ, referred to as 'the Department') containing its consideration of the responses and its conclusions on its proposed updated plan.² On 16 January 2026, the Department approved DCC's updated delivery plan for the DSP Programme.

1.3. Direction to produce the SVTAD

6. On 3 October 2025, in accordance with SEC Section X11.4, the Secretary of State directed DCC to develop a draft SEC Variation Testing Approach Document (SVTAD) for the variations to the SEC being considered to enable the introduction of the DSP Programme (the 'SVTAD for Future DSP').
7. The general requirements for the contents and development of an SVTAD are set out in SEC Section X11. These include testing objectives, the testing to be undertaken, and the environments to be used.
8. The Direction received from the Secretary of State requires that the Future DSP SVTAD should provide for the detailed test approach that will apply to enable DCC to introduce and transition to the Future DSP arrangements and for this to be set out in associated documents to be developed by DCC. The relevant variations are those that are required to give effect to the implementation of the draft delivery plan published for consultation by DCC on 22 August 2025, except those that are required for the implementation of DCC Connect Gateway Connections. The Direction also sets out that the SVTAD should provide for DCC to revise these documents in accordance with any request made by the Secretary of State and provide for where these documents need to be submitted to the Testing Advisory Group (TAG) for approval (with any disagreement being submitted to the Secretary of State for final determination).
9. In accordance with SEC Section X11.6, any SVTAD developed by DCC needs to be submitted to the Secretary of State following consultation with SEC Parties and the TAG. DCC has been directed to complete this by 31 January 2026.

1.4. Consultation responses and next steps

2. This consultation, issued in November 2025, sought views on:
 - The proposed drafting for the SVTAD for Future DSP. The views received and DCC's responses are covered in section 2.1 of this document.
 - The proposed designation date for incorporating the SVTAD for Future DSP into the SEC. The views received and DCC's responses are covered in section 2.2 of this document.
3. Based on stakeholder feedback, DCC is not proposing any amendments to the SVTAD for Future DSP drafting that was consulted upon.
4. DCC will submit its conclusions to the Secretary of State on 31 January 2026. Subject to the Department for Energy Security & Net Zero's (DESNZ) (the Department) approval, the SVTAD for Future DSP is due to be incorporated into the SEC on 13 February 2026 (or within one month thereafter).

¹ [DSP consultation on the revised delivery plan | Smart DCC](#)

² [DSP DCC conclusions on the revised delivery plan | Smart DCC](#)

2. Analysis of responses

5. DCC received two written responses to this consultation: one from the SEC Panel and one from a Large Supplier.
6. DCC has analysed the feedback provided. This section sets out an overview of the responses received to this consultation and DCC's response.

2.1. Question 1

7. DCC sought views on the proposed drafting of the SVTAD for Future DSP.

Q1

Do you agree with the proposed SVTAD for the Future DSP Programme? Please indicate any areas of disagreement and your rationale for this.

Respondent views

8. One respondent agreed with the proposed drafting of the SVTAD for Future DSP.
9. One respondent recommended that the TAG formally review the User Integration Testing (UIT) issues raised by DCC Users. They suggested that this should occur following the completion of the User Testing window, but before any decisions regarding Live Service Criteria (LSC) are made. They added that this review should serve as a checkpoint to ensure that all material issues identified during UIT are fully considered and addressed before progressing to live operations, removing the obstacle where reviews occur too late to influence LSC decisions. Finally, they noted that this mechanism should apply regardless of whether or not User Testing is mandated for individual Parties, as it provides an additional layer of transparency and confidence for all stakeholders.

DCC response

10. DCC agrees that all material issues identified during UIT should be considered before progressing to live operations. Testing Issues raised during UIT will be provided by DCC to the TAG for review during the UIT window and DCC will continue to provide the TAG with visibility of any Testing Issues up to go-live decisions being taken. The go-live decision-making framework is outside the scope of the SVTAD. The LSC will be outlined by the Department and the process for SEC governance bodies to support the LSC decisions will be outlined in the LSC.

2.2. Question 2

11. DCC sought views on the proposed designation date for incorporating the SVTAD for Future DSP into the SEC.

Q2

Do you agree with the proposed designation date for the SVTAD of 13 February 2026 or within one month thereafter? Please provide your rationale for your response.

Respondent views

12. Both respondents agreed with the proposed designation date of 13 February 2026.

3. Summary of drafting changes

13. After reviewing the responses received, DCC is not proposing any changes be made to the version of the SVTAD for Future DSP that was consulted upon. This version can be found in Attachment 1 to this document.

4. Next steps

14. DCC is of the view that it has had appropriate engagement and consultation with industry on the proposed drafting for the SVTAD for Future DSP. As the responses to the consultation and engagement in industry were supportive of the proposed drafting, DCC will submit this to the Department for incorporation into the SEC.
15. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the SVTAD for Future DSP drafting and, as such, further consultation is neither necessary nor appropriate.
16. In summary, DCC considers that the SVTAD for Future DSP is fit for purpose.

5. Attachments

- Attachment 1: Proposed SVTAD for Future DSP