



Issued: 29 April 2025

Respond by: 17:00 on 30 May 2025 Contact: <a href="mailto:consultations@smartdcc.co.uk">consultations@smartdcc.co.uk</a>

**Classification: DCC Public** 

## **Table of Contents**

<b>1</b> .	Background and context	3		
	1.1. The FSM Programme	3		
	1.2. Direction to produce an updated LC13B plan for the FSM Programr	ne. 4		
	1.3. Scope and structure of this consultation	5		
2.	Updated LC13B plan for the FSM Programme	5		
	2.1. Amendments to existing Milestones	5		
	2.1.1. 'Go-Live' Milestone			
	2.1.2. 'Confirmation of Regulatory Changes' Milestone			
	2.2. Addition of new Milestones			
	2.2.1. Testing Milestones			
	2.2.2. LSC Milestones			
	2.3. Customer journey and key engagement milestones	О		
3.	Re-designation date of the enduring SEC changes	9		
4.	Next steps	9		
5.	Consultation questions and how to respond9			
6.	Attachments10			
<b>А</b> р	endix A – FSM delivery plan Milestones	11		
Аp	endix B – Draft direction text for the enduring changes	12		

## 1. Background and context

- 1. This consultation sets out and seeks your views on the revised plan for the delivery of the Future Service Management (FSM) Programme. It also sets out a revised designation date for the enduring regulatory changes required to deliver the FSM solution and seeks your views on this.
- 2. We are seeking your responses to the questions set out in this consultation by **17:00 on Friday 30** May 2025.

### 1.1. The FSM Programme

- 3. The DCC Service Management System (DSMS) is a critical part of DCC's infrastructure, used to track and resolve issues across the smart metering network. Customers use DSMS to request DCC services, raise incidents, and access reporting and diagnostics information. This system handles a high volume of activity, with around 25,000 separate requests or incidents raised through it each month. The current DSMS service is supported under the existing Data Service Provider (DSP) contract. However, the tool on which the DSMS is currently built is now coming to the end of its life and a new solution is required to mitigate service and security risks to the smart meter network.
- 4. The FSM Programme was initiated in June 2023 to competitively procure and implement a replacement tool ahead of the new DSP service commencing in 2028. The scope of this programme is to:
  - Replace the existing scope of DSMS including the Self Service Interface (SSI) and the Self Service Management Interface (SSMI);
  - Replace the underlying Service Management tool which is used by the DCC Service Desk; and
  - Incorporate Order Management System (OMS) capabilities, including the ordering of 4G Communications Hubs (CHs) and the returns of all Smart Metering Equipment Technical Specifications 2+ (SMETS2+) CHs.
- 5. The current DSMS service is built upon a BMC Remedy platform, which is an IT Service Management tool. The support contract for Remedy is due to expire in October 2025 and DCC has procured and is implementing a new platform as a replacement for the existing DSMS. After it was recommended by all bidders during the procurement exercise, DCC has selected ServiceNow as the platform to be used for FSM. ServiceNow is a flexible cloud-based 'software as a service' tool offering several Service Management aspects either 'out-of-the-box' or via configuration or customisation.
- 6. DCC has concluded to include the OMS functionality for 4G CHs within scope of the FSM Programme, leveraging the same ServiceNow solution as for Service Management. The 4G OMS will therefore be delivered through the replacement tool at the same time, replacing the existing solution. Any future technologies would also be incorporated into the ServiceNow solution in the same way. DCC has also concluded to include the functionality to return all SMETS2+ CHs within the scope of the programme. Please note that the existing OMS solutions for ordering 2G/3G and long-range radio (LRR) CHs will not be replaced within this programme. Each will instead be retired independently in the future as they reach their final dates for ordering the respective products.
- 7. In addition to replacing the tool, DCC is intending to retire the use of User Interface (UI) DCC Key Infrastructure (DCCKI) personnel certificates to access the DSMS and replace them with multifactor authentication (MFA). MFA is a widely used and trusted approach to authenticating the

DCC Public: FSM consultation on the revised delivery plan (Apr 2025)

<sup>&</sup>lt;sup>1</sup> The DSP and other services delivered under the data services contract sit right at the heart of the smart metering infrastructure.by providing data services that connect DCC Users (such as Energy Suppliers, Network Operators and Other Users) to Devices at their consumers' premises.

- person logging in to a site by requiring them to provide two or more pieces of evidence (for example entering a password, using a security token or authenticator device, or using biometrics).
- 8. Finally, DCC is developing a simplified process to allow a user to attach an Anomaly Detection Threshold (ADT) file directly within a service request and utilise a workflow to process it. This would remove the current manual process using SharePoint. This process also relates to Quarantine Command Action files and could also be extended to other file upload requests. This will reduce or remove some manual steps and result in an improved user experience.

### 1.2. Direction to produce an updated LC13B plan for the FSM Programme

- 9. On 9 November 2023, DCC consulted on its current plan to ensure continuity in the provision of data services with respect to Smart Metering Systems.<sup>2</sup> This was carried out following a direction issued by the Secretary of State on 24 July 2023 under Condition 13B of the Smart Meter Communications Licence (LC13B). DCC submitted its plan to the Department for Energy Security & Net Zero (DESNZ) (the Department) on 30 January 2024,<sup>3</sup> and this was subsequently approved by the Secretary of State on 9 February 2024.
- 10. The plan submitted by DCC in January 2024 included milestones for the procurement and delivery of a new DSP and a DSP Systems Integrator and for the delivery of the FSM arrangements.<sup>4</sup> At the time this plan was approved, DCC was still undertaking the procurement of the FSM capability. As such, it was unable to include the key delivery milestones leading up to FSM Go-Live. This procurement has now been completed and DCC is in the process of developing and delivering this capability.
- 11. Now that the procurement has concluded, the Department considers that DCC should be able to provide the clarity on the key delivery milestones for the FSM Programme. Consequently, it issued a further direction to DCC under LC13B on 18 December 2024 directing DCC to produce a new plan for the delivery of the FSM arrangements only. This plan should include delivery milestones for any DCC activities that may impact on or require input from Smart Energy Code (SEC) Parties or the industry. As a minimum, this plan should include System Integration Testing (SIT) and User Integration Testing (UIT) exit dates and the dates for the DCC's submission and the Department's decision on the Live Service Criteria (LSC).
- 12. DCC has been directed to submit its new plan to the Department following appropriate consultation with SEC Parties and the SEC Panel. DCC was originally directed to submit its plan by 25 April 2025. However, DCC needed longer to complete its new plan than originally anticipated, which has delayed it issuing this consultation. DCC has discussed this delay with the Department and has agreed a revised submission deadline of 4 July 2025.
- 13. Separately to this, DCC issued its consultation on the transitional and enduring regulatory changes required to support the delivery of the FSM solution in January 2025.<sup>5</sup> As part of this, DCC consulted on its proposed designation date for the enduring changes of 25 October 2025, in line with the planned Go-Live date for the FSM solution at that time. Since that consultation was issued, DCC has undertaken a replan of its delivery plan for the FSM solution, which resulted in a delay to the planned Go-Live date until March 2026 (see section 2.1.1 of this document for details). The enduring SEC changes need to be designated on the Go-Live date, and so the designation date for these will need to be aligned to the revised date.

<sup>&</sup>lt;sup>2</sup> Consultation on the Revised Delivery Plan for Continuation of Data Services (DSP) | Smart DCC

<sup>&</sup>lt;sup>3</sup> Conclusions on the Revised Delivery Plan for Continuation of Data Services (DSP) | Smart DCC

<sup>&</sup>lt;sup>4</sup> The FSM arrangements are defined as (a) a new service management and incident management system, (b) a new 4G CHs forecasting and ordering management system and (c) a system to support the returns process for all CHs.

<sup>&</sup>lt;sup>5</sup> FSM consultation on the transitional and enduring regulatory changes | Smart DCC

### 1.3. Scope and structure of this consultation

- 14. This consultation seeks your views on the proposed updated delivery plan for the remainder of the FSM Programme. This includes an update to the dates of the existing 'Confirmation of Regulatory Change' and 'Go-Live' Milestones and the addition of eight new Milestones relating to testing and to the LSC decision. You can find the details in section 2 of this document.
- 15. This consultation also seeks your views on the proposed revised designation date for the enduring SEC changes. You can find the details in section 3 of this document.
- 16. This consultation is expected to be of interest to all SEC Parties that use the DSMS or that use the OMS to order 4G CHs or return SMETS2+ CHs.
- 17. This consultation will close at **17:00 on Friday 30 May 2025**. Following this, DCC will provide a report to the Department by 4 July 2025 containing its consideration of the responses and its conclusions on its proposed updated plan. We will publish this conclusions document on the DCC website.

## 2. Updated LC13B plan for the FSM Programme

- 18. DCC has reviewed the delivery plan for the remainder of the FSM Programme. We have reviewed the dates for the existing Milestones and determined the dates for the additional Milestones listed in the Department's Direction. Our proposed dates and rationale are set out in this section, and a summary of the proposed Milestones is available in Appendix A of this document.
- 19. The plan set out in this document focuses on the activities that will take place on or after the expected submission date of this plan to the Department.

### 2.1. Amendments to existing Milestones

20. The current plan contains two Milestones, one for the 'Confirmation of Regulatory Changes' and one for 'Go-Live'. The dates for both will be amended as part of this replan.

#### 2.1.1. 'Go-Live' Milestone

- 21. DCC's original plan had envisaged a Go-Live date for the FSM Programme of 25 October. The plan carried risk, but all parties reported it was achievable.
- 22. DCC has since conducted a portfolio level analysis of the October 2025 Go-Live window following changes to both the Market-wide Half-Hourly Settlement (MHHS) and Dual Control Organisation (DCO) programmes. DCC concluded that it would struggle to absorb the level of change required in this single month and doing so would add further risk to the plan. SEC Parties indicated they did not share DCC's concerns for their own ability to absorb the level of change.
- 23. During this process DCC also experienced connectivity challenges and delays with the build sprints during the 'Build' stage of the FSM Programme that led to a delay in SIT Entry. DCC initially believed these were delays which could be managed. However, its Service Provider later indicated that, while the connectivity issue had been resolved, it had lost confidence in its ability to deliver to the October 2025 Go-Live date. These factors have driven the replan set out in this consultation.
- 24. DCC's revised Go-Live date is **21 March 2026**. This represents the earliest opportunity to deliver the FSM solution whilst avoiding the winter change period (where DCC aims to avoid implementing any major changes during the winter months). This is also the latest opportunity where the FSM solution can be delivered before the change freeze around the April 2026 price change event begins. The migration of all SSI User data and 4G CH orders to the new platform will also be completed at the time of Go-Live.

25. As a result of the revised FSM Go-Live date, DCC will be extending the support contract for the existing Remedy service to cover the interim period.

#### 2.1.2. 'Confirmation of Regulatory Changes' Milestone

- 26. The 'Confirmation of Regulatory Change' Milestone is currently set for 30 March 2025. However, DCC required additional time to develop the regulatory changes for the FSM solution prior to consultation due to this being dependent on the detailed design of the solution.
- 27. DCC commenced its drafting of the proposed changes in early September 2024. The breadth of changes was greater than originally anticipated and necessitated additional drafting and legal reviews prior to consultation publication. DCC issued its consultation on the regulatory changes for the FSM Programme on 23 January 2025, and this closed on 6 March 2025.
- 28. We are proposing that the date of this Milestone is revised to **2 May 2025**. The corresponding Joint Industry Plan (JIP) Milestone has already been re-baselined to this new date by the Department's Implementation Managers' Forum (IMF) and Smart Metering Delivery Group (SMDG), and we are proposing to align this date within the LC13B plan for completeness. DCC has completed its consultation on the proposed regulatory changes and published its conclusions on this on 25 April 2025 following its review of the responses received.<sup>6</sup>
- 29. As the main body SEC changes being consulted on are consequential changes only, the Department considers these can be delivered under the provisions of Licence Condition 22.30 and SEC Section X5.6, rather than needing to be enacted by the Secretary of State using the powers conferred under Section 88 of the Energy Act 2008. This means that subsequent time for the changes to be laid in front of Parliament for 40 sitting days prior to designation by the Secretary of State, which had been factored into the original timeline, is not required. The transitional changes contained in SEC Appendix AU 'Network Evolution Migration & Transition Approach Document' (NETMAD) do not need to be live until six weeks prior to the start of UIT. As such, DCC considered that the proposed revised date of 2 May 2025 for the 'Confirmation of Regulatory Change' Milestone to be suitable and would not affect the wider delivery of this programme.

#### 2.2. Addition of new Milestones

30. The current plan does not contain any Milestones related to testing or to the LSC decision. The dates for these activities have now been set out as part of this replan.

#### 2.2.1. Testing Milestones

- 31. Testing continues to form a core part of the delivery plan, and it is vital that the testing undertaken is of a high standard and of the appropriate depth and breadth, commensurate with the significance of the programme's objectives.
- 32. The framework for testing will follow DCC's standard testing approach, which has developed over time through learning from experiences from several testing cycles across different delivery programmes. DCC consulted upon the proposed FSM SEC Variation Testing Approach Document (SVTAD) in October 2024<sup>7</sup>. Its conclusions were published in December 2024, and the FSM SVTAD was incorporated into the SEC by the Department on 20 December 2024. As set out in that consultation, DCC will be using its standard testing approach which consists of three key lifecycle phases:
  - Pre-Integration Testing (PIT) encompasses functional and non-functional system testing.

<sup>&</sup>lt;sup>6</sup> FSM conclusions on the transitional and enduring regulatory changes | Smart DCC

<sup>&</sup>lt;sup>7</sup> FSM consultation on the SEC Variation Testing Approach Document | Smart DCC

<sup>&</sup>lt;sup>8</sup> FSM Conclusions on the SEC Variation Testing Approach Document | Smart DCC

- System Integration Testing (SIT) tests the new code in an integrated environment as a whole system that includes other components within that environment with the purpose to ensure integration.
- User Integration Testing (UIT) allows DCC Users to undertake testing to verify the integration of the DCC Total System with their own systems and processes.
- 33. DCC is planning to deliver the FSM changes through a single release, and so there will be a single SIT phase covering all the changes. DCC is planning to commence SIT for the FSM Programme on 4 August 2025, with this phase concluding by 17 October 2025.
- 34. Consistent with previous programmes, DCC will be undertaking User testing in both the 'B' and 'A' environments. To treat all Test Participants equitably, DCC is proposing to open a UIT window in both environments concurrently to give each Test Participant an opportunity to test. DCC is also proposing to mandate Users to undertake relevant testing before they can access the new platform and recognises that not all Users will have access to the UIT-B environment. It is therefore planning to open the two UIT environments together to give customers the maximum amount of time to test before the new platform goes live in the Production environment. As such, the UIT-B and UIT-A environments will both be open from 1 December 2025 until 23 January 2026, spanning a period of eight weeks. This allows for six weeks of testing with a two-week break over the Christmas and New Year period.
- 35. Prior to entering UIT, all participants will be required to complete pre-UIT entry training. DCC plans to schedule this with the identified participants in the Autumn to ensure there is enough time for all participants to progress through this training, while being close enough to when UIT entry takes place so that the training is fresh.

#### 2.2.2. LSC Milestones

- 36. Consistent with past major DCC programmes, the Department has set LSC that need to have been met before the FSM solution can go live. The Department has developed its proposed LSC and consulted on these with DCC and with the SEC Panel. On 21 March 2025 the Department formally issued a Request for Information to the DCC setting out the LSC in support of the Secretary of State's FSM LSC decision. This request included the requirement for DCC to submit its evidence by the corresponding Milestone that will be included in the JIP following this consultation.
- 37. DCC has discussed the timetable for the submission of its evidence against the LSC with the Department. Consistent with the submissions for previous programmes, DCC will submit its final evidence to the Department and the SEC Panel six weeks prior to Go-Live. This will enable the SEC Panel, with the support of its Sub-Committees, to review the evidence and provide its recommendation to the Department in sufficient time for the Department to consider this in its determination. Noting that the proposed Go-Live date falls on a Saturday, DCC is proposing that the Department's decision should be made no later than the last Working Day prior to the planned Go-Live date.
- 38. Based on the planned Go-Live date of 21 March 2026, DCC will submit its LSC evidence no later than **9 February 2026**. The Department's decision would then be made no later than **20 March 2026**.

<sup>&</sup>lt;sup>9</sup> The UIT-A environment is the Production-like environment that almost all Test Participants have access to. The UIT-B environment is the development stream, but not all Test Participants have access to this environment.

### 2.3. Customer journey and key engagement milestones

- 39. Listening to our customers has been a key activity for DCC to foster a collaborative relationship with our stakeholders. We have set out a comprehensive, customer-centric engagement approach to support the replan activities, the Design and Build phases, LSC submission and FSM Go-Live.
- 40. The table below sets out DCC's planned engagement with stakeholder governance bodies during the delivery of the plan. The approach has been designed based on the information our customers have indicated is most relevant to them and in compliance with the SEC Panel's Programme Assurance Policy (PAP). These activities are potentially subject to change, depending on the needs of customers or the FSM Programme.

Activity	Description	Primary audience	Date
SEC Panel Paper	Share information on the circumstances leading to the delay to FSM, MP252 and associated implications following SEC Panel discussions	SEC Panel	Apr 25
FSM Go-Live Approach	Provide SEC Parties with an update on the FSM Programme, share Go-Live approach, and flag any implications and key milestones	OPSG, TABASC, TAG, SMKI PMA, SSC	May 25
Design & Build Updates	Discuss FSM Design and Build updates with SEC Parties	TABASC	Jun 25
FSM Testing Updates	Provide regular FSM testing updates to SEC Parties	TAG	Aug 25 – Mar 26
Migration Approach	Discuss FSM migration approach, including any user impacting changes required and the migration of user accounts, 4G orders and SSI data	OPSG	Sep 25
FSM LSC Evidence Approach	Share the FSM LSC evidence approach with SEC Parties	OPSG, TABASC, TAG, SMKI PMA, SSC	Sep 25
FSM LSC Engagement	Regular engagement with SEC Parties on LSC to ensure industry requirements have been met before Go Live	OPSG, TABASC, TAG, SMKI PMA, SSC	Oct 25 - Mar 26
SEC Panel Support for Go-Live	SEC Panel to write to DESNZ indicating whether it agrees the LSC have been met and DCC is ready for Go-Live	SEC Panel	Feb 26
Hypercare Engagement	Hypercare engagement with SEC Parties as required	Relevant SEC Parties	Mar 26 onwards

## 3. Re-designation date of the enduring SEC changes

- 41. DCC issued its consultation on the proposed regulatory changes required to deliver the FSM solution in January 2025. The enduring FSM solution will be delivered on the Go-Live date, when the existing DSMS will be deactivated and the ServiceNow platform will be subsequently activated during a maintenance window. DCC will share more details on the cutover plan and timings as part of the 'Migration Approach' activity on the customer engagement plan. The enduring changes to the SEC have all been drafted on the basis they will be implemented on Go-Live to reflect this replacement taking effect.
- 42. As part of that consultation, DCC consulted on a designation date for the enduring changes of 25 October 2025, or as soon as reasonably practicable within one month thereafter, to align with the original Go-Live date for the FSM solution. Following this replan and the change to the Go-Live date, this designation date is no longer appropriate. DCC is therefore consulting on a revised designation date for the enduring SEC changes.
- 43. We are therefore proposing that, subject to the timely receipt of DCC's conclusions report on this consultation, the Department will designate the enduring SEC changes on 21 March 2026, or as soon as reasonably practicable within one month thereafter as a contingency measure if required. A revised draft direction for the designation of the SEC documents can be found in Appendix B of this consultation document.

### 4. Next steps

- 44. Following the closure of this consultation, DCC will assess respondents' views and amend the draft plan as required. DCC will then submit an amended version of this plan to the Department that it considers suitable for approval.
- 45. DCC is aiming to provide a report to the Department by no later than 4 July 2025. This report will contain DCC's consideration of the responses to this consultation as well as the proposed updated plan and the proposed revised date for the designation of the enduring SEC changes. DCC will publish its conclusions document on its website.
- 46. Following the Department's decision on this plan, DCC will initiate a request with the IMF to add or amend the relevant Milestones on the JIP.

## 5. Consultation questions and how to respond

47. We are seeking your views on the following questions:

Do you agree with the proposed revised date for the 'Go-Live' Milestone of 21 March 2026?

Please provide your rationale for your response

Do you agree with the proposed revised date for the 'Confirmation of Regulatory Change' Milestone of 2 May 2025?

Please provide your rationale for your response

Q3	Do you agree with the proposed start and end dates for each of the SIT-B, UIT-B and UIT-A test windows for the FSM Programme?  Please provide your rationale for your response
Q4	Do you agree with the proposed dates for DCC's submission of evidence and the Department's decision on the LSC for the FSM Programme?  Please provide your rationale for your response
Q5	Do you consider there to be any additional Milestones needed that are missing from this revised plan?  Please provide your rationale for your response
Q6	Do you agree with the proposed customer engagement plan for the FSM Programme?  Please provide your rationale for your response
Q7	Do you agree with the proposed revised redesignation date for the enduring changes of 21 March 2026 (or as soon as reasonably practicable within one month thereafter)?  Please provide your rationale for your response

- 48. Please provide responses using the attached response form by **17:00 on Friday 30 May 2025** to DCC at consultations@smartdcc.co.uk.
- 49. Consultation responses may be published on our website (<a href="mailto:smartdcc.co.uk">smartdcc.co.uk</a>). Please state clearly in writing whether you want all or any part of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If the Department or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
- 50. If you have any questions about this consultation, please contact us at consultations@smartdcc.co.uk.

### 6. Attachments

- 51. This consultation includes one attachment:
  - Attachment 1: Consultation response form

# Appendix A - FSM delivery plan Milestones

This table summarises the proposed Milestones for the FSM Programme described in section 2 of this document. The existing Milestones are shown in the pink rows; all other Milestones are new.

FSM Milestone	Description	Date
Confirmation on Regulatory Change (existing Milestone)	Latest point DCC will issue a conclusions document on the transitional and enduring regulatory drafting changes needed for the FSM Programme along with conclusions on plans for implementation of those regulatory change	<del>30 Mar 25</del> 02 May 25
SIT-B Commences	Latest possible date at which SIT starts for all Service Providers	04 Aug 25
SIT-B Exit	Latest possible date for SIT completion decision for all Service Providers by the designated governance body as advised by DESNZ	17 Oct 25
UIT-B Commences	Latest point at which User testing starts in the UIT-B environment	01 Dec 25
UIT-A Commences	Latest point at which User testing starts in the UIT-A environment	01 Dec 25
UIT-B Exit	Latest possible date for the User testing window in the UIT-B environment to close	23 Jan 26
UIT-A Exit	Latest possible date for the User testing window in the UIT-A environment to close	23 Jan 26
LSC Go-Live Submission	Latest date by which DCC will issue its LSC submission to DESNZ and SEC Panel	09 Feb 26
LSC Go-Live Decision	Response from DESNZ for approval prior to deploying changes to Live systems, following SEC Panel recommendation	20 Mar 26
<b>Go-Live</b> (existing Milestone)	All capabilities live and the migration of all SSI User data and 4G CH orders to the new platform completed	<del>25 Oct 25</del> 21 Mar 26

## Appendix B - Draft direction text for the enduring changes

This appendix contains the revised text that the Department plans to use for the approval of the enduring changes to the SEC for FSM.

This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 21 March 2026:

- The SMKI Registration Authority Policies and Procedures previously designated and incorporated into the SEC as Appendix D;
- the CH Handover Support Materials previously designated and incorporated into the SEC as Appendix H;
- the CH Installation and Maintenance Support Materials previously designated and incorporated into the SEC as Appendix I;
- the Enduring Testing Approach Document previously designated and incorporated into the SEC as Appendix J;
- the SMKI and Repository Test Scenarios Document previously designated and incorporated into the SEC as Appendix K;
- the Common Test Scenarios Document' previously designated and incorporated into the SEC as Appendix R;
- the DCCKI Certificate Policy previously designated and incorporated into the SEC as Appendix S;
- the DCCKI Interface Design Specification previously designated and incorporated into the SEC as Appendix T;
- the DCCKI Code of Connection and DCCKI Repository Code of Connection previously designated and incorporated into the SEC as Appendix V;
- the DCCKI Registration Authority Policies and Procedures previously designated and incorporated into the SEC as Appendix W;
- the Threshold Anomaly Detection Procedures previously designated and incorporated into the SEC as Appendix AA;
- the Self Service Interface Access Control Specification previously designated and incorporated into the SEC as Appendix AH; and
- the Self Service Interface Code of Connection previously designated and incorporated into the SEC as Appendix AI

are hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC, the Secretary of State also directs that, with effect from 21 March 2026, SEC Section A 'Definitions and Interpretations' and SEC Section F 'Smart Metering System Requirements' are hereby consequentially modified in the form set out

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in Annex [XX] to this direction to incorporate the consequential amendments arising from the above redesignations.

For the avoidance of doubt such re-designation of these documents shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents being re-designated, or the continuing effectiveness of anything done in these documents prior to their re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.