

Further Testing Consultation – Conclusions Document

**DCC Conclusions and Report to Secretary of State on
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 Introduction and Context

The SEC Variation Testing Approach Document for SMETS1 Services ('SMETS1 SVTAD') is included in the Smart Energy Code (SEC) as Appendix AK¹ and the latest version 1.4 was re-designated by the Secretary of State on 4 November 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 1.2 of the MTAD² on 4 November 2019.

On 19 December 2019, DCC issued a consultation that sought views on a few additional changes to the SMETS1 SVTAD and the MTAD covering:

- the completion arrangements for testing undertaken to support the process for Device Model Combination Testing (DMCT Process);
- clarification and alignment for exit criteria related to end of cycle testing covering Systems Integration Testing (SIT) and Migration Testing (MT); and
- provisions to allow firmware changes during testing in respect of the DMC being used in testing for the Secure cohort of MOC.

The consultation also sought views on a proposal **not** to amend the Service Request Processing Document (SRPD) to support deployment of urgent firmware upgrades to enrolled SMETS1 devices on security grounds prior to the new firmware version having been tested via a fast track process in the context of PPCT.

The consultation document sought views on the detailed changes to the SMETS1 SVTAD and MTAD to support these changes and the proposed amendment date for the SVTAD and MTAD.

This document considers responses to this consultation.

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.

On Thursday 19 December 2019, DCC published the consultation³ document titled '[Further Testing Consultation](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

¹ The current SEC is available via the SECAS website - www.smartenergycodecompany.co.uk/the-smart-energy-code-2/.

² The current MTAD is available via the SECAS website - [Migration Testing Approach Document for SMETS1 Services v1.2](#).

³ <https://www.smartdcc.co.uk/customer-hub/consultations/further-testing-consultation/>

The key scope of the consultation was the following areas:

- Migration Testing Approach Document for SMETS1 Services version 1.3;
- SEC Variation Testing Approach Document for SMETS1 Services version 1.5;
- draft text for DCC's notification of the amendment for the SMETS1 SVTAD and MTAD; and
- the envisaged decision date for DCC to notify an amendment for the SMETS1 SVTAD and MTAD.

Stakeholders were invited to respond by 16:00 on Friday 17 January 2020 in a template format that was attached to the consultation.

During the consultation period DCC presented an overview of the consultation with the Testing Advisory Group at TAG62X on Tuesday 14 January 2020. Further discussions were also held at TAG63 on 30 January 2020 and TAG comments and DCC's response to those are set out below.

3.1 Consultation Questions

The [Further Testing Consultation Response Template](#) presented five questions covering the consultation as presented in Figure 1.

Figure 1 – Further Testing Consultation Questions

Number	Question
FTC Q1	Do you have any views on the proposal for DMCT Process test completion? Do you have any detailed comments on the relevant changes to the legal drafting in the SMETS1 SVTAD? Please provide a rationale for your views.
FTC Q2	Do you have any views on the proposals for the new end of cycle exit criterion for SIT and changes to the end of cycle exit criterion for MT? Do you have any detailed comments on the relevant changes to the legal drafting in the SMETS1 SVTAD and MTAD? Please provide a rationale for your views.
FTC Q3	Do you have any views on the proposal for changes to the device deselection rules related to the Secure cohort in MOC and retention of the existing regime for IOC? Do you have any detailed comments on the relevant changes to the legal drafting in SMETS1 SVTAD? Please provide a rationale for your views.
FTC Q4	Do you have any views on the proposal not to amend the SRPD with regards to a security fast track process for PPCT? Please provide a rationale for your views.
FTC Q5	Do you agree with the proposed amendment date of Friday 31 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD and the MTAD using draft notification at Attachment 1?

3.2 Respondents

DCC received six written responses to the Further Testing Consultation including the Security Sub-Committee (SSC). A copy of every submission to the consultation was provided to the Secretary of State once the consultation had closed.

4 Analysis of Responses

DCC has analysed the feedback provided by each respondent and considered the views provided by the TAG. 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 DMCT Completion (FTC Q1)

DCC sought views on the approach to DMCT completion asking *“FTC Q1 Do you have any views on the proposal for DMCT Process test completion? Do you have any detailed comments on the relevant changes to the legal drafting in the SMETS1 SVTAD? Please provide a rationale for your views.”*.

4.1.1 Respondent View

DCC received a response from all respondents on the proposal for DMCT completion:

- no respondents objected to the proposal;
- two respondents supported the proposal; and
- three respondents made observations without expressing an explicit view to either support or reject the proposal.

Two respondents that expressed support indicated that they wanted increased visibility of any open test issues that had been excluded from the count for determining whether the testing issue thresholds for successful test completion had been exceeded, and some element of stakeholder approval for any exclusion. Whilst the content of each draft DMCT Testing Report (Clause 20.34 and Clause 20.35 of the SMETS1 SVTAD) and right of appeal for an impacted Supplier Party regarding the outcome each draft DMCT Testing Report (Clause 20.37 of the SMETS1 SVTAD) provides an element of visibility and a right to object to DCC's decisions in the area, it is noted that these reports are only provided to Suppliers that included the DMC in its DMCT submission, which might not include Suppliers of such DMCs with Dormant Meters. TAG also considered that it should be consulted on open Testing Issues and the severity that the DCC has assigned to them. DCC accepts that seeking the TAG's view on any exclusion and the severity of open Testing Issues would act as a prudent safeguard. The legal drafting will be amended to include the requirement for exclusions and severity ratings to be presented to the TAG and a right of referral to the Secretary of State where the TAG disagrees with DCC regarding the treatment of open Testing Issue and, if upheld, the TAG's view would result in the status of testing (successful or unsuccessful) changing.

One respondent expressed general support for the use of substantive equivalence with the DMCT Process (as per Clause 20.6 (d) of the SMETS1 SVTAD). The respondent requested that DCC provide further information on the envisaged approach in order to ensure consistent treatment within the DMCT Process. DCC had already recognised this requirement and will be engaging with industry via TAG and TBDG to provide further details on the planned approach to substantive equivalence.

One respondent sought clarity on how each DMCT EPCL Report will be published. Clause 20.43 of the SMETS1 SVTAD states that the DMCT EPCL Report will be published on the DCC Website and that various stakeholders (the Panel, the Secretary of State, the Authority and SEC Parties) will be advised. The notification of each DMCT EPCL Report to stakeholders will utilise DCC's Service Centre's existing email notification process based on nominated contacts⁴ as per Section M10 of the SEC.

One respondent highlighted the importance of ensuring that the draft DMCT Reports are sent to appropriate contacts within each relevant Supplier Party given the 10 working days appeal window within Clause 20.37 of the SMETS1 SVTAD. DCC is focused on improving internal processes and DCC notes the importance of appropriate communications. On this basis, DCC has amended the regime that supports the request for information process (set out in Clause 20.2 of the SMETS1 SVTAD) such that each Supplier Party can provide additional contact details to receive each draft DMCT Testing Report as per clause 20.36 of the SMETS1 SVTAD as well as the existing nominated contacts that are already provided by SEC Parties to DCC's Service Centre. The drafting in Clause 20.36 of the SMETS1 SVTAD has been amended to reflect this.

One respondent indicated support for the right of appeal regarding the outcome of each draft DMCT Testing Report within Clause 20.36 of the SMETS1 SVTAD.

One respondent accepted that the DMCT process involves only DCC and any Supplier Party proposing enrolment of the particular planned entry on the EPCL. However, this respondent expressed concern that an Energy Supplier with dormant DMCs of the same type or those that inherit the DMC via a change of supplier event will not have knowledge of any issues that arose during the DMCT Process. This respondent wished to confirm that DCC's review of the issues will consider operational impacts on other users into their assessment; DCC can confirm that the review of issues covers impacts on the wider stakeholders and not only the Responsible Supplier. DCC considers that the publication of each DMCT EPCL (Clause 20.43 of the SMETS1 SVTAD) will provide insight for all stakeholders into any issues that arose during the successful completion of DMCT.

4.1.2 Areas of Disagreement

There were no areas of disagreement.

4.2 End of Cycle Exit Criteria (FTC Q2)

DCC sought views on exit criteria for end of cycle across MT and SIT asking "*FTC Q2 Do you have any views on the proposals for the new end of cycle exit criterion for SIT and changes to the end of cycle exit criterion for MT? Do you have any detailed comments on the*

⁴ NB A SEC Party may change details for a nominated contact (i.e. lead contacts, back-up contacts and SMETS1 contacts) by engagement with DCC's Service Centre.

relevant changes to the legal drafting in the SMETS1 SVTAD and MTAD? Please provide a rationale for your views.”.

4.2.1 Respondent View

DCC received a response from five respondents on the proposals related to the exit criteria for MT and SIT:

- no respondents objected to the proposal;
- four respondents supported the proposal; and
- one respondent indicated they had no comments on this proposal.

4.2.2 Areas of Disagreement

One respondent suggested that Table 13.1 of the SMETS1 SVTAD should explicitly require two End of Cycle runs to support suitable comparison and validation. DCC does not consider that Table 13.1 of the SMETS1 SVTAD should be amended as the requirement for two end of cycle test runs for MOC and FOC is already mandated by Clause 7.4 (c) of the SMETS1 SVTAD.

4.3 Firmware change for MOC Secure (FTC Q3)

DCC sought views on the changes to firmware deselection for MOC Secure asking “FTC Q3 Do you have any views on the proposal for changes to the device deselection rules related to the Secure cohort in MOC and retention of the existing regime for IOC? Do you have any detailed comments on the relevant changes to the legal drafting in SMETS1 SVTAD? Please provide a rationale for your views.”.

4.3.1 Respondent View

DCC received a response from five respondents on the proposal to amend the firmware deselection rules for MOC Secure:

- no respondents objected to the proposal;
- three respondents supported the proposal; and
- two respondents made observations without expressing an explicit view to either support or reject the proposal.

One respondent expressed concern that the legal drafting related to firmware changing for MOC and FOC seems overly complicated and suggested that it was structured to separate the clauses for MOC and FOC entirely. DCC has made a few minor amendments to the legal drafting to improve clarity in this area.

Two respondents indicated the importance that any changes in firmware for MOC are appropriately retested (including regression testing) and not de-scoped. DCC has engaged with the TAG on these matters and the approach to re-testing should firmware change is covered in the relevant Depth and Breadth documents.

4.3.2 Areas of Disagreement

There were no areas of disagreement.

4.4 SMETS1 Pending Product Combinations Tests Security Fast Track (FTC Q4)

DCC sought views on a proposal not to amend SRPD in relation to PPCT asking “*FTC Q4 Do you have any views on the proposal not to amend the SRPD with regards to a security fast track process for PPCT? Please provide a rationale for your views.*”.

4.4.1 Respondent View

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

- the SSC objected to the proposal raising security related concerns; and
- five of the respondents supported the proposal.

The SSC’s objection to the proposal focused on the security implications related to a delay in the firmware update being deployed to each Enrolled device prior to completion of the fast track PPCT testing. DCC will engage with the SCC to further explore these additional security concerns prior to concluding in this area.

4.4.2 Areas of Disagreement

One respondent indicated that they wish to obtain further details on the planned fast track process. At this point, DCC are not proposing anything further in this area other than the drafting on Pending Product Combination Testing that is already in the Enduring Test Approach Document (ETAD).

4.5 Clause 4.2 of the SMETS1 SVTAD – DCC Amendment (FTC Q5)

In relation to Clause 4.2 of the SMETS1 SVTAD, DCC sought views on the proposal to amend SMETS1 SVTAD and MTAD asking “*FTC Q5 Do you agree with the proposed amendment date of Friday 31 January 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD and the MTAD using draft notification at Attachment 1?*”.

4.5.1 Respondent View

DCC received a response from five respondents on the proposal for DCC to amend the SMETS1 SVTAD and MTAD:

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

One respondent highlighted a typographical error in this question as the date was 31 January 2019 rather than 31 January 2020. DCC agrees this was a typographical error. DCC also notes that the main text within Section 5 of the consultation document correctly identified the date as 31 January 2020.

4.5.2 Areas of Disagreement

One respondent expressed a view that there was insufficient time for DCC to adequately review the responses. DCC accepts that the timetable may appear limited, however, in setting the schedule DCC considered that it was appropriate given the limited nature of the

changes proposed and an expectation that there would not be major objections from interested stakeholders. The nature and number of responses received by DCC is in line with this expectation. Thus, DCC considers it appropriate to conclude promptly consistent with the proposal set out in the consultation document.

5 Summary of Changes to the MTAD and SMETS1 SVTAD

The consultation process has given rise to a limited 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 improve clarity.

Additionally, an overview of key changes to the MTAD and SMETS1 SVTAD (Figure 2) are set out below for information. Please note that the Clause references in Figure 2 are based on conclusion versions attached to this document i.e. MTAD V1.3 and SMETS1 SVTAD V1.5.

Figure 2 – Changes to the Legal Drafting

Drafting Reference	Description and Rationale for change
SMETS1 SVTAD Clause 20.36	Addition to allow for nominated contact details to be provide for reporting on each Draft DMCT Testing Report.
SMETS1 SVTAD Clauses 20.28 to 20.30, and Clauses 20.38 to 20.39	Change to provide for TAG approval on any excluded Testing Issues and severity of Testing Issue and a right of referral to the Secretary of State if DCC and TAG don't agree.
SMETS1 SVTAD Clause 20.41	Change to clarify the need for a DMCT EPCL Report even in the case of substantial equivalence and the supporting information for each DMCT EPCL Report.

6 Conclusions

DCC intends to amend the SMETS1 SVTAD and MTAD with the changes proposed in the Further Testing Consultation given the responses received.

Consistent with the requirements set out in Clause 4.2 of the SMETS1 SVTAD DCC has undertaken appropriate consultation with stakeholders in relation to the proposed amendments to the SMETS1 SVTAD and MTAD.

DCC is confident that the SMETS1 SVTAD and MTAD submitted to the Secretary of State reflects the requirements for document submission. 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 and as such 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 amendment by DCC;
- the revised SMETS1 SVTAD is defined to a sufficient level of detail for amendment into the SEC by DCC;
- 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.

DCC plans to provide a further update on firmware being deployed to Enrolled devices prior to the PPCT fast track testing as soon as possible once the additional security concerns raised have been further explored.

7 Next Steps

DCC submitted the SMETS1 SVTAD and MTAD and this conclusions report to the Secretary of State on 30 January 2020.

DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the SMETS1 SVTAD and 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 MTAD on 6 February 2020. 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.

8 Attachments

- Attachment 1 – Draft Notification Text for modifying the SMETS1 SVTAD and MTAD
- Attachment 2 – SEC Variation Testing Approach Document for SMETS1 Services v1.5 - clean version
- Attachment 3 – SEC Variation Testing Approach Document for SMETS1 Services v1.5 - DELTA from version v1.4 (current SEC version)
- Attachment 4 – SEC Variation Testing Approach Document for SMETS1 Services v1.5 - DELTA from consultation version v1.5
- Attachment 5 – Migration Testing Approach Document for SMETS1 Services v1.3 - clean version
- Attachment 6 – Migration Testing Approach Document for SMETS1 Services v1.3 - DELTA from v1.2 (current approved version)

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- Attachment 7 – Migration Testing Approach Document for SMETS1 Services v1.3 - DELTA from consultation version v1.3

Attachment 1

This attachment contains the text that DCC intend to utilise for modification of the SMETS1 SVTAD and MTAD. The date for modification of the amended SMETS1 SVTAD and MTAD will be subject to the Secretary of State not directing otherwise.

Draft Notification Text

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 6 February 2020 that the SMETS1 SVTAD and the MTAD are hereby modified and approved pursuant to the SMETS1 SVTAD in the form set out in Annex A and Annex B 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 each of these documents first being 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 modified documents).

This notification is also being sent to the SEC Administrator.