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Conclusions from the consultation on the delivery plan for Enduring Change of Supplier

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# Introduction

On 1 August 2019, DCC received direction from BEIS for the purposes of Condition 13A of the Smart Meter Communications Licence (the DCC licence), to work to produce a plan for Enduring Change of Supplier (ECoS) arrangements.

Between August 2019 and January 2020, DCC produced a draft delivery plan for the design, development and implementation, of the systems, processes and procedures intended to comprise the ECoS arrangements (the delivery plan).

In accordance with Condition 13A of the DCC licence, DCC issued the SEC Panel and all SEC Parties, a draft delivery plan for consultation, on 23 January 2020.

DCC received five responses to the consultation on the content of the plan and has reviewed them. We would like to thank those organisations that provided feedback and comments on the delivery plan.

There was broad comfort on the delivery plan from respondents. Following feedback from consultation, DCC has submitted the delivery plan to the Secretary of State for approval.

This document responds to several comments that were made during the consultation and provides a conclusion on what was amended in the final delivery plan.

# Feedback on the DCC plan

## Responses to the consultation questions on the DCC plan

Within its consultation document, DCC asked industry to consider four specific questions. In total, five organisations responded to the delivery plan, providing direct responses to some, or all the questions.

The questions were split into three sections:

* LC13A plan and milestones
* Contingency
* Risks, assumptions and dependencies

A summary of the responses against each of the questions is summarised in the sections below.

### LC13A plan and milestones (Question 1 and Question 2)

DCC asked two questions regarding the LC13A plan and milestones. An overview of the respondents’ comments against each of the questions, and DCC’s response, is summarised in the sections below.

#### Question 1

Question 1 asked for responses on overall comfort with the plan, dates and milestones, as follows:

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| Q1 | Are you content with the LC13A plan for ECoS set out in this document, with the proposed milestones and dates set out in Annex A? |

#### Summary of submissions on Question 1

Five organisations responded to question 1 directly. The respondents were broadly content with the draft delivery plan for ECoS.

One respondent commented that the proposed approach to programme governance, underpinned by regulation, is very similar to the approach used by BEIS to oversee and govern all the major transitional activities undertaken as part of the Smart Metering Implementation Programme (SMIP). Because of this, the governance mechanisms proposed as part of this plan represent a tried and tested approach that DCC, governance bodies, and SEC Parties are familiar with.

Several respondents commented that some dependencies may require a degree of industry co-ordination and they welcomed DCC’s commitment to continue to consult with stakeholders in respect of specific decisions.

Several questions were put forward regarding whether there would opportunities to carry out future assessment of programme readiness, and whether there would be opportunities to have direct input into the changes required to the SEC.

#### DCC response to submissions on Question 1

DCC notes that all respondents are broadly supportive of the content of the plan and the proposed milestones.

In response to questions put forward about future engagement, DCC would like to reiterate that engagement with all stakeholders will occur throughout the lifecycle of the project. DCC will ensure stakeholders are kept informed and are adequately consulted through various channels and governance groups including engagement with the SEC Panel and its sub-committees, particularly the TAG, the SEC Ops group, the SSC and the SMKI PMA as relevant, and on programme progress with the Implementation Managers Forum, the Smart Metering Delivery Group, and other transitional bodies as relevant.

All stakeholders will be kept informed on DCC’s progress against the plan through regular reporting, and stakeholder feedback and engagement activities will be considered in the development and rollout of the project. DCC will continue to evolve and develop stakeholder engagement to ensure transparency and that stakeholders are kept informed, have an opportunity to shape proposals, and can also help guide DCC’s direction.

#### Question 2

The second question was a borad question asking for submissions on any concerns, or suggestions for improvement, as follows:

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| Q2 | Are there any specific areas of the plan where you have concerns, or have suggestions for improvement? |

#### Summary of submissions on Question 2

All respondents provided comments under this question. There were several comments relating to different aspects of the delivery plan. As such, we have drawn out the key points from individual submissions and provided DCC’s response in the table below.

#### Table outlining submissions on Question 2 and DCC’s response

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| Area of the ECoS delivery plan | Consultation submissions on ECoS delivery plan | DCC’s response |
| Pre Intergration Testing (PIT) | One respondent was pleased to see the availability of manufacturers’ test metering devices being listed as a dependency (DEP4), and particularly that the mitigation proposed for the SIT and UIT phases makes no mention of emulators. While they acknowledged that PIT may be different in that is not an end-to-end phase of the project plan, they were concerned that the proposed use of emulators in that phase might, in itself, serve to indicate a willingness to subsequently consider them as a viable alternative. | As stated within the consultation document, PIT is not and end to end test phase. It would therefore be difficult for the Service Providers to use devices. Devices will be used for all end to end test phases, SIT and UIT. Considering emulators are a viable alternative, they will not be considered as an option for exiting these phases. |
| Plan summary | One respondent questioned whether DCC would be looking for User Support during the selection and procurement process. | DCC will get in touch directly if User Support is required during the selection and procurement process. |
| Key interactions with other DCC deliverables | One respondent noted that as part of the transition from TCoS to ECoS, DCC would be required to carry out the function of full end to end testing and migration of devices, however they considered further impacts and consideration need to be given to:* Management of the migration devices from using TCoS certificates to ECoS certificates.
* Changes to Smart Metering Key Infrastructure (SMKI) and DCC Key Infrastructure (DCCKI)
* Identification of Assets with TCoS certificates and ECoS certificates within DCC User systems.
 | DCC notes these comments. This detail has always been captured in the lower level project plan to support ECoS delivery and migration. Also fundamental to this, is that service suppliers will be engaged continually around requirements for supporting and implementing TCoS to ECoS migration. |
| Pre Integration Testing (PIT) and System Integration Testing Phases | One respondent noted that the LC13A plan indicates that the PIT and SIT phases are scheduled to be completed between October 2021 and February 2022. They consider that based on previous DCC-led programmes, this five-month window is unlikely be sufficient especially given the Christmas / New Year holiday period. They consider that rushing these phases is likely to mean that issues and problems are not identified or remediated, resulting in subsequent delays and delivery of solutions in a sub-optimal and costly way. They consider that six-months should be allocated to the PIT and SIT phases. | All of the current timelines in the delivery plan are indicative. Once a supplier is procured to deliver the ECoS functionality, the points raised will be captured and discussed fully, and finalised as part of the project deliverables. |
| SIT Utilising Physical Devices | A respondent referred to Section 5.5.2 that explains that DCC will use emulators, stubs and/or drivers to ensure that SIT can commence at the appropriate time. They consider that DCC should avoid relying on solutions solely to meet programme deadlines. They noted that stakeholders have previously raised concerns at DCC’s reliance on emulators for testing, preferring to see much greater reliance on testing with physical meter assets. | As section 5.5.2 states, this is a contingency. DCC will be working to ensure SIT will commence and progress with devices. |
| TCoS to ECoS migration | Two respondents noted that it not yet clear, or detailed in the delivery plan, how transition arrangement will be delivered. One respondent noted that the LC13A consultation document does not give any additional information on critical DCC assumptions underpinning the 10-month migration period in 2022 and 2023. For example:* The migration pace needed to meet the projected 10-month migration window.
* The prioritisation of migrations based on meter types, meter combinations and / or customer types.
* Any potential impacts to other operational DCC services, including outages.
* Factors which could impact on the maintenance and operation of SMETS1 / SMETS2 assets.
* Factors which could impact on delivery of services to energy consumers, who will be entirely unaware of the industry ECoS programme.

This respondent considered that the TCoS to ECoS migration phase should be broken down into its various component parts to allow the resource, duration and cost impacts of each phase to be fully understood, and the consequences of late delivery by the DCC to be determined. | DCC notes these comments. |
| Testing environment | One respondent considered that insufficient detail was provided regarding how testing environment usage will be managed. They noted that consultation states that an environments schedule will be shared at the appropriate governance fora, but it does not specify what these fora will be or what, if any, governance will accompany this. They requested further detail around what role its Sub-Committees, particularly the TAG, will play in overseeing environment usage.The testing contingency approach set out in the consultation document would see testing of ECOS interactions with the CSS take place outside both the SIT and User Integration Testing (UIT) environments. They stated that it was unclear from the consultation document where this testing would take place, and how reflective that environment will be of the production environment. The respondent requested further detail around where this contingent testing would be exercised, and what governance would accompany that. | Environment control will follow current DCC processes as well as the new proposed process of making this an agenda item regularly discussed at TAG.As highlighted in Section 5.5.5, this is a contingency and if it is needed, it would be run as a separate sub-project and will be planned accordingly with the relevant testing environments being made available. |
| Testing environment contention | One respondent noted that as with all DCC releases test environment contention is often a critical issue. The timing of ECoS delivery will coincide with other changes and, based on current test environment capability, it was not clear how this can be effectively managed. | Environment control will follow current DCC processes as well as the new proposed process of making this and agenda item regularly discussed at TAG. |
| Continued engagement | One respondent considers that DCC needs to ensure that Users are kept informed of progress, have sight and input into risk and issues, right through the ECoS delivery. They noted that engagement with device manufacturers also needs to be maintained throughtout the project with clear governance and requirements provided to ensure any device availability is suitably managed. | DCC notes this comment. DCC aims to work in step with its stakeholders to keep them informed of progress, and where appropriate will seek input from stakeholders on how programmes develop. |
| Interaction with DSP retender and CSS delivery | One respondent welcomed further information on how the interaction between these 3 major developments will be managed and coordinated and, more importantly, what the dependencies are between them and how any slippage will impact or be mitigated. They outlined that they would expect to see some scenario planning being carried out to assess the risk and to determine what, if any, impact slippage in CSS or DSP retender would on ECoS delivery. | Noted. Risk R1 and Section 5.5.5 of the Consultation Document relates to CSS Delivery delays explicitly and how they will be mitigated. It should also be noted, that CSS is a key dependency in supporting the delivery of ECoS and internal activities to manage alignment are ongoing. |

### Contingency (Question 3)

DCC asked one one question regarding the proposal for including contingency within the plan, as follows:

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| Q3 | Do you have any comments on DCC’s proposal for five months of contingency within the plan, or on the proposals for managing release of this time? |

#### Summary of submissions on Question 3

All five respondents provided comment on the contingency within the plan. There was broad support for five months of contingency within the plan and many responders agreed that it is sensible.

Comments were largely focused around the processes and governance arrangements that would be set up, if the contingency time was required. Several organisations stressed that they would expect any decision on contingency to take place well in advance of the milestones that cannot be met, rather than an approach where milestones are missed, and contingency becomes a retrospective activity.

Additional detail was requested around the role that responders might play in the governance of any decision to draw on contingency time. Questions were asked about how DCC Users will be provided with new milestones and timelines and whether there will be any regular reporting. It was reiterated that regular reporting was important, not only in terms of contingency but also overall delivery of this item.

#### DCC’s response to submissions on Question 3

DCC agrees that if the contingency is utilised that all stakeholders will need to be provided with advanced warning of both new milestones and timelines. Once the RFP has been distributed, DCC will set up a Steering Group to oversee the project deliverables with internal and external stakeholders. Finalising contracts will allow milestones and timelines to be updated. As more detail becomes available, and when a CoS party is on board, more refined planning will take place and DCC will be in a position to update all stakeholders on any milestones and timelines that might need to change.

The decision to use programme contingency will be made following engagement with programme stakeholders to ensure any impacts on wider programme delivery are fully understood and assessed.

### Risks, Assumptions and Dependencies (Question 4)

DCC asked one questions regarding the risks, assumptions and dependencies in relation to the ECoS plan, as follows:

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| Q4 | Do you have any comments on DCC’s assessments of the risks, assumptions and dependencies in relation to the ECoS plan? |

#### Summary of submissions on Question 4

All parties responded to question 4 directly, with mixed responses regarding the risks, assumptions and dependencies, as outlined in the draft delivery plan for ECoS.

Two of the respondents did not have any specific comments but noted that as delivery progresses, they expect DCC to continue to engage with stakeholders.

Three of the respondents provided detailed comments on specifc risks, assumptions and dependencies. Where DCC considers that an appropriate explanation is not adequately captured either in the delivery plan, or elsewhere in this consultation conlclusion document, DCC responses to those submissions are provided in the table below.

#### Table oulining submissions on Question 4 and DCC’s response

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| Description | Submissions on Risks, Assumptions and Dependencies in ECoS delivery plan | DCC’s response |
| Additional risks proposed for inclusion in delivery plan | One respondent suggested risks that should be added to the delivery plan:1. *“There is a risk that the DCC Adapter providers need to make changes to be able to distinguish, and target, SRs to assets which are at TCoS or at ECoS”.*
2. *“There is a risk that the migration of assets from TCoS to ECoS does not cover all DCC User devices”.*
3. *“There is a risk that device manufactureers will not have the devices available for testing”.*
 | Our comments on each of these three risks is outlined below:1. *We do not consider this a risk because there is not going to be a change to the adapter*
2. *We have added this risk to the delivery plan. It is now captured as R18.*
3. *We consider that this point is adequately covered by R9 and A2.*
 |
| Assumption – GBCS specification required for ECoS | One respondent stated that Assumption A4 assumes that there will be no changes to GBCS, however if there are changes required to allow normal service for devices with TCoS and ECoS these would need to be identified and serviced which would result in changes to GBCS, DUIS, and MMC. These need to be made visible to DCC Users and impacted parties at the earliest opportunity. | The design allows for this. There will be a lookup and routing of messages, applying the logic aroud ECoS or TCoS and depending on SMETS1 or SMETS2 devices. |
| Energy consumer impacts | One responder was disappointed that DCC did not include an obvious reference to energy consumer impacts in any of the risks, assumptions or dependencies. They consider that potential energy consumer impacts do exist and will materialise where delivery is poorly controlled or executed. | Thank you for this feedback. In the risk modelling we have not identified any inherent risks to the consumer, nor any residual risk. There is an overarching principle that DCC and its partners will always seek to deliver value for money to the consumer, as well as (in the case of the ECoS project), a more efficient and secure Change of Supplier process from within DCC Total Systems. |
| Assumption – Meter Device Prerequisite Requirements | The risks section makes no definitive statements on SMETS1 or SMETS2 meter firmware variant prerequisites. The DCC must clarify if new firmware variants will be required, given the associated costs and time to develop, test and subsequently deploy OTA upgrades to installed assets. | DCC have not identified any specific area where new firmware will be needed before a device can be migrated to ECoS. There could be a small inherent risk during the transition phase, as with any other change, however we don’t believe this is directly related, nor caused by firmware already deployed, either SMETS1 or SMETS2+. |
| Assumption – Energy Supplier Impacts from Failed Migration | One responder was concerned that Assumption A5 states that there will be ‘little or no impact’ to energy suppliers if the migration from TCoS to ECoS results in issues. They considered that this appears to directly conflict with risk R15 which highlights the potential impacts to operational meter devices and therefore energy suppliers and energy consumers. On that basis, they considered that assumption A5 warrants further review and clarification and explanation of the appropriate mitigations. | Thank you for the question. To clarify, A5 states “Energy suppliers are not expected to be impacted by the migration from TCoS to ECoS 2”. A5 was included to protect and inform the Energy Suppliers as much as possible to reduce inherent risk during the migration to ECoS. If a device has a TCoS certificate, CoS will be done using the TCoS system internal to DCC and invisible to DCC Users, and if a device has an ECoS certificate, supplier change will be executed by ECoS, also invisible to the DCC User. R15 is highlighting the risk that if a device does not have an ECoS certificate and the TCoS system is decommissioned, there will be no way to do a Change of Supplier (as the CoS will rely on ECoS certificates being on the devices). We hope that the additional statement “The ECoS programme will work with Device Management and TSP to ensure compatibility” provides some reassurance. |
| Assumption – Aggregate Anamoly Detection thresholds for CoS events | One responder commented that Assumption A6 states that there will be ‘no impact’ if the definition of Aggregate Anomaly Detection Thresholds is incorrectly delivered by the DCC. Given the volume of events that the ECoS service will support, the incorrect definition and application of Anomaly Detection Thresholds Attributes would be visible outside the DCC. Conceivably such a situation would impact switching requests initiated by energy consumers, and therefore be visible to other parties. This respondent consider that assumptions warrants further review and clarification by the DCC. | It is true that if ADTs were incorrectly applied they would have an impact, however A6 is listed as an assumption i.e. “Aggregate Anomoly Detection Thresholds for CoS Events and Change of CoS Party to be defined by DCC and agreed by SSC”, and is not a reference to aggregate ADT’s being incorrectly delivered. DCC would not be able to publicly share any information unless it has explicit authorisation to do so. |
| The usage of a shared test environment | One respondent welcomed the mitigation proposed in response to risk R8, which relates to the risks arising as a result of using shared testing environments. They requested that an integrated environments usage plan which considers all of DCC change activities is made available to the TAG and Parties and on an ongoing basis. | Noted. The environments plan has already been made available. |

# Conclusions

DCC is grateful for the responses received on the ECoS delivery plan consultation. Following review and consideration of these responses, DCC has incorporated stakeholder feedback into programme and project plans. The final delivery plan now includes a new risk, R18 (The migration of assets from TCoS to ECoS does not cover all DCC User devices).

DCC’s approach to engagement is to be transaparent and communicate with its stakeholders over the course of the development and delivery of its programmes. DCC aims to work in step with its stakeholders to keep them informed of progress, and where appropriate seek input from stakeholders on how programmes develop.

Due to the mandated nature of this programme, DCC will continue to incorporate feedback into the delivery of ECoS, as and where appropriate. We will communicate to stakeholders where and how their feedback was used. Conversely, where feedback can not be incorporated, DCC will demonstrate why it was not used.

# Next steps

DCC has published the final version of the delivery plan on the DCC website.