



**November 2020 SEC Variation Testing Approach  
Document (November 2020 SVTAD)  
Conclusions Document**

**DCC Conclusions and Report to Secretary of State on  
the proposed November 2020 SVTAD**

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# 1. Introduction and Context

The November 2020 SEC Release is expected to include both Smart Energy Code (SEC) Modifications and the Department of Business, Energy and Industrial Strategy (BEIS) directed changes.

Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the SEC, the Secretary of State has directed the DCC to develop a draft SEC Variation Testing Approach Document in respect of those variations to the SEC proposed to be made for the purposes of the “BEIS Q4 2020” package (November 2020 SVTAD), which are currently planned to be given legal effect on a planned go-live date of 29 November 2020.

The SEC Variation Testing Approach Document is a high-level framework for the testing for the BEIS directed changes included and will require the production of a document, a Testing Approach Document, to contain the detailed testing approach. The November 2020 SVTAD recognises that the Testing Approach Document’s scope may also include tests that are required to support SEC Modifications that are planned to be introduced into the SEC at the same time as the BEIS Q4 2020 changes are to be made.

The 14/05/20 [consultation](#) sought views on the DCC’s proposal for the draft November 2020 SVTAD and, on behalf of the Secretary of State, on the date for designation of the SVTAD, which would bring it into legal effect. The [consultation](#) closed on 10/06/20 and this document provides a summary of the responses and DCC’s response to those comments.

## 2. Stakeholder Engagement

This section details DCC’s stakeholder engagement that has taken place in relation to the draft November 2020 SVTAD.

On 29 April 2020, DCC presented at TAG an overview of the proposed context and contents of the SVTAD and the consultation. The consultation was drafted by DCC following several meetings with BEIS during April and May 2020.

The consultation document entitled ‘November 2020 SEC Variation Testing Approach Document’ was published on the DCC Website and DCC Customer Portal. DCC’s Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered the following matters:

- the draft November 2020 SVTAD; and
- draft text and proposed timescale for the Secretary of State’s direction for the designation for the November 2020 SVTAD.

Stakeholders were invited to respond by 16:00 on Wednesday 10 June 2020.

### 3. Consultation Questions & Respondents

The consultation presented two questions as set out in Table 1.

Number	Consultation Question
May 2020 SVTAD Q1	Do you agree with the proposed SVTAD for the November 2020 Release? Please indicate any areas of disagreement and the reasons for them.
May 2020 SVTAD Q2	Do you agree with the proposed designation date of 30 June 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the November 2020 SVTAD?

**Table 1 – Consultation Questions**

DCC received five written responses to this consultation. 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. Subject matter experts within DCC have reviewed every response. Where appropriate, DCC has engaged with respondents to discuss areas of disagreement to understand if an agreement may be reached consistent with Section N6.4 of the SEC.

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, as the regulation requirements require DCC to report on this.

#### 4.1. November 2020 SVTAD (May 2020 SVTAD Q1)

DCC sought views on the draft November 2020 SVTAD asking “***Do you agree with the proposed SVTAD for the November 2020 Release? Please indicate any areas of disagreement and the reasons for them***”.

##### 4.1.1. Respondent View

DCC received a response from five respondents:

- one respondent supported and agreed with the draft SVTAD with no further comments; and
- four respondents supported the draft but requested clarification on a few points outlined below.

**Scope of BEIS Q4 2020 Package.** In the November 2020 SVTAD consultation we stated that “there may be changes to the detailed scope of the BEIS Q4 2020 Package as the project to

implement it progresses and the Government will discuss any such changes with DCC. It may consequently be necessary for DCC to update the SEC Variation Testing Approach Document and/or the Testing Approach Document in accordance with the processes for the modification of those documents". One respondent questioned whether we needed to update the SVTAD or Testing Approach Document following any scope change.

Similarly, in the Release Notes of the [DUIS/MMC consultation](#) that DCC published in parallel to the SVTAD consultation, we mentioned an additional SMETS1, BEIS directed change (CR1045 extending the existing firmware update process to SMETS1 PPMID devices) that was not specifically written into the SVTAD. One respondent wanted to know whether there were changes to the scope and requested confirmation of the final scope.

DCC response: Since the consultations were published, the scope of the November 2020 SEC Release has changed. CR1045 extending the existing firmware update process to SMETS1 PPMID devices and CR1290 SMETS 1 DUIS Change - Re-Scaling of Gas Flow Rate in SRV 6.7 to match SMETS 2 have been removed. No further changes in scope are expected now. We can also confirm that, apart from minor updates, there is no need to update the SVTAD or Testing Approach following the reduction in scope.

**Mandated User Testing.** Section 2.2 of the consultation and 3.6 of the draft SVTAD detailed DCC's option to mandate User Testing. We stated that DCC's current view was that mandated testing would not be required. However, 3.6 of the SVTAD was drafted in such a way that catered for a change in that view.

Four respondents requested DCC to make a clearer statement on the status of mandated User Testing for November 2020 SEC Release.

Two respondents requested that, should mandated testing be introduced, Testing Participants be made aware of such change in plenty of time, so that they are able to plan appropriately for this testing. One respondent went on to say that, for future releases, the decision on the matter should be complete prior to SVTAD designation.

One respondent suggested that any DCC subsequent requirement for user testing before this release is live should be on a voluntary basis or a milestone re-plan for the live delivery should be considered.

One respondent also suggested drafting changes. They suggested the term 'including those users that are required to participate' should be changed to 'all relevant parties related to the user role for which such testing is required'.

DCC response: DCC does not plan to mandate user testing for the November 20 SEC Release. Section 3.6 was added to the SVTAD to facilitate a change to this position if it was considered necessary. It should be noted that should such a change be considered necessary, a proposal for mandated testing would be consulted upon by the DCC and it would only be mandatory, in respect of the BEIS Q4 2020 changes, if required by the Secretary of State. DCC acknowledges that Users would need to be given reasonable notice so that they can plan accordingly. We have also made amendments to the drafting to address the comment raised by one of the respondents. This is captured below in Section 5 Summary of Drafting Changes below.

#### **4.1.2. Areas of Disagreement**

There were no areas of disagreement.

## 4.2. Secretary of State Designation Date (May 2020 SVTAD Q2)

DCC sought views on the Secretary of State designating the SVTAD asking “***Do you agree with the proposed designation date of 30 June 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the November 2020 SVTAD?***”.

### 4.2.1. Respondent View

DCC received a response from all five respondents on the proposal for the Secretary of State to designate the SVTAD:

- three respondents supported the proposal with no further comments; and
- two respondents supported the proposed designation date but provided additional comments which are outlined below.

One respondent agreed with the date provided that DCC can meet the governance timelines without any compromise post the completion of consultation which they thought seems to be tight from a timeline perspective.

One respondent agreed with the date provided that the relevant drafting change they suggested could be addressed in time.

DCC response: We have made changes to the drafting to address the comment raised by one of the respondents.

### 4.2.2. Areas of Disagreement

There were no areas of disagreement with the date for designation.

## 5. Summary of Drafting Changes

The consultation process gave rise to a limited number of changes to the SVTAD (compared to the consultation documentation) which are detailed in this section. Additionally, there are a few minor drafting changes within the legal drafting to amend for typographical and referencing errors and improve clarity or process. Additionally, an overview of key changes to the SVTAD are provided in Table 2 below for information. Please note that the Clause references in Table 2 are based on the conclusion version attached to this document.

Drafting Reference	Description and Rationale for Change
Clause 1.1, 1.2, Table 1.1, 2.1, 3.2, 3.3, 3.5, 3.8, 4.1(b), and 4.4.	Amended to improve clarity.
Clause 3.2(j)	Clause reference amended.
Clause 3.4	Explicit requirement for DCC to comply with the November 2020 DCC Testing Approach Document added.
Clause 3.6	A new process for resolving disputes on device selection has been added.

Drafting Reference	Description and Rationale for Change
Clause 3.7	Drafting amended to reflect the comment on mandated user testing raised by one of the respondents.
Clause 3.7	A requirement to include the process for resolving testing disputes in the November 2020 Mandated User Testing Document has been added.
Clause 4.	Separated 3.10 onwards and created a new section on Test Completion.

**Table 2 - Overview of Drafting Changes**

## 6. Conclusions

DCC is confident that the revised draft SVTAD, submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has had appropriate consultation with industry regarding these changes to the 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 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 SVTAD revisions are in line with the overall solution design for the November 2020 SEC Release and other relevant documents.

DCC considers that:

- the revised SVTAD is defined to a sufficient level of detail for designation into the SEC;
- the revised SVTAD provides 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
- the revised SVTAD is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised SVTAD is fit for purpose.

## 7. Next Steps

DCC submitted this conclusions report to the Secretary of State on the date of publication.

Following the submission of the draft SVTAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to designate<sup>1</sup> the revised SVTAD into the regulatory framework utilising the draft direction text as presented in Attachment 1 of this conclusions report.

## **8. Attachments**

- Attachment 1 – SVTAD Draft Notification Text
- Attachment 2 - SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release (file name: November 2020 SVTAD – Final for BEIS Submission)
- Attachment 3 - SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release (change marked against consultation version) (file name: November 2020 SVTAD – Redline)

<sup>1</sup> NB Based on this consultation process, the earliest date that the SVTAD could be designated is 30 June 2020.

## **Attachment 1 - SVTAD Draft Notification Text**

This attachment contains the text that BEIS plans to use for direction of changes to the SVTAD.

### **SVTAD Draft Direction 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.*

*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 [DD MMM YYYY], the document set out in Annex [XX] in this direction is hereby designated for incorporation as the SEC Variation Test Approach Document for the November 2020 SEC Release and shall be incorporated into the SEC as Appendix XX in the form set out in Annex [XX] (respectively) to this direction.*

*Pursuant to Condition 22 of the DCC Licence and Section X5.6 of the SEC, the definition of "SEC Variation Testing Approach Documents" in Section A1 (Definitions) of the SEC is hereby amended by adding a comma after the words 'Appendix AJ', deleting the word 'and' prior to the words "Appendix AK" and adding the words "and Appendix [XX]" after the words "Appendix AK".*

*This direction is also being notified to the SEC Administrator.*

## Attachment 2 - SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release



November 2020  
SVTAD - Final for BEIS

## **Attachment 3 - SEC Variation Testing Approach Document for BEIS Changes included in the November 2020 SEC Release (change marked against consultation version)**



November 2020  
SVTAD - Redline.docx