Data Communications Company

DCC Consultation Response

Consultation on the Delivery Plan for DCC Release 2.0

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1. Introduction

On 16 July 2020, DCC issued a consultation to invite views on a new Release 2.0 plan. This was following a direction from BEIS under Licence Condition 13 of the DCC Licence.

The consultation sought views on a new Release 2.0 plan to replace elements of the existing plan relating to outstanding Release 2.0 content, including:

- the bulk availability for ordering of updated Single Band Communications Hubs in CSP North; and
- the bulk availability for ordering of Dual Band Communications Hubs in each of the CSP Regions.

The consultation closed on 30 July 2020 and in total 8 organisations responded, one of which was marked confidential. DCC have responded separately to the confidential respondent.

1.1. Structure of this document

The document comprises of the following sections:

- The questions that were asked, together with a summary of views of respondents and DCC's responses to these.
- Additional comments received and DCC responses to these.
- DCC's conclusions/next steps.
- Appendix A - DCC's proposed milestones.
- Appendix B – Dependencies, risks and issues
- Appendix C - DCC's plan on a page.

2. Feedback on changes to the R2.0 Plan

2.1. Responses to the consultation questions

Q1: Do you agree with the proposed milestone dates in Appendix A? Please provide a rationale for your views.

Stakeholder's response

All of the respondents agreed with the proposed milestone dates in Appendix A of the consultation document.

One respondent also understood the intent to reduce normal User Interface Testing (UIT) period for Single Band Communications Hubs (SBCHs), however noted that this should not be viewed as a precedent. The respondent noted that it is critical that industry can release this update

successfully and without customer impact. They also highlighted that being able to complete this before the winter period is crucial for consumers and planning.

Another respondent noted that there was little alternative to running concurrent UIT for SBCH and Over-the-Air (OTA) and Dual Band Communications Hub (DBCH) versions, however, this is not preferential.

Whilst another respondent agreed, they highlighted a risk to the decision in September for both Regions as they noted they are not due to receive 868MHz compatible devices until October, with piloting in mid-October. The respondent highlighted that they continue to accelerate delivery, however, a key risk is security approvals and therefore other suppliers will need to pilot if they have devices ready.

Another respondent noted that they were not aware that other milestones had previously been met, i.e. that the first batch of production DBCH had been made available in the Central and South Region on 20 February 2019.

DCC's response

DCC notes the risk of reduced and overlapping UIT windows and agrees that this is not preferential and should not become a precedent. DCC will continue to work with industry on options to mitigate risks associated with UIT across all of its programmes and will maintain regular engagement through test calls with DCC Users on future testing requirements.

DCC recognises the risk that sub-GHz meters will not be available for some Supplier Parties and has recorded this risk in the plan accordingly. DCC will continue to work with suppliers and Device Manufacturers to encourage availability and will also encourage DCC User to consider the use of 2.4GHz devices where practical.

DCC can confirm that the first batch of DBCH in the Central and South Region were made available in February 2019, however, this did not make full production. BEIS and industry were updated via the February 2019 Implementation Management Forum (IMF) and the Joint Industry Plan (JIP) was updated accordingly.

Q2: Do you agree with DCC's assessment of the risk, assumptions and dependencies in relation to the R2.0 revised delivery plan? Please provide a rationale for your views.

Stakeholder's response

The majority of respondents agreed with DCC's assessment of the risk, assumptions and dependencies.

One respondent understands that the inter-dependencies need to be managed, including any conflicts in testing due to either shortened testing window or clashes in testing timings across the programme. The respondent acknowledged limited availability of assets but suggested that, if possible, more could be made available to enable pilots. If this is not feasible, it should be prioritised to those who plan to pilot and are ready so industry can ensure the best findings and experience of the initial roll out for consumers. The respondent also noted that Risk 5 references

the issues found in SBCH and noted expectations that a similar approach is taken to DBCH. They believe it is essential that any potential consumer impacts are assessed and any solutions that could now or in the future negatively impact consumers are not rolled out.

Two respondents highlighted the assumption in relation to the availability of sub GHz gas meters, In-Home Displays (IHDs) and Pre-Payment Interface Devices (PPMIDs). Two respondents noted that it is unlikely that 868 MHz Gas Smart Metering Equipment (GSME) will be available. One of the respondents highlighted that their principal concerns are over 868MHz production proving activity, because of the dependency and risk of availability of devices. They noted that although DBCHs may be available in advance of DBCH compatible GSME, 'sign-off' on the operation capability of DBCH cannot occur without having an opportunity to deploy them into production in combination with 868MHz meters.

Whist agreeing with the dependencies outlined, one respondent also noted that DCC should not assume that the intended delivery/manufacture decisions can be made from piloting predominantly on 2.4GHz with limited pilot on 868MHz GSME testing.

One respondent questioned what is meant by manufacturing small volumes at first as outlined in the management strategy of Risk 1 in the consultation document. They questioned what quantities will be manufactured. The respondent also highlighted that Risk 4 should mention that as all suppliers are not able to test within all test phases simultaneously, some will not be able to submit material for the initial operational acceptance criteria. Therefore, not all device combinations will have been fully tested. The respondent then noted that the change from GBCS v2.0 for North Region DBCH will mean more testing requirements are placed on suppliers and this should be highlighted in Risk 7.

Another respondent highlighted concerns around the level of control and caution on the OTA of the R2 SBCH (North Region) firmware to existing Release 1 Communications Hubs. They noted that in their experience they are required to ask to have control over firmware deployment otherwise DCC will default to the hypercare process. They believe that having some involvement in, or even sight of, the DCC's deployment plan for when Communications Hub will be processed and a view of their progress against that plan would be useful. The respondent is therefore keen to ensure that there is a managed process as part of that/after that where there is closer monitoring of initial pilot OTAs for an extended period (e.g.+30 days). This is in order to gain some further assurance that there is no adverse impact on the installed customer base of the introduction of the Communications Hub firmware. This should then be followed by a controlled release plan with input from the relevant supplier.

DCC's response

In the original R2.0 plan, DCC planned to make available 2 pallets of DBCHs to industry, however, this has been increased to 4 pallets in the Central and South Region and 1 pallet in the North Region. DCC believes this will de-risk the low volumes. Whilst it was anticipated that this would be limited to 1 carton per ordering party, in the Central and South Region orders have seen 4 cartons being allocated to each supplier. DCC encourages customers to request additional cartons from DCC once allocation has been confirmed to suppliers and DCC will endeavour to fulfil additional cartons on a first come first serve basis.

DCC notes concerns in relation to the issues found in SBCH and the risk that similar issues could be experienced with DBCH. DCC will assess any consumer impacts and will continue to engage with industry with regards to the consumer.

DCC acknowledges that the availability of sub-GHz meters has become an issue and has updated the risk and dependencies (Appendix B of this document) to reflect this. DCC has removed the assumption as this has now become a dependency. At the July IMF meeting, BEIS and industry requested that DCC re-plan to coincide with availability of devices and DCC is therefore planning a revised approach to the Initial Installation Period. DCC is considering options and will communicate them through the appropriate forums.

With regards to queries in relation to small volumes of DBCH being produced at first, DCC notes that it has engaged with industry through the Supply Chain Working Group to reduce all Communications Hub orders due to Covid-19. This was implemented by SEC Modification Proposal MP130 'CH order and delivery changes due to Covid-19'. DCC will continue to consult with parties on their DBCH demand.

DCC notes that reduced device model combinations will be tested due to simultaneous test phases and has updated the risk, issues and dependencies (Appendix B of this document) to reflect this. DCC has also updated Risk 7 to note that the change from GBCS v2.0 for the North Region DBCH will mean more testing requirements are placed on suppliers.

DCC notes concerns around the level of control and caution on the OTA of SBCH in the North Region firmware to existing Release 1 Communications Hubs. DCC is preparing an intensive care plan which has been shared with BEIS and will be shared with industry at the August 2020 Common Issues Forum and SMDG.

2.2. Additional comments to consultation

One respondent had additional comments to the consultation. They noted that section 2 of the consultation document references to the fact that some milestones have been met. The respondent agrees that they have been met but highlighted that these have been met after the original planned date due to the reason outlined in the document.

The respondent also encourages that the delivery dates for Fylingdales are confirmed as soon as possible. They noted that this will enable any changes needed for Fylingdales to be managed and ensure it is not forgotten.

DCC's response

DCC acknowledges that whilst the first batch of DBCH have been made available in the Central and South Region, this milestone was met after the planned date in accordance with the original Release 2 delivery plan.

With regards to Fylingdales delivery dates, the high-level delivery dates were shared with IMF in May 2020. A further plan will be issued as part of the GBCS plan finalisation and will be communicated with industry through IMF.

3. Conclusions/Next Steps

DCC is of the opinion that it has had appropriate consultation with industry regarding the proposed content for a new Release 2.0 plan for the outstanding Release 2.0 elements. DCC has, where necessary, addressed the comments that have been received and where appropriate has sought additional feedback from respondents. DCC has made changes to the dependencies, risks and issues based on the comments received to this consultation.

It is DCC's view that it has met its Licence obligation to consult appropriately and to address the points raised. DCC is of the view that it has met its regulatory obligation as set out in the DCC Licence and that this conclusions document is fit for purpose.

DCC has submitted the R2.0 plan to the Secretary of State in accordance with Licence Condition 13.

Appendix A – Proposed Milestones

Milestone	Date	Description
R2.0 SBCH firmware available in the North Region	14/07/2020	This milestone is the remaining sub-component of the original LC13 R2.0 Code into Live Milestone and represents when DCC have made available the R2.0 Communications Hub firmware for SBCH in the North Region.
First Batch production DBCHs available for the North Region	24/08/2020	This milestone represents when the first initial batch of compliant production DBCHs in the North Region will be available.
Full volume production DBCH capability for the North Region	16/11/2020	This milestone represents the point at which DBCH can be delivered at full volume by the DCC in the North Region in accordance with the SEC (F5-F9)
Full volume production DBCH capability for the Central and South Region	26/11/2020	This milestone represents the point at which DBCH can be delivered at full volume by the DCC in the Central and South Region in accordance with the SEC (F5-F9)

Appendix B –Dependencies and Risk

Dependencies

Ref	Description	Impact	Management Strategy
1	Service User participation in UIT testing.	Inability to complete UIT, Operational Acceptance and upload to CPL.	Early and ongoing engagement with Service Users to encourage and facilitate their participation in UIT.
2	Service User participation in the DBCH Initial Installation Periods.	Reduced level of confidence to proceed to mass manufacture and shipping.	Early and ongoing engagement with Service Users to encourage and facilitate their participation in Initial Installation activities.
3	Availability of sub GHz gas meters, IHDs and PPMIDs in time for the DBCH Initial Installation Periods in the proposed plan.	Delay to DBCH rollout.	Proceed with DBCH delivery. Work with customers and device manufacturers to encourage availability. Encourage Service Users to consider use of 2.4 GHz devices where practical and until sub GHz devices are available. Availability of sub-GHz meters has now become an issue. DCC are planning a revised approach the Initial Installation Period to mitigate this issue but intend to maintain the same milestone dates for mass supply.

Risks and Issues

Ref	Description	Impact	Management Strategy
1.	There is a risk of lack of availability of sub-GHz meters IHDs and PMIDs by the industry for customers to install with the DBCH. Availability of sub-GHz meters in time for the Initial Installation Period has now become an issue.	Customers are unable to validate the DBCH in production. DCC may be unable to manufacture and supply full volumes of the product	DCC has exhaustively tested the DBCH and on this basis would proceed to manufacture the first palette as planned. For full volume, DCC will produce small numbers to begin with, ramping up to full volume supply over a period of 3-6 months as sub-GHz meters become available in the Industry. DCC are planning a revised approach the Initial Installation Period to mitigate the delay to availability of sub-GHz meters. However, it is intended to maintain the same milestone dates for mass supply.
2.	There is a risk that COVID-19 may cause a delay to the plan, particularly if there is a second lockdown or local lockdowns. Testing and development work may be impacted due to limited access to labs for UIT and to premises for the initial installation period.	Delay to implementation	DCC are continually monitoring and reporting on the impact of COVID-19. To date it has not had a detrimental impact to plans or delivery activity.
3.	There is a risk that other projects delivering in similar timescales may have an impact on R2.0 and could cause a delay in availability in testing environments. SMETS1 may place unforeseen constraints on this project.	Delay to implementation	DCC release and delivery strategy has been optimised in order to minimise the risk to R2.0 and all other releases. DCC will carefully manage inter - dependencies.

Ref	Description	Impact	Management Strategy
4.	There is a risk that multiple overlapping UIT phases will not be achievable for Parties.	Delay to implementation Not all Service Users may be able to test within the UIT period so fewer device combinations may be tested.	DCC is aware of the peak time for Parties UIT across four releases and continues to work on options to mitigate risks during this period. DCC acknowledges flexibility will be required by all Parties during this period and committed to working with DCC Users and partners in this regard. There is regular engagement through the twice weekly test calls with DCC Users on their test progress and risks.
5.	There is a risk of impact to the CSP North DBCH plan due to issues being observed on SBCH	Delay to implementation	The known PPMID compatibility issue observed on SBCH was confirmed in March IMF to be addressed via a mitigation added to the follow up FW release, planned for supply in March 2021 for DBCH. With regards to all other Single Band impacting issues, these have been discussed extensively and mitigation/solutions for these are planned for the next Dual Band Release.
6.	Delivery of first pallet in August in low volumes places increased risk on go live decision, and availability of enough DBCHs to understand trends or defects.	Delay to implementation	DCC is making available 4 pallets of DBCHs in the South and Central and 1 pallet of DBCHs in the North - a total of approximately 4,300 DBCHs. This is 2 pallets more than originally planned and will de-risk the low volumes. The likelihood of a critical defect is further de-risked by the 6-week customer UIT per DBCH manufacturer (EDMI WNC and Toshiba).

Ref	Description	Impact	Management Strategy
7.	GBCS 2.0 has a limited remaining lifespan in terms of IVP and confirmed delivery plans for GBCS v2.1 and 3.2 have not yet been presented.	Schedule impact Increased testing requirement on Supplier Parties	DCC and BEIS have established a fortnightly working group to review progress. DCC will propose to revise the GBCS 2.0 and GBCS 2.1 backstops and present a final plan at September IMF of what activities will be conducted when in order to inform a full re-plan for GBCS 2.1 and GBCS 3.2 delivery dates. Alongside this, DCC will raise a SEC Modification for revision of the IVP and MVP dates for CHTS1.1 (GBCS2.0 backstop) and CHTS1.1 (GBCS2.1 backstop) recognising the current date will not be able to be met across all CSPs and products as it stands. A separate CR will then be raised to reflect the revised GBCS 2.1 and GBCS 3.2 compliant firmware release dates.

Appendix C – Plan on a Page