

DCC Consultation Response

Consultation on changes to
CTSD and ETAD for November
2020 SEC Release

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1. Introduction

On 7 July 2020, DCC issued a consultation to invite views on proposed amendments to the Common Test Scenarios Document (CTSD) and Enduring Testing Approach Document (ETAD) for the November 2020 SEC Release.

The consultation closed on 5 August 2020 and in total 7 organisations responded.

1.1. Structure of this document

This 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.
- DCC's conclusions/next steps.

2. Feedback changes to CTSD and ETAD

2.1. Responses to consultation questions

Q1: Overall, do you support the proposed amendments to the CTSD summarised in this consultation? If you do not, please provide a rationale for your answer.

Stakeholder's response

All of the respondents agreed with the proposed amendments to the CTSD overall. However, some respondents had some queries they requested DCC to address.

Firstly, one respondent noted that the consultation document referred to changes in section 2.2.1 and 2.2.2, which is not captured in the CTSD documents. The respondent also noted that section 5.2.2 to 5.2.7 in the CTSD refers to the ability for Test Participants (TPs) to descope the Service Request (SRs) of their choice based on DCC's agreement and will not be able to use them in production without performing Service Request testing for the same. The respondent noted the following clarifications:

1. Does DCC have any mechanism to stop TPs from sending out SRs which they have descope and are yet to perform Eligibility Tests?
2. If not, will this cause any disruption to the production services where the TP might be sending descope SRs in the incorrect format as they have not performed Eligibility Testing where the issues would have been identified?

Another respondent noted, upon review of the timelines detailed in table 1 (UEPT Procedural Step), that a Supplier notifies DCC of its intention to undertake UEPT 60 Working Days prior to test commencement. They also noted that row 5.6.1.5 of that table describes Supplier Submission of a test plan, including all SRs, CV and responses a TP is proposing to descope. Row 5.6.1.6 details DCC's response at 20 Working Days which includes DCC's acceptance or rejection of the

TPs descope proposal. The respondent considers that a 20 Working Day period for a TP to review its test planning and preparation is insufficient, and the descope proposal and DCC's subsequent acceptance or rejection should be earlier in the UEPT process. The respondent also noted that the proposed process has no appeals procedure. The respondent considers that the process should be supported by a formal appeal process and the process detailed in the CTSD changes for acceptance or rejection of a TP descope at 20 Working Days prior to test commencement further enhances this view.

The respondent also highlighted that the CTSD does not detail how the production environment would be monitored in order to ensure compliance of DCC Users not sending SRs or CVs; for which it has not passed UEPT or Additional SR Testing. Equally, the respondent noted that the document does not detail the implications to DCC Users who may inadvertently breach this agreement.

The same respondent noted that any risk to the production environment, perceived or actual, from a DCC User sending SRs or CV variants for which it has not passed UEPT or Additional SR Testing, was not addressed in the consultation.

Another respondent noted concerns in relation to 'non-tested' SRs (whether because they are descope or are not included in Additional SR Testing) entering the DCC Total Systems, creating risk for other DCC Users. The respondent requested more detail on how the results from the Descoping of Tests, and Additional SR Testing, can be monitored effectively in the production environment.

DCC's response

DCC confirms that the reference to 2.2.1 and 2.2.2 in the consultation document was a typographical error and there are no changes to this section.

DCC considers that the changes to the CTSD do not introduce additional risk as there has always been a minor risk that DCC Users could send a SR that they were not eligible to send in production. This is because where new SR functionality is introduced post a DCC User completing UEPT, the DCC User could access that functionality in Production, even where it is not eligible to do so as it has not yet completed additional testing that was required. In accordance with recent changes made to Section G6 of the SEC, DCC Users need to set Anomaly Detection Thresholds (ADT) for Critical SRs to zero that they are not eligible to send. DCC also notes that there is a SEC Obligation¹ for DCC Users not to send SRs in production where they are not eligible to do so.

DCC agrees with the concerns stating that providing the descope from UEPT in the test plan may not provide TPs enough time to prepare if their suggested scope is not agreed. DCC has therefore amended the CTSD so TPs shall, alongside their notification of undertaking UEPT, provide the test scope and rationale for descope. This can then be discussed in the initiation meeting and reconfirmed in the test plan. DCC can then give an initial view of whether descope would be acceptable or not, which should allow discussion to complete ahead of the test plan being submitted. DCC also recommends that any TPs requiring to descope elements of UEPT, discuss this with DCC prior to notifying to avoid any delays to UEPT.

DCC notes that all SEC Releases will always be delivered in production after successfully completing System Integration Testing (SIT) and all associated go live governance. Additional SR

¹ SEC Section H1.3

Testing allows TPs to take up new functionality, that is already available in the production environment, based on when it is suitable for their organisation to do so.

DCC considers that where the DCC and TP do not agree on any individual or group of tests proposed for descoping, there shall be an appeals process. DCC has therefore expanded the existing appeals in the CTSD to require the TP to refer the matter to the SEC Panel for determination. The SEC Panel's decision on what tests may be descoped shall then be final.

Q2: Do you support the proposal that Test Participants should submit any proposed descoping of tests of the DCC, and that where DCC reasonable considers that the proposed descoping does not fulfil a minimum set required for a User Role, DCC may withhold the ability to descope? If you do not, please provide a rationale for your answer.

Stakeholder's response

All of the respondents supported the proposal that TPs should submit any proposed descoping of tests to the DCC, and that where DCC reasonable considers that the proposed descoping does not fulfil a minimum set required for a User Role, DCC may withhold the ability to descope.

One respondent noted that new TPs should not have to complete tests for non-mandatory services they do not currently intend to use. Regarding the change for new DCC Users to be able to descope tests where they are not using a service, the respondent believes that there are obligations being introduced to ensure DCC Users set threshold detection to zero for SRs they are not authorised to use. The respondent welcomed this requirement as it enables traceability of users that breach a condition not to use SRs for which they have not gained test completion certificates.

One respondent also agreed with DCC's ability to withhold descoping if the proposal does not fulfil a minimal set required for a User Role. However, the respondent noted that the changes to the CTSD does not define a minimal subset for each User Role, nor do the changes detail the process to be used by the DCC in approving or rejecting descoping proposals. Therefore, such approval or rejection may become subjective. Two respondents also considered that DCC should agree a minimum set of testing for each User Role with industry via the SEC Testing Advisory Group (TAG). They noted that any requests falling outside these predefined sets should be agreed with TAG prior to DCC issuing or refusing permission. One respondent recognised that this may introduce a short delay to the TP beginning testing, though this may mitigate by allowing the TP to test against its proposed set while a decision is being reached.

One respondent requested clarity that no SEC Party will be allowed to use DCC's Services unless it has passed Self Service Interface (SSI) Testing. The respondent considered that this is the intent, and certainly matches the current situation, but requested a clear statement to that effect included in the document.

DCC's response

DCC notes that as highlighted by the respondent and as set out earlier, a DCC User would need to set Anomaly Detection Thresholds (ADT) for Critical SRs to zero that they are not eligible to send.

As previously mentioned, DCC considers that where the DCC and TP do not agree on any individual or group of tests proposed for descoping, there shall be an appeals process. Consequently, DCC has amended the existing appeals in the CTSD to state that referrals may be submitted to the SEC Panel for final determination.

DCC confirms the intent is that Parties would not to be able to descope SSI testing from UEPT. DCC has updated the CTSD to make this clearer within the drafting.

Q3: Overall, do you support the proposed amendments to the ETAD summarised in this consultation? If you do not, please provide a rationale for your answer.

Stakeholder's response

All of the respondents agreed and supported the proposed amendments to the ETAD.

One respondent requested clarification as to why "emulators" have been added to the ETAD rather than replacing stubs. They noted that TAG had discussed this previously and concluded that there should be no reason to use "stubs" in the future.

Furthermore, two respondents requested clarification in relation to the assurance of emulators. One respondent requested clarity that any emulators used for such testing must have achieved ZigBee certification and have been approved by both the DCC's Testing Assurance Board (TAB) and SEC TAG. Another respondent noted that it is unclear whether details of emulator's assurance and/or certification will be made available.

DCC's response

DCC notes that any emulators provided to TPs will need to have completed SIT and the SIT governance first. DCC confirms that its preferred approach is to use and provide meters rather than emulators. Emulators are only used when meters that have functionality to support testing are not available. DCC confirms that it does not intend to use stubs with UIT, however the wording has been kept retaining flexibility in case a situation arises in the future where stubs may be necessary.

DCC can also confirm that emulators used within UIT will have gone through SIT and SIT exit governance prior to being made available to TPs for use and therefore will have the appropriate assurance and/or certification.

Q4: Do you agree with the proposed re-designation date of 21 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the CTSD and ETAD?

Stakeholder's response

All of the respondents agreed with the proposed re-designation date.

DCC's response

DCC notes the responses.

3. DCC Next Steps

DCC has submitted the conclusions report and updated CTSD and ETAD to the Secretary of State. The documents have also been published alongside this consultation response on the [DCC Responses](#) page on the DCC Website.

Following the submission of the CTSD and ETAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised documents into the regulatory framework.