

SMETS1 Conclusions on Changes for FOC Testing

DCC Conclusions and Report to Secretary of State on
changes to the SEC Variation Testing Approach Document
for SMETS1 Services (SMETS1 SVTAD) for testing matters
related to FOC.

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1. Introduction and Context

The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process and also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the Smart Energy Code¹ (SEC) and the latest version (AK 5.0) was included in version 23.0 of the SEC on 7 October 2020.

On 8 October 2020, DCC issued a consultation² on changes to the SMETS1 SVTAD to support changes to the FOC delivery approach and associated milestones that form part of the Smart Metering Programme Joint Industry Plan (JIP) which were agreed at the SMDG meeting on 8 October 2020.

This document considers responses to this consultation consistent with the regulatory requirements for DCC to modify the SMETS1 SVTAD.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed revisions to the SMETS1 SVTAD.

On 8 October 2020, DCC published the consultation document titled '[SMETS1 Consultation on FOC Testing Changes](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered the following matters:

- [SEC Variation Testing Approach Document for SMETS1 Services AK 5.1 draft \(change marked against AK 5.0\)](#);
- draft text and proposed timescale for DCC to modify the SMETS1 SVTAD.

Stakeholders were invited to respond by 16:00 on Friday 23 October 2020 using a response template that was provided as part of the consultation.

3. Consultation Questions & Respondents

The [SMETS1 Consultation on FOC Testing - Response Template](#) presented the following consultation questions as set out in Table 1.

Number	Consultation Question
FOC TEST Q1	Do you agree with the proposed changes to the SMETS1 SVTAD to support the revised approach to delivery of the FOC primary release? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

¹ <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

² <https://www.smartdcc.co.uk/customer-hub/consultations/foc-testing/>

Number	Consultation Question
FOC TEST Q2	Do you agree with the proposed amendment of the SMETS1 SVTAD by the DCC on 6 November 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?

Table 1 – Consultation Questions

DCC received three written responses to this consultation which were provided to the Secretary of State once the consultation had closed. One stakeholder advised DCC that they didn't provide a written response as the changes had no impact.

4. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response. Where appropriate, DCC has engaged with respondents to discuss major areas of disagreement to understand if an agreement may be reached.

DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in 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. FOC Testing Changes (FOC TEST Q1)

DCC sought views on proposals to amend the SMETS1 SVTAD asking "***Do you agree with the proposed changes to the SMETS1 SVTAD to support the revised approach to delivery of the FOC primary release? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.***".

4.1.1. Respondent View

Three respondents provided a response to this question:

- one respondent indicated support for the revised approach and provided no further comment;
- one respondent indicated support for the revised approach and provided a further comment; and
- one respondent set out some concerns without explicitly indicating either: support for, or objection to, the revised approach.

One respondent expressed concern that only two DMCs were planned for testing the primary FOC release and indicated that they would prefer that three DMCs would be tested. The respondent stated that FOC appears to have more device specific behaviours where the DCC migration service is being tailored to suit the DMC's being used. DCC notes the concern raised by this respondent. The approach to test two DMCs in SIT for FOC was presented at TAG on 15 September 2020 and no objections were raised. Subsequently, this approach was captured in the

JIP CR for FOC that was agreed on 8 October 2020. Two DMCs were selected by DCC for SIT on the basis that DCC needs to prove both interoperability and migration for the two SMSOs currently in scope for FOC. This approach was proposed as it is DCC's view that testing one DMC from each SMSO meets the minimum requirement and allows for the earliest possible go live date for FOC in an economically efficient matter. The approach to selecting one DMC per SMSO is consistent with other cohorts. Thus, DCC considers that testing a third DMC for the FOC primary release would not provide material additional benefits. This respondent also expressed a view that DCC should be able to confirm the DMCs for testing in the FOC secondary release at this point. As set out in the consultation document, the approach to testing for the FOC secondary release has not yet been agreed. Should a further Migration Test Phase and/or SIT Test Phase for the FOC secondary release be required, DCC will then set out which FOC DMCs it considers ought to be used in that testing. The purpose of this consultation was to amend the SMETS1 SVTAD such that DCC was not precluded from putting a DMC through both DMCT and any Migration Test Phase/SIT Test Phase for a secondary release where it was considered necessary to do so to enable SMETS1 enrolment as soon as possible.

Two respondents raised concerns regarding the existing DMC de-selection process within Clause 13 of the SMETS1 SVTAD, with one suggesting it should be subject to approval by the TAG (rather than consultation) and the other suggesting DCC should engage with any impacted energy supplier in addition to engagement with the TAG. The governance of the DMC de-selection process (which was unchanged by this consultation) provides for DCC to make a de-selection decision following engagement with the TAG. Furthermore, DCC's decision is not absolute; it can be challenged as each Supplier Party has a right to refer the de-selection decision by DCC to the Secretary of State for determination.

4.1.2. Areas of Disagreement

DCC considers that the current DMC de-selection process provides stakeholders with appropriate engagement along with a right to raise any objection and a change is unnecessary.

4.2. DCC Regulatory Change (FOC TEST Q2)

DCC sought views on the planned date for DCC to modify the SMETS1 SVTAD asking "***Do you agree with the proposed amendment of the SMETS1 SVTAD by the DCC on 6 November 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?***".

4.2.1. Respondent View

Three respondents provided a response to this question.

The two respondents that supported the proposal agreed with the proposed schedule for amending the SMETS1 SVTAD.

One of the respondents that raised some concerns regarding the proposal raised no objections to the proposed schedule for amending the SMETS1 SVTAD.

4.2.2. Areas of Disagreement

None.

5. Summary of Drafting Changes

Whilst the consultation process gave rise to no material changes, there are a limited number of drafting changes (compared to the consultation version of the SMETS1 SVTAD) which are detailed in this section.

There are a few minor drafting changes within the legal drafting to amend typographical errors and improve clarity. Additionally, an overview of key changes is presented in Table 2 below. Please note that the Clause references in Table 2 are based on conclusion versions attached to this document.

No.	Reference	Description and Rationale for Change
1	Clause 1.3 Definitions	Definition of In-Scope DMCs corrected with 'or' replaced with 'and'.
2	Clause 13.5	Text added to start of the Clause to reinstate exclusion of MOC Secure as this is covered by Clauses 13.10 to 13.12.
3	Clause 13.9	Reference to Clause 13.5 (b) amended to align to changed drafting in Clause 13.5.
4	Clause 20.2 (a)	'MOC' changed to 'MOC SIT DMC' to align to the updated definition.
5	Clause 20.2A	Slight redrafting to improve clarity.

Table 2 – Drafting Changes

6. Conclusions

DCC intends to amend the SMETS1 SVTAD with the changes proposed for FOC testing given the responses received.

DCC is confident that the revised SMETS1 SVTAD reflects the requirements for document submission.

DCC is of the opinion that it has had appropriate consultation with industry regarding these changes to the SMETS1 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 SMETS1 SVTAD and as such further consultation is neither necessary nor appropriate.

The SMETS1 SVTAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised SMETS1 SVTAD is defined to a sufficient level of detail for amendment into the SEC by DCC;

- the revised SMETS1 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 SMETS1 SVTAD is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised SMETS1 SVTAD is fit for purpose.

7. Next Steps

DCC submitted the SMETS1 SVTAD and this conclusions report to the Secretary of State on 29 October 2020.

DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the SMETS1 SVTAD. 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 on 6 November 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	Title
1.	SMETS1 SVTAD AK 6.0 – clean version
2.	SMETS1 SVTAD AK 6.0 – delta against consultation version AK 5.1
3.	SMETS1 SVTAD AK 6.0 – delta against current version AK 5.0

Table 3 - Attachments