



Conclusions

On the draft SEC Variation Testing Approach Document for the Enduring Change of Supplier (ECoS) Arrangements

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1. Introduction

1.1. Executive summary

1. Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the Smart Energy Code (SEC), the Secretary of State has directed DCC to develop and provide, for submission to the Secretary of State, a draft SEC Variation Testing Approach Document (SVTAD) in respect of variations to the SEC to deliver Enduring Change of Supplier (ECoS) Arrangements, following consultation with SEC Parties.
2. This document forms the DCC's submission of the draft ECoS SVTAD to the Secretary of State for incorporation into the Smart Energy Code (SEC).
3. The SVTAD for ECoS is a high-level framework for testing arrangements and requires the production of a Testing Approach Document (TAD), to contain the detailed testing approach and to be developed by DCC.
4. DCC issued a consultation seeking views on the proposal for the draft SVTAD for the ECoS arrangements. The consultation also sought views, on behalf of the Secretary of State, on the date for designation of the SVTAD which would bring it into legal effect. DCC's consultation was issued on 14 April 2021 and closed on 14 May 2021.
5. DCC confirms that, in accordance with Section X11 of the SEC, it has consulted on the draft ECoS SVTAD and is submitting this draft, including the reasons why DCC considers the draft to be fit for purpose. DCC can further confirm that it has taken into account consultation feedback and has amended the draft ECoS SVTAD where we support the views offered by respondents. We consider it to be defined to a sufficient level of detail for incorporation into the SEC.
6. DCC is including within this document the conclusions it has reached in respect of the consultation questions it asked regarding the ECoS SVTAD in order to provide stakeholders with a complete response.

1.2. Background

7. The ECoS arrangements are changes to the process that DCC follows when a consumer changes energy supplier and the new energy supplier seeks to take over control of the Smart Meter and other Devices in the consumer's premises.
8. When a gas or electricity consumer with a Smart Meter switches energy supplier, the security information held on the Smart Meter needs to be changed so that it relates to the new energy supplier and not the old one. The processes that are currently in place for managing the change of security information held on the Smart Meters are referred to as the "Transitional Change of Supplier (TCoS) processes and they are administered by a part of the DCC Systems known as the "Change of Supplier Party" (CoS Party).
9. As their name suggests, the existing TCoS processes were intended to be temporary. Changes to replace the existing TCoS arrangements to the enduring solution are already underway. Following a direction issued by the Secretary of State under Condition 13A of the DCC licence, on 1 August 2019, DCC published a consultation on its draft plan for the delivery of the ECoS arrangements. Following that consultation, the Secretary of State approved the plan on 30 March 2020.

2. Feedback on the Draft ECoS SVTAD

2.1. Consultation questions on the Draft ECoS SVTAD

10. Within its consultation document, DCC asked industry to consider three questions. In total, four organisations responded to the Draft ECoS SVTAD, providing direct responses to some, or all the questions.
11. A summary of responses to the consultation questions and the DCC conclusions are provided below.

2.2. Question 1

Question 1

Do you agree with the proposed SVTAD for ECoS? Please indicate any areas of disagreement and the reasons for them.

2.3. Question 1 – Consultation response summary

12. There was broad agreement from all respondents with the proposed SVTAD for ECoS.
13. One respondent outlined that it agreed with the proposed SVTAD for ECoS, subject to any testing overhead being spread between different sizes and types of DCC Users, should ECoS Mandated User Testing be introduced. This respondent considered that if testing is to be mandated, the requirement should be spread appropriately between Mid-Tier and Large Supplier Parties, and clearly be documented in any ECoS Mandated User Testing Document.
14. Another respondent suggested that any additional User Testing obligations that the SVTAD allows for, have a timebound period of notification to DCC Users. They consider that any obligation must allow a reasonable time period for Users to prepare for mandated testing with their own systems and potential Service Providers. A suggestion was made that a minimum notification period of three months prior to any go live date would be reasonable. This period should move with any DCC milestone replanning accordingly. The respondent did, however, agree that this should not be required if Users voluntarily make testing provisions.

2.4. Question 1 - DCC conclusions

15. As outlined in the consultation cover document, DCC considers that User Testing will need to focus on Users' ability to successfully run Change of Supplier Update Security Credentials Service Requests (SRV 6.23) under the new ECoS arrangements. It is the DCC's expectation that Supplier Parties will wish to demonstrate this themselves, without the need to be mandated to do so.
16. In the unlikely situation that DCC considers that Mandated User Testing is required, prior to the implementation of the ECoS changes going live, DCC will set out its proposals for User testing in a draft ECoS Mandated User Testing Document, including those Users that should be required to participate in the testing and the User Role in which they are required to participate. This will include the approach to testing; the arrangements for test completion; the process for resolving test disputes; and notification of test completion. In that event DCC would also ensure that sufficient notice would be given to allow appropriate time for preparation.

17. Any ECoS Mandated User Testing implemented would first require consultation with the Testing Advisory Group, Parties and other relevant stakeholders, before submission of plans to the Secretary of State. If this unlikely situation should occur, we would make best endeavours to ensure that a range of Supplier Parties would participate in a robust, fair, and equitable manner.
18. DCC would greatly appreciate an early indication from Suppliers of their intention to participate in ECoS testing in order to make an informed decision as to whether mandated testing might be required.
19. DCC agrees that any obligation placed on Users should allow for a reasonable time for those Users to prepare for mandated testing (should it need to be introduced) with their own systems and potential Service Providers. DCC notes that Clause 3.11 of the Draft ECoS SVTAD states that *"Each Supplier Party shall, where and to the extent reasonably requested by the DCC, provide information to the DCC relating to whether it intends to carry out testing if its User Systems..."*. In order to allow sufficient time for Users to prepare for any mandated testing that might be introduced, our proposal is that DCC will seek an early indication from Users whether and when they plan to test, six months before the User testing window is due to start.
20. This early indication combined with reporting on the use of XML signing certificate within the production environment will allow DCC to make an informed decision on whether mandated testing is needed. This, in turn, will provide sufficient time to develop a Mandated User Testing Approach Document and have that in place at least three months before User Integration Testing commences.

2.5. Question 2

Question 1

Do you agree that the ECoS TAD should also be capable of setting out the testing approach that is required to support any SEC Modifications that are implemented at the same time as the SEC variations for the ECoS Arrangements? Please indicate any areas of disagreement and the reasons for them.

2.6. Question 2 – Consultation response summary

21. Two respondents agreed with the overall proposal in the ECoS SVTAD consultation and did not provide further comment on this question. Two respondents did provide a direct response to this question.
22. One respondent was concerned about the proposal for the ECoS TAD to also incorporate the testing approach for other SEC Modifications that will be implemented at the same time as ECoS. This concern is based on the proposed approach reducing the clarity around the test approach, especially as the single document will be subject to two different governance regimes. It considers that when adding in the potential for changes to the dates of implementation of the SEC Modifications, then there is a risk that the TAD will require constant updating and subsequently there will be an associated risk to the required depth and breadth of testing.

23. Another respondent outlined that they would support DCC applying a single TAD approach, if ECoS testing coverage is independent. For example, removal of functionality relating to another SEC Modification should not remove the ability to meet an agreed ECoS test criteria item. They outlined that a single TAD should only be drafted with this separation in mind.

2.7. Question 2 - DCC conclusions

24. DCC's intention was that it would be economic and efficient for the ECoS TAD to be capable of setting out the testing approach to support any SEC Modifications that are implemented at the same time. We considered that this approach could also provide customers with a consistent and convenient approach allowing for easy access, in one place, to all necessary tests required for these wider changes, within a consolidated TAD and supporting documents.
25. Having reflected on the consultation responses, DCC agrees with the feedback that if the ECoS TAD also sets out the testing approach that is required to support any concurrent SEC Modifications, this could cause confusion.
26. DCC is now proposing that the ECoS TAD should remain separate.
27. DCC also agrees with the consultation response that a combined TAD could further complicate matters depending on the timings and different governance approvals, required at different stages, including the incorporation of feedback from those governance steps. We agree that this could lead to complicated version and change control management and could potentially cause confusion for DCC's customers.
28. We also note that the Delivery plan for ECoS approved by the Secretary of State under the DCC's Licence Condition 13A contains an ECoS Go Live date of June 2022. However, we acknowledge that a full end-to-end ECoS plan review will need to be undertaken at the end of June 2021, following the onboarding of all contracted parties. Any agreed move of the June 2022 go live date for ECoS, could then make coordination of a single TAD with SEC Modifications in the June 2022 SEC Release complicated.
29. DCC intends to keep the ECoS TAD document separate and will therefore produce a further TAD that covers SEC Modifications in scope of the June 2022 SEC Release. DCC will ensure that any TAD for a SEC Release containing 'prerequisite' deliverables required for ECoS, for example DUIS versions, are aligned to the ECoS TAD. In addition, the ECoS TAD will revisit any such deliverables to ensure that they are either regression tested and/or part of the full functional testing required to assure that the ECoS solution works in its entirety.

2.8. Question 3

Question 1

Do you agree with the proposed designation date of 11 June 2021 for the SVTAD for ECoS (or, if necessary, as soon as reasonably practicable within one month thereafter)?

2.9. Question 3 – Consultation response summary

30. Two respondents agreed fully with the proposed designation date of 11 June 2021 for the SVTAD for ECoS (or, if necessary, as soon as reasonably practicable within one month thereafter).
31. One respondent provided this agreement if it gives the DCC sufficient time to consider and act on any feedback received through the consultation process.
32. The final respondent noted that to date, the DCC Users and Device Manufactures are awaiting DCC to issue ECoS guidance documents. As testing should always be tailored to design and delivery requirements, they requested that any designation is not carried out until the ECoS guidance documents have been provided. The rationale for this comment is that this consultation still has uncertainties around testing deliverables and potential mandated requirements on parties that may rely on guidance documents. This should not be an issue as the delivery of guidance documents has been discussed at the Technical and Business Design Group and other forums with a suggested target delivery between June and July 2021, which would be in line with the suggested designation dates.

2.10. Question 3 – DCC conclusions

33. DCC considers that we have had sufficient time to consider and act on the feedback received through the consultation process and we agree with the proposed designation date of 11 June 2021 for the SVTAD for ECoS (or, if necessary, as soon as reasonably practicable within one month thereafter).
34. DCC also notes that testing should always be tailored to design and delivery requirements. We agree with the comment that any designation should not be carried out until the ECoS guidance documents have been provided by DCC. DCC will ensure that all relevant ECoS guidance documents have been provided, with sufficient time for the consideration and approval of the final ECoS TAD.
35. We do however note that the SVTAD is the high-level framework for testing to be included in the SEC that requires the production of the TAD to contain the detailed testing approach. We therefore do not consider this to be an issue for the 11 June 2021 designation date for the ECoS SVTAD.

3. Other suggested additions to the Draft ECoS SVTAD

36. DCC is suggesting two changes to the ECoS SVTAD outside the scope of the consultation.
37. Based on lessons learned from other DCC Programmes, we are recommending the inclusion of a clause in the ECoS SVTAD to allow the DCC to amend the ECoS SVTAD without external consultation or approval, where those changes are minor or inconsequential for Parties.

38. We consider that this will avoid lengthy and unnecessary delays where the wording in the ECoS SVTAD needs amending because of a minor typographical nature or has no material impact on the rights and obligations of Parties.
39. We have included a new clause (now clause 2.8) to the ECoS SVTAD that states:
- “The ECoS SVTAD may be modified by DCC without consultation where the modification is of a minor typographical nature, or does not have any material effect on the rights or obligations of SEC Parties or any other person who is entitled to undertake testing in accordance with this document.”*
40. We have also included a new clause (now clause 2.6) that provides for DCC to revise the ECoS TAD in accordance with any request to do so made by the Secretary of State:
- “The ECoS Testing Approach Document shall be modified by the DCC in accordance with any direction to do so made by the Secretary of State. Any such modifications shall be submitted by the DCC to the TAG for agreement in accordance with the provisions of Clause 3.3, and the provisions of Clause 3.4 shall apply (again) to the revised version of the document”.*

4. Conclusions on the Draft ECoS SVTAD

41. DCC is grateful for the responses received on the ECoS SVTAD consultation. This consultation conclusion document forms part of the DCC’s submission to the Secretary of State for approval.

4.1. Why DCC considers the ECoS SVTAD to be fit for purpose

42. DCC is confident that the ECoS SVTAD submitted to the Secretary of State reflects, and where necessary, addresses the relevant comments made by respondents.
43. It is DCC’s view that it has met its regulatory obligation to consult with Parties and to address their points raised.
44. The ECoS SVTAD is in line with the overall solution design for ECoS and other relevant documents.
45. DCC considers that the ECoS SVTAD is defined to a sufficient level of detail for designation into the SEC. The document provides the overarching framework which sets out clearly and unambiguously Parties’ rights and obligations which are consistent / and aligned with the rest of draft SEC requirements in relation to ECoS.
46. It is DCC’s view that the document delivers the regulatory requirements specified in the SEC and the Licence, and is materially complete, and the content is technically accurate.

5. Next Steps

47. Following the submission of the ECoS SVTAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to incorporate this document into the SEC pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC (Incorporation of Certain Documents into this Code).
48. As outlined in the consultation, we expect this decision to be communicated by the Department for Business, Energy & Industrial Strategy on 11 June 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter).