



Consultation – SMETS1 Uplift Testing

A consultation on changes to the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) related to SMETS1 Uplift Testing

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1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems.

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 of the SEC was published on 30 July 2021 as v43.0.

This consultation covers changes to the SMETS1 SVTAD to support changes to streamline the approach to SMETS1 Uplift Testing.

2. SMETS1 Uplift Testing Changes

Following a DCC led consultation, the SMETS1 SVTAD was modified² on 3 April 2020 to introduce Clause 21 of the SMETS1 SVTAD. This new clause introduced a regime titled 'SMETS1 Uplift Testing' which enables a route for testing changes to the DCC Systems arising from an amendment to the SEC that are not being tested as part of MT/SIT for a Capability Release (IOC, MOC or FOC) or the DMCT Process. It should be noted that changes to the DCC Systems where there is no SEC change are subject only to internal DCC governance. There is a defined process set out in the SMETS1 SVTAD which prescribed how each SMETS1 Uplift Testing is governed as follows:

1. DCC develops a test approach document (against a set of requirements in Clause 21.3 of the SMETS1 SVTAD) to cover the changes that constitute an Uplift that are being delivered as part of the same release;
2. the test approach document is agreed between the Testing Advisory Group (TAG) and DCC (with the scope for referral to the Secretary of State where agreement is unable to be reached);
3. DCC is required to demonstrate that this testing is complete via a test completion report that is presented to an internal Test Assurance Board (TAB) within DCC and, if accepted, then approved by the TAG;
4. any disagreement between the TAG and DCC (either on the Test Approach Document or on test completion) may be referred to the Secretary of State for determination; and
5. the arrangements also provide for each final test completion report to be published on the DCC website (subject to redaction if required).

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

² <https://smartenergycodecompany.co.uk/latest-news/new-version-of-the-sec-implemented-update-to-the-smets1-svtad/>

The SMETS1 Uplift Testing regime has operated successfully over the last year, however, it is becoming increasingly apparent to DCC that the existing SMETS1 Uplift Testing regime is not economically efficient for all types of change and therefore is no longer fit for purpose. The current regime does not provide sufficient flexibility for DCC and TAG to adopt a proportionate approach to testing where the scope of the change is limited e.g. for the small change to adjust the time within the GT01 check from 24 hours to 72 hours as proposed within the Unblocking 1 consultation¹.

Accordingly, DCC is proposing that the regime for SMETS1 Uplift Testing is amended to mimic the process that applies where a Testing Issue arises via DMCT which requires both a change to the SEC and a change to the DCC Systems in order for it to be resolved. In essence this approach provides for a test approach to be proposed by DCC for agreement by the TAG.

There is a new Clause 21.2A which requires the existing regime to continue for any tranches of SMETS1 Uplift Testing where a SMETS1 Uplift DCC Testing Approach Document has been approved by the TAG prior to the date that the SMETS1 SVTAD is modified (presently planned for 16 September 2021 as set out below in Section 3). The testing approach for this proposed regime is captured by a new Clauses 21.2B and 21.2C of the SMETS1 SVTAD and mimics the equivalent drafting for the DMCT Process as per Clauses 20.23 and 20.24 of the SMETS1 SVTAD. The drafting in Clause 21.2B also allows DCC to seek the TAG's agreement to apply the new regime where a SMETS1 Uplift DCC Testing Approach Document has already been approved by the TAG. DCC considers that the proposed change ensures that transparency and control is retained through the requirement for DCC to engage with the TAG (consistent with any testing issue raised within the DMCT Process that also requires a SEC change). DCC discussed these proposals with the TAG on 28 July 2021 and the TAG expressed broad support for these amendments to the SMETS1 SVTAD.

Clause 21 of the SMETS1 SVTAD also provides the flexibility for User testing where required. In the situation that DCC considers that User testing is required in relation to a SMETS1 Uplift before the changes go live, DCC consults on a proposal for such testing and reports to the Secretary of State on its proposal and the consultation responses. User testing then becomes mandatory if so directed by the Secretary of State. DCC notes that such User testing has not been required since Clause 21 of the SMETS1 SVTAD was introduced. DCC does not currently foresee any requirement for User testing in relation to any SMETS1 Uplift. However, DCC considers it prudent to retain this option within the drafting Clause 21, in order to accommodate the unlikely event that a need for User testing arises in the future. Therefore, there are no changes proposed to these provisions related to User testing.

SMETS1 Uplift Testing Q1

Do you agree with the proposed changes to the SMETS1 SVTAD to streamline the approach to SMETS1 Uplift Testing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

3. Next Steps

To conclude on this consultation, DCC will take into account respondents' views, and prepare a conclusions report for the Department for Business, Energy and Industrial Strategy (BEIS)

¹ <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>

consistent with Clause 4.2 of the SMETS1 SVTAD. DCC is aiming to provide a conclusions report to BEIS no later than 9 September 2021.

The conclusions report will set out a summary of responses received and details on how DCC have addressed any concerns raised. Unless the Secretary of State directs otherwise, DCC is proposing to amend the SMETS1 SVTAD on 16 September 2021 pursuant to the provisions set out in Clause 4.2 of the SMETS1 SVTAD utilising the draft notification text presented in Attachment 1.

SMETS1 Uplift Testing Q2

Do you agree with the proposed amendment of the SMETS1 SVTAD by the DCC on 16 September 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?

4. How to Respond

Please provide responses in the attached template by 1600 on 2 September 2021 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

5. Attachments

| Attachment | Title |
|------------|--|
| 1 | Draft Notification Text on SMETS1 Uplift Testing Changes |
| 2 | Response Template |
| 3 | SMETS1 SVTAD AK 6.UT draft – delta against current version |

Table 1 - Attachments

Attachment 1

This attachment contains the text that DCC plans to use for notification of a change to the SMETS1 SVTAD.

SMETS1 SVTAD Draft Direction Text

Words and expressions used in this notification shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Clause 4.2 of SEC as Appendix AK – the SMETS1 SVTAD, DCC notifies that, with effect from [DD MMM YYYY] the SMETS1 SVTAD previously designated and incorporated into the SEC as Appendix AK is hereby modified in the form set out in Annex [AAA] of this notification.

For the avoidance of doubt such modification of the SMETS1 SVTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being approved, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).

This notification is also being sent to the SEC Administrator.