

Conclusion – SMETS1 Uplift Testing

A SMETS1 conclusion on a proposal by DCC to amend the approach to SMETS1 Uplift Testing as set out in the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD)

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Author: consultations@smartdcc.co.uk

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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 detailed technical and procedural requirements of the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The SMETS1 SVTAD is Appendix AK and the TMAD is Appendix AL of the Smart Energy Code¹ (SEC) and the latest version of the SEC was published on 1 September 2021 as v45.0.

On 5 August 2021, DCC consulted² on regulatory changes to the SMETS1 SVTAD to support changes to streamline the approach to SMETS1 Uplift Testing. The regime for SMETS1 Uplift Testing provides 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. The existing regime for SMETS1 Uplift Testing prescribes a series of formal steps to be followed, whereas the proposed amendment to the SMETS1 SVTAD allows for a test approach to be proposed by DCC for agreement by the TAG.

This document provides a response to that consultation consistent with the regulatory requirements for amending the SMETS1 SVTAD.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed regulatory changes.

As set out in the consultation document, DCC discussed these proposals with the TAG on 28 July 2021 (which was prior to the consultation being issued on 5 August 2021) and the TAG expressed broad support for these amendments to the SMETS1 SVTAD.

2.1. Questions

Table 1 below details the questions related to the proposed changes to the SMETS1 SVTAD that were presented in the public consultation.

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

² <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-smets1-uplift-testing/>

Table 1 – Consultation Questions

2.2. Responses

Stakeholders were invited to respond to the consultation issued on 5 August 2021 by 16:00 on Thursday 2 September 2021 using the response template³ that was provided.

DCC received a written response from six respondents regarding this consultation.

3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response.

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3.1. SMETS1 Uplift Testing Changes (SMETS1 Uplift Testing Q1)

DCC sought views on proposals to amend Clause 21 of the SMETS1 SVTAD asking: "*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.*".

3.1.1. Respondents Comments

All six respondents provided a supportive response to this question regarding the changes to streamline the approach to SMETS1 Uplift Testing without further comment.

One respondent asked how many additional SMETS1 Uplifts did DCC have planned. At present, DCC has one further SMETS1 Uplift confirmed (Uplift 3.1) but expects others to arise related to the maximising migration activities DCC is taking forward pursuant to Clauses 1.4 to 1.9 of the TMAD, similar to the recent 'Unblocking 1' consultation / conclusion⁴.

Two respondents flagged a typographical error in the new Clause 21.2B; there was a reference to Clause 21.1A which should be to Clause 21.2A. DCC agrees with this observation and the updated legal drafting does not include this typographical error.

3.1.2. Areas of Disagreement

There were no areas of disagreement with the changes proposed to the SMETS1 SVTAD related to streamlining the approach for SMETS1 Uplift Testing.

³ https://www.smartdcc.co.uk/media/6427/smets1_uplift_testing_response_template.docx

⁴ <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>
<https://www.smartdcc.co.uk/customer-engagement/smets1-conclusion-unblocking-1/>

3.2. Proposed Modification Date (SMETS1 Uplift Testing Q2)

DCC sought views on proposed dates (between 16 September 2021 and 16 October 2021) for DCC to amend the SMETS1 SVTAD as per Clause 4.2 of the SMETS1 SVTAD *“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?”*.

3.2.1. Respondents Comments

All six respondents agreed with the proposed dates for DCC to amend the SMETS1 SVTAD to introduce the changes to streamline the approach to SMETS1 Uplift Testing.

3.2.2. Areas of Disagreement

There were no outstanding areas of disagreement related to the approach for DCC to modify the SMETS1 SVTAD.

4. Summary of Drafting Changes

DCC has modified the date included in Clause 21.2A to align to the proposed modification date of 22 September 2021. Following legal review, there are some minor drafting amendments to the structure to provide additional clarity without amending the intended approach. Also, these structural changes have amended Clause 21.2B to remove the typographic error highlighted by a respondent (as per Section 3.1.1 above).

The SMETS1 SVTAD has been re-designated by BEIS as V7.0 after this consultation was published. Therefore, DCC has transposed the proposed changes related to SMETS1 Uplift Testing into V7.0 and the concluded version is V8.0 draft.

5. Conclusions

DCC intends to amend the SMETS1 SVTAD with the changes as attached to this conclusions document given the responses received.

Consistent with the requirements set out in Clause 4.2 of the SMETS1 SVTAD, DCC has undertaken appropriate consultation with stakeholders in relation to the proposed amendments to the SMETS1 SVTAD.

DCC is confident that the SMETS1 SVTAD submitted to the Secretary of State reflects the requirements for document submission. 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.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

The revised SMETS1 SVTAD is in line with the overall testing 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.

6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document.

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 22 September 2021 (and modify the date included in Clause 21.2A if this date is delayed) consistent with Attachment 1 of the consultation document⁵. 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.

7. Attachments

Attachment	Title
1	SMETS1 SVTAD v8.0 draft
2	SMETS1 SVTAD v8.0 draft delta against current version v7.0
3	SMETS1 SVTAD v8.0 draft delta against consultation version v6.UT NB this also shows the changes in Clause 20 made between v7.0 and v6.0 as redlined.

Table 2 - Attachments

⁵ https://www.smartdcc.co.uk/media/6426/smets1_uplift_testing_consultation_document.pdf