

# Conclusions

On the delivery plan for  
Network Evolution – Data  
Service Provider (DSP)  
Programme

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# 1. Executive Summary

## Context

The Data Service Provider (DSP) Programme is a Data Communications Company (DCC) set of sub-programmes that ensure continuity in the provision of DSP services. Today these services are provided under contract by a single provider and will require re-procurement in time for replacement services to commence. The existing DSP contract expires in October 2024 with an option for DCC to extend this to Oct 2025. DSP services are currently delivered by CGI and have been since 2013 when the DCC was first established. As such, this is a significant procurement exercise, and it is important that DCC manage the programme in a way that delivers the best outcome for our customers, with regards to our licence objectives to deliver an efficient and economical service.

On 29 January 2021 DCC was Directed by BEIS to produce an implementation plan for DSP. DCC published a draft plan consultation<sup>1</sup> for review and comment which opened on 10 September 2021 and closed on 8 October 2021. This document sets out DCC's conclusions on the plan following stakeholder feedback.

There are three separate sub-programmes that will ensure continuity in the provision of DSP Services, these are the Data System Programme, the System Integration (SI) Programme and DCC Service Management System (DSMS) Programme, all with separately identifiable milestones within our plan. The questions in our LC13B draft plan consultation largely focus on delivery of the Data System Programme, with further engagement set to commence on the System Integration and DSMS programmes in early 2022 as these evolve.

DCC received 6 responses to the consultation, from Energy Suppliers and an Energy Supplier trade body, a Distribution Network Operator, and a Device Manufacturer.

## Key Point Raised 1 - Planning

In our September consultation, DCC proposed that procurement would be complete, and contracts awarded for provision of the Data Systems Programme by May 2023 and that transition to the new service would be complete by March 2025. A very clear message from stakeholders that responded to the DSP LC13B consultation is that the proposed plan dates were overly ambitious, noting that other major DCC programmes have been impacted by delays in various stages. Stakeholders also suggested that DCC should consider utilising the option to extend the existing CGI contract for a further year until October 2025 now. The revised plans show the overall timelines moving to the right with the plan now completing in October 2025. Given that, at this stage, DCC has not defined the solution that will be implemented or the degree of change and complexity the programme will have to manage there is still significant uncertainty on the durations for the later phases of the plan and it is likely that these will be subject to change as the solution is defined. The last point for DCC to request that CGI extends the current contract is not until April 2024 and DCC will make the appropriate decision once the details of the proposed solution and implementation plan are firmed up during 2022 well in advance of this date.

<sup>1</sup> Consultation on the delivery plan for Network Evolution <https://www.smartdcc.co.uk/customer-engagement/consultation-on-the-delivery-plan-for-network-evolution-data-services-provider-1/>

Whilst overall timelines have been extended, DCC has amended its planning approach to include the option, of overlapping activities during which procurement, build & test, and transition can happen. This allows for the potential for multiple procurements to take place in parallel enabling procurement of more straight-forward, commodity services to be brought forward, where there is justification to do so. This is reflected within the Appendix A Plan on a Page (POAP). The dates selected within the milestone table identify the latest possible date for delivery of a particular activity, should the multiple workstream approach be adopted.

DCC's strategy is to move away from a black-box procurements of single capabilities in delivery of major change programmes. The DSP Data System programme intends to align to this strategy, recognising that any proposed solution will be evidenced through the HMT business case process and will only be taken forward if it proves to be the most appropriate option, delivering the greatest value for money to consumers. DCC's intent is to break the solution into three main capability categories which could be delivered independently in separate delivery workstreams. These are:

1. **Commodity Capabilities.** These are off the shelf products which are not specific to SMIP standards and includes capabilities such as connectivity, hosting and storage.
2. **Non SMIP Specific Capabilities.** This includes the underlying technologies that supports the platform such as database technology.
3. **SMIP Specific Capabilities.** This includes capabilities which deliver the requirements set out in the SEC such as security applications, message request processing, DUIS (DCC User Interface Specification), GBCS (GB Companion Specification) and anomaly detection.

This will allow DCC to develop a much more flexible solution which is in line with DCC's architecture strategy to remove proprietary, non-standards-based technology which has proved expensive to operate and maintain and adopt a global standard, open-source architecture.

In adopting this approach, DCC is seeking to deliver benefit to its customers more quickly by transitioning technologies which are not SMIP specific and are likely to have less impact on customers earlier in the plan, whilst recognising that the SMIP specific capabilities will take longer to procure and transition. DCC recognises that the specifics of these workstreams will need to be clearly defined as the procurement strategy is established and, at this stage, does not prescribe any particular solution.

During H1 of 2022, DCC will engage with customers on the proposed solution as well as the best way to implement and transition to it. This will inform the procurement, implementation and transition strategies and enable DCC to define the later stages of the plan with more confidence.

### **Key Point Raised 2 – Contingency**

Another key theme from several respondents relating to the DSP Data Services programme was that additional contingency should be added into the plan as a whole to avoid potential future issues with timing. These issues could include reforecasting of Joint Industry Plan (JIP) milestones and potential negative impacts to both DCC users or end customers in terms of costs or service provision.

DCC accept that the timelines appeared ambitious and have taken the advice of respondents to identify milestone dates that maintain contingency within the plan, while balancing against potential early delivery dependent on the procurement approach. This is demonstrated within our Appendix A POAP.

However, until the plan is finalised, and we've got to our preferred option, these timescales remain uncertain. We have put in control points within the plan to effectively manage any changes to the plan.

### **Key Point Raised 3 – Customer Engagement**

DCC made clear within our consultation that it is critical for the success of the wider DSP programme, for us to listen to the feedback from our customers and stakeholders and use this feedback to help shape our design and approach. Whilst stakeholders were largely supportive of our engagement proposals, it was also made clear that more detail is needed and additional engagement on specific topics is important to them.

As a result, DCC are currently developing our DSP Data Services engagement plan for the period leading up to approval of the DSP Outline Business Cases OBC(s), including additional detail on specific engagement with SEC Panel and SEC Sub Committees. We have also included a milestone to have engaged with industry on our Migration and Transition approach, at a high level, by 4 July 2022. This is ahead of the planned latest possible date for our SEC Panel Data Services OBC engagement. This engagement is also aligned to our planned consultation on the scope of regulatory changes required. As the plan is re-baselined at the control points, we will revisit the engagement plan to ensure there is complete alignment across the two and that all engagements are happening at the right time to help contribute to the appropriate decision points, such as OBC approval.

## 2. Introduction and Context

### 2.1. The Network Evolution Programme

4. The Network Evolution Programme (NEP) is a DCC initiative geared towards defining and delivering the organisation's future operating capability. It currently comprises four Programmes:
  - Network Evolution Communication Hubs & Networks (CH&N): Designing and procuring future-proof Communications Hubs & Networks. We require a technology with a longevity of at least 15 years so that the full benefit of CH assets' operational life is realised from the point of installation.
  - Network Evolution Data Service Provider (DSP): Designing and procuring data services which enable continuity of service beyond the lifetime of the existing services, considering customers' evolving business needs and exploring use of new technology to deliver better value. This is currently made up of three sub-programmes (Data Systems Programme, DSMS Programme and SI Programme).
  - Network Evolution Trust Service Provider (TSP): Procure a replacement or extension to the Smart Metering Key Infrastructure (SMKI) security service in a cost-effective way; and
  - Network Evolution Test Automation: Designing and implementing automated robotic testing of the SEC releases to achieve faster and lower-cost testing.

### 2.2. The Current Data Service Provider (DSP) Contract

5. The DSP services are currently delivered by CGI in line with a contract which was let in 2013 at the inception of the DCC. The initial term of the contract expired in Oct 2021 and DCC have secured an extension to the term of the contract until October 2024 with an option to extend for a further year until October 2025. The contract allows for a further two years of termination assistance to facilitate migration to a new service provider if required.

6. The DSP contract sets out a number of systems and services to be delivered:

#### **A - DSP Data Systems including;**

- a. Access & Security (including DCCKI & SMKI Certificate Repository)
- b. Management of industry asset / registration data
- c. Service Request Processing
- d. Service Response Processing
- e. Alerts Processing
- f. Anomaly Detection
- g. Audit Logs
- h. DCC Service User Administration
- i. Transitional Change of Supplier (CoS) process
- j. Interface and Gateway services including networks
- k. Hosting, application management and service management of the DCC data systems

**B - DCC Service Management System (DSMS)** - An IT Service Management System for use by DCC to manage its SMETS services. Includes hosting, application management and service management of the DSMS, including provision of the Self-Service Interface.

**C - A Systems Integration (SI) Service** – This includes:

- a. SI activities during the implementation phase of a project or programme.
  - b. SI activities in relation to the operational service.
  - c. SI activities supporting provision of an enduring testing service, including market entry testing and SMETS1 Pending Product Combination Testing (PPCT).
7. DCC will now procure the SI services as a single programme, not separately as Enduring and Programme SI as we detailed within our earlier consultation document. Our rationale for changing approach is that whilst our strategy for SI is still developing, it is a lower risk option to combine both SI workstreams at a programme level, however retaining the option to diverge at a later point, should that be the optimal way forward.

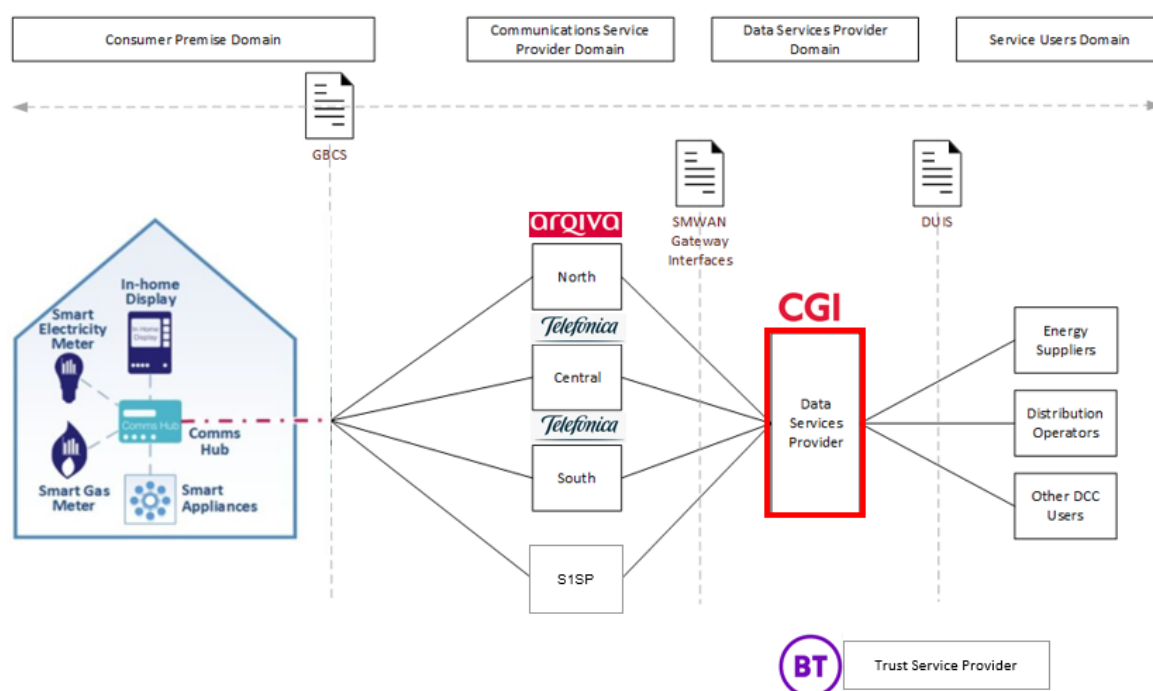


Figure 1. Role of Data Service Provider in DCC Total System

### 2.3. Secretary of State's Direction for the DSP Plan

8. On 29 January 2021 the DCC was Directed in accordance with Condition 13B of the DCC Licence to produce an implementation plan for two elements of the 'Network Evolution Arrangements', one for Communications Hubs and Networks and one for DSP. A copy of the direction is included within the earlier 'Consultation on the delivery plan for Network Evolution – Communications Hubs and Networks<sup>2</sup>'.
9. This document summarises the responses received to the 11 questions set out in the consultation, as well as other comments and feedback received, and DCC's conclusions in light of this feedback.

<sup>2</sup> <https://www.smartdcc.co.uk/customer-engagement/consultation-on-the-delivery-plan-for-network-evolution-communications-hubs-and-networks/>

It also sets out the changes to the plan DCC has made, as well as the final plans that DCC is submitting to the Secretary of State for approval alongside the publication of this document.

- **Section 3** of this document sets out responses received to the 11 questions asked, as well as DCC's conclusions in response to the feedback received.
- **Section 4** considers additional points raised by stakeholders which did not relate specifically to the questions asked, and DCC's response to them.
- **Section 5** summarises the changes to the plan that DCC has made in response to feedback.
- **Section 6** set out DCC's next steps in terms of plan delivery.
- **Appendix A** presents the plans on a page for Data Service Provider delivery.
- **Appendix B** includes the final set of Milestones that DCC is submitting to the Secretary of State in accordance with the Direction issued under Condition 13B of the DCC Licence.
- **Appendix C** contains an updated Lessons Learned for the DSP Data Services Programme.



### 3. Questions – feedback and DCC conclusions

10. DCC received 6 responses from stakeholders, comprising: 3 Energy Suppliers; 1 trade body representing some Energy Suppliers; 1 Distribution Network Operator and 1 Device Manufacturer.
11. We have summarised the key points made in relation to each question in the subsections of this chapter. Where respondents have made points, which are not directly related to the question posed, these are considered in Section 4 covering broader points raised. Where respondents have reiterated points across numerous questions, we have set out our response for the most relevant question, or in our response to broader points raised. Copies of all responses in full have been shared with the Secretary of State to inform their decision as to whether or not to approve DCC's plan.

#### 3.1. Planning /question 1

12. DCC set out that the DSP Programmes have been established to identify, procure, develop, and deliver continuity in the provision of data services and the key drivers for this activity are:
  - Driver 1 – Continuity of Service
  - Driver 2 – Service Improvements
  - Driver 3 – Deliver Future Change More Flexible and Cost Effectively
13. We identified that the programme is working with an assumption of existing DSP contract end date of October 2024, with a latest possible date of October 2025 (If we decide to exercise the option to extend the contract by a further year). In addition to this the current contract allows for up to two years of termination assistance beyond the contract end date to facilitate migration to a new service provider.
14. The programme will be following the Treasury Green Book guidelines; set out in a Strategic Outline Business Case (SOBC), developed into an Outline Business Case (OBC), and then confirmed in a Full Business Case (FBC). There are three programme phases:
  - Up to OBC Approval
  - OBC Approval to Contract Signature
  - Contract Signature to Programme Completion
15. The programme has already engaged industry/SEC Sub-committees, during the SOBC process, to identify the high-level business needs. The consultation made clear that options for delivery will remain open and be informed by our forthcoming Request for Information (RFI) and that during the development of the OBC DCC will continue to engage with SEC Parties to validate their business needs.
16. DCC proposed the option of further consultations with industry on the plan ahead of each stage, subject to BEIS approval. From time-to-time BEIS may seek views from SEC Panel in relation to key decision points in the programme.
17. And finally, DCC provided views on the proposed process for selecting a preferred option, which will involve SME analysis of the potential options, including any new options that are suggested during the RFI stage. Shortlist and preferred option(s) will be identified as part of the SOBC process and subsequently analysed through the OBC drafting.

### 3.1.1. Question 1

#### Question 1

Is there anything further that you would like us to consider within our planning activities? Please provide any details.

#### Response summary

18. A wide number of stakeholders that responded to this consultation suggested that the planning dates proposed were overly ambitious, noting that other major DCC programmes have been impacted by delays in the procurement and contract negotiation phases. A number of respondents additionally suggested that DCC should consider utilising the option now, to extend the existing CGI contract for a further year until October 2025.
19. A key theme from several respondents was that additional contingency should be added into the plan as a whole to avoid future issues with potential negative impacts to JIP milestones and DCC user costs/service. This is linked to feedback that detail of the planning was insufficient and difficult for stakeholders to validate.

#### DCC conclusions

20. DCC are taking the views provided by respondents into consideration whilst further defining the strategic delivery approach and the detailed plan.

### A - Planning Assumptions

21. DCC has revisited the plan and assessed alternative ways to potentially accelerate the delivery of the plan, taking into account views of respondents, our new planning assumptions are not overly ambitious but allow for earlier delivery. This exercise has allowed DCC to define a set of assumptions and principles which will be validated post RFI and during the build of the OBC, of which there may be multiple iterations for the plan workstreams. At this stage DCC will evidence the most suitable approach to progress the delivery of the programme. In the meantime, some of the potential planning principles are set out below:
  - a. Consider a delivery approach that allows for incremental delivery of capability (i.e., some standalone, simpler procurements could commence early whilst more complex and bespoke components are still being elaborated).
  - b. Evaluate overlapping windows of activity to procure, build & test, and transition to a new solution with the potential for multiple go-live/transition events.
  - c. Adopting the above 'window' of activities approach, the plan would include the last dates for completion of procurement, build, test and transition, noting that there may be multiple deliverables happening in parallel that ultimately conclude by the end of that window period.
22. In support of these planning principles, DCC is considering and planning for the option of pursuing three separate workstreams for the Data Systems Programme that sit within the windows of activity described above. These are the Commodity Capability workstream, the Non SMIP Specific Capability workstream and the SMIP Specific Capability workstreams, we explain these in more detail below:
  - a. **Commodity Capability.** These are off the shelf products which are not specific to SMIP standards and includes capabilities such as connectivity (Wholesale Connectivity Ethernet, MPLS – fixed WAN), hosting and storage (either on site or cloud based). These services will

only be procured on the assumption that new service contracts will not run alongside existing services for any longer than needed and will not constrain future development of the DSP. DCC can procure these services more rapidly on the assumption that these are non-SEC impacting services and have minimal impact on DCC users and customers, therefore allowing DCC to focus engagement and consultation on the other workstreams.

- b. **Non SMIP Specific Capability.** This includes the underlying technologies that supports the platform such as database technology. These are assumed to be non-SEC impacting; however, this will need to be confirmed. As this may impact DCC users DCC will therefore engage as this stage of the programme commences.
  - c. **SMIP Specific Capability.** This includes the underlying technologies that supports the platform such as database technology, DUIS, GBCS and anomaly detection. This is likely to impact the SEC DCC users, therefore engagement will be key as this stage of the programme evolves.
- 23. These workstreams are reflected with the Appendix A DSP POAP, but not within the Appendix B Licence Condition 13B Milestone Table. The POAP represents the opportunity to deliver programme value earlier, where this is supported through customer engagement, whilst the Milestone Table confirms that latest time that this programme activity could be delivered.
  - 24. Linked to this, there may need to be multiple OBC and FBC submissions. An OBC / FBC submission and sign off will be required for each procurement within each of the three workstreams of the programme.
  - 25. Following stakeholder feedback, DCC will consider exercising the extension option, extending the CGI contract for a further year until October 2025. DCC, with the correct regulatory approvals from BEIS, has until April 2024 to exercise this option and will take the decision to do so once the implementation plans are better understood later in 2022.
  - 26. DCC has also undertaken a granular review of all planned activities and reflecting on customer feedback has correspondingly reduced the risk appetite of this planning, with revised dates being consolidated within the revised POAP (Appendix A) and Milestone Plan (Appendix B). This includes using lessons learned from the ongoing DSP SOBC stage and gained further understanding from CH&N where engagement with BEIS and industry has taken longer than expected.
  - 27. Additional time has also been included for stakeholder engagement to support consolidation of business needs, and specifically the SEC Panel have requested more time for engagement on the migration approach. Whilst engagement is undertaken in parallel to other critical path activities, there is a critical path dependency on this engagement to complete and in advance of updating ITT artifacts prior to issue. During this period, DCC will also engage industry on the high-level approach to migration and transition, where feedback will be taken onboard ahead of SEC Panel engagement on the DSP Data Services OBC stages. Within the plan, our first control point 1 is scheduled following completion of our early options analysis and at the point when DCC will have a preferred way forward. This will allow DCC to engage with BEIS on any required replanning at the earliest possible time.
  - 28. A new milestone has been added to the plan to reflect when industry engagement will be completed for high level migration and transition approach.

## B - Introduction of additional Contingency

- 29. Until DCC have defined the proposed solution to procure and implement a new DSP, there are still a wide range of options of varying degrees of complexity which will drive similarly wide-

ranging plans. This uncertainty is being addressed by including checkpoints in the plans at strategic points to determine if the DCC should request direction from BEIS to update the plans. Until more is known about the solution, it is difficult to determine the amount of risk and contingency to incorporate into the plan. However, DCC has extended the overall timelines for the procurement, build & test, and transition activities in recognition of the comments received.

30. DCC has responded to stakeholder feedback in relation to lack of contingency by reassessing the plan and has put forward an approach to meeting this plan by separating the delivery of DSP into three workstreams, extending the procurement, build & test, and transition periods over longer, overlapping periods of time.

## C – Other Key Points Raised

31. One respondent noted that the DCC are currently reviewing our change processes and there was encouragement for the DSP Programme to reach out and understand this work to ensure that thinking is aligned. The DSP Programme will link in with the DCC Portfolio team in order to ensure there is alignment with any amendments to the change process and the impact, if any, it has on the business needs relating to how change is managed.
32. A number of respondents also cautioned on the timing for any complex technical upgrades during the winter period, as proposed within our original plan consultation. We recognise the additional risk to end consumers during this period, particularly for Pay As You Go (PAYG) consumers should there be problems or DSP outages. DCC has committed to engaging further with stakeholders on our migration and transition approach by July 2022, with this point being a key consideration and captured as a programme risk.

## 3.2. Requirements Gathering /question 2

33. DCC described the programme approach to requirements gathering for both the SEC and non-SEC service provision is to establish the ‘as-is’ requirements and then overlay the new / changed requirements. Initially, High Level Requirements (HLRs) for Service Provider contracts will be established, and these will then be decomposed into Detailed Level Requirements (DLRs). The Service Provider contract schedules will include traceability to the SEC (and REC, if required). New requirements will come from internal DCC workshops, assessment of industry needs through engagement and assessment of certain rejected modifications. Any changes to the SEC will be subject to an industry consultation.

### 3.2.1. Question 2

#### Question 2

**Are there any additional steps we need to take in relation to capturing proposed changes to the SEC that you would like us to consider?**

#### Response summary

34. Some respondents voiced a concern that DCC is assessing certain rejected modifications in isolation without further input from the wider industry. Similar views were also provided that more engagement with stakeholders would be needed in advance of making change, both within and outside of SEC governance.
35. A large number of respondents commented on the benefit of scalability in relation to system capacity and that future DSP contracts should better facilitate this. One respondent suggested that over delivering on existing requirements could avoid issues in the future, specifically relating

to capacity and congestion. Several respondents pointed to the likely increase in capacity requirements and increased in messaging in the future, citing the benefits of DNO voltage requirements in the short term, the introduction of smart grids and Market Wide Half Hourly Settlements (MHHS) in the medium term. Longer term government strategy was also cited: the government's Net Zero plans and initiatives.

36. Some respondents suggested that the DCC should plan to formally engage with industry stakeholders and DCC users on the contents of the forthcoming Request For Information (RFI) to ensure that requirements and insight are suitably captured.

### **DCC conclusions**

37. Our approach to assessing previously rejected modifications is to understand themes and any potential DSP constraints rather than look to implement new DSP functionality. DCC has included within its engagement plan, additional time to discuss with the SEC Panel and SEC Sub Committees the cost / benefit analysis related to any potential new requirement that are linked to the agreed set of Business Needs, this is a lesson we have learned from the CH&N programme.
38. Any new requirements for the future DSP service, that are different from the SEC or any other regulatory documents today, will be consulted on and customers engaged to support decision on whether such changes should be made. Decisions on whether to designate such changes to the SEC will rest with the Secretary of State, following consultation. DCC will issue a stakeholder consultation document, setting out high level scope of regulatory change needed for the introduction of DSP, in advance of publishing a high-level conclusions document in September 2022. Subsequently there will be consultation on the drafting of any SEC changes proposed. Further stakeholder engagement arrangements will be detailed at this point and engagement with stakeholders will run until October 2023 when DCC will confirm final proposals for all regulatory change.
39. A key business need identified, following engagement with industry stakeholders in 2020/21, is the delivery of DSP changes more flexibly and efficiently. This relates both to functional requirements and non-functional requirements such as the management of capacity. We will be exploring how this can be achieved through the RFI activity. Additionally, we have amended our plans to include further engagement with SEC Panel and the SEC Sub Committees, that will feed into the DSP Data Systems ITT work.
40. The additional capacity requirements for Market Wide Half Hourly Settlements (MHHS) will be managed and implemented within the existing DSP system under live modification MP162<sup>3</sup>, which is scheduled to be implemented in advance of any DSP transitional period. This will therefore be included as a requirement for any future DSP service arrangement.
41. To date, DCC has engaged with industry stakeholders on identification of business needs through customer 'pain points' workshops, webinars and with relevant SEC Sub Committees on multiple occasions. The output of this engagement on establishing business needs was the release of our DSP Data Systems RFI in December 2021. We do not believe that it would have been an efficient approach to delivering a future DSP service to have delayed this RFI for the purposes of additional stakeholder engagement on this topic. Stakeholder engagement is a key part of this programme and planned engagement will be developed further during 2022.

<sup>3</sup> MP162 SEC changes required to deliver MHHS <https://smartenergycodecompany.co.uk/modifications/sec-changes-required-to-deliver-mhhs/>

### 3.3. Test Strategy for DSP Replacement – ‘Shift Left’ /question 3

- 42. DCC set out that a high standard of testing is a programme objective and learning from previous delivery programmes DCC should balance prompt delivery against the need for thorough testing. To support this, DCC has proposed a ‘shift-left’ principle whereby we increase the breadth and depth of testing in PIT and SIT, using real devices to demonstrate fitness for purpose.
- 43. At this stage of the programme, the detailed design information is not available. As DCC engages with potential vendors and moves through the market engagement, procurement and contracting activities, a clearer view on the build, PIT and SIT activities will emerge. DCC has committed to updating this part of the plan in subsequent plan consultations.

#### 3.3.1. Question 3

##### Question 3

Do you support DCC’s shift-left strategy for testing, including that there are no obligations on DCC Users to undertake testing? If not, please explain why.

#### Response summary

- 44. Respondents were supportive of the DCC’s proposed shift-left approach strategy for testing. Respondents also noted the importance of comprehensive, rigorous planned testing and that assurance would be needed to ensure no detrimental impact to DCC Users or end consumers, given the importance of activities undertaken by the DCC.
- 45. There was wide support for increased volume of testing in the PIT/SIT phases along with the inclusion of physical devices, rather than emulators. Several respondents noted that engagement with DCC users and relevant SEC Sub Committees and Panel should be undertaken to agree the range and volume of devices included in the scope of testing.
- 46. A number of respondents highlighted the importance of including specific real world business processes and varying sequences of service requests within the testing scope. Examples of these processes included to Change of Supplier, Change of Tenancy, Mode Change, Tariff Updates, Installation and Commissioning, Meter Read Retrieval, and Firmware Deployment / Activation. This should also include testing to evaluate exception (unhappy path) scenarios.
- 47. The majority of respondents were supportive of the DCC question proposing that users should not be obliged to participate in the PIT/SIT testing. A number of respondents identified that this approach could create a risk with a lack of testing by DCC Users, potentially creating issues with interoperability and interchangeability.
- 48. Some respondents suggested that DCC should consider how system capacity testing can be integrated and completed as part of the programme testing approach. This is particularly important given the significant and increasing volume of smart meters that are supported by the DSP.
- 49. Some users identified that information and detail around the DCC testing approach was lacking at this time, however also recognised that the programme is at an early stage as the primary reason for this. It was also noted that legacy issues within the DSP should be identified to ensure that they are not replicated within the future DSP. These topics included the loss of northbound SRV responses, alert storm protection and HAN stability.

#### DCC conclusions



50. DCC fully agrees with views and comments from industry stakeholders that there needs to be a thorough, robust, and suitable testing regime in place for the DSP Programme. This will need to be underpinned by quality engagement with stakeholders and relevant industry groups to agree the breadth and scope of this regime.
51. We are pleased with the support from stakeholders in proposing use of physical devices in testing. DCC will engage with industry on this.
52. Whilst the majority of respondents were supportive of the DCC question that was proposing users should not be obliged to participate in the PIT/SIT testing, on reflection and further consideration of this topic, our question was premature. DCC needs to better understand the level of change required to implement new data services, which will then inform the degree of user testing needed. Therefore, we have chosen to defer this decision until later in the programme and will engage with stakeholders again on this point when more detail on testing proposals can be shared.
53. Stakeholder responses were supportive of the proposed 'shift left strategy', DCC will engage with users and relevant SEC forums to present a more detailed approach for validation to ensure the benefits are achieved. This approach will include varying sequences of service request processes and common industry scenarios from different users, for example change of supplier and change of tenancy. We will also include unhappy path / exception handling scenarios.
54. DCC fully accepts the criticality of both volume performance & capacity testing and transition & migration testing of the systems. A methodology for both aspects will be proposed, and the industry engaged, subject to evolution of the proposed architecture.
55. Legacy issues such as alert storm protection have been captured as requirements and should be within the design of the solution from the start.

### 3.4. Transition /question 4

56. DCC provided an early view of how we will approach the Transition arrangements and that logical and physical architectures will need to be defined before a specific transition arrangement can be consulted on. We explained that the main consideration for our developing this approach will be to minimise impact to DCC users and end consumers. We also listed our main considerations at this early stage.

#### 3.4.1. Question 4

##### Question 4

We would welcome any early views on important transition considerations from our Stakeholders? Please provide as much detail as possible.

#### Response summary

57. Respondents highlighted the need for clear information, and more detail on DCC proposals and planning to ensure that there is suitable understanding of potential impacts to DCC users and end consumers. Transition must be planned and executed efficiently to avoid significant issues and allow for flexibility if necessary. Some respondents felt that more detail could have been provided at this early stage.
58. Key information that respondents expect, includes the programme transition approach, migration planning, entry criteria and how this will fit into the wider programme timeline. Whilst

acknowledging that detail of the architecture would be needed before transition strategies can be fully defined, an earlier understanding of DCC's high level approach would be welcomed. Some respondents asked whether a Transition Approach Document is planned for this programme.

59. One respondent highlighted that defect and incident management throughout the programme needs to be clearly defined.

### **DCC conclusions**

60. DCC recognises the need for a robust, clear, well understood and well engaged transition and migration approach to mitigate any user risks. Developing an approach to minimise impact to DCC users and end consumers remains our main consideration and will be a guiding principle informing the detailed development and selection of Transition strategies and approaches.
61. We acknowledge that engagement and the views of stakeholders on this topic is important and therefore have introduced a new milestone into our plan, detailed within Appendix B. This new milestone 'Industry Engagement Complete - High Level Migration & Transition Approach', is proposed for the 4<sup>th</sup> of July 2022 as part of our wider engagement plan and will signify the point at which DCC will have completed engagement on our high level approach. This will feed into the conclusions of our regulatory change scoping document.
62. We agree with respondents that DCC will need to develop the detail and be specific on impacts to customers and consumers. Much of the detail being asked for by respondents is simply not available yet, however we plan to engage and share with stakeholders as it is developed. The DCC's preferred high-level approach will be confirmed as soon as the preferred target 'to-be' solution is selected in terms of architecture and commercial delivery model based on an underlying analysis of risks, costs, timescales, and other factors.
63. DCC is planning to develop formal transition strategy and approach documentation, which will be done in the next stage of the programme. This includes detailed migration planning and entry and exit criteria developed for each workstreams /phase of the transition including relevant quality criteria.

## **3.5. Lessons Learned /question 5**

64. DCC provided an outline of its initial Lessons Learned that can be applied to the DSP Programmes.

### **3.5.1. Question 5**

#### **Question 5**

**We would welcome comments on DCC's lessons learned. Are there any we have not listed, or lessons in the list which should be discounted?**

### **Response summary**

65. A number of respondents to this consultation question noted that lessons learned section of the consultation document was lacking detail and the content was too generic. Some respondents also suggested that the DCC should look more closely at both the CH&N and ECoS programmes in this respect.
66. Respondents also noted that there was a lack of prioritisation of the various lessons learned topics outlined and that it would be reasonable to rank these topics different factors, such as the



potential level of impact or likelihood. Some additional points were provided for DCC to consider for the programme lessons learned.

67. Some respondents suggest suggested that an independent Contract Review may provide benefit to the DSP Programme, potentially helping to address issues and problems within the existing DSP contracts. DCC could consider appointing an independent third-party review of the new DSP contracts ahead of approval.

### **DCC conclusions**

68. On reflection, DCC agrees with the comments and views provided by stakeholders in relation to this section of our DSP consultation. We have carefully considered suggestions by stakeholders and have included a snapshot of our updated lessons learned log within Appendix C of this consultation.
69. Whilst the evolving lessons learnt programme log is an internal artifact, we will continue to update through the engagement sessions planned from 2022 onwards and update as necessary.
70. Regarding the suggestion of appointing an independent organisation to undertake an independent review of the future DSP contract ahead of its approval, this is an option which will be considered during the next stage of the programme and a decision will be made on whether independent assurance is required beyond DCC's OPR regime.

## **3.6. Plan Interactions with other DCC and Industry change / question 6**

71. Within this section of our consultation, DCC set out the key changes in which DCC is involved and how we plan to manage any potential contention. This assessment included a review of SEC releases, independent programmes; Faster Switching, Market Wide Half-Hourly Settlement (MHHS), Enrolment of SMETs 1, Enduring Change of Supplier (ECoS) and the broader Network Evolution Programmes.
72. The key areas of concurrent activity in the plan we plan to actively manage are ECoS, MHHS and the enduring Trusted Service Provider (TSP) service under Network Evolution. We invited views on this assessment.

### **3.6.1. Question 6**

#### **Question 6**

**Do you agree with our assessment of external change which could impacted or be impacted by DSP delivery? Are there changes that we have not considered?**

### **Response summary**

73. The majority of respondents agreed with DCC's assessment of external change, which has the potential to impact or to be impacted by the DSP Data Systems programme.
74. Some additional areas were suggested for consideration by DCC as part of our ongoing assessment of external change. These include:
- a. That REC changes should be considered as there is the potential for cross code changes being raised.

- b. Contention with the NEP CH&N Programme. Some respondents question why the DCC assessment did not expect contention between the CH&N Programme and the DSP Programme, given that both programmes will be delivering activities in the 2023-2025 period, increasing the likelihood of shared requirements and objectives between the two.
- c. One respondent suggested that it is reasonable to assume the introduction of Market-wide Half Hourly Settlement (MHHS) will place additional capacity demands on the DSP in the medium to longer term. Additional funding for this known industry wide programme would be unacceptable for DCC Users, post implementation of a new DSP service.
- d. Some respondents suggested that DCC should consider the impact of future changes to DSP requirements such as the UK's wider Net Zero commitments and the potential introduction of hydrogen as an alternative clean fuel. The DSP service may be a key enabler to support these arrangements.

### **DCC conclusions**

75. DCC will continue to monitor the external change in relation to the DSP Programme and are pleased that stakeholders are largely supportive. We provide our views below on the additional areas of change suggested by respondents:
- a. We agree that REC change impacts to the DSP service should be considered and will monitor these as the REC change process further develops and new changes are proposed.
  - b. Regarding contention with the CH&N Programme, DCC has mapped the high-level dependencies across both the DSP and CH&N programmes from a delivery and technical perspective. The current CH&N Plan indicates SIT/customer UIT testing being carried out from Q2-Q4 2023, the DSP Data Systems plan currently assumes that we will be starting SIT/Customer UIT at in H2 2024, hence there exists a degree of separation today. However, if the CH&N plan is delayed or the Data Systems plan is accelerated, we will assess points where we can drive efficiencies in user testing. We will continue to track and manage dependencies across the programmes and will identify where there are opportunities to reduce testing (& other impact) on customers and drive synergies. Volume forecasts of service requests and CH installations have also been considered within our RFI, which drives the need for a DSP that's able to accommodate the demand and be able to further scale if/when required in a cost-effective way. There are further deep dives planned across the two programmes to ensure that there is complete alignment on dependencies, certainly as we progress into detail level requirements capture, this will also consider the technical interfaces between the two deliveries and impacts of each programme on one another.
  - c. The additional capacity requirements for Market Wide Half Hourly Settlements (MHHS) will be managed and implemented within the existing DSP system under live modification MP162, which is scheduled to be implemented in advance of any DSP transitional period. This will therefore be included as a requirement for any future DSP service arrangement.
  - d. As a key industry monopoly service provider to the energy industry, DCC must meet its regulated requirements however, we must also be cautious about developing services for related industry requirements that are not yet required in regulation. Therefore, we believe DCC can adapt to potential changes in service requirements within DSP by including scalability and flexibility as a key requirement for this future DSP service.
  - e. Additionally, one respondent questioned why DCC expects related SEC changes to be made under BEIS section 88 powers. It is the DCC view that undertaking SEC change in this way will enable the programme to be managed in a more efficient way and will not tie contractual

negotiations to the SEC change process. DCC is committed to fully consulting with stakeholders on all change that may be required by the DSP Programme.

### 3.7. Dependencies and Assumptions /questions 7 & 8

76. DCC presented the key assumptions that underpin the plan, as well as the dependencies on which the plan's delivery relies, asking two questions on these seeking respondents' views on whether they were complete.

#### 3.7.1. Question 7

##### Question 7

**Do you agree with our assessment of dependencies for DSP delivery? Are there any which are not been included but should have been?**

##### Response summary

77. Respondents broadly agreed with DCC's assessment of the dependencies for DSP delivery, noting that it is likely that new dependencies will emerge as the programme evolves. DCC should keep dependencies under regular review and allow new dependencies to be identified and assessed by the programme.
78. One respondent suggested that DCC should consider whether there is there is a need to apply prioritisation to the multiple and concurrent industry programmes. A key DCC internal dependencies is that the CH&N and other projects should be monitored to ensure that the project do not conflict.

##### DCC conclusions

79. DCC has a monthly meeting with all internal DSP stakeholders and a separate internal meeting with wider NEP stakeholders to manage and update programme dependencies. DCC manages prioritisation of all Network Evolution programme dependencies within our regular steerco. Any items that are impacting in near future and prioritisation given as appropriate. A dependency for this activity exists within as part of the programme management.
80. As part of the planned engagement with stakeholders, covered within section 3.9, DCC will review, update, and add new dependencies that are required.
81. One respondent noted that DCC should allow enough time for documents to be reviewed and responded to in relation to dependency D2, SEC Panel to provide advice to DCC on meeting SEC party business needs. Significant additional time has been added into the plan and plan contingency to facilitate this review.

#### 3.7.2. Question 8

##### Question 8

**Do you agree with our assumptions for DSP delivery? Are there any which are not included but should have been?**

## Response summary

82. Respondents broadly agreed with DCC's assessment of the assumptions for DSP delivery, noting that it is likely that new assumptions will emerge as the programme evolves. DCC should keep assumptions under regular review and allow new assumptions to be identified and assessed by the programme. One respondent suggested that further depth and detail needs to be applied to the consulted-on assumptions.
83. Additional assumptions were suggested in response to our consultation:
- a. That there will be no disruption to Energy Suppliers / DCC Users and end consumers given the enabling role DSP has in supporting consumer impacting services, particularly to those that have pay as you go smart meter functionality and may be classed as vulnerable.
  - b. That there may need to be parallel running on DSP interfaces for DCC users during transition, including gateway connections, Gamma Links, and security arrangements, depending on the solution that is implemented.

## DCC conclusions

84. DCC has a monthly meeting with all internal DSP stakeholders and a separate internal meeting with wider NEP stakeholders to manage and update programme assumptions. DCC manages prioritisation of all Network Evolution programme assumptions within our regular steerco. Any items that are impacting in near future are given prioritisation as appropriate.
85. As part of the planned engagement with stakeholders, covered within section 3.9, DCC will review, update, and add new assumptions that are required.
86. Of the new assumptions suggested:
- a. At this moment in time, we cannot guarantee that there will be no disruption to customers, we assume any disruption will be minimal at this moment in time, however we will engage with customers on the specifics and details of impact and how we collaboratively manage this once we get to a preferred solution.
  - b. This is our assumption too, subject to the preferred solution being agreed.

## 3.8. Risks and Opportunities /questions 9 & 10

87. DCC set out the key programme risks it had identified as having the ability to impact on programme delivery. We also set out some of the opportunities DCC could seek to employ as a way to deliver the plan more quickly, seeking respondents' views on these.

### 3.8.1. Question 9

#### Question 9

**Do you agree with our assessment of risks for DSP delivery? Are there any which are not included but should have been?**

## Response summary

88. Respondents broadly agreed with DCC's assessment of the risks for DSP delivery, noting that it is likely that new risks will emerge as the programme evolves. DCC should keep risks under regular

review and allow new risks to be identified and assessed by the programme. A number of respondents noted that the risks presented were at summary level.

89. Additional risks were suggested in response to our consultation:

- a. That without an obligation on DCC users to participate in testing, there is a risk that testing would not be thorough and issues may not be identified.
- b. That transition arrangements are not detailed enough and there may be risk to Energy Suppliers / DCC Users and end consumers given the enabling role DSP has in supporting consumer impacting services, particularly to those that have pay as you go smart meter functionality and may be classed as vulnerable.
- c. That there could be defects or incidents that may be identified during testing or early life following transition arrangements that may need to be managed.
- d. That in splitting DSP into separate programmes and roles a risk is created in managing and integrating these multiple new DCC service providers. This is increased with any further disaggregation and may introduce delays to the programme at various points due to increasing complexity.
- e. That other significant initiatives or programmes being delivered by the DCC in parallel could be delayed, impacting the DSP Programme.
- f. That due to the specialist nature of the DSP service, there may be fewer prospective service providers with the background, experience, and scale to deliver the new DSP solutions in the available timeframes leading to over commitment and under delivery.
- g. That there could be attrition of staff from the legacy DSP provider following contract award to a new provider, which could adversely impact legacy DSP services.
- h. That in transition to the new DSP there may be risks created by parallel running between the new and old DSP services. DCC may need to consider a common DSP interface thereby avoiding the need for DCC Users to have multiple interfaces with DCC.

### DCC conclusions

90. DCC has a monthly meeting with all internal DSP stakeholders and a separate internal meeting with wider NEP stakeholders to manage and update the Programme RAID. As part of the planned engagement with stakeholders, covered within section 3.9, DCC will review, update, and add new dependencies that are required.

91. New risks:

- a. DCC has captured the risks suggested above. Some are already part of the programme risk log and some of the others will be logged and managed where relevant.

### 3.8.2. Question 10

#### Question 10

Do you agree with our assessment of opportunities for DSP delivery? Are there any which are not included but should have been?

### Response summary

92. Respondents broadly agreed with DCC's assessment of the opportunities for DSP delivery, noting that it is likely that new opportunities will emerge as the programme evolves. DCC should keep opportunities under regular review and allow new opportunities to be identified and assessed by the programme.
93. One respondent commented that the opportunities presented by the Test Automation Framework (TAF), may become a risk if the TAF is not delivered on time. One respondent commented on the costs and benefits of the TAF programme itself.

#### **DCC conclusions**

94. DCC has a monthly meeting with all internal DSP stakeholders and a separate internal meeting with wider NEP stakeholders to manage and update any potential opportunities. As part of the planned engagement with stakeholders, covered within section 3.9, DCC will review, update, and add new opportunities where relevant.
95. DCC considers that the TAF presents an opportunity to the DSP Programme, however if this opportunity is not available to provide the necessary testing services, DCC will ensure that alternative arrangements, ahead of this risk materialising, are in place to ensure all tests are carried out on time and to the quality required. The DSP SI will also be in place before we commence testing and therefore will support in mitigating any testing risks/issues.

### **3.9. Customer Engagement /question 11**

96. This section of our consultation laid out DCC views on in the importance of engagement and listening to feedback from our customers and stakeholders. We also explained the requirements for engagement that will support BEIS approval of the Business Case for the DSP Programme.
97. We also provided an overview on DSP Programme (Data Services) engagements so far and our intended approach to planned engagement, highlighting consultations on SEC change and transitional arrangements, and where future updates on the programme will be provided.

#### **3.9.1. Question 11**

##### **Question 11**

**Do you support DCC's proposals for engagement with stakeholders during the delivery of the plan? If not, please tell us why.**

#### **Response summary**

98. Stakeholders were supportive of the proposed engagement and highlighted the benefit of involving Panel and SEC sub committees such as the TABASC, TAG and SEC Ops Group. One responded stated that it is not clear how potential changes to services will be communicated and consulted and whether the Quarterly Finance Forum (QFF) is the correct place for programme updates to be presented. A number of respondents suggested that that proposal was lacking some targeted engagement with the full range of DCC Customers.
99. A number of respondents noted that there may be benefit in establishing a dedicated technical specialist group for the DSP Programme, noting that this had worked well for other programmes and activities such as SMETS1 Enrolment and Adoption and Technical Specification Issue Resolution Subgroup (TSIRS).

## DCC conclusions

100. Based on the LC13B responses and wider customer feedback, DCC have developed our DSP engagement plan for the period leading up to approval of the DSP Data Services. The engagement through SEC Panel and Sub Committees such as SSC, TABASC, TAG & OSPG, will focus on the detailed discussions about how the High-Level Designs (HLDs), the Operating Model, Testing Strategy & Security Risks and Architecture meet the Business Needs.
101. In addition to discussion with SEC Sub Committees in H1 22, DCC will also engage with wider industry to on the migration and transition approach to ensure that all customers views are considered ahead of submitting any iterations of the OBC. Any changes to SEC based on these discussions will be included in an industry wide regulatory consultation.
102. DCC agree that Transition is a key focus for engagement, and we are investigating how we can facilitate working groups to cover detailed discussions on this topic. Transition workshops will be open to all DCC customers and industry stakeholders as well as through sub committees (TABASC, SSC, OPSG & TAG).
103. DCC will assess the option of setting up a dedicated stakeholder technical group to address issues that will inevitably be highlighted as the programme detail emerges. Customers will be engaged in advance to provide representation. These groups will be considered further within the next phase of engagement, post submission of the final OBC.
104. Whilst we will continue to use the QFF as a channel to provide programme updates, we understand that more frequent updates would be beneficial. DCC are working with Energy UK to utilise this channel further. To ensure that we can be as transparent as possible, we are also developing the website to allow customers to access documents, this will include some of the artefacts discussed with committees where this is possible. DCC also recognise the importance of customers unique needs therefore we will continue to have bilateral discussions with customers.
105. Next steps. DCC started to share its DSP Data Systems engagement plan with the SEC Sub Committees during 2021 and will further update these groups during 2022 as this plan evolves. This will also be provided to stakeholders at the QFF and can also be provided on request to stakeholders, following endorsement and baselining.



## 4. Additional points raised by stakeholders

106. DCC received a number of comments from stakeholders on broader points in relation to the DSP Programmes.
107. The purpose of DCC's consultation was driven by the Direction it received from BEIS to develop the delivery plan for the programme, and whilst we acknowledge the fundamental dependency on a robust business case for change, the consultation therefore focussed on how the programme should be delivered, as opposed to whether or not it should be delivered. It is for this reason that the questions asked focussed on implementation.

Point Raised	DCC Response
One respondent asked how DCC is planning to address any potential knowledge deficit in moving from the incumbent System Integrator (SI) to a future SI that may not be the same organisation.	<p>The DCC SI Programme are taking steps to mitigate this risk:</p> <ul style="list-style-type: none"> <li>DCC are exercising the rights within the exit clauses of the existing contract requiring the incumbent System Integrator to document all relevant activities.</li> <li>We have appointed a dedicated resource to act as an interface with the incumbent provider to ensure that documentation meets DCC needs.</li> <li>DCC are separately documenting the 'as-is' SI capability to ensure that all services of the incumbent SI, needed to perform to deliver DCC, are clearly documented.</li> </ul>
One respondent requested an overview from DCC on the organisational structure for the DSP Programme, including key individuals that stakeholders may need to engage with.	<p>DCC generally do not provide named individuals and prefer to provide a link to key business individuals through our Customer engagement team, this enables us to better manage consistency and avoids issues related to role changes. Further detail on planned customer engagement is included within section 3.9 of this document.</p> <p>Stakeholders should contact <a href="mailto:customerengagement@smartdcc.co.uk">customerengagement@smartdcc.co.uk</a> on any matters related to the DSP Programmes.</p>
One respondent suggested that some DCC systems have been allowed to reach end of life and that this may lead to short notice system replacements or upgrades that carry greater risks and costs for DCC Users.	<p>DCC have a revised process in place to monitor End of Life (EOL) for software and/or Hardware. DCC actively works with our suppliers relating to future EOL components and is agreed via a technology roadmap, which sets out when components will be coming to EOL. This is a DCC responsibility, however Technical Refresh of the DSP does not fall within scope of this programme.</p>
One respondent suggested that there was a gap in DSMS service provision from at least end of April 2022 through to September 2022.	<p>Current plans for the upgrade of the existing system and procurement of a new system do not result in any gaps in service provision. The existing version of the system remains in support until the upgrade to a new version is complete.</p>



<p>One respondent asked for additional information and the rationale supports DCC's DSMS Programme delivery plan and overall plan duration.</p>	<p>The DSP contract, which includes the DSMS service, has already been extended until October 2024 with an option to extend to October 2025 and negotiations to do that are now complete.</p> <p>DCC believes that this allows sufficient time to procure a new DSMS. DCC will monitor and report progress against this plan to industry via the industry managers forum including updates on the risks to not meeting the agreed timelines. There are an additional 2 years of termination support available which DCC may consider using if timescales move further to the right.</p> <p>The DSMS Programme will engage further with stakeholders in early 2022.</p>
<p>One respondent highlighted the benefits of utilising the Open Connectivity Foundation (OCF) Secure IP Device Framework.</p>	<p>DCC technical solutions will be informed by the upcoming DSP Data Systems RFI and will need to be compliant with regulated security requirements.</p>
<p>One respondent asked DCC to clarify how governance arrangement for the DSMS 'Upgrade' will be enforced.</p>	<p>The DSMS 'Upgrade' Programme does not fall within the remit of DCC LC 13B or LC 16 regulations, due to the activity being undertaken entirely within the CGI contract period and the costs being lower than the defined threshold. A paper has already been presented to the SEC Panel on this DSMS upgrade on likely costs and DCC will engage further should these costs or impact to DCC users change materially.</p>

## 5. Changes to the plan

108. Following stakeholder feedback, we have revised our planning assumptions and made changes to the plan originally consulted on, in September 2021. We detail these changes within the below sections, with a revised Plan on a Page (POAP) in Appendix A and a revised Milestone Plan in Appendix B.

### **Slippage of the Request for Information (RFI) - Data Systems**

109. The Request for Information (RFI) for DSP Data Services was initially proposed to start on the 29 September 2021. The review period of the RFI was longer than anticipated, and therefore was not released as originally scheduled. However, the RFI was successfully issued to suppliers on 20<sup>th</sup> December 2021. Because this is on the critical path, the delay in issuing the RFI has had a knock-on effect on some of the milestones that proceed this activity. The programme is assessing ways to ensure this has minimal impact on our upcoming milestones.

### **Planning Assumptions - Data Systems**

110. In line with stakeholder feedback and once we've got to a preferred option during 2022, DCC will assess whether/when, subject to BEIS regulatory approval, it will be exercising the extension option for the existing CGI DSP contract. This will extend the contract for a further year until October 2025.
111. An additional milestone has been added to formally identify the point where DCC has completed engagement with industry on its high-level approach to migration and transition, ahead of SEC Panel OBC engagement. The output of this engagement will feed into the conclusions of our regulatory change scoping document.

### **Introduction of additional Contingency - Data Systems**

112. Until DCC have defined the proposed solution to procure and implement a new DSP, there are still a wide range of options of varying degrees of complexity which will drive similarly wide-ranging plans. This uncertainty is being addressed by including checkpoints in the plans at strategic points to determine if the DCC should request direction from BEIS to update the plans. Until more is known about the solution, it is difficult to determine the amount of risk and contingency to incorporate into the plan. However, DCC has extended the overall timelines for the procurement, build & test, and transition activities in recognition of the comments received.
113. DCC has responded to stakeholder feedback (limited time and the application of contingency), DCC have reassessed the plan and proposed new timings. DCC has also put forward an approach to meeting this plan by separating the delivery of DSP into three workstreams, extending the procurement, build & test, and transition periods over longer, overlapping periods of time, as demonstrated within our Appendix A plan.

### **Adjustment of System Integration Milestones**

114. DCC will now procure the SI services as a single programme, not separately as Enduring and Programme SI as we detailed within our earlier consultation document. Our rationale for changing approach is that whilst our strategy for SI is still developing, it is a lower risk option to combine both SI workstreams at a programme level, however retaining the option to diverge at a later point, should that be the optimal way forward.
115. The earlier SI milestones have been adjusted to better reflect existing DCC planning, these include:

- Industry Engagement Complete, from 31 March 2022 to 22 April 2022.
  - Control Point, from 15 April to 2 May 2022.
- 116.** Because of the replanning that has taken place to the DSP Data System Programme, adjustments have been made to the corresponding supporting milestones of the System Integrator Programme. On the original timelines the services would be delivered in advance of when it would be required. Therefore, the SI procurement has been aligned to deliver more efficiently, better supporting the larger DSP Data Services Programme.
- 117.** These are:
- Invitation To Tender (ITT) Pack Issued + 3 months to 29 July 2022.
  - Award Contract + 6 Months to 01 March 2023.
  - Systems Integrator for Data System Programme in place + 3 Months to 30 Aug 2023.
- 118.** Noting that the SI will be in place in time to embed within the programme and input into the transition planning approach. This is in advance of PIT start.

### **DSMS Milestones**

- 119.** The earlier DSMS milestones have been adjusted to better reflect existing DCC planning, these include:
- Industry Engagement Complete, from 31 March 2022 to 22 April 2022.
  - Control Point, from 15 April to 2 May 2022.

### **Regulatory Change**

- 120.** Within the plan consulted on by DCC in September 2021, both the early 'Proposed scope of regulatory change' milestone and the later 'Confirmation of regulatory change' milestones aligned with the plan OBC and FBC submission respectively. This enabled BEIS to consider any stakeholder views on DSP regulatory change. The earlier 'Proposed scope of regulatory change' milestone has now been moved to after the OBC submission to better align with related industry engagement on DCC's migration & transition plans. However, planning indicates that the related consultation for this earlier milestone will conclude in advance of the OBC submission and whilst the conclusions document will not be complete at that point, BEIS will have access to and be informed by all stakeholder responses.

### **Format/Administrative Changes**

- 121.** These are non-critical changes made to the milestone document:
- A spurious absent number '32' milestone within the original table has been corrected.
  - Milestones 1-3 have been amended to include reference to the DSP SOC.
  - Some of the milestones now reflect the approach that there may be a 'window' to deliver multiple procurements, DBT's and transition

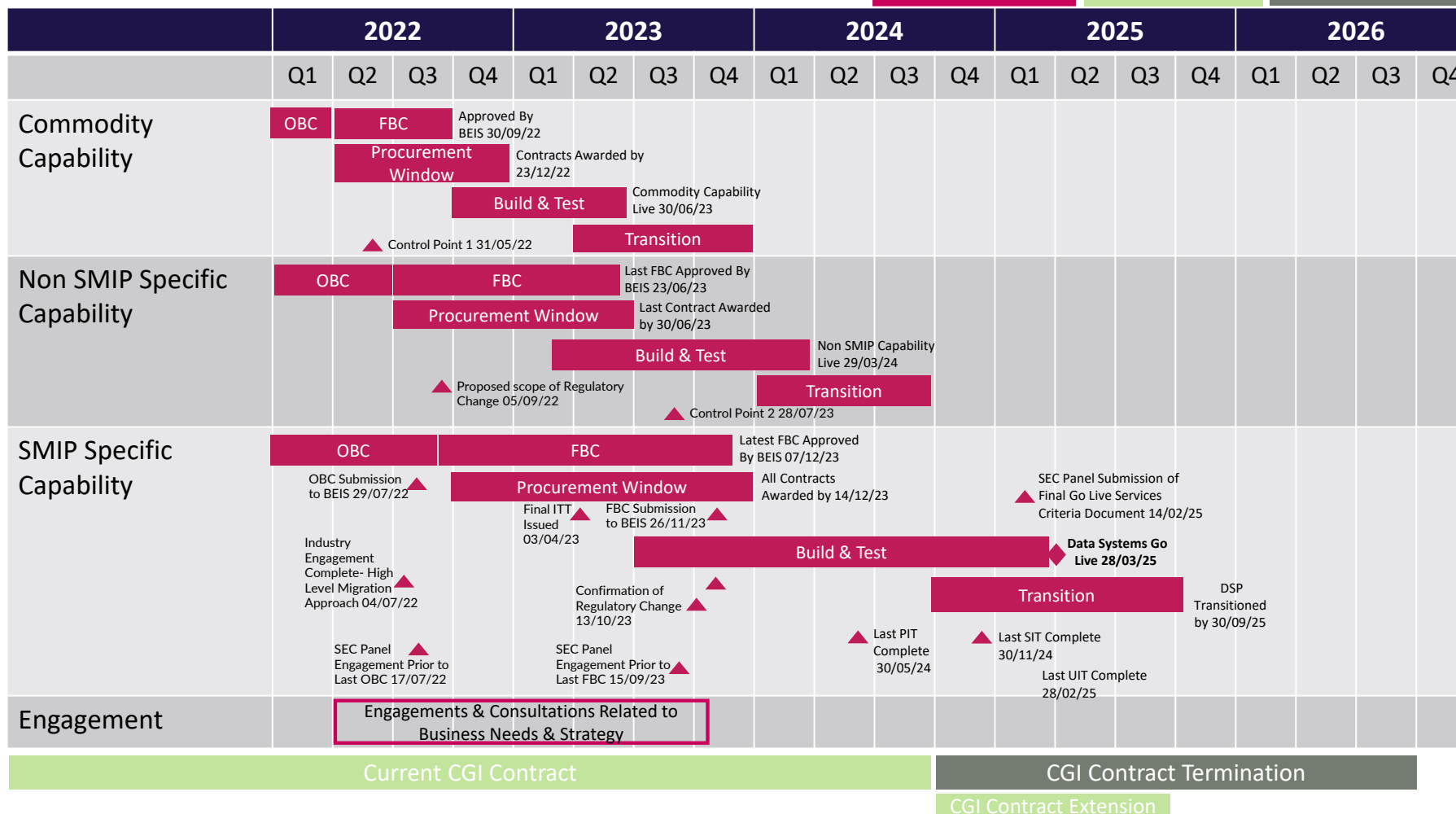
## **6. Next Steps**

- 122.** The Secretary of State will shortly make a determination on whether or not to approve the plan. Where approved, the plan will be incorporated into the Joint Industry Plan and its progress monitored through SMIP Transitional Governance.

# Appendix A – Plan on a Page

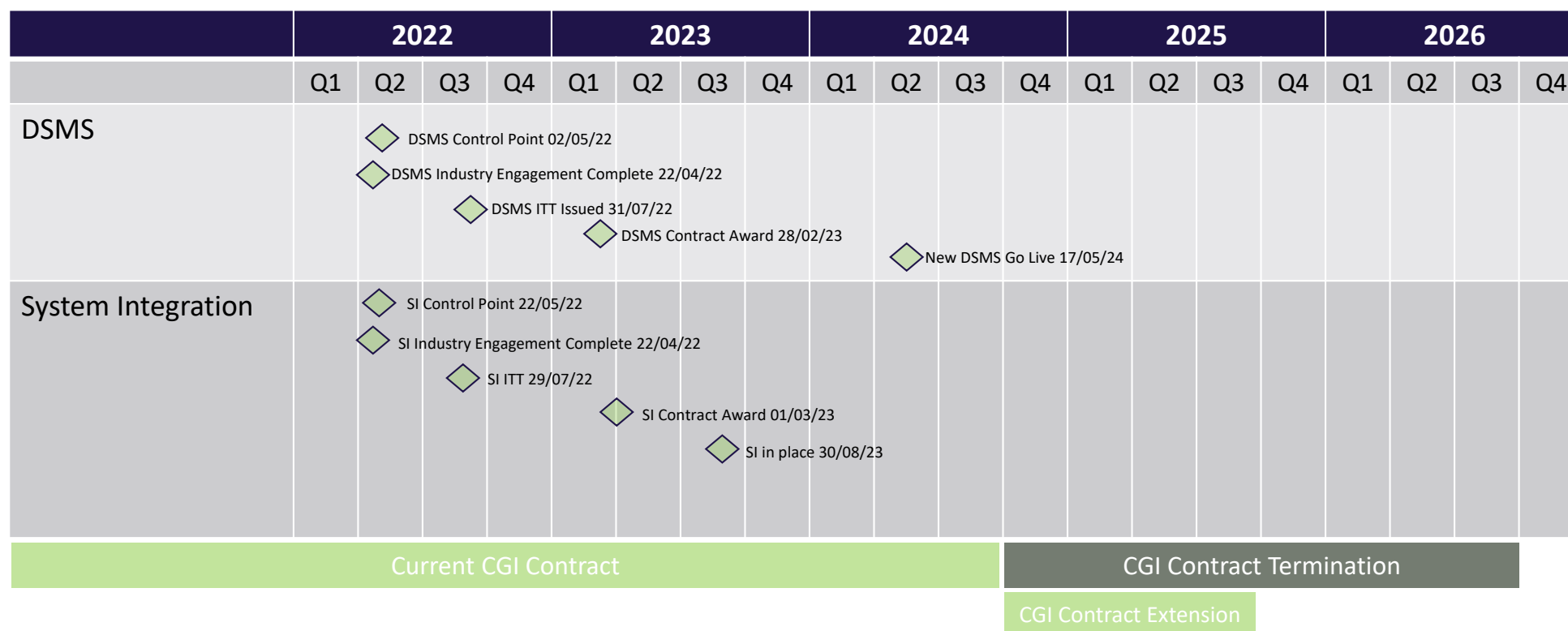
## DSP Data Systems

Key: Key Programme Deliverables & Milestones Current CGI Contract Inc the CGI Contract Extension Current DSP Contract Termination



DCC Controlled : DSMS (ITSM) Re-platforming Project

## DSP DSMS & System Integration



## Appendix B – Licence Condition 13B Milestone Table

Programme Key	
<b>Data Systems Programme</b>	The main programme that will deliver the replacement DSP data systems service. All dates provided are latest possible dates. There could be equivalent earlier milestones too dependent on procurement strategy.
<b>DSMS Programme</b>	The programme that will deliver the replacement DCC Service Management System (DSMS)
<b>SI Programme</b>	The programme that will appoint a Systems Integrator (SI).

#	Key Milestones	Description	Date
1	<b>DSMS – Industry Engagement Complete</b>	DCC has completed the necessary engagement with stakeholders in relation to the new DSMS service, ahead of the Strategic Outline Case (SOC).	22 Apr 2022
2	<b>SI Programme – Industry Engagement Complete</b>	DCC has completed the necessary engagement with stakeholders in relation to the SI service, ahead of SOC	22 Apr 2022
3	<b>DSMS – Control Point</b>	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to BEIS.	02 May 2022
4	<b>SI Programme – Control Point</b>	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to BEIS.	02 May 2022
5	<b>Data Systems - Control Point 1</b>	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to BEIS.	31 May 2022
6	<b>Data Systems - Industry Engagement Complete - High Level Migration &amp; Transition Approach</b>	DCC have completed engagement with industry on high level approach to migration and transition, ahead of SEC Panel OBC engagement.	04 Jul 2022

7	<b>Data Systems</b> - SEC Panel engagement completed prior to OBC	Latest possible date for SEC Panel engagement on SEC Party business needs following RFI for capturing and considering within the last (if more than one required) OBC	17 Jul 2022
8	<b>Data Systems</b> - Outline Business Case (OBC) Submission	All DCC Internal approvals complete. The last (if more than one required) Outline Business Case issued to BEIS for approval.	29 Jul 2022
9	<b>SI Programme</b> - Invitation To Tender (ITT) Pack Issued	Tender pack issued to bidders.	29 Jul 2022
10	<b>DSMS</b> - Invitation To Tender (ITT) Pack Issued	Tender pack issued to bidders.	31 Jul 2022
11	<b>Data Systems</b> - Proposed scope of regulatory change	DCC will issue a consultation conclusions document, that details the complete high-level regulatory change anticipated at this stage.	05 Sep 2022
12	<b>DSMS</b> - Award Contract	Contract signed and awarded, commence vendor onboarding and initiate design / build activities.	28 Feb 2023
13	<b>SI Programme</b> - Award Contract	Contract signed and awarded, commence vendor onboarding and initiate design / build activities.	01 Mar 2023
14	<b>Data Systems</b> - Final ITT Issued	Latest date an Invitation to Tender (ITT) will be issued for the Data Systems programme.	03 Apr 2023
15	<b>Data Systems</b> - Control Point 2 (FBC)	DCC to consider whether a further LC13B consultation is required to update future milestones. If applicable, a request will be made to BEIS.	28 Jul 2023
16	<b>SI Programme</b> - Systems Integrator in place	System Integrator service is ready for DSP Design, Build & Test.	30 Aug 2023
17	<b>Data Systems</b> - SEC Panel engagement completed prior to FBC	Latest possible date for SEC Panel views of updated Business needs to be captured and taken into account within the last (if more than one required) FBC.	15 Sep 2023
18	<b>Data Systems</b> Confirmation of regulatory change	DCC will confirm the final proposals for the regulatory drafting changes needed for the DSP Programme along with plans for its delivery.	13 Oct 2023
19	<b>Data Systems</b> - Full Business Case (FBC) Submission	Delivery of the last Full Business Case to BEIS for approval. (There may be multiple FBC submissions, linked to the number of procurements carried out.)	26 Nov 2023

20	<b>Data Systems - All Contracts Awarded</b>	All contracts will be signed and awarded in readiness to commence vendor onboarding and initiate design / build activities. This is the latest contract award date	14 Dec 2023
21	<b>Data Systems – PIT Start</b>	Latest possible date for PIT entry criteria met.	02 Jan 2024
22	<b>DSMS - New DSMS Go Live</b>	New DCC Service Management System Go Live following outcome of Procurement.	17 May 2024
23	<b>Data Systems - PIT Complete</b>	Latest possible date for PIT governance complete.	30 May 2024
24	<b>Data Systems – SIT Start</b>	Latest possible date for SIT entry gate complete.	01 Jun 2024
25	<b>Data Systems - SIT Complete</b>	Latest possible date for SIT governance complete.	30 Nov 2024
26	<b>Data Systems - User Testing Start</b>	Last point at which User Testing (UAT) starts.	01 Dec 2024
27	<b>Data Systems - SEC Panel – Submission of Final Go Live Services Criteria Document</b>	SEC Panel to consider the evidence submitted by DCC against Final Go live service criteria and make a recommendation to BEIS.	14 Feb 2025
28	<b>Data Systems - User Testing Complete</b>	Latest possible date for Window for user testing closed	28 Feb 2025
29	<b>Data Systems - Go Live</b>	All capabilities live.	28 Mar 2025
30	<b>Data Systems – Final Transition Start</b>	Latest possible start of transition from old system components to new system components starts.	07 Apr 2025
31	<b>Data Systems - Transition Complete</b>	Transition from old system to new system complete. Some services may be ready to transition earlier than this date, dependent on the procurement strategy.	30 Sep 2025



## Appendix C – Updated Lessons Learned

Lessons Learnt	Action the NE DSP Programme Has Taken
Build more time in the plan for engagement (SECAS, Industry & BEIS) ahead of ITT. Lesson learnt from CH&N that we need to engage more effectively on the options and the development of the preferred solution.	The programme has added in more time for engagement ahead of ITT, which includes industry workshops on migration
Ensure sufficient time for consultation with SECAS sub committees and industry is built into the plan, ensuring complete alignment across what artefacts will be shared, when and why	We are working with the SEC sub-committee chairs with regards to aligning on the engagement plan. We have collaboratively agreed all the artifacts we intend to present to each committee, when and for what purpose. This also includes a plan on when we intend to carry out industry consultations
Working closely with BEIS in advance of each stage of business case approval to ensure alignment, that expectations are met and there is no delay to signing of contracts related to this approval process.	We are working closely with BEIS to identify the key decision points and approval criteria to support the programme in transitioning through its delivery stages promptly
Incorporate more time into the plan for contract negotiation. CH&N have taken longer than expected to negotiate a contract.	We have added 12 weeks into plan as contingency to allow for this and will be proactively assessing ways to drive negotiations through more effectively
Ensure requirements are thoroughly traced back to contracts as well as the wider DCC eco system. ECOS had to conduct a retrospective exercise at the point of contract negotiation/award as there were gaps within the requirements	We are carrying out independent assurance of the requirements ahead of ITT to check for quality and completeness. We are also ensuring the programme evidence traceability back to contracts, designs, etc.
Holding customers workshops on Transition/Migration worked well on SMETS1	The programme has added in more time for engagement ahead of ITT, which includes industry workshops on migration

DCC to define the commercials within the OBC/FBC as early as possible, alongside the economic case and not separately. Not enough commercial thinking, contracts shared without background	We will be constructing a commercial case in parallel to the OBC/FBC and it will be shared as part of the iterative discussion with BEIS as and when the content is developed.
When considering options to be included within the business case, engagement needs to take place early enough in the OBC development process for responses to inform DCC's decision making process. The CH&N CBA was late in the process and gave customers the feeling they couldn't change any thing	We have planned in engagement earlier in the OBC cycle, leaving enough time to incorporate inputs from industry ahead of OBC sign off and ITT issue.
To ensure stakeholders have assessed, understand, and support our approach to the whole testing process, we will seek TAG's involvement in PIT and all subsequent testing stages.	Within our engagement plan we have built in sessions which will involve TAG & SMKI PMA in the development of our test approach documentation.
Testing Governance requires time and in previous programmes it has been necessary to ask TAG and others to operate to compressed timetables. We will include sufficient windows for testing governance in this plan.	Multiple TAG engagements have been built into the plan as well as the time required to carry out further testing governance and due diligence
Ensure that a consistent methodology (across DCC) on how requirements are documented for the procurement of services (in a quality and clear manner) is implemented.  CH&N brought in a consultancy who baselined what good looks like	We are taking the output from the consultancy as a baseline and have also agreed multiple assurance points within the programme plan in order to ensure that the requirements are fit for purpose, of good quality and complete
Provide shortlisted bidders with enough information, over and above the SEC, that allows them to understand the as is solution comprehensively. Other programme experience of just using the SEC documents as requirements, even when bolstered with the BRD, ends up delivering a solution that may meet most or all of the requirements, but does not actually work properly for our users, and is not easily operable or maintainable by the DCC.	We have prepared a summary of the SEC requirements for the RFI and key data points on volumetrics and performance. During ITT we will also be sharing specific artifacts with the shortlisted/preferred bidders which will include a comprehensive view of the as is design interface, as well as the high-level designs of the 'to be' solution. We will extract and re-use as much of the artefacts as legally and commercially possible from the incumbent supplier.