



Communications Hubs & Networks Conclusions on its consultation on Transitional and Enduring Regulatory Changes

DCC Conclusions for the Communications Hubs & Networks
program on proposed changes to the SEC to enable 4G
Communications Hubs

Date: 3 November 2023

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Classification: DCC Public

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1. Introduction and Context

1. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out of second-generation (SMETS2) smart meters, as well as the migration of existing first-generation (SMETS1) meters onto its network.
2. The Communications Hubs and Networks Programme (CH&N) is a DCC initiative geared towards defining and delivering future-proof Communications Hubs & Networks in the Central and South regions with an efficient supply chain and a targeted longevity of at least 15 years. To ensure this longevity of smart functionality DCC is developing a solution to allow for the introduction of new Communications Hubs (CHs) which use the 4G network. To achieve this, DCC established the CH&N Programme to assess development and implementation options for a 4G solution.
3. In its conclusions on the revised delivery plan for the CH&N Programme,¹ DCC proposed a number of milestones in its formal plan. One of which is 'Conclusions on enduring and transitional legal text regulatory changes for the programme' with a milestone date of 31 October 2023. This milestone is also included in the Joint Industry Plan (JIP).

1.1. Background

4. On 10 February 2023, DCC consulted on its initial assessment of regulatory changes that will be required for the 4G solution, outlining the anticipated changes required to several Smart Energy Code (SEC) Subsidiary Documents (SSDs), DCC owned documents and Main Body SEC changes (see Appendix A for the initial scope of regulatory changes). Following consideration and analysis of the responses to that consultation, DCC published a conclusion on 31 March 2023.²
5. Section F13 of the SEC places an obligation on DCC to produce a Network Evolution Transition and Migration Approach Document (NETMAD). DCC is required to develop and consult on a first version of the NETMAD. This document is required to include, amongst other things, any rules required to support the transition to and implementation of the DCC 4G service.
6. DCC has been engaging with Energy Suppliers since 15 February 2023 on a transitional strategy through a series of workshops, reviews and engagement with the SEC Panel and subcommittees. On 30 June 2023, DCC published its conclusions on this engagement, which provided the basis for the proposed content of the NETMAD.³
7. On 1 September 2023 DCC published a consultation on the DCC website⁴ (with an email notification sent to SEC Parties and other interested stakeholders) with responses due on 29 September 2023.
8. The consultation proposed enduring regulatory changes that are required to introduce 4G Comms Hubs into the Central and South parts of the DCC System as well as the transitional arrangements that are required to enable this.
9. The introduction of 4G Comms Hubs means that DCC will be introducing new service providers and functionality within the DCC Total Systems, which will require the requisite testing. Once 4G Comms Hubs are capable of being installed, 2/3G Comms Hubs and 4G Comms Hubs will be operating in parallel in Central and South. The SEC needs to be amended to reflect this situation.

¹ [Conclusions on the revised delivery plan for the CH&N Programme | Smart DCC](#)

² [Regulatory Changes for the Communications Hub and Network Arrangements | Smart DCC](#)

³ [Conclusions on 4G Transition Strategy following collaborative workshops | Smart DCC](#)

⁴ [Consultation on changes to the CH&N SVTAD | Smart DCC](#)

This is being done by introducing main body SEC changes which are being consulted on by the Department, with SEC Subsidiary Documents (SSDs), including a new document – the NETMAD – that are being consulted on through this document by DCC.

10. The proposed amendments to the SSDs include changes to Service Request Variants (SRVs) in DUIS to enable interrogation as to whether there is 4G connectivity in a specific geographical location in Central and South, as well as whether there is a 4G Comms Hub in a premises.
11. The proposed NETMAD transitional provisions primarily covered:
 - the period where a limited number of 4G Comms Hubs are installed on the DCC System to allow Parties and DCC to gain confidence in the DCC System (referred to as Initial Pallet Validation (IPV) within the CH&N delivery plan);
 - the ordering of Communications Hubs for the purposes of IPV; and
 - the introduction of a transitional 4G Coverage Checker which will allow Parties to check whether a location is capable of connecting to the 4G WAN prior to go live of the 4G systems at the end of 2024, following which coverage data will be available via the BAU processes of sending a DUIS SRV or a query via the Self-Service Interface (SSI).
12. In the consultation, DCC set out that it was including proposals related to an interim order management system for the purposes of Energy Suppliers ordering Communications Hubs for IPV, and would also be considering changes to the SEC in a second consultation which included changes related to the Order Management System (OMS) to support other (non-IPV) Energy Supplier Communications Hub forecasting and ordering that it would introduce for CH&N. However, since then DCC has decided to use the same Energy Supplier interface for both purposes and some small changes to the drafting have been made to accommodate this which are explained further in the DCC response to Question 11 of this document. DCC has engaged with Users on the potential solution.

2. Consultation Questions & Responses

2.1. Questions

The consultation presented the consultation questions as set out in Table 1.

CH&N Q1	Do you agree with DCC's proposal to amend the CHHSM and CHIMSM to distinguish between 2/3G WAN Variants and 4G WAN Variant, and that at this stage DCC should not amend the SEC to compel the installation of a certain type of WAN variant? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
CH&N Q2	Do you agree with DCC's proposal to amend DUIS to provide for the changes necessitated by the incorporation of 4G Comms Hubs and to do so as part of the June 2024 SEC release? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
CH&N Q3	Do you agree with DCC's proposal to amend the CHIMSM to reflect the new logistics arrangements? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

CH&N Q4	Do you agree with DCC's proposal that there should be no changes to the ETAD? Do you have any detailed comments on this proposal? Please provide a rationale for your views.
CH&N Q5	Do you have any comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
CH&N Q6	Do you agree with DCC's proposal for the inclusion of a temporary coverage checker? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q7	Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q8	Do you agree with DCC's proposal that DCC should produce an IPV Approach Document and that the IPVAD should be reviewed and approved by the SEC Panel or their nominated subcommittee, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q9	Do you agree the SEC Panel or their nominated subcommittee should decide whether the IPV entry criteria have been met, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q10	Do you agree with DCC's proposal that DCC should produce an IPV completion document and that the SEC Panel or their nominated subcommittee should decide whether IPV has been completed based on the exit criteria set out in the IPV Approach Document, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q11	Do you agree with DCC's proposals relating to the ordering of Comms Hubs for IPV? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.
CH&N Q12	Do you think there are any other changes that DCC should consider that could have an impact of the SEC?
CH&N Q13	Do you agree with the proposed 24 November 2024 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the designation of the NETMAD using the draft notification at Attachment 1?
CH&N Q14	Do you agree with the proposed re-designation of 27 June 2024 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to DUIS for 4G using the draft notification at Attachment 2?

Table 1

2.2. Responses

13. DCC received a written response from five respondents.
14. DCC provided all written responses to the Secretary of State.

3. Analysis of Responses

15. DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.
16. DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:
 17. an overview of the responses on the topic;
 18. where appropriate a DCC response; and
 19. areas where DCC disagrees with the view presented by respondents and this has not been resolved, as per the regulatory requirements.

3.1. Question 1

20. DCC sought views on proposed changes to SEC Appendix H 'Communications Hub Handover Support Materials (CHHSM)' and SEC Appendix I 'Communications Hub Installation and Maintenance Support Material (CHIMSM)' to reflect the availability of the new 4G Communications Hub WAN Variant in the Central and South Geographical Regions by asking: **"Do you agree with DCC's proposal to amend the CHHSM and CHIMSM to distinguish between 2/3G WAN Variants and 4G WAN Variant, and that at this stage DCC should not amend the SEC to compel the installation of a certain type of WAN variant? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views."**

Respondent View

21. DCC received five responses to this question.
22. All of the respondents agreed with DCC's proposals. All respondents commented that it should be the choice of the Energy Supplier as to what type of Comms Hub is installed at a site as any obligations in this regard would have significant impact on Energy Suppliers. In this regard it was also pointed out that DCC should provide relevant information to Energy Suppliers to assist them in making their decisions on which Comms Hub to install.
23. There were some clarifications that were sought by respondents.
24. A respondent noted that the HAN variant that was described as "(700MHz and 800MHz)" in Table 2 Annex E of SEC Appendix I should be with "(868MHz and 2.4GHz)" as these frequencies relate to WAN and not HAN.

DCC Response

25. DCC notes the concerns raised about any obligations being placed on Energy Suppliers regarding the installation on Comms Hubs. DCC will be providing the 4G in addition to the 2/3G coverage checkers which will assist Energy Suppliers in making their decisions on which Comms Hub to install.
26. DCC agrees that the description of the HAN variant is incorrect and has amended appendix I accordingly.

Areas of Unresolved Disagreement

27. None

3.2. Question 2

28. DCC sought views on proposed changes to Appendix AD – the DCC User Interface Specification which would allow Users to interrogate WAN availability for 4G as well as a change that would allow for the reading of the Inventory to all Users to determine the presence of a 4G Comms Hub in a Smart Metering System asking: **“Do you agree with DCC’s proposal to amend DUIS to provide for the changes necessitated by the incorporation of 4G Comms Hubs and to do so as part of the June 2024 SEC release? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”**

Respondent View

29. DCC received five responses to this question. There was agreement on the proposed changes, but there were also comments which sought clarification of the proposed changes.
30. A respondent sought clarification of the error code E20103 in that the description in section 3.8.127.3 of DUIS may be misleading as it might not indicate no coverage data as an http 500 error is generic in nature. The respondent was of the view that it would be better to have a more specific reference such as “CSP/WAN server error”.
31. A respondent was of the view that DCC should provide clear documentation on User experience when using older versions of DUIS including the experience both prior to and post 4G go-live. A respondent held a view that DCC should provide clear guidance on the use of the versions of DUIS.
32. A respondent requested that DCC provides an indication on any potential changes to SEC Schedule 11 (TS Applicability Tables) as a result of the introduction of DUIS 5.3.

DCC Response

33. The addition of the new Response Code E120103 only applies from DUIS v5.3 onwards with the description applying to DUIS v5.3 and subsequent versions.
34. For any User still operating with DUIS v5.2 or earlier, the new Response Code has not been updated. Previous DUIS versions will have the existing two Response Codes and Users using these versions will not receive an E120103 Response code as it is not supported by the XML Schema.
35. As a general principle for SEC subsidiary documents only the new version of DUIS is updated and previous versions remain unaltered so as to limit any change impacts on Users Systems who do not wish to update their interface.
36. DCC is of the view that a User is not required to upgrade to DUIS 5.3 in June 2024 but DCC anticipates that over time all Users will upgrade to DUIS5.3. DCC notes that there are other changes in DUIS 5.3 that might require a User to upgrade for DUIS 5.3.
37. The underlying reason for the http 500 in this area, for the SRV processing, is that there is no SM WAN coverage data available for the CSP Region, it is not trying to trap all general http 500 responses.
38. Currently in production environments, DCC does not see many (if any) of these http 500 errors, but it could happen and as DCC is introducing an additional CSP/WAN Providers it is seeking to resolve and align the design for the new version moving forwards. If a Supplier has upgraded to the new DUIS 5.3 Schema, the User might encounter this behaviour (as , however, any previous version will not receive these errors).

39. DCC will provide clear guidance as part of the standard activity for any SEC Release. DCC will continue to engage at Design Release Forums to provide information and guidance to Users. DCC will provide User experience narrative for both prior and post 4G service go-live with XML examples for impacted SRVs.
40. SECAS will be leading the process on changing the TS Applicability Tables.
41. DCC notes that the proposed DUIS XML schema for v5.3 includes an additional enumeration value for CSP Region of "4G North" to eliminate the need for further DUIS change in future versions, should a future decision be taken to provide a 4G service in the North Region. Post consultation, DCC has amended DUIS to include the appropriate 4G North enumeration value in line with the Schema. The practical impact however is that if a User submits a DUIS coverage query for a premises in the CSP North Region, only coverage data relating to the Arqiva Long Range Radio Network will be returned.
42. A decision to provide a 4G service in the North Region has not yet been taken and could only be taken if a DCC proposal to do so received non-objection from the Department.
43. DCC has not contracted for a 4G service in the CSP North Region.

Areas of Unresolved Disagreement

44. None

3.3. Question 3

45. DCC sought views on proposed changes to the CHIMSM to reflect changes related to new Logistic arrangements for 4G CH delivery by asking: ***"Do you agree with DCC's proposal to amend the CHIMSM to reflect the new logistics arrangements? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views."***

Respondent View

46. DCC received five responses to this question. Three responses agreed with the content and one respondent acknowledged the proposals but did not provide a specific view on the changes as they are not a DCC User and that it these should be considered by DCC Users.
47. A respondent noted that the process for the return of a 4G Cellular Comms Hub had not been addressed in the consultation. The respondent further noted the impact of the new vehicles that would be used to deliver 4G Comms Hubs and that it is important that the vehicles are appropriate to deliver to the respondent's warehouse. The respondent also sought information on the packaging information so that they could be certain that it would be appropriate and that wastage would be limited and to ensure that it could be differentiated from 2/3G packaging.

DCC Response

48. DCC intends to have the 4G Returns following the same process as 2/3G. . If the process changes under the SEC, DCC will consider and engage with stakeholders on whether this should also apply to 4G Comms Hubs.
49. DCC acknowledges that there may be specific requirements for the trucks that deliver Comms Hubs. As with 2/3G deliveries, the logistics provider will work with individual customers to ensure their delivery needs are met. DCC contacted the respondent and they confirmed that they were satisfied with the current drafting and that they would work with the logistics provider.
50. DCC has engaged with Users on the packaging for 4G Comms Hubs. There is no change to the packaging. The Comms Hub artwork will indicate that it is a 4G Comms Hub which can be used to

differentiate between 2/3G and 4G.. The packaging will be in line with 2/3G and DCC will continue to look at ways at reducing waste.

Areas of Unresolved Disagreement

51. None

3.4. Question 4

52. DCC initially identified that changes to SEC Appendix J – Enduring Testing Approach Document (ETAD) could be required, however following low-level design DCC are of the view that no such changes are required and sought views on this approach by asking: *“Do you agree with DCC’s proposal that there should be no changes to the ETAD? Do you have any detailed comments on this proposal? Please provide a rationale for your views.”*

Respondent View

53. DCC received five responses to this question.

54. Three respondents agreed with DCC’s position. Two respondents were of the view that DCC should obtain the input of TAG on this approach. One respondent was of the view that DCC should consult on any SEC related testing changes.

DCC Response

55. DCC will engage with TAG on its position that no changes are required to the ETAD. DCC agrees that it should consult on any changes to the regulations relating to testing. As DCC was not proposing any changes there was no such consultation. DCC notes that it is currently consulting on proposed changes to the SEC Variation Testing Approach Document (SVTAD) for CH&N.⁵

Areas of Unresolved Disagreement

56. None

3.5. Question 5

57. DCC sought views on proposed definitions for the NETMAD by asking: *“Do you have any comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*

Respondent View

58. DCC received five responses to this question.

59. All five respondents had no comment on the legal drafting with one stating it seemed logical and concise. One respondent noted that there was further content required for the NETMAD and requested that DCC continues its engagement with Users in the lead up to the next consultation in Q1 2024.

DCC Response

60. DCC acknowledges the comment and undertakes to continue to engage with Users on the proposed NETMAD content.

⁵ [Consultation on changes to the CH&N SVTAD | Smart DCC](#)

Areas of Unresolved Disagreement

61. None

3.6. Question 6

62. DCC sought views on proposed content for a temporary coverage checker in the NETMAD by asking: *“Do you agree with DCC’s proposal for the inclusion of a temporary coverage checker? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views..”*.

Respondent View

63. DCC received five responses to this question.
64. All respondents supported DCC providing an interim coverage checker. A respondent indicated that it would be beneficial to have the enduring 4G coverage checker available as soon as possible.
65. A respondent indicated that DCC currently provides a file that provides all postcodes and WAN strength for 2/3G and something similar would be helpful. A further respondent indicating that considered it would be preferable to have all the postcodes instead of searching them individually.

DCC Response

66. DCC notes the desire to have the interim coverage checker available as soon as possible. The enduring coverage checker requires testing and is inextricably linked to the governance process and go-live of December 2024, DCC will not be in a position to accelerate this process. It is for this reason that DCC expedited an interim coverage checker that Energy Suppliers can use to plan their 4G installations. This coverage checker will be regularly updated to ensure the information is as up to date as possible.
67. As set out in the draft NETMAD at clause 3.2, DCC will be providing a spreadsheet with all postcodes in a file that will be in the CSV format. This file can be interrogated by postcode and postal outcode, but will also be a total cut of the postcodes as requested in the responses. DCC will notify Supplier Parties if a new version becomes available.
68. The interim and enduring coverage checkers will not provide details of the strength of the WAN but reflects whether it will be present or not.
69. DCC notes that there was an error in the NETMAD drafting that referred to the interim coverage checker being available at the milestone of “LSC go-live”. The consultation document set out DCC’s position that it would be available as soon as the NETMAD is designated. DCC has accordingly amended the NETMAD, which will result in the obligation being on DCC to provide the interim coverage checker as soon as the NETMAD is designated and until the first LSC go-live, at which point the enduring coverage checker will be available.

Areas of Unresolved Disagreement

70. None

3.7. Question 7

71. DCC sought views on proposed NETMAD content for the IPV phase which is a phase during which Energy Suppliers will have the opportunity to install a limited number of 4G Comms Hubs in premises, which will allow Suppliers and DCC to trial the operation of 4G Comms Hubs in the live environment prior to volume manufacture by asking: *“Do you have any detailed comments on the legal drafting? Please provide a rationale for your views..”*.

Respondent View

72. DCC received five responses to this question.
73. Three respondents had no comments on the drafting, and one agreed with the drafting. One of these respondents were of the view that DCC should work collaboratively with Energy Suppliers on what information might be required and that DCC communicates with Energy Suppliers on 4G Comms Hubs being unable to be installed prior to go-live and the replacement of Mesh Comms Hubs.
74. A respondent was of the view that Clause 4.13(b) and Clause 4.14(b) should be amended to include: "...continue with the Initial Pallet Validation Stage and take All Reasonable Steps to efficiently and quickly remediate outstanding exceptions identified during IPV."
75. One respondent objected to the proposal to remove the ability of Users to replace Mesh Comms Hubs during IPV.

DCC Response

76. DCC will ensure that it works with Energy Suppliers through the various forums it attends to ensure that Parties are kept abreast of developments and to maintain the collaborative approach to the 4G transition.
77. DCC acknowledges the concern raised by the Respondent that DCC should quickly remediate any issues that arise during IPV. DCC has JIP milestones that it is required to meet and an incentive scheme that incentivises it to start the mass manufacture of 4G Comms Hubs as soon as possible. DCC will therefore be seeking to rectify any issues with 4G Comms Hubs quickly and is accordingly of the view that the proposed amendment to clauses 4.13(b) and 4.14(b) are not required.
78. DCC notes the concerns related to Mesh Comms Hubs. DCC will be engaging with Parties on the approach to the replacement of Mesh Comms Hubs in the lead up to the second regulatory consultation which is due to take place in Q1 2024. Given the comments received, DCC will include a reconsideration of the approach to replacement of Mesh Comms Hubs during IPV as part of this engagement. DCC has removed the restriction on replacing Mesh Comms Hubs during IPV from the version of NETMAD that it is submitting to the Secretary of State for designation.

Areas of Unresolved Disagreement

79. None

3.8. Question 8, 9 and 10

80. In its conclusions following the workshops, DCC set out that it would provide for an IPV governance framework in the NETMAD, DCC sought to views on whether the SEC Panel should review and approve an IPVAD by asking: ***"Do you agree with DCC's proposal that DCC should produce an IPV Approach Document and that the IPVAD should be reviewed and approved by the SEC Panel or their nominated subcommittee, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views."***
81. DCC also sought views on whether the SEC Panel should decide whether the IPV entry criteria had been met by asking: ***"Do you agree the SEC Panel or their nominated subcommittee should decide whether the IPV entry criteria have been met, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views."***
82. DCC proposed that it should produce an IPV completion document which would detail how it had met the exit criteria proposed in the IPVAD, which would be decided by the SEC Panel. DCC sought views on this proposal by asking: ***"Do you agree with DCC's proposal that DCC should produce an***

IPV completion document and that the SEC Panel or their nominated subcommittee should decide whether IPV has been completed based on the exit criteria set out in the IPV Approach Document, with disagreements over this determined by the Secretary of State? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views.”.

Respondent View

83. DCC received five responses to these questions.
84. There was general consensus that the SEC Panel should have oversight of the governance process. There was a view that DCC should work collaboratively with the SEC Panel and its sub-committees.
85. A respondent was of the view that the NETMAD should state “...SEC Panel or its nominated subcommittee...”.
86. One of the respondents to the consultation was the SEC Panel. DCC has had further discussions with the SEC Panel on the appropriate subcommittees for involvement in IPV governance. The SEC Panel has indicated that various subcommittees could be involved in the governance process in line with their terms of reference, however it will be the Panel that remains the entity that is responsible for making decisions.

DCC Response

87. DCC acknowledges the responses received relating to the subcommittees that should be involved. As the SEC Panel will be the party responsible for the governance of IPV as set out in the NETMAD and consultation document, DCC has amended the NETMAD on the advice of the SEC Panel and has changed reference in the NETMAD related to SEC Panel governance to “...SEC Panel...”. The SEC Panel will be able to involve whichever sub-committees it considers appropriate in arriving at its decisions. DCC will continue to work with the SEC Panel to ensure that the obligations in the SEC related to IPV governance are met.
88. DCC notes the comment related to whether subcommittee should be plural, however this has not been done as the reference has been removed on the basis of SEC Panel input.

Areas of Unresolved Disagreement

89. None

3.9. Question 11

90. DCC sought views on proposals for Ordering 4G Comms Hubs for IPV asking: *“Do you agree with DCC’s proposals relating to the ordering of Comms Hubs for IPV? Do you have any detailed comments on the legal drafting? Please provide a rationale for your views”.*

Respondent View

91. DCC received five responses to this question.
92. Four of the Respondents agreed with DCC’s proposal and that the process would allow for an equitable distribution of 4G Comms Hubs for IPV. One respondent indicated that they sought more than one pallet for IPV to ensure that they could undertake sufficient testing of 4G Comms Hubs during IPV.

DCC Response

93. DCC discussed the concerns relating to the number of 4G Comms Hubs that would be available for IPV with the respondent. The respondent acknowledged that the approach proposed by DCC was a pragmatic approach which would provide a means to ensure an equitable distribution of 4G CHs.

The respondent indicated that they did not object to the approach proposed by DCC in the NETMAD.

94. In the consultation, DCC set out that the order management system for ordering Communications Hubs for IPV would be different to the order management system for forecasting and ordering non-IPV communications hubs, Accordingly DCC explained that it would be considering further changes to the SEC in a second consultation to support the introduction of the order management system to be used in respect of non-IPV Communications Hubs. Since then, however, DCC has decided to use the same Energy Supplier interface for both purposes and has engaged with Users on this approach. Essentially this means that the same email template will be used for ordering IPV and non-IPV Communications Hubs. DCC has therefore made some small changes to the drafting to state that DCC will provide an email template for Comms Hub ordering for IPV.

Areas of Unresolved Disagreement

95. None

3.10. Question 12

96. DCC sought views on whether there were any more potential changes that were not identified in the consultation asking: *"Do you think there are any other changes that DCC should consider that could have an impact on the SEC?"*

Respondent View

97. DCC received five responses to this question.
98. There was consensus from respondents that DCC had captured the relevant content that is currently required. The following points were raised for consideration:
- a. The processes for bulk returns of 2G/3G comms hubs.
 - b. Flexibility in Communication Hub Forecasting and Ordering Rules for 2G/3G Communications Hubs
 - c. Delivery of the to-be Order Management System capability for 4G Communication Hubs,
 - d. DCC considers the key learnings / recommendations from the DESNZ-led TCSO (Trust Centre Swap-Out) / CH Exchange proving activities with industry and DCC (in 2022 and 2023) to ensure that DCC testing activities and IPV take into account the relevant testing scenarios and orchestration that need to be replicated or catered for, given the complexity of the TCSO process.

DCC Response

99. DCC notes these suggested areas. DCC is considering the content and will have further engagement on these topics.
100. Clause 5.16 of the NETMAD includes an acknowledgement that the current rules that apply in the SEC in respect of Communications Hubs post ordering will also apply to the 4G Communications Hubs that are ordered for IPV. This was included as the SEC has not yet been amended to apply in respect of 4G. However, it is possible that there could be some differences in those rules in respect of 4G, for example as DCC further develops its order management solution there could be differences. Should such changes be required, the DCC recognises that any changes that could impact on a decision to order 4G Communications Hubs should be made before orders are place for IPV Communications Hubs and DCC will therefore structure its regulatory consultation and conclusions activity to achieve this.

Areas of Unresolved Disagreement

101. None

3.11. Question 13

102. DCC sought views on the proposed designation of the NETMAD asking: *“Do you agree with the proposed 24 November 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the designation of the NETMAD using the draft notification at Attachment 1?”*

Respondent View

103. DCC received five responses to this question.

104. All respondents agreed with this proposal. Two respondents indicated that there was a typographical error in the question in that the date was 24 November 2024 instead of 24 November 2023.

DCC Response

105. DCC acknowledges the error in the initial version of the consultation. DCC identified this error and rectified it on 18 September.

106. DCC notes the respondents' support for the proposed designation date and DCC therefore concludes it is appropriate to designate the NETMAD on 24 November 2023. DCC accordingly proposes that the Secretary of State designates the NETMAD on 24 November 2023 (or within one month thereafter).

Areas of Unresolved Disagreement

107. None

3.12. Question 14

108. DCC sought views on the proposed designation of DUIS asking: *“Do you agree with the proposed re-designation of 27 June 2024 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to DUIS for 4G using the draft notification at Attachment 2?”*

Respondent View

109. DCC received five responses to this question.

110. All respondents agreed with the proposed designation date.

DCC Response

111. DCC notes the respondents' support for the proposed re-designation date and DCC therefore concludes it is appropriate to re-designate the DUIS on 27 June 2024. DCC accordingly proposes that, if the DUIS 5.3 testing is successful, the DCC will then submit a proposal to the Secretary of State to re-designate DUIS on 27 June 2024 (or within one month thereafter).

Areas of Unresolved Disagreement

112. None

4. Summary of Drafting Changes

113. As a result of consultation responses and to clarify the content of the drafting DCC has made a number of drafting changes to the documents consulted upon.
114. DCC has amended the NETMAD as follows:
- Amending the definition of completion report to provide clarity.
 - Amending the definition of Joint Industry Plan to provide clarity.
 - Amending Clause 3.1 to reflect policy that was articulated in the consultation document that DCC would provide an interim coverage checker prior to LSC1.
 - Removing the obligation relating to Mesh Communications Hubs at paragraph 4.2, with consequential changes to clause references.
 - Amending Clause 4 to reflect the views expressed by the SEC Panel on the governance decisions for the Initial Pallet Validation Approach Document.
 - Amending Clauses 5.3 and 5.4 to reflect that DCC will be using a template for IPV ordering which will be in line with BAU processes.
115. DCC has amended DUIS as follows:
- Amending Table 227 and Table 260a to align references to 4G North with the DUIS schema.
116. Appendix I – Communications Hub Installation and Maintenance Support Material (CHIMSM) has been amended as follows:
- The reference to Cellular Communications Hub in Paragraph 4.2 has been amended to WAN Variant as identified in the coverage checker to reflect that the 2/3G coverage checker will identify only one specific WAN Variant.
 - Table 3 has been updated to reflect consequential change to Service Request 12.1 in DUIS to reflect the addition of 4G Central and South,
117. Appendix H – Communications Hub Handover Support Materials (CHHSM) has been amended as follows:
- The definition of CH Query has been amended to remove a typographical error.
 - Clause 3.10 has been amended to make it clear that the choice of which Comms Hub to install is limited to 2/3G and 4G.
 - Clause 3.13 has been amended to provide clarity on the delivery locations a Party is required to provide.
 - Clause 3.14 has been amended to correct a typographical error.
 - Table 1 in Annex A has been amended to reflect the requirements for 4G Central/South.
 - Table 2 in Annex B has been amended to remove a typographical error and to include the obligations on pallets as reflected in the consultation.

5. Conclusions

118. DCC is of the opinion that it has had appropriate engagement and consultation with industry on the changes that have been proposed to the DUIS in this consultation. As the responses to the consultation and engagement in industry were supportive of the proposed changes, DCC will submit the proposed changes to the Department for Energy Security and Net Zero ('the Department') for designation into the SEC once the testing for DUIS 5.3 has successfully completed.
119. As set out in the consultations, the proposed changes are due to be designated on 27 June 2024 (or within one month thereafter).
120. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the DUIS and, as such, further consultation is neither necessary nor appropriate.
121. It is DCC's view that it has met its SEC obligations.
122. DCC considers that:
- The proposed DUIS is defined to a sufficient level of detail for re-designation into the SEC and is materially complete, and the content is technically accurate;
 - There has been appropriate consultation on the proposed changes; and
 - The proposed changes align with the technical requirements for the introduction of 4G Comms Hubs.
123. In summary, DCC considers that the revised DUIS is fit for purpose.
124. DCC is of the opinion that it has had appropriate engagement and consultation with industry on the proposed content for the new NETMAD document. As the responses to the consultation and engagement in industry were supportive of the proposed content, DCC will submit the proposed NETMAD document to the Department for Energy Security and Net Zero (The Department) for designation into the SEC on 24 November 2023 (or within one month thereafter).
125. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the NETMAD and, as such, further consultation is neither necessary nor appropriate.
126. It is DCC's view that it has met its SEC obligations.
127. DCC considers that:
- The proposed NETMAD is defined to a sufficient level of detail for designation into the SEC and is materially complete for the current requirement, and the content is technically accurate;
 - There has been appropriate consultation on the proposed changes; and
 - The proposed content aligns with the process and technical requirements for the general obligations, interim coverage checker, and the Initial Pallet Validation process and governance for the transition to 4G Comms Hubs.
128. In summary, DCC considers that the NETMAD is fit for purpose.

6. Next Steps

129. DCC will submit its conclusions to its Communications Hubs & Networks Consultation on Transitional and Enduring Regulatory Changes to the Secretary of State on 31 October 2023 and anticipates that the Secretary of State will designate the NETMAD on 24 November 2023 (or within one month thereafter). Once the testing of DUIS 5.3 has successfully completed DCC will submit the DUIS to the Secretary of State for re-designation of the DUIS on 27 June 2024 (or within one month thereafter) in line with the consultation.
130. DCC will be engaging with Users on further potential changes to the regulatory framework in line with the consultation and the comments received for question 12. Following this engagement, DCC anticipates consulting on further changes in Q1 2024.

7. Attachments

Attachment 1: SEC Appendix H – Communications Hub Handover Support Materials
(CHHSM)

Attachment 2: SEC Appendix I – Communications Hub Installation and Maintenance
Support Material (CHIMSM)

Attachment 3: SEC Appendix AD – DCC User Interface Specification (DUIS)

Attachment 4: Draft Network Evolution Transition and Migration Approach Document
(NETMAD)

