



Response

to the DCC consultation on
changes to the 'Pre-Go Live'
ECoS Transition and
Migration Approach
Document (ETMAD)

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1. Introduction

1.1. Executive summary

1. On 31 March 2023, DCC issued a consultation seeking stakeholder views on proposed changes to the existing version of the Enduring Change of Supplier (ECoS) Transition and Migration Approach Document (ETMAD) (version 2.0) or Smart Energy Code (SEC) Appendix AS, that was proposed to be re-designated ahead of ECoS Go Live¹. This consultation closed on 25 April 2023.
2. This document provides a DCC response to the industry comments received via the consultation and sets out the DCC's conclusions. We have discussed and agreed the contents of this consultation response document with the Department of Energy Security and Net Zero (the Department) and this document is the submission to the Department as per DCC's obligations under SEC Section G11.6.
3. The key conclusion is that while no issues have been identified to prevent re-designation of the 'Pre Go Live' ETMAD, there have been ongoing discussions regarding the timing for the provision of Production ECoS Certificates. DCC's conclusion is that the ECoS Certificates are not required ahead of ECoS Go Live and therefore the changes proposed in the consultation on the 'Pre Go Live' ETMAD are not required.
4. In addition, DCC has been considering the timeline for the issue of an updated Manufacturing Pack containing the ECoS Certificate, to allow the commencement of ECoS Device manufacture. The current expectation is that the Manufacturing Pack will not be issued in August 2023, as originally anticipated within the Joint Industry Plan (JIP) milestone. A delay in the issuing of the Manufacturing Pack means that Supplier Parties would not be able to meet the requirement in Clause 1.15 of the 'Go Live' ETMAD to prioritise the installation of TCoS Devices ahead of ECoS Devices. We are therefore taking this opportunity to highlight to Supplier Parties that the requirements in Clause 1.15 of the 'Go Live' ETMAD will not result in suppliers having to take any action until such time as the Manufacturing Pack is issued. If it becomes apparent that these clauses are not required at all, then additional changes to remove this clause from the ETMAD (and the clause 1.16 which places equivalent obligations on DCC), may be progressed following ECoS Go Live.
5. DCC acknowledges that industry has raised concerns about their ability to deploy all residual TCoS stock and manage the switchover of supply chain to the manufacturing of ECoS Devices by the time the TCoS service is switched off. To address this risk, DCC is committed to implementing a change whereby the TCoS Party private keys are transferred to the ECoS Party, preventing TCoS Devices losing smart capability following the switch off, of the TCoS service. This solution has been proven via a technical proof of concept and will be progressed and implemented prior to the planned TCoS switch off in 2024. Further updates on timing will be provided to the Technical and Business Design Group (TBDG) this summer.

¹ <https://www.smartdcc.co.uk/consultations/consultation-on-changes-to-the-pre-go-live-etmad/>

1.2. Background and context

6. The introduction of the ECoS arrangements requires changes to the SEC main body as well as to several SEC Subsidiary Documents. The required SEC main body changes and the initial version of the ETMAD came into effect on 25 October 2021. The effect of the initial version of the ETMAD was primarily to suspend these main body SEC changes prior to ECoS Go Live.
7. As part of the ECoS Go Live preparation activities, DCC identified the possible need for a pre ECoS Go Live change to the ETMAD to enable ECoS Certificates to be provided to the ECoS Party. This would allow the ECoS Party to request production ECoS Certificates and for these to be subsequently provided to the Communications Service Providers (CSPs) prior to ECoS Go Live. This would enable the manufacturing process to commence for Communications Hubs to be used for the initial install and commission pilot exercise post ECoS Go Live. This proposed change would have been applied to the existing version of the ETMAD and would not impact the drafting or re-designation of the 'Go Live' ETMAD.

2. Summary of Consultation Response

1.3. Consultation Questions

8. Within its consultation document, DCC asked industry to consider three questions, as set out below.

Q1	Do you agree with the proposed changes to the existing ETMAD (version 2.0)? Please indicate any areas of disagreement and the reasons for them.
Q2	Do you agree with the proposed re-designation date of 8 May 2023 for the Pre-Go Live ETMAD (or, if necessary, as soon as reasonably practicable within one month thereafter?)
Q3	Do you have any further comments to make regarding the Pre-Go Live ETMAD?

9. In total, two organisations (both of which are Supplier Parties) responded, providing direct responses to some, or all the questions. A summary of responses to the consultation questions and the DCC conclusions are provided below.

1.4. Question 1 – Consultation response summary

Question 1	Do you agree with the proposed changes to the existing ETMAD (version 2.0)? Please indicate any areas of disagreement and the reasons for them.
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10. Both respondents expressed support for the proposed changes to the existing ETMAD (version 2.0).

1.5. Question 2 – Consultation response summary

Question 2

Do you agree with the proposed re-designation date of 8 May 2023 for the Pre-Go Live ETMAD (or, if necessary, as soon as reasonably practicable within one month thereafter?)

11. Both respondents expressed support for the proposed re-designation date of 8 May 2023 for the 'Pre-Go Live' ETMAD.

1.6. Question 3 – Consultation response summary

Question 1

Do you have any further comments to make regarding the Pre-Go Live ETMAD?

12. One respondent took the opportunity to request further detail regarding outstanding issues:
- Whether the TCoS Service Provider will re-try the certificate rotation following successful Gas Proxy Function commissioning by the Supplier Party?
 - In response to this query, DCC can confirm Gas Proxy Function commissioning has no bearing on the decision to carry out certificate rotation. The certificate rotation for all devices including the Gas Proxy Function will be managed by DCC independently of commissioning.
 - Which nominated contact category should be used for ECoS reporting?
 - In response to this query, DCC can confirm that the existing 'Reporting' contact within the Nominated Contacts List will be used for ECoS Migration reporting. The existing process for updating the contacts will also apply.
 - By what date will the decision to transfer TCoS private keys to the ECoS Service Provider be taken?
 - DCC is committed to implementing a change whereby the TCoS Party private keys are transferred to the ECoS Party. DCC is currently working on this solution and further updates on timing will be provided to the Technical and Business Design Group (TBDG) this summer.

3. Next Steps

13. In parallel with the publication of this document, DCC has provided a summary of responses to the Department and also discussed the re-designation of the 'Pre Go Live' ETMAD in accordance with G11.6(c) of the SEC.
14. While no issues have been identified to prevent re-designation there have been ongoing discussions regarding the timing for the provision of Production ECoS Certificates. DCC's conclusion is that the ECoS Certificates are not required ahead of ECoS Go Live and therefore the changes proposed in the consultation on the 'Pre Go Live' ETMAD are not required.

15. As highlighted in paragraph 4. DCC is considering the timeline for the issue of the Manufacturing Pack, to allow the commencement of ECoS Device manufacture. Further information regarding this activity will be shared via appropriate industry forums and processes. In the meantime, DCC can confirm that the requirements in Clause 1.15 of the 'Go Live' ETMAD will not result in suppliers having to take any action until such time as the Manufacturing Pack is issued. If it becomes apparent that this clause is not required at all, then additional changes to remove this clause (and the clause 1.16 which places equivalent obligations on DCC) from the ETMAD, may be progressed following ECoS Go Live.
16. As outlined in this conclusions document, DCC is committed to implementing a change whereby the TCoS Party private keys are transferred to the ECoS Party. This is to address industry concerns raised about the ability to deploy all residual TCoS stock and manage the switchover of supply chain to the manufacturing of ECoS Devices by the time the TCoS service is switched off. DCC will keep industry informed on progress of this solution and the timing of implementation over the coming months.