



Data Services Provider (DSP)

DCC conclusions on the revised delivery plan

Date: 16th December 2025

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Classification: DCC Public

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1. Background and context

1. The purpose of this document is to conclude on the Data Communication Company's (DCC's) recent consultation on the revised plan for the delivery of the Data Services Provider (DSP) Programme.¹
2. Following the conclusion of the DSP procurement process, DCC agreed with the Department for Energy Security & Net Zero (DESNZ) (the Department) that DCC should produce a new plan for the DSP programme. Consequently, the Department issued a direction to DCC under Condition 13B of the Smart Meter Communication Licence (LC13B) on 26 June 2025 directing DCC to produce a new plan for the delivery of the DSP Programme. This plan needed to include delivery milestones for any DCC activities that may impact on or require input from Smart Energy Code (SEC) Parties or the industry. DCC is required to submit its revised plan to the Department following appropriate consultation with SEC Parties and the SEC Panel. This document forms DCC's submission of this revised plan.

1.1. The DSP Programme

3. The DSP sits at the heart of the smart metering infrastructure, providing data services that connect Energy Suppliers to devices at their consumers' premises. The DSP Data System is a central facility that controls the flow of messages to and from smart metering equipment, with Service User (SU) organisations (e.g. Energy Suppliers, Network Operators, and Other Users) communicating via these central DSP facilities.
4. The contract for the current DSP solution (referred to in this document as 'As-Is DSP') is set to expire in 2028 and encompasses several different capabilities including but not limited to:
 - a. Provision of gateway services (i.e. network connectivity) to connect SU and Service Providers (SPs) to the DSP in both production and test environments.
 - b. The maintenance of the DCC User Interface Specification (DUIS) which sets out the structure of the messages that can be exchanged with the DSP.
 - c. The Core DSP which provides message routing, anomaly detection, registration services, inventory management, DCC Key Infrastructure 2 (DCKI2 – which refers to the cryptographic certificates used within the Public Key Infrastructure framework of the DCC), Certification Authority (CA), security checking, logging and reporting, and a Smart Metering Key Infrastructure (SMKI) repository.
 - d. A DCC Service Management System (DSMS) which supports DCC's service operation.
 - e. A Systems Integrator (SI), which manages key elements such as change and testing to ensure the system functions optimally.
5. The DSMS capability is in the process of being disaggregated with a replacement service being delivered under DCC's Future Service Management (FSM) Programme. FSM is a separate programme to DSP, and the delivery plan for FSM has been consulted on separately. It is therefore not within the scope of this document and milestones relating to that programme are not included. The FSM solution is due to Go-Live on 21 March 2026 and there is not a dependency on FSM to be delivered before DCC Connect, as the existing Remedy platform can be used to support service management for DCC Connect until ServiceNow is available on FSM, should FSM be delayed.
6. DCC completed a Full Business Case (FBC) for a new DSP contract earlier in 2025 to reprocure a solution for the remaining capabilities within the existing contract. New contracts were signed

¹ [DSP consultation on the revised delivery plan | Smart DCC](#)

with partner organisations in April 2025. A disaggregated approach was adopted, with different partner organisations providing the following capabilities:

- Core DSP being delivered by IBM, which has completed the blueprint (high-level design) phase and is now in the incremental design, build and test phase. This will include a new DCCKI Certification Authority (referred to as DCCKI2 in this document).
- DCC gateway connections will be provided by VodafoneThree. This service is referred to as DCC Connect.
- Modular DUIS capability provided by Netcompany. This is a change from the existing 'monolithic' design of DUIS in the As-Is DSP and is intended to introduce more flexibility for SUs. A decision has been taken to implement modular DUIS on the new DSP solution (referred to in this document as 'Future DSP') only, rather than also implementing the solution on As-Is DSP, as was originally planned. A control point milestone (CP6) for 30 August 2027 was included in the plan associated with the new modular DUIS, at which point DCC will share the proposed timelines for implementing modular DUIS. DCC intends to consult on any changes required to implement modular DUIS on the Future DSP. The timelines for this regulatory consultation will also be confirmed at CP6.
- DSP SI being provided by CGI.

7. The DSP Programme will encompass the implementation of these new capabilities, except for the SI capability which is already in operation. This includes the provision of new gateway connections and the migration of devices from the As-Is DSP to the Future DSP.

1.2. Consultation responses and next steps

8. The consultation, which ran from 22 August 2025 to 3 October 2025, sought views on the revised plan for the delivery of the DSP Programme.
9. A summary of the comments received and DCC's responses to these is set out in Section 2 of this document. DCC has made a small number of changes to the plan that it consulted upon, based upon responses received to the consultation, ongoing customer engagement, and the design of the programme during the 'blueprint' phase, and its conclusions on this are set out in Section 3 of this document. The blueprint phase referred to is the high-level design phase of the programme, which was completed in November 2025. At the end of this phase, DCC was able to confirm the scope of the first stage of the incremental design, build and test phase of the programme, complete the assurance of the design which was driven by the DSP SI, and assess the contracted requirements and identify any gaps that needed to be resolved before proceeding with the incremental design, build and test phase. DCC therefore does not consider that it needs to make use of Control Point (CP) 4, which had been added to the plan for November 2025 to mark the end of the blueprint phase, as this Milestone has been met and DCC has concluded that no further changes to the delivery plan are required beyond the changes set out in this document.
10. The two further CPs remain in the plan, aligned to the key inflection points of delivery. This includes CP5 in December 2026, which will mark build completion for Programme Increment (PI) 4, where the functional development of the Future DSP will have been completed and further validity of future dates will be available. The final CP in the plan, CP6, is in August 2027 to confirm the implementation timelines for Modular DUIS.
11. The Milestones and descriptions relating to the Smart Routing Gateway (SRG) have been updated to now be termed 'DSP Release 1' in this document and the revised plan. This is because further design work has identified that, as well as releasing the SRG at this point in the programme, this release will also include new DCCKI certificates (DCCKI2), meaning that DCC considers 'DSP Release 1' to be a more appropriate title for this activity. Accordingly, Milestones associated with the Future DSP Go-Live have been updated to 'DSP Release 2'.

12. The Milestones for DSP Release 1 that were presented in the consultation plan were indicative as they were subject to further scoping and an ongoing Change Request (CR) process. This process has now concluded and therefore the Milestones associated with DSP Release 1 in this document are presented as confirmed.

2. Analysis of responses

13. DCC received four responses to this consultation: two from Large Suppliers, one from a Network Party and one from the SEC Panel.
14. DCC has analysed the responses and provided feedback, and this is detailed in this Section.

2.1. Question 1

15. DCC sought views on the proposed milestones for DCC Connect and associated dependencies.

Q1

Do you agree with the proposed Milestones for the DCC connect cutover and associated dependencies on SUs and Test Participants (TPs)?

Respondent views

16. Three respondents agreed with the proposed milestones for DCC Connect, with one requesting further clarity on specific dates and dependencies around Energy Supplier readiness and technical cutover. They added that clear communication and sufficient notice are essential to ensure a smooth transition to DCC Connect.
17. A fourth respondent highlighted that the plan must minimise operational impacts on SEC Parties, noting that a series of High Impact Maintenance Windows (HIMWs) would be required to implement the service, during which the entire system will be offline. They considered that these outages would have significant operational impacts for SUs and prepayment customers who would be unable to top up during these periods. Therefore, they advised DCC to carefully consider the timing of these outages to minimise disruption, avoiding periods of high demand, adverse weather events, or heightened customer vulnerability. To support this, they recommended that close engagement between the DCC and the Operations Group (OPSG) would be vital in exploring and agreeing mitigations.

DCC response

18. DCC notes the request for further clarity on the specific dates and dependencies for the DCC Connect cutover. This detail has been provided in the consultation on the approach to the delivery of the change of DCC Gateway Connection network provider under the DSP Programme. This consultation set out the enduring changes to the SEC to support DCC Connect connections. It also set out the approach to migrating existing users onto DCC Connect connections. All of the proposed SEC changes to support DCC Connect are set out in a draft SEC Appendix AU 'Network Evolution Transition and Migration Approach Document' (NETMAD). This consultation closed on 12 December 2025 and can be found using the following link: [DSP consultation on the regulatory changes for DCC Connect | Smart DCC](#).
19. DCC notes the significant operational impact that HIMWs have on customers and is committed to making the necessary updates to the smart meter system without their use where possible. For the planned HIMWs in Q1 2026 for cutover of SPs to DCC Connect, DCC presented its rationale to the Technical Architecture and Business Architecture Sub-Committee (TABASC) and the OPSG in September 2025, outlining how HIMWs were necessary to protect service and avoid unplanned outages. DCC will continue to engage with industry via these groups to ensure any decisions on this topic are made collaboratively, to minimise disruption and consider key factors such as vulnerable consumers and the time of year into any decision making.

2.2. Question 2

20. DCC sought views on the proposed milestones for the SRG and associated dependencies.

Q2

Do you agree with the proposed Milestones for the cutover onto the SRG and associated dependencies on SUs?

Respondent views

21. Three respondents agreed with the proposed milestones for the SRG and with one noting that an early and successful cutover to the SRG will remove the implementation risk from impacting later Milestones. All three respondents considered the cutover window to be short, but felt the benefits outweigh this. One of the respondents highlighted the need for detailed timelines and a clear understanding of Supplier impacts with advance notice and robust support during the transition needed to mitigate any risks.
22. A fourth respondent noted the SRG's critical role in ensuring service continuity and that the TABASC has identified the SRG timeline as a potential delivery risk. This is particularly the case given that the proposed SRG migration period overlaps with the festive season, which may affect resource availability and responsiveness across the industry. To mitigate this risk, the respondent recommended continued and meaningful engagement with the TABASC to ensure that the feasibility of the proposed timelines is fully understood and that any associated risks are proactively managed. They concluded that should the DCC's proposed four-month window prove insufficient for SRG migration, or should any migration window prove unrealistic, the overall delivery timeline may be compromised, and that this should be avoided as it would indicate missed milestones and further delay.

DCC response

23. DCC notes the request for further clarity on the specific dates and dependencies for the DSP Release 1 (formerly SRG) cutover. More detailed planning and engagement on this topic will take place throughout 2026, in particular to deliver the regulatory consultation to support this activity.
24. DCC expects that the cutover activity for SUs in DSP Release 1 will be less technically complex than that of DCC Connect, principally because there will not be a requirement for physical changes, site surveys, and commercial discussions, amongst other things. DCC has set out the proposed high-level process for SU cutover below and is proceeding on the basis that a 4.5-month cutover window will be sufficient based on this process. DCC will continue engaging SUs on the proposed steps for SU cutover for DSP Release 1, including via the TABASC, where DCC will be collecting feedback from SUs on the proposed approach and further prepare SUs for this activity. DCC will also be consulting on the proposed approach and steps for DSP Release 1 in the aforementioned regulatory consultation planned for 2026. The steps include:
- a. **Part 1: Preparatory work in advance of Go-Live.** SUs make preparatory network changes in advance of Release 1 Go-Live on 25 August 2027, including preparing Certificate Signing Requests (CSRs) (for new DCCKI2 certificates) and updating their firewalls in readiness to allow connectivity into the SRG. In preparation for this, DCC will provide a detailed specification of instructions, including details of the new Universal Resource Locators (URLs), to all SUs detailing what changes will be made, and engagement will support SUs with this process.
 - b. **Part 2: Network Connectivity and Technical Readiness Testing (TRT) 1.** Post Go-Live, DCC will then begin the first stage of network connectivity and TRT via a 'self-service' model for SUs i.e. a process whereby SUs can complete this activity in their own time without direct support/ engagement from DCC. This will involve connectivity 'ping' tests

between SUs and DCC. Again, a detailed specification of instructions will be provided to SUs to take them on this network connectivity process.

- c. **Part 3: Connecting to the DSP Release 1 (TRT 2).** Once Part 2 is complete and network connectivity is established, DCC will establish a schedule of work to complete Part 3. This will involve scheduling a cutover slot with individual SUs on a date that works for both parties, where the SU will install their new DCCKI2 Certificates and update their URLs to connect to the DSP Release 1 infrastructure (SRG,, DCCKI2).
25. Part 3 of the steps above would involve scheduling a one-hour call with SUs to complete this step. Based on the assumption of three cutovers per evening, 15 cutovers per week, and a worst-case failure rate of 50%, this activity would last 13.5 weeks. Based on these assumptions, DCC considers that the planned cutover window of 4.5 months for the DSP Release 1 cutover for SUs will be sufficient. DCC will continue engaging with SUs on this topic and provide more detail through engagement including the relevant SEC Sub-Committees and the planned consultation.

2.3. Question 3

26. DCC sought views on the proposed dates for User Integration Testing (UIT) for Future DSP and whether it should be mandatory.

Q3

Do you agree with the proposed Milestones for UIT testing for Future DSP and that there should be a mandatory component to UIT testing?

Respondent views

27. Two respondents agreed with the proposed milestones for UIT with one highlighting that the benefits of mandatory UIT may result in issues being uncovered earlier in the process. They added that if mandatory testing is chosen, then all active participants should be made to engage, not just Suppliers. However, they questioned how mandatory UIT would be enforced and considered it may be unnecessary as most participants would be keen to participate in testing.
28. One respondent supported comprehensive testing but did not support mandatory participation for all Suppliers. They recommended that the DCC ensures that enough (two or more) Suppliers and adapter providers have successfully tested before exit criteria are met. They also raised a lesson learned from the As-Is DSP implementation: that some Distribution Network Operators (DNOs) should be required to test their unique functions, and that this could be in collaboration with Suppliers.

DCC response

29. DCC notes the comments both in support and against mandatory UIT for the DSP programme. DCC will incorporate these comments into the ongoing analysis on this topic and is still determining whether it wishes to propose that UIT should be mandated. The SVTAD consultation sets out the process for consulting on mandatory UIT, should DCC wish to propose it. DCC will not be able to impose this, rather it can set out a recommended approach, but it will be for the Secretary of State to determine whether any DCC proposals for mandatory UIT testing should be implemented.
30. DCC will confirm its proposed approach to UIT and mandatory testing at a later stage of the programme, and will ensure there is appropriate engagement with SUs and TPs to inform its proposals, and notes the regulatory requirement for consultation on it.

2.4. Question 4

31. DCC sought views on the proposed dates for the submission and decision on the LSC.

Q4

Do you agree with the proposed Milestones for LSC, including that there should not be a LSC decision for the cutover to DCC Connect?

Respondent views

32. Three respondents agreed with the proposed milestones for LSC with one respondent requesting more detail on the criteria and assurance that consumer impacts will be minimised. Regarding DCC Connect, one respondent noted that there will be an internal “Acceptance Into Service” review to replace LSC for DCC Connect. This respondent considered this to be reasonable assuming that any issues that surface with the new gateway connection in the first few days can be backed out by quickly reverting to the Gamma link prior to decommissioning. They advised the DCC to state that this is an option in the forthcoming consultation on the NETMAD, along with any other mitigations for poor DCC Connect performance.

DCC response

33. DCC can confirm that, should there be issues during cutover to DCC Connect from Gamma, that there will be the option for SUs to roll back to the existing Gamma connection. In this scenario, DCC and the SU will revert to the back-up date that has been pre-agreed to complete the cutover to DCC Connect. This will also be an option for the SPs during their cutover prior to Go Live and the beginning of SU cutovers.
34. Should there be an issue with the new DCC Connect gateway connection after the cutover is complete, this will be treated as an incident and resolved through the enduring incident management process. This is because there must be a point in the process where the responsibility for resolving issues with gateway connections passes from one supplier to another (in this instance Gamma to Vodafone). DCC chose that point to be once DCC have proven service on the new connection i.e. once cutover is complete. After this point, DCC can hold Vodafone to account to resolve any issues with the new service rather than revert back to Gamma connections, which has the potential to create operational confusion and cause further issues for SUs. This approach is therefore also based on the assumption that, should there be issues with DCC Connect connections, such issues would likely appear during the cutover rather than once the cutover is complete.
35. The teams at DCC managing the cutover process are working closely with DCC’s Service Desk to ensure the approach to cutting over gateway connections and resolving issues on new connections once they are live is aligned. Further details have been provided on this process in the aforementioned consultation on the approach to the delivery of the change of DCC Gateway Connection network provider under the DSP Programme. This consultation closed on 12 December 2025 and can be found using the following link: [DSP consultation on the regulatory changes for DCC Connect | Smart DCC](#).
36. DCC notes the request for further information on the LSC for the DSP programme, including assurance that consumer impact will be minimised. DCC and the Department have now finalised the aspects of the plan that are subject to LSC and have updated the plan accordingly. This includes the addition of two new milestones that support this activity for Private Key Transfer during device migration. Please see the updated plan below.
37. DCC and the Department will be engaging further on the LSC and will share details, including the list of criteria, at a later stage in the programme via appropriate engagement, including the relevant SEC Sub-Committees and consultations for topics that have LSC decision points. The Department will also present the criteria to SEC Panel in due course before submitting these to DCC.

2.5. Question 5

38. DCC sought views on the proposed Milestones for device migration.

Q5

Do you agree with the proposed Milestones for device migration?

Respondent views

- 39. One respondent agreed with the proposed Milestones for device migration and commented that these give a sufficient window for all parties to complete the migration.
- 40. One respondent advised that the device migration soft launch needs to be carefully planned, considering Smart Metering Equipment Technical Specifications 2 (SMETS2) devices and the variety of SMETS1 cohorts, credit and Pre-Payment customers, single-rate and multi-rate customers with different devices.
- 41. One respondent considered the proposed nine-month migration window to be relatively short, but achievable. They recommended an extensive soft launch period, with Pre-Payment customers prioritised for summer migration during warm weather in case of any top-up issues. They queried whether any additional load on the As-Is DSP for migration had been estimated, noting that Suppliers will not be planning for any field activity should there be any fallout in the migrations which require a customer remediation visit.
- 42. One respondent did not agree with the proposed Milestones for device migration due to insufficient detail on the migration approach, the risk of increased non-communication devices, and potential financial implications such as Guaranteed Standards of Performance (GSOP) payments. They requested more information on the migration methodology, expected volumes, timing, and lessons learned from the Enduring Change of Supplier (ECOS) migration.

DCC response

- 43. DCC notes the requests for further information on the process and timelines for device migration. DCC has commenced the initial scoping work both internally and externally to identify the parameters for this activity. DCC is planning on the basis that nine months will be sufficient for device migration and has made this assessment based on previous migrations, the scale of work required for DSP, and feedback from SUs on previous migrations. DCC does not consider that the dependencies on SUs during device migration will be significant and will continue to engage with customers as this assessment develops. DCC is committed to providing further information on device migration, including detailed timelines and processes, at CP5.
- 44. The process to collect further information will begin with sharing and discussing the lessons learnt from DCC's Enduring Change of Supplier (ECoS) programme. These discussions will take place at relevant SEC Sub-Committees in 2026, including but not limited to the TABASC, OPSG, Security Sub-Committee (SSC) and the Small Suppliers Forum, to ensure a broad range of input from customers into this activity. DCC plans to share the lessons for validation and to agree how those lessons should inform the approach for DSP device migration. These include lessons learnt from ECoS regarding the migration of devices for pre-payment customers. DCC will ensure impacts to the customers are minimised and prioritised in terms of planning and implementation, including summertime migration where possible. DCC will continue to engage with appropriate customer groups, such as OPSG, to jointly agree with industry how best to manage the migrations of pre-payment and vulnerable consumers.
- 45. DCC will ensure that the comments made by respondents to this consultation feature in lessons learnt and subsequent feedback process and will provide more detail on the plan for device migration as it develops. DCC has committed that the plan will include a 'soft launch' at the beginning of the device migration window with a slow ramp-up of migrations, followed by a

sustained volume migration, and that the approach to device migration will take into account specific provisions for pre-payment customers including time of year that migrations take place.

2.6. Question 6

46. DCC sought views on whether there are any further Milestones that are missing from its revised plan.

Q6

Do you consider there to be any additional Milestones needed that are missing from this revised plan?

Respondent views

47. Two respondents took the view that no Milestones are missing from the revised delivery plan.
48. One respondent suggested adding milestones for consultations on the Technical Migration Approach Document (TMAD) and the SEC Variation Testing Approach Document (SVTAD), and for testing documentation and transition planning.

DCC response

49. A Milestone exists in the plan for when the regulatory changes required for testing will be confirmed and the conclusions document following the SVTAD consultation is submitted to the Department. This date is 26 February 2026, which follows the consultation which began on 3 November 2025 and will run for six weeks. This can be found here: [DSP Consultation on the SEC Variation Testing Approach Document for Future DSP | Smart DCC](#).
50. DCC has taken the decision to outline the provisions that are required to support device migration, including the end-to-end process for device migration for both SMETS1 and SMETS2 devices, as part of an update to the NETMAD rather than a TMAD.
51. The changes to the NETMAD will be the subject of a consultation for which the dates are still being finalised. DCC is planning on the basis that this consultation will take place in Q2 2026 and will share confirmed dates with customer groups as required once the timelines have been confirmed.
52. All other test artefacts are assured and approved by the SI and DCC and will not be the subject to consultation; therefore, dates for these have not been included in the plan.

2.7. Question 7

53. DCC sought views on its engagement approach.

Q7

Do you have any other comments on this plan and the engagement approach?

Respondent views

54. One respondent welcomed the comprehensive engagement plan outlined in the consultation and highlighted the good level of engagement to date. Noting the programme dependencies, they recognised that successful delivery would rely not only on the DCC, but also on the active participation of other parties across the industry. Further to this, they acknowledged the specific dependencies placed on the SEC Panel and its Sub-Committees, and their commitment to fulfilling these responsibilities in a timely and constructive manner. They added that proactive collaboration will be essential to the successful delivery of the DSP Programme, particularly in managing key risks such as those associated with the SRG migration and HIMWs. Similarly, they advised that unanticipated additions to, or changes in, testing scope should be discussed with the TAG.

55. One respondent emphasised the need for early and detailed consultation, particularly regarding device migration and risk management. They highlighted concerns about migration of pay-as-you-go customers during the winter periods, and requested assurance on certificate transfer and mitigation of the non-communications risk.
56. One respondent also noted that the following risks had been missed from the consultation document:
- **DSP behavioural comparison/assurance:** They considered any DSP behaviour that is not in the interface specifications may differ between As-Is and Future DSP, risking additional change within Service Users' processes/systems. They suggested a mitigation would be to perform comparative analysis of both the DSPs side by side for a series of critical use cases and unhappy path scenarios.
 - **Overall timelines and value for money of SEC modification decisions:** They noted any delay to the migration from the old to new the DSP risks undermining any value for money decisions made regarding not implementing on the As-Is DSP. They suggested that clarity on planning contingency availability and usage into the SEC change working group may serve to mitigate this.
57. The same respondent sought clarity with regard to the new Control Point 4 (Blueprint Complete) mentioned in paragraph 13 of the consultation and its link with MP304¹ should it be approved in or after December 2025. This is considering the DCC had previously advised industry that a December 2025 Change Board vote to approve would be sufficient for it to get into the scope for making it into the Future DSP baseline, without incurring Future DSP change costs.
58. The same respondent also sought clarity on whether the As-Is DSP contract can be extended past December 2028 if needed considering the risk that the migration may take longer than expected.

DCC response

59. DCC notes the requirement to approach the plan for DSP in a pragmatic manner and is committed to minimising the period of dual-running DSPs and therefore reducing cost where possible. DCC is aware of the importance of the DSP programme to industry and the potential operational impacts on its customers during its delivery. We are therefore prioritising the SU-facing elements of the plan, namely the cutovers to DCC Connect and DSP Release 1, and device migration.
60. DCC welcomes the feedback on engagement and will continue to work collaboratively with industry on the key elements of the plan to reduce risk, identify opportunities and deliver a solution that meets the demands of our customers.
61. DCC notes the queries focused on device migration, specifically:
- how Suppliers will know which devices are on which DSP (As-Is DSP vs Future DSP) during the migration;
 - concerns about migration of pay-as-you-go customers during the winter periods; and
 - the request for assurance on certificate transfer and mitigation of the non-communications risk.
62. As discussed in the response to question 5, DCC is still developing the plan and approach to device migration and will ensure that the comments made by respondents to this consultation feature in their development. This will begin with the ECoS lessons learnt exercise and supporting engagement which will set out how DCC will refine the device migration process for DSP based on past migrations. DCC is committed to involving industry and collaborating to develop an approach to device migration that works for them. This will include the process for monitoring and reporting of devices during dual-running of the DSPs, how the device migration for pay-as-you-go

¹ [Scheduling Services for SMETS1 Devices \(SRV 4.3\) - Smart Energy Code](#) – this modification seeks to update the DUIS to enable Eligible Users to setup Scheduled SRV 4.3s to SMETS1 Devices using SRV 5.1 'Create Schedule'.

customers will be managed including time of year and any other provisions, and the approach to managing the risk associated with non-communicable devices during the migration period.

63. Regarding the two risks highlighted by a respondent, DCC's response is as follows:
- a. **DSP behavioural comparison/assurance:** DCC notes that this is a risk and is one that is being monitored but wasn't specifically highlighted in the consultation. DCC is mitigating this risk by aiming for functional equivalence between the As-Is DSP and the Future DSP. This approach has been taken to ensure that the Future DSP meets customers' needs. Specific steps that have and will continue to embed this approach and mitigate this risk include: testing activity on the programme which assures the new solution against existing functionality, including UIT; assurance of the new solution by the SI which is based on the requirements collected from customers and from the Incumbent provider; and ongoing customer engagement on the solution and its architecture at appropriate forums such as TABASC..
 - b. **Overall timelines and value for money of SEC modification decisions:** DCC notes this risk and is taking steps to mitigate it by minimising the potential for delays on the programme. These include the role of the SI and DCC programme team in managing the plan and controlling change, working incrementally through design, build and test to embed an agile and flexible approach to delivery in a complex environment, and engaging with SUs so they understand their dependencies in meeting programme timelines. The DSP programme will also continue to engage with the DCC in-life change team to track SEC modifications and any dependencies with the DSP programme, which are then discussed with industry via TABASC.
64. DCC notes the comment regarding the SEC modification MP304 and has representatives from the DSP programme supporting conversations at Change Board as it progresses through the governance process. DCC would like to confirm that blueprint exit (CP4) does not constitute a change freeze but that additional scope beyond this point will have to be subject to the Change Request and associated impact assessment and governance processes.
65. DCC notes the comments regarding TAP and will ensure that appropriate commercial arrangements are in place to support the transition from the As-Is DSP to the Future DSP.

3. Summary of changes to the plan

66. After reviewing the responses received, DCC has made the following changes to the revised delivery plan for the DSP programme that it consulted on:
- The Milestones for the 'Confirmation of Regulatory Change' and 'Order Confirmation Begins' for DCC Connect have been combined to allow more time for the conclusions for the DCC Connect NETMAD consultation to be finalised. The new Milestone number for this activity is 2, with both the conclusions document being submitted and the changes being designated on the same date.
 - The following definitions and associated labels within the Milestone plan list have been added to the DSP Programme to distinguish between the main 'Releases' that will be delivered:
 - **Release:** A Release for the purposes of this LC13B plan is a packaged set of SEC and SU-impacting production changes or capabilities delivered on the DSP programme. A release will typically involve new code and contain customer/ SU dependencies and result in changes to core capabilities of the DSP system.
 - **Release 1:** The Milestones and descriptions (9, 12, 14, 19, 20, 21, 22, 25, 29, 30, 31, 39) previously labelled and relating to the SRG have been updated to now be termed 'DSP Release 1' in this document and the revised plan. This is because further design work has identified that, as well as releasing the SRG at this point in the programme, this release will also include new DCCKI certificates (DCCKI2).

- **Release 2:** Some of the Milestones and descriptions (4, 8, 13, 16, 17, 18, 23, 24, 26, 27, 32, 33, 34, 35, 36, 37, 38) previously labelled and relating to the Future DSP Go-Live have been updated to 'DSP Release 2' to distinguish them from Release 1 and other future Releases. The remaining Milestones and descriptions that have retained labels of 'Future DSP' are Milestones that do not relate to a specific Release.
 - There may be further Releases post-device migration, including further capabilities such as Modular DUIS, that DCC will confirm at later Control Points in the plan.
- The Milestones for the 'Confirmation of Regulatory Change for SRG' and 'Confirmation of Regulatory Change for DCC12' for Release 1 (previously SRG) have been combined and moved later in the programme to 19 November 2026. This decision has been taken to deliver a single consultation with all the regulatory changes required for Release 1, and to allow more time for the design of Release 1 to be completed to inform the consultation. The new Milestone number for this activity is 9. The Milestone date has changed to ensure that the DSP programme aligns to the principle that the regulatory changes to the SEC have been confirmed before the relevant PIT window for that activity closes, allowing time for those changes to be worked through in appropriate testing activity and to reduce the risk of additional testing being required post consultation. DCC will also seek to publish the regulatory consultation for this activity in advance of the PIT window starting. In this case, the regulatory changes must be confirmed before the end of the PIT window for Release 1 in December 2026.
- Updated Milestone title (13) from 'Confirmation of Regulatory Change' to 'Confirmation of Other Regulatory Change', and the description to include 'this will include changes regarding Install & Commission and other dual-run DSP activities', plus any changes needed for the 'steady state' enduring Future DSP solution. The date has also been brought forward to 31 January 2027. The Milestone date has changed to ensure that the DSP programme aligns to the principle that regulatory changes to the SEC have been confirmed before the relevant PIT window for that activity closes, allowing time for those changes to be worked through in appropriate testing activity and to reduce the risk of additional testing being required post consultation. DCC will also seek to publish the regulatory consultation for this activity in advance of the PIT window starting. In this case, the regulatory changes must be confirmed before the end of the PIT window for Release 2 in April 2027.
- Updated Milestone titles (41, 42, 43) from 'Transfer of Install & Commission (I&C) and Remaining Private Keys' to 'Commencement of I&C (incl. transfer of ACB Private Keys used for I&C)', and the descriptions to include 'and the transfer of ACB Private Keys used for I&C'. This change has been made following discussions with the Department that resulted in further detail on which keys would be transferred at which Milestone being included.
- Updated Milestone title (47) from 'Transfer of Remaining Private Keys' to 'Transfer of Remaining Operational Capability from the As-Is DSP to Future DSP', and description to include 'including Recovery Private Keys, Contingency Private Keys, and Symmetric Keys that are used to encrypt the Contingency Public Key in the Root Certificate'. This change has been made following discussions with the Department that resulted in further detail on which keys would be transferred at which Milestone being included.
- Two new Private Key Transfer Milestones (44 & 46) to reflect that the Milestone 'Transfer of Remaining Operational Capability from the As-Is DSP to Future DSP' (46) will be subject to a separate LSC process and decision. This change has been made following discussions with the Department regarding LSC for the DSP programme.
- There will be a recovery environment as part of the Future DSP although it will be implemented as a cloud solution as opposed to a physical environment. The recovery environment will have the same Go-Live as DSP Release 2 (38) and the description for this Milestone has been updated to reflect this. The recovery environment will be tested in SIT and as part of the migration of the keys in production where DCC will take a sample of devices and check they can be recovered.

- Updated Milestone dates, titles and descriptions for the two Milestones associated with Business Acceptance Testing (BAT) (19, 20). The dates have been brought forward to be conducted for Release 1 rather than Release 2 as DCC considers that core service readiness processes, such as incident management, will be going live at Release 1, making BAT more appropriate at this stage of the programme. The dates have moved from the BAT window opening on 8 November 2027 and closing on 17 December 2027 to opening on 17 May 2027 and closing on 18 June 2027.

67. The plan that DCC is submitting to the Department for approval can be found in Appendix A of this document.

4. Next steps

68. DCC is of the view that it has had appropriate engagement and consultation with industry on the revised delivery plan for the DSP Programme. As the responses to the consultation and engagement in industry were broadly supportive of the proposed plan, DCC will submit this to the Department for approval.
69. 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 proposed plan and, as such, further consultation is neither necessary nor appropriate.
70. Should the Department approve this plan, following a decision to do so, DCC will initiate a request with the IMF to add or amend the relevant Milestones on the JIP.

Appendix A – DSP delivery plan Milestones

This table sets out the proposed Milestones for the DSP Programme that are being submitted to the Department for approval. The Milestones that have been amended and discussed in Section 3 are shown in the pink rows and the Milestone that has been completed is shown in the blue row; all other Milestones are as they were described in the consultation.

- **Release:** A Release for the purposes of this LC13B plan is a packaged set of SEC and SU-impacting production changes or capabilities delivered on the DSP programme. A release will typically involve new code and contain customer/ SU dependencies and result in changes to core capabilities of the DSP system.
- **Release 1:** This refers to the first deployment of production changes and capabilities on the DSP programme when the SRG and new DCCKI certificates (DCCKI2) will Go Live. Release 1 will involve the cutover of SUs and SPs over a 4.5-month period.
- **Release 2:** This refers to the second deployment of production changes and capabilities on the DSP programme when the remaining changes and capabilities will Go Live. Release 2 will signal the start of device migration to the Future DSP.

#	DSP Milestone	Description	Date
1	Future DSP – Control Point 4 (Blueprint Complete)	Date by which DCC will confirm whether a further LC13B consultation is required to update future Milestones. If applicable, a request for an LC13B direction will be made to DESNZ. The blueprint phase completes the high-level design of the Core DSP Solution.	14/11/25
2	DCC Connect – Confirmation of Regulatory Change & Order Confirmation Begins	Latest date by which DCC will issue a conclusions document following consultation on the proposed transitional and enduring changes needed to SEC subsidiary documents for DCC Connect along with conclusions on plans for implementation of those SEC changes. This is also the latest date by which DCC can begin confirming orders for the DCC Connect service from SUs and TPs (DCC can accept orders once the NETMAD has been designated).	26/01/26
3	Future DSP – Confirmation of Testing Approach	Latest date by which DCC will issue a conclusions document following consultation on the proposed DSP SVTAD.	26/02/26
4	Future DSP Release 2 – PIT Window Opens	Latest date by which PIT of Programme Increment 1 commences.	16/03/26
5	DCC Connect – Go-Live and Service User Cutover Window Begins	Latest date by when the cutover of Service Users' existing DCC Gateway Connections to the DCC Connect service can commence, and the earliest date by when new SUs' DCC Connect connections can Go-Live. This is also the latest date by when the cutover of TPs from Gamma to the DCC Connect service can commence and earliest date by when new TPs' DCC Connect connections can Go-Live.	25/03/26
6	Future DSP – Confirmation of Device Selection Methodology	Latest date by which DCC will issue a conclusions document following consultation on the proposed Device Selection Methodology.	10/04/26
7	Future DSP Release 1 – PIT Window Opens	Latest date by which PIT of Release 1 commences.	31/08/26
8	Future DSP Release 2 – Migration Approach Confirmation of Regulatory Change	Latest date by which DCC will issue a conclusions document following consultation on the proposed technical migration approach for Future DSP Release 2.	30/09/26

#	DSP Milestone	Description	Date
9	Future DSP Release 1 – Confirmation of Regulatory Change (SRG + DCCKI2)	Latest date by which DCC will issue a conclusions document following consultation on the proposed transitional and enduring changes needed to SEC subsidiary documents for Future DSP Release 1 (Test and Production environments) including the proposed DCCKI2 changes, along with conclusions on plans for implementation of those SEC changes.	19/11/26
10	Future DSP – Control Point 5 (PI-4 Build Complete)	Latest date by which DCC will confirm whether a further LC13B consultation is required to update future Milestones for Future DSP. If applicable, a request will be made to DESNZ. This Milestone aligns with the end of build for Programme Increment 4, at which point the functional development of the Future DSP will have been completed.	04/12/26
11	Future DSP Release 1 – PIT Window Closes	Latest date by which a PIT completion decision for R1 is made by the designated governance body as advised by DESNZ.	16/12/26
12	Future DSP Release 1 – SIT Window Opens	Latest date by which SIT starts for the Future DSP Release 1.	18/01/27
13	Future DSP Release 2 – Confirmation of Other Regulatory Change	Latest date by which DCC will issue a conclusions document following consultation on any outstanding transitional and enduring changes needed to SEC subsidiary documents for subsequent Future DSP Release 2 along with conclusions on plans for implementation of those SEC changes. This will include changes regarding Install & Commission and other dual-run DSP activities.	31/01/27
14	Future DSP Release 1 – SIT Window Closes	Latest date by which a SIT completion decision for the Future DSP Release 1 is made by the designated governance body as advised by DESNZ.	26/03/27
15	DCC Connect – Service User Cutover Window Closes	Latest date by which DCC requires all SUs to have completed the cutover of existing DCC Gateway Connections to the DCC Connect service. This is also the latest date by which DCC requires TPs to have completed cutover from Gamma to the DCC Connect service.	30/03/27
16	Future DSP Release 2 – PIT Window Closes	Latest date by which a PIT completion decision for Programme Increments 1-4 is made by the designated governance body as advised by DESNZ.	02/04/27
17	Future DSP Release 2 – SIT Window Opens	Latest date by which SIT starts for Programme Increments 1 - 4 for Core DSP functionality.	05/04/27
18	Future DSP Release 2 – Device Migration SIT Window Opens	Latest date by which SIT starts for Device Migration functionality.	05/05/27
19	Future DSP Release 1 – BAT Testing Window Opens	Latest date by which BAT will commence for the Future DSP Release 1.	17/05/27
20	Future DSP Release 1 – BAT Testing Window Closes	Latest date by which BAT will close following acceptance by the DCC Service Acceptance Team.	18/06/27
21	Future DSP Release 1 – UIT Testing Window Opens	Latest date by which TPs can commence testing in the UIT environment for the Future DSP Release 1.	21/06/27
22	Future DSP Release 1 – UIT Testing Window Closes	Latest date by which TP testing completes in the UIT environment for the Future DSP Release 1.	16/07/27
23	Future DSP Release 2 – Final System	Latest date by which the final System Capacity Test window will open for Programme Increments 1 – 4.	22/07/27

#	DSP Milestone	Description	Date
	Capacity Test Window Open		
24	Future DSP Release 2 – SIT Window Closes	Latest date by which a SIT completion decision for Programme Increments 1 – 4 Core DSP functionality is made by the designated governance body as advised by DESNZ.	22/07/27
25	Future DSP Release 1 – LSC Go-Live Submission	Latest date by which DCC will submit its LSC submission in relation to the Future DSP Release 1 Go-Live to DESNZ and SEC Panel. This LSC document will cover the Go-Live for the SRG in Production, the Go-Live of the new DCCKI Certification Authority (DCCKI2) in Production, and DCC being ready to deploy the Future DSP Release 1 infrastructure.	30/07/27
26	Future DSP Release 2 – Device Migration SIT Window Closes	Latest date by which a SIT completion decision for Programme Increments 1 – 4 Device Migration functionality is made by the designated governance body as advised by DESNZ.	06/08/27
27	Future DSP Release 2 – UIT-B Testing Window Opens	Latest date by which TP testing starts in the UIT-B environment for the Future DSP Release 2.	13/08/27
28	Future DSP –Control Point 6 (Modular DUIS)	DCC to confirm whether a further LC13B consultation is required to update future milestones for Modular DUIS, and whether any regulatory changes would be required for this. If applicable, a request will be made to DESNZ.	30/08/27
29	Future DSP Release 1 – LSC Go-Live Decision	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel recommendation. A positive response will take the form of designation of the enduring updates to the SEC, which enables the changes to Live systems for the Future DSP Release 1. This LSC decision will cover the Go-Live in production for the SRG, the new DCCKI Certification Authority (DCCKI2), and DCC being ready to deploy the Future DSP Release 1 infrastructure.	14/09/27
30	Future DSP Release 1 – Go-Live	Latest date by which production capabilities are live and DCC is ready to deploy the Future DSP Release 1 infrastructure	15/09/27
31	Future DSP Release 1 – Service User Cutover Window Opens	Latest date by which the cutover of SUs to the Future DSP Release 1 infrastructure can commence.	20/09/27
32	Future DSP Release 2 – Final System Capacity Test Window Closes	Latest date by which the final System Capacity Test completion decision will be made for all Programme Increments by the designated governance body as advised by DESNZ.	21/10/27
33	Future DSP Release 2 – UIT-B Testing Window Closes	Latest date by which the TP testing window in the UIT-B environment will close.	05/11/27
34	Future DSP Release 2 – LSC Go-Live Submission	Latest date by which DCC will issue its LSC submission in relation to Future DSP Release 2 Go-Live to DESNZ and SEC Panel.	10/01/28
35	Future DSP Release 2 – UIT-A Test Window Opens	Latest date by which TP testing starts for Future DSP Release 2 in the UIT-A environment.	15/02/28
36	Future DSP Release 2 – LSC Go-Live Decision	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel recommendation. A positive response will take the form of	21/02/28

#	DSP Milestone	Description	Date
		designation of the enduring updates to the SEC, which enables the changes to Live systems for Future DSP Release 2.	
37	Future DSP Release 2- UIT-A Test Window Closes	Latest date by which the TP testing window for the Future DSP Release 2 in the UIT-A environment will close.	21/02/28
38	Future DSP Release 2 - Go-Live	Latest date by which capabilities are live and ready to start migration and operation of devices on the Future DSP. This will include the Go-Live of the recovery environment.	22/02/28
39	Future DSP Release 1 - Service User Cutover Window Closes	Latest date by which DCC requires all SUs to have completed the cutover to the Future DSP Release 1 infrastructure.	29/02/28
40	Future DSP - Device Migration Commences	Latest date by which migration capability will be available for DCC to begin migration of devices from As-Is to the Future DSP.	03/03/28
41	Future DSP - LSC Go-Live Submission for Commencement of I&C Transfer (incl. transfer of ACB Private Keys used for I&C)	Latest date by which DCC will issue its LSC submission in relation to Install & Commission Go-Live on the Future DSP and the transfer of ACB Private Keys used for I&C o DESNZ and SEC Panel.	11/09/28
42	Future DSP - LSC Go-Live Decision for Commencement of I&C Transfer (incl. transfer of ACB Private Keys used for I&C)	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel Recommendation. A positive response will take the form of designation of the enduring updates to the SEC, which enables the transfer of I&C to the Future DSP and the transfer of ACB Private Keys used for I&C.	29/10/28
43	Future DSP - Commencement of I&C Transfer (incl. transfer of ACB Private Keys used for I&C)	Latest date by which I&C service request processing and the associated manufacturing pack private keys have been transferred from As-Is to Future DSP and the transfer of ACB Private Keys used for I&C.	30/10/28
44	Future DSP - LSC Go-Live Submission for Transfer of Remaining Operational Capability from the As-Is DSP to Future DSP	Latest date by which DCC will issue its LSC submission in relation the transfer of remaining operational capability and private keys, including Recovery Private Keys, Contingency Private Keys, and Symmetric Keys that are used to encrypt the Contingency Public Key in the Root Certificate, from the As-Is DSP to Future DSP.	31/10/28
45	Future DSP - Device Migration Complete	Latest date by which all devices will have been migrated to the Future DSP.	15/12/28
46	Future DSP - LSC Go-Live Decision for Transfer of Remaining Operational Capability from the As-Is DSP to Future DSP	Latest date by which DCC will receive a response from DESNZ on the LSC following SEC Panel Recommendation. A positive response will take the form of designation of the enduring updates to the SEC, which enables the transfer of the remaining operational capability and private keys, including Recovery Private Keys, Contingency Private Keys, and Symmetric Keys that are used to encrypt the Contingency Public Key in the Root Certificate, from the As-Is DSP to Future DSP.	16/12/28
47	Future DSP - Transfer of Remaining Operational Capability	Latest date by which all remaining operational capability and private keys, including Recovery Private Keys, Contingency Private Keys, and Symmetric	17/12/28

#	DSP Milestone	Description	Date
	from the As-Is DSP to Future DSP	Keys that are used to encrypt the Contingency Public Key in the Root Certificate, have been transferred from As-Is to Future DSP.	

Appendix B – DSP delivery plan Plan-on-a-page

This plan-on-a-page sets out the proposed Milestones for the DSP Programme that are being submitted to the Department for approval.

DSP LC13B Delivery Plan

