

Virtual WAN Solution

DCC conclusions on the SEC Variation Testing Approach Document

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Author: consultations@smartdcc.co.uk

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Table of Contents

1. Introduction and context.....	3
1.1. Purpose of this document.....	3
1.2. The VWAN Programme	3
1.3. Direction to produce the SVTAD.....	3
1.4. Consultation responses and next steps	4
2. Analysis of responses	4
2.1. Question 1.....	4
2.2. Question 2.....	5
3. Summary of drafting changes	6
4. Next steps	6
5. Attachments	6

1. Introduction and context

1.1. Purpose of this document

1. The purpose of this document is to conclude on the Data Communications Company's (DCC's) recent consultation on the proposed drafting of the Virtual Wide Area Network (VWAN) Smart Energy Code (SEC) Variation Testing Approach Document (SVTAD).
2. Based on stakeholder feedback, DCC is not proposing any fundamental amendments to the VWAN SVTAD drafting that was consulted upon. A small number of amendments to align nomenclature used in this document to other published documentation.

1.2. The VWAN Programme

3. There is an increasing demand from consumers wanting a smart meter. However, some areas fall outside of cellular/radio coverage resulting in a lack of a Wide Area Network (WAN). Premises that fall outside the scope of the cellular/radio coverage are known as No WAN premises. At present those living in No WAN premises are not able to benefit from the functionality of a smart meter. This can lead to consumers being both frustrated and disappointed by the current options available to them.
4. DCC has been working with its Service Providers and with the Department for Energy Security & Net Zero (DESNZ) to develop a VWAN Solution, to address the challenge of No WAN. Manufacturers are developing a VWAN Device (VWD) to enable, with their consent, a connection to a consumer's internet service.
5. DCC commenced the launch of the next generation 4G Communications Hub (CH) in December 2024. This will form the basis for the development of the VWAN Solution.
6. The development of a VWAN Solution will help to address the challenge of No WAN premises, enabling all those who want a smart meter and who have and are prepared to use their internet connection to have one. Energy Suppliers have voiced their support for the development and delivery of a solution as quickly as possible.

1.3. Direction to produce the SVTAD

7. On 26 November 2024, in accordance with SEC Section X11.4, the Secretary of State directed DCC to develop a draft SEC Variation Testing Approach Document (SVTAD) for the variations to the SEC being considered to enable the introduction of the VWAN Solution (the 'VWAN SVTAD').
8. The general requirements for the contents and development of an SVTAD are set out in SEC Section X11. These include testing objectives, the testing to be undertaken, and the environments to be used.
9. The Direction received from the Secretary of State requires that the VWAN SVTAD should provide for the detailed test approach that will enable DCC to introduce an Internet-based Smart Metering Solution using the consumer's broadband and for this to be set out in associated documents to be developed by DCC.
10. The Direction also sets out that the SVTAD should:
 - Set out the process for deciding which types of VWAN Devices will be selected for use (during testing);
 - Provide for the detailed test approach to be set out in an associated Testing Approach Document (TAD); and

- Provide for DCC to revise these documents in accordance with any request made by the Secretary of State and provide for where these documents need to be submitted to the Testing Advisory Group (TAG) for approval (with any disagreement being submitted to the Secretary of State for final determination).
11. In accordance with SEC Section X11.6, any SVTAD developed by DCC needs to be submitted to the Secretary of State following consultation with SEC Parties and the TAG. DCC has been directed to complete this by 31 January 2025.

1.4. Consultation responses and next steps

12. This consultation, issued in December 2024, sought views on:
- The proposed drafting for the VWAN SVTAD. The views received and DCC's responses are covered in section 2.1 of this document.
 - The proposed designation date for incorporating the VWAN SVTAD into the SEC. The views received and DCC's responses are covered in section 2.2 of this document.
13. Based on stakeholder feedback, DCC is not proposing any fundamental amendments to the VWAN SVTAD drafting that was consulted upon. A small number of amendments to align nomenclature used in this document to other published documentation.
14. DCC will submit its conclusions to the Secretary of State on 31 January 2025. Subject DESNZ approval, the VWAN SVTAD is due to be incorporated into the SEC on 31 January 2025 (or within one month thereafter).

2. Analysis of responses

15. DCC received five written responses to this consultation: two from Large Suppliers, one from a Network Party, one from a Device Manufacturer and one from a Government Department.
16. DCC has analysed the feedback provided. This section sets out an overview of the responses received to this consultation and DCC's response.

2.1. Question 1

17. DCC sought views on the proposed drafting of the VWAN SVTAD.

Q1

Do you agree with the proposed SVTAD for the VWAN Programme? Please indicate any areas of disagreement and your rationale for this

Respondent views

18. All respondents agreed with the proposed VWAN SVTAD, with three respondents raising specific questions as part of the response and one respondent proposing minor grammatical updates which have been applied to the final version attached to this report.
19. One respondent raised a comment on the use of a single Device Model Combination:
- The respondent noted that the SVTAD is proposing to limit VWD testing to one Device Model Combination and rely significantly on emulators. Noting that in other programmes, this has contributed to defects emerging in UIT when DCC Users undertake device testing.

20. One respondent raised the following specific questions relating to the scenario where the VWAN Device (e.g. a PPMID) is remote from the CH and Alt HAN is required for communications with the CH:
- What is the mechanism employed to allow the Supplier to install the Alt HAN bridges?
 - Would a Handheld Terminal (HHT) or similar device be used for commissioning the bridges where the VWD can't communicate with the CH in the first place?
21. One respondent suggested that consideration should be given to enabling a roaming capability in the 4G CHs to ensure smart meters are able to remain connected to the DCC using the strongest available signal from any of the cellular networks

DCC response

Device Model Combinations

22. DCC has noted these comments in relation to use of emulators in place of real VWDs during the PIT and SIT phases of testing.
23. DCC can confirm that for SIT exit a real VWD will be used to prove VW Arrangements, as DCC does not test devices.

Alt HAN

24. DCC has noted these comments relating to the interoperability of the VW Solution and Alt HAN.
25. For clarification the VWD is not necessarily a PPMID.
26. DCC confirms based on our understanding this would be feasible to use ALT HAN where necessary. This is being investigated by our Design Team.

Roaming

27. DCC has noted these comments. However, the roaming capability is outside the scope of the VWAN Arrangements.

2.2. Question 2

28. DCC sought views on the proposed designation date for incorporating the SVTAD into the SEC.

Q2

Do you agree with the proposed designation date for the VWAN SVTAD of 31 January 2025 or as soon as reasonably practicable within one month thereafter? Please provide your rationale

Respondent views

29. All five respondents agreed with the proposed designation date for the VWAN SVTAD.

DCC response

30. As noted in the consultation, we intend for the VWAN SVTAD to be designated and incorporated into the SEC on 31 January 2025 (or within one month thereafter).

3. Summary of drafting changes

31. After reviewing the responses received, DCC is not proposing any fundamental changes to the version of the VWAN SVTAD that was consulted upon.
32. There have been a small number of amendments to align nomenclature used in this document to other published documentation. These are included in Attachment 1 to this document.

4. Next steps

33. DCC is of the view that it has had appropriate engagement and consultation with industry on the proposed drafting for the VWAN SVTAD. As the responses to the consultation and engagement in industry were supportive of the proposed drafting, DCC will submit this to the Department for incorporation into the SEC.
34. 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 VWAN SVTAD drafting and, as such, further consultation is neither necessary nor appropriate.
35. In summary, DCC considers that the VWAN SVTAD is fit for purpose.

5. Attachments

- Attachment 1: Proposed VWAN SVTAD