



Communications Hubs & Networks

Consultation on Phase 2 regulatory
changes (transitional and enduring)

Date: 24/04/2024

Respond by: 17:00 on 22/05/2024

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Table of Contents

1. Introduction and context.....	3
1.1. Background and approach to regulatory change	3
1.2. Purpose of the consultation.....	4
2. Temporary rules for forecasts and ordering of 4G CHs	6
2.1. Enduring Forecasting and Ordering Rules	6
2.2. Proposed temporary forecasting rules	6
2.3. Proposed temporary ordering rules	7
2.4. Managing changes to the 4G CH delivery milestones	7
3. Arrangements for Mesh CH replacement.....	9
3.1. Transitional Mesh CH replacement pilot during IPV.....	10
3.2. Enduring Mesh CH replacement	11
4. Initial Pallet Manufacture	12
5. Controlling the application of the 4G changes to the SEC Main Body (Sections).....	13
6. Re-designation date of the CHHSM	13
7. Re-designation of the NETMAD and the CHIMSM.....	14
8. Next steps	14
9. How to respond	15
10. Attachments	15
Appendix A – 4G CH Forecasting & Ordering Timeline.....	16
Appendix B – CHHSM Draft Direction Text.....	17
Appendix C – NETMAD Draft Direction Text.....	18
Appendix D – CHIMSM Draft Direction Text	19

1. Introduction and context

1. The Data Communications Company (DCC) is Britain's key enabler to a future smart 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 (Smart Metering Equipment Technical Specifications (SMETS2) smart meters, as well as the migration of existing first-generation (SMETS1) meters onto its network.
2. The Communications Hubs and Networks (CH&N) Programme is a DCC initiative to define and deliver future-proofed Communications Hubs and 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 the development and implementation of options for a 4G solution.
3. The delivery plan for the CH&N Programme¹ includes several Joint Industry Plan (JIP) milestones. One of these is 'Conclusions on enduring and transitional legal text regulatory changes for the programme – Phase 2' with a milestone date of 31 May 2024. This document forms our consultation on those changes.

1.1. Background and approach to regulatory change

4. On 31 March 2023, DCC concluded on its initial assessment of regulatory changes that will be required for the 4G solution. In those conclusions, DCC outlined the anticipated changes required to several Smart Energy Code (SEC) Subsidiary Documents (SSDs), DCC owned documents and Main Body SEC changes².
5. In September 2023, DCC further consulted on proposed enduring and transitional regulatory changes and published its conclusion on 3 November 2023³. In parallel to this consultation, the Department for Energy Security and Net Zero (The Department) published a consultation on proposed changes to the DCC Licence and the Main Body SEC for the 4G CH&N programme.⁴
6. On 5 April 2024, DCC concluded on proposed SEC changes to support the 4G CH Forecasting, Ordering and Delivery Service being introduced by the CH&N programme⁵. In its initial consultation, DCC set out further items that it was still considering which are required to support the roll out of 4G CHs. These items included:
 - temporary rules for 4G CH ordering and forecasting;
 - rules for 2/3G Mesh CH replacement; and
 - the Communications Hub Supporting Information (CHSI).
7. DCC has been engaging with its customers (Energy Suppliers and Meter Asset Providers (MAPs)) on the items above through a series of workshops and engagement with SEC Sub-Committees⁶. The first series of workshops took place in February 2023 to June 2023 and the second series took place in November 2023 to January 2024. It has also undertaken further analysis of the potential

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 [CH&N Conclusions on its consultation on Transitional and Enduring Regulatory Changes | Smart DCC](#)

⁴ [Department for Energy Security and Net Zero: Smart Metering Implementation Programme Consultation on changes to the DCC Licence and the Smart Energy Code for the 4G Communications Hubs & Networks Programme » \(smartenergycodecompany.co.uk\)](#)

⁵ [CH&N Conclusions on SEC Changes for 4G Communications Hub Forecasting, Ordering & Delivery Service](#)

⁶ [Conclusions on 4G Transition Strategy following collaborative workshops](#)

regulatory changes required to support transitional arrangements for the forecasting and ordering of 4G CHs, as well as the coordination of 2/3G Mesh CH replacement. This engagement has resulted in the proposals set out in this document. However, we note that updates to the CHSI will be consulted on separately. We are aiming to issue a consultation on the CHSI in mid-May 2025.

8. Go-Live of the 4G communications service is planned for 2 December 2024 with the start of the Initial Pallet Validation (IPV) activity where a limited number of 4G Communications Hubs will be installed in consumer premises. To enable this, Communications Hubs needed for IPV will be ordered in June 2024 (for which arrangements already exist in the Network Evolution Transition and Migration Approach Document (NETMAD)) and those ordered hubs will be manufactured from early August 2024. Transitional provisions are required to enable this 'Initial Pallet Manufacture' (IPM) activity, proposals for which are set out in this document.
9. Separately, the planned changes to the DCC Licence and the Sections ("Main Body") of the SEC which were consulted upon by the Department in September 2023 are expected to be incorporated into the SEC in July 2024. However, a number of these changes will need to be suspended ('switched off') until the 4G communications service goes live, planned for 2 December 2024, and others until the 4G Communications Hubs mass forecasting and ordering arrangements go live, planned for 1 October 2024. The NETMAD, as a transitional document, is used for temporarily switching off these provisions, and the associated proposed drafting is set out in this document.

1.2. Purpose of the consultation

10. Following our engagement in the most recent workshop on 24 January 2024, DCC is proposing legal drafting to be incorporated into the following documents through designation by the Department:
 - SEC Appendix AU 'Network Evolution Transition and Migration Approach Document'
 - SEC Appendix I 'CH Installation and Maintenance Support Materials' (CHIMSM)
11. The purpose of this consultation is to obtain views on the proposed changes, which include provisions to facilitate the following:
 - Temporary forecasting and ordering rules for 4G CHs;
 - The replacement of 2/3G Mesh CHs via a pilot during the IPV Stage;
 - Enduring rules for 2/3G Mesh CH replacement supported by regular reporting provided by DCC;
 - Provisions permitting the issuing of Device Certificates and Organisation Certificates to enable DCC to undertake the activities required for IPM of 4G Communications Hubs;
 - Transitional amendments to switch off, from the point of their introduction until the start of IPV, some of the Main Body SEC obligations that the Department consulted upon in September 2023 and that are expected to be introduced into the SEC in July 2024;
12. The consultation also seeks views on the following:
 - The re-designation date of SEC Appendix H 'Communications Hub Handover Support Materials' (CHHSM) to support the 4G CH Forecasting, Ordering and Delivery Service;
 - The re-designation date of the NETMAD to support the temporary forecasting and ordering rules for 4G CHs, the 2/3G Mesh CH replacement pilot, clauses to support IPM and other clauses to support the application of the 4G changes to the SEC Main Body; and

- The re-designation date of the CHIMSM to support Enduring rules for 2/3G Mesh CH replacement.
13. This consultation is expected to impact Large & Small Suppliers and Other SEC Parties, specifically Meter Asset Providers (MAPs).
 14. This consultation will close on 22 May 2024 at 17:00.

2. Temporary rules for forecasts and ordering of 4G CHs

15. DCC has received feedback from Parties seeking more flexibility in forecasting and ordering rules for initial 4G CH deliveries. This flexibility is requested to help manage orders and forecasts for 4G CHs alongside those for 2/3G CHs and to aid in stock level management during the transition to 4G. To address this, DCC proposes temporary rules to reduce SEC-mandated timeframes for forecasting and ordering, detailed in a new section within the NETMAD (section 6).
16. The proposed changes will impact Parties intending to order 4G CHs for delivery in the first five delivery months (July to November 2025) following the 'Start of Enduring 4G CH Supply' JIP Milestone (30 June 2025).
17. These proposed rules were supported by attendees at the 24 January 2024 industry workshop.
18. Appendix A of this document illustrates the timelines set out below for when 4G CH forecasts and orders should be submitted.

2.1. Enduring Forecasting and Ordering Rules

19. DCC notes that the existing arrangements for forecasting and ordering of 2/3G CHs, as set out in SEC Section F5 'SMETS2+ Communications Hubs Forecasts & Orders', will also apply to 4G CHs on an enduring basis. These rules are as follows:
 - Parties shall submit a forecast 12 months in advance of the delivery month (i.e. a forecast in April 2025 would provide the detail of Communication Hubs required for April 2026).
 - Each forecast shall make reference to the number of CHs to be delivered each month for each Region (noting that 4G Central/South shall be one Region).
 - Where a party does not provide a forecast for a Region, the party's forecast shall be the same number of CHs for a delivery month forecasted in the previous month (including zero if a forecast was not provided).
 - Parties shall submit orders five months prior to the delivery month for each Region (noting that 4G Central/South shall be one Region).
 - In order to be a compliant order, the submitted number of CHs to be ordered must be within $\pm 20\%$ variance of the number of CHs forecasted 12 months prior to the delivery month.
 - Each forecast and order shall be submitted by no later than the 5th Working Day prior to the last Working Day of each month in which it is due.

2.2. Proposed temporary forecasting rules

20. Whilst the enduring arrangements are unchanged from the existing forecasting and ordering provisions, Parties intending to order 4G CHs for delivery in July, August, September, October or November 2025 will be required to submit their forecasts less than the standard 12 months prior to the delivery date. These reduced timescales will be as follows:
 - July and August 2025 deliveries: A single forecast covering both delivery months shall be submitted in October 2024 (nine month forecast for July 2025 and a ten-month forecast for August 2025 deliveries).
 - September 2025 deliveries: A forecast shall be submitted in November 2024 (ten month forecast for September 2025 deliveries).

- October and November 2025 deliveries: A single forecast covering both delivery months shall be submitted in December 2024 (ten month forecast for October 2025 deliveries and an eleven-month forecast for November 2025 deliveries).

21. No changes are proposed to the day in the month by which forecasts must be submitted.

2.3. Proposed temporary ordering rules

22. In addition to the forecasting rules noted above, DCC is also proposing temporary ordering rules to apply in respect of the delivery months of July, August and September 2025. Parties that wish to order 4G CHs for delivery in one of these months shall submit a single order covering all three months no later than 11 April 2025 (four Working Days after the 'LSC: Volume M/f decision' JIP Milestone). As such, these temporary rules provide additional flexibility in contrast with the usual rules which required an order to be placed five months in advance.
23. As a result of the temporary forecasting rules, the forecast month in which the tolerances for order quantities set out in SEC Section F 5.10 will be applied to will also change. Currently tolerances for each order are applied against the forecast submitted by the Party in the 12th month prior to the start of the Delivery Month. However, tolerances for orders of 4G Communications Hubs in the months of April, May and June 2025 will apply as follows:

Delivery Month	Corresponding Order Month	Forecast month tolerance applied to
July 2025	April 2025	October 2024 (9 months prior to the delivery month)
August 2025	April 2025	October 2024 (10 months prior to the delivery month)
September 2025	April 2025	November 2024 (10 months prior to the delivery month)
October 2025	May 2025	December 2024 (10 months prior to the delivery month)
November 2025	June 2025	December 2024 (11 months prior to the delivery month)

24. No changes are proposed to the day in the month by which the order must be submitted, nor the tolerance rules for the degree to which the order might vary from the last submitted forecast.

2.4. Managing changes to the 4G CH delivery milestones

25. DCC notes that due to unforeseen circumstances, scenarios might arise whereby the dates above may need to change. To accommodate any changes that may be needed to these dates, we are proposing five new JIP Milestones, one for each of these delivery months in which temporary rules need to apply. The requirement for when the associated forecasts need to be submitted would be tied to the delivery months on the JIP (e.g. a forecast is required on or before the 5th Working Day prior to the last Working Day of the month that is x months in advance of the JIP delivery month), such that if the delivery month on the JIP is amended, the date by which the forecast needs to be submitted will also move.
26. Regarding any changes to ordering dates, as mentioned in section 2.2 above, we are only proposing temporary ordering rules to apply to the delivery months of July 2025 (First 4G CH Delivery Month

JIP Milestone), August 2025 (Second 4G CH Delivery Month JIP Milestone) and September 2025 (Third 4G CH Delivery Month JIP Milestone), not October 2025 (Fourth 4G CH Delivery Month JIP Milestone) or November 2025 (Fifth 4G CH Delivery Month JIP Milestone). Parties that wish to order 4G CHs for delivery in July, August or September 2025 shall submit a single order covering all three months no later than 11 April 2025 (four Working Days after the 'LSC: Volume M/f decision' JIP Milestone). Therefore, the order date for deliveries in the months of the First, Second and Third 4G CH Delivery JIP Milestones would be tied to the date four Working Days after the 'LSC: Volume M/f decision' JIP Milestone. For example, if the 'LSC: Volume M/f decision' JIP Milestone shifted a month from its current date of 7 April 2025 to 7 May 2025, then the order for July, August and September 2025 delivery months would need to be submitted by 13 May 2025 (four Working Days after 7 May 2025).

27. The consequence of this approach is that any proposal by the DCC to change these milestones would go through the JIP governance process. DCC notes that any changes to JIP Milestones are usually only communicated to members of the Implementation Managers Forum (IMF). However, any changes to the proposed 4G CH Delivery Month JIP Milestones would impact all Parties intending to order 4G CHs, not just members of the IMF. Therefore, in addition to following the JIP Change Request process when seeking to change any of the five new 4G CH Delivery Month JIP Milestones, DCC shall consult with all SEC Parties. DCC shall ensure that any additional views received from SEC Parties on the proposed change in dates are, subject to any confidentiality considerations, provided to the IMF meeting that is considering the Change Request.
28. Also, we note that a scenario could arise whereby the forecast or order dates linked to a 4G CH Delivery Month JIP Milestone have already passed at the time that delivery JIP Milestone is moved. Should this scenario occur, the forecast or order does not need to be repeated and DCC proposes that it shall continue to process the original forecast or order in line with the new delivery month date, treating the forecast or order as if it had been submitted in respect of the revised delivery month. For example, if the delivery month for July 2025 shifts one month to the right to be August 2025, any forecasts and/or orders received in respect of the July 2025 date will be deemed to be forecasts and/or orders in respect of the August 2025 date.
29. For the avoidance of doubt, the new 4G CH Delivery Month JIP Milestones that we are proposing are as follows:

Delivery Month	Proposed JIP Milestone
July 2025	First 4G CH Delivery Month
August 2025	Second 4G CH Delivery Month
September 2025	Third 4G CH Delivery Month
October 2025	Fourth 4G CH Delivery Month
November 2025	Fifth 4G CH Delivery Month

30. The draft changes for this can be found in Attachment 1 of this document and have been drafted against version 1.0 of the NETMAD. The variations in this NETMAD have been made against the version of SEC Section F that is expected to be introduced by the Department towards the end of July 2024. Therefore, we note that Clause 6 of the NETMAD will have no effect in the period between when this NETMAD is proposed to be designated on 21 June 2024 and until the Main Body changes are introduced. We consider this to be acceptable as the obligations for transitional 4G CH forecasting and ordering do not apply until 1 October 2024.

31. DCC will continue to regularly engage with ordering parties both bi-laterally and via industry forums such as the SEC Operations Group (OPSG), the SEC Communications Transition Group (CTG) and the DCC Supply Chain Working Group (SCWG) to ensure that these transitional rules are clear and understood well in advance of when the first transitional rules come into place.

Q1

Do you have any comments on the proposed temporary rules for forecasts and ordering of 4G Communications Hubs? Please provide your rationale.

Q2

Do you have any comments on the proposed approach to utilise the JIP Change Request Process should any of the new delivery month JIP Milestones need changing, ensuring all SEC Parties are consulted? Please provide your rationale.

Q3

Do you agree with the DCC proposal that should any of the Delivery Month dates be amended, any previously submitted forecasts and orders in respect of that Delivery Month should be treated as if submitted in respect of the amended Delivery Month? Please provide your rationale.

Q4

Do you have any detailed comments on the legal drafting in SEC Appendix AU (NETMAD), including the proposed temporary process for submitting forecasts and orders of 4G Communications Hubs set out in section 6 of the NETMAD? Please provide your rationale.

3. Arrangements for Mesh CH replacement

32. The 2/3G Mesh CH solution in the Central and South Regions provides a mechanism to extend the Wide Area Network (WAN) range to premises that are outside of cellular coverage.
- Some CHs that are within cellular coverage can act as a “Gateway” to communicate with premises out of cellular coverage
 - Some CHs outside of cellular coverage can act as a “Hop” to further extend coverage.
33. As some CHs depend on other CHs for their connectivity, the replacement of a Gateway or Hop Mesh CH with a 4G CH could lead to premises losing connectivity. Figure 1 below shows an example of the link between “Gateway” and “Hop” Mesh CHs:

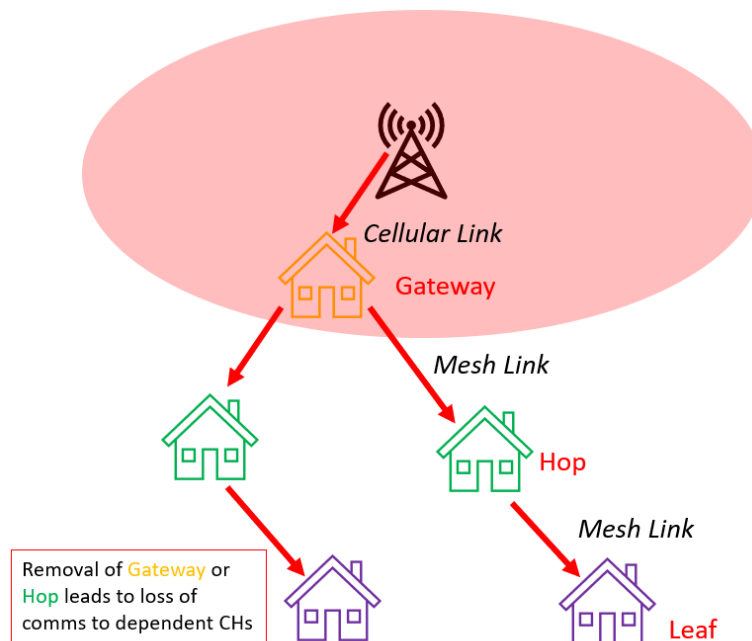


Figure 1: Mesh CH network example

34. The replacement of Mesh CHs is an important aspect of the transition to 4G CHs which needs to be carefully managed due to the impact their removal could have on an energy consumer's remote smart connectivity. DCC has considered the options for Mesh CHs and presented proposals via industry workshops as part of specific stakeholder engagement on this subject. Two separate aspects are considered:

- The process by which the replacement of Mesh CHs could be trialled during IPV; and
- The subsequent enduring rules to apply to the replacement of Mesh CHs.

3.1. Transitional Mesh CH replacement pilot during IPV

35. DCC hosted the latest workshop on 24 January 2024 and set out proposals for the coordination of 2/3G Mesh CH replacements during the IPV Stage (Monday 2 December 2024 to Friday 7 February 2025). DCC proposes that during this period it will facilitate a pilot whereby Mesh CHs will only be replaced in small, controlled numbers to gain confidence. DCC will identify only Devices that will not create a risk of consumers losing remote connectivity for inclusion in the pilot. We expect this pilot to involve a relatively small number of Mesh CHs and Suppliers are not required to take part in it. The number of Suppliers that choose to take part will dictate the scale of the pilot and therefore we cannot set a minimum number of successful Mesh CH replacements to successfully exit the pilot.

36. Therefore, DCC proposes adding a new section to the NETMAD (section 7) to set out rules for the pilot of Mesh CH replacement during the IPV Stage. The following approach was discussed as part of the engagement workshops, where DCC Customers were supportive of following this approach.

37. In early November 2024, before the commencement of the IPV Stage, DCC will make available a DCC telephone number and email address to all Suppliers to use to request details of a Supplier's Mesh CHs that are available to be swapped out during the pilot. Only Mesh CHs that have not been active as a Gateway or a Hop in the six-month period prior to the start of the IPV Stage will be candidates for the pilot. To facilitate this we have added two new definitions to the NETMAD defining both an Active Mesh CH Gateway and Hop. Any Responsible Supplier wishing to take part in the pilot must then inform DCC prior to the IPV Stage using the contact details provided by DCC. As soon as reasonably practicable following this notification, DCC will then provide those Suppliers

who request these details with a list of their Device IDs for the Mesh CHs that are available to be swapped out.

38. DCC will monitor the progress of the pilot and a summary of the results will be included in the IPV Completion Report. We will also provide monthly updates to the CTG.
39. The draft changes can be found in Attachment 1 of this document and have been drafted against version 1.0 of the NETMAD.

Q5

Do you have any comments on the proposed rules for the replacement of 2/3G Mesh Communications Hubs during IPV?

Q6

Do you have any detailed comments on the legal drafting in Clause 7 of SEC Appendix AU (NETMAD)? Please provide your rationale.

3.2. Enduring Mesh CH replacement

40. DCC's analysis suggests that only a minority of currently deployed Mesh CHs are operating as either a Mesh "Gateway" or "Hop" (i.e. in a way that means that they have other CHs dependent on them for smart connectivity). Through this analysis DCC believes it is reasonable to assume that a Mesh CH that has not been active as a Gateway or a Hop for six months can be assumed to not have other CHs dependent on it for smart connectivity. If such Mesh CHs are replaced, this will create further opportunities for other Devices to be replaced (for example, a Mesh CH that was previously providing a link to another CH would now have no dependent CHs and it could be replaced). Therefore, over time the number of Mesh CHs will naturally shrink.
41. DCC cannot identify the speed at which the number of Mesh CHs will shrink through this passive approach. However, we believe it to be appropriate and proportionate at this time to provide information to Suppliers to facilitate the natural shrinking of the Mesh CHs in a way that considers the impact on consumers' remote smart connectivity. Consequently, we do not propose any additional measures (such as targeted replacement) at this time. This is consistent with stakeholder feedback. However, we will carefully monitor the rate at which the number of Mesh CHs is shrinking. This will enable us to assess if further intervention should be considered to support a transition from the Mesh CH solution.
42. As a result, DCC is proposing a staged passive approach to Mesh CH replacement whereby the number of Mesh CHs is allowed to shrink organically. To facilitate this, we are proposing a rule to apply from the end of IPV which would prohibit the replacement of Mesh CH Gateways and Hops (including Special Installation Mesh CHs) that have been active in the past six months with a 4G Communications Hub until 31 December 2031. The rationale for this date is that it would allow two years prior to the sunset of the 2G network for the replacement of Mesh Communications Hubs not yet replaced. We will add the same two new NETMAD definitions referred to in paragraph 37 above to the CHIMSM defining both an Active Mesh CH Gateway and Hop. In addition, we are proposing requiring the DCC to provide information on what CHs cannot be replaced with a 4G Communications Hub (i.e. identification of active Mesh CH Gateways and Hops). DCC will identify a Mesh CH that is not permitted to be replaced with a 4G Communications Hub as one that has been active as a Mesh Gateway or Hop in the last six months. It is proposed that this reporting would begin from 1 January 2025, and the details of these reports, such as the frequency, format and accessibility, will be discussed via further stakeholder engagement and the reporting requirements will subsequently be consulted upon for proposed inclusion in the SEC before this date.

43. DCC also intends to provide enduring reporting to the CTG to track and report on progress of Mesh CH replacement. The detail of this reporting will be agreed via further stakeholder engagement with the CTG.
44. The draft changes for this can be found in Attachment 2 of this document and have been drafted against version 5.1 of the CHIMSM. This is the version DCC concluded upon on 3 November 2023⁷ and is scheduled to be designated by the Department before the changes referenced in this consultation are targeted to be designated.

Q7

Do you have any comments on the proposed enduring rules for the replacement of 2/3G Mesh Communications Hubs, including the proposal to protect active Mesh CH Gateways and Hops until 31 December 2031?

Q8

Do you have any comments on the proposed date of 1 January 2025 and whether this is an appropriate time from which DCC will provide reporting on Active Mesh Gateways and Hops?

Q9

Do you have any comments on the proposal that the detailed format and mechanism for this reporting will be developed so that it can be included in the SEC prior to the reporting date commencing?

Q10

Do you have any detailed comments on the legal drafting in SEC Appendix I (CHIMSM), including the proposed new definitions and Clauses 8.14 and 8.15? Please provide your rationale.

4. Initial Pallet Manufacture

45. To support the start of IPV in December 2024, CHs needed for IPV will be ordered in June 2024 (for which arrangements already exist in the NETMAD) and those ordered hubs will be manufactured from early August 2024. Ahead of enduring changes being made to the SEC later in 2024 for the 4G service, specific changes are required to enable this IPM activity. In particular, this includes the ability for DCC to issue Device Certificates and Organisation Certificates in respect of components of the 4G solution, to support the manufacture of 4G Communications Hubs. A transitional provision will therefore be required until the enduring changes to the SEC are made.
46. The proposed transitional provision in Clause 8.1 of the NETMAD states that DCC will be relying on the use of additional DCC Service Providers in order to send and receive messages to and from 4G Communications Hubs. In order to permit the issuing of Device Certificates and Organisation Certificates that will support the provision of services using these additional DCC Service Providers and 4G Communications Hubs, the Systems of these DCC Service Providers shall be treated as falling within limb (a) of the Definition of DCC Live Systems. This provision enables the necessary certificates to be generated.
47. The draft changes for this can be found in Attachment 1 of this document.

Q11

Do you have any comments on the proposed changes to support IPM?

⁷ CH&N Conclusions on its consultation on Transitional and Enduring Regulatory Changes

5. Controlling the application of the 4G changes to the SEC Main Body (Sections)

48. The Department expects the changes to the SEC Sections (“Main Body”) and the DCC Licence that it consulted upon in September 2023⁸ to be introduced in July 2024. These changes include in particular:
- Rights for Parties to place forecasts and orders in respect of unconstrained quantities of 4G Communications Hubs;
 - Requirements for the DCC to provide unconstrained quantities of ordered Communications Hubs that rely on 4G mobile communications technology;
 - Requirements for the DCC to provide Enrolment Services and Communications Services using 4G mobile communications technology;
 - Requirements for the DCC to provide Device and User System Tests (DUST) in respect of the 4G Service; and
 - Requirements for the DCC to provide Test 4G Communication Hubs.
49. In practice the requirement for 4G Enrolment and Communication Services should not be effective (“live”) until the start of IPV and will need to be suspended (“switched off”) until then. The mass forecasting and ordering of 4G Communications Hubs, and the provision of them by the DCC, will need to be switched off prior to October 2024, and then switched on. The forecasting and ordering timelines will be subject to temporary variations for the first few months as set out in Section 2 of this document.
50. For this reason, the Department has noted that the proposed new Clause 9.1 will need to be introduced in the NETMAD to support the Main Body SEC and DCC Licence changes taking legal effect in July 2024, by switching off the above obligations/rights as required. The switching on of these rights/obligations will be achieved via updates to the NETMAD as required to support delivery of the 4G arrangements.
51. The draft changes for this can be found in Attachment 1 of this document.

Q12

Do you have any comments on the proposed transitional amendments to enabling the switching on/off of the SEC main body 4G provisions?

6. Re-designation date of the CHHSM

52. On 17 January 2024, DCC consulted on proposed changes to the CHHSM⁹. This was to support the 4G CH Forecasting, Ordering and Delivery Service being introduced by the CH&N programme.
53. Separate to this, on 20 December 2023, the Department published its conclusions on proposed changes to the DCC Licence and the Main Body SEC for the 4G CH&N programme. As set out

⁸ [Department for Energy Security and Net Zero: Smart Metering Implementation Programme Consultation on changes to the DCC Licence and the Smart Energy Code for the 4G Communications Hubs & Networks Programme](#)

⁹ [CH&N Consultation on SEC Changes for the 4G CH Forecasting, Ordering & Delivery Service | Smart DCC](#)

above, it is expected to introduce those changes into the DCC Licence and the main-body SEC in July 2024.

54. DCC notes that the changes in the CHHSM concluded upon on 5 April 2024 will apply in respect to the handover of any 4G CH, including those ordered for the purposes of IPV as set out in the NETMAD.
55. DCC has discussed the re-designation of the CHHSM with the Department and it is proposed that the CHHSM should be re-designated in line with, or as soon as reasonably practicable following, the Department's designation of the Main Body SEC and DCC Licence changes referenced in paragraph 48 above. DCC is therefore proposing a re-designation date of 1 August 2024 or as soon as reasonably practicable within one month thereafter. DCC is seeking views on this proposed date for re-designation of the CHHSM for the 4G CH Forecasting, Ordering and Delivery service.
56. The draft direction for the re-designation of the CHHSM can be found in Appendix B of this consultation document.

Q13

Do you have any comments on the proposed re-designation date of 1 August 2024 or as soon as reasonably practicable within one month thereafter of the CHHSM?

7. Re-designation of the NETMAD and the CHIMSM

57. DCC currently considers that the NETMAD will require re-designation in time to support IPM go-live. This is due to the rules around certificates described in section 4 of this document needing to be in place in time for IPM. The IPM go-live is currently planned for 24 June 2024. As such, DCC proposes that the NETMAD should be re-designated no later than 21 June 2024 (or within one month thereafter as a contingency measure if required).
58. The CHIMSM changes including the new 4G CH Variant need to be in place by the 'Initial Pallet Validation Start' JIP Milestone (currently 2 December 2024). As such, DCC proposes that the CHIMSM should be re-designated no later than 1 November 2024 (or within one month thereafter as a contingency measure if required).
59. The draft direction for the re-designation of the NETMAD and the CHIMSM can be found in Appendices C and D of this consultation document.

Q14

Do you agree with the proposed approach to re-designate the NETMAD by 21 June 2024 and the CHIMSM by 1 November 2024? Please provide your rationale.

8. Next steps

60. Following the closure of this consultation, DCC will assess respondents' views, and amend the draft changes to the NETMAD and the CHIMSM. DCC will then submit an amended version of each document to the Department that it considers suitable for re-designation into the SEC by the Secretary of State. DCC will also assess respondents' views on the date for re-designation of the CHHSM and provide a summary of the responses to the Department.
61. DCC is aiming to provide a report to the Department by no later than 31 May 2024. This report will contain DCC's consideration of the responses to this consultation as well as the proposed updated versions of the NETMAD and the CHIMSM, as well as the proposed date for re-designation of them and the CHHSM. DCC will publish its conclusions document on its website.

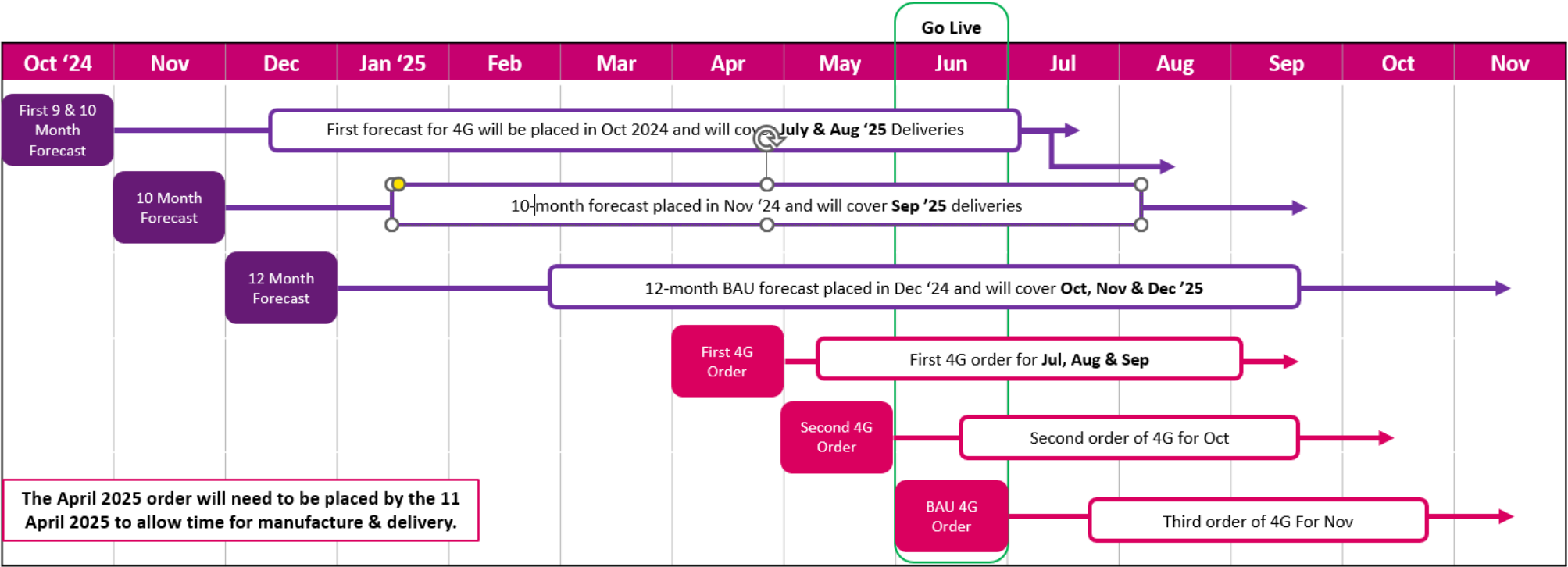
9. How to respond

62. Please provide responses by 17:00 on 22 May 2024 to DCC at consultations@smartdcc.co.uk.
63. Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If the Department or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
64. If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

10. Attachments

- Attachment 1: SEC Appendix AU - NETMAD (Tracked Changes)
- Attachment 2: SEC Appendix I – CHIMSM (Tracked Changes)
- Attachment 3: Consultation Response Template

Appendix A – 4G CH Forecasting & Ordering Timeline



65. We note that the dates above may be subject to the change. As mentioned in section 2 of this consultation, each of the five Delivery Months will be set as JIP Milestones and referenced in the NETMAD. Therefore, any changes to the dates above would undergo the JIP Change Request process, along with a full industry consultation.

Appendix B – CHHSM Draft Direction Text

66. This attachment contains the text that the Department plans to use for direction of changes to the CHHSM.

CHHSM Draft Direction Text

67. This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).
68. Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.
69. Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 1 August 2024, the Communications Hub Handover Support Materials (CHHSM) previously designated and incorporated into the SEC as Appendix H is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.
70. For the avoidance of doubt such re-designation of the CHHSM shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).
71. This direction is also being notified to the SEC Administrator.

Appendix C – NETMAD Draft Direction Text

72. This attachment contains the text that the Department plans to use for direction of changes to the NETMAD.

NETMAD Draft Direction Text

73. This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).
74. Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.
75. Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 21 June 2024, the Network Evolution Transition and Migration Approach Document (NETMAD) previously designated and incorporated into the SEC as Appendix AU, are hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.
76. For the avoidance of doubt such re-designation of the NETMAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).
77. This direction is also being notified to the SEC Administrator.

Appendix D – CHIMSM Draft Direction Text

78. This attachment contains the text that the Department plans to use for direction of changes to the CHIMSM.

CHIMSM Draft Direction Text

79. This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).
80. Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.
81. Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 1 November 2024, the CH Installation and Maintenance Support Materials (CHIMSM) previously designated and incorporated into the SEC as Appendix I, are hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.
82. For the avoidance of doubt such re-designation of the CHIMSM shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).
83. This direction is also being notified to the SEC Administrator.