



Communications Hubs & Networks Consultation on Changes to the SEC Variation Testing Approach Document

A consultation on proposed changes to the SEC Variation
Testing Approach Document for CH&N to support the testing
approach for CH&N

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1. Introduction and Context

1. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out of second-generation (SMETS2) smart meters, as well as the migration of existing first-generation (SMETS1) meters onto our network.
2. The Communications Hubs and Networks Programme (CH&N) is a DCC initiative geared towards defining and delivering future-proof Communications Hubs & Networks with an efficient supply chain and a targeted longevity of at least 15 years. To ensure this longevity of smart functionality DCC is developing a solution to allow for the introduction of new Communications Hubs (CHs) which use the 4G network. To achieve this, DCC established the CH&N Programme to assess development and implementation options for a 4G solution.

1.1. Background

3. On 30 April 2021, Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the Smart Energy Code (SEC), the Secretary of State directed the DCC to develop a draft SEC Variation Testing Approach Document (SVTAD) in respect of those variations to the SEC that are being considered to enable the introduction of the CH&N Arrangements – the 'CH&N SVTAD'.
4. On 11 June 2021, DCC consulted on proposed content for the CH&N SVTAD which closed on 9 July 2021.¹ DCC concluded on the consultation and submitted the proposed draft to the Secretary of State on 23 July 2021.² On 30 July 2021, the first version of the CH&N SVTAD was designated into the SEC as Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements.
5. Section 3 of the CH&N SVTAD sets out the circumstances under which the CH&N SVTAD can be modified. Section 3.1(B) provides that any such modification must include consultation with Parties and other relevant persons, the Testing Advisory Group (TAG), the Authority and the Secretary of State. DCC is consulting pursuant to that section.
6. Since the consultation and conclusion on the CH&N SVTAD, DCC has been further developing its programme delivery plan for the 4G service. As part of this process, the proposed plan for delivery has changed, meaning changes are required to the test approach for CH&N. On 22 August 2023 the Department sent out a communication to the members of the Implementation Managers Forum (IMF) in which it was explained that DCC would be introducing a multi release approach to releases. The change is due to the early release of DUIS changes to support 4G comms hubs and an early release of functionality limited to supporting the manufacture and shipping of comms hubs for IPV. This consultation sets out proposals to align the test approach with the DCC delivery plan.
7. DCC's multi-release approach means that the first System Integration Testing (SIT) will not include testing of all of the sub systems that are in scope for testing under the 4G programme. DCC considers it prudent to update the CH&N SVTAD to reflect the multiple release approach which will require multiple SIT phases. DCC will engage with the Department for Energy, Security and Net Zero's (the Department) smart metering design group and IMF on the potential changes to the Joint Industry Plan (JIP) to reflect the revised multi-release plan.

¹ [Consultation on the Testing Approach \(SVTAD\) for DCC's Comms Hubs and Networks Programme | Smart DCC](#)

² [Conclusions on the Testing Approach \(SVTAD\) for DCC's Comms Hubs and Networks Programme | Smart DCC](#)

2. Proposed changes to CH&N SVTAD

8. The initial version of the CH&N SVTAD was based on an assumption that there would be two releases of content, one for Single Band Comms Hubs (SBCH) and a second release for Dual Band Comms Hubs (DBCH). However, 4G Comms Hubs will not have single and dual band variations and the provision for these two different releases is no longer required. DCC is accordingly proposing changes to the CH&N SVTAD to remove the now redundant references to CH&N Release 1 and Release 2.
9. The initial version of the CH&N SVTAD was also based on an assumption that a single Logistics Sub-System would cover both the OMS and Logistics elements of the CH&N solution. However, this will now be delivered via two separate Sub-Systems, one for the Logistics element and the other for OMS. Each of these sub-systems will be subject to PIT testing and therefore changes have been proposed to the CH&N SVTAD to reflect this.
10. A minor change to the CH&N SVTAD is being proposed to replace references to the DCC LC13B plan for CH&N with references to the JIP milestones for CH&N, as the latter will represent the most up to date view of the programme plan.
11. The original assumption for the CH&N was that all Sub-Systems or Sub-System changes that are required testing for the Dual Band Communications Hub would go live into Production in a single release in December 2024. However, through the development of the programme plan, it has been established that multiple releases will be required. DCC's revised release plan is as follows:
 - a. The first release will comprise the changes to CH&N required for the DUIS which will form part of the planned DUIS release in June 24, and so be combined with the June 2024 SEC Release, even though the supporting functionality to return 4G WAN coverage data in response to a Service Request query will not be capable of being used until the December 2024 CH&N release. These CH&N DUIS changes are being deployed to production earlier than required in order to minimise the impact to Users caused by multiple release of DUIS.
 - b. DCC has also established that the 4G Device Manager (DM) will have to be introduced earlier than initially planned, to enable the manufacturing of 4G Comms Hubs for Initial Pallet Validation (IPV) activities with the required security certificates. This approach requires a second CH&N Release into production prior to December 2024. DCC currently anticipates that this will occur in September 2024.
 - c. The third DCC CH&N release will comprise all of the remaining functionality to support the go-live of 4G CH&N solution in December 2024.
12. DCC is therefore proposing changes to the CH&N SVTAD to accommodate the concept of multiple releases as part of the programme delivery approach for the Dual Band 4G service. The proposed changes:
 - a. introduce the concept of multiple CH&N releases,
 - b. require Test Approach Documents and Test Coverage Documents in respect of each release to be agreed with the TAG, though noting that these documents can be combined across releases if required, and
 - c. require PIT completion and SIT Completion decisions by the Panel for each Release, but enabling PIT completion reports to be combined across multiple releases in respect of the same Sub-System if required.

13. These changes are introduced in a number of places in the SVTAD, most notably clauses 2.4, 2.5, 2.11, 2.12, 4.1, 4.2, 5.1-5.3, 7.1 and 7.4.
14. In the case of the 4G DUIS changes that comprise part of the June 24 SEC Release, as has been the case for previous releases that combine both SEC Modifications and amendments to the SEC being made by the Department, it is proposed that there will be a single test approach document for the release, with a single SIT completion decision, notwithstanding the dual governance approach of the SEC changes. DCC is proposing text for the CH&N SVTAD to provide for the dual governance mechanism in respect of the 4G DUIS changes in the June 24 SEC Release. This is set out in a new Clause 6 which retains CH&N SVTAD governance of any disagreements between DCC and the TAG/Panel relating to the 4G elements of the release, whilst providing for a single test approach document and a single SIT completion decision in respect of the release.
15. The original concept in the CH&N SVTAD was that a Device Selection Methodology will be developed to set out the selection mechanism for devices to be used for testing for a single CH&N Release across PIT and SIT phases of testing for that release. This methodology was part of the DCC CH&N Test Approach Document. However, as there will be multiple CH&N Releases and associated Test Approach Documents, the Device Selection Methodology now needs to be an independent document capable of being applied to each CH&N Release. DCC is proposing changes to the CH&N SVTAD to accommodate this. It is proposed that the DSM will apply in respect of all CH&N releases except for the June 24 CH&N DUIS changes, as the joint test approach document being produced in respect of the June 24 SEC release will specify the approach to use of devices in testing of the DUIS 4G changes.
16. DCC has additionally proposed changes to reflect the fact that its programmes no longer take a waterfall approach to programme delivery but follow an agile delivery methodology. This means that not all testing for a sub-system may be planned at the point at which a test phase (PIT or SIT) for a sub-system begins. Changes have therefore been proposed to Clauses 2.7-2.9 of the CH&N SVTAD to reflect this. In essence the changes require that the testing has been set out in an approved Test Approach Document and Test Coverage Document before the testing starts, but not necessarily at the start of the test phase (the latter being what the current CH&N SVTAD drafting requires).
17. Finally, DCC has proposed a new Clause 8 which provides for a role for the Department in resolving any interoperability testing issues coming out of UIT testing that arise any time prior to the second Live Services Criteria Decision milestone (LSC2), which is a precursor to the start of volume manufacture of 4G Communications Hubs. This replicates the Department role, which is set out in the current agreed CH&N test approach document, in resolving any interoperability testing issues arising during PIT or SIT testing of the 4G Programme.

**CH&N
SVTAD
Q1**

Do you agree with DCC's proposals to amend the CH&N SVTAD? Do you have any detailed comments on the proposed legal drafting? Please provide a rationale for your views.

3. Next Steps

18. Following the closure of this consultation, DCC will take into account respondents' views and prepare a conclusions report for the Department for Energy Security and Net Zero (The Department).
19. DCC is aiming to provide a report to The Department by no later than 1 December 2023. This report will contain details of the responses received and an explanation as to who DCC has taken them into account pursuant to with clause 3.1(b).

20. DCC is proposing to amend the CH&N SVTAD on 15 December 2023 pursuant to the provisions set out in Clause 3.1(b) of the CH&N SVTAD, which provides that DCC may not modify the CH&N SVTAD to the extent that the Secretary of State directs otherwise, utilising the draft notification text presented in Attachment 1.

CH&N
SVTAD
Q2

Do you agree with the proposed amendment of the CH&N SVTAD by the DCC on 15 December 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?

4. How to Respond

Please provide responses by 17:00 on 3 November 2023 to DCC at consultations@smartdcc.co.uk.

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 for Energy Security and Net Zero (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.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

5. Attachments

- Attachment 1: Draft Direction Text
- Attachment 2: Response template
- Attachment 3: Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements

Attachment 1

This attachment contains the text that DCC plans to use for notification of modification of the CH&N SVTAD

CH&N SVTAD Draft Direction Text

Words and expressions used in this notification shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Clause 3.1(b) of SEC Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements (CH&N SVTAD), DCC notifies that, with effect from [DD MMM YYYY] the CH&N SVTAD previously designated and incorporated into the SEC as Appendix AQ is hereby modified in the form set out in Annex [AA] of this notification.

For the avoidance of doubt such modification of the CH&N SVTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being approved, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified document).

This notification is also being sent to the SEC Administrator.