

Future Connectivity North

**DCC conclusions on the
regulatory changes**

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1. Introduction and context

1. The purpose of this document is to conclude on the Data Communications Company's (DCC's) recent consultation on the proposed regulatory changes to the Smart Energy Code (SEC) Subsidiary Documents to enable the provision by the DCC of a 4G communications service in the north Geographical Region.¹
2. DCC needs to identify and set out any regulatory changes required to extend the provision of the 4G service into the north Geographical Region. This document forms our conclusions on the regulatory changes required.
3. This consultation was issued alongside a parallel consultation by the Department for Energy Security & Net Zero (DESNZ) (the Department) on the changes required to the main body of the SEC and to SEC Appendix AU 'Network Evolution Transition & Migration Approach Document' (NETMAD) for provision of 4G in the north.²

1.1. The Future Connectivity North Project

4. The operation of smart meters is reliant on communication with DCC through the Wide Area Network (WAN). Great Britain is split into three Geographical Regions for WAN provision via the Communications Service Providers (CSPs): south, central and north. The north Geographical Region currently uses a Long-Range Radio (LRR) solution, built and managed by Arqiva.
5. DCC has been exploring options for managing connectivity and communications capacity in the north in the longer term and has added 4G WAN provision to the communications services that it will offer in the north Geographical Region. DCC plans to make this 4G service available in the north from 30 May 2025, and the Future Connectivity North (FCN) Project was raised to progress this.

1.2. Consultation responses and next steps

6. This consultation, which ran from 31 March 2025 to 9 May 2025, sought views on:
 - The proposed changes to SEC Appendix H 'CH Handover Support Materials', SEC Appendix I 'CH Installation and Maintenance Support Materials' and SEC Appendix O 'SMKI Repository Interface Design Specification' to deliver the FCN solution; and
 - The proposed designation date for incorporating these changes into the SEC.
7. A summary of the comments received and DCC's responses to these are set out in Section 2 of this document. DCC has made changes to the proposed drafting that it consulted on in response to the comments received, and these are summarised in Section 3 of this document.
8. DCC will submit its conclusions to the Secretary of State on 23 May 2025. Subject to the Department's approval, the changes to the SEC Subsidiary Documents are due to be incorporated into the SEC on 30 May 2025 (or within one month thereafter). These changes will be delivered following Direction from the Department using powers under Condition 22 of the Smart Meter Communication Licence and SEC Section X5 'Incorporation of Certain Documents into this Code'.

¹ [FCN consultation on the regulatory changes | Smart DCC](#)

² [Department for Energy Security and Net Zero \(DESNZ\): Smart Metering Implementation Programme Consultation on changes to the Smart Energy Code to support the extension of the DCC's 4G services to the North - Smart Energy Code](#)

2. Analysis of responses

9. DCC received 11 responses to this consultation: five from Large Suppliers, one from a Network Party, four from Other SEC Parties and one from the SEC Panel.
10. 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

11. DCC sought views on the proposed changes to the SEC Subsidiary Documents other than the NETMAD to deliver the FCN solution.

Q1

Do you agree with DCC's proposed amendments to SEC Appendices H, I and O to deliver the FCN solution?

Respondent views

12. All respondents were broadly supportive of the proposed changes to the SEC Subsidiary Documents. Three respondents provided some suggestions on the proposed drafting:
 - One respondent noted that SEC Appendices H and I contain definitions of a 2G/3G Cellular Communications Hub (CH) and would now include the abbreviation 'LRR' throughout it, which was not previously defined. They queried whether these documents should also include a definition of 'LRR', to enable readers to understand what this refers to and how it differs from other variants.
 - One respondent noted SEC Appendix H clause 3.3 seemed inconsistent in the use of the term '4G North/Central/South' and '4G Central/South'.
 - One respondent considered the wording in SEC Appendix I clause 4.2A appeared very specific to available technologies now. They queried whether this should be rewritten, and potentially merged with clause 4.2, to futureproof this for future technologies while still maintaining the intent of the drafting, and provided some alternative wording for consideration.
 - One respondent queried if it would be easier to rename the Region as '4G region' rather than '4G North/Central/South'.
13. One respondent noted the proposed changes in SEC Appendix O to align to the new Region names. They requested DCC provide examples of the new regional files in .gz format as soon as possible, to understand any potential impacts well in advance of the changes being deployed.
14. One respondent noted their expectation that the operational deployment of 4G in the north will not require any changes to deployed meter functionality, the Smart Metering Equipment Technical Specifications (SMETS), Intimate Communications Hub Interface Specifications (ICHIS) noise performance, or any other aspect of meter hardware or firmware design.
15. One respondent noted their understanding was that for the enduring solution (i.e. the DCC User Interface Specification (DUIS) Service Request Variant (SRV) and Self-Service Interface (SSI) request routes), DCC Users will need to be on the latest version of the DUIS (version 5.3) to be able to send or receive the relevant SRVs to support 4G services in the north (for example the receipt of WAN coverage data for 4G or LRR in one response from DCC for a DUIS SRV or SSI request). The respondent encouraged DCC to communicate this to DCC Users as soon as possible to provide clarity, noting that not all DCC Users may have been close to the wider 4G transition.

DCC response

16. We have reviewed the comments made on the legal drafting and have the following responses:
- We note that all instances of 'LRR' in SEC Appendices H and I are used only as part of the term 'LRR North', which will be defined in SEC Section A 'Definitions and Interpretations' including what 'LRR' is short for. As such, we do not believe this term needs to be further defined in the SEC Appendices.
 - We have corrected the two instances of '4G Central/South' in SEC Appendix H clause 3.3 that had been missed from the original drafting so that they now read '4G North/Central/South'.
 - We note the respondent's proposed wording for SEC Appendix I clauses 4.2 and 4.2A and their rationale for this. However, we believe these clauses should continue to refer to the specific technology types available in each Geographical Region to ensure that it is only the valid technology types for that Geographical Region that can be installed. The addition of any future technologies to a Geographical Region would require corresponding changes to the Annexes within SEC Appendix I, and so these clauses would be updated as part of those changes.
 - We note the suggestion of using the term '4G region' instead of '4G North/Central/South'. The proposed term '4G North/Central/South' is being defined in SEC Section A, and therefore SEC Appendices H and I must align to this term. DCC and the Department have concluded to leave this term unchanged to provide consistency with the other Region names, which are all formed of the applicable technology type and Geographical Region(s).
17. We note the request to provide examples of the new regional files. DCC will be able to provide a sample of the updated certificate schema, including the new Region names, upon request. DCC also confirms that the regional credentials are for the 'WANProvider' certificates only and those certificates are only issued to DCC and only have subjects that are CSPs. All other credentials managed by DCC are identical regardless of Region.
18. DCC can confirm that the operational deployment of 4G in the north will not require any Region-specific changes to the deployed meter functionality, the SMETS, ICHIS compliant noise performance, or any other aspect of meter hardware or firmware design.
19. We acknowledge the comment regarding communicating the need to be on DUIS version 5.3 to be able to submit or receive the relevant DUIS SRVs to query which WAN variants are available at a particular location. We note this does not apply to Users if they are interrogating the Smart Metering (SM) WAN Coverage Database via the SSI, which is independent of the DUIS version. DCC is highlighting this requirement to Users and relevant Sub-Committees in the run-up to Go-Live.

2.2. Question 2

20. DCC sought views on an area of the proposed drafting relating to the number of Delivery Locations that can be specified in an Order of 4G CHs.

Q2

Do you agree with the proposal to retain the current provision in SEC Appendix H clause 3.13(b) limiting a Party to specifying no more than two Delivery Locations per Order of 4G CHs?

Respondent views

21. All respondents either supported the proposal or provided no position on this.
22. One respondent noted that they understood the rationale for retaining the restriction but considered that if it proved to be logistically challenging for Suppliers over the longer term then it

would need to be revisited. Another respondent encouraged DCC to work with any DCC Users to support and address any concerns that may be raised in respect of this limitation.

DCC response

23. We note the support for retaining the current provisions and are not proposing any changes to the regulatory drafting in response to these comments.
24. We note the comments regarding reviewing this limitation. DCC will keep this under review and will work with Suppliers to resolve any issues they may encounter with this in the future. We note that any future change to this limitation would need to be progressed via a SEC Modification.

2.3. Question 3

25. DCC sought views on the proposed designation date for the changes to the Subsidiary Documents.

Q3

Do you agree with the proposed redesignation date for the changes to the SEC Subsidiary Documents of 30 May 2025 (or as soon as reasonably practicable within one month thereafter)?

Respondent views

26. All respondents supported the proposed date of 30 May 2025 (or within one month thereafter). Several respondents expressed support for delivering these changes as soon as possible to enable the use of 4G services in the north.

DCC response

27. As noted in our consultation, we intend for the SEC Subsidiary Document changes to be designated on 30 May 2025 (or within one month thereafter).

3. Summary of drafting changes

28. After reviewing the responses received, DCC has made the following changes to the legal text that was consulted upon:
 - SEC Appendix H: Two instances of '4G Central/South' in clause 3.3 sub-paragraphs (b) and (c) have been corrected to '4G North/Central/South'.
29. The versions proposed for incorporation into the SEC can be found in Attachments 1-3 to this document.

4. Next steps

30. DCC is of the view that it has had appropriate engagement and consultation with industry on the proposed changes to the SEC Subsidiary Documents for the FCN Project. As the responses to the consultation and engagement in industry were supportive of the proposed drafting, DCC will submit these to the Department for incorporation into the SEC.

31. 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 changes and, as such, further consultation is neither necessary nor appropriate.
32. In summary, DCC considers that the changes to the SEC Subsidiary Documents for the FCN Project are fit for purpose.

5. Attachments

- Attachment 1: Proposed changes to SEC Appendix H for FSM
- Attachment 2: Proposed changes to SEC Appendix I for FSM
- Attachment 3: Proposed changes to SEC Appendix O for FSM